

June 27, 2013

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

**Re: NERC Full Notice of Penalty regarding Milford Wind Corridor Phase I, LLC,
FERC Docket No. NP13-_-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Notice of Penalty¹ regarding Milford Wind Corridor Phase I, LLC (MILW)², NERC Registry ID# NCR10394,³ in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations and orders, as well as NERC's Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).⁴

MILW is a Delaware limited liability company, with principal offices located in Boston, Massachusetts, which began commercial operation on November 16, 2009. MILW's assets are located in Beaver and Millard counties in southwestern Utah. MILW generates power from 97 wind turbines with a total generation capacity of 306 MW. This generation is connected to the bulk power system (BPS) by an

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

² The Settlement Agreement refers to Milford Wind Corridor Phase I, LLC as both "MILW" and "Milford." For consistency, MILW will be used exclusively within the Notice of Penalty document.

³ Western Electricity Coordinating Council (WECC) confirmed that MILW was included on the NERC Compliance Registry as a Generator Owner on October 23, 2009 and as a Transmission Owner (TO) and Transmission Operator (TOP) on February 18, 2010. As a TOP, MILW is subject to the requirements of NERC Reliability Standards EOP-005-1, PER-002-0, PER-003-0, TOP-001-1, and TOP-004-2. As a TOP, MILW is subject to the requirements of NERC Reliability Standards FAC-001-0 and FAC-003-1. See *Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC*, 139 FERC ¶ 61,241, Order Accepting Compliance Filing, (June 13, 2012).

⁴ See 18 C.F.R § 39.7(c)(2).

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88-mile long, 345 kV transmission line. This transmission line is radial in nature and does not serve any load; the purpose of the line is to integrate the intermittent wind generation from the facility. MILW also owns two 362 kV/34.5 kV transformers, two 362 kV circuit breakers, and various isolation switches associated with the equipment.

This Notice of Penalty is being filed with the Commission because Western Electricity Coordinating Council (WECC) and MILW have entered into a Settlement Agreement to resolve all outstanding issues arising from WECC's determination and findings of the violations⁵ of EOP-005-1 R1, R2, R5, R6, and R7; FAC-001-0 R1 and R2; FAC-003-1 R1 and R2; PER-002-0 R2, R3, and R4; PER-003-0 R1; TOP-001-1 R1; and TOP-004-2 R6. According to the Settlement Agreement, MILW neither admits nor denies the violations, but has agreed to the assessed penalty of eighty-one thousand dollars (\$81,000), 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 violations identified as NERC Violation Tracking Identification Numbers WECC2012009491, WECC2012009492, WECC2012009480, WECC2012009481, WECC2012009482, WECC2012009485, WECC2012009486, WECC2012009488, WECC2012009489, WECC2012009585, WECC2012009586, WECC2012009587, WECC2012009494, WECC2012009496, and WECC2012009497 are being filed in accordance with the NERC Rules of Procedure and the CMEP.

Statement of Findings Underlying the Violations

This Notice of Penalty incorporates the findings and justifications set forth in the Settlement Agreement executed on April 29, 2013, by and between WECC and MILW, 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 (2013), NERC provides the following summary table identifying each violation of a Reliability Standard resolved by the Settlement Agreement, as discussed in greater detail below.

⁵ 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.

Region	Registered Entity	NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Total Penalty
Western Electricity Coordinating Council	Milford Wind Corridor Phase I, LLC	NOC-1891	WECC2012009491	EOP-005-1	R1	Medium	\$81,000
			WECC2012009492	EOP-005-1	R2	Medium	
			WECC2012009480	EOP-005-1	R5	Medium	
			WECC2012009481	EOP-005-1	R6	High	
			WECC2012009482	EOP-005-1	R7	High	
			WECC2012009485	FAC-001-0	R1	Medium	
			WECC2012009486	FAC-001-0	R2	Medium	
			WECC2012009488	FAC-003-1	R1	High	
			WECC2012009489	FAC-003-1	R2	High	
			WECC2012009585	PER-002-0	R2	High	
			WECC2012009586	PER-002-0	R3	High	
			WECC2012009587	PER-002-0	R4	High	
			WECC2012009494	PER-003-0	R1	High	
			WECC2012009496	TOP-001-1	R1	High	
WECC2012009497	TOP-004-2	R6	Medium				

EOP-005-1 R1, R2, R5, R6, and R7

The purpose statement of Reliability Standard EOP-005-1 provides: “To ensure plans, procedures, and resources are available to restore the electric system to a normal condition in the event of a partial or total shut down of the system.”

EOP-005-1 provides in pertinent part:

R1. Each Transmission Operator shall have a restoration plan to reestablish its electric system in a stable and orderly manner in the event of a partial or total shutdown of its system, including necessary operating instructions and procedures to cover emergency conditions, and the loss of vital telecommunications channels. Each Transmission Operator shall include the applicable elements listed in Attachment 1-EOP-005 in developing a restoration plan.

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R2. Each Transmission Operator shall review and update its restoration plan at least annually and whenever it makes changes in the power system network, and shall correct deficiencies found during the simulated restoration exercises.

R5. Each Transmission Operator and Balancing Authority shall periodically test its telecommunication facilities needed to implement the restoration plan.

R6. Each Transmission Operator and Balancing Authority shall train its operating personnel in the implementation of the restoration plan. Such training shall include simulated exercises, if practicable.

R7. Each Transmission Operator and Balancing Authority shall verify the restoration procedure by actual testing or by simulation.

EOP-005-1 R1, R2, and R5 each have a “Medium” Violation Risk Factor (VRF) and a “Severe” Violation Severity Level (VSL). EOP-005-1 R6 and R7 each have a “High” VRF and “Severe” VSL. The subject violations apply to MILW’s Transmission Operator (TOP) function.

On January 20, 2012, MILW submitted a Self-Certification listing violations of EOP-005-1 R1, R2, R5, R6, and R7. MILW did not have a restoration plan to reestablish its transmission system in a stable and orderly manner in the event of a partial or total shutdown of its transmission system in violation of EOP-005-1 R1. Because MILW did not have a restoration plan in place, MILW failed to: 1) undertake an annual review and update its restoration plan, in violation of EOP-005-1 R2; 2) undertake periodic testing of its telecommunication facilities needed to reestablish its transmission system in a stable and orderly manner in the event of a partial or total shutdown of its transmission system, in violation of EOP-005-1 R5; 3) undertake training of its personnel in the implementation of its restoration plan, in violation of EOP-005-1 R6; and 4) undertake verification of its restoration plan by actual testing or simulation, in violation of EOP-005-1 R7.

WECC determined the duration of the EOP-005-1 R1, R2, R5, and R7 violations to be from May 18, 2010 through September 17, 2012, when MILW completed its Mitigation Plans.⁶ WECC determined the

⁶ WECC determined the violation start date is May 18, 2010 for all of the violations included in this Settlement Agreement. The start date did not affect WECC's determination of the penalty.

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duration of the EOP-005-1 R6 violation to be from May 18, 2010 through October 19, 2012, when MILW completed its Mitigation Plan.

WECC determined that these violations posed a minimal and not serious or substantial risk to the reliability of the BPS. MILW did have a restoration plan; it just did not include all required elements. The generation restoration plan included components associated with MILW's generator tie line. If MILW were unable to deliver its generation, the host Balancing Authority (BA) could find replacement generation elsewhere without adversely affecting the reliability of the BPS. MILW's generation is not base-load generation. Because MILW's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to the lack of a restoration plan. Finally, MILW's generation is intermittent and its transmission facilities are limited in use.

FAC-001-0 R1 and R2

The purpose statement of Reliability Standard FAC-001-0 provides: "To avoid adverse impacts on reliability, Transmission Owners must establish facility connection and performance requirements."

FAC-001-0 R1 and R2 provide:

R1. The Transmission Owner shall document, maintain, and publish facility connection requirements to ensure compliance with NERC Reliability Standards and applicable Regional Reliability Organization,^[7] subregional, Power Pool, and individual Transmission Owner planning criteria and facility connection requirements. The Transmission Owner's facility connection requirements shall address connection requirements for:

R1.1. Generation facilities,

R1.2. Transmission facilities, and

R1.3. End-user facilities

R2. The Transmission Owner's facility connection requirements shall address, but are not limited to, the following items:

R2.1. Provide a written summary of its plans to achieve the required system performance as described above throughout the planning horizon:

⁷ Consistent with applicable FERC precedent, the term "Regional Reliability Organization" in this context refers to WECC.

R2.1.1. Procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems.

R2.1.2. Procedures for notification of new or modified facilities to others (those responsible for the reliability of the interconnected transmission systems) as soon as feasible.

R2.1.3. Voltage level and MW and MVAR capacity or demand at point of connection.

R2.1.4. Breaker duty and surge protection.

R2.1.5. System protection and coordination.

R2.1.6. Metering and telecommunications.

R2.1.7. Grounding and safety issues.

R2.1.8. Insulation and insulation coordination.

R2.1.9. Voltage, Reactive Power, and power factor control.

R2.1.10. Power quality impacts.

R2.1.11. Equipment Ratings.

R2.1.12. Synchronizing of facilities

R2.1.13. Maintenance coordination.

R2.1.14. Operational issues (abnormal frequency and voltages).

R2.1.15. Inspection requirements for existing or new facilities.

R2.1.16. Communications and procedures during normal and emergency operating conditions.

[Footnote added.]

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FAC-001-0 R1 and R2 each have a “Medium” VRF and “Severe” VSL. The subject violations apply to MILW’s Transmission Owner (TO) function.

On January 20, 2012, MILW submitted a Self-Certification listing violations of FAC-001-0 R1 and R2. MILW did not have in place documented facility connection requirements, in violation of FAC-001-0 R1. MILW did not have facility connection requirements that provide a written summary of its plans to avoid adverse system performance throughout the planning horizon and address the items in sub-requirements R2.1.1 through R2.1.16, in violation of FAC-001-0 R2.

WECC determined the duration of the violations to be from May 18, 2010 through March 15, 2012, when MILW completed its Mitigation Plans.

WECC determined that these violations posed a minimal and not serious or substantial risk to the reliability of the BPS. If MILW were unable to deliver its generation, the host BA could find replacement generation elsewhere without adversely affecting the reliability of the BPS. MILW’s generation is not base-load generation. Because MILW’s generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to the lack of a restoration plan. Finally, MILW’s generation is intermittent and its transmission facilities are limited in use.

FAC-003-1 R1 and R2

The purpose statement of Reliability Standard FAC-003-1 provides:

To improve the reliability of the electric transmission systems by preventing outages from vegetation located on transmission rights-of-way (ROW) and minimizing outages from vegetation located adjacent to ROW, maintaining clearances between transmission lines and vegetation on and along transmission ROW, and reporting vegetation-related outages of the transmission systems to the respective Regional Reliability Organizations (RRO) and the North American Electric Reliability Council (NERC).

FAC-003-1 R1 and R2 provide:

R1. The Transmission Owner shall prepare, and keep current, a formal transmission vegetation management program (TVMP). The TVMP shall include the Transmission Owner’s objectives, practices, approved procedures, and work specifications^[1].

R1.1. The TVMP shall define a schedule for and the type (aerial, ground) of ROW vegetation inspections. This schedule should be flexible enough to adjust for changing conditions. The inspection schedule shall be based on the anticipated growth of vegetation and any other environmental or operational factors that could impact the relationship of vegetation to the Transmission Owner's transmission lines.

R1.2. The Transmission Owner, in the TVMP, shall identify and document clearances between vegetation and any overhead, ungrounded supply conductors, taking into consideration transmission line voltage, the effects of ambient temperature on conductor sag under maximum design loading, and the effects of wind velocities on conductor sway. Specifically, the Transmission Owner shall establish clearances to be achieved at the time of vegetation management work identified herein as Clearance 1, and shall also establish and maintain a set of clearances identified herein as Clearance 2 to prevent flashover between vegetation and overhead ungrounded supply conductors.

R1.2.1. Clearance 1 — The Transmission Owner shall determine and document appropriate clearance distances to be achieved at the time of transmission vegetation management work based upon local conditions and the expected time frame in which the Transmission Owner plans to return for future vegetation management work. Local conditions may include, but are not limited to: operating voltage, appropriate vegetation management techniques, fire risk, reasonably anticipated tree and conductor movement, species types and growth rates, species failure characteristics, local climate and rainfall patterns, line terrain and elevation, location of the vegetation within the span, and worker approach distance requirements. Clearance 1 distances shall be greater than those defined by Clearance 2 below.

R1.2.2. Clearance 2 — The Transmission Owner shall determine and document specific radial clearances to be maintained between vegetation and conductors under all rated electrical operating conditions. These minimum clearance distances are necessary to prevent flashover between vegetation and conductors and will vary due to such factors as altitude and operating voltage. These Transmission Owner-specific minimum clearance distances shall be no less than those set forth in the

Institute of Electrical and Electronics Engineers (IEEE) Standard 516-2003 (Guide for Maintenance Methods on Energized Power Lines) and as specified in its Section 4.2.2.3, Minimum Air Insulation Distances without Tools in the Air Gap.

R1.2.2.1 Where transmission system transient overvoltage factors are not known, clearances shall be derived from Table 5, IEEE 516-2003, phase-to-ground distances, with appropriate altitude correction factors applied.

R1.2.2.2 Where transmission system transient overvoltage factors are known, clearances shall be derived from Table 7, IEEE 516-2003, phase-to-phase voltages, with appropriate altitude correction factors applied.

R1.3. All personnel directly involved in the design and implementation of the TVMP shall hold appropriate qualifications and training, as defined by the Transmission Owner, to perform their duties.

R1.4. Each Transmission Owner shall develop mitigation measures to achieve sufficient clearances for the protection of the transmission facilities when it identifies locations on the ROW where the Transmission Owner is restricted from attaining the clearances specified in Requirement 1.2.1.

R1.5. Each Transmission Owner shall establish and document a process for the immediate communication of vegetation conditions that present an imminent threat of a transmission line outage. This is so that action (temporary reduction in line rating, switching line out of service, etc.) may be taken until the threat is relieved.

R2. The Transmission Owner shall create and implement an annual plan for vegetation management work to ensure the reliability of the system. The plan shall describe the methods used, such as manual clearing, mechanical clearing, herbicide treatment, or other actions. The plan should be flexible enough to adjust to changing conditions, taking into consideration anticipated growth of vegetation and all other environmental factors that may have an impact on the reliability of the transmission systems. Adjustments to the plan shall be documented as they occur. The plan should take into

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consideration the time required to obtain permissions or permits from landowners or regulatory authorities. Each Transmission Owner shall have systems and procedures for documenting and tracking the planned vegetation management work and ensuring that the vegetation management work was completed according to work specifications.

[Footnote removed.]

FAC-003-1 R1 and R2 each have a “High” VRF and “Severe” VSL. The subject violations apply to MILW’s TO function.

On January 20, 2012, MILW submitted a Self-Certification listing violations of FAC-003-1 R1 and R2. MILW did not prepare and keep current a formal TVMP, in violation of FAC-003-1 R1. MILW also failed to create and implement an annual plan for vegetation management work to ensure the reliability of the BPS, in violation of FAC-003-1 R2.

WECC determined the duration of the violations to be from May 18, 2010 through April 25, 2012, when MILW completed its Mitigation Plans.

WECC determined that these violations posed a minimal and not serious or substantial risk to the reliability of the BPS. MILW is located in a desert region where vegetation growth does not typically reach the height of its transmission lines, therefore making any vegetation-related outages unlikely or rare occurrences. If MILW were unable to deliver its generation, the host BA could find replacement generation elsewhere without adversely affecting the reliability of the BPS. MILW’s generation is not base-load generation. Because MILW’s generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to the lack of a restoration plan. Finally, MILW’s generation is intermittent and its transmission facilities are limited in use.

PER-002-0 R2, R3, and R4

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 R2, R3, and R4 provide:

R2. Each Transmission Operator and Balancing Authority shall have a training program for all operating personnel that are in:

R2.1. Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.

R2.2. Positions directly responsible for complying with NERC standards.

R3. For personnel identified in Requirement R2, the Transmission Operator and Balancing Authority shall provide a training program meeting the following criteria:

R3.1. A set of training program objectives must be defined, based on NERC and Regional Reliability Organization standards, entity operating procedures, and applicable regulatory requirements. These objectives shall reference the knowledge and competencies needed to apply those standards, procedures, and requirements to normal, emergency, and restoration conditions for the Transmission Operator and Balancing Authority operating positions.

R3.2. The training program must include a plan for the initial and continuing training of Transmission Operator and Balancing Authority operating personnel. That plan shall address knowledge and competencies required for reliable system operations.

R3.3. The training program must include training time for all Transmission Operator and Balancing Authority operating personnel to ensure their operating proficiency.

R3.4. Training staff must be identified, and the staff must be competent in both knowledge of system operations and instructional capabilities.

R4. For personnel identified in Requirement R2, each Transmission Operator and Balancing Authority shall provide its operating personnel at least five days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.

PER-002-0 R2, R3, and R4 each have a "Medium" VRF and a "Severe" VSL. The subject violations apply to MILW's TOP function.

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On January 20, 2012, MILW submitted a Self-Certification listing violations of PER-002-0 R2, R3, and R4. MILW did not have a training program for all operating personnel, in violation of PER-002-0 R2 and R3. Because Milford did not have a training program for all operating personnel, it did not provide its operating personnel a program of training and drills using realistic simulations of system emergencies, in violation of PER-002-0 R4.

WECC determined the duration of the violations to be from May 18, 2010 through September 19, 2010, when MILW completed its Mitigation Plans.

WECC determined that these violations posed a minimal and not serious or substantial risk to the reliability of the BPS. If MILW were unable to deliver its generation, the host BA could find replacement generation elsewhere without adversely affecting the reliability of the BPS. MILW's generation is not base-load generation. Because MILW's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to the lack of a restoration plan. Finally, MILW's generation is intermittent and its transmission facilities are limited in use.

PER-003-0 R1

The purpose statement of Reliability Standard PER-003-0 provides: "Certification of operating personnel is necessary to ensure minimum competencies for operating a reliable Bulk Electric System."

PER-003-0 R1 provides:

R1. Each Transmission Operator, Balancing Authority, and Reliability Coordinator shall staff all operating positions that meet both of the following criteria with personnel that are NERC-certified for the applicable functions:

R1.1. Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.

R1.2. Positions directly responsible for complying with NERC standards.

PER-003-0 R1 has a "High" VRF and a "Severe" VSL. The subject violation applies to MILW's TOP function.

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On January 20, 2012, MILW submitted a Self-Certification listing a violation of PER-003-0 R1. MILW did not have personnel fully certified by NERC, in violation of PER-003-0 R1.

WECC determined the duration of the violation to be from May 18, 2010 through September 19, 2010, when MILW completed its Mitigation Plan.

WECC determined that these violations posed a minimal and not serious or substantial risk to the reliability of the BPS. If MILW were unable to deliver its generation, the host BA could find replacement generation elsewhere without adversely affecting the reliability of the BPS. MILW's generation is not base-load generation. Because MILW's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to the lack of a restoration plan. Finally, MILW's generation is intermittent and its transmission facilities are limited in use.

TOP-001-1 R1

The purpose statement of Reliability Standard TOP-001-1 provides: "To ensure reliability entities have clear decision-making authority and capabilities to take appropriate actions or direct the actions of others to return the transmission system to normal conditions during an emergency."

TOP-001-1 R1 provides: "Each Transmission Operator shall have the responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its area and shall exercise specific authority to alleviate operating emergencies."

TOP-001-1 R1 has a "High" VRF and a "Severe" VSL. The subject violation applies to MILW's TOP function.

On January 20, 2012, MILW submitted a Self-Certification listing a violation of TOP-001-1 R1. Not all of MILW's transmission operators had clear decision-making authority to take whatever actions were needed to ensure the reliability of MILW's area.

WECC determined the duration of the violation to be from May 18, 2010 through September 14, 2012, when MILW completed its Mitigation Plan.

WECC determined that these violations posed a minimal and not serious or substantial risk to the reliability of the BPS. If MILW were unable to deliver its generation, the host BA could find replacement generation elsewhere without adversely affecting the reliability of the BPS. MILW's generation is not base-load generation. Because MILW's generation is non-firm, the host BA has

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adequate provisions to cover any additional time the generation was unavailable due to the lack of a restoration plan. Finally, MILW's generation is intermittent and its transmission facilities are limited in use.

TOP-004-2 R6

The purpose statement of Reliability Standard TOP-004-2 provides: "To ensure that the transmission system is operated so that instability, uncontrolled separation, or cascading outages will not occur as a result of the most severe single Contingency and specified multiple Contingencies."

TOP-004-2 R6 provides:

R6. Transmission Operators, individually and jointly with other Transmission Operators, shall develop, maintain, and implement formal policies and procedures to provide for transmission reliability. These policies and procedures shall address the execution and coordination of activities that impact inter- and intra-Regional reliability, including:

R6.1. Monitoring and controlling voltage levels and real and reactive power flows.

R6.2. Switching transmission elements.

R6.3. Planned outages of transmission elements.

R6.4. Responding to IROL and SOL violations.

TOP-004-2 R6 has a "Medium" VRF and a "Severe" VSL. The subject violation applies to MILW's TOP function.

On January 20, 2012, MILW submitted a Self-Certification listing a violation of TOP-004-2 R6. MILW did not have in place formal policies and procedures to provide for transmission reliability, in violation of TOP-004-2 R6.

WECC determined the duration of the violation to be from May 18, 2010 through September 25, 2012, when MILW completed its Mitigation Plan.

WECC determined that these violations posed a minimal and not serious or substantial risk to the reliability of the BPS. If MILW were unable to deliver its generation, the host BA could find

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replacement generation elsewhere without adversely affecting the reliability of the BPS. MILW's generation is not base-load generation. Because MILW's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to the lack of a restoration plan. Finally, MILW's generation is intermittent and its transmission facilities are limited in use.

Regional Entity's Basis for Penalty

According to the Settlement Agreement, WECC has assessed a penalty of eighty-one thousand dollars (\$81,000) for the referenced violations. In reaching this determination, WECC considered the following factors:

1. the violations constituted MILW's first occurrence of violations of the subject NERC Reliability Standards;⁸
2. MILW was cooperative throughout the compliance enforcement process;
3. MILW had a compliance program at the time of the violations which WECC considered a mitigating factor;⁹
4. there was no evidence of any attempt to conceal a violation nor evidence of intent to do so;
5. the violations posed a minimal and not serious or substantial risk to the reliability of the BPS, as discussed above; and
6. there were no other mitigating or aggravating factors or extenuating circumstances that would affect the assessed penalty.

⁸ A Find, Fix, Track and Report informational filing addressing remediated issues for certain registered entities including noncompliance with PRC-005-1 R for MILW was filed with FERC under RC12-14-000 on July 31, 2012. The 60-day review period has passed.

⁹ First Wind, MILW's parent company, ensures that compliance activities are part of each employee's individual annual goals. MILW conducts three weekly compliance activities, including a standing weekly meeting with corporate executives. MILW updates its board of directors on a quarterly basis regarding compliance matters. MILW's compliance staff is included on emails and correspondence associated with operations events. MILW has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance issues. Furthermore, since the time of the violations addressed herein, MILW has taken steps to improve its compliance program further. MILW's parent company has dedicated additional resources to its compliance staff, and its existing compliance team has greater involvement in operational activities. MILW has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

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After consideration of the above factors, WECC determined that, in this instance, the penalty amount of eighty-one thousand dollars (\$81,000) is appropriate and bears a reasonable relation to the seriousness and duration of the violations.

Status of Mitigation Plans¹⁰

EOP-005-1 R1

MILW's Mitigation Plan to address its violation of EOP-005-1 R1 was submitted to WECC on August 6, 2012 with a proposed completion date of September 30, 2012. The Mitigation Plan was accepted by WECC on August 28, 2012 and approved by NERC on September 19, 2012. The Mitigation Plan for this violation is designated as WECCMIT007817 and was submitted as non-public information to FERC on September 20, 2012 in accordance with FERC orders.

MILW's Mitigation Plan required MILW to adopt an emergency restoration plan that provides for annual review, periodic testing of necessary telecommunications facilities, training of operating personnel, and verification of the restoration procedure by actual testing or simulation.

MILW certified on October 2, 2012 that the above Mitigation Plan requirements were completed on September 17, 2012. As evidence of completion of its Mitigation Plan, MILW submitted a copy of its System Restoration Plan.

On November 14, 2012, after reviewing MILW's submitted evidence, WECC verified that MILW's Mitigation Plan was completed on September 17, 2012.

EOP-005-1 R2

MILW's Mitigation Plan to address its violation of EOP-005-1 R2 was submitted to WECC on August 6, 2012 with a proposed completion date of September 30, 2012. The Mitigation Plan was accepted by WECC on August 21, 2012 and approved by NERC on September 11, 2012. The Mitigation Plan for this violation is designated as WECCMIT007818 and was submitted as non-public information to FERC on September 12, 2012 in accordance with FERC orders.

MILW's Mitigation Plan required MILW to adopt an emergency restoration plan that provides for annual review, periodic testing of necessary telecommunications facilities, training of operating personnel, and verification of the restoration procedure by actual testing or simulation.

¹⁰ See 18 C.F.R § 39.7(d)(7).

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MILW certified on October 2, 2012 that the above Mitigation Plan requirements were completed on September 17, 2012. As evidence of completion of its Mitigation Plan, MILW submitted a copy of its system restoration plan.

On October 25, 2012, after reviewing MILW's submitted evidence, WECC verified that MILW's Mitigation Plan was completed on September 17, 2012.

EOP-005-1 R5

MILW's Mitigation Plan to address its violation of EOP-005-1 R5 was submitted to WECC on August 6, 2012 with a proposed completion date of September 30, 2012. The Mitigation Plan was accepted by WECC on August 21, 2012 and approved by NERC on September 11, 2012. The Mitigation Plan for this violation is designated as WECCMIT007819 and was submitted as non-public information to FERC on September 12, 2012 in accordance with FERC orders.

MILW's Mitigation Plan required MILW to adopt an emergency restoration plan that provides for annual review, periodic testing of necessary telecommunications facilities, training of operating personnel, and verification of the restoration procedure by actual testing or simulation.

MILW certified on October 2, 2012 that the above Mitigation Plan requirements were completed on September 17, 2012. As evidence of completion of its Mitigation Plan, MILW submitted a copy of its system restoration plan.

On October 25, 2012, after reviewing MILW's submitted evidence, WECC verified that MILW's Mitigation Plan was completed on September 17, 2012.

EOP-005-1 R6

MILW's Mitigation Plan to address its violation of EOP-005-1 R6 was submitted to WECC on August 6, 2012 with a proposed completion date of September 30, 2012. The Mitigation Plan was accepted by WECC on August 27, 2012 and approved by NERC on September 19, 2012. The Mitigation Plan for this violation is designated as WECCMIT007820 and was submitted as non-public information to FERC on September 20, 2012 in accordance with FERC orders.

MILW's Mitigation Plan required MILW to adopt an emergency restoration plan that provides for annual review, periodic testing of necessary telecommunications facilities, training of operating personnel, and verification of the restoration procedure by actual testing or simulation.

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MILW certified on October 2, 2012 that the above Mitigation Plan requirements were completed on September 17, 2012. As evidence of completion of its Mitigation Plan, MILW submitted a copy of its system restoration plan.

On October 25, 2012, after reviewing MILW's submitted evidence, WECC verified that MILW's Mitigation Plan was completed on September 17, 2012.

EOP-005-1 R7

MILW's Mitigation Plan to address its violation of EOP-005-1 R7 was submitted to WECC on August 6, 2012 with a proposed completion date of September 30, 2012. The Mitigation Plan was accepted by WECC on August 21, 2012 and approved by NERC on September 21, 2012. The Mitigation Plan for this violation is designated as WECCMIT007821 and was submitted as non-public information to FERC on September 21, 2012 in accordance with FERC orders.

MILW's Mitigation Plan required MILW to adopt an emergency restoration plan that provides for annual review, periodic testing of necessary telecommunications facilities, training of operating personnel, and verification of the restoration procedure by actual testing or simulation.

MILW certified on October 2, 2012 that the above Mitigation Plan requirements were completed on September 17, 2012. As evidence of completion of its Mitigation Plan, MILW submitted a copy of its system restoration plan.

On October 25, 2012, after reviewing MILW's submitted evidence, WECC verified that MILW's Mitigation Plan was completed on September 17, 2012.

FAC-001-0 R1

MILW's Mitigation Plan to address its violation of FAC-001-0 R1 was submitted to WECC on August 6, 2012 stating it had been completed on March 15, 2012. The Mitigation Plan was accepted by WECC on August 23, 2012 and approved by NERC on September 19, 2012. The Mitigation Plan for this violation is designated as WECCMIT007822 and was submitted as non-public information to FERC on September 20, 2012 in accordance with FERC orders.

MILW's Mitigation Plan required MILW to document its facility connection requirements for its generation, transmission, and end-user facilities.

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MILW certified on October 2, 2012 that the above Mitigation Plan requirements were completed on April 25, 2012. As evidence of completion of its Mitigation Plan, MILW submitted its facility connection requirements document, line inspections, and training documents.

On November 14, 2012, after reviewing MILW's submitted evidence, WECC verified that MILW's Mitigation Plan was completed on March 15, 2012.

FAC-001-0 R2

MILW's Mitigation Plan to address its violation of FAC-001-0 R2 was submitted to WECC on August 6, 2012 stating it had been completed on March 15, 2012. The Mitigation Plan was accepted by WECC on August 23, 2012 and approved by NERC on September 19, 2012. The Mitigation Plan for this violation is designated as WECCMIT007823 and was submitted as non-public information to FERC on September 20, 2012 in accordance with FERC orders.

MILW's Mitigation Plan required MILW to document its facility connection requirements for its generation, transmission, and end-user facilities.

MILW certified on October 2, 2012 that the above Mitigation Plan requirements were completed on March 15, 2012. As evidence of completion of its Mitigation Plan, MILW submitted its facility connection requirements document.

On October 25, 2012, after reviewing MILW's submitted evidence, WECC verified that MILW's Mitigation Plan was completed on March 15, 2012.

FAC-003-1 R1

MILW's Mitigation Plan to address its violation of FAC-003-1 R1 was submitted to WECC on August 6, 2012 stating it had been completed on April 25, 2012. The Mitigation Plan was accepted by WECC on August 23, 2012 and approved by NERC on September 19, 2012. The Mitigation Plan for this violation is designated as WECCMIT007824 and was submitted as non-public information to FERC on September 20, 2012 in accordance with FERC orders.

MILW's Mitigation Plan required MILW to adopt and implement a formal TVMP, complete 2012 required vegetation management inspection in accordance with the adopted vegetation management program, and complete a vegetation management training program.

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MILW certified on October 2, 2012 that the above Mitigation Plan requirements were completed on April 25, 2012. As evidence of completion of its Mitigation Plan, MILW submitted the following:

1. MILW's formal TVMP;
2. MILW's two FAC-003 line-1 2012 line inspection documents;
3. Five vegetation management training program documents; and
4. MILW's 2012 line vegetation management document.

On October 25, 2012, after reviewing MILW's submitted evidence, WECC verified that MILW's Mitigation Plan was completed on April 25, 2012.

FAC-003-1 R2

MILW's Mitigation Plan to address its violation of FAC-003-0 R2 was submitted to WECC on August 6, 2012 stating it had been completed on April 25, 2012. The Mitigation Plan was accepted by WECC on August 23, 2012 and approved by NERC on September 19, 2012. The Mitigation Plan for this violation is designated as WECCMIT007825 and was submitted as non-public information to FERC on September 20, 2012 in accordance with FERC orders.

MILW's Mitigation Plan required MILW to adopt and implement a formal TVMP, complete 2012 required vegetation management inspection in accordance with the adopted TVMP, and complete a vegetation management training program.

MILW certified on October 2, 2012 that the above Mitigation Plan requirements were completed on April 25, 2012. As evidence of completion of its Mitigation Plan, MILW submitted the following:

1. MILW's formal TVMP;
2. MILW's two FAC-003 line-1 2012 line inspection documents;
3. Five vegetation management training program documents; and
4. MILW's 2012 line vegetation management document.

On October 25, 2012, after reviewing MILW's submitted evidence, WECC verified that MILW's Mitigation Plan was completed on April 25, 2012.

PER-002-0 R2

MILW's Mitigation Plan to address its violation of PER-002-0 R2 was submitted to WECC on August 6, 2012 with a proposed completion date of September 30, 2012. The Mitigation Plan was accepted by

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WECC on July 27, 2012 and approved by NERC on September 19, 2012. The Mitigation Plan for this violation is designated as WECCMIT007827 and was submitted as non-public information to FERC on September 20, 2012 in accordance with FERC orders.

MILW's Mitigation Plan required MILW to adopt a formal operator training program that provides for training of all relevant personnel under R2, based on the required curriculum meeting the requirements under PER-002-0 R3, and for the required number of training hours each year.

MILW certified on October 3, 2012 that the above Mitigation Plan requirements were completed on September 19, 2012. As evidence of completion of its Mitigation Plan, MILW submitted its formal operator training program.

On October 25, 2012, after reviewing MILW's submitted evidence, WECC verified that MILW's Mitigation Plan was completed on September 19, 2012.

PER-002-0 R3

MILW's Mitigation Plan to address its violation of PER-002-0 R3 was submitted to WECC on August 6, 2012 with a proposed completion date of September 30, 2012. The Mitigation Plan was accepted by WECC on August 28, 2012 and approved by NERC on September 19, 2012. The Mitigation Plan for this violation is designated as WECCMIT007828 and was submitted as non-public information to FERC on September 20, 2012 in accordance with FERC orders.

MILW's Mitigation Plan required MILW to adopt a formal operator training program that provides for training of all relevant personnel under R2, based on the required curriculum meeting the requirements under PER-002-0 R3, and for the required number of training hours each year.

MILW certified on October 3, 2012 that the above Mitigation Plan requirements were completed on September 19, 2012. As evidence of completion of its Mitigation Plan, MILW submitted its formal operator training program.

On October 25, 2012, after reviewing MILW's submitted evidence, WECC verified that MILW's Mitigation Plan was completed on September 19, 2012.

PER-002-0 R4

MILW's Mitigation Plan to address its violation of PER-002-0 R4 was submitted to WECC on August 6, 2012 with a proposed completion date of September 30, 2012. The Mitigation Plan was accepted by WECC on August 28, 2012 and approved by NERC on September 19, 2012. The Mitigation Plan for this

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violation is designated as WECCMIT007829 and was submitted as non-public information to FERC on September 20, 2012 in accordance with FERC orders.

MILW's Mitigation Plan required MILW to adopt a formal operator training program that provides for training of all relevant personnel under R2, based on the required curriculum meeting the requirements under PER-002-0 R3, and for the required number of training hours each year.

MILW certified on October 3, 2012 that the above Mitigation Plan requirements were completed on September 19, 2012. As evidence of completion of its Mitigation Plan, MILW submitted its formal operator training program.

On October 25, 2012, after reviewing MILW's submitted evidence, WECC verified that MILW's Mitigation Plan was completed on September 19, 2012.

PER-003-0 R1

MILW's Mitigation Plan to address its violation of PER-003-0 R1 was submitted to WECC on August 6, 2012 with a proposed completion date of September 30, 2012. The Mitigation Plan was accepted by WECC on August 27, 2012 and approved by NERC on September 19, 2012. The Mitigation Plan for this violation is designated as WECCMIT007830 and was submitted as non-public information to FERC on September 20, 2012 in accordance with FERC orders.

MILW's Mitigation Plan required MILW to provide a training program that includes the requirement for NERC certification and continuing education hours to maintain the NERC certification. In addition, the Mitigation Plan required MILW to have at least one NERC-certified operator per shift managing transmission operations.

MILW certified on October 3, 2012 that the above Mitigation Plan requirements were completed on September 19, 2012. As evidence of completion of its Mitigation Plan, MILW submitted the following:

1. MILW's training program; and
2. NERC certification exam sheets for six MILW operators.

On October 25, 2012, after reviewing MILW's submitted evidence, WECC verified that MILW's Mitigation Plan was completed on September 19, 2012.

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TOP-001-1 R1

MILW's Mitigation Plan to address its violation of TOP-001-1 R1 was submitted to WECC on August 6, 2012 with a proposed completion date of September 30, 2012. The Mitigation Plan was accepted by WECC on August 20, 2012 and approved by NERC on September 11, 2012. The Mitigation Plan for this violation is designated as WECCMIT007831 and was submitted as non-public information to FERC on September 12, 2012 in accordance with FERC orders.

MILW's Mitigation Plan required MILW to adopt a letter of authority and subsequently post the letter of authority in its control room.

MILW certified on October 3, 2012 that the above Mitigation Plan requirements were completed on September 14, 2012. As evidence of completion of its Mitigation Plan, MILW submitted the following:

1. 10 03 2012 - Re Letter of authority per TOP-001.msg
2. 10 03 2012 - NERC Certified Operators Letter of Authority.pdf

On October 25, 2012, after reviewing MILW's submitted evidence, WECC verified that MILW's Mitigation Plan was completed on September 14, 2012.

TOP-004-2 R6

MILW's Mitigation Plan to address its violation of TOP-004-2 R6 was submitted to WECC on August 6, 2012 with a proposed completion date of September 30, 2012. The Mitigation Plan was accepted by WECC on August 27, 2012 and approved by NERC on January 30, 2013. The Mitigation Plan for this violation is designated as WECCMIT007832 and was submitted as non-public information to FERC on January 30, 2013 in accordance with FERC orders.

MILW's Mitigation Plan required MILW to adopt and implement a transmission operators' manual that provides policies and procedures that address the execution and coordination of activities that impact inter- and intra-regional reliability.

MILW certified on October 3, 2012 that the above Mitigation Plan requirements were completed on September 25, 2012. As evidence of completion of its Mitigation Plan, MILW submitted its transmission operators' manual.

On October 25, 2012, after reviewing MILW's submitted evidence, WECC verified that MILW's Mitigation Plan was completed on September 25, 2012.

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Statement Describing the Assessed Penalty, Sanction or Enforcement Action Imposed¹¹

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,¹² the NERC BOTCC reviewed the Settlement Agreement and supporting documentation on June 11, 2013. The NERC BOTCC approved the Settlement Agreement, including WECC's assessment of an eighty-one thousand dollar (\$81,000) financial penalty against MILW 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 violations at issue.

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

1. the violations constituted MILW's first occurrence of violations of the subject NERC Reliability Standards;
2. WECC reported that MILW was cooperative throughout the compliance enforcement process;
3. MILW had a compliance program at the time of the violations which WECC considered a mitigating factor, as discussed above;
4. there was no evidence of any attempt to conceal a violation nor evidence of intent to do so;
5. WECC determined that the violations posed a minimal and not a serious or substantial risk to the reliability of the BPS, as discussed above; and
6. WECC 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 eighty-one thousand dollars (\$81,000) is appropriate for the violations and circumstances at issue, and is consistent with NERC's goal to promote and ensure reliability of the BPS.

¹¹ See 18 C.F.R. § 39.7(d)(4).

¹² *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).

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

- a) Settlement Agreement by and between WECC and MILW executed April 29, 2013, included as Attachment a;
- b) MILW's Self-Certification document dated January 20, 2012, included as Attachment b;
- c) Record documents for the violation of EOP-005-1 R1, included as Attachment c:
 1. MILW's Mitigation Plan designated as WECCMIT007817 submitted August 6, 2012;
 2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012;
 3. WECC's Verification of Mitigation Plan Completion dated November 14, 2012;
- d) Record documents for the violation of EOP-005-1 R2, included as Attachment d:
 1. MILW's Mitigation Plan designated as WECCMIT007818 submitted August 6, 2012;
 2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012;
 3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012;
- e) Record documents for the violation of EOP-005-1 R5, included as Attachment e:
 1. MILW's Mitigation Plan designated as WECCMIT007819 submitted August 6, 2012;
 2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012;
 3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012;
- f) Record documents for the violation of EOP-005-1 R6, included as Attachment f:
 1. MILW's Mitigation Plan designated as WECCMIT007820 submitted August 6, 2012;
 2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012;
 3. WECC's Verification of Mitigation Plan Completion dated November 14, 2012;
- g) Record documents for the violation of EOP-005-1 R7, included as Attachment g:
 1. MILW's Mitigation Plan designated as WECCMIT007821 submitted August 6, 2012;

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2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012;
 3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012;
- h) Record documents for the violation of FAC-001-0 R1, included as Attachment h:
1. MILW's Mitigation Plan designated as WECCMIT007822 submitted August 6, 2012;
 2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012;
 3. WECC's Verification of Mitigation Plan Completion dated November 14, 2012;
- i) Record documents for the violation of FAC-001-0 R2, included as Attachment i:
1. MILW's Mitigation Plan designated as WECCMIT007823 submitted August 6, 2012;
 2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012;
 3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012;
- j) Record documents for the violation of FAC-003-1 R1, included as Attachment j:
1. MILW's Mitigation Plan designated as WECCMIT007824 submitted August 6, 2012;
 2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012;
 3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012;
- k) Record documents for the violation of FAC-003-1 R2, included as Attachment k:
1. MILW's Mitigation Plan designated as WECCMIT007825 submitted August 6, 2012;
 2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012;
 3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012;
- l) Record documents for the violation of PER-002-0 R2, included as Attachment l:
1. MILW's Mitigation Plan designated as WECCMIT007827 submitted August 6, 2012;
 2. MILW's Certification of Mitigation Plan Completion dated October 3, 2012;
 3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012;
- m) Record documents for the violation of PER-002-0 R3, included as Attachment m:
1. MILW's Mitigation Plan designated as WECCMIT007828 submitted August 6, 2012;
 2. MILW's Certification of Mitigation Plan Completion dated October 3, 2012;
 3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012;

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- n) Record documents for the violation of PER-002-0 R4, included as Attachment n:
 - 1. MILW's Mitigation Plan designated as WECCMIT007829 submitted August 6, 2012;
 - 2. MILW's Certification of Mitigation Plan Completion dated October 3, 2012;
 - 3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012;
- o) Record documents for the violation of PER-003-0 R1, included as Attachment o:
 - 1. MILW's Mitigation Plan designated as WECCMIT007830 submitted August 6, 2012;
 - 2. MILW's Certification of Mitigation Plan Completion dated October 3, 2012;
 - 3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012;
- p) Record documents for the violation of TOP-001-1 R1, included as Attachment p:
 - 1. MILW's Mitigation Plan designated as WECCMIT007831 submitted August 6, 2012;
 - 2. MILW's Certification of Mitigation Plan Completion dated October 3, 2012;
 - 3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012;
- q) Record documents for the violation of TOP-004-2 R6, included as Attachment q:
 - 1. MILW's Mitigation Plan designated as WECCMIT007832 submitted August 6, 2012;
 - 2. MILW's Certification of Mitigation Plan Completion dated October 3, 2012; and
 - 3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012.

A Form of Notice Suitable for Publication¹³

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

¹³ See 18 C.F.R § 39.7(d)(6).

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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 President and Chief Executive Officer North American Electric Reliability Corporation 3353 Peachtree Road NE Suite 600, North Tower Atlanta, GA 30326 (404) 446-2560</p>	<p>Sonia C. Mendonça* Assistant General Counsel and Director of Enforcement North American Electric Reliability Corporation 1325 G Street N.W. Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile sonia.mendonca@nerc.net</p>
<p>Charles A. Berardesco* Senior Vice President and General Counsel North American Electric Reliability Corporation 1325 G Street N.W., Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile charles.berardesco@nerc.net</p>	<p>Edwin G. Kichline* North American Electric Reliability Corporation Senior Counsel and Associate Director, Enforcement Processing 1325 G Street N.W. Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile edwin.kichline@nerc.net</p>
<p>Mark Maher* Chief Executive Officer Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (360) 213-2673 (801) 582-3918 – facsimile Mark@wecc.biz</p>	<p>Christopher Luras* Director of Enforcement Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6887 (801) 883-6894 – facsimile CLuras@wecc.biz</p>
<p>Constance White* Vice President of Compliance Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6855 (801) 883-6894 – facsimile CWhite@wecc.biz</p>	

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Milford Wind Corridor Phase I, LLC
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regulatory@firstwind.com

*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.

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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/ Sonia Mendonça

Sonia C. Mendonça
Assistant General Counsel and Director of
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cc: Milford Wind Corridor Phase I, LLC
Western Electricity Coordinating Council

Attachments

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SETTLEMENT AGREEMENT
OF
WESTERN ELECTRICITY COORDINATING COUNCIL
AND
Milford Wind Corridor Phase I, LLC

Western Electricity Coordinating Council ("WECC") and Milford Wind Corridor Phase I, LLC ("MILW" or "Milford") (collectively the "Parties") hereby enter into this Settlement Agreement ("Agreement") on this 29th day of April, 2013.

RECITALS

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

Reliability Standard	NERC Violation Tracking Identification Numbers	WECC Tracking Identification Numbers	Reliability Standard Title
EOP-005-1 R1	WECC2012009491	WECC2012-612035	System Restoration Plans
EOP-005-1 R2	WECC2012009492	WECC2012-612036	System Restoration Plans
EOP-005-1 R5	WECC2012009480	WECC2012-612024	System Restoration Plans
EOP-005-1 R6	WECC2012009481	WECC2012-612025	System Restoration Plans
EOP-005-1 R7	WECC2012009482	WECC2012-612026	System Restoration Plans
FAC-001-0 R1	WECC2012009485	WECC2012-612029	Facility Connection Requirements
FAC-001-0 R2	WECC2012009486	WECC2012-612030	Facility Connection Requirements
FAC-003-1 R1	WECC2012009488	WECC2012-612032	Transmission Vegetation Management Program
FAC-003-1 R2	WECC2012009489	WECC2012-612033	Transmission Vegetation Management Program
PER-002-0 R2	WECC2012009585	WECC2012-612039	Operating Personnel Training
PER-002-0 R3	WECC2012009586	WECC2012-612040	Operating Personnel Training
PER-002-0 R4	WECC2012009587	WECC2012-612041	Operating Personnel

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			Training
PER-003-0 R1	WECC2012009494	WECC2012-612042	Operating Personnel Credentials
TOP-001-1 R1	WECC2012009496	WECC2012-612044	Reliability Responsibilities and Authorities
TOP-004-2 R6	WECC2012009497	WECC2012-612045	Transmission Operations

B. MILW is a Delaware Limited Liability Company and its principal offices are located in Boston, Massachusetts. MILW was registered on the NERC Compliance Registry on October 23, 2009 as a Generator Owner; and on February 18, 2010 as a Transmission Owner and Transmission Operator.

C. WECC was formed on April 18, 2002 by the merger of the Western Systems Coordinating Council, Southwest Regional Transmission Association, and Western Regional Transmission Association. WECC is one of eight Regional Entities in the United States responsible for coordinating and promoting electric system reliability and enforcing the mandatory Reliability Standards created by NERC under the authority granted in Section 215 of the Federal Power Act. 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 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. Thus, for the purposes of this agreement, MILW agrees to resolve the disputed matters pursuant to the terms of this settlement agreement. Notwithstanding the determinations by WECC described in this document, MILW neither admits nor denies that its actions or non-actions constitute a violation of the Reliability Standards.

Nothing contained in this Agreement shall be construed as a waiver of either party's rights, except as otherwise contained herein, provided, however, that nothing in this Agreement shall limit or prevent WECC from evaluating MILW for subsequent violations of the same Reliability Standards addressed herein and taking enforcement action, if necessary. Such future enforcement action could include assessing penalties against MILW for subsequent violations of the Reliability Standards addressed herein in accordance with NERC Rules of Procedure, which can include consideration of the violations resolved herein as prior non-compliance with Reliability Standards.

NOW, THEREFORE, in consideration of the terms set forth herein WECC and MILW hereby agree and stipulate to the following:

CONFIDENTIAL**I. Stipulated Facts****A. NERC Reliability Standard EOP-005-1 Requirement 1**

R1: Each Transmission Operator shall have a restoration plan to reestablish its electric system in a stable and orderly manner in the event of a partial or total shutdown of its system, including necessary operating instructions and procedures to cover emergency conditions, and the loss of vital telecommunications channels. Each Transmission Operator shall include the applicable elements listed in Attachment 1-EOP-005 in developing a restoration plan.

STIPULATED FACTS

1. On January 20, 2012, Milford self-certified potential noncompliance with EOP-005-1 R1. Subsequently, WECC Enforcement issued to Milford a Data Request Form, requesting additional information regarding Milford's potential noncompliance with EOP-005-1 R1. On March 1, 2012, Milford responded to WECC Enforcement's Data Request Form stating that, "[u]pon applicability of EOP-005-1 R1, Milford did not have in place a restoration plan to reestablish its transmission system in a stable and orderly manner in the event of a partial or total shutdown of its transmission system. Milford is working diligently to ensure that it is in full compliance with EOP-005-1 R1. Specifically, Milford is establishing a restoration plan consistent with this requirement."¹ On March 12, 2012 a WECC Subject Matter Expert (SME) reviewed Milford's self-certification and response to WECC's Data Request Form. The WECC SME concluded that Milford was in violation of EOP-005-1 R1 because it did not have a restoration plan that complied with EOP-005-1 R1 and referred the matter to Enforcement.

WECC'S DETERMINATION

2. Enforcement has reviewed the WECC SME's conclusions, as well as Milford's self-certification and response to WECC's Data Request Form. Milford's self-certification and response to WECC's Data Request Form make clear that Milford did not have a restoration plan when it self-certified on January 20, 2012. Accordingly, WECC Enforcement has determined that Milford was in violation of EOP-005-1 R1 for failing to have a restoration plan that complied with EOP-005-1 R1. Because Milford has not produced a restoration plan that complied, at any point in the relevant timeframe, with EOP-005-1 R1, WECC Enforcement has determined that Milford was in violation of EOP-005-1 R1 for the period from May 18, 2010 to September 17, 2012, when MILW completed its Mitigation Plan.

¹ Data Request Form, EOP-005-1 R1 (March 1, 2012).

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MITIGATION PLAN DETAILS

3. On August 6, 2012, MILW submitted a Mitigation Plan with a proposed completion date of September 30, 2012. The Mitigation Plan required MILW to adopt an emergency restoration plan that provides for annual review, periodic testing of necessary telecommunications facilities, training of operating personnel, and verification of the restoration procedure by actual testing or simulation. On September 4, 2012, WECC sent MILW notification of Mitigation Plan Acceptance. On November 14, 2012, WECC sent MILW notification of acceptance of Certification of Mitigation Plan Completion and confirmed the actual completion date as September 17, 2012.

RELIABILITY IMPACT STATEMENT

4. Milford generates power from ninety-seven wind turbines, having a generation capacity of 306 MW. Milford's generation is connected to the BES by Milford's 88 mile, 345 kV transmission line. The sole purpose of this line is to integrate the intermittent wind generation from the facility; the line is radial in nature and does not serve any load. Because Milford's generation is intermittent, the transmission involved is limited in use. The failure to have a restoration plan could lengthen the time required to reactivate the transmission line in the event of an outage and prevent 306 MW from being delivered to the BES. However, because Milford's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to lack of a restoration plan. In other words, Milford's generation is not base-load generation. Thus, if Milford was unable to deliver its generation, its BA could simply find replacement generation elsewhere or choose not to replace such generation without adversely affecting the reliability of the bulk power system. Further, while Milford did not have a wholly-compliant restoration plan, Milford did have a restoration plan associated with its generator operations and Milford trained its generator operators on the details of the generation restoration plan. The generation restoration plan included components associated with Milford's generator tie line. For these reasons, WECC determined that this violation posed a minimal risk to the BES.

PENALTY CONSIDERATIONS

5. The Violation Risk Factor ("VRF") is Medium, the Violation Severity Level ("VSL") is Severe, and this violation posed minimal risk to the reliability of the BES.

The violation duration is as described above.

MITIGATING FACTORS

6. In assessing the penalty described herein, WECC considered Milford's internal compliance program. Specifically, WECC determined a mitigating factor was warranted for Milford's program based on the following factors: Milford's parent company ensures that compliance activities are part of each employee's individual annual goals. Milford conducts three weekly compliance activities, including a standing weekly meeting with

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corporate executives. Milford updates its board of directors on a quarterly basis regarding compliance matters. Milford's compliance staff is included on emails and correspondence associated with operations events. Milford has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance issues. Furthermore, since the time of the violations addressed herein, Milford has taken steps to further improve its compliance program. Milford's parent company has dedicated additional resources to its compliance staff and its existing compliance team has greater involvement in operational activities. Milford has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

Enforcement determined there were no aggravating factors warranting a penalty higher than the proposed penalty.

MILW was cooperative throughout the process.

MILW did not fail to complete any applicable compliance directives.

There was no evidence of any attempt by MILW to conceal the violation.

There was no evidence that MILW's violation was intentional.

WECC is not aware of any violations of this Reliability Standard by MILW affiliates or any involvement in MILW's activities such that this violation by MILW should be treated as recurring conduct.

B. NERC Reliability Standard EOP-005-1 Requirement 2

R2: Each Transmission Operator shall review and update its restoration plan at least annually and whenever it makes changes in the power system network, and shall correct deficiencies found during the simulated restoration exercises

STIPULATED FACTS

1. On January 20, 2012, Milford self-certified potential noncompliance with EOP-005-1 R2. Subsequently, WECC sent Milford a Data Request Form requesting additional information. On March 1, 2012, Milford responded to WECC's Data Request Form. In its response, Milford stated that, "Milford did not undertake an annual review and update of its restoration plan because it did not have in place a restoration plan to reestablish its transmission system in a stable and orderly manner in the event of a partial or total shutdown of its transmission system."² On May 3, 2012 a WECC SME reviewed Milford's self-certification and response to WECC's Data Request Form. The WECC SME concluded that Milford was in violation of EOP-005-1 R2 because it did not review its restoration plan annually and referred the matter to WECC Enforcement.

² Data Request Form, EOP-005-1 R2 (March 1, 2012).

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WECC'S DETERMINATION

2. WECC Enforcement has reviewed the WECC SME's finding, as well as Milford's self-certification and response to WECC's Data Request Form. WECC Enforcement has determined that Milford was in violation of EOP-005-1 R2 for failing to review its restoration plan annually. Milford did not have a restoration plan and, therefore, it could not have, and did not, review it annually. Enforcement has further determined that Milford was in violation of EOP-005-1 R2 for the period from May 18, 2010 to September 17, 2012, when MILW completed its Mitigation Plan.

MITIGATION PLAN DETAILS

3. On August 6, 2012, MILW submitted a Mitigation Plan with a proposed completion date of September 30, 2012. The Mitigation Plan required MILW to create and implement an emergency restoration plan. On August 24, 2012, WECC sent a notification to MILW accepting its Mitigation Plan. On October 2, 2012, WECC sent MILW notification of Mitigation Plan Acceptance. On October 25, 2012, WECC sent notification to MILW accepting its Certification of Mitigation Plan completion and confirming the Mitigation Plan completion date as September 17, 2012.

RELIABILITY IMPACT STATEMENT

4. A Transmission Operator is required to review and update its restoration plan at least annually and whenever it makes changes in the power system network and to correct deficiencies. If an entity does not perform its review and update its restoration plan the entity cannot ensure that its plans, procedures, and resources are available to restore its electrical system to normal conditions after a system emergency. Milford generates power from ninety-seven wind turbines, having a generation capacity of 306 MW. Milford's generation is connected to the BES by the Milford's 88 mile, 345 kV transmission line. The sole purpose of this line is to integrate the intermittent wind generation from the facility; the line is radial in nature and does not serve any load. Because Milford's generation is intermittent, the transmission involved is limited in use. The failure to have a restoration plan and update it annually could lengthen the time required to reactivate the transmission line in the event of an outage and prevent 306 MW from being delivered to the BES. However, because Milford's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to lack of a restoration plan. In other words, Milford's generation is not base-load generation. Thus, if Milford was unable to deliver its generation, its BA could simply find replacement generation elsewhere or choose not to replace such generation without adversely affecting the reliability of the bulk power system. Because Milford's generation is replaceable, WECC determined that this violation posed a minimal risk to the BES.

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PENALTY CONSIDERATIONS

5. The Violation Risk Factor ("VRF") is Medium, the Violation Severity Level ("VSL") is Severe, and this violation posed minimal risk to the reliability of the BES.

The violation duration is as described above.

MITIGATING FACTORS

6. In assessing the penalty described herein, WECC considered Milford's internal compliance program. Specifically, WECC determined a mitigating factor was warranted for Milford's program based on the following factors: Milford's parent company ensures that compliance activities are part of each employee's individual annual goals. Milford conducts three weekly compliance activities, including a standing weekly meeting with corporate executives. Milford updates its board of directors on a quarterly basis regarding compliance matters. Milford's compliance staff is included on emails and correspondence associated with operations events. Milford has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance issues. Furthermore, since the time of the violations addressed herein, Milford has taken steps to further improve its compliance program. Milford's parent company has dedicated additional resources to its compliance staff and its existing compliance team has greater involvement in operational activities. Milford has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

Enforcement determined there were no aggravating factors warranting a penalty higher than the proposed penalty.

MILW was cooperative throughout the process.

MILW did not fail to complete any applicable compliance directives.

There was no evidence of any attempt by MILW to conceal the violation.

There was no evidence that MILW's violation was intentional.

WECC is not aware of any violations of this Reliability Standard by MILW affiliates or any involvement in MILW's activities such that this violation by MILW should be treated as recurring conduct.

C. NERC Reliability Standard EOP-005-1 Requirement 5

R5: *Each Transmission Operator and Balancing Authority shall periodically test its telecommunication facilities needed to implement the restoration plan.*

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STIPULATED FACTS

1. On January 20, 2012, Milford self-certified a possible violation of EOP-005-1 R5. Subsequently, WECC sent Milford a Data Request Form seeking additional information regarding Milford's self-certification. On March 1, 2012, Milford responded to WECC's Data Request and stated that, "Milford did not undertake periodic testing of its telecommunication facilities needed to reestablish its transmission system in a stable and orderly manner in the event of a partial or total shutdown of its transmission system."³ On March 13, 2012, a WECC SME reviewed Milford's self-certification and response to WECC's Data Request Form. The WECC SME concluded that Milford was in violation of EOP-005-1 R5 for failing to periodically test its transmission facilities needed to implement its restoration plan and referred the matter to Enforcement.

WECC'S DETERMINATION

2. Enforcement has reviewed the WECC SME's findings, as well as Milford's self-certification and response to WECC's Data Request Form. Enforcement has determined that Milford was in violation of EOP-005-1 R5 because it failed to periodically test its transmission facilities needed to implement its restoration plan. Milford did not have a restoration plan and, therefore, it could not have, and did not, conduct these tests. Enforcement has further determined that Milford was in violation of EOP-005-1 R5 for the period from May 18, 2010 to September 17, 2012, when MILW completed its Mitigation Plan.

MITIGATION PLAN DETAILS

3. On August 6, 2012, MILW submitted a Mitigation Plan to WECC with a proposed completion date of September 30, 2012. The Mitigation Plan required MILW to create and implement an emergency restoration plan. On August 24, 2012, WECC sent MILW notification of Mitigation Plan Acceptance. On October 2, 2012, MILW submitted a Certification of Mitigation Plan Completion to WECC. On October 25, 2012, WECC sent notification to MILW accepting its Certification of Mitigation Plan completion and confirmed the actual completion date of the Mitigation Plan as September 17, 2012.

RELIABILITY IMPACT STATEMENT

4. A Transmission Operator is required to periodically test its transmission facilities needed to implement its restoration plan. If an entity does not periodically test its transmission facilities needed to implement its restoration plan it cannot be sure those transmission facilities will be functional if restoration is required. Milford generates power from ninety-seven wind turbines, having a generation capacity of 306 MW. Milford's generation is connected to the BES by the Milford's 88 mile, 345 kV transmission line. The sole purpose of this line is to integrate the intermittent wind generation from the facility; the line is radial in nature and does not serve any load.

³ Data Request Form, EOP-005-1 R5 (March 1, 2012).

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Because Milford's generation is intermittent, the transmission involved is limited in use. The failure to periodically test transmission facilities needed to implement restoration could lengthen the time required to reactivate the transmission line in the event of an outage and prevent 306 MW from being delivered to the BES. However, because Milford's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to lack of a restoration plan. In other words, Milford's generation is not base-load generation. Thus, if Milford was unable to deliver its generation, its BA could simply find replacement generation elsewhere or choose not to replace such generation without adversely affecting the reliability of the bulk power system. Because Milford's generation is replaceable, WECC determined that this violation posed a minimal risk to the BES.

PENALTY CONSIDERATIONS

5. The Violation Risk Factor ("VRF") is Medium, the Violation Severity Level ("VSL") is Severe, and this violation posed minimal risk to the reliability of the BES.

The violation duration is as described above.

MITIGATING FACTORS

6. In assessing the penalty described herein, WECC considered Milford's internal compliance program. Specifically, WECC determined a mitigating factor was warranted for Milford's program based on the following factors. Milford's parent company ensures that compliance activities are part of each employee's individual annual goals. Milford conducts three weekly compliance activities, including a standing weekly meeting with corporate executives. Milford updates its board of directors on a quarterly basis regarding compliance matters. Milford's compliance staff is included on emails and correspondence associated with operations events. Milford has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance issues. Furthermore, since the time of the violations addressed herein, Milford has taken steps to further improve its compliance program. Milford's parent company has dedicated additional resources to its compliance staff and its existing compliance team has greater involvement in operational activities. Milford has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

Enforcement determined there were no aggravating factors warranting a penalty higher than the proposed penalty.

MILW was cooperative throughout the process.

MILW did not fail to complete any applicable compliance directives.

There was no evidence of any attempt by MILW to conceal the violation.

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There was no evidence that MILW's violation was intentional.

WECC is not aware of any violations of this Reliability Standard by MILW affiliates or any involvement in MILW's activities such that this violation by MILW should be treated as recurring conduct.

D. NERC Reliability Standard EOP-005-1 Requirement 6

R6: *Each Transmission Operator and Balancing Authority shall train its operating personnel in the implementation of the restoration plan. Such training shall include simulated exercises, if practicable.*

STIPULATED FACTS

1. On January 20, 2012, Milford self-certified a possible violation of EOP-005-1 R6. Subsequently, WECC sent Milford a Data Request Form seeking additional information regarding Milford's self-certification. On March 1, 2012, Milford responded to WECC's Data Request and stated that, "Milford did not undertake training of its personnel in the implementation of its restoration plan because it did not have in place a restoration plan."⁴ On March 13, 2012, a WECC SME reviewed Milford's self-certification and response to WECC's Data Request Form. The WECC SME concluded that Milford was in violation of EOP-005-1 R6 because it did not train its personnel in the implementation of its restoration plan. The WECC SME then referred the matter to Enforcement.

WECC'S DETERMINATION

2. Enforcement has reviewed the WECC SME's findings, as well as Milford's self-certification and response to WECC's Data Request Form. Enforcement has determined that Milford was in violation of EOP-005-1 R6 because it did not train its personnel in the implementation of its restoration plan. Milford did not have a restoration plan and, therefore, it could not have, and did not, conduct this training. Enforcement has further determined that Milford was in violation of EOP-005-1 R6 for the period from May 18, 2010 to October 19, 2012, when MILW completed its Mitigation Plan.

MITIGATION PLAN DETAILS

3. On August 6, 2012, MILW submitted a Mitigation Plan to WECC with a proposed completion date of September 30, 2012. The Mitigation Plan required MILW to create and implement an emergency restoration plan. On September 4, 2012, WECC sent MILW notification of Mitigation Plan Acceptance. On October 2, 2012, MILW submitted a Certification of Mitigation Plan Completion. On November 14, 2012, WECC accepted

⁴ Data Request Form, EOP-005-1 R6 (March 1, 2012).

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MILW's Certification of Mitigation Plan Completion and confirmed the actual completion date of the Mitigation Plan as October 19, 2012.

RELIABILITY IMPACT STATEMENT

4. A Transmission Operator is required to train its personnel on the implementation of its restoration plan. If an entity does not train its personnel on the implementation of its restoration plan, the plan could be implemented incorrectly. Milford generates power from ninety-seven wind turbines, having a generation capacity of 306 MW. Milford's generation is connected to the BES by the Milford's 88 mile, 345 kV transmission line. The sole purpose of this line is to integrate the intermittent wind generation from the facility; the line is radial in nature and does not serve any load. Because Milford's generation is intermittent, the transmission involved is limited in use. The failure to periodically test transmission facilities needed to implement restoration could lengthen the time required to reactivate the transmission line in the event of an outage and prevent 306 MW from being delivered to the BES. However, because Milford's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to lack of restoration plan training. In other words, Milford's generation is not base-load generation. Thus, if Milford was unable to deliver its generation, its BA could simply find replacement generation elsewhere or choose not to replace such generation without adversely affecting the reliability of the bulk power system. Further, while Milford did not have a wholly-compliant restoration plan, Milford did have a restoration plan associated with its generator operations and Milford trained its generator operators on the details of the generation restoration plan. The generation restoration plan included components associated with Milford's generator tie line. Because Milford's generation is replaceable, WECC determined that this violation posed a minimal risk to the BES.

PENALTY CONSIDERATIONS

5. The Violation Risk Factor ("VRF") is High, the Violation Severity Level ("VSL") is Severe, and this violation posed minimal risk to the reliability of the BES.

The violation duration is as described above.

MITIGATING FACTORS

6. In assessing the penalty described herein, WECC considered Milford's internal compliance program. Specifically, WECC determined a mitigating factor was warranted for Milford's program based on the following factors. Milford's parent company ensures that compliance activities are part of each employee's individual annual goals. Milford conducts three weekly compliance activities, including a standing weekly meeting with corporate executives. Milford updates its board of directors on a quarterly basis regarding compliance matters. Milford's compliance staff is included on emails and correspondence associated with operations events. Milford has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance

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issues. Furthermore, since the time of the violations addressed herein, Milford has taken steps to further improve its compliance program. Milford's parent company has dedicated additional resources to its compliance staff and its existing compliance team has greater involvement in operational activities. Milford has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

Enforcement determined there were no aggravating factors warranting a penalty higher than the proposed penalty.

MILW was cooperative throughout the process.

MILW did not fail to complete any applicable compliance directives.

There was no evidence of any attempt by MILW to conceal the violation.

There was no evidence that MILW's violation was intentional.

WECC is not aware of any violations of this Reliability Standard by MILW affiliates or any involvement in MILW's activities such that this violation by MILW should be treated as recurring conduct.

E. NERC Reliability Standard EOP-005-1 Requirement 7

R7: *Each Transmission Operator and Balancing Authority shall verify the restoration procedure by actual testing or by simulation.*

STIPULATED FACTS

1. On January 20, 2012, Milford self-certified a possible violation of EOP-005-1 R7. Subsequently, WECC sent Milford a Data Request Form seeking additional information regarding Milford's self-certification. On March 1, 2012, Milford responded to WECC's Data Request and stated that, "Milford did not undertake verification of its restoration plan by actual testing or simulation because it did not have in place a restoration plan."⁵ On March 13, 2012, a WECC SME reviewed Milford's self-certification and response to WECC's Data Request Form. The WECC SME concluded that Milford was in violation of EOP-005-1 R7 because it did not verify its restoration plan by actual testing or by simulation. The WECC SME then referred the matter to Enforcement.

WECC'S DETERMINATION

2. Enforcement has reviewed the WECC SME's findings, as well as Milford's self-certification and response to WECC's Data Request Form. Enforcement has determined that Milford was in violation of EOP-005-1 R7 because it did not verify its

⁵ Data Request Form, EOP-005-1 R7 (March 1, 2012).

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restoration procedure by actual testing or by simulation. Milford did not have a restoration plan and, therefore, it could not have, and did not, conduct this verification. Enforcement has further determined that Milford was in violation of EOP-005-1 R7 for the period from May 18, 2010 to September 17, 2012, when MILW completed its Mitigation Plan.

MITIGATION PLAN DETAILS

3. On August 6, 2012, MILW submitted a Mitigation Plan to WECC with a proposed completion date of September 30, 2012. The Mitigation Plan required MILW to create and implement an emergency restoration plan. On August 24, 2012, WECC sent MILW notification of Mitigation Plan Acceptance. On October 2, 2012, MILW submitted a Certification of Mitigation Plan Completion. On October 25, 2012, WECC sent notification to MILW that it had accepted its Certification of Mitigation Plan Completion and confirmed the actual completion date of the Mitigation Plan as September 17, 2012.

RELIABILITY IMPACT STATEMENT

4. A Transmission Operator is required to verify its restoration plan procedure by actual testing or by simulation. If an entity does not verify its restoration plan, the plan could be implemented incorrectly. Milford generates power from ninety-seven wind turbines, having a generation capacity of 306 MW. Milford's generation is connected to the BES by the Milford's 88 mile, 345 kV transmission line. The sole purpose of this line is to integrate the intermittent wind generation from the facility; the line is radial in nature and does not serve any load. Because Milford's generation is intermittent, the transmission involved is limited in use. The failure to periodically test transmission facilities needed to implement restoration could lengthen the time required to reactivate the transmission line in the event of an outage and prevent 306 MW from being delivered to the BES. However, because Milford's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to lack of a restoration plan verification. In other words, Milford's generation is not base-load generation. Thus, if Milford was unable to deliver its generation, its BA could simply find replacement generation elsewhere or choose not to replace such generation without adversely affecting the reliability of the bulk power system. Because Milford's generation is replaceable, WECC determined that this violation posed a minimal risk to the BES.

PENALTY CONSIDERATIONS

5. The Violation Risk Factor ("VRF") is High, the Violation Severity Level ("VSL") is Severe, and this violation posed minimal risk to the reliability of the BES.

The violation duration is as described above.

MITIGATING FACTORS

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6. In assessing the penalty described herein, WECC considered Milford's internal compliance program. Specifically, WECC determined a mitigating factor was warranted for Milford's program based on the following factors. Milford's parent company ensures that compliance activities are part of each employee's individual annual goals. Milford conducts three weekly compliance activities, including a standing weekly meeting with corporate executives. Milford updates its board of directors on a quarterly basis regarding compliance matters. Milford's compliance staff is included on emails and correspondence associated with operations events. Milford has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance issues. Furthermore, since the time of the violations addressed herein, Milford has taken steps to further improve its compliance program. Milford's parent company has dedicated additional resources to its compliance staff and its existing compliance team has greater involvement in operational activities. Milford has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

Enforcement determined there were no aggravating factors warranting a penalty higher than the proposed penalty.

MILW was cooperative throughout the process.

MILW did not fail to complete any applicable compliance directives.

There was no evidence of any attempt by MILW to conceal the violation.

There was no evidence that MILW's violation was intentional.

WECC is not aware of any violations of this Reliability Standard by MILW affiliates or any involvement in MILW's activities such that this violation by MILW should be treated as recurring conduct.

F. NERC Reliability Standard FAC-001-0 Requirement 1

R1: *The Transmission Owner shall document, maintain, and publish facility connection requirements to ensure compliance with NERC Reliability Standards and applicable Regional Reliability Organization, subregional, Power Pool, and individual Transmission Owner planning criteria and facility connection requirements. The Transmission Owner's facility connection requirements shall address connection requirements for:*

R1.1 - Generation facilities

R1.2 - Transmission facilities

R1.3 - End-user facilities

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STIPULATED FACTS

1. On January 20, 2012, Milford self-certified potential noncompliance with FAC-001-0 R1. Subsequently, WECC sent Milford a Data Request Form seeking additional information regarding Milford's self-certification. On March 1, 2012, Milford responded to WECC's Data Request and stated that, "Milford did not have in place documented facility connection requirements."⁶ On March 13, 2012, a WECC SME reviewed Milford's self-certification and response to WECC's Data Request Form. The WECC SME concluded that Milford was in violation of FAC-001-0 R1 because it did not have in place facility connection requirements. The WECC SME then referred the matter to Enforcement.

WECC'S DETERMINATION

2. Enforcement has reviewed the WECC SME's findings, as well as Milford's self-certification and response to WECC's Data Request Form. Enforcement has determined that Milford was in violation of FAC-001-0 R1 because it did not have in place facility connection requirements. Enforcement has further determined that Milford was in violation of FAC-001-0 R1 from May 18, 2010 to March 15, 2012, when MILW completed its Mitigation Plan.

MITIGATION PLAN DETAILS

3. On August 6, 2012, MILW submitted a Mitigation Plan to WECC with a completion date of March 15, 2012. The Mitigation Plan required MILW to document its facility connection requirements for its generation, transmission and end-user facilities. On September 4, 2012, WECC sent MILW notification of Mitigation Plan Acceptance. On October 2, 2012, MILW submitted a Certification of Mitigation Plan Completion. On November 14, 2012, WECC sent notification to MILW accepting its Certification of Mitigation Plan completion and confirming the actual completion date of the Mitigation Plan as March 15, 2012.

RELIABILITY IMPACT STATEMENT

4. A Transmission Owner is required to have established facility connection requirements in place. If an entity does not have facility connection requirements the entity cannot ensure proper coordination to modifications at its facilities, as well as proper coordination when interconnecting with other entities. Milford generates power from ninety-seven wind turbines, having a generation capacity of 306 MW. Milford's generation is connected to the BES by the Milford's 88 mile, 345 kV transmission line. The sole purpose of this line is to integrate the intermittent wind generation from the facility; the line is radial in nature and does not serve any load. Because Milford's generation is intermittent, the transmission involved is limited in use. The failure to have facility connection requirements could cause an outage when Milford's facilities

⁶ Data Request Form, FAC-001-1 R1 (March 1, 2012).

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are modified or connection to new facilities. However, because Milford's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to lack of facility connection requirements. In other words, Milford's generation is not base-load generation. Thus, if Milford was unable to deliver its generation, its BA could simply find replacement generation elsewhere or choose not to replace such generation without adversely affecting the reliability of the bulk power system. Because Milford's generation is replaceable, WECC determined that this violation posed a minimal risk to the BES.

PENALTY CONSIDERATIONS

5. The Violation Risk Factor ("VRF") is Medium, the Violation Severity Level ("VSL") is Severe, and this violation posed minimal risk to the reliability of the BES.

The violation duration is as described above.

MITIGATING FACTORS

6. In assessing the penalty described herein, WECC considered Milford's internal compliance program. Specifically, WECC determined a mitigating factor was warranted for Milford's program based on the following factors. Milford's parent company ensures that compliance activities are part of each employee's individual annual goals. Milford conducts three weekly compliance activities, including a standing weekly meeting with corporate executives. Milford updates its board of directors on a quarterly basis regarding compliance matters. Milford's compliance staff is included on emails and correspondence associated with operations events. Milford has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance issues. Furthermore, since the time of the violations addressed herein, Milford has taken steps to further improve its compliance program. Milford's parent company has dedicated additional resources to its compliance staff and its existing compliance team has greater involvement in operational activities. Milford has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

Enforcement determined there were no aggravating factors warranting a penalty higher than the proposed penalty.

MILW was cooperative throughout the process.

MILW did not fail to complete any applicable compliance directives.

There was no evidence of any attempt by MILW to conceal the violation.

There was no evidence that MILW's violation was intentional.

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WECC is not aware of any violations of this Reliability Standard by MILW affiliates or any involvement in MILW's activities such that this violation by MILW should be treated as recurring conduct.

G. NERC Reliability Standard FAC-001-0 Requirement 2

R2: *The Transmission Owner's facility connection requirements shall address, but are not limited to, the following items:*

R2.1 - Provide a written summary of its plans to achieve the required system performance as described above throughout the planning horizon:

R2.1.1 - Procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems.

R2.1.2 - Procedures for notification of new or modified facilities to others (those responsible for the reliability of the interconnected transmission systems) as soon as feasible.

R2.1.3 - Voltage level and MW and MVAR capacity or demand at point of connection.

R2.1.4 - Breaker duty and surge protection.

R2.1.5 - System protection and coordination.

R2.1.6 - Metering and telecommunications.

R2.1.7 - Grounding and safety issues.

R2.1.8 - Insulation and insulation coordination.

R2.1.9 - Voltage, Reactive Power, and power factor control.

R2.1.10 - Power quality impacts.

R2.1.11 - Equipment Ratings.

R2.1.12 - Synchronizing of facilities.

R2.1.13 - Maintenance coordination.

R2.1.14 - Operational issues (abnormal frequency and voltages).

R2.1.15 - Inspection requirements for existing or new facilities.

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R2.1.16 - Communications and procedures during normal and emergency operating conditions.

STIPULATED FACTS

1. On January 20, 2012, Milford self-certified potential noncompliance with FAC-001-1 R2. Subsequently, WECC sent Milford a Data Request Form seeking additional information regarding Milford's self-certification. On March 1, 2012, Milford responded to WECC's Data Request and stated that, "Milford did not have in place documented facility connection requirements that address the system performance as requirements listed in R2."⁷ On March 13, 2012, a WECC SME reviewed Milford's self-certification and response to WECC's Data Request Form. The WECC SME concluded that Milford was in violation of FAC-001-1 R2 because it did not have facility connection requirements that provide a written summary of its plans to avoid adverse system performance throughout the planning horizon and address the items in sub-requirements R2.1.1 through R2.1.16 at a minimum. The WECC SME then referred the matter to Enforcement.

WECC'S DETERMINATION

2. Enforcement has reviewed the WECC SME's findings, as well as Milford's self-certification and response to WECC's Data Request Form. Enforcement has determined that Milford is in violation of FAC-001-1 R2 because it did not have facility connection requirements that provide a written summary of its plans to avoid adverse system performance throughout the planning horizon and address the items in sub-requirements R2.1.1 through R2.1.16 at a minimum. Milford did not document interconnection requirements under R1 and, therefore, it could not have, and did not ensure that these requirements addressed the performance criteria specified in R2. Enforcement has further determined that Milford was in violation of FAC-001-1 R2 for the period from May 18, 2010 to March 15, 2012, when MILW completed its Mitigation Plan.

MITIGATION PLAN DETAILS

3. On August 6, 2012, MILW submitted a Mitigation Plan to WECC with a completion date of March 15, 2012. The Mitigation Plan required MILW to document its facility connection requirements for its generation, transmission and end-user facilities. On September 4, 2012, WECC sent MILW notification of Mitigation Plan Acceptance. On October 2, 2012, MILW submitted a Certification of Mitigation Plan Completion. On October 25, 2012, WECC sent notification to MILW accepting its Certification of Mitigation Plan completion and confirming the actual completion date of the Mitigation Plan as March 15, 2012.

⁷ Data Request Form, FAC-001-1 R2 (March 1, 2012).

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RELIABILITY IMPACT STATEMENT

4. A Transmission Owner is required to have established facility connection requirements in place. If an entity does not have facility connection requirements the entity cannot ensure proper coordination to modifications at its facilities, as well as proper coordination when interconnecting with other entities. Milford generates power from ninety-seven wind turbines, having a generation capacity of 306 MW. Milford's generation is connected to the BES by the Milford's 88 mile, 345 kV transmission line. The sole purpose of this line is to integrate the intermittent wind generation from the facility; the line is radial in nature and does not serve any load. Because Milford's generation is intermittent, the transmission involved is limited in use. The failure to have facility connection requirements could cause an outage when Milford's facilities are modified or connection to new facilities. However, because Milford's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to lack of facility connection requirements. In other words, Milford's generation is not base-load generation. Thus, if Milford was unable to deliver its generation, its BA could simply find replacement generation elsewhere or choose not to replace such generation without adversely affecting the reliability of the bulk power system. Because Milford's generation is replaceable, WECC determined that this violation posed a minimal risk to the BES.

PENALTY CONSIDERATIONS

5. The Violation Risk Factor ("VRF") is Medium, the Violation Severity Level ("VSL") is Severe, and this violation posed minimal risk to the reliability of the BES.

The violation duration is as described above.

MITIGATING FACTORS

6. In assessing the penalty described herein, WECC considered Milford's internal compliance program. Specifically, WECC determined a mitigating factor was warranted for Milford's program based on the following factors. Milford's parent company ensures that compliance activities are part of each employee's individual annual goals. Milford conducts three weekly compliance activities, including a standing weekly meeting with corporate executives. Milford updates its board of directors on a quarterly basis regarding compliance matters. Milford's compliance staff is included on emails and correspondence associated with operations events. Milford has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance issues. Furthermore, since the time of the violations addressed herein, Milford has taken steps to further improve its compliance program. Milford's parent company has dedicated additional resources to its compliance staff and its existing compliance team has greater involvement in operational activities. Milford has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

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Enforcement determined there were no aggravating factors warranting a penalty higher than the proposed penalty.

MILW was cooperative throughout the process.

MILW did not fail to complete any applicable compliance directives.

There was no evidence of any attempt by MILW to conceal the violation.

There was no evidence that MILW's violation was intentional.

WECC is not aware of any violations of this Reliability Standard by MILW affiliates or any involvement in MILW's activities such that this violation by MILW should be treated as recurring conduct.

H. NERC Reliability Standard FAC-003-1 Requirement 1

R1: *The Transmission Owner shall prepare, and keep current, a formal transmission vegetation management program (TVMP). The TVMP shall include the Transmission Owner's objectives, practices, approved procedures, and work specifications (ANSI A300, Tree Care Operations - Tree, Shrub, and Other Woody Plant Maintenance - Standard Practices, while not a requirement of this standard, is considered to be an industry best practice.).*

R1.1 - The TVMP shall define a schedule for and the type (aerial, ground) of ROW vegetation inspections. This schedule should be flexible enough to adjust for changing conditions. The inspection schedule shall be based on the anticipated growth of vegetation and any other environmental or operational factors that could impact the relationship of vegetation to the Transmission Owner's transmission lines.

R1.2 - The Transmission Owner, in the TVMP, shall identify and document clearances between vegetation and any overhead, ungrounded supply conductors, taking into consideration transmission line voltage, the effects of ambient temperature on conductor sag under maximum design loading, and the effects of wind velocities on conductor sway. Specifically, the Transmission Owner shall establish clearances to be achieved at the time of vegetation management work identified herein as Clearance 1, and shall also establish and maintain a set of clearances identified herein as Clearance 2 to prevent flashover between vegetation and overhead ungrounded supply conductors.

R1.2.1 - Clearance 1 - The Transmission Owner shall determine and document appropriate clearance distances to be achieved at the time of transmission vegetation management work based upon local conditions and the expected time frame in which the

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Transmission Owner plans to return for future vegetation management work. Local conditions may include, but are not limited to: operating voltage, appropriate vegetation management techniques, fire risk, reasonably anticipated tree and conductor movement, species types and growth rates, species failure characteristics, local climate and rainfall patterns, line terrain and elevation, location of the vegetation within the span, and worker approach distance requirements. Clearance 1 distances shall be greater than those defined by Clearance 2 below.

R1.2.2 - Clearance 2 - The Transmission Owner shall determine and document specific radial clearances to be maintained between vegetation and conductors under all rated electrical operating conditions. These minimum clearance distances are necessary to prevent flashover between vegetation and conductors and will vary due to such factors as altitude and operating voltage. These Transmission Owner-specific minimum clearance distances shall be no less than those set forth in the Institute of Electrical and Electronics Engineers (IEEE) Standard 516-2003 (Guide for Maintenance Methods on Energized Power Lines) and as specified in its Section 4.2.2.3, Minimum Air Insulation Distances without Tools in the Air Gap.

R1.2.2.1 - Where transmission system transient overvoltage factors are not known, clearances shall be derived from Table 5, IEEE 516-2003, phase-to-ground distances, with appropriate altitude correction factors applied.

R1.2.2.2 - Where transmission system transient overvoltage factors are known, clearances shall be derived from Table 7, IEEE 516-2003, phase-to-phase voltages, with appropriate altitude correction factors applied

R1.3 - All personnel directly involved in the design and implementation of the TVMP shall hold appropriate qualifications and training, as defined by the Transmission Owner, to perform their duties.

R1.4 - Each Transmission Owner shall develop mitigation measures to achieve sufficient clearances for the protection of the transmission facilities when it identifies locations on the ROW where the Transmission Owner is restricted from attaining the clearances specified in Requirement 1.2.1.

R1.5 - Each Transmission Owner shall establish and document a process for the immediate communication of vegetation conditions that present an imminent threat of a transmission line outage. This is so that action

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(temporary reduction in line rating, switching line out of service, etc.) may be taken until the threat is relieved.

STIPULATED FACTS

1. On January 20, 2012, Milford self-certified potential noncompliance with FAC-003-1 R1. Subsequently, WECC sent Milford a Data Request Form seeking additional information regarding Milford's self-certification. On March 1, 2012, Milford responded to WECC's Data Request and stated that, "Milford did not prepare and keep current a formal transmission vegetation management program (TVMP)."⁸ On March 13, 2012, a WECC SME reviewed Milford's self-certification and response to WECC's Data Request Form. The WECC SME concluded that Milford was in violation of FAC-003-1 R1 because it did not prepare and keep current a TVMP. The WECC SME then referred the matter to Enforcement.

WECC'S DETERMINATION

2. Enforcement has reviewed the WECC SME's findings, as well as Milford's self-certification and response to WECC's Data Request Form. Enforcement has determined that Milford was in violation of FAC-003-1 R1 because it did not prepare and keep current a TVMP. Enforcement has further determined that Milford was in violation of FAC-003-1 R1 for the period from May 18, 2010 to April 25, 2012, when MILW completed its Mitigation Plan.

MITIGATION PLAN DETAILS

3. On August 6, 2012, MILW submitted a Mitigation Plan to WECC with a completion date of April 25, 2012. The Mitigation Plan required MILW to adopt and implement a formal transmission vegetation management program, complete 2012 required vegetation management inspection in accordance with the adopted vegetation management program and complete a vegetation management training program. On September 4, 2012, WECC sent MILW notification of Mitigation Plan Acceptance. On October 2, 2012, MILW submitted a Certification of Mitigation Plan Completion. On October 25, 2012, WECC sent notification to MILW accepting its Certification of Mitigation Plan completion and confirming the actual Mitigation Plan completion date as April 25, 2012.

RELIABILITY IMPACT STATEMENT

4. A Transmission Owner is required to have a keep current a TVMP. If an entity does not have and keep current a TVMP, vegetation could be allowed to come into contact with the entity's transmission line and cause an outage. Milford generates power from ninety-seven wind turbines, having a generation capacity of 306 MW. Milford's generation is connected to the BES by the Milford's 88 mile, 345 kV

⁸ Data Request Form, FAC-003-1 R1 (March 1, 2012).

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transmission line. The sole purpose of this line is to integrate the intermittent wind generation from the facility; the line is radial in nature and does not serve any load. Because Milford's generation is intermittent, the transmission involved is limited in use. The failure to have and keep current a TVMP could cause an outage of Milford's transmission line and prevent its generation from being transmitted into the grid. However, because Milford's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to the lack of a TVMP. In other words, Milford's generation is not base-load generation. Thus, if Milford was unable to deliver its generation, its BA could simply find replacement generation elsewhere or choose not to replace such generation without adversely affecting the reliability of the bulk power system. In addition, Milford's system is wholly contained in a desert environment where vegetation growth does not reach the height of its transmission lines. Because Milford's generation is replaceable and Milford's system is wholly contained in a desert environment, WECC determined that this violation posed a minimal risk to the BES.

PENALTY CONSIDERATIONS

5. The Violation Risk Factor ("VRF") is High, the Violation Severity Level ("VSL") is Severe, and this violation posed minimal risk to the reliability of the BES.

The violation duration is as described above.

MITIGATING FACTORS

6. In assessing the penalty described herein, WECC considered Milford's internal compliance program. Specifically, WECC determined a mitigating factor was warranted for Milford's program based on the following factors. Milford's parent company ensures that compliance activities are part of each employee's individual annual goals. Milford conducts three weekly compliance activities, including a standing weekly meeting with corporate executives. Milford updates its board of directors on a quarterly basis regarding compliance matters. Milford's compliance staff is included on emails and correspondence associated with operations events. Milford has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance issues. Furthermore, since the time of the violations addressed herein, Milford has taken steps to further improve its compliance program. Milford's parent company has dedicated additional resources to its compliance staff and its existing compliance team has greater involvement in operational activities. Milford has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

Enforcement determined there were no aggravating factors warranting a penalty higher than the proposed penalty.

MILW was cooperative throughout the process.

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MILW did not fail to complete any applicable compliance directives.

There was no evidence of any attempt by MILW to conceal the violation.

There was no evidence that MILW's violation was intentional.

WECC is not aware of any violations of this Reliability Standard by MILW affiliates or any involvement in MILW's activities such that this violation by MILW should be treated as recurring conduct.

I. NERC Reliability Standard FAC-003-1 Requirement 2

R2: *The Transmission Owner shall create and implement an annual plan for vegetation management work to ensure the reliability of the system. The plan shall describe the methods used, such as manual clearing, mechanical clearing, herbicide treatment, or other actions. The plan should be flexible enough to adjust to changing conditions, taking into consideration anticipated growth of vegetation and all other environmental factors that may have an impact on the reliability of the transmission systems. Adjustments to the plan shall be documented as they occur. The plan should take into consideration the time required to obtain permissions or permits from landowners or regulatory authorities. Each Transmission Owner shall have systems and procedures for documenting and tracking the planned vegetation management work and ensuring that the vegetation management work was completed according to work specifications.*

STIPULATED FACTS

1. On January 20, 2012, Milford self-certified potential noncompliance with FAC-003-1 R2. Subsequently, WECC sent Milford a Data Request Form seeking additional information regarding Milford's self-certification. On March 1, 2012, Milford responded to WECC's Data Request and stated that, "Milford did not create or implement an annual plan for vegetation management work to ensure the reliability of the system."⁹ On March 13, 2012, a WECC SME reviewed Milford's self-certification and response to WECC's Data Request Form. The WECC SME concluded that Milford was in violation of FAC-003-1 R2 because it did not implement an annual plan for vegetation management. The WECC SME then referred the matter to Enforcement.

WECC'S DETERMINATION

2. Enforcement has reviewed the WECC SME's findings, as well as Milford's self-certification and response to WECC's Data Request Form. Enforcement has determined that Milford was in violation of FAC-003-1 R2 because it did not implement an annual plan for vegetation management. Milford did not have a TVMP under R1

⁹ Data Request Form, FAC-003-1 R2 (March 1, 2012).

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and, therefore, it could not have, and did not, developed annual vegetation management plans for the TVMP as required under R2. Enforcement has further determined that Milford was in violation of FAC-003-1 R2 for the period from May 18, 2010 to April 25, 2012, when MILW completed its Mitigation Plan.

MITIGATION PLAN DETAILS

3. On August 6, 2012, MILW submitted a Mitigation Plan to WECC with a completion date of April 25, 2012. The Mitigation Plan required MILW to adopt and implement a formal transmission vegetation management program, complete 2012 required vegetation management inspection in accordance with the adopted vegetation management program and complete a vegetation management training program. On September 4, 2012, WECC sent MILW notification of Mitigation Plan Acceptance. On October 2, 2012, MILW submitted a Certification of Mitigation Plan Completion. On October 25, 2012, WECC sent notification to MILW accepting its Certification of Mitigation Plan completion and confirming the actual Mitigation Plan completion date as April 25, 2012.

RELIABILITY IMPACT STATEMENT

4. A Transmission Owner is required to implement an annual plan for vegetation management. If an entity does not implement an annual plan for vegetation management, vegetation could be allowed to come into contact with the entity's transmission line and cause an outage. Milford generates power from ninety-seven wind turbines, having a generation capacity of 306 MW. Milford's generation is connected to the BES by the Milford's 88 mile, 345 kV transmission line. The sole purpose of this line is to integrate the intermittent wind generation from the facility; the line is radial in nature and does not serve any load. Because Milford's generation is intermittent, the transmission involved is limited in use. The failure to implement an annual plan for vegetation management could cause an outage of Milford's transmission line and prevent its generation from being transmitted into the grid. However, because Milford's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to the lack of an annual plan for vegetation management. In other words, Milford's generation is not base-load generation. Thus, if Milford was unable to deliver its generation, its BA could simply find replacement generation elsewhere or choose not to replace such generation without adversely affecting the reliability of the bulk power system. In addition, Milford's system is wholly contained in a desert environment where vegetation growth does not reach the height of its transmission lines. Because Milford's generation is replaceable and Milford's system is wholly contained in a desert environment, WECC determined that this violation posed a minimal risk to the BES.

PENALTY CONSIDERATIONS

5. The Violation Risk Factor ("VRF") is High, the Violation Severity Level ("VSL") is Severe, and this violation posed minimal risk to the reliability of the BES.

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The violation duration is as described above.

MITIGATING FACTORS

6. In assessing the penalty described herein, WECC considered Milford's internal compliance program. Specifically, WECC determined a mitigating factor was warranted for Milford's program based on the following factors. Milford's parent company ensures that compliance activities are part of each employee's individual annual goals. Milford conducts three weekly compliance activities, including a standing weekly meeting with corporate executives. Milford updates its board of directors on a quarterly basis regarding compliance matters. Milford's compliance staff is included on emails and correspondence associated with operations events. Milford has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance issues. Furthermore, since the time of the violations addressed herein, Milford has taken steps to further improve its compliance program. Milford's parent company has dedicated additional resources to its compliance staff and its existing compliance team has greater involvement in operational activities. Milford has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

Enforcement determined there were no aggravating factors warranting a penalty higher than the proposed penalty.

MILW was cooperative throughout the process.

MILW did not fail to complete any applicable compliance directives.

There was no evidence of any attempt by MILW to conceal the violation.
There was no evidence that MILW's violation was intentional.

WECC is not aware of any violations of this Reliability Standard by MILW affiliates or any involvement in MILW's activities such that this violation by MILW should be treated as recurring conduct.

J. NERC Reliability Standard PER-002-0 Requirement 2

R2: *Each Transmission Operator and Balancing Authority shall have a training program for all operating personnel that are in:*

R2.1 - Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.

R2.2 - Positions directly responsible for complying with NERC standards.

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STIPULATED FACTS

1. On January 20, 2012, Milford self-certified potential noncompliance with PER-002-0 R2. Subsequently, WECC sent Milford a Data Request Form seeking additional information regarding Milford's self-certification. On March 1, 2012, Milford responded to WECC's Data Request and stated that, "Milford did not have in place a training program for all operating personnel covered by PER-002-0 R2.1 and R2.2."¹⁰ On March 13, 2012, a WECC SME reviewed Milford's self-certification and response to WECC's Data Request Form. The WECC SME concluded that Milford was in violation of PER-002-0 R2 because it did not have a training program for all operating personnel as required by the Standard. The WECC SME then referred the matter to Enforcement.

WECC'S DETERMINATION

2. Enforcement has reviewed the WECC SME's findings, as well as Milford's self-certification and response to WECC's Data Request Form. Enforcement has determined that Milford was in violation of PER-002-0 R2 because it did not have a training program for all operating personnel as required by the Standard. Enforcement has further determined that Milford was in violation of PER-002-0 R2 for the period from May 18, 2010 to September 19, 2012, when MILW completed its Mitigation Plan.

MITIGATION PLAN DETAILS

3. On August 6, 2012, MILW submitted a Mitigation Plan to WECC with a proposed completion date of September 30, 2012. The Mitigation Plan required MILW to create and implement a formal operator training program. On September 4, 2012, WECC sent MILW notification of Mitigation Plan Acceptance. On October 3, 2012, MILW submitted a Certification of Mitigation Plan Completion. On October 25, 2012, WECC sent notification to MILW accepting its Certification of Mitigation Plan completion and confirmed the actual completion date of the Mitigation Plan as September 19, 2012.

RELIABILITY IMPACT STATEMENT

4. A Transmission Operator is required have a training program for all operating personnel that are in positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System, as well as positions directly responsible for complying with NERC standards. If an entity does not have a training program as required by the Standard, its operating personnel might not have the training to operate the grid in a reliable manner. Milford generates power from ninety-seven wind turbines, having a generation capacity of 306 MW. Milford's generation is connected to the BES by the Milford's 88 mile, 345 kV transmission line. The sole purpose of this line is to integrate the intermittent wind generation from the facility; the line is radial in nature and does not serve any load.

¹⁰ Data Request Form, PER-002-0 R2 (March 1, 2012).

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Because Milford's generation is intermittent, the transmission involved is limited in use. The failure to have a training program for its operating personnel could result in the grid being operated in an unreliable manner. However, because Milford's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to the lack of a training program. In other words, Milford's generation is not base-load generation. Thus, if Milford was unable to deliver its generation, its BA could simply find replacement generation elsewhere or choose not to replace such generation without adversely affecting the reliability of the bulk power system. Because Milford's generation is replaceable, WECC determined that this violation posed a minimal risk to the BES.

PENALTY CONSIDERATIONS

5. The Violation Risk Factor ("VRF") is High, the Violation Severity Level ("VSL") is Severe, and this violation posed minimal risk to the reliability of the BES.

The violation duration is as described above.

MITIGATING FACTORS

6. In assessing the penalty described herein, WECC considered Milford's internal compliance program. Specifically, WECC determined a mitigating factor was warranted for Milford's program based on the following factors. Milford's parent company ensures that compliance activities are part of each employee's individual annual goals. Milford conducts three weekly compliance activities, including a standing weekly meeting with corporate executives. Milford updates its board of directors on a quarterly basis regarding compliance matters. Milford's compliance staff is included on emails and correspondence associated with operations events. Milford has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance issues. Furthermore, since the time of the violations addressed herein, Milford has taken steps to further improve its compliance program. Milford's parent company has dedicated additional resources to its compliance staff and its existing compliance team has greater involvement in operational activities. Milford has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

Enforcement determined there were no aggravating factors warranting a penalty higher than the proposed penalty.

MILW was cooperative throughout the process.

MILW did not fail to complete any applicable compliance directives.

There was no evidence of any attempt by MILW to conceal the violation.

There was no evidence that MILW's violation was intentional.

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WECC is not aware of any violations of this Reliability Standard by MILW affiliates or any involvement in MILW's activities such that this violation by MILW should be treated as recurring conduct.

K. NERC Reliability Standard PER-002-0 Requirement 3

R3: *For personnel identified in Requirement R2, the Transmission Operator and Balancing Authority shall provide a training program meeting the following criteria*

R3.1 - A set of training program objectives must be defined, based on NERC and Regional Reliability Organization standards, entity operating procedures, and applicable regulatory requirements. These objectives shall reference the knowledge and competencies needed to apply those standards, procedures, and requirements to normal, emergency, and restoration conditions for the Transmission Operator and Balancing Authority operating positions

R3.2 - The training program must include a plan for the initial and continuing training of Transmission Operator and Balancing Authority operating personnel. That plan shall address knowledge and competencies required for reliable system operations.

R3.3 - The training program must include training time for all Transmission Operator and Balancing Authority operating personnel to ensure their operating proficiency

R3.4 - Training staff must be identified, and the staff must be competent in both knowledge of system operations and instructional capabilities.

STIPULATED FACTS

1. On January 20, 2012, Milford self-certified potential noncompliance with PER-002-0 R3. Subsequently, WECC sent Milford a Data Request Form seeking additional information regarding Milford's self-certification. On March 1, 2012, Milford responded to WECC's Data Request and stated that, "Milford did not provide to operating personnel covered by the standard a training program that satisfied the criteria set forth in PER-00-0 R3.1, R3.2, R3.3."¹¹ On March 13, 2012, a WECC SME reviewed Milford's self-certification and response to WECC's Data Request Form. The WECC SME concluded that Milford was in violation of PER-002-0 R3 because it did not have a training program for all operating personnel as required by the Standard. The WECC SME then referred the matter to Enforcement.

¹¹ Data Request Form, PER-002-0 R3 (March 1, 2012).

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WECC'S DETERMINATION

2. Enforcement has reviewed the WECC SME's findings, as well as Milford's self-certification and response to WECC's Data Request Form. Enforcement has determined that Milford was in violation of PER-002-0 R3 because it did not have a training program for all operating personnel that met the criteria specified in R3. Milford did not have a training program for all operating personnel under R2 and, therefore, it could not have, and did not ensure that its training program met the requirements of R3. Enforcement has further determined that Milford was in violation of PER-002-0 R3 for the period from May 18, 2010 to September 19, 2012, when MILW completed its Mitigation Plan.

MITIGATION PLAN DETAILS

3. On August 6, 2012, MILW submitted a Mitigation Plan to WECC with a proposed completion date of September 30, 2012. The Mitigation Plan required MILW to create and implement a formal operator training program. On September 4, 2012, WECC sent MILW notification of Mitigation Plan Acceptance. On October 3, 2012, MILW submitted a Certification of Mitigation Plan Completion. On October 25, 2012, WECC sent notification to MILW accepting its Certification of Mitigation Plan completion and confirmed the actual completion date of the Mitigation Plan as September 19, 2012.

RELIABILITY IMPACT STATEMENT

4. A Transmission Operator is required have a training program for all operating personnel that meets the criteria of the Standard. If an entity does not have a training program as required by the Standard, its operating personnel might not have the training to operate the grid in a reliable manner. Milford generates power from ninety-seven wind turbines, having a generation capacity of 306 MW. Milford's generation is connected to the BES by the Milford's 88 mile, 345 kV transmission line. The sole purpose of this line is to integrate the intermittent wind generation from the facility; the line is radial in nature and does not serve any load. Because Milford's generation is intermittent, the transmission involved is limited in use. The failure to have a training program for its operating personnel could result in the grid being operated in an unreliable manner. However, because Milford's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to the lack of a training program. In other words, Milford's generation is not base-load generation. Thus, if Milford was unable to deliver its generation, its BA could simply find replacement generation elsewhere or choose not to replace such generation without adversely affecting the reliability of the bulk power system. Because Milford's generation is replaceable, WECC determined that this violation posed a minimal risk to the BES.

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PENALTY CONSIDERATIONS

5. The Violation Risk Factor ("VRF") is High, the Violation Severity Level ("VSL") is Severe, and this violation posed minimal risk to the reliability of the BES.

The violation duration is as described above.

MITIGATING FACTORS

6. In assessing the penalty described herein, WECC considered Milford's internal compliance program. Specifically, WECC determined a mitigating factor was warranted for Milford's program based on the following factors. Milford's parent company ensures that compliance activities are part of each employee's individual annual goals. Milford conducts three weekly compliance activities, including a standing weekly meeting with corporate executives. Milford updates its board of directors on a quarterly basis regarding compliance matters. Milford's compliance staff is included on emails and correspondence associated with operations events. Milford has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance issues. Furthermore, since the time of the violations addressed herein, Milford has taken steps to further improve its compliance program. Milford's parent company has dedicated additional resources to its compliance staff and its existing compliance team has greater involvement in operational activities. Milford has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

Enforcement determined there were no aggravating factors warranting a penalty higher than the proposed penalty.

MILW was cooperative throughout the process.

MILW did not fail to complete any applicable compliance directives.

There was no evidence of any attempt by MILW to conceal the violation.

There was no evidence that MILW's violation was intentional.

WECC is not aware of any violations of this Reliability Standard by MILW affiliates or any involvement in MILW's activities such that this violation by MILW should be treated as recurring conduct.

L. NERC Reliability Standard PER-002-0 Requirement 4

R4: *For personnel identified in Requirement R2, each Transmission Operator and Balancing Authority shall provide its operating personnel at least five days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.*

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STIPULATED FACTS

1. On January 20, 2012, Milford self-certified potential noncompliance with PER-002-0 R4. Subsequently, WECC sent Milford a Data Request Form seeking additional information regarding Milford's self-certification. On March 1, 2012, Milford responded to WECC's Data Request and stated that, "Milford did not provide to the operating personnel covered by this standard a program of training and drills using realistic simulations of system emergencies."¹² On March 13, 2012, a WECC SME reviewed Milford's self-certification and response to WECC's Data Request Form. The WECC SME concluded that Milford was in violation of PER-002-0 R4 because it did not have a training program for all operating personnel as required by the Standard. The WECC SME then referred the matter to Enforcement.

WECC'S DETERMINATION

2. Enforcement has reviewed the WECC SME's findings, as well as Milford's self-certification and response to WECC's Data Request Form. Enforcement has determined that Milford was in violation of PER-002-0 R4 because it did not provide all operating personnel the requisite number of days of training and drills using realistic simulations. Milford did not have a training program for all operating personnel under R2 and, therefore, it could not have, and did not provide its operating personnel the number of training days or drills required under R3. In addition, Enforcement has further determined that Milford was in violation of PER-002-0 R4 for the period from May 18, 2010 to September 19, 2012, when MILW completed its Mitigation Plan.

MITIGATION PLAN DETAILS

3. On August 6, 2012, MILW submitted a Mitigation Plan to WECC with a proposed completion date of September 30, 2012. The Mitigation Plan required MILW to create and implement a formal operator training program. On September 4, 2012, WECC sent MILW notification of Mitigation Plan Acceptance. On October 3, 2012, MILW submitted a Certification of Mitigation Plan Completion. On October 25, 2012, WECC sent notification to MILW accepting its Certification of Mitigation Plan completion and confirmed the actual completion date of the Mitigation Plan as September 19, 2012.

RELIABILITY IMPACT STATEMENT

4. A Transmission Operator is required have a training program for all operating personnel that meets the criteria of the Standard. If an entity does not have a training program as required by the Standard, its operating personnel might not have the training to operate the grid in a reliable manner. Milford generates power from ninety-seven wind turbines, having a generation capacity of 306 MW. Milford's generation is connected to the BES by the Milford's 88 mile, 345 kV transmission line. The sole

¹² Data Request Form, PER-002-0 R4 (March 1, 2012).

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purpose of this line is to integrate the intermittent wind generation from the facility; the line is radial in nature and does not serve any load. Because Milford's generation is intermittent, the transmission involved is limited in use. The failure to have a training program for its operating personnel could result in the grid being operated in an unreliable manner. However, because Milford's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to the lack of a training program. In other words, Milford's generation is not base-load generation. Thus, if Milford was unable to deliver its generation, its BA could simply find replacement generation elsewhere or choose not to replace such generation without adversely affecting the reliability of the bulk power system. Because Milford's generation is replaceable, WECC determined that this violation posed a minimal risk to the BES.

PENALTY CONSIDERATIONS

5. The Violation Risk Factor ("VRF") is High, the Violation Severity Level ("VSL") is Severe, and this violation posed minimal risk to the reliability of the BES.

The violation duration is as described above.

MITIGATING FACTORS

6. In assessing the penalty described herein, WECC considered Milford's internal compliance program. Specifically, WECC determined a mitigating factor was warranted for Milford's program based on the following factors. Milford's parent company ensures that compliance activities are part of each employee's individual annual goals. Milford conducts three weekly compliance activities, including a standing weekly meeting with corporate executives. Milford updates its board of directors on a quarterly basis regarding compliance matters. Milford's compliance staff is included on emails and correspondence associated with operations events. Milford has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance issues. Furthermore, since the time of the violations addressed herein, Milford has taken steps to further improve its compliance program. Milford's parent company has dedicated additional resources to its compliance staff and its existing compliance team has greater involvement in operational activities. Milford has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

Enforcement determined there were no aggravating factors warranting a penalty higher than the proposed penalty.

MILW was cooperative throughout the process.

MILW did not fail to complete any applicable compliance directives.

There was no evidence of any attempt by MILW to conceal the violation.

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There was no evidence that MILW's violation was intentional.

WECC is not aware of any violations of this Reliability Standard by MILW affiliates or any involvement in MILW's activities such that this violation by MILW should be treated as recurring conduct.

M. NERC Reliability Standard PER-003-0 Requirement 1

R1: *Each Transmission Operator, Balancing Authority, and Reliability Coordinator shall staff all operating positions that meet both of the following criteria with personnel that are NERC-certified for the applicable functions:*

R1.1 - Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.

R1.2 - Positions directly responsible for complying with NERC standards.

STIPULATED FACTS

1. On January 20, 2012, Milford self-certified potential noncompliance with PER-003-0 R1. Subsequently, WECC sent Milford a Data Request Form seeking additional information regarding Milford's self-certification. On March 1, 2012, Milford responded to WECC's Data Request and stated that, "Milford did not have personnel fully certified by NERC in the operations covered by this Standard."¹³ On March 13, 2012, a WECC SME reviewed Milford's self-certification and response to WECC's Data Request Form. The WECC SME concluded that Milford was in violation of PER-003-0 R1 because its operating positions did not have the certifications as required by the Standard. The WECC SME then referred the matter to Enforcement.

WECC'S DETERMINATION

2. Enforcement has reviewed the WECC SME's findings, as well as Milford's self-certification and response to WECC's Data Request Form. Enforcement has determined that Milford was in violation of PER-003-0 R1 because its operating positions did not have the certifications as required by the Standard. Enforcement has further determined that Milford was in violation of PER-003-0 R1 for the period from May 18, 2010 to September 19, 2012, when MILW completed its Mitigation Plan.

MITIGATION PLAN DETAILS

3. On August 6, 2012, MILW submitted a Mitigation Plan to WECC with a proposed completion date of September 30, 2012. The Mitigation Plan required MILW to provide

¹³ Data Request Form, PER-003-0 R1 (March 1, 2012).

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a training program that includes the requirement for NERC certification and continuing education hours to maintain the NERC certification and MILW will have at least one NERC certified operator managing its transmission operations per shift. On September 4, 2012, WECC sent MILW notification of Mitigation Plan Acceptance. On October 3, 2012, MILW submitted a Certification of Mitigation Plan Completion. On October 25, 2012, WECC sent notification to MILW accepting its Certification of Mitigation Plan completion and confirmed the actual completion date of the Mitigation Plan as September 19, 2012.

RELIABILITY IMPACT STATEMENT

4. A Transmission Operator is required to staff its operating personnel with the certifications as required by the Standard. If an entity does not staff its operating positions with personnel that are NERC certified, its operating personnel might not have the training to operate the grid in a reliable manner. Milford generates power from ninety-seven wind turbines, having a generation capacity of 306 MW. Milford's generation is connected to the BES by the Milford's 88 mile, 345 kV transmission line. The sole purpose of this line is to integrate the intermittent wind generation from the facility; the line is radial in nature and does not serve any load. Because Milford's generation is intermittent, the transmission involved is limited in use. The failure to have operating staff with the proper certifications could result in the grid being operated in an unreliable manner. However, because Milford's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to the lack properly staffed operating personnel. Thus, if Milford was unable to deliver its generation, its BA could simply find replacement generation elsewhere or choose not to replace such generation without adversely affecting the reliability of the bulk power system. In other words, Milford's generation is not base-load generation. Because Milford's generation is replaceable, WECC determined that this violation posed a minimal risk to the BES.

PENALTY CONSIDERATIONS

5. The Violation Risk Factor ("VRF") is High, the Violation Severity Level ("VSL") is Severe, and this violation posed minimal risk to the reliability of the BES.

The violation duration is as described above.

MITIGATING FACTORS

6. In assessing the penalty described herein, WECC considered Milford's internal compliance program. Specifically, WECC determined a mitigating factor was warranted for Milford's program based on the following factors. Milford's parent company ensures that compliance activities are part of each employee's individual annual goals. Milford conducts three weekly compliance activities, including a standing weekly meeting with corporate executives. Milford updates its board of directors on a quarterly basis regarding compliance matters. Milford's compliance staff is included on emails and

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correspondence associated with operations events. Milford has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance issues. Furthermore, since the time of the violations addressed herein, Milford has taken steps to further improve its compliance program. Milford's parent company has dedicated additional resources to its compliance staff and its existing compliance team has greater involvement in operational activities. Milford has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

Enforcement determined there were no aggravating factors warranting a penalty higher than the proposed penalty.

MILW was cooperative throughout the process.

MILW did not fail to complete any applicable compliance directives.

There was no evidence of any attempt by MILW to conceal the violation.

There was no evidence that MILW's violation was intentional.

WECC is not aware of any violations of this Reliability Standard by MILW affiliates or any involvement in MILW's activities such that this violation by MILW should be treated as recurring conduct.

N. NERC Reliability Standard TOP-001-1 Requirement 1

R1: *Each Transmission Operator shall have the responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its area and shall exercise specific authority to alleviate operating emergencies.*

STIPULATED FACTS

1. On January 20, 2012, Milford self-certified potential noncompliance with TOP-001-1 R1. Subsequently, WECC sent Milford a Data Request Form seeking additional information regarding Milford's self-certification. On March 1, 2012, Milford responded to WECC's Data Request and stated that, "not all transmission operators at Milford had clear decision-making authority to take whatever actions were needed to ensure the reliability of Milford's area."¹⁴ On March 13, 2012, a WECC SME reviewed Milford's self-certification and response to WECC's Data Request Form. The WECC SME concluded that Milford was in violation of TOP-001-1 R1 because its transmission operators did not have clear decision-making authority to take whatever actions are needed to ensure the reliability of its area. The WECC SME then referred the matter to Enforcement.

¹⁴ Data Request Form, TOP-001-1 R1 (March 1, 2012),

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WECC'S DETERMINATION

2. Enforcement has reviewed the WECC SME's findings, as well as Milford's self-certification and response to WECC's Data Request Form. Enforcement has determined that Milford is in violation of TOP-001-1 R1 because its transmission operators did not have clear decision-making authority to take whatever actions are needed to ensure the reliability of its area. Enforcement has further determined that Milford was in violation of TOP-001-1 R1 for the period from May 18, 2010 to September 14, 2012, when MILW completed its Mitigation Plan.

MITIGATION PLAN DETAILS

3. On August 6, 2012, MILW submitted Mitigation Plan to WECC with a proposed completion date of September 30, 2012. The Mitigation Plan required MILW to adopt a letter of authority and subsequently post the letter of authority in its control room. On August 24, 2012, WECC sent MILW notification of Mitigation Plan Acceptance. On October 3, 2012, MILW submitted a Certification of Mitigation Plan Completion. On October 25, 2012, WECC sent notification to MILW accepting its Certification of Mitigation Plan completion and confirmed the actual completion date of the Mitigation Plan as September 14, 2012.

RELIABILITY IMPACT STATEMENT

4. A Transmission Operator is required to have transmission operators that have the responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its area. If an entity's transmission operators do not have the responsibility and clear decision-making authority to take whatever actions are necessary to ensure reliability in its area, reliable actions could be delayed allowing the grid to be operated in an unreliable state for an extended period of time. Milford generates power from ninety-seven wind turbines, having a generation capacity of 306 MW. Milford's generation is connected to the BES by the Milford's 88 mile, 345 kV transmission line. The sole purpose of this line is to integrate the intermittent wind generation from the facility; the line is radial in nature and does not serve any load. Because Milford's generation is intermittent, the transmission involved is limited in use. The failure to have operating staff with clear decision-making authority could result in the grid being operated in an unreliable manner. However, because Milford's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to the lack properly staffed operating personnel. In other words, Milford's generation is not base-load generation. Thus, if Milford was unable to deliver its generation, its BA could simply find replacement generation elsewhere or choose not to replace such generation without adversely affecting the reliability of the bulk power system. Because Milford's generation is replaceable, WECC determined that this violation posed a minimal risk to the BES.

PENALTY CONSIDERATIONS

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5. The Violation Risk Factor ("VRF") is High, the Violation Severity Level ("VSL") is Severe, and this violation posed minimal risk to the reliability of the BES.

The violation duration is as described above.

MITIGATING FACTORS

6. In assessing the penalty described herein, WECC considered Milford's internal compliance program. Specifically, WECC determined a mitigating factor was warranted for Milford's program based on the following factors. Milford's parent company ensures that compliance activities are part of each employee's individual annual goals. Milford conducts three weekly compliance activities, including a standing weekly meeting with corporate executives. Milford updates its board of directors on a quarterly basis regarding compliance matters. Milford's compliance staff is included on emails and correspondence associated with operations events. Milford has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance issues. Furthermore, since the time of the violations addressed herein, Milford has taken steps to further improve its compliance program. Milford's parent company has dedicated additional resources to its compliance staff and its existing compliance team has greater involvement in operational activities. Milford has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

Enforcement determined there were no aggravating factors warranting a penalty higher than the proposed penalty.

MILW was cooperative throughout the process.

MILW did not fail to complete any applicable compliance directives.

There was no evidence of any attempt by MILW to conceal the violation.

There was no evidence that MILW's violation was intentional.

WECC is not aware of any violations of this Reliability Standard by MILW affiliates or any involvement in MILW's activities such that this violation by MILW should be treated as recurring conduct.

O. NERC Reliability Standard TOP-004-2 Requirement 6

R6: *Transmission Operators, individually and jointly with other Transmission Operators, shall develop, maintain, and implement formal policies and procedures to provide for transmission reliability. These policies and procedures shall address the execution and coordination of activities that impact inter- and intra-Regional reliability, including:*

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R6.1 - Monitoring and controlling voltage levels and real and reactive power flows.

R6.2 - Switching transmission elements.

R6.3 - Planned outages of transmission elements.

R6.4 - Responding to IROL and SOL violations.

STIPULATED FACTS

1. On January 20, 2012, Milford self-certified potential noncompliance with TOP-004-2 R6. Subsequently, WECC sent Milford a Data Request Form seeking additional information regarding Milford's self-certification. On March 1, 2012, Milford responded to WECC's Data Request and stated that, "each Transmission Operator at [Milford] did not have in place formal policies and procedures to provide for transmission reliability as specified in TOP-004-2 R6.1, R6.2, R6.3 and R6.4."¹⁵ On March 13, 2012, a WECC SME reviewed Milford's self-certification and response to WECC's Data Request Form. The WECC SME concluded that Milford was in violation of TOP-004-2 R6 because it did not have in place formal policies and procedures to provide for transmission reliability as specified in the Standard. The WECC SME then referred the matter to Enforcement.

WECC'S DETERMINATION

2. Enforcement has reviewed the WECC SME's findings, as well as Milford's self-certification and response to WECC's Data Request Form. Enforcement has determined that Milford is in violation of TOP-004-2 R6 because it did not have in place formal policies and procedures to provide for transmission reliability as specified in the Standard. Enforcement has further determined that Milford was in violation of TOP-004-2 R6 for the period from May 18, 2010 to September 25, 2012, when MILW completed its Mitigation Plan.

MITIGATION PLAN DETAILS

3. On August 6, 2012, MILW submitted a Mitigation Plan to WECC with a proposed completion date of September 30, 2012. The Mitigation Plan required MILW to adopt and implement a transmission operators' manual that provides policies and procedures that address the execution and coordination of activities that impact inter and intra regional reliability. On September 4, 2012, WECC sent MILW notification of Mitigation Plan Acceptance. On October 3, 2012, MILW submitted a Certification of Mitigation Plan Completion. On October 25, 2012, WECC sent notification to MILW accepting its Certification of Mitigation Plan Completion and confirmed the actual completion date of the Mitigation Plan as September 25, 2012.

¹⁵ Data Request Form, TOP-004-2 R6 (March 1, 2012),

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RELIABILITY IMPACT STATEMENT

4. A Transmission Operator is required to have in place formal policies and procedures to provide for transmission reliability as specified in the Standard. If a Transmission Operator does not have formal policies and procedures in place to provide for transmission reliability as specified in Standard the BES could be operated in an unreliable state causing cascading outages. Milford generates power from ninety-seven wind turbines, having a generation capacity of 306 MW. Milford's generation is connected to the BES by the Milford's 88 mile, 345 kV transmission line. The sole purpose of this line is to integrate the intermittent wind generation from the facility; the line is radial in nature and does not serve any load. Milford's generation is intermittent; the transmission involved is limited in use. Because Milford's generation is non-firm, the host BA has adequate provisions to cover any additional time the generation was unavailable due to the lack properly staffed operating personnel. In other words, Milford's generation is not base-load generation. Thus, if Milford was unable to deliver its generation, its BA could simply find replacement generation elsewhere or choose not to replace such generation without adversely affecting the reliability of the bulk power system. Because Milford's generation is replaceable, WECC determined that this violation posed a minimal risk to the BES.

PENALTY CONSIDERATIONS

5. The Violation Risk Factor ("VRF") is Medium, the Violation Severity Level ("VSL") is Severe, and this violation posed minimal risk to the reliability of the BES.

The violation duration is as described above.

MITIGATING FACTORS

6. In assessing the penalty described herein, WECC considered Milford's internal compliance program. Specifically, WECC determined a mitigating factor was warranted for Milford's program based on the following factors. Milford's parent company ensures that compliance activities are part of each employee's individual annual goals. Milford conducts three weekly compliance activities, including a standing weekly meeting with corporate executives. Milford updates its board of directors on a quarterly basis regarding compliance matters. Milford's compliance staff is included on emails and correspondence associated with operations events. Milford has an anonymous hotline program where its personnel can anonymously report possible ethics and compliance issues. Furthermore, since the time of the violations addressed herein, Milford has taken steps to further improve its compliance program. Milford's parent company has dedicated additional resources to its compliance staff and its existing compliance team has greater involvement in operational activities. Milford has an internal auditing function independent of the compliance staff which can be tasked with monitoring to corporate goals, including compliance and reliability metrics.

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Enforcement determined there were no aggravating factors warranting a penalty higher than the proposed penalty.

MILW was cooperative throughout the process.

MILW did not fail to complete any applicable compliance directives.

There was no evidence of any attempt by MILW to conceal the violation.

There was no evidence that MILW's violation was intentional.

WECC is not aware of any violations of this Reliability Standard by MILW affiliates or any involvement in MILW's activities such that this violation by MILW should be treated as recurring conduct.

II. Registered Entity Statement

MILW is accepting the penalty amount set forth in Part III.A below to avoid further litigation. MILW neither admits nor denies the violations of Reliability Standards alleged by WECC, and in accepting the terms of this settlement, MILW does not concede that the penalty amount bears a reasonable relation to the seriousness of the alleged violations, takes into consideration MILW's efforts to remedy the alleged violation in a timely manner¹⁶, or is comparable to settlements reached by WECC concerning comparable alleged violations.

Nevertheless, consistent with the established features of MILW's internal compliance program, cited by WECC above, MILW is committed to compliance with the Reliability Standards. The managers, executives and individual employees of MILW's parent company have long incorporated compliance into annual performance goals and regular internal reporting. Employees are expected to raise any compliance concerns either in person (thanks to a company-wide open-door policy) or anonymously through a reporting hotline. MILW's parent company has reiterated its commitment to compliance by hiring a General Counsel and Chief Compliance Officer with experience in the electric regulatory field and a Manager of Electric Regulatory Compliance with broad experience including TO/TOP compliance. In short, MILW is committed to working with WECC to safeguard reliability and accepts this settlement and penalty in order to focus its compliance resources on maintaining reliability.

III. Settlement Terms

¹⁶ As a result of MILW's appeal of its registration as a transmission owner and transmission operator, WECC, NERC and MILW ultimately reached agreement on the specific transmission operator and transmission operator requirements with which MILW would need to comply; the resulting list of applicable transmission operator requirements was approved by the Federal Energy Regulatory Commission ("FERC") on June 13, 2012. See Cedar Creek Wind Energy, LLC, Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,124 (2012). WECC's initial notice of alleged violation, which was also issued on June 13, 2012, originally alleged that the alleged violations started on June 18, 2007 – more than two years before MILW began commercial operations.

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A. **Payment.** To settle this matter, MILW hereby agrees to pay \$81,000 to WECC via wire transfer or cashier's check. MILW shall make the funds payable to a WECC account identified in a Notice of Payment Due that WECC will send to MILW upon approval of this Agreement by NERC and the Federal Energy Regulatory Commission ("FERC"). MILW shall issue the payment to WECC no later than thirty days after receipt of the Notice of Payment Due. If this payment is not timely received, WECC shall assess, and MILW agrees to pay, an interest charge calculated according to the method set forth at 18 CFR §35.19(a)(2)(iii) beginning on the 31st day following issuance of the Notice of Payment Due.

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 and will post the Agreement publicly. If either NERC or FERC rejects the Agreement, then WECC will attempt to negotiate a revised settlement agreement with MILW 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. **Settlement Rationale.** WECC's determination of any penalty and sanction included in this settlement agreement 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 [the Registered Entity] to remedy the violation in a timely manner." In addition, WECC considers the direction of the Commission provided in Order No. 693, the NERC Sanction Guidelines, the Commission's Policy Statement on Enforcement, the Commission's July 3, 2008 Guidance Order, the Commission's August 27, 2010 Guidance Order, and all other applicable guidance from NERC and FERC.

To determine a penalty or sanction, WECC considers various factors including, but not limited to: (1) Violation Risk Factor; (2) Violation Severity Level, (3) risk to the reliability of the Bulk Power System ("BPS"), including the seriousness of the violation; (4) Violation Time Horizon (5) the violation's duration; (6) the Registered Entity's compliance history; (7) the Registered Entity's self-reports and voluntary corrective action; (8) the degree and quality of cooperation by the Registered Entity in the audit or investigation process, and in any remedial action; (9) the quality of the Registered Entity's compliance program; (10) any attempt by the Registered Entity to conceal the violation or any related information; (11) whether the violation was intentional; (12) any other relevant information or extenuating circumstances; and (13) the Registered Entity's ability to pay a penalty, as applicable.

WECC determined the penalty is appropriate in light of the stipulated facts and penalty considerations described above.

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III. 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 presumption or rule that ambiguities shall be construed against the drafting party shall apply to the interpretation or enforcement of this Agreement.

D. Entire Agreement. The Agreement represents the entire agreement between the Parties. No tender, offer, or promise of any kind outside the terms of the Agreement by any member, employee, officer, director, agent, or representative of MILW or WECC has been made to induce the signatories or the Parties to enter into the Agreement. 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. MILW agrees that the Agreement, upon approval by NERC and FERC, is a final settlement of all matters set forth herein. MILW waives its right to further hearings and appeal, unless and only to the extent that MILW 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 MILW in accordance with the Agreement, the CMEP and the NERC Rules of Procedure. In the event that MILW fails to comply with any of the terms of this Agreement, WECC shall have the right to pursue enforcement, penalty or sanction actions against MILW up to the maximum penalty allowed by the NERC Rules of Procedure. MILW 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. Consent. MILW consents to the use of WECC's determinations, findings, and conclusions set forth in this Agreement for the purpose of assessing the factors, including the factor of determining the company's history of violations, in accordance

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with the NERC Sanction Guidelines and applicable Commission orders and policy statements. Such use may be in any enforcement action or compliance proceeding undertaken by NERC and/or any Regional Entity; provided, however, that Registered Entity does not consent to the use of the specific acts set forth in this Agreement as the sole basis for any other action or proceeding brought by NERC and/or WECC, nor does MILW consent to the use of this Agreement by any other party in any other action or proceeding.

I. 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.

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

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

L. 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.

M. 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.

***[Remainder of page intentionally left blank -
signatures affixed to following page]***

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Agreed to and accepted:

WESTERN ELECTRICITY COORDINATING COUNCIL



Christopher Luras
Director of Enforcement

April 29, 2013
Date

MWCI Holdings, LLC, sole member of Milford Wind Corridor Phase I, LLC



Hallie Flint Gilman
Assistant Secretary

April 29, 2013
Date

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Self-Certification - 2011
WECC Notice of Requirement to Self-Certify - 2011

Entity: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

Address: 85 Wells Ave., Suite 305
Newton MA 02459

Start Date: November 01, 2011

Due Date: January 20, 2012

Submitted On: January 20, 2012

Entity Comment:

Standard Requirement	Description	Compliant?	Entity Comment
CIP-001-1 R1	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection.	Compliant	
CIP-001-1 R2	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.	Compliant	
CIP-001-1 R3	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.	Compliant	
CIP-001-1 R4	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and develop reporting procedures as appropriate to their circumstances.	Compliant	
CIP-001-1a R1	Each Reliability Coordinator, Balancing Authority, Transmission	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-001-1a R1	Operator, Generator Operator, and Load Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection.	Compliant	
CIP-001-1a R2	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.	Compliant	
CIP-001-1a R3	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.	Compliant	
CIP-001-1a R4	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and develop reporting procedures as appropriate to their circumstances.	Compliant	
CIP-001-2a R1	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection.	Compliant	
CIP-001-2a R2	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.	Compliant	
CIP-001-2a R3	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.	Compliant	
CIP-001-2a R4	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-001-2a R4	Police (RCMP) officials and develop reporting procedures as appropriate to their circumstances.	Compliant	
CIP-002-3 R1	<p>Critical Asset Identification Method - The Responsible Entity shall identify and document a risk-based assessment methodology to use to identify its Critical Assets.</p> <p>R1.1 - The Responsible Entity shall maintain documentation describing its risk-based assessment methodology that includes procedures and evaluation criteria.</p> <p>R1.2 - The risk-based assessment shall consider the following assets:</p> <p>R1.2.1 - Control centers and backup control centers performing the functions of the entities listed in the Applicability section of this standard.</p> <p>R1.2.2 - Transmission substations that support the reliable operation of the Bulk Electric System.</p> <p>R1.2.3 - Generation resources that support the reliable operation of the Bulk Electric System.</p> <p>R1.2.4 - Systems and facilities critical to system restoration, including blackstart generators and substations in the electrical path of transmission lines used for initial system restoration.</p> <p>R1.2.5 - Systems and facilities critical to automatic load shedding under a common control system capable of shedding 300 MW or more.</p> <p>R1.2.6 - Special Protection Systems that support the reliable operation of the Bulk Electric System.</p> <p>R1.2.7 - Any additional assets that support the reliable operation of the Bulk Electric System that the Responsible Entity deems appropriate to include in its assessment.</p>	Compliant	
CIP-002-3 R2	Critical Asset Identification - The Responsible Entity shall develop	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-002-3 R2	a list of its identified Critical Assets determined through an annual application of the risk-based assessment methodology required in R1. The Responsible Entity shall review this list at least annually, and update it as necessary.	Compliant	
CIP-002-3 R3	<p>Critical Cyber Asset Identification - Using the list of Critical Assets developed pursuant to Requirement R2, the Responsible Entity shall develop a list of associated Critical Cyber Assets essential to the operation of the Critical Asset. Examples at control centers and backup control centers include systems and facilities at master and remote sites that provide monitoring and control, automatic generation control, real-time power system modeling, and real-time inter-utility data exchange. The Responsible Entity shall review this list at least annually, and update it as necessary. For the purpose of Standard CIP-002-3, Critical Cyber Assets are further qualified to be those having at least one of the following characteristics:</p> <p>R3.1 - The Cyber Asset uses a routable protocol to communicate outside the Electronic Security Perimeter; or,</p> <p>R3.2 - The Cyber Asset uses a routable protocol within a control center; or,</p> <p>R3.3 - The Cyber Asset is dial-up accessible.</p>	Compliant	
CIP-002-3 R4	Annual Approval - The senior manager or delegate(s) shall approve annually the risk-based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets. Based on Requirements R1, R2, and R3 the Responsible Entity may determine that it has no Critical Assets or Critical Cyber Assets. The Responsible Entity shall keep a signed and dated record of the senior manager or delegate(s)'s approval of the risk-based assessment methodology, the list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null.)	Compliant	
CIP-003-3 R1	Cyber Security Policy - The Responsible Entity shall document and implement a cyber security policy that represents management's commitment and ability to secure its Critical Cyber Assets. The Responsible Entity shall, at minimum, ensure the following:	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-003-3 R1	<p>R1.1 - The cyber security policy addresses the requirements in Standards CIP-002-3 through CIP-009-3, including provision for emergency situations.</p> <p>R1.2 - The cyber security policy is readily available to all personnel who have access to, or are responsible for, Critical Cyber Assets.</p> <p>R1.3 - Annual review and approval of the cyber security policy by the senior manager assigned pursuant to R2.</p>	Compliant	
CIP-003-3 R2	<p>Leadership - The Responsible Entity shall assign a single senior manager with overall responsibility and authority for leading and managing the entity's implementation of, and adherence to, Standards CIP-002-3 through CIP-009-3.</p> <p>R2.1 - The senior manager shall be identified by name, title, and date of designation.</p> <p>R2.2 - Changes to the senior manager must be documented within thirty calendar days of the effective date.</p> <p>R2.3 - Where allowed by Standards CIP-002-3 through CIP-009-3, the senior manager may delegate authority for specific actions to a named delegate or delegates. These delegations shall be documented in the same manner as R2.1 and R2.2, and approved by the senior manager.</p> <p>R2.4 - The senior manager or delegate(s), shall authorize and document any exception from the requirements of the cyber security policy.</p>	Compliant	
CIP-003-3 R3	<p>Exceptions - Instances where the Responsible Entity cannot conform to its cyber security policy must be documented as exceptions and authorized by the senior manager or delegate(s).</p> <p>R3.1 - Exceptions to the Responsible Entity's cyber security policy must be documented within thirty days of being approved by the senior manager or delegate(s).</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-003-3 R3	<p>R3.2 - Documented exceptions to the cyber security policy must include an explanation as to why the exception is necessary and any compensating measures.</p> <p>R3.3 - Authorized exceptions to the cyber security policy must be reviewed and approved annually by the senior manager or delegate(s) to ensure the exceptions are still required and valid. Such review and approval shall be documented.</p>	Compliant	
CIP-003-3 R4	<p>Information Protection - The Responsible Entity shall implement and document a program to identify, classify, and protect information associated with Critical Cyber Assets.</p> <p>R4.1 - The Critical Cyber Asset information to be protected shall include, at a minimum and regardless of media type, operational procedures, lists as required in Standard CIP-002-3, network topology or similar diagrams, floor plans of computing centers that contain Critical Cyber Assets, equipment layouts of Critical Cyber Assets, disaster recovery plans, incident response plans, and security configuration information.</p> <p>R4.2 - The Responsible Entity shall classify information to be protected under this program based on the sensitivity of the Critical Cyber Asset information.</p> <p>R4.3 - The Responsible Entity shall, at least annually, assess adherence to its Critical Cyber Asset information protection program, document the assessment results, and implement an action plan to remediate deficiencies identified during the assessment.</p>	Compliant	
CIP-003-3 R5	<p>Access Control - The Responsible Entity shall document and implement a program for managing access to protected Critical Cyber Asset information.</p> <p>R5.1 - The Responsible Entity shall maintain a list of designated personnel who are responsible for authorizing logical or physical access to protected information.</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-003-3 R5	<p>R5.1.1 - Personnel shall be identified by name, title, and the information for which they are responsible for authorizing access.</p> <p>R5.1.2 - The list of personnel responsible for authorizing access to protected information shall be verified at least annually.</p> <p>R5.2 - The Responsible Entity shall review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with the Responsible Entity's needs and appropriate personnel roles and responsibilities.</p> <p>R5.3 - The Responsible Entity shall assess and document at least annually the processes for controlling access privileges to protected information.</p>	Compliant	
CIP-003-3 R6	Change Control and Configuration Management - The Responsible Entity shall establish and document a process of change control and configuration management for adding, modifying, replacing, or removing Critical Cyber Asset hardware or software, and implement supporting configuration management activities to identify, control and document all entity or vendorrelated changes to hardware and software components of Critical Cyber Assets pursuant to the change control process.	Compliant	
CIP-004-3 R1	Awareness -The Responsible Entity shall establish, document, implement, and maintain a security awareness program to ensure personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets receive on-going reinforcement in sound security practices. The program shall include security awareness reinforcement on at least a quarterly basis using mechanisms such as: - Direct communications (e.g., emails, memos, computer based training, etc.); - Indirect communications (e.g., posters, intranet, brochures, etc.); - Management support and reinforcement (e.g., presentations, meetings, etc.).	Compliant	
CIP-004-3 R2	Training - The Responsible Entity shall establish, document, implement, and maintain an annual cyber security training program for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. The cyber	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-004-3 R2	<p>security training program shall be reviewed annually, at a minimum, and shall be updated whenever necessary.</p> <p>R2.1 - This program will ensure that all personnel having such access to Critical Cyber Assets, including contractors and service vendors, are trained prior to their being granted such access except in specified circumstances such as an emergency.</p> <p>R2.2 - Training shall cover the policies, access controls, and procedures as developed for the Critical Cyber Assets covered by CIP-004-3, and include, at a minimum, the following required items appropriate to personnel roles and responsibilities:</p> <p>R2.2.1 - The proper use of Critical Cyber Assets;</p> <p>R2.2.2 - Physical and electronic access controls to Critical Cyber Assets;</p> <p>R2.2.3 - The proper handling of Critical Cyber Asset information; and,</p> <p>R2.2.4 - Action plans and procedures to recover or re-establish Critical Cyber Assets and access thereto following a Cyber Security Incident.</p> <p>R2.3 - The Responsible Entity shall maintain documentation that training is conducted at least annually, including the date the training was completed and attendance records.</p>	Compliant	
CIP-004-3 R3	<p>Personnel Risk Assessment - The Responsible Entity shall have a documented personnel risk assessment program, in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements, for personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets. A personnel risk assessment shall be conducted pursuant to that program prior to such personnel being granted such access except in specified circumstances such as an emergency. The personnel risk assessment program shall at a minimum include:</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-004-3 R3	<p>R3.1 - The Responsible Entity shall ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven-year criminal check. The Responsible Entity may conduct more detailed reviews, as permitted by law and subject to existing collective bargaining unit agreements, depending upon the criticality of the position.</p> <p>R3.2 - The Responsible Entity shall update each personnel risk assessment at least every seven years after the initial personnel risk assessment or for cause.</p> <p>R3.3 - The Responsible Entity shall document the results of personnel risk assessments of its personnel having authorized cyber or authorized unescorted physical access to Critical Cyber Assets, and that personnel risk assessments of contractor and service vendor personnel with such access are conducted pursuant to Standard CIP-004-3.</p>	Compliant	
CIP-004-3 R4	<p>Access - The Responsible Entity shall maintain list(s) of personnel with authorized cyber or authorized unescorted physical access to Critical Cyber Assets, including their specific electronic and physical access rights to Critical Cyber Assets.</p> <p>R4.1 - The Responsible Entity shall review the list(s) of its personnel who have such access to Critical Cyber Assets quarterly, and update the list(s) within seven calendar days of any change of personnel with such access to Critical Cyber Assets, or any change in the access rights of such personnel. The Responsible Entity shall ensure access list(s) for contractors and service vendors are properly maintained.</p> <p>R4.2 - The Responsible Entity shall revoke such access to Critical Cyber Assets within 24 hours for personnel terminated for cause and within seven calendar days for personnel who no longer require such access to Critical Cyber Assets.</p>	Compliant	
CIP-005-3 R1	Electronic Security Perimeter - The Responsible Entity shall ensure that every Critical Cyber Asset resides within an Electronic Security Perimeter. The Responsible Entity shall identify and	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-005-3 R1	<p>document the Electronic Security Perimeter(s) and all access points to the perimeter(s).</p> <p>R1.1 - Access points to the Electronic Security Perimeter(s) shall include any externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s).</p> <p>R1.2 - For a dial-up accessible Critical Cyber Asset that uses a non-routable protocol, the Responsible Entity shall define an Electronic Security Perimeter for that single access point at the dial-up device.</p> <p>R1.3 - Communication links connecting discrete Electronic Security Perimeters shall not be considered part of the Electronic Security Perimeter. However, end points of these communication links within the Electronic Security Perimeter(s) shall be considered access points to the Electronic Security Perimeter(s).</p> <p>R1.4 - Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be identified and protected pursuant to the requirements of Standard CIP-005-3.</p> <p>R1.5 - Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall be afforded the protective measures as a specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3; Standard CIP-005-3 Requirements R2 and R3; Standard CIP-006-3 Requirement R3; Standard CIP-007-3 Requirements R1 and R3 through R9; Standard CIP-008-3; and Standard CIP-009-3.</p> <p>R1.6 - The Responsible Entity shall maintain documentation of Electronic Security Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the Electronic Security Perimeter(s), all electronic access points to the Electronic Security Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of these access points.</p>	Compliant	
CIP-005-3 R2	Electronic Access Controls - The Responsible Entity shall implement and document the organizational processes and	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-005-3 R2	<p>technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s).</p> <p>R2.1 - These processes and mechanisms shall use an access control model that denies access by default, such that explicit access permissions must be specified.</p> <p>R2.2 - At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall enable only ports and services required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, and shall document, individually or by specified grouping, the configuration of those ports and services.</p> <p>R2.3 - The Responsible Entity shall implement and maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s).</p> <p>R2.4 - Where external interactive access into the Electronic Security Perimeter has been enabled, the Responsible Entity shall implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible.</p> <p>R2.5 - The required documentation shall, at least, identify and describe:</p> <p>R2.5.1 - The processes for access request and authorization.</p> <p>R2.5.2 - The authentication methods.</p> <p>R2.5.3 - The review process for authorization rights, in accordance with Standard CIP-004-3 Requirement R4.</p> <p>R2.5.4 - The controls used to secure dial-up accessible connections.</p> <p>R2.6 - Appropriate Use Banner - Where technically feasible,</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-005-3 R2	electronic access control devices shall display an appropriate use banner on the user screen upon all interactive access attempts. The Responsible Entity shall maintain a document identifying the content of the banner.	Compliant	
CIP-005-3 R3	<p>Monitoring Electronic Access - The Responsible Entity shall implement and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a day, seven days a week.</p> <p>R3.1 - For dial-up accessible Critical Cyber Assets that use non-routable protocols, the Responsible Entity shall implement and document monitoring process(es) at each access point to the dial-up device, where technically feasible.</p> <p>R3.2 - Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days.</p>	Compliant	
CIP-005-3 R4	<p>Cyber Vulnerability Assessment - The Responsible Entity shall perform a cyber vulnerability assessment of the electronic access points to the Electronic Security Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following:</p> <p>R4.1 - A document identifying the vulnerability assessment process;</p> <p>R4.2 - A review to verify that only ports and services required for operations at these access points are enabled;</p> <p>R4.3 - The discovery of all access points to the Electronic Security Perimeter;</p> <p>R4.4 - A review of controls for default accounts, passwords, and</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-005-3 R4	<p>network management community strings;</p> <p>R4.5 - Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan.</p>	Compliant	
CIP-005-3 R5	<p>Documentation Review and Maintenance - The Responsible Entity shall review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005-3.</p> <p>R5.1 - The Responsible Entity shall ensure that all documentation required by Standard CIP-005-3 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005-3 at least annually.</p> <p>R5.2 - The Responsible Entity shall update the documentation to reflect the modification of the network or controls within ninety calendar days of the change.</p> <p>R5.3 - The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-3.</p>	Compliant	
CIP-005-3a R1	<p>Standard CIP-005-3 requires the identification and protection of the Electronic Security Perimeter(s) inside which all Critical Cyber Assets reside, as well as all access points on the perimeter. Standard CIP-005-3 should be read as part of a group of standards numbered Standards CIP-002-3 through CIP-009-3.</p> <p>R1.1 - Access points to the Electronic Security Perimeter(s) shall include any externally connected communication end point (for example, dial-up modems) terminating at any device within the Electronic Security Perimeter(s).</p> <p>R1.2 - For a dial-up accessible Critical Cyber Asset that uses a non-routable protocol, the Responsible Entity shall define an Electronic Security Perimeter for that single access point at the dial-up device.</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-005-3a R1	<p>R1.3 - Communication links connecting discrete Electronic Security Perimeters shall not be considered part of the Electronic Security Perimeter. However, end points of these communication links within the Electronic Security Perimeter(s) shall be considered access points to the Electronic Security Perimeter(s).</p> <p>R1.4 - Any non-critical Cyber Asset within a defined Electronic Security Perimeter shall be identified and protected pursuant to the requirements of Standard CIP-005-3.</p> <p>R1.5 - Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall be afforded the protective measures as a specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3; Standard CIP-005-3 Requirements R2 and R3; Standard CIP-006-3 Requirement R3; Standard CIP-007-3 Requirements R1 and R3 through R9; Standard CIP-008-3; and Standard CIP-009-3.</p> <p>R1.6 - The Responsible Entity shall maintain documentation of Electronic Security Perimeter(s), all interconnected Critical and non-critical Cyber Assets within the Electronic Security Perimeter(s), all electronic access points to the Electronic Security Perimeter(s) and the Cyber Assets deployed for the access control and monitoring of these access points.</p>	Compliant	
CIP-005-3a R2	<p>Electronic Access Controls — The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for control of electronic access at all electronic access points to the Electronic Security Perimeter(s).</p> <p>R2.1 - These processes and mechanisms shall use an access control model that denies access by default, such that explicit access permissions must be specified.</p> <p>R2.2 - At all access points to the Electronic Security Perimeter(s), the Responsible Entity shall enable only ports and services required for operations and for monitoring Cyber Assets within the Electronic Security Perimeter, and shall document, individually or by specified grouping, the configuration of those ports and</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-005-3a R2	<p>services.</p> <p>R2.3 - The Responsible Entity shall implement and maintain a procedure for securing dial-up access to the Electronic Security Perimeter(s).</p> <p>R2.4 - Where external interactive access into the Electronic Security Perimeter has been enabled, the Responsible Entity shall implement strong procedural or technical controls at the access points to ensure authenticity of the accessing party, where technically feasible.</p> <p>R2.5 - The required documentation shall, at least, identify and describe:</p> <p>R2.5.1 - The processes for access request and authorization.</p> <p>R2.5.2 - The authentication methods.</p> <p>R2.5.3 - The review process for authorization rights, in accordance with Standard CIP-004-3 Requirement R4.</p> <p>R2.5.4 - The controls used to secure dial-up accessible connections.</p> <p>R2.6 - Appropriate Use Banner —Where technically feasible, electronic access control devices shall display an appropriate use banner on the user screen upon all interactive access attempts. The Responsible Entity shall maintain a document identifying the content of the banner.</p>	Compliant	
CIP-005-3a R3	<p>Monitoring Electronic Access —The Responsible Entity shall implement and document an electronic or manual process(es) for monitoring and logging access at access points to the Electronic Security Perimeter(s) twenty-four hours a day, seven days a week.</p> <p>R3.1 - For dial-up accessible Critical Cyber Assets that use non-routable protocols, the Responsible Entity shall implement and document monitoring process(es) at each access point to the dial-</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-005-3a R3	<p>up device, where technically feasible.</p> <p>R3.2 - Where technically feasible, the security monitoring process(es) shall detect and alert for attempts at or actual unauthorized accesses. These alerts shall provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, the Responsible Entity shall review or otherwise assess access logs for attempts at or actual unauthorized accesses at least every ninety calendar days.</p>	Compliant	
CIP-005-3a R4	<p>Cyber Vulnerability Assessment — The Responsible Entity shall perform a cyber vulnerability assessment of the electronic access points to the Electronic Security Perimeter(s) at least annually. The vulnerability assessment shall include, at a minimum, the following:</p> <p>R4.1 - A document identifying the vulnerability assessment process;</p> <p>R4.2 - A review to verify that only ports and services required for operations at these access points are enabled;</p> <p>R4.3 - The discovery of all access points to the Electronic Security Perimeter;</p> <p>R4.4 - A review of controls for default accounts, passwords, and network management community strings;</p> <p>R4.5 - Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan.</p>	Compliant	
CIP-005-3a R5	<p>Documentation Review and Maintenance —The Responsible Entity shall review, update, and maintain all documentation to support compliance with the requirements of Standard CIP-005-3.</p> <p>R5.1 - The Responsible Entity shall ensure that all documentation required by Standard CIP-005-3 reflect current configurations and processes and shall review the documents and procedures referenced in Standard CIP-005-3 at least annually.</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-005-3a R5	<p>R5.2 - The Responsible Entity shall update the documentation to reflect the modification of the network or controls within ninety calendar days of the change.</p> <p>R5.3 - The Responsible Entity shall retain electronic access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-3.</p>	Compliant	
CIP-006-3c R1	<p>Physical Security Plan - The Responsible Entity shall document, implement, and maintain a physical security plan, approved by the senior manager or delegate(s) that shall address, at a minimum, the following:</p> <p>R1.1 - All Cyber Assets within an Electronic Security Perimeter shall reside within an identified Physical Security Perimeter. Where a completely enclosed ("six-wall") border cannot be established, the Responsible Entity shall deploy and document alternative measures to control physical access to such Cyber Assets.</p> <p>R1.2 - Identification of all physical access points through each Physical Security Perimeter and measures to control entry at those access points.</p> <p>R1.3 - Processes, tools, and procedures to monitor physical access to the perimeter(s).</p> <p>R1.4 - Appropriate use of physical access controls as described in Requirement R4 including visitor pass management, response to loss, and prohibition of inappropriate use of physical access controls.</p> <p>R1.5 - Review of access authorization requests and revocation of access authorization, in accordance with CIP-004-3 Requirement R4.</p> <p>R1.6 - A visitor control program for visitors (personnel without authorized unescorted access to a Physical Security Perimeter),</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-006-3c R1	<p>containing at a minimum the following:</p> <p>R1.6.1 - Logs (manual or automated) to document the entry and exit of visitors, including the date and time, to and from Physical Security Perimeters.</p> <p>R1.6.2 - Continuous escorted access of visitors within the Physical Security Perimeter.</p> <p>R1.7 - Update of the physical security plan within thirty calendar days of the completion of any physical security system redesign or reconfiguration, including, but not limited to, addition or removal of access points through the Physical Security Perimeter, physical access controls, monitoring controls, or logging controls.</p> <p>R1.8 - Annual review of the physical security plan.</p>	Compliant	
CIP-006-3c R2	<p>Protection of Physical Access Control Systems - Cyber Assets that authorize and/or log access to the Physical Security Perimeter(s), exclusive of hardware at the Physical Security Perimeter access point such as electronic lock control mechanisms and badge readers, shall:</p> <p>R2.1 - Be protected from unauthorized physical access.</p> <p>R2.2 - Be afforded the protective measures specified in Standard CIP-003-3; Standard CIP-004-3 Requirement R3; Standard CIP-005-3 Requirements R2 and R3; Standard CIP-006-3 Requirements R4 and R5; Standard CIP-007-3; Standard CIP-008-3; and Standard CIP-009-3.</p>	Compliant	
CIP-006-3c R3	<p>Protection of Electronic Access Control Systems - Cyber Assets used in the access control and/or monitoring of the Electronic Security Perimeter(s) shall reside within an identified Physical Security Perimeter.</p>	Compliant	
CIP-006-3c R4	<p>Physical Access Controls - The Responsible Entity shall document and implement the operational and procedural controls to manage physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. The Responsible Entity shall implement one or more of the</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-006-3c R4	following physical access methods: - Card Key: A means of electronic access where the access rights of the card holder are predefined in a computer database. Access rights may differ from one perimeter to another. - Special Locks: These include, but are not limited to, locks with "restricted key" systems, magnetic locks that can be operated remotely, and "man-trap" systems. - Security Personnel: Personnel responsible for controlling physical access who may reside on-site or at a monitoring station. - Other Authentication Devices: Biometric, keypad, token, or other equivalent devices that control physical access to the Critical Cyber Assets.	Compliant	
CIP-006-3c R5	Monitoring Physical Access - The Responsible Entity shall document and implement the technical and procedural controls for monitoring physical access at all access points to the Physical Security Perimeter(s) twenty-four hours a day, seven days a week. Unauthorized access attempts shall be reviewed immediately and handled in accordance with the procedures specified in Requirement CIP-008-3. One or more of the following monitoring methods shall be used: - Alarm Systems: Systems that alarm to indicate a door, gate or window has been opened without authorization. These alarms must provide for immediate notification to personnel responsible for response. - Human Observation of Access Points: Monitoring of physical access points by authorized personnel as specified in Requirement R4.	Compliant	
CIP-006-3c R6	Logging Physical Access - Logging shall record sufficient information to uniquely identify individuals and the time of access twenty-four hours a day, seven days a week. The Responsible Entity shall implement and document the technical and procedural mechanisms for logging physical entry at all access points to the Physical Security Perimeter(s) using one or more of the following logging methods or their equivalent: - Computerized Logging: Electronic logs produced by the Responsible Entity's selected access control and monitoring method. - Video Recording: Electronic capture of video images of sufficient quality to determine identity. - Manual Logging: A log book or sign-in sheet, or other record of physical access maintained by security or other personnel authorized to control and monitor physical access as specified in Requirement R4.	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-006-3c R7	Access Log Retention - The Responsible Entity shall retain physical access logs for at least ninety calendar days. Logs related to reportable incidents shall be kept in accordance with the requirements of Standard CIP-008-3.	Compliant	
CIP-006-3c R8	<p>Maintenance and Testing - The Responsible Entity shall implement a maintenance and testing program to ensure that all physical security systems under Requirements R4, R5, and R6 function properly. The program must include, at a minimum, the following:</p> <p>R8.1 - Testing and maintenance of all physical security mechanisms on a cycle no longer than three years.</p> <p>R8.2 - Retention of testing and maintenance records for the cycle determined by the Responsible Entity in Requirement R8.1.</p> <p>R8.3 - Retention of outage records regarding access controls, logging, and monitoring for a minimum of one calendar year.</p>	Compliant	
CIP-007-3 R1	<p>Test Procedures - The Responsible Entity shall ensure that new Cyber Assets and significant changes to existing Cyber Assets within the Electronic Security Perimeter do not adversely affect existing cyber security controls. For purposes of Standard CIP-007-3, a significant change shall, at a minimum, include implementation of security patches, cumulative service packs, vendor releases, and version upgrades of operating systems, applications, database platforms, or other third-party software or firmware.</p> <p>R1.1 - The Responsible Entity shall create, implement, and maintain cyber security test procedures in a manner that minimizes adverse effects on the production system or its operation.</p> <p>R1.2 - The Responsible Entity shall document that testing is performed in a manner that reflects the production environment.</p> <p>R1.3 - The Responsible Entity shall document test results.</p>	Compliant	
CIP-007-3 R2	Ports and Services - The Responsible Entity shall establish,	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-007-3 R2	<p>document and implement a process to ensure that only those ports and services required for normal and emergency operations are enabled.</p> <p>R2.1 - The Responsible Entity shall enable only those ports and services required for normal and emergency operations.</p> <p>R2.2 - The Responsible Entity shall disable other ports and services, including those used for testing purposes, prior to production use of all Cyber Assets inside the Electronic Security Perimeter(s).</p> <p>R2.3 - In the case where unused ports and services cannot be disabled due to technical limitations, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure.</p>	Compliant	
CIP-007-3 R3	<p>Security Patch Management - The Responsible Entity, either separately or as a component of the documented configuration management process specified in CIP-003-3 Requirement R6, shall establish, document and implement a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the Electronic Security Perimeter(s).</p> <p>R3.1 - The Responsible Entity shall document the assessment of security patches and security upgrades for applicability within thirty calendar days of availability of the patches or upgrades.</p> <p>R3.2 - The Responsible Entity shall document the implementation of security patches. In any case where the patch is not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure.</p>	Compliant	
CIP-007-3 R4	<p>Malicious Software Prevention - The Responsible Entity shall use anti-virus software and other malicious software ("malware") prevention tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s).</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-007-3 R4	<p>R4.1 - The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure.</p> <p>R4.2 - The Responsible Entity shall document and implement a process for the update of anti-virus and malware prevention "signatures." The process must address testing and installing the signatures.</p>	Compliant	
CIP-007-3 R5	<p>Account Management - The Responsible Entity shall establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access.</p> <p>R5.1 - The Responsible Entity shall ensure that individual and shared system accounts and authorized access permissions are consistent with the concept of "need to know" with respect to work functions performed.</p> <p>R5.1.1 - The Responsible Entity shall ensure that user accounts are implemented as approved by designated personnel. Refer to Standard CIP-003-3 Requirement R5.</p> <p>R5.1.2 - The Responsible Entity shall establish methods, processes, and procedures that generate logs of sufficient detail to create historical audit trails of individual user account access activity for a minimum of ninety days.</p> <p>R5.1.3 - The Responsible Entity shall review, at least annually, user accounts to verify access privileges are in accordance with Standard CIP-003-3 Requirement R5 and Standard CIP-004-3 Requirement R4.</p> <p>R5.2 - The Responsible Entity shall implement a policy to minimize and manage the scope and acceptable use of administrator, shared, and other generic account privileges</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-007-3 R5	<p>including factory default accounts.</p> <p>R5.2.1 - The policy shall include the removal, disabling, or renaming of such accounts where possible. For such accounts that must remain enabled, passwords shall be changed prior to putting any system into service.</p> <p>R5.2.2 - The Responsible Entity shall identify those individuals with access to shared accounts.</p> <p>R5.2.3 - Where such accounts must be shared, the Responsible Entity shall have a policy for managing the use of such accounts that limits access to only those with authorization, an audit trail of the account use (automated or manual), and steps for securing the account in the event of personnel changes (for example, change in assignment or termination).</p> <p>R5.3 - At a minimum, the Responsible Entity shall require and use passwords, subject to the following, as technically feasible:</p> <p>R5.3.1 - Each password shall be a minimum of six characters.</p> <p>R5.3.2 - Each password shall consist of a combination of alpha, numeric, and "special" characters.</p> <p>R5.3.3 - Each password shall be changed at least annually, or more frequently based on risk.</p>	Compliant	
CIP-007-3 R6	<p>Security Status Monitoring - The Responsible Entity shall ensure that all Cyber Assets within the Electronic Security Perimeter, as technically feasible, implement automated tools or organizational process controls to monitor system events that are related to cyber security.</p> <p>R6.1 - The Responsible Entity shall implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the Electronic Security Perimeter.</p> <p>R6.2 - The security monitoring controls shall issue automated or</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-007-3 R6	<p>manual alerts for detected Cyber Security Incidents.</p> <p>R6.3 - The Responsible Entity shall maintain logs of system events related to cyber security, where technically feasible, to support incident response as required in Standard CIP-008-3.</p> <p>R6.4 - The Responsible Entity shall retain all logs specified in Requirement R6 for ninety calendar days.</p> <p>R6.5 - The Responsible Entity shall review logs of system events related to cyber security and maintain records documenting review of logs.</p>	Compliant	
CIP-007-3 R7	<p>Disposal or Redeployment - The Responsible Entity shall establish and implement formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the Electronic Security Perimeter(s) as identified and documented in Standard CIP-005-3.</p> <p>R7.1 - Prior to the disposal of such assets, the Responsible Entity shall destroy or erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data.</p> <p>R7.2 - Prior to redeployment of such assets, the Responsible Entity shall, at a minimum, erase the data storage media to prevent unauthorized retrieval of sensitive cyber security or reliability data.</p> <p>R7.3 - The Responsible Entity shall maintain records that such assets were disposed of or redeployed in accordance with documented procedures.</p>	Compliant	
CIP-007-3 R8	<p>Cyber Vulnerability Assessment - The Responsible Entity shall perform a cyber vulnerability assessment of all Cyber Assets within the Electronic Security Perimeter at least annually. The vulnerability assessment shall include, at a minimum, the following:</p> <p>R8.1 - A document identifying the vulnerability assessment process;</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-007-3 R8	<p>R8.2 - A review to verify that only ports and services required for operation of the Cyber Assets within the Electronic Security Perimeter are enabled;</p> <p>R8.3 - A review of controls for default accounts; and,</p> <p>R8.4 - Documentation of the results of the assessment, the action plan to remediate or mitigate vulnerabilities identified in the assessment, and the execution status of that action plan.</p>	Compliant	
CIP-007-3 R9	Documentation Review and Maintenance - The Responsible Entity shall review and update the documentation specified in Standard CIP-007-3 at least annually. Changes resulting from modifications to the systems or controls shall be documented within thirty calendar days of the change being completed.	Compliant	
CIP-008-3 R1	<p>Cyber Security Incident Response Plan - The Responsible Entity shall develop and maintain a Cyber Security Incident response plan and implement the plan in response to Cyber Security Incidents. The Cyber Security Incident response plan shall address, at a minimum, the following:</p> <p>R1.1 - Procedures to characterize and classify events as reportable Cyber Security Incidents.</p> <p>R1.2 - Response actions, including roles and responsibilities of Cyber Security Incident response teams, Cyber Security Incident handling procedures, and communication plans.</p> <p>R1.3 - Process for reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES-ISAC). The Responsible Entity must ensure that all reportable Cyber Security Incidents are reported to the ES-ISAC either directly or through an intermediary.</p> <p>R1.4 - Process for updating the Cyber Security Incident response plan within thirty calendar days of any changes.</p> <p>R1.5 - Process for ensuring that the Cyber Security Incident</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-008-3 R1	<p>response plan is reviewed at least annually.</p> <p>R1.6 - Process for ensuring the Cyber Security Incident response plan is tested at least annually. A test of the Cyber Security Incident response plan can range from a paper drill, to a full operational exercise, to the response to an actual incident</p>	Compliant	
CIP-008-3 R2	<p>Cyber Security Incident Documentation - The Responsible Entity shall keep relevant documentation related to Cyber Security Incidents reportable per Requirement R1.1 for three calendar years.</p>	Compliant	
CIP-009-3 R1	<p>Recovery Plans - The Responsible Entity shall create and annually review recovery plan(s) for Critical Cyber Assets. The recovery plan(s) shall address at a minimum the following:</p> <p>R1.1 - Specify the required actions in response to events or conditions of varying duration and severity that would activate the recovery plan(s).</p> <p>R1.2 - Define the roles and responsibilities of responders.</p>	Compliant	
CIP-009-3 R2	<p>Exercises - The recovery plan(s) shall be exercised at least annually. An exercise of the recovery plan(s) can range from a paper drill, to a full operational exercise, to recovery from an actual incident.</p>	Compliant	
CIP-009-3 R3	<p>Change Control - Recovery plan(s) shall be updated to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident. Updates shall be communicated to personnel responsible for the activation and implementation of the recovery plan(s) within thirty calendar days of the change being completed.</p>	Compliant	
CIP-009-3 R4	<p>Backup and Restore - The recovery plan(s) shall include processes and procedures for the backup and storage of information required to successfully restore Critical Cyber Assets. For example, backups may include spare electronic components or equipment, written documentation of configuration settings, tape backup, etc.</p>	Compliant	
CIP-009-3 R5	<p>Testing Backup Media - Information essential to recovery that is stored on backup media shall be tested at least annually to</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
CIP-009-3 R5	ensure that the information is available. Testing can be completed off site.	Compliant	
COM-001-1.1 R1	<p>Each Reliability Coordinator, Transmission Operator and Balancing Authority shall provide adequate and reliable telecommunications facilities for the exchange of Interconnection and operating information:</p> <p>R1.1 - Internally.</p> <p>R1.2 - Between the Reliability Coordinator and its Transmission Operators and Balancing Authorities.</p> <p>R1.3 - With other Reliability Coordinators, Transmission Operators, and Balancing Authorities as necessary to maintain reliability.</p> <p>R1.4 - Where applicable, these facilities shall be redundant and diversely routed.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
COM-001-1.1 R2	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall manage, alarm, test and/or actively monitor vital telecommunications facilities. Special attention shall be given to emergency telecommunications facilities and equipment not used for routine communications.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
COM-001-1.1 R3	Each Reliability Coordinator, Transmission Operator and Balancing Authority shall provide a means to coordinate telecommunications among their respective areas. This coordination shall include the ability to investigate and recommend solutions to telecommunications problems within the area and with other areas.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
COM-001-1.1 R4	Unless agreed to otherwise, each Reliability Coordinator, Transmission Operator, and Balancing Authority shall use English as the language for all communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected Bulk Electric System. Transmission Operators and Balancing Authorities may use an alternate language for internal operations.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
COM-001-1.1 R5	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall have written operating instructions and	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC,

Standard Requirement	Description	Compliant?	Entity Comment
COM-001-1.1 R5	procedures to enable continued operation of the system during the loss of telecommunications facilities.	Not Applicable	NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
COM-001-1.1 R6	Each NERCNet User Organization shall adhere to the requirements in Attachment 1-COM-001, "NERCNet Security Policy."	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
COM-002-2 R1	<p>Each Transmission Operator, Balancing Authority, and Generator Operator shall have communications (voice and data links) with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators. Such communications shall be staffed and available for addressing a real-time emergency condition.</p> <p>R1.1 - Each Balancing Authority and Transmission Operator shall notify its Reliability Coordinator, and all other potentially affected Balancing Authorities and Transmission Operators through predetermined communication paths of any condition that could threaten the reliability of its area or when firm load shedding is anticipated.</p>	Compliant	
COM-002-2 R2	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall issue directives in a clear, concise, and definitive manner; shall ensure the recipient of the directive repeats the information back correctly; and shall acknowledge the response as correct or repeat the original statement to resolve any misunderstandings.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
EOP-001-0 R2	The Transmission Operator shall have an emergency load reduction plan for all identified IROLs. The plan shall include the details on how the Transmission Operator will implement load reduction in sufficient amount and time to mitigate the IROL violation before system separation or collapse would occur. The load reduction plan must be capable of being implemented within 30 minutes.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
EOP-001-0 R3	<p>Each Transmission Operator and Balancing Authority shall:</p> <p>R3.1 - Develop, maintain, and implement a set of plans to mitigate operating emergencies for insufficient generating</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list

Standard Requirement	Description	Compliant?	Entity Comment
EOP-001-0 R3	<p>capacity.</p> <p>R3.2 - Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.</p> <p>R3.3 - Develop, maintain, and implement a set of plans for load shedding.</p> <p>R3.4 - Develop, maintain, and implement a set of plans for system restoration.</p>	Not Applicable	and thus is not applicable to Milford.
EOP-001-0 R5	Each Transmission Operator and Balancing Authority shall include the applicable elements in Attachment 1-EOP-001-0 when developing an emergency plan.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
EOP-003-1 R2	Each Transmission Operator and Balancing Authority shall establish plans for automatic load shedding for underfrequency or undervoltage conditions.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
EOP-003-1 R3	Each Transmission Operator and Balancing Authority shall coordinate load shedding plans among other interconnected Transmission Operators and Balancing Authorities.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
EOP-003-1 R4	A Transmission Operator or Balancing Authority shall consider one or more of these factors in designing an automatic load shedding scheme: frequency, rate of frequency decay, voltage level, rate of voltage decay, or power flow levels.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
EOP-003-1 R8	Each Transmission Operator or Balancing Authority shall have plans for operator-controlled manual load shedding to respond to real-time emergencies. The Transmission Operator or Balancing Authority shall be capable of implementing the load shedding in a timeframe adequate for responding to the emergency.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
EOP-004-1 R3	A Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load Serving Entity	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
EOP-004-1 R3	<p>experiencing a reportable incident shall provide a preliminary written report to its Regional Reliability Organization and NERC. See NERC Standard for Forms and Table.</p> <p>R3.1 - The affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load Serving Entity shall submit within 24 hours of the disturbance or unusual occurrence either a copy of the report submitted to DOE, or, if no DOE report is required, a copy of the NERC Interconnection Reliability Operating Limit and Preliminary Disturbance Report form. Events that are not identified until some time after they occur shall be reported within 24 hours of being recognized.</p> <p>R3.2 - Applicable reporting forms are provided in Attachments 1- EOP-004 and 2- EOP-004.</p> <p>R3.3 - Under certain adverse conditions, e.g., severe weather, it may not be possible to assess the damage caused by a disturbance and issue a written Interconnection Reliability Operating Limit and Preliminary Disturbance Report within 24 hours. In such cases, the affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load Serving Entity shall promptly notify its Regional Reliability Organization(s) and NERC, and verbally provide as much information as is available at that time. The affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load Serving Entity shall then provide timely, periodic verbal updates until adequate information is available to issue a written Preliminary Disturbance Report.</p> <p>R3.4 - If, in the judgment of the Regional Reliability Organization, after consultation with the Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load Serving Entity in which a disturbance occurred, a final report is required, the affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load Serving Entity shall prepare this report within 60 days. As a minimum, the final report shall have a discussion of the events and its cause, the conclusions reached, and recommendations to prevent</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
EOP-004-1 R3	recurrence of this type of event. The report shall be subject to Regional Reliability Organization approval. See NERC Standard for Forms and Table.	Compliant	
EOP-005-1 R1	Each Transmission Operator shall have a restoration plan to reestablish its electric system in a stable and orderly manner in the event of a partial or total shutdown of its system, including necessary operating instructions and procedures to cover emergency conditions, and the loss of vital telecommunications channels. Each Transmission Operator shall include the applicable elements listed in Attachment 1-EOP-005 in developing a restoration plan. See NERC Standard for Attachment.	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
EOP-005-1 R2	Each Transmission Operator shall review and update its restoration plan at least annually and whenever it makes changes in the power system network, and shall correct deficiencies found during the simulated restoration exercises.	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
EOP-005-1 R3	Each Transmission Operator shall develop restoration plans with a priority of restoring the integrity of the Interconnection.	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
EOP-005-1 R4	Each Transmission Operator shall coordinate its restoration plans with the Generator Owners and Balancing Authorities within its area, its Reliability Coordinator, and neighboring Transmission Operators and Balancing Authorities.	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
EOP-005-1 R5	Each Transmission Operator and Balancing Authority shall periodically test its telecommunication facilities needed to implement the restoration plan.	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
EOP-005-1 R6	Each Transmission Operator and Balancing Authority shall train its operating personnel in the implementation of the restoration plan. Such training shall include simulated exercises, if practicable.	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.

Standard Requirement	Description	Compliant?	Entity Comment
EOP-005-1 R7	Each Transmission Operator and Balancing Authority shall verify the restoration procedure by actual testing or by simulation.	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
EOP-005-1 R9	The Transmission Operator shall document the Cranking Paths, including initial switching requirements, between each blackstart generating unit and the unit(s) to be started and shall provide this documentation for review by the Regional Reliability Organization upon request. Such documentation may include Cranking Path diagrams.	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
EOP-005-1 R10	<p>The Transmission Operator shall demonstrate, through simulation or testing, that the blackstart generating units in its restoration plan can perform their intended functions as required in the regional restoration plan.</p> <p>R10.1 - Transmission Operator shall perform this simulation or testing at least once every five years.</p>	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
EOP-008-0 R1	<p>Each Reliability Coordinator, Transmission Operator and Balancing Authority shall have a plan to continue reliability operations in the event its control center becomes inoperable. The contingency plan must meet the following requirements:</p> <p>R1.1 - The contingency plan shall not rely on data or voice communication from the primary control facility to be viable.</p> <p>R1.2 - The plan shall include procedures and responsibilities for providing basic tie line control and procedures and for maintaining the status of all inter-area schedules, such that there is an hourly accounting of all schedules.</p> <p>R1.3 - The contingency plan must address monitoring and control of critical transmission facilities, generation control, voltage control, time and frequency control, control of critical substation devices, and logging of significant power system events. The plan shall list the critical facilities.</p> <p>R1.4 - The plan shall include procedures and responsibilities for</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
EOP-008-0 R1	<p>maintaining basic voice communication capabilities with other areas.</p> <p>R1.5 - The plan shall include procedures and responsibilities for conducting periodic tests, at least annually, to ensure viability of the plan.</p> <p>R1.6 - The plan shall include procedures and responsibilities for providing annual training to ensure that operating personnel are able to implement the contingency plans.</p> <p>R1.7 - The plan shall be reviewed and updated annually.</p> <p>R1.8 - Interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
EOP-009-0 R2	The Generator Owner or Generator Operator shall provide documentation of the test results of the startup and operation of each blackstart generating unit to the Regional Reliability Organizations and upon request to NERC.	Do Not Own	The Milford facility does not have Blackstart capability.
FAC-001-0 R1	<p>The Transmission Owner shall document, maintain, and publish facility connection requirements to ensure compliance with NERC Reliability Standards and applicable Regional Reliability Organization, subregional, Power Pool, and individual Transmission Owner planning criteria and facility connection requirements. The Transmission Owner's facility connection requirements shall address connection requirements for:</p> <p>R1.1 - Generation facilities</p> <p>R1.2 - Transmission facilities</p> <p>R1.3 - End-user facilities</p>	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
FAC-001-0 R2	<p>The Transmission Owner's facility connection requirements shall address, but are not limited to, the following items:</p> <p>R2.1 - Provide a written summary of its plans to achieve the required system performance as described above throughout the</p>	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.

Standard Requirement	Description	Compliant?	Entity Comment
FAC-001-0 R2	<p>planning horizon:</p> <p>R2.1.1 - Procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems.</p> <p>R2.1.2 - Procedures for notification of new or modified facilities to others (those responsible for the reliability of the interconnected transmission systems) as soon as feasible.</p> <p>R2.1.3 - Voltage level and MW and MVAR capacity or demand at point of connection.</p> <p>R2.1.4 - Breaker duty and surge protection.</p> <p>R2.1.5 - System protection and coordination.</p> <p>R2.1.6 - Metering and telecommunications.</p> <p>R2.1.7 - Grounding and safety issues.</p> <p>R2.1.8 - Insulation and insulation coordination.</p> <p>R2.1.9 - Voltage, Reactive Power, and power factor control.</p> <p>R2.1.10 - Power quality impacts.</p> <p>R2.1.11 - Equipment Ratings.</p> <p>R2.1.12 - Synchronizing of facilities.</p> <p>R2.1.13 - Maintenance coordination.</p> <p>R2.1.14 - Operational issues (abnormal frequency and voltages).</p> <p>R2.1.15 - Inspection requirements for existing or new facilities.</p> <p>R2.1.16 - Communications and procedures during normal and emergency operating conditions.</p>	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
FAC-001-0 R3	The Transmission Owner shall maintain and update its facility	Not Compliant	Milford is working diligently to ensure that it is in full

Standard Requirement	Description	Compliant?	Entity Comment
FAC-001-0 R3	connection requirements as required. The Transmission Owner shall make documentation of these requirements available to the users of the transmission system, the Regional Reliability Organization, and NERC on request (five business days).	Not Compliant	compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
FAC-003-1 R1	<p>The Transmission Owner shall prepare, and keep current, a formal transmission vegetation management program (TVMP). The TVMP shall include the Transmission Owner's objectives, practices, approved procedures, and work specifications (ANSI A300, Tree Care Operations - Tree, Shrub, and Other Woody Plant Maintenance - Standard Practices, while not a requirement of this standard, is considered to be an industry best practice.).</p> <p>R1.1 - The TVMP shall define a schedule for and the type (aerial, ground) of ROW vegetation inspections. This schedule should be flexible enough to adjust for changing conditions. The inspection schedule shall be based on the anticipated growth of vegetation and any other environmental or operational factors that could impact the relationship of vegetation to the Transmission Owner's transmission lines.</p> <p>R1.2 - The Transmission Owner, in the TVMP, shall identify and document clearances between vegetation and any overhead, ungrounded supply conductors, taking into consideration transmission line voltage, the effects of ambient temperature on conductor sag under maximum design loading, and the effects of wind velocities on conductor sway. Specifically, the Transmission Owner shall establish clearances to be achieved at the time of vegetation management work identified herein as Clearance 1, and shall also establish and maintain a set of clearances identified herein as Clearance 2 to prevent flashover between vegetation and overhead ungrounded supply conductors.</p> <p>R1.2.1 - Clearance 1 - The Transmission Owner shall determine and document appropriate clearance distances to be achieved at the time of transmission vegetation management work based upon local conditions and the expected time frame in which the Transmission Owner plans to return for future vegetation management work. Local conditions may include, but are not limited to: operating voltage, appropriate vegetation management</p>	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.

Standard Requirement	Description	Compliant?	Entity Comment
FAC-003-1 R1	<p>techniques, fire risk, reasonably anticipated tree and conductor movement, species types and growth rates, species failure characteristics, local climate and rainfall patterns, line terrain and elevation, location of the vegetation within the span, and worker approach distance requirements. Clearance 1 distances shall be greater than those defined by Clearance 2 below.</p> <p>R1.2.2 - Clearance 2 - The Transmission Owner shall determine and document specific radial clearances to be maintained between vegetation and conductors under all rated electrical operating conditions. These minimum clearance distances are necessary to prevent flashover between vegetation and conductors and will vary due to such factors as altitude and operating voltage. These Transmission Owner-specific minimum clearance distances shall be no less than those set forth in the Institute of Electrical and Electronics Engineers (IEEE) Standard 516-2003 (Guide for Maintenance Methods on Energized Power Lines) and as specified in its Section 4.2.2.3, Minimum Air Insulation Distances without Tools in the Air Gap.</p> <p>R1.2.2.1 - Where transmission system transient overvoltage factors are not known, clearances shall be derived from Table 5, IEEE 516-2003, phase-to-ground distances, with appropriate altitude correction factors applied.</p> <p>R1.2.2.2 - Where transmission system transient overvoltage factors are known, clearances shall be derived from Table 7, IEEE 516-2003, phase-to-phase voltages, with appropriate altitude correction factors applied</p> <p>R1.3 - All personnel directly involved in the design and implementation of the TVMP shall hold appropriate qualifications and training, as defined by the Transmission Owner, to perform their duties.</p> <p>R1.4 - Each Transmission Owner shall develop mitigation measures to achieve sufficient clearances for the protection of the transmission facilities when it identifies locations on the ROW where the Transmission Owner is restricted from attaining the</p>	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.

Standard Requirement	Description	Compliant?	Entity Comment
FAC-003-1 R1	<p>clearances specified in Requirement 1.2.1.</p> <p>R1.5 - Each Transmission Owner shall establish and document a process for the immediate communication of vegetation conditions that present an imminent threat of a transmission line outage. This is so that action (temporary reduction in line rating, switching line out of service, etc.) may be taken until the threat is relieved.</p>	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
FAC-003-1 R2	<p>The Transmission Owner shall create and implement an annual plan for vegetation management work to ensure the reliability of the system. The plan shall describe the methods used, such as manual clearing, mechanical clearing, herbicide treatment, or other actions. The plan should be flexible enough to adjust to changing conditions, taking into consideration anticipated growth of vegetation and all other environmental factors that may have an impact on the reliability of the transmission systems. Adjustments to the plan shall be documented as they occur. The plan should take into consideration the time required to obtain permissions or permits from landowners or regulatory authorities. Each Transmission Owner shall have systems and procedures for documenting and tracking the planned vegetation management work and ensuring that the vegetation management work was completed according to work specifications.</p>	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
FAC-003-1 R3	<p>The Transmission Owner shall report quarterly to its RRO, or the RRO's designee, sustained transmission line outages determined by the Transmission Owner to have been caused by vegetation.</p> <p>R3.1 - Multiple sustained outages on an individual line, if caused by the same vegetation, shall be reported as one outage regardless of the actual number of outages within a 24-hour period.</p> <p>R3.2 - The Transmission Owner is not required to report to the RRO, or the RRO's designee, certain sustained transmission line outages caused by vegetation: (1) Vegetation-related outages that result from vegetation falling into lines from outside the ROW that result from natural disasters shall not be considered reportable (examples of disasters that could create non-</p>	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.

Standard Requirement	Description	Compliant?	Entity Comment
FAC-003-1 R3	<p>reportable outages include, but are not limited to, earthquakes, fires, tornados, hurricanes, landslides, wind shear, major storms as defined either by the Transmission Owner or an applicable regulatory body, ice storms, and floods), and (2) Vegetation-related outages due to human or animal activity shall not be considered reportable (examples of human or animal activity that could cause a non-reportable outage include, but are not limited to, logging, animal severing tree, vehicle contact with tree, arboricultural activities or horticultural or agricultural activities, or removal or digging of vegetation).</p> <p>R3.3 - The outage information provided by the Transmission Owner to the RRO, or the RRO's designee, shall include at a minimum: the name of the circuit(s) outaged, the date, time and duration of the outage; a description of the cause of the outage; other pertinent comments; and any countermeasures taken by the Transmission Owner.</p> <p>R3.4 - An outage shall be categorized as one of the following:</p> <p>R3.4.1 - Category 1 - Grow-ins: Outages caused by vegetation growing into lines from vegetation inside and/or outside of the ROW;</p> <p>R3.4.2 - Category 2 - Fall-ins: Outages caused by vegetation falling into lines from inside the ROW;</p> <p>R3.4.3 - Category 3 - Fall-ins: Outages caused by vegetation falling into lines from outside the ROW.</p>	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
FAC-008-1 R1	<p>The Transmission Owner and Generator Owner shall each document its current methodology used for developing Facility Ratings (Facility Ratings Methodology) of its solely and jointly owned Facilities. The methodology shall include all of the following:</p> <p>R1.1 - A statement that a Facility Rating shall equal the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
FAC-008-1 R1	<p>R1.2 - The method by which the Rating (of major BES equipment that comprises a Facility) is determined.</p> <p>R1.2.1 - The scope of equipment addressed shall include, but not be limited to, generators, transmission conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.</p> <p>R1.2.2 - The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.</p> <p>R1.3 - Consideration of the following:</p> <p>R1.3.1 - Ratings provided by equipment manufacturers.</p> <p>R1.3.2 - Design criteria (e.g., including applicable references to industry Rating practices such as manufacturer's warranty, IEEE, ANSI or other standards).</p> <p>R1.3.3 - Ambient conditions.</p> <p>R1.3.4 - Operating limitations.</p> <p>R1.3.5 - Other assumptions.</p>	Compliant	
FAC-008-1 R2	<p>The Transmission Owner and Generator Owner shall each make its Facility Ratings Methodology available for inspection and technical review by those Reliability Coordinators, Transmission Operators, Transmission Planners, and Planning Authorities that have responsibility for the area in which the associated Facilities are located, within 15 business days of receipt of a request.</p>	Compliant	
FAC-009-1 R1	<p>The Transmission Owner and Generator Owner shall each establish Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings Methodology.</p>	Compliant	
FAC-009-1 R2	<p>The Transmission Owner and Generator Owner shall each provide Facility Ratings for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities to its associated</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
FAC-009-1 R2	Reliability Coordinator(s), Planning Authority(ies), Transmission Planner(s), and Transmission Operator(s) as scheduled by such requesting entities.	Compliant	
FAC-014-2 R2	The Transmission Operator shall establish SOLs (as directed by its Reliability Coordinator) for its portion of the Reliability Coordinator Area that are consistent with its Reliability Coordinator's SOL Methodology.	Compliant	
FAC-014-2 R5	<p>The Reliability Coordinator, Planning Authority and Transmission Planner shall each provide its SOLs and IROLs to those entities that have a reliability-related need for those limits and provide a written request that includes a schedule for delivery of those limits as follows:</p> <p>R5.1 - The Reliability Coordinator shall provide its SOLs (including the subset of SOLs that are IROLs) to adjacent Reliability Coordinators and Reliability Coordinators who indicate a reliability-related need for those limits, and to the Transmission Operators, Transmission Planners, Transmission Service Providers and Planning Authorities within its Reliability Coordinator Area. For each IROL, the Reliability Coordinator shall provide the following supporting information:</p> <p>R5.1.1 - Identification and status of the associated Facility (or group of Facilities) that is (are) critical to the derivation of the IROL.</p> <p>R5.1.2 - The value of the IROL and its associated Tv.</p> <p>R5.1.3 - The associated Contingency(ies).</p> <p>R5.1.4 - The type of limitation represented by the IROL (e.g., voltage collapse, angular stability).</p> <p>R5.2 - The Transmission Operator shall provide any SOLs it developed to its Reliability Coordinator and to the Transmission Service Providers that share its portion of the Reliability Coordinator Area.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
FAC-014-2 R5	<p>R5.3 - The Planning Authority shall provide its SOLs (including the subset of SOLs that are IROLs) to adjacent Planning Authorities, and to Transmission Planners, Transmission Service Providers, Transmission Operators and Reliability Coordinators that work within its Planning Authority Area.</p> <p>R5.4 - The Transmission Planner shall provide its SOLs (including the subset of SOLs that are IROLs) to its Planning Authority, Reliability Coordinators, Transmission Operators, and Transmission Service Providers that work within its Transmission Planning Area and to adjacent Transmission Planners.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
FAC-501-WECC-1 R1	<p>Transmission Owners shall have a TMIP detailing their inspection and maintenance requirements that apply to all transmission facilities necessary for System Operating Limits associated with each of the transmission paths identified in table titled "Major WECC Transfer Paths in the Bulk Electric System." [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]</p> <p>R1.1 - Transmission Owners shall annually review their TMIP and update as required. [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
IRO-STD-006-0 WR1	<p>Curtailment of Contributing Schedules WECC's Unscheduled Flow Mitigation Plan (Plan), which is on file with FERC and has been accepted by FERC (most recently prior to the date hereof on November 20, 2001 in Docket No. ER01-3085-000), [Capitalized terms used in this section, unless separately defined in this standard, shall have the meaning specified in the Plan.] specifies that members [Reliability Standard will apply to all Responsible Entities within the Western Interconnection.] shall comply with requests from (Qualified) Transfer Path Operators to take actions that will reduce unscheduled flow on the Qualified Path in accordance with the table entitled "WECC Unscheduled Flow Procedure Summary of Curtailment Actions," which is located in Attachment 1 of the Plan. Plan Section 11: 11.1 When USF Accommodation, as specified in Section 7, together with coordinated operation of the Qualified Controllable Devices, as specified in Section 9, are insufficient to reduce the Actual Flow on the Qualified Transfer Path to below the Transfer Limit, the</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
IRO-STD-006-0 WR1	<p>Transfer Path Operator shall request curtailments in Schedules that contribute to the USF through the Qualified Transfer Path according to the USF Reduction Procedure. 11.2 Responsible Entities shall comply in a timely manner with a Transfer Path Operator's request for Schedule Curtailments. Plan Attachment 1 Section 9: "h. Upon receipt of a curtailment request, Contributing Schedules which are subject to curtailments will be reduced (or equivalent alternative schedule adjustments will be effected) in accordance with the following procedures: i. Receivers of Contributing Schedules will initiate the requested schedule reductions unless an otherwise agreed upon procedure for schedule reduction achieving the equivalent effect on the Qualified Transfer Path is established by the Receiver and/or the Sender. ii. Responsible Entities may arrange among themselves to make curtailments called for by this USF Reduction Procedure in a manner other than prescribed provided that the arrangements are as effective as the identified schedule curtailment in reducing USF across the Qualified Transfer Path. Responsible Entities may make bilateral arrangements, which will enable a Responsible Entity with schedules on the affected Qualified Transfer Path to make the required curtailments in lieu of making larger curtailments in schedules over other parallel paths. Where alternative schedule adjustments are utilized, it is the Receiver's responsibility to cause schedule adjustments to be effected which provide the same reduction in flow across the Qualified Transfer Path as would have been achieved by the prescribed reduction in the Contributing Schedule. iii. The total amount of requested schedule reduction may be apportioned to the applicable schedules at the discretion of the Receiver subject to item iv below. iv. Irrespective of the schedules altered or the manner in which they are altered, each Responsible Entity's overall net reduction in Actual Flow across the constrained Qualified Transfer Path must be equivalent to or greater than the reduction which would have been achieved had the identified schedule reduction occurred as requested. v. System dispatchers or real-time schedulers should identify in advance those schedules that qualify for curtailment requests for all Qualified Transfer Paths. This will expedite implementation of this USF Reduction Procedure when requested. vi. While this USF Reduction</p>	Not Applicable	<p>A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.</p>

Standard Requirement	Description	Compliant?	Entity Comment
IRO-STD-006-0 WR1	<p>Procedure does not expect receivers to curtail schedules which would result in loss of firm load, nothing in this USF Reduction Procedure shall relieve the receiver of the obligation to achieve the required reduction in USF across the constrained Qualified Transfer Path." Contributing Schedule curtailments apply to schedules in place before initiation of the USF Procedure at Step 4 (First level Contributing Schedule Curtailment) or higher step. At the time a Step 4 Level 1 USF Action or higher step is initiated, Schedules are established by the existence of an "Implemented" NERC Transaction Tag. Restricted Transactions After the USF Event is declared, a transaction with greater than a 5% Transfer Distribution Factor (TDF) on the Qualified Path in the qualified direction will be considered a "Restricted Transaction." Changes to Restricted Transactions, other than the specific curtailments used to comply with relief obligations, cannot be made unless some alternative action is taken to compensate for the full impact on the Qualified Path. This applies to: New transaction, and Extensions or Adjustments to existing transaction." If two or more Qualified Paths become simultaneously constrained to the point where the curtailment of contributing schedules is necessary, schedule curtailments which relieve USF on one path but increase USF on any other curtailed path shall not be made, unless specific procedures or methods are provided to address this condition. The entity shall be compliant with this standard although the required curtailments were not made.</p>	Not Applicable	<p>A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.</p>
IRO-004-2 R1	<p>Each Transmission Operator, Balancing Authority, and Transmission Service Provider shall comply with the directives of its Reliability Coordinator based on the next day assessments in the same manner in which it would comply during real time operating events.</p>	Compliant	
IRO-005-2 R8	<p>Each Reliability Coordinator shall monitor system frequency and its Balancing Authorities' performance and direct any necessary rebalancing to return to CPS and DCS compliance. The Transmission Operators and Balancing Authorities shall utilize all resources, including firm load shedding, as directed by its Reliability Coordinator to relieve the emergent condition.</p>	Not Applicable	<p>A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.</p>
IRO-005-2 R12	<p>Whenever a Special Protection System that may have an inter-Balancing Authority, or inter-Transmission Operator impact (e.g.,</p>	Not Applicable	<p>A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC,</p>

Standard Requirement	Description	Compliant?	Entity Comment
IRO-005-2 R12	could potentially affect transmission flows resulting in a SOL or IROL violation) is armed, the Reliability Coordinators shall be aware of the impact of the operation of that Special Protection System on inter-area flows. The Transmission Operator shall immediately inform the Reliability Coordinator of the status of the Special Protection System including any degradation or potential failure to operate as expected.	Not Applicable	NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
IRO-005-2 R13	Each Reliability Coordinator shall ensure that all Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities operate to prevent the likelihood that a disturbance, action, or non-action in its Reliability Coordinator Area will result in a SOL or IROL violation in another area of the Interconnection. In instances where there is a difference in derived limits, the Reliability Coordinator and its Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall always operate the Bulk Electric System to the most limiting parameter.	Compliant	
IRO-005-2a R8	Each Reliability Coordinator shall monitor system frequency and its Balancing Authorities' performance and direct any necessary rebalancing to return to CPS and DCS compliance. The Transmission Operators and Balancing Authorities shall utilize all resources, including firm load shedding, as directed by its Reliability Coordinator to relieve the emergent condition.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
IRO-005-2a R12	Whenever a Special Protection System that may have an inter-Balancing Authority, or inter-Transmission Operator impact (e.g., could potentially affect transmission flows resulting in a SOL or IROL violation) is armed, the Reliability Coordinators shall be aware of the impact of the operation of that Special Protection System on inter-area flows. The Transmission Operator shall immediately inform the Reliability Coordinator of the status of the Special Protection System including any degradation or potential failure to operate as expected.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
IRO-005-2a R13	Each Reliability Coordinator shall ensure that all Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities operate to prevent the likelihood that a	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
IRO-005-2a R13	disturbance, action, or non-action in its Reliability Coordinator Area will result in a SOL or IROL violation in another area of the Interconnection. In instances where there is a difference in derived limits, the Reliability Coordinator and its Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall always operate the Bulk Electric System to the most limiting parameter.	Compliant	
IRO-005-3a R5	Each Reliability Coordinator shall monitor system frequency and its Balancing Authorities' performance and direct any necessary rebalancing to return to CPS and DCS compliance. The Transmission Operators and Balancing Authorities shall utilize all resources, including firm load shedding, as directed by its Reliability Coordinator to relieve the emergent condition.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
IRO-005-3a R9	Whenever a Special Protection System that may have an inter-Balancing Authority, or inter-Transmission Operator impact (e.g., could potentially affect transmission flows resulting in a SOL or IROL violation) is armed, the Reliability Coordinators shall be aware of the impact of the operation of that Special Protection System on inter-area flows. The Transmission Operator shall immediately inform the Reliability Coordinator of the status of the Special Protection System including any degradation or potential failure to operate as expected.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
IRO-005-3a R10	In instances where there is a difference in derived limits, the Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall always operate the Bulk Electric System to the most limiting parameter.	Compliant	
MOD-001-1a R1	Each Transmission Operator shall select one of the methodologies listed below for calculating Available Transfer Capability (ATC) or Available Flowgate Capability (AFC) for each ATC Path per time period identified in R2 for those Facilities within its Transmission operating area: *The Area Interchange Methodology, as described in MOD-028 *The Rated System Path Methodology, as described in MOD-029 *The Flowgate Methodology, as described in MOD-030	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-001-1a R6	When calculating Total Transfer Capability (TTC) or Total Flowgate Capability (TFC) the Transmission Operator shall use	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC,

Standard Requirement	Description	Compliant?	Entity Comment
MOD-001-1a R6	assumptions no more limiting than those used in the planning of operations for the corresponding time period studied, providing such planning of operations has been performed for that time period.	Not Applicable	NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-008-1 R1	<p>Each Transmission Operator shall prepare and keep current a TRM Implementation Document (TRMID) that includes, as a minimum, the following information: [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]</p> <p>R1.1 - Identification of (on each of its respective ATC Paths or Flowgates) each of the following components of uncertainty if used in establishing TRM, and a description of how that component is used to establish a TRM value: - Aggregate Load forecast. - Load distribution uncertainty. - Forecast uncertainty in Transmission system topology (including, but not limited to, forced or unplanned outages and maintenance outages). - Allowances for parallel path (loop flow) impacts. - Allowances for simultaneous path interactions. - Variations in generation dispatch (including, but not limited to, forced or unplanned outages, maintenance outages and location of future generation). - Short-term System Operator response (Operating Reserve actions). - Reserve sharing requirements. - Inertial response and frequency bias.</p> <p>R1.2 - The description of the method used to allocate TRM across ATC Paths or Flowgates.</p> <p>R1.3 - The identification of the TRM calculation used for the following time periods:</p> <p>R1.3.1 - Same day and real-time.</p> <p>R1.3.2 - Day-ahead and pre-schedule.</p> <p>R1.3.3 - Beyond day-ahead and pre-schedule, up to thirteen months ahead.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-008-1 R2	Each Transmission Operator shall only use the components of uncertainty from R1.1 to establish TRM, and shall not include any	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC,

Standard Requirement	Description	Compliant?	Entity Comment
MOD-008-1 R2	of the components of Capacity Benefit Margin (CBM). Transmission capacity set aside for reserve sharing agreements can be included in TRM. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]	Not Applicable	NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-008-1 R3	Each Transmission Operator shall make available its TRMID, and if requested, underlying documentation (if any) used to determine TRM, in the format used by the Transmission Operator, to any of the following who make a written request no more than 30 calendar days after receiving the request. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning] - Transmission Service Providers - Reliability Coordinators - Planning Coordinators - Transmission Planner - Transmission Operators	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-008-1 R4	Each Transmission Operator that maintains TRM shall establish TRM values in accordance with the TRMID at least once every 13 months. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-008-1 R5	The Transmission Operator that maintains TRM shall provide the TRM values to its Transmission Service Provider(s) and Transmission Planner(s) no more than seven calendar days after a TRM value is initially established or subsequently changed. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-010-0 R2	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).	Compliant	
MOD-012-0 R2	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	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
MOD-012-0 R2	these entities shall provide data on request (30 calendar days).	Compliant	
MOD-028-1 R2	<p>When calculating TTC for ATC Paths, the Transmission Operator shall use a Transmission model that contains all of the following: [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]</p> <p>R2.1 - Modeling data and topology of its Reliability Coordinator's area of responsibility. Equivalent representation of radial lines and facilities 161 kV or below is allowed.</p> <p>R2.2 - Modeling data and topology (or equivalent representation) for immediately adjacent and beyond Reliability Coordination areas.</p> <p>R2.3 - Facility Ratings specified by the Generator Owners and Transmission Owners.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-028-1 R3	<p>When calculating TTCs for ATC Paths, the Transmission Operator shall include the following data for the Transmission Service Provider's area. The Transmission Operator shall also include the following data associated with Facilities that are explicitly represented in the Transmission model, as provided by adjacent Transmission Service Providers and any other Transmission Service Providers with which coordination agreements have been executed: [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]</p> <p>R3.1 - For on-peak and off-peak intra-day and next-day TTCs, use the following (as well as any other values and additional parameters as specified in the ATCID):</p> <p>R3.1.1 - Expected generation and Transmission outages, additions, and retirements, included as specified in the ATCID.</p> <p>R3.1.2 - Load forecast for the applicable period being calculated.</p> <p>R3.1.3 - Unit commitment and dispatch order, to include all designated network resources and other resources that are committed or have the legal obligation to run, (within or out of</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
MOD-028-1 R3	<p>economic dispatch) as they are expected to run.</p> <p>R3.2 - For days two through 31 TTCs and for months two through 13 TTCs, use the following (as well as any other values and internal parameters as specified in the ATCID):</p> <p>R3.2.1 - Expected generation and Transmission outages, additions, and Retirements, included as specified in the ATCID.</p> <p>R3.2.2 - Daily load forecast for the days two through 31 TTCs being calculated and monthly forecast for months two through 13 months TTCs being calculated.</p> <p>R3.2.3 - Unit commitment and dispatch order, to include all designated network resources and other resources that are committed or have the legal obligation to run, (within or out of economic dispatch) as they are expected to run.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-028-1 R4	<p>When calculating TTCs for ATC Paths, the Transmission Operator shall meet all of the following conditions: [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]</p> <p>R4.1 - Use all Contingencies meeting the criteria described in the ATCID.</p> <p>R4.2 - Respect any contractual allocations of TTC.</p> <p>R4.3 - Include, for each time period, the Firm Transmission Service expected to be scheduled as specified in the ATCID (filtered to reduce or eliminate duplicate impacts from transactions using Transmission service from multiple Transmission Service Providers) for the Transmission Service Provider, all adjacent Transmission Service Providers, and any Transmission Service Providers with which coordination agreements have been executed modeling the source and sink as follows: - If the source, as specified in the ATCID, has been identified in the reservation and it is discretely modeled in the Transmission Service Provider's Transmission model, use the discretely modeled point as the source. - If the source, as specified in the ATCID, has been identified in the reservation and the point can be mapped to an</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
MOD-028-1 R4	<p>"equivalence" or "aggregate representation" in the Transmission Service Provider's Transmission model, use the modeled equivalence or aggregate as the source. - If the source, as specified in the ATCID, has been identified in the reservation and the point cannot be mapped to a discretely modeled point, an "equivalence," or an "aggregate representation" in the Transmission Service Provider's Transmission model, use the immediately adjacent Balancing Authority associated with the Transmission Service Provider from which the power is to be received as the source. - If the source, as specified in the ATCID, has not been identified in the reservation, use the immediately adjacent Balancing Authority associated with the Transmission Service Provider from which the power is to be received as the source. - If the sink, as specified in the ATCID, has been identified in the reservation and it is discretely modeled in the Transmission Service Provider's Transmission model, use the discretely modeled point shall as the sink. - If the sink, as specified in the ATCID, has been identified in the reservation and the point can be mapped to an "equivalence" or "aggregate representation" in the Transmission Service Provider's Transmission model, use the modeled equivalence or aggregate as the sink. - If the sink, as specified in the ATCID, has been identified in the reservation and the point can not be mapped to a discretely modeled point, an "equivalence," or an "aggregate representation" in the Transmission Service Provider's Transmission model, use the immediately adjacent Balancing Authority associated with the Transmission Service Provider to which the power is to be delivered as the sink. - If the sink, as specified in the ATCID, has not been identified in the reservation, use the immediately adjacent Balancing Authority associated with the Transmission Service Provider to which the power is being delivered as the sink.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-028-1 R5	<p>Each Transmission Operator shall establish TTC for each ATC Path as defined below: [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]</p> <p>R5.1 - At least once within the seven calendar days prior to the specified period for TTCs used in hourly and daily ATC calculations.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
MOD-028-1 R5	<p>R5.2 - At least once per calendar month for TTCs used in monthly ATC calculations.</p> <p>R5.3 - Within 24 hours of the unexpected outage of a 500 kV or higher transmission Facility or a transformer with a low-side voltage of 200 kV or higher for TTCs in effect during the anticipated duration of the outage, provided such outage is expected to last 24 hours or longer.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-028-1 R6	<p>Each Transmission Operator shall establish TTC for each ATC Path using the following process: [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]</p> <p>R6.1 - Determine the incremental Transfer Capability for each ATC Path by increasing generation and/or decreasing load within the source Balancing Authority area and decreasing generation and/or increasing load within the sink Balancing Authority area until either: - A System Operating Limit is reached on the Transmission Service Provider's system, or - A SOL is reached on any other adjacent system in the Transmission model that is not on the study path and the distribution factor is 5% or greater [The Transmission operator may honor distribution factors less than 5% if desired.]</p> <p>R6.2 - If the limit in step R6.1 can not be reached by adjusting any combination of load or generation, then set the incremental Transfer Capability by the results of the case where the maximum adjustments were applied.</p> <p>R6.3 - Use (as the TTC) the lesser of: - The sum of the incremental Transfer Capability and the impacts of Firm Transmission Services, as specified in the Transmission Service Provider's ATCID, that were included in the study model, or - The sum of Facility Ratings of all ties comprising the ATC Path.</p> <p>R6.4 - For ATC Paths whose capacity uses jointly-owned or allocated Facilities, limit TTC for each Transmission Service Provider so the TTC does not exceed each Transmission Service Provider's contractual rights.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
MOD-028-1 R7	<p>The Transmission Operator shall provide the Transmission Service Provider of that ATC Path with the most current value for TTC for that ATC Path no more than: [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]</p> <p>R7.1 - One calendar day after its determination for TTCs used in hourly and daily ATC calculations.</p> <p>R7.2 - Seven calendar days after its determination for TTCs used in monthly ATC calculations.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-029-1a R1	<p>When calculating TTCs for ATC Paths, the Transmission Operator shall use a Transmission model which satisfies the following requirements:</p> <p>R1.1 - The model utilizes data and assumptions consistent with the time period being studied and that meets the following criteria:</p> <p>R1.1.1 - Includes at least:</p> <p>R1.1.1.1 - The Transmission Operator area. Equivalent representation of radial lines and facilities 161kV or below is allowed.</p> <p>R1.1.1.2 - All Transmission Operator areas contiguous with its own Transmission Operator area. (Equivalent representation is allowed.)</p> <p>R1.1.2 - Models all system Elements as in-service for the assumed initial conditions.</p> <p>R1.1.3 - Models all generation (may be either a single generator or multiple generators) that is greater than 20 MVA at the point of interconnection in the studied area.</p> <p>R1.1.4 - Models phase shifters in non-regulating mode, unless otherwise specified in the Available Transfer Capability Implementation Document (ATCID).</p> <p>R1.1.5 - Uses Load forecast by Balancing Authority.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
MOD-029-1a R1	<p>R1.1.6 - Uses Transmission Facility additions and retirements.</p> <p>R1.1.7 - Uses Generation Facility additions and retirements.</p> <p>R1.1.8 - Uses Special Protection System (SPS) models where currently existing or projected for implementation within the studied time horizon.</p> <p>R1.1.9 - Models series compensation for each line at the expected operating level unless specified otherwise in the ATCID.</p> <p>R1.1.10 - Includes any other modeling requirements or criteria specified in the ATCID.</p> <p>R1.2 - Uses Facility Ratings as provided by the Transmission Owner and Generator Owner</p> <p>R1.1.1.3 - Any other Transmission Operator area linked to the Transmission Operator's area by joint operating agreement. (Equivalent representation is allowed.)</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-029-1a R2	<p>The Transmission Operator shall use the following process to determine TTC:</p> <p>R2.1 - Except where otherwise specified within MOD-029-1, adjust base case generation and Load levels within the updated power flow model to determine the TTC (maximum flow or reliability limit) that can be simulated on the ATC Path while at the same time satisfying all planning criteria contingencies as follows:</p> <p>R2.1.1 - When modeling normal conditions, all Transmission Elements will be modeled at or below 100% of their continuous rating.</p> <p>R2.1.2 - When modeling contingencies the system shall demonstrate transient, dynamic and voltage stability, with no Transmission Element modeled above its Emergency Rating.</p> <p>R2.1.3 - Uncontrolled separation shall not occur.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
MOD-029-1a R2	<p>R2.2 - Where it is impossible to actually simulate a reliability-limited flow in a direction counter to prevailing flows (on an alternating current Transmission line), set the TTC for the non-prevailing direction equal to the TTC in the prevailing direction. If the TTC in the prevailing flow direction is dependant on a Special Protection System (SPS), set the TTC for the non-prevailing flow direction equal to the greater of the maximum flow that can be simulated in the non-prevailing flow direction or the maximum TTC that can be achieved in the prevailing flow direction without use of a SPS.</p> <p>R2.3 - For an ATC Path whose capacity is limited by contract, set TTC on the ATC Path at the lesser of the maximum allowable contract capacity or the reliability limit as determined by R2.1.</p> <p>R2.4 - For an ATC Path whose TTC varies due to simultaneous interaction with one or more other paths, develop a nomogram describing the interaction of the paths and the resulting TTC under specified conditions.</p> <p>R2.5 - The Transmission Operator shall identify when the TTC for the ATC Path being studied has an adverse impact on the TTC value of any existing path. Do this by modeling the flow on the path being studied at its proposed new TTC level simultaneous with the flow on the existing path at its TTC level while at the same time honoring the reliability criteria outlined in R2.1. The Transmission Operator shall include the resolution of this adverse impact in its study report for the ATC Path.</p> <p>R2.6 - Where multiple ownership of Transmission rights exists on an ATC Path, allocate TTC of that ATC Path in accordance with the contractual agreement made by the multiple owners of that ATC Path.</p> <p>R2.7 - For ATC Paths whose path rating, adjusted for seasonal variance, was established, known and used in operation since January 1, 1994, and no action has been taken to have the path rated using a different method, set the TTC at that previously</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
MOD-029-1a R2	<p>established amount.</p> <p>R2.8 - Create a study report that describes the steps above that were undertaken (R2.1 – R2.7), including the contingencies and assumptions used, when determining the TTC and the results of the study. Where three phase fault damping is used to determine stability limits, that report shall also identify the percent used and include justification for use unless specified otherwise in the ATCID.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-029-1a R3	Each Transmission Operator shall establish the TTC at the lesser of the value calculated in R2 or any System Operating Limit (SOL) for that ATC Path.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-029-1a R4	Within seven calendar days of the finalization of the study report, the Transmission Operator shall make available to the Transmission Service Provider of the ATC Path, the most current value for TTC and the TTC study report documenting the assumptions used and steps taken in determining the current value for TTC for that ATC Path.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-030-2 R2	<p>The Transmission Operator shall perform the following: [Violation Risk Factor: To Be Determined] [Time Horizon: Operations Planning]</p> <p>R2.1 - Include Flowgates used in the AFC process based, at a minimum, on the following criteria:</p> <p>R2.1.1 - Results of a first Contingency transfer analysis for ATC Paths internal to a Transmission Operator's system up to the path capability such that at a minimum the first three limiting Elements and their worst associated Contingency combinations with an OTDF of at least 5% and within the Transmission Operator's system are included as Flowgates.</p> <p>R2.1.1.1 - Use first Contingency criteria consistent with those first Contingency criteria used in planning of operations for the applicable time periods, including use of Special Protection Systems.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
MOD-030-2 R2	<p>R2.1.1.2 - Only the most limiting element in a series configuration needs to be included as a Flowgate.</p> <p>R2.1.1.3 - If any limiting element is kept within its limit for its associated worst Contingency by operating within the limits of another Flowgate, then no new Flowgate needs to be established for such limiting elements or Contingencies.</p> <p>R2.1.2 - Results of a first Contingency transfer analysis from all adjacent Balancing Authority source and sink (as defined in the ATCID) combinations up to the path capability such that at a minimum the first three limiting Elements and their worst associated Contingency combinations with an Outage Transfer Distribution Factor (OTDF) of at least 5% and within the Transmission Operator's system are included as Flowgates unless the interface between such adjacent Balancing Authorities is accounted for using another ATC methodology.</p> <p>R2.1.2.1 - Use first Contingency criteria consistent with those first Contingency criteria used in planning of operations for the applicable time periods, including use of Special Protection Systems.</p> <p>R2.1.2.2 - Only the most limiting element in a series configuration needs to be included as a Flowgate.</p> <p>R2.1.2.3 - If any limiting element is kept within its limit for its associated worst Contingency by operating within the limits of another Flowgate, then no new Flowgate needs to be established for such limiting elements or Contingencies.</p> <p>R2.1.3 - Any limiting Element/Contingency combination at least within its Reliability Coordinator's Area that has been subjected to an Interconnection-wide congestion management procedure within the last 12 months, unless the limiting Element/Contingency combination is accounted for using another ATC methodology or was created to address temporary operating conditions.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
MOD-030-2 R2	<p>R2.1.4 - Any limiting Element/Contingency combination within the Transmission model that has been requested to be included by any other Transmission Service Provider using the Flowgate Methodology or Area Interchange Methodology, where:</p> <p>R2.1.4.1 - The coordination of the limiting Element/Contingency combination is not already addressed through a different methodology, and - Any generator within the Transmission Service Provider's area has at least a 5% Power Transfer Distribution Factor (PTDF) or Outage Transfer Distribution Factor (OTDF) impact on the Flowgate when delivered to the aggregate load of its own area, or - A transfer from any Balancing Area within the Transmission Service Provider's area to a Balancing Area adjacent has at least a 5% PTDF or OTDF impact on the Flowgate. - The Transmission Operator may utilize distribution factors less than 5% if desired.</p> <p>R2.1.4.2 - The limiting Element/Contingency combination is included in the requesting Transmission Service Provider's methodology.</p> <p>R2.2 - At a minimum, establish a list of Flowgates by creating, modifying, or deleting Flowgate definitions at least once per calendar year.</p> <p>R2.3 - At a minimum, establish a list of Flowgates by creating, modifying, or deleting Flowgates that have been requested as part of R2.1.4 within thirty calendar days from the request.</p> <p>R2.4 - Establish the TFC of each of the defined Flowgates as equal to: - For thermal limits, the System Operating Limit (SOL) of the Flowgate. - For voltage or stability limits, the flow that will respect the SOL of the Flowgate.</p> <p>R2.5 - At a minimum, establish the TFC once per calendar year.</p> <p>R2.5.1 - If notified of a change in the Rating by the Transmission Owner that would affect the TFC of a flowgate used in the AFC</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
MOD-030-2 R2	<p>process, the TFC should be updated within seven calendar days of the notification.</p> <p>R2.6 - Provide the Transmission Service Provider with the TFCs within seven calendar days of their establishment.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
MOD-030-2 R3	<p>The Transmission Operator shall make available to the Transmission Service Provider a Transmission model to determine Available Flowgate Capability (AFC) that meets the following criteria: [Violation Risk Factor: To Be Determined] [Time Horizon: Operations Planning]</p> <p>R3.1 - Contains generation Facility Ratings, such as generation maximum and minimum output levels, specified by the Generator Owners of the Facilities within the model.</p> <p>R3.2 - Updated at least once per day for AFC calculations for intra-day, next day, and days two through 30.</p> <p>R3.3 - Updated at least once per month for AFC calculations for months two through 13.</p> <p>R3.4 - Contains modeling data and system topology for the Facilities within its Reliability Coordinator's Area. Equivalent representation of radial lines and Facilities 161kV or below is allowed.</p> <p>R3.5 - Contains modeling data and system topology (or equivalent representation) for immediately adjacent and beyond Reliability Coordination Areas.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
NUC-001-2 R2	The Nuclear Plant Generator Operator and the applicable Transmission Entities shall have in effect one or more Agreements [Agreements may include mutually agreed upon procedures or protocols in effect between entities or between departments of a vertically integrated system.] that include mutually agreed to NPIRs and document how the Nuclear Plant Generator Operator and the applicable Transmission Entities shall address and implement these NPIRs. [Risk Factor: Medium]	Do Not Own	Milford does not own or operate any nuclear facilities.
NUC-001-2 R3	Per the Agreements developed in accordance with this standard,	Do Not Own	Milford does not own or operate any nuclear facilities.

Standard Requirement	Description	Compliant?	Entity Comment
NUC-001-2 R3	the applicable Transmission Entities shall incorporate the NPIRs into their planning analyses of the electric system and shall communicate the results of these analyses to the Nuclear Plant Generator Operator. [Risk Factor: Medium]	Do Not Own	Milford does not own or operate any nuclear facilities.
NUC-001-2 R4	Per the Agreements developed in accordance with this standard, the applicable Transmission Entities shall: [Risk Factor: High] R4.1 - Incorporate the NPIRs into their operating analyses of the electric system. R4.2 - Operate the electric system to meet the NPIRs. R4.3 - Inform the Nuclear Plant Generator Operator when the ability to assess the operation of the electric system affecting NPIRs is lost.	Do Not Own	Milford does not own or operate any nuclear facilities.
NUC-001-2 R5	The Nuclear Plant Generator Operator shall operate per the Agreements developed in accordance with this standard. [Risk Factor: High]	Do Not Own	Milford does not own or operate any nuclear facilities.
NUC-001-2 R6	Per the Agreements developed in accordance with this standard, the applicable Transmission Entities and the Nuclear Plant Generator Operator shall coordinate outages and maintenance activities which affect the NPIRs. [Risk Factor: Medium]	Do Not Own	Milford does not own or operate any nuclear facilities.
NUC-001-2 R8	Per the Agreements developed in accordance with this standard, the applicable Transmission Entities shall inform the Nuclear Plant Generator Operator of actual or proposed changes to electric system design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs. [Risk Factor: High]	Do Not Own	Milford does not own or operate any nuclear facilities.
NUC-001-2 R9	The Nuclear Plant Generator Operator and the applicable Transmission Entities shall include, as a minimum, the following elements within the agreement(s) identified in R2: [Risk Factor: Medium] R9.1 - Administrative elements: R9.1.1 - Definitions of key terms used in the agreement. R9.1.2 - Names of the responsible entities, organizational	Do Not Own	Milford does not own or operate any nuclear facilities.

Standard Requirement	Description	Compliant?	Entity Comment
NUC-001-2 R9	<p>relationships, and responsibilities related to the NPIRs.</p> <p>R9.1.3 - A requirement to review the agreement(s) at least every three years.</p> <p>R9.1.4 - A dispute resolution mechanism.</p> <p>R9.2 - Technical requirements and analysis:</p> <p>R9.2.1 - Identification of parameters, limits, configurations, and operating scenarios included in the NPIRs and, as applicable, procedures for providing any specific data not provided within the agreement.</p> <p>R9.2.2 - Identification of facilities, components, and configuration restrictions that are essential for meeting the NPIRs.</p> <p>R9.2.3 - Types of planning and operational analyses performed specifically to support the NPIRs, including the frequency of studies and types of Contingencies and scenarios required.</p> <p>R9.3 - Operations and maintenance coordination:</p> <p>R9.3.1 - Designation of ownership of electrical facilities at the interface between the electric system and the nuclear plant and responsibilities for operational control coordination and maintenance of these facilities.</p> <p>R9.3.2 - Identification of any maintenance requirements for equipment not owned or controlled by the Nuclear Plant Generator Operator that are necessary to meet the NPIRs.</p> <p>R9.3.3 - Coordination of testing, calibration and maintenance of on-site and off-site power supply systems and related components.</p> <p>R9.3.4 - Provisions to address mitigating actions needed to avoid violating NPIRs and to address periods when responsible Transmission Entity loses the ability to assess the capability of</p>	Do Not Own	Milford does not own or operate any nuclear facilities.

Standard Requirement	Description	Compliant?	Entity Comment
NUC-001-2 R9	<p>the electric system to meet the NPIRs. These provisions shall include responsibility to notify the Nuclear Plant Generator Operator within a specified time frame.</p> <p>R9.3.5 - Provision for considering, within the restoration process, the requirements and urgency of a nuclear plant that has lost all off-site and on-site AC power.</p> <p>R9.3.6 - Coordination of physical and cyber security protection of the Bulk Electric System at the nuclear plant interface to ensure each asset is covered under at least one entity's plan.</p> <p>R9.3.7 - Coordination of the NPIRs with transmission system Special Protection Systems and underfrequency and undervoltage load shedding programs.</p> <p>R9.4 - Communications and training:</p> <p>R9.4.1 - Provisions for communications between the Nuclear Plant Generator Operator and Transmission Entities, including communications protocols, notification time requirements, and definitions of term</p> <p>R9.4.2 - Provisions for coordination during an off-normal or emergency event affecting the NPIRs, including the need to provide timely information explaining the event, an estimate of when the system will be returned to a normal state, and the actual time the system is returned to normal.</p> <p>R9.4.3 - Provisions for coordinating investigations of causes of unplanned events affecting the NPIRs and developing solutions to minimize future risk of such events.</p> <p>R9.4.4 - Provisions for supplying information necessary to report to government agencies, as related to NPIRs.</p> <p>R9.4.5 - Provisions for personnel training, as related to NPIRs.</p>	Do Not Own	Milford does not own or operate any nuclear facilities.
PER-001-0.1 R1	Each Transmission Operator and Balancing Authority shall provide operating personnel with the responsibility and authority	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC,

Standard Requirement	Description	Compliant?	Entity Comment
PER-001-0.1 R1	to implement real-time actions to ensure the stable and reliable operation of the Bulk Electric System.	Not Applicable	NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
PER-002-0 R1	Each Transmission Operator and Balancing Authority shall be staffed with adequately trained operating personnel.	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
PER-002-0 R2	<p>Each Transmission Operator and Balancing Authority shall have a training program for all operating personnel that are in:</p> <p>R2.1 - Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.</p> <p>R2.2 - Positions directly responsible for complying with NERC standards.</p>	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
PER-002-0 R3	<p>For personnel identified in Requirement R2, the Transmission Operator and Balancing Authority shall provide a training program meeting the following criteria</p> <p>R3.1 - A set of training program objectives must be defined, based on NERC and Regional Reliability Organization standards, entity operating procedures, and applicable regulatory requirements. These objectives shall reference the knowledge and competencies needed to apply those standards, procedures, and requirements to normal, emergency, and restoration conditions for the Transmission Operator and Balancing Authority operating positions</p> <p>R3.2 - The training program must include a plan for the initial and continuing training of Transmission Operator and Balancing Authority operating personnel. That plan shall address knowledge and competencies required for reliable system operations.</p> <p>R3.3 - The training program must include training time for all Transmission Operator and Balancing Authority operating personnel to ensure their operating proficiency</p>	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.

Standard Requirement	Description	Compliant?	Entity Comment
PER-002-0 R3	R3.4 - Training staff must be identified, and the staff must be competent in both knowledge of system operations and instructional capabilities.	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
PER-002-0 R4	For personnel identified in Requirement R2, each Transmission Operator and Balancing Authority shall provide its operating personnel at least five days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
PER-003-0 R1	<p>Each Transmission Operator, Balancing Authority, and Reliability Coordinator shall staff all operating positions that meet both of the following criteria with personnel that are NERC-certified for the applicable functions:</p> <p>R1.1 - Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.</p> <p>R1.2 - Positions directly responsible for complying with NERC standards.</p>	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
PRC-STD-001-1 WR1	WR1 Each Transmission Operator or Transmission Owner identified in Section 4.1 must submit documentation that an officer of the organization certifies that: a. All protective relay applications are appropriate for the Bulk Power Transmission Paths ("BPTP") identified in Attachment A - Table 2 of this Standard pursuant to applicable WECC Standards and NERC Standards; b. The BPTP protective relay settings and logic are appropriate pursuant to applicable WECC Standards and NERC Standards; c. Since the last certification or for the last three years all network changes in the path, at the terminals of the path, or in nearby facilities that affect operation of the path have been considered in the protective relay application and settings; d. All relay operations since the last certification or during the last three-year period have been analyzed for correctness and appropriate corrective action taken pursuant to applicable WECC Standards and NERC Standards; e. Up-to-date relay information has been provided to the on-shift operating personnel and the appropriate	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
PRC-STD-001-1 WR1	Reliability Coordinator. Note: If a path operator cannot submit certification on behalf of the multiple owners of a path for Protective Relay Application and Settings because the authority for certification resides with one or more path owners, then the path owner(s) shall submit the certification. The path operator shall notify the path owner(s) and WECC in writing that the path owner(s) is (are) to submit the certification. (Source: WECC Criterion)	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
PRC-STD-003-1 WR1	WR1. Owners of protective relays and Remedial Action Schemes (RAS) applied to path elements of selected WECC major transmission path facilities (listed in Attachment A "C Table 2) and RAS (listed in Attachment B "C Table 3) must take the following action for each known or probable relay misoperation: a. If functionally equivalent protective relaying or RAS remains in service to ensure bulk transmission system reliability; the relay or RAS that misoperated is to be removed from service for repair or modification within 22 hours of the relay or RAS misoperation. The relay or RAS shall be replaced, repaired, or modified such that the incorrect operation will not be repeated. b. If functionally equivalent protective relaying or RAS does not remain in service that will ensure bulk transmission system reliability, and the relay or RAS that misoperated cannot be repaired and placed back in service within 22 hours, the associated transmission path facility must be removed from service. The remaining path facilities, if any, must be de-rated to a reliable operating level. c. If the relay or RAS misoperates and there is some protection but not entirely functionally equivalent, the relay or RAS must be repaired or removed from service within 22 hours. The associated transmission may remain in service; however, system operation must fully comply with WECC and NERC operating standards. This may require an adjustment of operating levels. d. Protective relays or RAS removed from service must be repaired or replaced with functionally equivalent protective relays or RAS within 20 Business Days of removal, or the system shall be operated at levels that meet WECC Standards and NERC Standards or the associated transmission path elements shall be removed from service. It is not intended that the above requirements apply to system protection and/or RAS actions that appear to be entirely reasonable and correct at the time of occurrence and associated	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
PRC-STD-003-1 WR1	system performance is fully compliant with WECC and NERC standards, and the protective relaying or RAS operation is later found to be incorrect. In such cases, upon determination of the incorrect operation, the requirements of (a) through (d) above will become applicable at the time the incorrect operation is identified. (Source: WECC Criterion)	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
PRC-STD-005-1 WR1	WR1. All bulk power transmission elements (i.e. lines, stations and rights of way) included as part of the transmission facilities (or required to maintain transfer capability) impacting each of the transmission paths listed in Attachment A - WECC Table 2 shall be inspected and maintained in accordance with this criterion, taking into consideration diverse environmental and climatic conditions, terrain, equipment, maintenance philosophies, and design practices. a. General This Transmission Maintenance Standard requires each Responsible Entity identified in Section A.4.1 to develop and implement a Transmission Maintenance and Inspection Plan (TMIP) detailing the Responsible Entity's inspection and maintenance activities applicable to the transmission facilities comprising each of the transmission paths identified in Attachment A - Table 2. b. Standard Requirements (i) TMIP To comply with this Standard, each Responsible Entity identified in Section A4.1 must develop and implement a TMIP. ? Because maintenance and inspection practices vary, it is the intent of this Transmission Maintenance Standard to allow flexibility in inspection and maintenance practices while still requiring a description of certain specific inspection and maintenance practices. (a) TMIP ContentsThe TMIP may be performance-based, time-based, conditional-based, or a combination of all three as may be appropriate. The TMIP shall: ? Identify the facilities for which it is covering by listing the names of each transmission path and the quantities of each equipment component, such as; circuit breaker, relay scheme, transmission line; ? Include the scheduled interval (e.g., every two years) for any time-based maintenance activities and a description of conditions that will initiate any condition or performance-based activities; ? Describe the maintenance, testing and inspection methods for each activity or component listed under Transmission Line Maintenance and Station Maintenance; ? Provide any checklists or forms, or reports used for maintenance activities; ?	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
PRC-STD-005-1 WR1	<p>Provide criteria to be used to assess the condition of a transmission facility or component; ? Specify condition assessment criteria and the requisite response to each condition as may be appropriate for each specific type of component or feature of the transmission facilities; ? Include specific details regarding Transmission Line and Station Maintenance practices as per subsections (1) and (2) below. (1) Transmission Line Maintenance Details The TMIP shall, at a minimum, describe the Responsible Entity's practices for the following transmission line maintenance activities: ? Patrol/Inspection; ? Contamination Control (Insulator Washing) (2) Station Maintenance Details The TMIP shall describe the Responsible Entity's maintenance practices for the following station equipment: ? Circuit Breakers ? Power Transformers (including phase-shifting transformers) ? Regulators ? Protective Relay Systems and associated Communication Equipment ? RAS Systems and associated Communication Equipment ? Reactive Devices (including, but not limited to, Shunt Capacitors, Series Capacitors, Synchronous Condensers, Shunt Reactors, and Tertiary Reactors) (ii) Maintenance Record Keeping M1. Each Responsible Entity identified in Section A.4.1 must retain all pertinent maintenance and inspection records that support the TMIP according to the following guidelines: ? The Responsible Entity shall maintain records of all maintenance and inspection activities for at least five years. ? Each Responsible Entity's maintenance and inspection records shall identify, at a minimum: o The person(s) responsible for performing the work or inspection; o The date(s) the work or inspection was performed; o The transmission facility on which the work was performed, and o A description of the inspection or maintenance performed. The Transmission Owner or Operator shall maintain (and make available on request) records for maintenance or inspection pertaining to the items listed in subsections (a) and (b) below. (a) Transmission Line Maintenance Records ? Patrol/Inspection ? Contamination Control (Insulator Washing) (b) Station Maintenance Records ? Circuit Breakers ? Power Transformers ? Regulators ? Protective Relay Systems and associated Communication Equipment ? RAS Systems and associated Communication Equipment ? Reactive Devices c. Compliance Measures This section defines the items</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
PRC-STD-005-1 WR1	<p>that will be reviewed by WECC Staff to monitor and measure each Responsible Entity's compliance with this Standard, and the compliance levels that will be assessed in the review process. (i) TMIP Certification Each Responsible Entity identified in Section A.4.1 shall annually certify to WECC Staff that it has developed, documented, and implemented a TMIP. (ii) WECC Staff Review WECC Staff will assess performance in the three broad areas described in Paragraph 8 of the Certification Form. These areas are: (1) Development and documentation of the TMIP; (2) Performing maintenance in accordance with the TMIP; (3) Maintaining maintenance records as required by this Standard. (iii) Review Triggers The WECC Staff will conduct a review of the Responsible Entity's TMIP, maintenance and inspection practices and maintenance records when triggered as described below. (a) Disturbance Report. If a WECC Disturbance Report identifies that transmission maintenance and inspection activities were a substantial contributing factor in the disturbance, WECC Staff may request a review of the Responsible Entity. (b) Recommendation by CMWG team. If in its tri-annual review, the CMWG review team notes areas in transmission availability or maintenance that warrant further review, they may recommend a review by the WECC Staff. (c) Incomplete Annual Certification. If the Responsible Entity identified in Section A.4.1 fails to certify one or more categories of paragraph 8 of the Certification Plan, WECC Staff may request a review of the Responsible Entity. (d) Random Audit. The WECC Staff shall randomly select two or three Responsible Entities each year for review. When a review is requested, the Responsible Entity shall make its TMIP and all maintenance records for the facilities that are part of RMS available to the WECC Staff for review within 30 calendar days from the request date.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
PRC-001-1 R1	Each Transmission Operator, Balancing Authority, and Generator Operator shall be familiar with the purpose and limitations of protection system schemes applied in its area.	Compliant	
PRC-001-1 R2	<p>Each Generator Operator and Transmission Operator shall notify reliability entities of relay or equipment failures as follows:</p> <p>R2.1 - If a protective relay or equipment failure reduces system</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
PRC-001-1 R2	<p>reliability, the Generator Operator shall notify its Transmission Operator and Host Balancing Authority. The Generator Operator shall take corrective action as soon as possible.</p> <p>R2.2 - If a protective relay or equipment failure reduces system reliability, the Transmission Operator shall notify its Reliability Coordinator and affected Transmission Operators and Balancing Authorities. The Transmission Operator shall take corrective action as soon as possible.</p>	Compliant	
PRC-001-1 R3	<p>A Generator Operator or Transmission Operator shall coordinate new protective systems and changes as follows.</p> <p>R3.1 - Each Generator Operator shall coordinate all new protective systems and all protective system changes with its Transmission Operator and Host Balancing Authority.</p> <p>R3.2 - Each Transmission Operator shall coordinate all new protective systems and all protective system changes with neighboring Transmission Operators and Balancing Authorities.</p>	Compliant	
PRC-001-1 R4	Each Transmission Operator shall coordinate protection systems on major transmission lines and interconnections with neighboring Generator Operators, Transmission Operators, and Balancing Authorities.	Compliant	
PRC-001-1 R5	<p>A Generator Operator or Transmission Operator shall coordinate changes in generation, transmission, load or operating conditions that could require changes in the protection systems of others:</p> <p>R5.1 - Each Generator Operator shall notify its Transmission Operator in advance of changes in generation or operating conditions that could require changes in the Transmission Operator's protection systems.</p> <p>R5.2 - Each Transmission Operator shall notify neighboring Transmission Operators in advance of changes in generation, transmission, load, or operating conditions that could require changes in the other Transmission Operators' protection systems.</p>	Compliant	
PRC-001-1 R6	Each Transmission Operator and Balancing Authority shall monitor the status of each Special Protection System in their	Do Not Own	Milford does not own or operate a Special Protection System (SPS).

Standard Requirement	Description	Compliant?	Entity Comment
PRC-001-1 R6	area, and shall notify affected Transmission Operators and Balancing Authorities of each change in status.	Do Not Own	Milford does not own or operate a Special Protection System (SPS).
PRC-004-1 R1	The Transmission Owner and any Distribution Provider that owns a transmission Protection System shall each analyze its transmission Protection System Misoperations and shall develop and implement a Corrective Action Plan to avoid future Misoperations of a similar nature according to the Regional Reliability Organization's procedures developed for Reliability Standard PRC-003 Requirement 1.	Compliant	
PRC-004-1 R2	The Generator Owner shall analyze its generator Protection System Misoperations, and shall develop and implement a Corrective Action Plan to avoid future Misoperations of a similar nature according to the Regional Reliability Organization's procedures developed for PRC-003 R1.	Compliant	
PRC-004-WECC-1 R1	<p>System Operators and System Protection personnel of the Transmission Owners and Generator Owners shall analyze all Protection System and RAS operations. [Violation Risk Factor: Lower] [Time Horizon: Operations Assessment]</p> <p>R1.1 - System Operators shall review all tripping of transmission elements and RAS operations to identify apparent Misoperations within 24 hours.</p> <p>R1.2 - System Protection personnel shall analyze all operations of Protection Systems and RAS within 20 business days for correctness to characterize whether a Misoperation has occurred that may not have been identified by System Operators.</p>	Compliant	
PRC-004-WECC-1 R2	Transmission Owners and Generator Owners shall perform the following actions for each Misoperation of the Protection System or RAS. It is not intended that Requirements R2.1 through R2.4 apply to Protection System and/or RAS actions that appear to be entirely reasonable and correct at the time of occurrence and associated system performance is fully compliant with NERC Reliability Standards. If the Transmission Owner or Generator Owner later finds the Protection System or RAS operation to be incorrect through System Protection personnel analysis, the requirements of R2.1 through R2.4 become applicable at the time the Transmission Owner or Generator Owner identifies the	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
PRC-004-WECC-1 R2	<p>Misoperation:</p> <p>R2.1 - If the Protection System or RAS has a Security-Based Misoperation and two or more Functionally Equivalent Protection Systems (FEPS) or Functionally Equivalent RAS (FERAS) remain in service to ensure Bulk Electric System (BES) reliability, the Transmission Owners or Generator Owners shall remove from service the Protection System or RAS that misoperated within 22 hours following identification of the Misoperation. Repair or replacement of the failed Protection System or RAS is at the Transmission Owners' and Generator Owners' discretion. [Violation Risk Factor: High] [Time Horizon: Same-day Operations]</p> <p>R2.2 - If the Protection System or RAS has a Security-Based Misoperation and only one FEPS or FERAS remains in service to ensure BES reliability, the Transmission Owner or Generator Owner shall perform the following. [Violation Risk Factor: High] [Time Horizon: Same-day Operations]</p> <p>R2.2.1 - Following identification of the Protection System or RAS Misoperation, Transmission Owners and Generator Owners shall remove from service within 22 hours for repair or modification the Protection System or RAS that misoperated.</p> <p>R2.2.2 - The Transmission Owner or Generator Owner shall repair or replace any Protection System or RAS that misoperated with a FEPS or FERAS within 20 business days of the date of removal. The Transmission Owner or Generator Owner shall remove the Element from service or disable the RAS if repair or replacement is not completed within 20 business days.</p> <p>R2.3 - If the Protection System or RAS has a Security-Based or Dependability-Based Misoperation and a FEPS and FERAS is not in service to ensure BES reliability, Transmission Owners or Generator Owners shall repair and place back in service within 22 hours the Protection System or RAS that misoperated. If this cannot be done, then Transmission Owners and Generator Owners shall perform the following. [Violation Risk Factor: High]</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
PRC-004-WECC-1 R2	<p>[Time Horizon: Same-day Operations]</p> <p>R2.3.1 - When a FEPS is not available, the Transmission Owners shall remove the associated Element from service.</p> <p>R2.3.2 - When FERAS is not available, then</p> <p>R2.3.2.1 - The Generator Owners shall adjust generation to a reliable operating level, or</p> <p>R2.3.2.2 - Transmission Operators shall adjust the SOL and operate the facilities within established limits.</p> <p>R2.4 - If the Protection System or RAS has a Dependability-Based Misoperation but has one or more FEPS or FERAS that operated correctly, the associated Element or transmission path may remain in service without removing from service the Protection System or RAS that failed, provided one of the following is performed.</p> <p>R2.4.1 - Transmission Owners or Generator Owners shall repair or replace any Protection System or RAS that misoperated with FEPS and FERAS within 20 business days of the date of the Misoperation identification, or</p> <p>R2.4.2 - Transmission Owners or Generator Owners shall remove from service the associated Element or RAS. [Violation Risk Factor: Lower] [Time Horizon: Operations Assessment]</p>	Compliant	
PRC-004-WECC-1 R3	<p>Transmission Owners and Generation Owners shall submit Misoperation incident reports to WECC within 10 business days for the following. [Violation Risk Factor: Lower] [Time Horizon: Operations Assessment]</p> <p>R3.1 - Identification of a Misoperation of a Protection System and/or RAS,</p> <p>R3.2 - Completion of repairs or the replacement of Protection System and/or RAS that misoperated.</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
PRC-005-1 R1	<p>Each Transmission Owner and any Distribution Provider that owns a transmission Protection System and each Generator Owner that owns a generation Protection System shall have a Protection System maintenance and testing program for Protection Systems that affect the reliability of the BES. The program shall include:</p> <p>R1.1 - Maintenance and testing intervals and their basis.</p> <p>R1.2 - Summary of maintenance and testing procedures.</p>	Compliant	
PRC-005-1 R2	<p>Each Transmission Owner and any Distribution Provider that owns a transmission Protection System and each Generator Owner that owns a generation Protection System shall provide documentation of its Protection System maintenance and testing program and the implementation of that program to its Regional Reliability Organization on request (within 30calendar days). The documentation of the program implementation shall include:</p> <p>R2.1 - Evidence Protection System devices were maintained and tested within the defined intervals.</p> <p>R2.2 - Date each Protection System device was last tested/maintained.</p>	Not Compliant	Milford has identified a minor self-reportable issue in complying with an interval set forth in its protection system maintenance and testing program during the 2011 Self Certification Period. The facility did not complete one cycle of a restrictive 6-month testing program in which the protective relay data files are downloaded to a PC and analyzed for proper relay health. No misoperations or operational issues have been caused in relation to this issue. Due to the relatively new microprocessor controlled and alarmed equipment Milford feels the issue created a very low reliability risk to the Bulk Electric System (BES). Milford will prepare and promptly submit responses to WECC's data request.
PRC-007-0 R2	The Transmission Owner, Transmission Operator, Distribution Provider, and Load-Serving Entity that owns or operates a UFLS program (as required by its Regional Reliability Organization) shall provide, and annually update, its underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
PRC-008-0 R1	The Transmission Owner and Distribution Provider with a UFLS program (as required by its Regional Reliability Organization) shall have a UFLS equipment maintenance and testing program in place. This UFLS equipment maintenance and testing program shall include UFLS equipment identification, the schedule for UFLS equipment testing, and the schedule for UFLS equipment maintenance.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
PRC-008-0 R2	The Transmission Owner and Distribution Provider with a UFLS program (as required by its Regional Reliability Organization)	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC,

Standard Requirement	Description	Compliant?	Entity Comment
PRC-008-0 R2	shall implement its UFLS equipment maintenance and testing program and shall provide UFLS maintenance and testing program results to its Regional Reliability Organization and NERC on request (within 30 calendar days).	Not Applicable	NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
PRC-011-0 R1	<p>The Transmission Owner and Distribution Provider that owns a UVLS system shall have a UVLS equipment maintenance and testing program in place. This program shall include:</p> <p>R1.1 - The UVLS system identification which shall include but is not limited to:</p> <p>R1.1.1 - Relays.</p> <p>R1.1.2 - Instrument transformers.</p> <p>R1.1.3 - Communications systems, where appropriate.</p> <p>R1.1.4 - Batteries.</p> <p>R1.2 - Documentation of maintenance and testing intervals and their basis.</p> <p>R1.3 - Summary of testing procedure.</p> <p>R1.4 - Schedule for system testing.</p> <p>R1.5 - Schedule for system maintenance.</p> <p>R1.6 - Date last tested/maintained.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
PRC-016-0.1 R3	The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall provide documentation of the misoperation analyses and the corrective action plans to its Regional Reliability Organization and NERC on request (within 90 calendar days).	Do Not Own	Milford does not own or operate a Special Protection System (SPS).
PRC-017-0 R1	The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall have a system maintenance and testing program(s) in place. The program(s) shall include:	Do Not Own	Milford does not own or operate a Special Protection System (SPS).

Standard Requirement	Description	Compliant?	Entity Comment
PRC-017-0 R1	<p>R1.1 - SPS identification shall include but is not limited to:</p> <p>R1.1.1 - Relays.</p> <p>R1.1.2 - Instrument transformers.</p> <p>R1.1.3 - Communications systems, where appropriate.</p> <p>R1.1.4 - Batteries.</p> <p>R1.2 - Documentation of maintenance and testing intervals and their basis.</p> <p>R1.3 - Summary of testing procedure.</p> <p>R1.4 - Schedule for system testing.</p> <p>R1.5 - Schedule for system maintenance.</p> <p>R1.6 - Date last tested/maintained.</p>	Do Not Own	Milford does not own or operate a Special Protection System (SPS).
PRC-017-0 R2	The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall provide documentation of the program and its implementation to the appropriate Regional Reliability Organizations and NERC on request (within 30 calendar days).	Do Not Own	Milford does not own or operate a Special Protection System (SPS).
PRC-021-1 R1	<p>Each Transmission Owner and Distribution Provider that owns a UVLS program to mitigate the risk of voltage collapse or voltage instability in the BES shall annually update its UVLS data to support the Regional UVLS program database. The following data shall be provided to the Regional Reliability Organization for each installed UVLS system:</p> <p>R1.1 - Size and location of customer load, or percent of connected load, to be interrupted.</p> <p>R1.2 - Corresponding voltage set points and overall scheme clearing times.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
PRC-021-1 R1	<p>R1.3 - Time delay from initiation to trip signal.</p> <p>R1.4 - Breaker operating times.</p> <p>R1.5 - Any other schemes that are part of or impact the UVLS programs such as related generation protection, islanding schemes, automatic load restoration schemes, UFLS and Special Protection Systems.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
PRC-023-1 R1	<p>Each Transmission Owner, Generator Owner, and Distribution Provider shall use any one of the following criteria (R1.1 through R1.13) for any specific circuit terminal to prevent its phase protective relay settings from limiting transmission system loadability while maintaining reliable protection of the Bulk Electric System for all fault conditions. Each Transmission Owner, Generator Owner, and Distribution Provider shall evaluate relay loadability at 0.85 per unit voltage and a power factor angle of 30 degrees: [Violation Risk Factor: High] [Mitigation Time Horizon: Long Term Planning].</p> <p>R1.1 - Set transmission line relays so they do not operate at or below 150% of the highest seasonal Facility Rating of a circuit, for the available defined loading duration nearest 4 hours (expressed in amperes).</p> <p>R1.2 - Set transmission line relays so they do not operate at or below 115% of the highest seasonal 15-minute Facility Rating [When a 15-minute rating has been calculated and published for use in real-time operations, the 15-minute rating can be used to establish the loadability requirement for the protective relays.] of a circuit (expressed in amperes).</p> <p>R1.3 - Set transmission line relays so they do not operate at or below 115% of the maximum theoretical power transfer capability (using a 90-degree angle between the sending-end and receiving-end voltages and either reactance or complex impedance) of the circuit (expressed in amperes) using one of the following to perform the power transfer calculation:</p> <p>R1.3.1 - An infinite source (zero source impedance) with a 1.00</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
PRC-023-1 R1	<p>per unit bus voltage at each end of the line.</p> <p>R1.3.2 - Set transmission line relays so they do not operate at or below 115% of the highest seasonal 15-minute Facility Rating [When a 15-minute rating has been calculated and published for use in real-time operations, the 15-minute rating can be used to establish the loadability requirement for the protective relays.] of a circuit (expressed in amperes).</p> <p>R1.4 - Set transmission line relays on series compensated transmission lines so they do not operate at or below the maximum power transfer capability of the line, determined as the greater of: - 115% of the highest emergency rating of the series capacitor. - 115% of the maximum power transfer capability of the circuit (expressed in amperes), calculated in accordance with R1.3, using the full line inductive reactance.</p> <p>R1.5 - Set transmission line relays on weak source systems so they do not operate at or below 170% of the maximum end-of-line three-phase fault magnitude (expressed in amperes).</p> <p>R1.6 - Set transmission line relays applied on transmission lines connected to generation stations remote to load so they do not operate at or below 230% of the aggregated generation nameplate capability.</p> <p>R1.7 - Set transmission line relays applied at the load center terminal, remote from generation stations, so they do not operate at or below 115% of the maximum current flow from the load to the generation source under any system configuration.</p> <p>R1.8 - Set transmission line relays applied on the bulk system-end of transmission lines that serve load remote to the system so they do not operate at or below 115% of the maximum current flow from the system to the load under any system configuration.</p> <p>R1.9 - Set transmission line relays applied on the load-end of transmission lines that serve load remote to the bulk system so they do not operate at or below 115% of the maximum current</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
PRC-023-1 R1	<p>flow from the load to the system under any system configuration.</p> <p>R1.10 - Set transformer fault protection relays and transmission line relays on transmission lines terminated only with a transformer so that they do not operate at or below the greater of: - 150% of the applicable maximum transformer nameplate rating (expressed in amperes), including the forced cooled ratings corresponding to all installed supplemental cooling equipment. - 115% of the highest operator established emergency transformer rating.</p> <p>R1.11 - For transformer overload protection relays that do not comply with R1.10 set the relays according to one of the following: - Set the relays to allow the transformer to be operated at an overload level of at least 150% of the maximum applicable nameplate rating, or 115% of the highest operator established emergency transformer rating, whichever is greater. The protection must allow this overload for at least 15 minutes to allow for the operator to take controlled action to relieve the overload. - Install supervision for the relays using either a top oil or simulated winding hot spot temperature element. The setting should be no less than 100° C for the top oil or 140° C for the winding hot spot temperature [IEEE standard C57.115, Table 3, specifies that transformers are to be designed to withstand a winding hot spot temperature of 180 degrees C, and cautions that bubble formation may occur above 140 degrees C.].</p> <p>R1.12 - When the desired transmission line capability is limited by the requirement to adequately protect the transmission line, set the transmission line distance relays to a maximum of 125% of the apparent impedance (at the impedance angle of the transmission line) subject to the following constraints:</p> <p>R1.12.1 - Set the maximum torque angle (MTA) to 90 degrees or the highest supported by the manufacturer.</p> <p>R1.12.2 - Evaluate the relay loadability in amperes at the relay trip point at 0.85 per unit voltage and a power factor angle of 30 degrees.</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
PRC-023-1 R1	<p>R1.12.3 - Include a relay setting component of 87% of the current calculated in R1.12.2 in the Facility Rating determination for the circuit.</p> <p>R1.13 - Where other situations present practical limitations on circuit capability, set the phase protection relays so they do not operate at or below 115% of such limitations.</p>	Compliant	
PRC-023-1 R2	<p>The Transmission Owner, Generator Owner, or Distribution Provider that uses a circuit capability with the practical limitations described in R1.6, R1.7, R1.8, R1.9, R1.12, or R1.13 shall use the calculated circuit capability as the Facility Rating of the circuit and shall obtain the agreement of the Planning Coordinator, Transmission Operator, and Reliability Coordinator with the calculated circuit capability. Violation Risk Factor: Medium] [Time Horizon: Long Term Planning]</p>	Compliant	
TOP-STD-007-0 WR1	<p>WR1. Operating Transfer Capability Limit Criteria Actual power flow and net scheduled power flow over an interconnection or transfer path shall be maintained within Operating Transfer Capability Limits ("OTC"). The OTC is the maximum amount of actual power that can be transferred over direct or parallel transmission elements comprising: ? An interconnection from one Transmission Operator area to another Transmission Operator area; or ? A transfer path within a Transmission Operator area. The net schedule over an interconnection or transfer path within a Transmission Operator area shall not exceed the OTC, regardless of the prevailing actual power flow on the interconnection or transfer path. a. Operating limits. No elements within the interconnection shall be scheduled above continuous operating limits. An element is defined as any generating unit, transmission line, transformer, bus, or piece of electrical equipment involved in the transfer of power within an interconnection. b. Stability. The interconnected power system shall remain stable upon loss of any one single element without system cascading that could result in the successive loss of additional elements. The system voltages shall be within acceptable limits defined in the WECC Reliability Criteria for Transmission System Planning. If a single event could cause loss</p>	Not Applicable	<p>A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.</p>

Standard Requirement	Description	Compliant?	Entity Comment
TOP-STD-007-0 WR1	of multiple elements, these shall be considered in lieu of a single element outage. This could occur in exceptional cases such as two lines on the same right-of-way next to an airport. In either case, loss of either single or multiple elements should not cause uncontrolled, widespread collapse of the interconnected power system. For purposes of this Section, stability shall include transient stability, post transient stability or dynamic stability whichever is most limiting to OTC. c. System contingency response. Following the outage and before adjustments can be made: (i) No remaining element shall exceed its short-time emergency rating. (ii) The steady-state system voltages shall be within emergency limits. The limiting event shall be determined by conducting power flow and stability studies while simulating various operating conditions. These studies shall be updated as system configurations introduce significant changes in the interconnection.(Source: WECC Criterion)	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-001-1 R1	Each Transmission Operator shall have the responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its area and shall exercise specific authority to alleviate operating emergencies.	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
TOP-001-1 R3	Each Transmission Operator, Balancing Authority, and Generator Operator shall comply with reliability directives issued by the Reliability Coordinator, and each Balancing Authority and Generator Operator shall comply with reliability directives issued by the Transmission Operator, unless such actions would violate safety, equipment, regulatory or statutory requirements. Under these circumstances the Transmission Operator, Balancing Authority or Generator Operator shall immediately inform the Reliability Coordinator or Transmission Operator of the inability to perform the directive so that the Reliability Coordinator or Transmission Operator can implement alternate remedial actions.	Compliant	
TOP-001-1 R5	Each Transmission Operator shall inform its Reliability Coordinator and any other potentially affected Transmission Operators of real time or anticipated emergency conditions, and take actions to avoid, when possible, or mitigate the emergency.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-001-1 R8	During a system emergency, the Balancing Authority and	Not Applicable	A specific list of TO/TOP requirements was assigned to

Standard Requirement	Description	Compliant?	Entity Comment
TOP-001-1 R8	Transmission Operator shall immediately take action to restore the Real and Reactive Power Balance. If the Balancing Authority or Transmission Operator is unable to restore Real and Reactive Power Balance it shall request emergency assistance from the Reliability Coordinator. If corrective action or emergency assistance is not adequate to mitigate the Real and Reactive Power Balance, then the Reliability Coordinator, Balancing Authority, and Transmission Operator shall implement firm load shedding.	Not Applicable	Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-002-2a R1	Each Balancing Authority and Transmission Operator shall maintain a set of current plans that are designed to evaluate options and set procedures for reliable operation through a reasonable future time period. In addition, each Balancing Authority and Transmission Operator shall be responsible for using available personnel and system equipment to implement these plans to ensure that interconnected system reliability will be maintained.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-002-2a R6	Each Balancing Authority and Transmission Operator shall plan to meet unscheduled changes in system configuration and generation dispatch (at a minimum N-1 Contingency planning) in accordance with NERC, Regional Reliability Organization, subregional, and local reliability requirements.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-002-2a R11	The Transmission Operator shall perform seasonal, next-day, and current-day Bulk Electric System studies to determine SOLs. Neighboring Transmission Operators shall utilize identical SOLs for common facilities. The Transmission Operator shall update these Bulk Electric System studies as necessary to reflect current system conditions; and shall make the results of Bulk Electric System studies available to the Transmission Operators, Balancing Authorities (subject to confidentiality requirements), and to its Reliability Coordinator.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-002-2a R18	Neighboring Balancing Authorities, Transmission Operators, Generator Operators, Transmission Service Providers and Load Serving Entities shall use uniform line identifiers when referring to transmission facilities of an interconnected network.	Compliant	
TOP-004-2 R6	Transmission Operators, individually and jointly with other Transmission Operators, shall develop, maintain, and implement	Not Compliant	Milford is working diligently to ensure that it is in full compliance with all TO/TOP standards that recently became

Standard Requirement	Description	Compliant?	Entity Comment
TOP-004-2 R6	<p>formal policies and procedures to provide for transmission reliability. These policies and procedures shall address the execution and coordination of activities that impact inter- and intra-Regional reliability, including:</p> <p>R6.1 - Monitoring and controlling voltage levels and real and reactive power flows.</p> <p>R6.2 - Switching transmission elements.</p> <p>R6.3 - Planned outages of transmission elements.</p> <p>R6.4 - Responding to IROL and SOL violations.</p>	Not Compliant	applicable in FERC Docket No. RC11-2, which concluded 12/2/2011 and will prepare and promptly submit responses to WECC's data request.
TOP-005-1.1 R1	<p>Each Transmission Operator and Balancing Authority shall provide its Reliability Coordinator with the operating data that the Reliability Coordinator requires to perform operational reliability assessments and to coordinate reliable operations within the Reliability Coordinator Area.</p> <p>R1.1 - Each Reliability Coordinator shall identify the data requirements from the list in Attachment 1-TOP-005-0 "Electric System Reliability Data" and any additional operating information requirements relating to operation of the bulk power system within the Reliability Coordinator Area.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-005-1.1 R2	As a condition of receiving data from the Interregional Security Network (ISN), each ISN data recipient shall sign the NERC Confidentiality Agreement for "Electric System Reliability Data."	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-005-1.1 R3	Upon request, each Balancing Authority and Transmission Operator shall provide to other Balancing Authorities and Transmission Operators with immediate responsibility for operational reliability, the operating data that are necessary to allow these Balancing Authorities and Transmission Operators to perform operational reliability assessments and to coordinate reliable operations. Balancing Authorities and Transmission Operators shall provide the types of data as listed in Attachment 1-TOP-005-0 "Electric System Reliability Data," unless otherwise	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
TOP-005-1.1 R3	agreed to by the Balancing Authorities and Transmission Operators with immediate responsibility for operational reliability.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-005-1.1a R1	<p>Each Transmission Operator and Balancing Authority shall provide its Reliability Coordinator with the operating data that the Reliability Coordinator requires to perform operational reliability assessments and to coordinate reliable operations within the Reliability Coordinator Area.</p> <p>R1.1 - Each Reliability Coordinator shall identify the data requirements from the list in Attachment 1-TOP-005-0 "Electric System Reliability Data" and any additional operating information requirements relating to operation of the bulk power system within the Reliability Coordinator Area.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-005-1.1a R2	As a condition of receiving data from the Interregional Security Network (ISN), each ISN data recipient shall sign the NERC Confidentiality Agreement for "Electric System Reliability Data."	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-005-1.1a R3	Upon request, each Balancing Authority and Transmission Operator shall provide to other Balancing Authorities and Transmission Operators with immediate responsibility for operational reliability, the operating data that are necessary to allow these Balancing Authorities and Transmission Operators to perform operational reliability assessments and to coordinate reliable operations. Balancing Authorities and Transmission Operators shall provide the types of data as listed in Attachment 1-TOP-005-0 "Electric System Reliability Data," unless otherwise agreed to by the Balancing Authorities and Transmission Operators with immediate responsibility for operational reliability.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-005-2a R1	As a condition of receiving data from the Interregional Security Network (ISN), each ISN data recipient shall sign the NERC Confidentiality Agreement for "Electric System Reliability Data."	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
TOP-005-2a R2	Upon request, each Balancing Authority and Transmission Operator shall provide to other Balancing Authorities and Transmission Operators with immediate responsibility for operational reliability, the operating data that are necessary to allow these Balancing Authorities and Transmission Operators to perform operational reliability assessments and to coordinate reliable operations. Balancing Authorities and Transmission Operators shall provide the types of data as listed in Attachment 1-TOP-005 "Electric System Reliability Data," unless otherwise agreed to by the Balancing Authorities and Transmission Operators with immediate responsibility for operational reliability.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-006-1 R1	<p>Each Transmission Operator and Balancing Authority shall know the status of all generation and transmission resources available for use.</p> <p>R1.1 - Each Generator Operator shall inform its Host Balancing Authority and the Transmission Operator of all generation resources available for use.</p> <p>R1.2 - Each Transmission Operator and Balancing Authority shall inform the Reliability Coordinator and other affected Balancing Authorities and Transmission Operators of all generation and transmission resources available for use.</p>	Not Compliant	Milford has identified an issue related to the outage coordination of one scheduled maintenance outage during the self-certification period that it determines to be reportable.
TOP-006-1 R2	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall monitor applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-006-1 R4	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall have information, including weather forecasts and past load patterns, available to predict the system's near-term load pattern.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-006-1 R5	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall use monitoring equipment to bring to the attention of operating personnel important deviations in operating conditions and to indicate, if appropriate, the need for corrective action.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
TOP-006-1 R6	Each Balancing Authority and Transmission Operator shall use sufficient metering of suitable range, accuracy and sampling rate (if applicable) to ensure accurate and timely monitoring of operating conditions under both normal and emergency situations.	Compliant	
TOP-006-1 R7	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall monitor system frequency.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-006-2 R1	<p>Each Transmission Operator and Balancing Authority shall know the status of all generation and transmission resources available for use.</p> <p>R1.1 - Each Generator Operator shall inform its Host Balancing Authority and the Transmission Operator of all generation resources available for use.</p> <p>R1.2 - Each Transmission Operator and Balancing Authority shall inform the Reliability Coordinator and other affected Balancing Authorities and Transmission Operators of all generation and transmission resources available for use.</p>	Not Compliant	Milford has identified an issue related to the outage coordination of one scheduled maintenance outage during the self-certification period that it determines to be reportable.
TOP-006-2 R2	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall monitor applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-006-2 R4	Each Transmission Operator, and Balancing Authority shall have information, including weather forecasts and past load patterns, available to predict the system's near-term load pattern.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-006-2 R5	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall use monitoring equipment to bring to the attention of operating personnel important deviations in operating conditions and to indicate, if appropriate, the need for corrective action.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
TOP-006-2 R6	Each Balancing Authority and Transmission Operator shall use sufficient metering of suitable range, accuracy and sampling rate (if applicable) to ensure accurate and timely monitoring of operating conditions under both normal and emergency situations.	Compliant	
TOP-006-2 R7	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall monitor system frequency.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-007-0 R1	A Transmission Operator shall inform its Reliability Coordinator when an IROL or SOL has been exceeded and the actions being taken to return the system to within limits.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-007-0 R2	Following a Contingency or other event that results in an IROL violation, the Transmission Operator shall return its transmission system to within IROL as soon as possible, but not longer than 30 minutes.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
TOP-007-WECC-1 R1	When the actual power flow exceeds an SOL for a Transmission path, the Transmission Operators shall take immediate action to reduce the actual power flow across the path such that at no time shall the power flow for the Transmission path exceed the SOL for more than 30 minutes. [Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
VAR-001-1 R1	Each Transmission Operator, individually and jointly with other Transmission Operators, shall ensure that formal policies and procedures are developed, maintained, and implemented for monitoring and controlling voltage levels and Mvar flows within their individual areas and with the areas of neighboring Transmission Operators.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
VAR-001-1 R2	Each Transmission Operator shall acquire sufficient reactive resources within its area to protect the voltage levels under normal and Contingency conditions. This includes the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
VAR-001-1 R3	<p>The Transmission Operator shall specify criteria that exempts generators from compliance with the requirements defined in Requirement 4, and Requirement 6.1.</p> <p>R3.1 - Each Transmission Operator shall maintain a list of generators in its area that are exempt from following a voltage or Reactive Power schedule.</p> <p>R3.2 - For each generator that is on this exemption list, the Transmission Operator shall notify the associated Generator Owner.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
VAR-001-1 R4	<p>Each Transmission Operator shall specify a voltage or Reactive Power schedule (The voltage schedule is a target voltage to be maintained within a tolerance band during a specified period.) at the interconnection between the generator facility and the Transmission Owner's facilities to be maintained by each generator. The Transmission Operator shall provide the voltage or Reactive Power schedule to the associated Generator Operator and direct the Generator Operator to comply with the schedule in automatic voltage control mode (AVR in service and controlling voltage).</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
VAR-001-1 R6	<p>The Transmission Operator shall know the status of all transmission Reactive Power resources, including the status of voltage regulators and power system stabilizers.</p> <p>R6.1 - When notified of the loss of an automatic voltage regulator control, the Transmission Operator shall direct the Generator Operator to maintain or change either its voltage schedule or its Reactive Power schedule.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
VAR-001-1 R9	<p>Each Transmission Operator shall maintain reactive resources to support its voltage under first Contingency conditions.</p> <p>R9.1 - Each Transmission Operator shall disperse and locate the reactive resources so that the resources can be applied effectively and quickly when Contingencies occur.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
VAR-001-2 R1	<p>Each Transmission Operator, individually and jointly with other Transmission Operators, shall ensure that formal policies and procedures are developed, maintained, and implemented for</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which

Standard Requirement	Description	Compliant?	Entity Comment
VAR-001-2 R1	monitoring and controlling voltage levels and Mvar flows within their individual areas and with the areas of neighboring Transmission Operators.	Not Applicable	concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
VAR-001-2 R2	Each Transmission Operator shall acquire sufficient reactive resources – which may include, but is not limited to, reactive generation scheduling; transmission line and reactive resource switching; and controllable load – within its area to protect the voltage levels under normal and Contingency conditions. This includes the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits.	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
VAR-001-2 R3	<p>The Transmission Operator shall specify criteria that exempts generators from compliance with the requirements defined in Requirement 4, and Requirement 6.1.</p> <p>R3.1 - Each Transmission Operator shall maintain a list of generators in its area that are exempt from following a voltage or Reactive Power schedule.</p> <p>R3.2 - For each generator that is on this exemption list, the Transmission Operator shall notify the associated Generator Owner.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
VAR-001-2 R4	Each Transmission Operator shall specify a voltage or Reactive Power schedule ¹ at the interconnection between the generator facility and the Transmission Owner's facilities to be maintained by each generator. The Transmission Operator shall provide the voltage or Reactive Power schedule to the associated Generator Operator and direct the Generator Operator to comply with the schedule in automatic voltage control mode (AVR in service and controlling voltage).	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
VAR-001-2 R6	<p>The Transmission Operator shall know the status of all transmission Reactive Power resources, including the status of voltage regulators and power system stabilizers.</p> <p>R6.1 - When notified of the loss of an automatic voltage regulator control, the Transmission Operator shall direct the Generator Operator to maintain or change either its voltage schedule or its Reactive Power schedule.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.

Standard Requirement	Description	Compliant?	Entity Comment
VAR-001-2 R9	<p>Each Transmission Operator shall maintain reactive resources – which may include, but is not limited to, reactive generation scheduling; transmission line and reactive resource switching; and controllable load– to support its voltage under first Contingency conditions.</p> <p>R9.1 - Each Transmission Operator shall disperse and locate the reactive resources so that the resources can be applied effectively and quickly when Contingencies occur.</p>	Not Applicable	A specific list of TO/TOP requirements was assigned to Milford Wind Corridor Phase I, LLC ("Milford") by FERC, NERC and WECC in FERC Docket No. RC11-2, which concluded 12/2/2011. This requirement was not on that list and thus is not applicable to Milford.
VAR-002-1.1b R4	<p>The Generator Owner shall provide the following to its associated Transmission Operator and Transmission Planner within 30 calendar days of a request.</p> <p>R4.1 - For generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage:</p> <p>R4.1.1 - Tap settings.</p> <p>R4.1.2 - Available fixed tap ranges.</p> <p>R4.1.3 - Impedance data.</p> <p>R4.1.4 - The +/- voltage range with step-change in % for load-tap changing transformers.</p>	Compliant	
VAR-002-1.1b R5	<p>After consultation with the Transmission Operator regarding necessary step-up transformer tap changes, the Generator Owner shall ensure that transformer tap positions are changed according to the specifications provided by the Transmission Operator, unless such action would violate safety, an equipment rating, a regulatory requirement, or a statutory requirement.</p> <p>R5.1 - If the Generator Operator can't comply with the Transmission Operator's specifications, the Generator Operator shall notify the Transmission Operator and shall provide the technical justification.</p>	Compliant	
VAR-002-WECC-1 R1	Generator Operators and Transmission Operators shall have AVR in service and in automatic voltage control mode 98% of all	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
VAR-002-WECC-1 R1	<p>operating hours for synchronous generators or synchronous condensers. Generator Operators and Transmission Operators may exclude hours for R1.1 through R1.10 to achieve the 98% requirement. [Violation Risk Factor: Medium] [Time Horizon: Operations Assessment]</p> <p>R1.1 - The synchronous generator or synchronous condenser operates for less than five percent of all hours during any calendar quarter.</p> <p>R1.2 - Performing maintenance and testing up to a maximum of seven calendar days per calendar quarter.</p> <p>R1.3 - AVR exhibits instability due to abnormal system configuration.</p> <p>R1.4 - Due to component failure, the AVR may be out of service up to 60 consecutive days for repair per incident.</p> <p>R1.5 - Due to a component failure, the AVR may be out of service up to one year provided the Generator Operator or Transmission Operator submits documentation identifying the need for time to obtain replacement parts and if required to schedule an outage.</p> <p>R1.6 - Due to a component failure, the AVR may be out of service up to 24 months provided the Generator Operator or Transmission Operator submits documentation identifying the need for time for excitation system replacement (replace the AVR, limiters, and controls but not necessarily the power source and power bridge) and to schedule an outage.</p> <p>R1.7 - The synchronous generator or synchronous condenser has not achieved Commercial Operation.</p> <p>R1.8 - The Transmission Operator directs the Generator Operator to operate the synchronous generator, and the AVR is unavailable for service.</p> <p>R1.9 - The Reliability Coordinator directs Transmission Operator</p>	Compliant	

Standard Requirement	Description	Compliant?	Entity Comment
VAR-002-WECC-1 R1	<p>to operate the synchronous condenser, and the AVR is unavailable for service.</p> <p>R1.10 - If AVR exhibits instability due to operation of a Load Tap Changer (LTC) transformer in the area, the Transmission Operator may authorize the Generator Operator to operate the excitation system in modes other than automatic voltage control until the system configuration changes.</p>	Compliant	
VAR-002-WECC-1 R2	<p>Generator Operators and Transmission Operators shall have documentation identifying the number of hours excluded for each requirement in R1.1 through R1.10. [Violation Risk Factor: Low] [Time Horizon: Operations Assessment]</p>	Compliant	

Attachment c

Record documents for the violation of EOP-005-1 R1

**c-1. MILW's Mitigation Plan designated as
WECCMIT007817 submitted August 6, 2012**

**c-2. MILW's Certification of Mitigation Plan
Completion dated October 2, 2012**

**c-3. WECC's Verification of Mitigation Plan
Completion dated November 14, 2012**

Mitigation Plan

Registered Entity: Milford Wind Corridor Phase I, LLC

Mit Plan Code	NERC Violation ID	Requirement	Violation Validated On	Mit Plan Version
	WECC2012009491	EOP-005-1 R1	03/12/2012	1

Mitigation Plan Submitted On: August 06, 2012

Mitigation Plan Accepted On:

Mitigation Plan Proposed Completion Date: September 30, 2012

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by MILW On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Section A: Compliance Notices

Section 6.2 of the NERC 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 B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Section B: Registered Entity Information

B.1 Identify your organization:

Entity Name: Milford Wind Corridor Phase I, LLC
NERC Compliance Registry ID: NCR10394
Address: 179 Lincoln St.
Suite 500
Boston MA 02111

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

Name: Hallie Flint Gilman
Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance
Email: regulatory@firstwind.com
Phone: 207-228-6887

Section C: Identification of Reliability Standard Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2012009491	01/20/2012	EOP-005-1 R1
<p>Each Transmission Operator shall have a restoration plan to reestablish its electric system in a stable and orderly manner in the event of a partial or total shutdown of its system, including necessary operating instructions and procedures to cover emergency conditions, and the loss of vital telecommunications channels. Each Transmission Operator shall include the applicable elements listed in Attachment 1-EOP-005 in developing a restoration plan.</p> <p>See NERC Standard for Attachment.</p>		

C.2 Brief summary including the cause of the violation(s) and mechanism in which it was identified above:

On January 20, 2012, Milford self-certified potential noncompliance with the EOP-005-1 R1. At the time, Milford did not have an emergency restoration plan as required by EOP-005-1 R1. This lack of an emergency restoration plan was the cause of the potential noncompliance with this requirements.

It should be noted that Milford's registration as a TO and TOP was appealed to and pending before FERC for several months, including in January 2012 when the self-certification was required. Until June 13, 2012, Milford's registration status and the applicability of specific reliability requirements were in question due to Milford's appeal of the registration of its generator lead facilities as a TO/TOP. Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,214 (2012).

C.3 Provide any relevant information regarding the identification of the violation(s) associated with this Mitigation Plan:

Despite the fact that Milford's registration status and the applicability of specific reliability requirements were in question, and even though FERC had yet to rule on the applicability of those requirements to Milford, Milford has diligently worked toward compliance with the reliability standards requirements set forth in the Compliance Filing of the North American Electric Reliability Corporation, FERC Docket Nos. RC11-1-000 and RC11-2-000 (December 12, 2011). Milford submitted its January 2012 self-certifications as if the listing of requirements in that compliance filing was final, and it candidly identified areas in which it would need to implement processes and procedures in order to satisfy the relevant requirements, referencing the registration appeal in the comments section to each self-certification.

Section D: Details of Proposed Mitigation Plan

- 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 violation(s) identified above in Section C.1 of this form:

Milford is currently in the process of developing an emergency restoration plan and will have adopted such a plan by September 30, 2012. This emergency restoration plan will provide for an annual review, periodic testing of necessary telecommunications facilities, training of operating personnel, and verification of the restoration procedure by actual testing or simulation.

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

Proposed Completion date of Mitigation Plan: September 30, 2012

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

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date
Adopt emergency restoration plan	Adopt emergency restoration plan	09/30/2012	

- D.4 Additional Relevant Information (Optional)

Section E: Interim and Future Reliability Risk

E.1 Abatement of Interim BPS Reliability Risk

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

As WECC has assessed in the June 13, 2012 Notice of Alleged Violation, these alleged violations posed minimal risk to the BES given the nature of Milford's facilities and operations: Milford's is an intermittent resource, its generator lead facilities are limited in use and Milford's BA has adequate provisions in place to cover generation unavailability. Because Milford's generation is not baseload and could be replaced by the BA, there is minimal risk to the BES while the Mitigation Plan is being implemented.

E.2 Prevention of Future BPS Reliability Risk

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

Milford's development and implementation of its emergency restoration as described above will prevent recurrence of the alleged violations.

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

Section F: Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

(a) Submits the Mitigation Plan, as laid out in Section D, to the Regional Entity for acceptance 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 Assoc. General Counsel, Dir. of Electric Regulatory Compliance of Milford Wind Corridor Phase I,
2. I am qualified to sign this Mitigation Plan on behalf of Milford Wind Corridor Phase I, LLC
3. I have read and understand Milford Wind Corridor Phase I, LLC's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure and the NERC CMEP currently in effect or the NERC CMEP-Province of Manitoba, Schedule B currently in effect, whichever is applicable.
4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
5. Milford Wind Corridor Phase I, LLC Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authorities in Canada.

Authorized Individual Signature: _____
(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Authorized On: August 06, 2012

Certification of Mitigation Plan Completion

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

Registered Entity Name: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

NERC Violation ID(s): WECC2012009491

Mitigated Standard Requirement(s): EOP-005-1 R1,

Scheduled Completion as per Accepted Mitigation Plan: September 30, 2012

Date Mitigation Plan completed: September 17, 2012

WECC Notified of Completion on Date: October 02, 2012

Entity Comment: Please see supporting document OP-700-365-008.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	OP-700-365-008_MIL_System Restoration Plan_1 0.pdf		4,740,402

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Email: hgilman@firstwind.com

Phone:

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

CONFIDENTIAL



Chris Luras
Director of Enforcement

(801) 883-6887
cluras@wecc.biz

VIA WECC ENHANCED FILE TRANSFER SERVER

November 14, 2012

Hallie Gilman
Associate General Counsel
Milford Wind Corridor Phase I, LLC
179 Lincoln St.
Suite 500
Boston, MA 2111

NERC Registration ID: NCR10394
NERC Violation ID: WECC2012009491

Subject: Notice of Completed Mitigation Plan Acceptance
Reliability Standard EOP-005-1 Requirement 1

Hallie,

The Western Electricity Coordinating Council (WECC) received the Certification of Mitigation Plan Completion submitted by Milford Wind Corridor Phase I, LLC (MILW) on October 2, 2012 for the violation of Reliability Standard EOP-005-1 Requirement 1. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

If you have any questions or concerns, please contact Keshav Sarin at ksarin@wecc.biz.

Sincerely,

A handwritten signature in blue ink, appearing to read "CL", is placed above the name and title of the sender.

Chris Luras
Director of Enforcement

CL:dlc

cc: Keshav Sarin, WECC Manager, O&P and CIP

Attachment d

Record documents for the violation of EOP-005-1 R2:

d-1. MILW's Mitigation Plan designated as WECCMIT007818 submitted August 6, 2012

d-2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012

d-3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012

Mitigation Plan

Registered Entity: Milford Wind Corridor Phase I, LLC

Mit Plan Code	NERC Violation ID	Requirement	Violation Validated On	Mit Plan Version
	WECC2012009492	EOP-005-1 R2	05/03/2012	1

Mitigation Plan Submitted On: August 06, 2012

Mitigation Plan Accepted On:

Mitigation Plan Proposed Completion Date: September 30, 2012

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by MILW On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Section A: Compliance Notices

Section 6.2 of the NERC 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 B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Section B: Registered Entity Information

B.1 Identify your organization:

Entity Name: Milford Wind Corridor Phase I, LLC
NERC Compliance Registry ID: NCR10394
Address: 179 Lincoln St.
Suite 500
Boston MA 02111

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

Name: Hallie Flint Gilman
Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance
Email: regulatory@firstwind.com
Phone: 207-228-6887

Section C: Identification of Reliability Standard Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2012009492	01/20/2012	EOP-005-1 R2
Each Transmission Operator shall review and update its restoration plan at least annually and whenever it makes changes in the power system network, and shall correct deficiencies found during the simulated restoration exercises.		

C.2 Brief summary including the cause of the violation(s) and mechanism in which it was identified above:

On January 20, 2012, Milford self-certified potential noncompliance with EOP-005-1 R2. At the time, Milford did not have an emergency restoration plan as required by EOP-005-1 R1. This lack of an emergency restoration plan was the cause of the potential noncompliance with EOP-005-1 R2.

It should be noted that Milford's registration as a TO and TOP was appealed to and pending before FERC for several months, including in January 2012 when the self-certification was required. Until June 13, 2012, Milford's registration status and the applicability of specific reliability requirements were in question due to Milford's appeal of the registration of its generator lead facilities as a TO/TOP. Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,214 (2012).

C.3 Provide any relevant information regarding the identification of the violation(s) associated with this Mitigation Plan:

Despite the fact that Milford's registration status and the applicability of specific reliability requirements were in question, and even though FERC had yet to rule on the applicability of those requirements to Milford, Milford has diligently worked toward compliance with the reliability standards requirements set forth in the Compliance Filing of the North American Electric Reliability Corporation, FERC Docket Nos. RC11-1-000 and RC11-2-000 (December 12, 2011). Milford submitted its January 2012 self-certifications as if the listing of requirements in that compliance filing was final, and it candidly identified areas in which it would need to implement processes and procedures in order to satisfy the relevant requirements, referencing the registration appeal in the comments section to each self-certification.

Section D: Details of Proposed Mitigation Plan

- 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 violation(s) identified above in Section C.1 of this form:

Milford is currently in the process of developing an emergency restoration plan and will have adopted such a plan by September 30, 2012. This emergency restoration plan will provide for an annual review, periodic testing of necessary telecommunications facilities, training of operating personnel, and verification of the restoration procedure by actual testing or simulation.

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

Proposed Completion date of Mitigation Plan: September 30, 2012

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

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date
Adopt emergency restoration plan	Adopt emergency restoration plan	09/30/2012	

- D.4 Additional Relevant Information (Optional)

Section E: Interim and Future Reliability Risk

E.1 Abatement of Interim BPS Reliability Risk

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

As WECC has assessed in the June 13, 2012 Notice of Alleged Violation, these alleged violations posed minimal risk to the BES given the nature of Milford's facilities and operations: Milford's is an intermittent resource, its generator lead facilities are limited in use and Milford's BA has adequate provisions in place to cover generation unavailability. Because Milford's generation is not baseload and could be replaced by the BA, there is minimal risk to the BES while the Mitigation Plan is being implemented.

E.2 Prevention of Future BPS Reliability Risk

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

Milford's development and implementation of its emergency restoration as described above will prevent recurrence of the alleged violation.

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

Milford's development and implementation of its emergency restoration plan, adopted pursuant to the mitigation plan for EOP-005-1 R1, will support mitigation of any risks related to EOP-005-1 R2.

Section F: Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

(a) Submits the Mitigation Plan, as laid out in Section D, to the Regional Entity for acceptance 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 Assoc. General Counsel, Dir. of Electric Regulatory Compliance of Milford Wind Corridor Phase I,
2. I am qualified to sign this Mitigation Plan on behalf of Milford Wind Corridor Phase I, LLC
3. I have read and understand Milford Wind Corridor Phase I, LLC's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure and the NERC CMEP currently in effect or the NERC CMEP-Province of Manitoba, Schedule B currently in effect, whichever is applicable.
4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
5. Milford Wind Corridor Phase I, LLC Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authorities in Canada.

Authorized Individual Signature: _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Authorized On: August 06, 2012

Certification of Mitigation Plan Completion

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

Registered Entity Name: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

NERC Violation ID(s): WECC2012009492

Mitigated Standard Requirement(s): EOP-005-1 R2,

Scheduled Completion as per Accepted Mitigation Plan: September 30, 2012

Date Mitigation Plan completed: September 17, 2012

WECC Notified of Completion on Date: October 02, 2012

Entity Comment: Please see entity document OP-700-365=008.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	OP-700-365-008_MIL_System Restoration Plan_1 0.pdf		4,740,402

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Email: hgilman@firstwind.com

Phone:

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

CONFIDENTIAL



Chris Luras
Director of Enforcement

(801) 883-6887
cluras@wecc.biz

VIA WECC ENHANCED FILE TRANSFER SERVER

October 25, 2012

Hallie Gilman
Associate General Counsel
Milford Wind Corridor Phase I, LLC
Boston, MA 2111

NERC Registration ID: NCR10394
NERC Violation ID: WECC2012009492

Subject: Notice of Completed Mitigation Plan Acceptance
Reliability Standard EOP-005-1 Requirement 2

Hallie,

The Western Electricity Coordinating Council (WECC) received the Certification of Mitigation Plan Completion submitted by Milford Wind Corridor Phase I, LLC (MILW) on October 2, 2012 for the violation of Reliability Standard EOP-005-1 Requirement 2. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

If you have any questions or concerns, please contact SME at SME@wecc.biz.

Sincerely,



Chris Luras
Director of Enforcement

CL:dlc

cc: Keshav Sarin, WECC Manager, O&P and CIP

Attachment Y

Record documents for the violation of EOP-005-1 R5:

e-1. MILW's Mitigation Plan designated as WECCMIT007819 submitted August 6, 2012

e-2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012

e-3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012

Mitigation Plan

Registered Entity: Milford Wind Corridor Phase I, LLC

Mit Plan Code	NERC Violation ID	Requirement	Violation Validated On	Mit Plan Version
	WECC2012009480	EOP-005-1 R5	03/13/2012	1

Mitigation Plan Submitted On: August 06, 2012

Mitigation Plan Accepted On:

Mitigation Plan Proposed Completion Date: September 30, 2012

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by MILW On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Section A: Compliance Notices

Section 6.2 of the NERC 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 B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Section B: Registered Entity Information

B.1 Identify your organization:

Entity Name: Milford Wind Corridor Phase I, LLC
NERC Compliance Registry ID: NCR10394
Address: 179 Lincoln St.
Suite 500
Boston MA 02111

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

Name: Hallie Flint Gilman
Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance
Email: regulatory@firstwind.com
Phone: 207-228-6887

Section C: Identification of Reliability Standard Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2012009480	01/20/2012	EOP-005-1 R5
Each Transmission Operator and Balancing Authority shall periodically test its telecommunication facilities needed to implement the restoration plan.		

C.2 Brief summary including the cause of the violation(s) and mechanism in which it was identified above:

On January 20, 2012, Milford self-certified potential noncompliance with the above-listed requirements. At the time, Milford did not have an emergency restoration plan as required by EOP-005-1 R1. This lack of an emergency restoration plan was the cause of the potential noncompliance with EOP-005-1 R5.

It should be noted that Milford's registration as a TO and TOP was appealed to and pending before FERC for several months, including in January 2012 when the self-certification was required. Until June 13, 2012, Milford's registration status and the applicability of specific reliability requirements were in question due to Milford's appeal of the registration of its generator lead facilities as a TO/TOP. Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,214 (2012).

C.3 Provide any relevant information regarding the identification of the violation(s) associated with this Mitigation Plan:

Despite the fact that Milford's registration status and the applicability of specific reliability requirements were in question, and even though FERC had yet to rule on the applicability of those requirements to Milford, Milford has diligently worked toward compliance with the reliability standards requirements set forth in the Compliance Filing of the North American Electric Reliability Corporation, FERC Docket Nos. RC11-1-000 and RC11-2-000 (December 12, 2011). Milford submitted its January 2012 self-certifications as if the listing of requirements in that compliance filing was final, and it candidly identified areas in which it would need to implement processes and procedures in order to satisfy the relevant requirements, referencing the registration appeal in the comments section to each self-certification.

Section D: Details of Proposed Mitigation Plan

- 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 violation(s) identified above in Section C.1 of this form:

Milford is currently in the process of developing an emergency restoration plan and will have adopted such a plan by September 30, 2012. This emergency restoration plan will provide for an annual review, periodic testing of necessary telecommunications facilities, training of operating personnel, and verification of the restoration procedure by actual testing or simulation.

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

Proposed Completion date of Mitigation Plan: September 30, 2012

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

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date
Adopt emergency restoration plan	Adopt emergency restoration plan	09/30/2012	

- D.4 Additional Relevant Information (Optional)

Section E: Interim and Future Reliability Risk

E.1 Abatement of Interim BPS Reliability Risk

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

As WECC has assessed in the June 13, 2012 Notice of Alleged Violation, these alleged violations posed minimal risk to the BES given the nature of Milford's facilities and operations: Milford's is an intermittent resource, its generator lead facilities are limited in use and Milford's BA has adequate provisions in place to cover generation unavailability. Because Milford's generation is not baseload and could be replaced by the BA, there is minimal risk to the BES while the Mitigation Plan is being implemented.

E.2 Prevention of Future BPS Reliability Risk

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

Milford's development and implementation of its emergency restoration as described above will prevent recurrence of the alleged violations.

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

Milford's development and implementation of its emergency restoration plan, adopted pursuant to the mitigation plan for EOP-005-1 R1, will support mitigation of any risks related to EOP-005-1 R5.

Section F: Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

(a) Submits the Mitigation Plan, as laid out in Section D, to the Regional Entity for acceptance 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 Assoc. General Counsel, Dir. of Electric Regulatory Compliance of Milford Wind Corridor Phase I,
2. I am qualified to sign this Mitigation Plan on behalf of Milford Wind Corridor Phase I, LLC
3. I have read and understand Milford Wind Corridor Phase I, LLC's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure and the NERC CMEP currently in effect or the NERC CMEP-Province of Manitoba, Schedule B currently in effect, whichever is applicable.
4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
5. Milford Wind Corridor Phase I, LLC Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authorities in Canada.

Authorized Individual Signature: _____
(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Authorized On: August 06, 2012

Certification of Mitigation Plan Completion

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

Registered Entity Name: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

NERC Violation ID(s): WECC2012009480

Mitigated Standard Requirement(s): EOP-005-1 R5,

Scheduled Completion as per Accepted Mitigation Plan: September 30, 2012

Date Mitigation Plan completed: September 17, 2012

WECC Notified of Completion on Date: October 02, 2012

Entity Comment: Please see entity document OP-700-365-008.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	OP-700-365-008_MIL_System Restoration Plan_1 0.pdf		4,740,402

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Email: hgilman@firstwind.com

Phone:

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

CONFIDENTIAL



Chris Luras
Director of Enforcement

(801) 883-6887
cluras@wecc.biz

VIA WECC ENHANCED FILE TRANSFER SERVER

October 25, 2012

Hallie Gilman
Associate General Counsel
Milford Wind Corridor Phase I, LLC
Boston, MA 2111

NERC Registration ID: NCR10394
NERC Violation ID: WECC2012009480

Subject: Notice of Completed Mitigation Plan Acceptance
Reliability Standard EOP-005-1 Requirement 5

Hallie,

The Western Electricity Coordinating Council (WECC) received the Certification of Mitigation Plan Completion submitted by Milford Wind Corridor Phase I, LLC (MILW) on October 2, 2012 for the violation of Reliability Standard EOP-005-1 Requirement 5. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

If you have any questions or concerns, please contact SME at SME@wecc.biz.

Sincerely,

A handwritten signature in blue ink, appearing to read "CL", is placed above the typed name of the sender.

Chris Luras
Director of Enforcement

CL:dlc
cc: Keshav Sarin, WECC Manager, O&P and CIP

Attachment f

Record documents for the violation of EOP-005-1 R6:

f-1. MILW's Mitigation Plan designated as WECCMIT007820 submitted August 6, 2012

f-2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012

f-3. WECC's Verification of Mitigation Plan Completion dated November 14, 2012

Mitigation Plan

Registered Entity: Milford Wind Corridor Phase I, LLC

Mit Plan Code	NERC Violation ID	Requirement	Violation Validated On	Mit Plan Version
	WECC2012009481	EOP-005-1 R6	03/12/2012	1

Mitigation Plan Submitted On: August 06, 2012

Mitigation Plan Accepted On:

Mitigation Plan Proposed Completion Date: September 30, 2012

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by MILW On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Section A: Compliance Notices

Section 6.2 of the NERC 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 B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Section B: Registered Entity Information

B.1 Identify your organization:

Entity Name: Milford Wind Corridor Phase I, LLC
NERC Compliance Registry ID: NCR10394
Address: 179 Lincoln St.
Suite 500
Boston MA 02111

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

Name: Hallie Flint Gilman
Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance
Email: regulatory@firstwind.com
Phone: 207-228-6887

Section C: Identification of Reliability Standard Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2012009481	01/20/2012	EOP-005-1 R6
Each Transmission Operator and Balancing Authority shall train its operating personnel in the implementation of the restoration plan. Such training shall include simulated exercises, if practicable.		

C.2 Brief summary including the cause of the violation(s) and mechanism in which it was identified above:

On January 20, 2012, Milford self-certified potential noncompliance with the above-listed requirements. At the time, Milford did not have an emergency restoration plan as required by EOP-005-1 R1. This lack of an emergency restoration plan was the cause of the potential noncompliance with EOP-005-1 R6.

It should be noted that Milford's registration as a TO and TOP was appealed to and pending before FERC for several months, including in January 2012 when the self-certification was required. Until June 13, 2012, Milford's registration status and the applicability of specific reliability requirements were in question due to Milford's appeal of the registration of its generator lead facilities as a TO/TOP. Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,214 (2012).

C.3 Provide any relevant information regarding the identification of the violation(s) associated with this Mitigation Plan:

Despite the fact that Milford's registration status and the applicability of specific reliability requirements were in question, and even though FERC had yet to rule on the applicability of those requirements to Milford, Milford has diligently worked toward compliance with the reliability standards requirements set forth in the Compliance Filing of the North American Electric Reliability Corporation, FERC Docket Nos. RC11-1-000 and RC11-2-000 (December 12, 2011). Milford submitted its January 2012 self-certifications as if the listing of requirements in that compliance filing was final, and it candidly identified areas in which it would need to implement processes and procedures in order to satisfy the relevant requirements, referencing the registration appeal in the comments section to each self-certification.

Section D: Details of Proposed Mitigation Plan

- 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 violation(s) identified above in Section C.1 of this form:

Milford is currently in the process of developing an emergency restoration plan and will have adopted such a plan by September 30, 2012. This emergency restoration plan will provide for an annual review, periodic testing of necessary telecommunications facilities, training of operating personnel, and verification of the restoration procedure by actual testing or simulation.

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

Proposed Completion date of Mitigation Plan: September 30, 2012

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

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date
Adopt emergency restoration plan	Adopt emergency restoration plan	09/30/2012	

- D.4 Additional Relevant Information (Optional)

Section E: Interim and Future Reliability Risk

E.1 Abatement of Interim BPS Reliability Risk

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

As WECC has assessed in the June 13, 2012 Notice of Alleged Violation, these alleged violations posed minimal risk to the BES given the nature of Milford's facilities and operations: Milford's is an intermittent resource, its generator lead facilities are limited in use and Milford's BA has adequate provisions in place to cover generation unavailability. Because Milford's generation is not baseload and could be replaced by the BA, there is minimal risk to the BES while the Mitigation Plan is being implemented.

E.2 Prevention of Future BPS Reliability Risk

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

Milford's development and implementation of its emergency restoration plan as described above will prevent recurrence of the alleged violations.

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

Milford's development and implementation of its emergency restoration plan, adopted pursuant to the mitigation plan for EOP-005-1 R1, will support mitigation of any risks related to EOP-005-1 R6.

Section F: Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

(a) Submits the Mitigation Plan, as laid out in Section D, to the Regional Entity for acceptance 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 Assoc. General Counsel, Dir. of Electric Regulatory Compliance of Milford Wind Corridor Phase I,
2. I am qualified to sign this Mitigation Plan on behalf of Milford Wind Corridor Phase I, LLC
3. I have read and understand Milford Wind Corridor Phase I, LLC's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure and the NERC CMEP currently in effect or the NERC CMEP-Province of Manitoba, Schedule B currently in effect, whichever is applicable.
4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
5. Milford Wind Corridor Phase I, LLC Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authorities in Canada.

Authorized Individual Signature: _____
(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Authorized On: August 06, 2012

Certification of Mitigation Plan Completion

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

Registered Entity Name: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

NERC Violation ID(s): WECC2012009481

Mitigated Standard Requirement(s): EOP-005-1 R6,

Scheduled Completion as per Accepted Mitigation Plan: September 30, 2012

Date Mitigation Plan completed: September 17, 2012

WECC Notified of Completion on Date: October 02, 2012

Entity Comment: Please see entity document OP-700-365-008.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	OP-700-365-008_MIL_System Restoration Plan_1 0.pdf		4,740,402

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Email: hgilman@firstwind.com

Phone:

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

CONFIDENTIAL



Chris Luras
Director of Enforcement

(801) 883-6887
cluras@wecc.biz

VIA WECC ENHANCED FILE TRANSFER SERVER

November 14, 2012

Hallie Gilman
Associate General Counsel
Milford Wind Corridor Phase I, LLC
179 Lincoln St.
Suite 500
Boston, MA 2111

NERC Registration ID: NCR10394
NERC Violation ID: WECC2012009481

Subject: Notice of Completed Mitigation Plan Acceptance
Reliability Standard EOP-005-1 Requirement 6

Hallie,

The Western Electricity Coordinating Council (WECC) received the Certification of Mitigation Plan Completion submitted by Milford Wind Corridor Phase I, LLC (MILW) on October 2, 2012 for the violation of Reliability Standard EOP-005-1 Requirement 6. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

If you have any questions or concerns, please contact Keshav Sarin at ksarin@wecc.biz.

Sincerely,

A handwritten signature in blue ink, appearing to read "CL", is placed above the name and title of the sender.

Chris Luras
Director of Enforcement

CL:dlc

cc: Keshav Sarin, WECC Manager, O&P and CIP

Attachment g

Record documents for the violation of EOP-005-1 R7:

g-1. MILW's Mitigation Plan designated as WECCMIT007821 submitted August 6, 2012

g-2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012

g-3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012

Mitigation Plan

Registered Entity: Milford Wind Corridor Phase I, LLC

Mit Plan Code	NERC Violation ID	Requirement	Violation Validated On	Mit Plan Version
	WECC2012009482	EOP-005-1 R7	03/13/2012	1

Mitigation Plan Submitted On: August 06, 2012

Mitigation Plan Accepted On:

Mitigation Plan Proposed Completion Date: September 30, 2012

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by MILW On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Section A: Compliance Notices

Section 6.2 of the NERC 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 B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Section B: Registered Entity Information

B.1 Identify your organization:

Entity Name: Milford Wind Corridor Phase I, LLC
NERC Compliance Registry ID: NCR10394
Address: 179 Lincoln St.
Suite 500
Boston MA 02111

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

Name: Hallie Flint Gilman
Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance
Email: regulatory@firstwind.com
Phone: 207-228-6887

Section C: Identification of Reliability Standard Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2012009482	01/20/2012	EOP-005-1 R7
Each Transmission Operator and Balancing Authority shall verify the restoration procedure by actual testing or by simulation.		

C.2 Brief summary including the cause of the violation(s) and mechanism in which it was identified above:

listed requirements. At the time, Milford did not have an emergency restoration plan as required by EOP-005-1 R1. This lack of an emergency restoration plan was the cause of the potential noncompliance with EOP-005-1 R7.

It should be noted that Milford's registration as a TO and TOP was appealed to and pending before FERC for several months, including in January 2012 when the self-certification was required. Until June 13, 2012, Milford's registration status and the applicability of specific reliability requirements were in question due to Milford's appeal of the registration of its generator lead facilities as a TO/TOP. Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,214 (2012).

C.3 Provide any relevant information regarding the identification of the violation(s) associated with this Mitigation Plan:

Despite the fact that Milford's registration status and the applicability of specific reliability requirements were in question, and even though FERC had yet to rule on the applicability of these requirements to Milford, Milford has diligently worked toward compliance with the reliability standards requirements set forth in the Compliance Filing of the North American Electric Reliability Corporation, FERC Docket Nos. RC11-1-000 and RC11-2-000 (December 12, 2011). Milford submitted its January 2012 self-certifications as if the listing of requirements in that compliance filing was final, and it candidly identified areas in which it would need to implement processes and procedures in order to satisfy the relevant requirements, referencing the registration appeal in the comments section to each self-certification.

Section D: Details of Proposed Mitigation Plan

- 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 violation(s) identified above in Section C.1 of this form:

Milford is currently in the process of developing an emergency restoration plan and will have adopted such a plan by September 30, 2012. This emergency restoration plan will provide for an annual review, periodic testing of necessary telecommunications facilities, training of operating personnel, and verification of the restoration procedure by actual testing or simulation.

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

Proposed Completion date of Mitigation Plan: September 30, 2012

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

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date
Adopt emergency restoration plan	Adopt emergency restoration plan	09/30/2012	

- D.4 Additional Relevant Information (Optional)

Section E: Interim and Future Reliability Risk

E.1 Abatement of Interim BPS Reliability Risk

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

As WECC has assessed in the June 13, 2012 Notice of Alleged Violation, these alleged violations posed minimal risk to the BES given the nature of Milford's facilities and operations: Milford's is an intermittent resource, its generator lead facilities are limited in use and Milford's BA has adequate provisions in place to cover generation unavailability. Because Milford's generation is not baseload and could be replaced by the BA, there is minimal risk to the BES while the Mitigation Plan is being implemented.

E.2 Prevention of Future BPS Reliability Risk

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

Milford's development and implementation of its emergency restoration plan as described above will prevent recurrence of the alleged violations.

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

Milford's development and implementation of its emergency restoration plan, adopted pursuant to the mitigation plan for EOP-005-1 R1, will support mitigation of any risks related to EOP-005-1 R7.

Section F: Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

(a) Submits the Mitigation Plan, as laid out in Section D, to the Regional Entity for acceptance 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 Assoc. General Counsel, Dir. of Electric Regulatory Compliance of Milford Wind Corridor Phase I,
2. I am qualified to sign this Mitigation Plan on behalf of Milford Wind Corridor Phase I, LLC
3. I have read and understand Milford Wind Corridor Phase I, LLC's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure and the NERC CMEP currently in effect or the NERC CMEP-Province of Manitoba, Schedule B currently in effect, whichever is applicable.
4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
5. Milford Wind Corridor Phase I, LLC Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authorities in Canada.

Authorized Individual Signature: _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Authorized On: August 06, 2012

Certification of Mitigation Plan Completion

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

Registered Entity Name: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

NERC Violation ID(s): WECC2012009482

Mitigated Standard Requirement(s): EOP-005-1 R7,

Scheduled Completion as per Accepted Mitigation Plan: September 30, 2012

Date Mitigation Plan completed: September 17, 2012

WECC Notified of Completion on Date: October 02, 2012

Entity Comment: Please see entity document OP-700-365-008.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	OP-700-365-008_MIL_System Restoration Plan_1 0.pdf		4,740,402

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Email: hgilman@firstwind.com

Phone:

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

CONFIDENTIAL



Chris Luras
Director of Enforcement

(801) 883-6887
cluras@wecc.biz

VIA WECC ENHANCED FILE TRANSFER SERVER

October 25, 2012

Hallie Gilman
Associate General Counsel
Milford Wind Corridor Phase I, LLC
Boston, MA 2111

NERC Registration ID: NCR10394
NERC Violation ID: WECC2012009482

Subject: Notice of Completed Mitigation Plan Acceptance
Reliability Standard EOP-005-1 Requirement 7

Hallie,

The Western Electricity Coordinating Council (WECC) received the Certification of Mitigation Plan Completion submitted by Milford Wind Corridor Phase I, LLC (MILW) on October 2, 2012 for the violation of Reliability Standard EOP-005-1 Requirement 7. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

If you have any questions or concerns, please contact SME at SME@wecc.biz.

Sincerely,

A handwritten signature in blue ink, appearing to be "CL", is written over a light blue circular stamp or watermark.

Chris Luras
Director of Enforcement

CL:dlc

cc: Keshav Sarin, WECC Manager, O&P and CIP

Attachment h

Record documents for the violation of FAC-001-0 R1:

h-1. MILW's Mitigation Plan designated as WECCMIT007822 submitted August 6, 2012

h-2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012

h-3. WECC's Verification of Mitigation Plan Completion dated November 14, 2012

Mitigation Plan

Registered Entity: Milford Wind Corridor Phase I, LLC

Mit Plan Code	NERC Violation ID	Requirement	Violation Validated On	Mit Plan Version
	WECC2012009485	FAC-001-0 R1	03/14/2012	1

Mitigation Plan Submitted On: August 06, 2012

Mitigation Plan Accepted On:

Mitigation Plan Proposed Completion Date: March 15, 2012

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by MILW On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Section A: Compliance Notices

Section 6.2 of the NERC 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 B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Section B: Registered Entity Information

B.1 Identify your organization:

Entity Name: Milford Wind Corridor Phase I, LLC
NERC Compliance Registry ID: NCR10394
Address: 179 Lincoln St.
Suite 500
Boston MA 02111

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

Name: Hallie Flint Gilman
Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance
Email: regulatory@firstwind.com
Phone: 207-228-6887

Section C: Identification of Reliability Standard Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2012009485	01/20/2012	FAC-001-0 R1
The Transmission Owner shall document, maintain, and publish facility connection requirements to ensure compliance with NERC Reliability Standards and applicable Regional Reliability Organization, subregional, Power Pool, and individual Transmission Owner planning criteria and facility connection requirements. The Transmission Owner's facility connection requirements shall address connection requirements for:		

C.2 Brief summary including the cause of the violation(s) and mechanism in which it was identified above:

On January 20, 2012, Milford self-certified potential noncompliance with the above-listed requirements. At the time, Milford did not have documented facility connection requirements as required by FAC-001-0 R1. This lack of documented interconnection requirements was the cause of the potential noncompliance with FAC-001-0 R1.

It should be noted that Milford's registration as a TO and TOP was appealed to and pending before FERC for several months, including January 2012 when the self-certification was required. Until June 13, 2012, Milford's registration status and the applicability of specific reliability requirements were in question due to Milford's appeal of the registration of its generator lead facilities as a TO/TOP. Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,214 (2012).

C.3 Provide any relevant information regarding the identification of the violation(s) associated with this Mitigation Plan:

Despite the fact that Milford's registration status and the applicability of specific reliability requirements were in question, and even though FERC had yet to rule on the applicability of those requirements to Milford, Milford has diligently worked toward compliance with the reliability standards requirements set forth in the Compliance Filing of the North American Electric Reliability Corporation, FERC Docket Nos. RC11-1-000 and RC11-2-000 (December 12, 2011). Milford submitted its January 2012 self-certifications as if the listing of requirements in that compliance filing was final, and it candidly identified areas in which it would need to implement processes and procedures in order to satisfy the relevant requirements, referencing the registration appeal in the comments section to each self-certification.

Section D: Details of Proposed Mitigation Plan

- 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 violation(s) identified above in Section C.1 of this form:

Milford adopted documented facility connection requirements on March 15, 2012. These documented facility connection requirements provide for interconnection of generation, transmission, and end user facilities in accordance with compliance with NERC Reliability Standards and applicable Regional Reliability Organization, subregional, Power Pool, and Milford's own planning criteria and facility connection requirement, and they address the items outlined in FAC-001-0 R2.

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

Proposed Completion date of Mitigation Plan: March 15, 2012

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

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date
Adopt documented facility connection requirements for generation facilities	Adopt documented facility connection requirements for generation facilities	03/15/2012	
Adopt documented facility connection requirements for transmission facilities	Adopt documented facility connection requirements for transmission facilities	03/15/2012	
Adopt documented facility connection requirements for end-user facilities	Adopt documented facility connection requirements for end-user facilities	03/15/2012	

- D.4 Additional Relevant Information (Optional)

Section E: Interim and Future Reliability Risk**E.1 Abatement of Interim BPS Reliability Risk**

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

As WECC has assessed in the June 13, 2012 Notice of Alleged Violation, these alleged violations posed minimal risk to the BES given the technical nature of Milford's facilities and operations: Milford's is an intermittent resource, its generator lead facilities are limited in use and Milford's BA has adequate provisions in place to cover generation unavailability. Because Milford's generation is not baseload and could be replaced by the BA, there was minimal risk to the BES while the Mitigation Plan was being implemented.

E.2 Prevention of Future BPS Reliability Risk

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

Milford's adoption of documented facility connection requirements as described above will prevent recurrence of the alleged violations.

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

Section F: Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

(a) Submits the Mitigation Plan, as laid out in Section D, to the Regional Entity for acceptance 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 Assoc. General Counsel, Dir. of Electric Regulatory Compliance of Milford Wind Corridor Phase I,
2. I am qualified to sign this Mitigation Plan on behalf of Milford Wind Corridor Phase I, LLC
3. I have read and understand Milford Wind Corridor Phase I, LLC's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure and the NERC CMEP currently in effect or the NERC CMEP-Province of Manitoba, Schedule B currently in effect, whichever is applicable.
4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
5. Milford Wind Corridor Phase I, LLC Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authorities in Canada.

Authorized Individual Signature: _____
(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Authorized On: August 06, 2012

Certification of Mitigation Plan Completion

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

Registered Entity Name: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

NERC Violation ID(s): WECC2012009485

Mitigated Standard Requirement(s): FAC-001-0 R1,

Scheduled Completion as per Accepted Mitigation Plan: March 15, 2012

Date Mitigation Plan completed: March 15, 2012

WECC Notified of Completion on Date: October 02, 2012

Entity Comment: Please see entity document OP-700-365-007.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	OP-700-365-007 Milford Connection Requirements.pdf		262,117

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Email: hgilman@firstwind.com

Phone:

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

CONFIDENTIAL



Chris Luras
Director of Enforcement

(801) 883-6887
cluras@wecc.biz

VIA WECC ENHANCED FILE TRANSFER SERVER

November 14, 2012

Hallie Gilman
Associate General Counsel
Milford Wind Corridor Phase I, LLC
179 Lincoln St.
Suite 500
Boston, MA 2111

NERC Registration ID: NCR10394
NERC Violation ID: WECC2012009485

Subject: Notice of Completed Mitigation Plan Acceptance
Reliability Standard FAC-001-0 Requirement 1

Hallie,

The Western Electricity Coordinating Council (WECC) received the Certification of Mitigation Plan Completion submitted by Milford Wind Corridor Phase I, LLC (MILW) on October 2, 2012 for the violation of Reliability Standard FAC-001-0 Requirement 1. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

If you have any questions or concerns, please contact Keshav Sarin at ksarin@wecc.biz.

Sincerely,

A handwritten signature in blue ink, appearing to read "CL", is placed above the name and title of the sender.

Chris Luras
Director of Enforcement

CL:dlc

cc: Keshav Sarin, WECC Manager, O&P and CIP

Attachment i

Record documents for the violation of FAC-001-0 R2:

- i-1. MILW's Mitigation Plan designated as WECCMIT007823 submitted August 6, 2012**
 - i-2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012**
 - i-3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012**
-

Mitigation Plan

Registered Entity: Milford Wind Corridor Phase I, LLC

Mit Plan Code	NERC Violation ID	Requirement	Violation Validated On	Mit Plan Version
	WECC2012009486	FAC-001-0 R2	03/14/2012	1

Mitigation Plan Submitted On: August 06, 2012

Mitigation Plan Accepted On:

Mitigation Plan Proposed Completion Date: March 15, 2012

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by MILW On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Section A: Compliance Notices

Section 6.2 of the NERC 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 B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Section B: Registered Entity Information

B.1 Identify your organization:

Entity Name: Milford Wind Corridor Phase I, LLC
NERC Compliance Registry ID: NCR10394
Address: 179 Lincoln St.
Suite 500
Boston MA 02111

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

Name: Hallie Flint Gilman
Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance
Email: regulatory@firstwind.com
Phone: 207-228-6887

Section C: Identification of Reliability Standard Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2012009486	01/20/2012	FAC-001-0 R2
The Transmission Owner's facility connection requirements shall address, but are not limited to, the following items:		

C.2 Brief summary including the cause of the violation(s) and mechanism in which it was identified above:

On January 20, 2012, Milford self-certified potential noncompliance with the above-listed requirements. At the time, Milford did not have documented facility connection requirements as required by FAC-001-0 R1. This lack of documented interconnection requirements was the cause of the potential noncompliance with FAC-001-0 R2.

It should be noted that Milford's registration as a TO and TOP was appealed to and pending before FERC for several months, including January 2012 when the self-certification was required. Until June 13, 2012, Milford's registration status and the applicability of specific reliability requirements were in question due to Milford's appeal of the registration of its generator lead facilities as a TO/TOP. Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,214 (2012).

C.3 Provide any relevant information regarding the identification of the violation(s) associated with this Mitigation Plan:

Despite the fact that Milford's registration status and the applicability of specific reliability requirements were in question, and even though FERC had yet to rule on the applicability of those requirements to Milford, Milford has diligently worked toward compliance with the reliability standards requirements set forth in the Compliance Filing of the North American Electric Reliability Corporation, FERC Docket Nos. RC11-1-000 and RC11-2-000 (December 12, 2011). Milford submitted its January 2012 self-certifications as if the listing of requirements in that compliance filing was final, and it candidly identified areas in which it would need to implement processes and procedures in order to satisfy the relevant requirements, referencing the registration appeal in the comments section to each self-certification.

Section D: Details of Proposed Mitigation Plan

- 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 violation(s) identified above in Section C.1 of this form:

Milford adopted documented facility connection requirements on March 15, 2012. These documented facility connection requirements provide for interconnection of generation, transmission, and end user facilities in accordance with compliance with NERC Reliability Standards and applicable Regional Reliability Organization, subregional, Power Pool, and Milford's own planning criteria and facility connection requirement, and they address the items outlined in FAC-001-0 R2.

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

Proposed Completion date of Mitigation Plan: March 15, 2012

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

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date
Adopt documented facility connection requirements for generation facilities	Adopt documented facility connection requirements for generation facilities	03/15/2012	
Adopt documented facility connection requirements for transmission facilities	Adopt documented facility connection requirements for transmission facilities	03/15/2012	
Adopt documented facility connection requirements for end-user facilities	Adopt documented facility connection requirements for end-user facilities	03/15/2012	

- D.4 Additional Relevant Information (Optional)

Section E: Interim and Future Reliability Risk

E.1 Abatement of Interim BPS Reliability Risk

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

As WECC has assessed in the June 13, 2012 Notice of Alleged Violation, these alleged violations posed minimal risk to the BES given the technical nature of Milford's facilities and operations: Milford's is an intermittent resource, its generator lead facilities are limited in use and Milford's BA has adequate provisions in place to cover generation unavailability. Because Milford's generation is not baseload and could be replaced by the BA, there was minimal risk to the BES while the Mitigation Plan was being implemented.

E.2 Prevention of Future BPS Reliability Risk

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

Milford's adoption of documented facility connection requirements as described above will prevent recurrence of the alleged violations.

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

Milford's adoption of documented facility connection requirements, pursuant to the mitigation plan for FAC-001-0 R1, will support mitigation for any risks related to FAC-001-0 R2.

Section F: Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

(a) Submits the Mitigation Plan, as laid out in Section D, to the Regional Entity for acceptance 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 Assoc. General Counsel, Dir. of Electric Regulatory Compliance of Milford Wind Corridor Phase I,
2. I am qualified to sign this Mitigation Plan on behalf of Milford Wind Corridor Phase I, LLC
3. I have read and understand Milford Wind Corridor Phase I, LLC's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure and the NERC CMEP currently in effect or the NERC CMEP-Province of Manitoba, Schedule B currently in effect, whichever is applicable.
4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
5. Milford Wind Corridor Phase I, LLC Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authorities in Canada.

Authorized Individual Signature: _____
(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Authorized On: August 06, 2012

Certification of Mitigation Plan Completion

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

Registered Entity Name: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

NERC Violation ID(s): WECC2012009486

Mitigated Standard Requirement(s): FAC-001-0 R2,

Scheduled Completion as per Accepted Mitigation Plan: March 15, 2012

Date Mitigation Plan completed: March 15, 2012

WECC Notified of Completion on Date: October 02, 2012

Entity Comment: Please see entity document OP-700-365-007.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	OP-700-365-007 Milford Connection Requirements.pdf		262,117

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Email: regulatory@firstwind.com

Phone: 1 (207) 228-6887

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

CONFIDENTIAL



Chris Luras
Director of Enforcement

(801) 883-6887
cluras@wecc.biz

VIA WECC ENHANCED FILE TRANSFER SERVER

October 25, 2012

Hallie Gilman
Associate General Counsel
Milford Wind Corridor Phase I, LLC
Boston, MA 2111

NERC Registration ID: NCR10394
NERC Violation ID: WECC2012009486

Subject: Notice of Completed Mitigation Plan Acceptance
Reliability Standard FAC-001-0 Requirement 2

Hallie,

The Western Electricity Coordinating Council (WECC) received the Certification of Mitigation Plan Completion submitted by Milford Wind Corridor Phase I, LLC (MILW) on October 2, 2012 for the violation of Reliability Standard FAC-001-0 Requirement 2. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

If you have any questions or concerns, please contact SME at SME@wecc.biz.

Sincerely,

A handwritten signature in blue ink, appearing to be "CL", is written over a light blue circular stamp or watermark.

Chris Luras
Director of Enforcement

CL:dlc
cc: Keshav Sarin, WECC Manager, O&P and CIP

Attachment j

Record documents for the violation of FAC-003-1 R1:

j-1. MILW's Mitigation Plan designated as WECCMIT007824 submitted August 6, 2012

j-2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012

j-3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012

Mitigation Plan

Registered Entity: Milford Wind Corridor Phase I, LLC

Mit Plan Code	NERC Violation ID	Requirement	Violation Validated On	Mit Plan Version
	WECC2012009488	FAC-003-1 R1	03/14/2012	1

Mitigation Plan Submitted On: August 06, 2012

Mitigation Plan Accepted On:

Mitigation Plan Proposed Completion Date: April 25, 2012

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by MILW On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Section A: Compliance Notices

Section 6.2 of the NERC 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 B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Section B: Registered Entity Information

B.1 Identify your organization:

Entity Name: Milford Wind Corridor Phase I, LLC
NERC Compliance Registry ID: NCR10394
Address: 179 Lincoln St.
Suite 500
Boston MA 02111

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

Name: Hallie Flint Gilman
Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance
Email: regulatory@firstwind.com
Phone: 207-228-6887

Section C: Identification of Reliability Standard Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2012009488	01/20/2012	FAC-003-1 R1
The Transmission Owner shall prepare, and keep current, a formal transmission vegetation management program (TVMP). The TVMP shall include the Transmission Owner's objectives, practices, approved procedures, and work specifications (ANSI A300, Tree Care Operations - Tree, Shrub, and Other Woody Plant Maintenance - Standard Practices, while not a requirement of this standard, is considered to be an industry best practice.).		

C.2 Brief summary including the cause of the violation(s) and mechanism in which it was identified above:

On January 20, 2012, Milford self-certified potential noncompliance with the above-listed requirements. At the time, Milford did not have a formal transmission vegetation management program as required by FAC-003-1 R1. This lack of a formal transmission vegetation management program was the cause of the potential noncompliance with FAC-003-1 R2. While Milford is seeking dismissal of the alleged violation under FAC-003-1 R3 because it has experienced no reportable vegetation-related outages, the lack of a formal transmission vegetation management program contributed to any potential noncompliance with that requirement as well.

It should be noted that Milford's registration as a TO and TOP was appealed to and pending before FERC for several months, including January 2012 when the self-certification was required. Until June 13, 2012, Milford's registration status and the applicability of specific reliability requirements were in question due to Milford's appeal of the registration of its generator lead facilities as a TO/TOP. Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,214 (2012).

C.3 Provide any relevant information regarding the identification of the violation(s) associated with this Mitigation Plan:

Despite the fact that Milford's registration status and the applicability of specific reliability requirements were in question, and even though FERC had yet to rule on the applicability of those requirements to Milford, Milford has diligently worked toward compliance with the reliability standards requirements set forth in the Compliance Filing of the North American Electric Reliability Corporation, FERC Docket Nos. RC11-1-000 and RC11-2-000 (December 12, 2011). Milford submitted its January 2012 self-certifications as if the listing of requirements in that compliance filing was final, and it candidly identified areas in which it would need to implement processes and procedures in order to satisfy the relevant requirements, referencing the registration appeal in the comments section to each self-certification.

Section D: Details of Proposed Mitigation Plan

- 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 violation(s) identified above in Section C.1 of this form:

Milford adopted a formal transmission vegetation management program on March 15, 2012. This transmission vegetation management program provides for the necessary vegetation clearances, an annual plan for vegetation management, and reporting of vegetation-related outages. Milford completed 2012 required vegetation management training on April 25, 2012.

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

Proposed Completion date of Mitigation Plan: April 25, 2012

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

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date
Adopt formal transmission vegetation management program	Adopt formal transmission vegetation management program	03/15/2012	
Complete required TVMP inspection	Complete 2012 required vegetation management inspection in accordance with adopted vegetation management program	04/24/2012	
Complete vegetation management training program	Complete vegetation management training program	04/25/2012	

- D.4 Additional Relevant Information (Optional)

Section E: Interim and Future Reliability Risk

E.1 Abatement of Interim BPS Reliability Risk

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

As WECC has assessed in the June 13, 2012 Notice of Alleged Violation, these alleged violations posed minimal risk to the BES given the technical nature of Milford's facilities and operations: Milford's is an intermittent resource, its generator lead facilities are limited in use and Milford's BA has adequate provisions in place to cover generation unavailability. Because Milford's generation is not baseload and could be replaced by the BA, there was minimal risk to the BES while the Mitigation Plan was being implemented.

E.2 Prevention of Future BPS Reliability Risk

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

Milford's adoption and execution of a documented transmission vegetation management program as described above will prevent recurrence of the alleged violations.

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

Section F: Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

(a) Submits the Mitigation Plan, as laid out in Section D, to the Regional Entity for acceptance 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 Assoc. General Counsel, Dir. of Electric Regulatory Compliance of Milford Wind Corridor Phase I,
2. I am qualified to sign this Mitigation Plan on behalf of Milford Wind Corridor Phase I, LLC
3. I have read and understand Milford Wind Corridor Phase I, LLC's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure and the NERC CMEP currently in effect or the NERC CMEP-Province of Manitoba, Schedule B currently in effect, whichever is applicable.
4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
5. Milford Wind Corridor Phase I, LLC Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authorities in Canada.

Authorized Individual Signature: _____
 (Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Authorized On: August 06, 2012

Certification of Mitigation Plan Completion

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

Registered Entity Name: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

NERC Violation ID(s): WECC2012009488

Mitigated Standard Requirement(s): FAC-003-1 R1,

Scheduled Completion as per Accepted Mitigation Plan: April 25, 2012

Date Mitigation Plan completed: April 25, 2012

WECC Notified of Completion on Date: October 02, 2012

Entity Comment: Please see attached entity documents numbered 154954, 154956, 159463, 159466-159471.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	OP-700-365-005.pdf		337,778
Entity	FAC-003 MIL-INT_Line1_Inspection_2012.xlsx		83,521
Entity	FAC-003 Training Doc 1.pdf		98,935
Entity	FAC-003 Training Doc 2.pdf		45,361
Entity	FAC-003 Training Doc 3.pdf		58,517
Entity	FAC-003 Training Doc 4.pdf		73,960
Entity	FAC-003 Training Doc 5.pdf		117,593
Entity	FAC-003 MIL-INT_Line1_Vegetation_Management_04-23-12.pdf		321,935
Entity	FAC-003 MIL-INT-Line1_Inspection_2012.pdf		190,067

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Email: regulatory@firstwind.com

Phone:

Western Electricity Coordinating Council

Confidential Non-Public Information

October 02, 2012

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

CONFIDENTIAL



Chris Luras
Director of Enforcement

(801) 883-6887
cluras@wecc.biz

VIA WECC ENHANCED FILE TRANSFER SERVER

October 25, 2012

Hallie Gilman
Associate General Counsel
Milford Wind Corridor Phase I, LLC
Boston, MA 2111

NERC Registration ID: NCR10394
NERC Violation ID: WECC2012009488

Subject: Notice of Completed Mitigation Plan Acceptance
Reliability Standard FAC-003-1 Requirement 1

Hallie,

The Western Electricity Coordinating Council (WECC) received the Certification of Mitigation Plan Completion submitted by Milford Wind Corridor Phase I, LLC (MILW) on October 2, 2012 for the violation of Reliability Standard FAC-003-1 Requirement 1. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

If you have any questions or concerns, please contact SME at SME@wecc.biz.

Sincerely,

A handwritten signature in blue ink, appearing to read "CL", is placed above the name of the sender.

Chris Luras
Director of Enforcement

CL:dlc

cc: Keshav Sarin, WECC Manager, O&P and CIP

Attachment k

Record documents for the violation of FAC-003-1 R2:

k-1. MILW's Mitigation Plan designated as WECCMIT007825 submitted August 6, 2012

k-2. MILW's Certification of Mitigation Plan Completion dated October 2, 2012

k-3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012

Mitigation Plan

Registered Entity: Milford Wind Corridor Phase I, LLC

Mit Plan Code	NERC Violation ID	Requirement	Violation Validated On	Mit Plan Version
	WECC2012009489	FAC-003-1 R2	03/14/2012	1

Mitigation Plan Submitted On: August 06, 2012

Mitigation Plan Accepted On:

Mitigation Plan Proposed Completion Date: April 25, 2012

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by MILW On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Section A: Compliance Notices

Section 6.2 of the NERC 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 B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Section B: Registered Entity Information

B.1 Identify your organization:

Entity Name: Milford Wind Corridor Phase I, LLC
NERC Compliance Registry ID: NCR10394
Address: 179 Lincoln St.
Suite 500
Boston MA 02111

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

Name: Hallie Flint Gilman
Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance
Email: regulatory@firstwind.com
Phone: 207-228-6887

Section C: Identification of Reliability Standard Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2012009489	01/20/2012	FAC-003-1 R2
<p>The Transmission Owner shall create and implement an annual plan for vegetation management work to ensure the reliability of the system. The plan shall describe the methods used, such as manual clearing, mechanical clearing, herbicide treatment, or other actions. The plan should be flexible enough to adjust to changing conditions, taking into consideration anticipated growth of vegetation and all other environmental factors that may have an impact on the reliability of the transmission systems. Adjustments to the plan shall be documented as they occur. The plan should take into consideration the time required to obtain permissions or permits from landowners or regulatory authorities. Each Transmission Owner shall have systems and procedures for documenting and tracking the planned vegetation management work and ensuring that the vegetation management work was completed according to work specifications.</p>		

C.2 Brief summary including the cause of the violation(s) and mechanism in which it was identified above:

On January 20, 2012, Milford self-certified potential noncompliance with the above-listed requirements. At the time, Milford did not have a formal transmission vegetation management program as required by FAC-003-1 R1. This lack of a formal transmission vegetation management program was the cause of the potential noncompliance with FAC-003-1 R2. While Milford is seeking dismissal of the alleged violation under FAC-003-1 R3 because it has experienced no reportable vegetation-related outages, the lack of a formal transmission vegetation management program contributed to any potential noncompliance with that requirement as well.

It should be noted that Milford's registration as a TO and TOP was appealed to and pending before FERC for several months, including January 2012 when the self-certification was required. Until June 13, 2012, Milford's registration status and the applicability of specific reliability requirements were in question due to Milford's appeal of the registration of its generator lead facilities as a TO/TOP. Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,214 (2012).

C.3 Provide any relevant information regarding the identification of the violation(s) associated with this Mitigation Plan:

Despite the fact that Milford's registration status and the applicability of specific reliability requirements were in question, and even though FERC had yet to rule on the applicability of those requirements to Milford, Milford has diligently worked toward compliance with the reliability standards requirements set forth in the Compliance Filing of the North American Electric Reliability Corporation, FERC Docket Nos. RC11-1-000 and RC11-2-000 (December 12, 2011). Milford submitted its January 2012 self-certifications as if the listing of requirements in that compliance filing was final, and it candidly identified areas in which it would need to implement processes and procedures in order to satisfy the relevant requirements, referencing the registration appeal in the comments section to each self-certification.

Section D: Details of Proposed Mitigation Plan

- 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 violation(s) identified above in Section C.1 of this form:

Milford adopted a formal transmission vegetation management program on March 15, 2012. This transmission vegetation management program provides for the necessary vegetation clearances, an annual plan for vegetation management, and reporting of vegetation-related outages. Milford completed 2012 required vegetation management training on April 25, 2012.

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

Proposed Completion date of Mitigation Plan: April 25, 2012

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

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date
Adopt formal transmission vegetation management program	Adopt formal transmission vegetation management program	03/15/2012	
Complete required TVMP inspection	Complete 2012 required vegetation management inspection in accordance with adopted vegetation management program	04/24/2012	
Complete vegetation management training program	Complete vegetation management training program	04/25/2012	

- D.4 Additional Relevant Information (Optional)

Section E: Interim and Future Reliability Risk

E.1 Abatement of Interim BPS Reliability Risk

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

As WECC has assessed in the June 13, 2012 Notice of Alleged Violation, these alleged violations posed minimal risk to the BES given the technical nature of Milford's facilities and operations: Milford's is an intermittent resource, its generator lead facilities are limited in use and Milford's BA has adequate provisions in place to cover generation unavailability. Because Milford's generation is not baseload and could be replaced by the BA, there was minimal risk to the BES while the Mitigation Plan was being implemented.

E.2 Prevention of Future BPS Reliability Risk

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

Milford's adoption and execution of a documented transmission vegetation management program as described above will prevent recurrence of the alleged violations.

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

Milford's implementation of a TVMP, pursuant to the mitigation plan for FAC-003-1 R1, will support mitigation of any risk related to FAC-003-1 R2.

Section F: Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

(a) Submits the Mitigation Plan, as laid out in Section D, to the Regional Entity for acceptance 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 Assoc. General Counsel, Dir. of Electric Regulatory Compliance of Milford Wind Corridor Phase I,
2. I am qualified to sign this Mitigation Plan on behalf of Milford Wind Corridor Phase I, LLC
3. I have read and understand Milford Wind Corridor Phase I, LLC's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure and the NERC CMEP currently in effect or the NERC CMEP-Province of Manitoba, Schedule B currently in effect, whichever is applicable.
4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
5. Milford Wind Corridor Phase I, LLC Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authorities in Canada.

Authorized Individual Signature: _____
(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Authorized On: August 06, 2012

Certification of Mitigation Plan Completion

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

Registered Entity Name: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

NERC Violation ID(s): WECC2012009489

Mitigated Standard Requirement(s): FAC-003-1 R2,

Scheduled Completion as per Accepted Mitigation Plan: April 25, 2012

Date Mitigation Plan completed: April 25, 2012

WECC Notified of Completion on Date: October 02, 2012

Entity Comment: Please see entity documents 159482-159485, 159488, 159490, 159492, 159497.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	FAC-003 MIL-INT_Line1_Inspection_2012.xlsx		83,521
Entity	FAC-003 MIL-INT_Line1_Vegetation_Management_04-23-12.pdf		321,935
Entity	FAC-003 MIL-INT-Line1_Inspection_2012.pdf		190,067
Entity	FAC-003 Training Doc 1.pdf		98,935
Entity	FAC-003 Training Doc 2.pdf		45,361
Entity	FAC-003 Training Doc 3.pdf		58,517
Entity	FAC-003 Training Doc 4.pdf		73,960
Entity	FAC-003 Training Doc 5.pdf		117,593
Entity	OP-700-365-005.pdf		337,778

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Email: regulatory@firstwind.com

Phone:

Western Electricity Coordinating Council

Confidential Non-Public Information

October 02, 2012

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

CONFIDENTIAL



Chris Luras
Director of Enforcement

(801) 883-6887
cluras@wecc.biz

VIA WECC ENHANCED FILE TRANSFER SERVER

October 25, 2012

Hallie Gilman
Associate General Counsel
Milford Wind Corridor Phase I, LLC
Boston, MA 2111

NERC Registration ID: NCR10394
NERC Violation ID: WECC2012009489

Subject: Notice of Completed Mitigation Plan Acceptance
Reliability Standard FAC-003-1 Requirement 2

Hallie,

The Western Electricity Coordinating Council (WECC) received the Certification of Mitigation Plan Completion submitted by Milford Wind Corridor Phase I, LLC (MILW) on October 2, 2012 for the violation of Reliability Standard FAC-003-1 Requirement 2. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

If you have any questions or concerns, please contact SME at SME@wecc.biz.

Sincerely,

A handwritten signature in blue ink, appearing to be "CL", is written over a light blue circular stamp or watermark.

Chris Luras
Director of Enforcement

CL:dlc

cc: Keshav Sarin, WECC Manager, O&P and CIP

Attachment I

Record documents for the violation of PER-002-0 R2:

I-1. MILW's Mitigation Plan designated as WECCMIT007827 submitted August 6, 2012

I-2. MILW's Certification of Mitigation Plan Completion dated October 3, 2012

I-3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012

Mitigation Plan

Registered Entity: Milford Wind Corridor Phase I, LLC

Mit Plan Code	NERC Violation ID	Requirement	Violation Validated On	Mit Plan Version
	WECC2012009585	PER-002-0 R2	03/14/2012	1

Mitigation Plan Submitted On: August 06, 2012

Mitigation Plan Accepted On:

Mitigation Plan Proposed Completion Date: September 30, 2012

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by MILW On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Section A: Compliance Notices

Section 6.2 of the NERC 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 B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Section B: Registered Entity Information

B.1 Identify your organization:

Entity Name: Milford Wind Corridor Phase I, LLC
NERC Compliance Registry ID: NCR10394
Address: 179 Lincoln St.
Suite 500
Boston MA 02111

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

Name: Hallie Flint Gilman
Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance
Email: regulatory@firstwind.com
Phone: 207-228-6887

Section C: Identification of Reliability Standard Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2012009585	01/20/2012	PER-002-0 R2
Each Transmission Operator and Balancing Authority shall have a training program for all operating personnel that are in:		

C.2 Brief summary including the cause of the violation(s) and mechanism in which it was identified above:

On January 20, 2012, Milford self-certified potential noncompliance with the above-listed requirements. At the time, Milford did not have a formal training program for operating personnel as required by PER-002-0 R2. This lack of a formal operator training program was the cause of the potential noncompliance with the other requirements of PER-002-0.

It should be noted that Milford's registration as a TO and TOP was appealed to and pending before FERC for several months, including January 2012 when the self-certification was required. Until June 13, 2012, Milford's registration status and the applicability of specific reliability requirements were in question due to Milford's appeal of the registration of its generator lead facilities as a TO/TOP. Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,214 (2012).

C.3 Provide any relevant information regarding the identification of the violation(s) associated with this Mitigation Plan:

Despite the fact that Milford's registration status and the applicability of specific reliability requirements were in question, and even though FERC had yet to rule on the applicability of those requirements to Milford, Milford has diligently worked toward compliance with the reliability standards requirements set forth in the Compliance Filing of the North American Electric Reliability Corporation, FERC Docket Nos. RC11-1-000 and RC11-2-000 (December 12, 2011). Milford submitted its January 2012 self-certifications as if the listing of requirements in that compliance filing was final, and it candidly identified areas in which it would need to implement processes and procedures in order to satisfy the relevant requirements, referencing the registration appeal in the comments section to each self-certification.

Section D: Details of Proposed Mitigation Plan

- 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 violation(s) identified above in Section C.1 of this form:

Milford plans to adopt a formal operator training program by September 30, 2012. This program will provide for training of all relevant personnel under R2, based on the required curriculum meeting the requirements under R3, and for the required number of training-hours each year under R4.

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

Proposed Completion date of Mitigation Plan: September 30, 2012

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

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date
Adopt formal operator training program	Adopt formal operator training program	09/30/2012	

- D.4 Additional Relevant Information (Optional)

Section E: Interim and Future Reliability Risk**E.1 Abatement of Interim BPS Reliability Risk**

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

As WECC has assessed in the June 13, 2012 Notice of Alleged Violation, these alleged violations posed minimal risk to the BES given the technical nature of Milford's facilities and operations: Milford's is an intermittent resource, its generator lead facilities are limited in use and Milford's BA has adequate provisions in place to cover generation unavailability. Because Milford's generation is not baseload and could be replaced by the BA, there is minimal risk to the BES while the Mitigation Plan is being implemented.

E.2 Prevention of Future BPS Reliability Risk

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

Milford's adoption and execution of a formal operator training program as described above will prevent recurrence of the alleged violations.

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

Section F: Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

(a) Submits the Mitigation Plan, as laid out in Section D, to the Regional Entity for acceptance 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 Assoc. General Counsel, Dir. of Electric Regulatory Compliance of Milford Wind Corridor Phase I,
2. I am qualified to sign this Mitigation Plan on behalf of Milford Wind Corridor Phase I, LLC
3. I have read and understand Milford Wind Corridor Phase I, LLC's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure and the NERC CMEP currently in effect or the NERC CMEP-Province of Manitoba, Schedule B currently in effect, whichever is applicable.
4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
5. Milford Wind Corridor Phase I, LLC Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authorities in Canada.

Authorized Individual Signature: _____
(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Authorized On: August 06, 2012

Certification of Mitigation Plan Completion

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

Registered Entity Name: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

NERC Violation ID(s): WECC2012009585

Mitigated Standard Requirement(s): PER-002-0 R2,

Scheduled Completion as per Accepted Mitigation Plan: September 30, 2012

Date Mitigation Plan completed: September 19, 2012

WECC Notified of Completion on Date: October 03, 2012

Entity Comment: Please see entity document OP-700-309-001.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	OP-700-309-001.pdf		248,086

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Email: regulatory@firstwind.com

Phone:

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

CONFIDENTIAL



Chris Luras
Director of Enforcement

(801) 883-6887
cluras@wecc.biz

VIA WECC ENHANCED FILE TRANSFER SERVER

October 25, 2012

Hallie Gilman
Associate General Counsel
Milford Wind Corridor Phase I, LLC
Boston, MA 2111

NERC Registration ID: NCR10394
NERC Violation ID: WECC2012009585

Subject: Notice of Completed Mitigation Plan Acceptance
Reliability Standard PER-002-0 Requirement 2

Hallie,

The Western Electricity Coordinating Council (WECC) received the Certification of Mitigation Plan Completion submitted by Milford Wind Corridor Phase I, LLC (MILW) on October 3, 2012 for the violation of Reliability Standard PER-002-0 Requirement 2. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

If you have any questions or concerns, please contact SME at SME@wecc.biz.

Sincerely,

A handwritten signature in blue ink, appearing to be "CL", is written over a light blue circular stamp or watermark.

Chris Luras
Director of Enforcement

CL:dlc

cc: Keshav Sarin, WECC Manager, O&P and CIP

Attachment m

Record documents for the violation of PER-002-0 R3:

m-1. MILW's Mitigation Plan designated as WECCMIT007828 submitted August 6, 2012

m-2. MILW's Certification of Mitigation Plan Completion dated October 3, 2012

m-3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012

Mitigation Plan

Registered Entity: Milford Wind Corridor Phase I, LLC

Mit Plan Code	NERC Violation ID	Requirement	Violation Validated On	Mit Plan Version
	WECC2012009586	PER-002-0 R3	03/14/2012	1

Mitigation Plan Submitted On: August 06, 2012

Mitigation Plan Accepted On:

Mitigation Plan Proposed Completion Date: September 30, 2012

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by MILW On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Section A: Compliance Notices

Section 6.2 of the NERC 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 B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Section B: Registered Entity Information

B.1 Identify your organization:

Entity Name: Milford Wind Corridor Phase I, LLC
NERC Compliance Registry ID: NCR10394
Address: 179 Lincoln St.
Suite 500
Boston MA 02111

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

Name: Hallie Flint Gilman
Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance
Email: regulatory@firstwind.com
Phone: 207-228-6887

Section C: Identification of Reliability Standard Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2012009586	01/20/2012	PER-002-0 R3
For personnel identified in Requirement R2, the Transmission Operator and Balancing Authority shall provide a training program meeting the following criteria		

C.2 Brief summary including the cause of the violation(s) and mechanism in which it was identified above:

On January 20, 2012, Milford self-certified potential noncompliance with the above-listed requirements. At the time, Milford did not have a formal training program for operating personnel as required by PER-002-0 R2. This lack of a formal operator training program was the cause of the potential noncompliance with the other requirements of PER-002-0.

It should be noted that Milford's registration as a TO and TOP was appealed to and pending before FERC for several months, including January 2012 when the self-certification was required. Until June 13, 2012, Milford's registration status and the applicability of specific reliability requirements were in question due to Milford's appeal of the registration of its generator lead facilities as a TO/TOP. Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,214 (2012).

C.3 Provide any relevant information regarding the identification of the violation(s) associated with this Mitigation Plan:

Despite the fact that Milford's registration status and the applicability of specific reliability requirements were in question, and even though FERC had yet to rule on the applicability of those requirements to Milford, Milford has diligently worked toward compliance with the reliability standards requirements set forth in the Compliance Filing of the North American Electric Reliability Corporation, FERC Docket Nos. RC11-1-000 and RC11-2-000 (December 12, 2011). Milford submitted its January 2012 self-certifications as if the listing of requirements in that compliance filing was final, and it candidly identified areas in which it would need to implement processes and procedures in order to satisfy the relevant requirements, referencing the registration appeal in the comments section to each self-certification.

Section D: Details of Proposed Mitigation Plan

- 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 violation(s) identified above in Section C.1 of this form:

Milford plans to adopt a formal operator training program by September 30, 2012. This program will provide for training of all relevant personnel under R2, based on the required curriculum meeting the requirements under R3, and for the required number of training-hours each year under R4.

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

Proposed Completion date of Mitigation Plan: September 30, 2012

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

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date
Adopt formal operator training program	Adopt formal operator training program	09/30/2012	

- D.4 Additional Relevant Information (Optional)

Section E: Interim and Future Reliability Risk

E.1 Abatement of Interim BPS Reliability Risk

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

As WECC has assessed in the June 13, 2012 Notice of Alleged Violation, these alleged violations posed minimal risk to the BES given the technical nature of Milford's facilities and operations: Milford's is an intermittent resource, its generator lead facilities are limited in use and Milford's BA has adequate provisions in place to cover generation unavailability. Because Milford's generation is not baseload and could be replaced by the BA, there is minimal risk to the BES while the Mitigation Plan is being implemented.

E.2 Prevention of Future BPS Reliability Risk

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

Milford's adoption and execution of a formal operator training program as described above will prevent recurrence of the alleged violations.

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

Milford's adoption of a formal operator training program, pursuant to the mitigation plan for PER-002-0 R2, will support mitigation of any risks related to PER-002-0 R3.

Section F: Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

(a) Submits the Mitigation Plan, as laid out in Section D, to the Regional Entity for acceptance 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 Assoc. General Counsel, Dir. of Electric Regulatory Compliance of Milford Wind Corridor Phase I,
2. I am qualified to sign this Mitigation Plan on behalf of Milford Wind Corridor Phase I, LLC
3. I have read and understand Milford Wind Corridor Phase I, LLC's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure and the NERC CMEP currently in effect or the NERC CMEP-Province of Manitoba, Schedule B currently in effect, whichever is applicable.
4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
5. Milford Wind Corridor Phase I, LLC Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authorities in Canada.

Authorized Individual Signature: _____
(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Authorized On: August 06, 2012

Certification of Mitigation Plan Completion

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

Registered Entity Name: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

NERC Violation ID(s): WECC2012009586

Mitigated Standard Requirement(s): PER-002-0 R3,

Scheduled Completion as per Accepted Mitigation Plan: September 30, 2012

Date Mitigation Plan completed: September 19, 2012

WECC Notified of Completion on Date: October 03, 2012

Entity Comment: Please see entity document OP-700-309-001.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	OP-700-309-001.pdf		248,086

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Email: regulatory@firstwind.com

Phone:

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

CONFIDENTIAL



Chris Luras
Director of Enforcement

(801) 883-6887
cluras@wecc.biz

VIA WECC ENHANCED FILE TRANSFER SERVER

October 25, 2012

Hallie Gilman
Associate General Counsel
Milford Wind Corridor Phase I, LLC
Boston, MA 2111

NERC Registration ID: NCR10394
NERC Violation ID: WECC2012009586

Subject: Notice of Completed Mitigation Plan Acceptance
Reliability Standard PER-002-0 Requirement 3

Hallie,

The Western Electricity Coordinating Council (WECC) received the Certification of Mitigation Plan Completion submitted by Milford Wind Corridor Phase I, LLC (MILW) on October 3, 2012 for the violation of Reliability Standard PER-002-0 Requirement 3. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

If you have any questions or concerns, please contact SME at SME@wecc.biz.

Sincerely,



Chris Luras
Director of Enforcement

CL:dlc

cc: Keshav Sarin, WECC Manager, O&P and CIP

Attachment n

Record documents for the violation of PER-002-0 R4:

n-1. MILW's Mitigation Plan designated as WECCMIT007829 submitted August 6, 2012

n-2. MILW's Certification of Mitigation Plan Completion dated October 3, 2012

n-3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012

Mitigation Plan

Registered Entity: Milford Wind Corridor Phase I, LLC

Mit Plan Code	NERC Violation ID	Requirement	Violation Validated On	Mit Plan Version
	WECC2012009587	PER-002-0 R4	03/14/2012	1

Mitigation Plan Submitted On: August 06, 2012

Mitigation Plan Accepted On:

Mitigation Plan Proposed Completion Date: September 30, 2012

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by MILW On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Section A: Compliance Notices

Section 6.2 of the NERC 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 B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Section B: Registered Entity Information

B.1 Identify your organization:

Entity Name: Milford Wind Corridor Phase I, LLC
NERC Compliance Registry ID: NCR10394
Address: 179 Lincoln St.
Suite 500
Boston MA 02111

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

Name: Hallie Flint Gilman
Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance
Email: regulatory@firstwind.com
Phone: 207-228-6887

Section C: Identification of Reliability Standard Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2012009587	03/31/2011	PER-002-0 R4
For personnel identified in Requirement R2, each Transmission Operator and Balancing Authority shall provide its operating personnel at least five days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.		

C.2 Brief summary including the cause of the violation(s) and mechanism in which it was identified above:

On January 20, 2012, Milford self-certified potential noncompliance with the above-listed requirements. At the time, Milford did not have a formal training program for operating personnel as required by PER-002-0 R2. This lack of a formal operator training program was the cause of the potential noncompliance with the other requirements of PER-002-0.

It should be noted that Milford's registration as a TO and TOP was appealed to and pending before FERC for several months, including January 2012 when the self-certification was required. Until June 13, 2012, Milford's registration status and the applicability of specific reliability requirements were in question due to Milford's appeal of the registration of its generator lead facilities as a TO/TOP. Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,214 (2012).

C.3 Provide any relevant information regarding the identification of the violation(s) associated with this Mitigation Plan:

Despite the fact that Milford's registration status and the applicability of specific reliability requirements were in question, and even though FERC had yet to rule on the applicability of those requirements to Milford, Milford has diligently worked toward compliance with the reliability standards requirements set forth in the Compliance Filing of the North American Electric Reliability Corporation, FERC Docket Nos. RC11-1-000 and RC11-2-000 (December 12, 2011). Milford submitted its January 2012 self-certifications as if the listing of requirements in that compliance filing was final, and it candidly identified areas in which it would need to implement processes and procedures in order to satisfy the relevant requirements, referencing the registration appeal in the comments section to each self-certification.

Section D: Details of Proposed Mitigation Plan

- 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 violation(s) identified above in Section C.1 of this form:

Milford plans to adopt a formal operator training program by September 30, 2012. This program will provide for training of all relevant personnel under R2, based on the required curriculum meeting the requirements under R3, and for the required number of training-hours each year under R4.

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

Proposed Completion date of Mitigation Plan: September 30, 2012

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

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date
Adoption of formal operator training program	Adoption of formal operator training program	09/30/2012	

- D.4 Additional Relevant Information (Optional)

Section E: Interim and Future Reliability Risk

E.1 Abatement of Interim BPS Reliability Risk

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

As WECC has assessed in the June 13, 2012 Notice of Alleged Violation, these alleged violations posed minimal risk to the BES given the technical nature of Milford's facilities and operations: Milford's is an intermittent resource, its generator lead facilities are limited in use and Milford's BA has adequate provisions in place to cover generation unavailability. Because Milford's generation is not baseload and could be replaced by the BA, there is minimal risk to the BES while the Mitigation Plan is being implemented.

E.2 Prevention of Future BPS Reliability Risk

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

Milford's adoption and execution of a formal operator training program as described above will prevent recurrence of the alleged violations.

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

Milford's adoption of a formal operator training program, pursuant to the mitigation plan for PER-002-0 R2, will support mitigation of any risks related to PER-002-0 R4.

Section F: Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

(a) Submits the Mitigation Plan, as laid out in Section D, to the Regional Entity for acceptance 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 Assoc. General Counsel, Dir. of Electric Regulatory Compliance of Milford Wind Corridor Phase I,
2. I am qualified to sign this Mitigation Plan on behalf of Milford Wind Corridor Phase I, LLC
3. I have read and understand Milford Wind Corridor Phase I, LLC's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure and the NERC CMEP currently in effect or the NERC CMEP-Province of Manitoba, Schedule B currently in effect, whichever is applicable.
4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
5. Milford Wind Corridor Phase I, LLC Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authorities in Canada.

Authorized Individual Signature: _____
(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Authorized On: August 06, 2012

Certification of Mitigation Plan Completion

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

Registered Entity Name: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

NERC Violation ID(s): WECC2012009587

Mitigated Standard Requirement(s): PER-002-0 R4,

Scheduled Completion as per Accepted Mitigation Plan: September 30, 2012

Date Mitigation Plan completed: September 19, 2012

WECC Notified of Completion on Date: October 03, 2012

Entity Comment: Please see entity document OP-700-309-001.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	OP-700-309-001.pdf		248,086

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Email: regulatory@firstwind.com

Phone:

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

CONFIDENTIAL



Chris Luras
Director of Enforcement

(801) 883-6887
cluras@wecc.biz

VIA WECC ENHANCED FILE TRANSFER SERVER

October 25, 2012

Hallie Gilman
Associate General Counsel
Milford Wind Corridor Phase I, LLC
Boston, MA 2111

NERC Registration ID: NCR10394
NERC Violation ID: WECC2012009587

Subject: Notice of Completed Mitigation Plan Acceptance
Reliability Standard PER-002-0 Requirement 4

Hallie,

The Western Electricity Coordinating Council (WECC) received the Certification of Mitigation Plan Completion submitted by Milford Wind Corridor Phase I, LLC (MILW) on October 3, 2012 for the violation of Reliability Standard PER-002-0 Requirement 4. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

If you have any questions or concerns, please contact SME at SME@wecc.biz.

Sincerely,

A handwritten signature in blue ink, appearing to be "CL", is written over a light blue circular stamp or watermark.

Chris Luras
Director of Enforcement

CL:dlc

cc: Keshav Sarin, WECC Manager, O&P and CIP

Attachment o

Record documents for the violation of PER-003-0 R1:

- o-1. MILW's Mitigation Plan designated as WECCMIT007830 submitted August 6, 2012**
 - o-2. MILW's Certification of Mitigation Plan Completion dated October 3, 2012**
 - o-3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012**
-

Mitigation Plan

Registered Entity: Milford Wind Corridor Phase I, LLC

Mit Plan Code	NERC Violation ID	Requirement	Violation Validated On	Mit Plan Version
	WECC2012009494	PER-003-0 R1	03/14/2012	1

Mitigation Plan Submitted On: August 06, 2012

Mitigation Plan Accepted On:

Mitigation Plan Proposed Completion Date: September 30, 2012

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by MILW On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Section A: Compliance Notices

Section 6.2 of the NERC 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 B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Section B: Registered Entity Information

B.1 Identify your organization:

Entity Name: Milford Wind Corridor Phase I, LLC
NERC Compliance Registry ID: NCR10394
Address: 179 Lincoln St.
Suite 500
Boston MA 02111

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

Name: Hallie Flint Gilman
Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance
Email: regulatory@firstwind.com
Phone: 207-228-6887

Section C: Identification of Reliability Standard Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2012009494	01/20/2012	PER-003-0 R1
Each Transmission Operator, Balancing Authority, and Reliability Coordinator shall staff all operating positions that meet both of the following criteria with personnel that are NERC-certified for the applicable functions:		

C.2 Brief summary including the cause of the violation(s) and mechanism in which it was identified above:

On January 20, 2012, Milford self-certified potential noncompliance with the above-listed requirements. At the time Milford did not have NERC-certified transmission operator personnel.

It should be noted that Milford's registration as a TO and TOP was appealed to and pending before FERC for several months, including January 2012 when the self-certification was required. Until June 13, 2012, Milford's registration status and the applicability of specific reliability requirements were in question due to Milford's appeal of the registration of its generator lead facilities as a TO/TOP. Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,214 (2012).

C.3 Provide any relevant information regarding the identification of the violation(s) associated with this Mitigation Plan:

Despite the fact that Milford's registration status and the applicability of specific reliability requirements were in question, and even though FERC had yet to rule on the applicability of those requirements to Milford, Milford has diligently worked toward compliance with the reliability standards requirements set forth in the Compliance Filing of the North American Electric Reliability Corporation, FERC Docket Nos. RC11-1-000 and RC11-2-000 (December 12, 2011). Milford submitted its January 2012 self-certifications as if the listing of requirements in that compliance filing was final, and it candidly identified areas in which it would need to implement processes and procedures in order to satisfy the relevant requirements, referencing the registration appeal in the comments section to each self-certification.

Section D: Details of Proposed Mitigation Plan

- 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 violation(s) identified above in Section C.1 of this form:

Milford has provided a PER-003-0 training program to all relevant personnel as set forth in PER-003-0 R1.1 and R2.1. All relevant personnel will apply to NERC for certification by August 30, 2012. By September 30, 2012, Milford will have at least one NERC-certified operator managing its transmission operations.

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

Proposed Completion date of Mitigation Plan: September 30, 2012

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

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date
Milford Personnel apply to NERC for certification	Milford Personnel apply to NERC for certification	08/30/2012	
Milford will have at least one NERC certified operator managing its operations	Milford will have at least one NERC certified operator managing its operations	09/30/2012	

- D.4 Additional Relevant Information (Optional)

Section E: Interim and Future Reliability Risk

E.1 Abatement of Interim BPS Reliability Risk

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

As WECC has assessed in the June 13, 2012 Notice of Alleged Violation, these alleged violations posed minimal risk to the BES given the technical nature of Milford's facilities and operations: Milford's is an intermittent resource, its generator lead facilities are limited in use and Milford's BA has adequate provisions in place to cover generation unavailability. Because Milford's generation is not baseload and could be replaced by the BA, there is minimal risk to the BES while the Mitigation Plan is being implemented.

E.2 Prevention of Future BPS Reliability Risk

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

To prevent recurrence of the alleged violations, Milford will have at least one NERC-certified operator managing its transmission operations, and the company will ensure that it will continue to have at least one NERC-certified operator on staff either through hiring or training relevant personnel.

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

Section F: Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

(a) Submits the Mitigation Plan, as laid out in Section D, to the Regional Entity for acceptance 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 Assoc. General Counsel, Dir. of Electric Regulatory Compliance of Milford Wind Corridor Phase I,
2. I am qualified to sign this Mitigation Plan on behalf of Milford Wind Corridor Phase I, LLC
3. I have read and understand Milford Wind Corridor Phase I, LLC's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure and the NERC CMEP currently in effect or the NERC CMEP-Province of Manitoba, Schedule B currently in effect, whichever is applicable.
4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
5. Milford Wind Corridor Phase I, LLC Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authorities in Canada.

Authorized Individual Signature: _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Authorized On: August 06, 2012

Certification of Mitigation Plan Completion

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

Registered Entity Name: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

NERC Violation ID(s): WECC2012009494

Mitigated Standard Requirement(s): PER-003-0 R1,

Scheduled Completion as per Accepted Mitigation Plan: September 30, 2012

Date Mitigation Plan completed: September 19, 2012

WECC Notified of Completion on Date: October 03, 2012

Entity Comment: Please see entity document OP-700-309-001. In addition, six Milford operators are now NERC certified more than one for each shift). The notices indicating those six certifications are attached as Doc ID 155220, 15222, 15223, and 15225-7.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	OP-700-309-001.pdf		248,086
Entity	NERC BIT EXAM SHEET Kevin McBride.pdf		33,888
Entity	NERC BIT EXAM SHEET Kevin Swain.pdf		36,481
Entity	NERC BIT EXAM SHEET Matt Forrest.pdf		34,024
Entity	NERC BIT EXAM SHEET Pavan Dhavaleshwar.pdf		44,515
Entity	NERC TO Exam Elias Hayak.pdf		29,460
Entity	NERC TO Exam Hellen Doucette.pdf		61,392

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Email: regulatory@firstwind.com

Phone:

Western Electricity Coordinating Council

Confidential Non-Public Information

October 03, 2012

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

CONFIDENTIAL



Chris Luras
Director of Enforcement

(801) 883-6887
cluras@wecc.biz

VIA WECC ENHANCED FILE TRANSFER SERVER

October 25, 2012

Hallie Gilman
Associate General Counsel
Milford Wind Corridor Phase I, LLC
Boston, MA 2111

NERC Registration ID: NCR10394
NERC Violation ID: WECC2012009494

Subject: Notice of Completed Mitigation Plan Acceptance
Reliability Standard PER-003-0 Requirement 1

Hallie,

The Western Electricity Coordinating Council (WECC) received the Certification of Mitigation Plan Completion submitted by Milford Wind Corridor Phase I, LLC (MILW) on October 3, 2012 for the violation of Reliability Standard PER-003-0 Requirement 1. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

If you have any questions or concerns, please contact SME at SME@wecc.biz.

Sincerely,

A handwritten signature in blue ink, appearing to be "CL", is written over a light blue circular stamp or watermark.

Chris Luras
Director of Enforcement

CL:dlc
cc: Keshav Sarin, WECC Manager, O&P and CIP

Attachment p

Record documents for the violation of TOP-001-1 R1:

p-1. MILW's Mitigation Plan designated as WECCMIT007831 submitted August 6, 2012

p-2. MILW's Certification of Mitigation Plan Completion dated October 3, 2012

p-3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012

Mitigation Plan

Registered Entity: Milford Wind Corridor Phase I, LLC

Mit Plan Code	NERC Violation ID	Requirement	Violation Validated On	Mit Plan Version
	WECC2012009496	TOP-001-1 R1	03/13/2012	1

Mitigation Plan Submitted On: August 06, 2012

Mitigation Plan Accepted On:

Mitigation Plan Proposed Completion Date: September 30, 2012

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by MILW On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Section A: Compliance Notices

Section 6.2 of the NERC 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 B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Section B: Registered Entity Information

B.1 Identify your organization:

Entity Name: Milford Wind Corridor Phase I, LLC
NERC Compliance Registry ID: NCR10394
Address: 179 Lincoln St.
Suite 500
Boston MA 02111

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

Name: Hallie Flint Gilman
Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance
Email: regulatory@firstwind.com
Phone: 207-228-6887

Section C: Identification of Reliability Standard Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2012009496	11/20/2011	TOP-001-1 R1
Each Transmission Operator shall have the responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its area and shall exercise specific authority to alleviate operating emergencies.		

C.2 Brief summary including the cause of the violation(s) and mechanism in which it was identified above:

On January 20, 2012, Milford self-certified potential noncompliance with the above-listed requirements. At the time, Milford reported that not all transmission operators had clear decision-making authority to take whatever actions were needed to ensure the reliability of Milford's area.

It should be noted that Milford's registration as a TO and TOP was appealed to and pending before FERC for several months, including January 2012 when the self-certification was required. Until June 13, 2012, Milford's registration status and the applicability of specific reliability requirements were in question due to Milford's appeal of the registration of its generator lead facilities as a TO/TOP. Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,214 (2012).

C.3 Provide any relevant information regarding the identification of the violation(s) associated with this Mitigation Plan:

Despite the fact that Milford's registration status and the applicability of specific reliability requirements were in question, and even though FERC had yet to rule on the applicability of those requirements to Milford, Milford has diligently worked toward compliance with the reliability standards requirements set forth in the Compliance Filing of the North American Electric Reliability Corporation, FERC Docket Nos. RC11-1-000 and RC11-2-000 (December 12, 2011). Milford submitted its January 2012 self-certifications as if the listing of requirements in that compliance filing was final, and it candidly identified areas in which it would need to implement processes and procedures in order to satisfy the relevant requirements, referencing the registration appeal in the comments section to each self-certification.

Section D: Details of Proposed Mitigation Plan

- 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 violation(s) identified above in Section C.1 of this form:

Milford plans to adopt a letter of authority on the certification of relevant personnel as NERC certified operators, by September 30, 2012. This letter of authority will be signed by the president of the company and will provide clear authority for transmission operating personnel to take all actions necessary to maintain reliability of Milford's transmission system. The letter of authority was posted will be posted in Milford's control room.

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

Proposed Completion date of Mitigation Plan: September 30, 2012

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

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date
Adopt letter of authority	Adopt letter of authority	09/30/2012	
Post letter of authority	Post letter of authority in Milford control room	09/30/2012	

- D.4 Additional Relevant Information (Optional)

Section E: Interim and Future Reliability Risk

E.1 Abatement of Interim BPS Reliability Risk

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

As WECC has assessed in the June 13, 2012 Notice of Alleged Violation, these alleged violations posed minimal risk to the BES given the technical nature of Milford's facilities and operations: Milford's is an intermittent resource, its generator lead facilities are limited in use and Milford's BA has adequate provisions in place to cover generation unavailability. Because Milford's generation is not baseload and could be replaced by the BA, there is minimal risk to the BES while the Mitigation Plan is being implemented.

E.2 Prevention of Future BPS Reliability Risk

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

Milford's adoption of and adherence to a letter of authority as described above will prevent recurrence of the alleged violations.

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

Section F: Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

(a) Submits the Mitigation Plan, as laid out in Section D, to the Regional Entity for acceptance 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 Assoc. General Counsel, Dir. of Electric Regulatory Compliance of Milford Wind Corridor Phase I,
2. I am qualified to sign this Mitigation Plan on behalf of Milford Wind Corridor Phase I, LLC
3. I have read and understand Milford Wind Corridor Phase I, LLC's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure and the NERC CMEP currently in effect or the NERC CMEP-Province of Manitoba, Schedule B currently in effect, whichever is applicable.
4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
5. Milford Wind Corridor Phase I, LLC Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authorities in Canada.

Authorized Individual Signature: _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Authorized On: August 06, 2012

Certification of Mitigation Plan Completion

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

Registered Entity Name: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

NERC Violation ID(s): WECC2012009496

Mitigated Standard Requirement(s): TOP-001-1 R1,

Scheduled Completion as per Accepted Mitigation Plan: September 30, 2012

Date Mitigation Plan completed: September 14, 2012

WECC Notified of Completion on Date: October 03, 2012

Entity Comment: Please see entity documents numbered 155497 and 155498.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	Re Letter of authority per TOP-001.msg		78,336
Entity	NERC Certified Operators Letter of Authority.pdf		31,730

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Email: regulatory@firstwind.com

Phone:

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

CONFIDENTIAL



Chris Luras
Director of Enforcement

(801) 883-6887
cluras@wecc.biz

VIA WECC ENHANCED FILE TRANSFER SERVER

October 25, 2012

Hallie Gilman
Associate General Counsel
Milford Wind Corridor Phase I, LLC
Boston, MA 2111

NERC Registration ID: NCR10394
NERC Violation ID: WECC2012009496

Subject: Notice of Completed Mitigation Plan Acceptance
Reliability Standard TOP-001-1 Requirement 1

Hallie,

The Western Electricity Coordinating Council (WECC) received the Certification of Mitigation Plan Completion submitted by Milford Wind Corridor Phase I, LLC (MILW) on October 3, 2012 for the violation of Reliability Standard TOP-001-1 Requirement 1. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

If you have any questions or concerns, please contact SME at SME@wecc.biz.

Sincerely,



Chris Luras
Director of Enforcement

CL:dlc
cc: Keshav Sarin, WECC Manager, O&P and CIP

Attachment q

Record documents for the violation of TOP-004-2 R6:

q-1. MILW's Mitigation Plan designated as WECCMIT007832 submitted August 6, 2012

q-2. MILW's Certification of Mitigation Plan Completion dated October 3, 2012

q-3. WECC's Verification of Mitigation Plan Completion dated October 25, 2012

Mitigation Plan

Registered Entity: Milford Wind Corridor Phase I, LLC

Mit Plan Code	NERC Violation ID	Requirement	Violation Validated On	Mit Plan Version
	WECC2012009497	TOP-004-2 R6	03/13/2012	1

Mitigation Plan Submitted On: August 06, 2012

Mitigation Plan Accepted On:

Mitigation Plan Proposed Completion Date: September 30, 2012

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by MILW On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Section A: Compliance Notices

Section 6.2 of the NERC 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 B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Section B: Registered Entity Information

B.1 Identify your organization:

Entity Name: Milford Wind Corridor Phase I, LLC
NERC Compliance Registry ID: NCR10394
Address: 179 Lincoln St.
Suite 500
Boston MA 02111

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

Name: Hallie Flint Gilman
Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance
Email: regulatory@firstwind.com
Phone: 207-228-6887

Section C: Identification of Reliability Standard Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2012009497	01/20/2012	TOP-004-2 R6
Transmission Operators, individually and jointly with other Transmission Operators, shall develop, maintain, and implement formal policies and procedures to provide for transmission reliability. These policies and procedures shall address the execution and coordination of activities that impact inter- and intra-Regional reliability, including:		

C.2 Brief summary including the cause of the violation(s) and mechanism in which it was identified above:

On January 20, 2012, Milford self-certified potential noncompliance with the above-listed requirements. At the time, Milford reported that it did not have in place formal formal policies and procedures to provide for transmission reliability as required by the above referenced requirement.

It should be noted that Milford's registration as a TO and TOP was appealed to and pending before FERC for several months, including January 2012 when the self-certification was required. Until June 13, 2012, Milford's registration status and the applicability of specific reliability requirements were in question due to Milford's appeal of the registration of its generator lead facilities as a TO/TOP. Cedar Creek Wind Energy, LLC and Milford Wind Corridor Phase I, LLC, 139 FERC ¶ 61,214 (2012).

C.3 Provide any relevant information regarding the identification of the violation(s) associated with this Mitigation Plan:

Despite the fact that Milford's registration status and the applicability of specific reliability requirements were in question, and even though FERC had yet to rule on the applicability of those requirements to Milford, Milford has diligently worked toward compliance with the reliability standards requirements set forth in the Compliance Filing of the North American Electric Reliability Corporation, FERC Docket Nos. RC11-1-000 and RC11-2-000 (December 12, 2011). Milford submitted its January 2012 self-certifications as if the listing of requirements in that compliance filing was final, and it candidly identified areas in which it would need to implement processes and procedures in order to satisfy the relevant requirements, referencing the registration appeal in the comments section to each self-certification.

Section D: Details of Proposed Mitigation Plan

- 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 violation(s) identified above in Section C.1 of this form:

Milford plans to adopt a transmission operators' manual by September 30, 2012. This transmission operators' manual will provide policies and procedures that address the execution and coordination of activities that impact inter- and intra-Regional reliability as specified under TOP-004-2 R6.

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

Proposed Completion date of Mitigation Plan: September 30, 2012

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

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date
Adopt transmission operators' manual	Adopt transmission operators' manual	09/30/2012	
Share copy of transmission operators' manual with operating personnel	Share copy of transmission operators' manual with operating personnel	09/30/2012	

- D.4 Additional Relevant Information (Optional)

Section E: Interim and Future Reliability Risk

E.1 Abatement of Interim BPS Reliability Risk

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

As WECC has assessed in the June 13, 2012 Notice of Alleged Violation, these alleged violations posed minimal risk to the BES given the technical nature of Milford's facilities and operations: Milford's is an intermittent resource, its generator lead facilities are limited in use and Milford's BA has adequate provisions in place to cover generation unavailability. Because Milford's generation is not baseload and could be replaced by the BA, there is minimal risk to the BES while the Mitigation Plan is being implemented.

E.2 Prevention of Future BPS Reliability Risk

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

Milford's adoption and adherence to the transmission operators' manual as described above will prevent recurrence of the alleged violations.

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

Section F: Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

(a) Submits the Mitigation Plan, as laid out in Section D, to the Regional Entity for acceptance 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 Assoc. General Counsel, Dir. of Electric Regulatory Compliance of Milford Wind Corridor Phase I,
2. I am qualified to sign this Mitigation Plan on behalf of Milford Wind Corridor Phase I, LLC
3. I have read and understand Milford Wind Corridor Phase I, LLC's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure and the NERC CMEP currently in effect or the NERC CMEP-Province of Manitoba, Schedule B currently in effect, whichever is applicable.
4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
5. Milford Wind Corridor Phase I, LLC Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authorities in Canada.

Authorized Individual Signature: _____
(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Authorized On: August 06, 2012

Certification of Mitigation Plan Completion

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

Registered Entity Name: Milford Wind Corridor Phase I, LLC

NERC Registry ID: NCR10394

NERC Violation ID(s): WECC2012009497

Mitigated Standard Requirement(s): TOP-004-2 R6,

Scheduled Completion as per Accepted Mitigation Plan: September 30, 2012

Date Mitigation Plan completed: September 25, 2012

WECC Notified of Completion on Date: October 03, 2012

Entity Comment: Please see entity document OP-700-302-003.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	exception.pdf	Completed exception request related to vendor attestations and PRA completion	1,372,253
Entity	BackgroundCheckLetter.pdf	OSI letter attesting to 7 year background investigation	25,168
Entity	OP-700-302-003.pdf		176,888

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Hallie Flint Gilman

Title: Assoc. General Counsel, Dir. of Electric Regulatory Compliance

Email: regulatory@firstwind.com

Phone:

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

CONFIDENTIAL



Chris Luras
Director of Enforcement

(801) 883-6887
cluras@wecc.biz

VIA WECC ENHANCED FILE TRANSFER SERVER

October 25, 2012

Hallie Gilman
Associate General Counsel
Milford Wind Corridor Phase I, LLC
Boston, MA 2111

NERC Registration ID: NCR10394
NERC Violation ID: WECC2012009497

Subject: Notice of Completed Mitigation Plan Acceptance
Reliability Standard TOP-004-2 Requirement 6

Hallie,

The Western Electricity Coordinating Council (WECC) received the Certification of Mitigation Plan Completion submitted by Milford Wind Corridor Phase I, LLC (MILW) on October 3, 2012 for the violation of Reliability Standard TOP-004-2 Requirement 6. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

If you have any questions or concerns, please contact SME at SME@wecc.biz.

Sincerely,

A handwritten signature in blue ink, appearing to be "CL", is written over a light blue horizontal line.

Chris Luras
Director of Enforcement

CL:dlc
cc: Keshav Sarin, WECC Manager, O&P and CIP

Attachment r
Notice of Filing

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Milford Wind Corridor Phase I, LLC

Docket No. NP13-____-000

NOTICE OF FILING
June 27, 2013

Take notice that on June 27, 2013, the North American Electric Reliability Corporation (NERC) filed a Notice of Penalty regarding Milford Wind Corridor Phase I, LLC 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