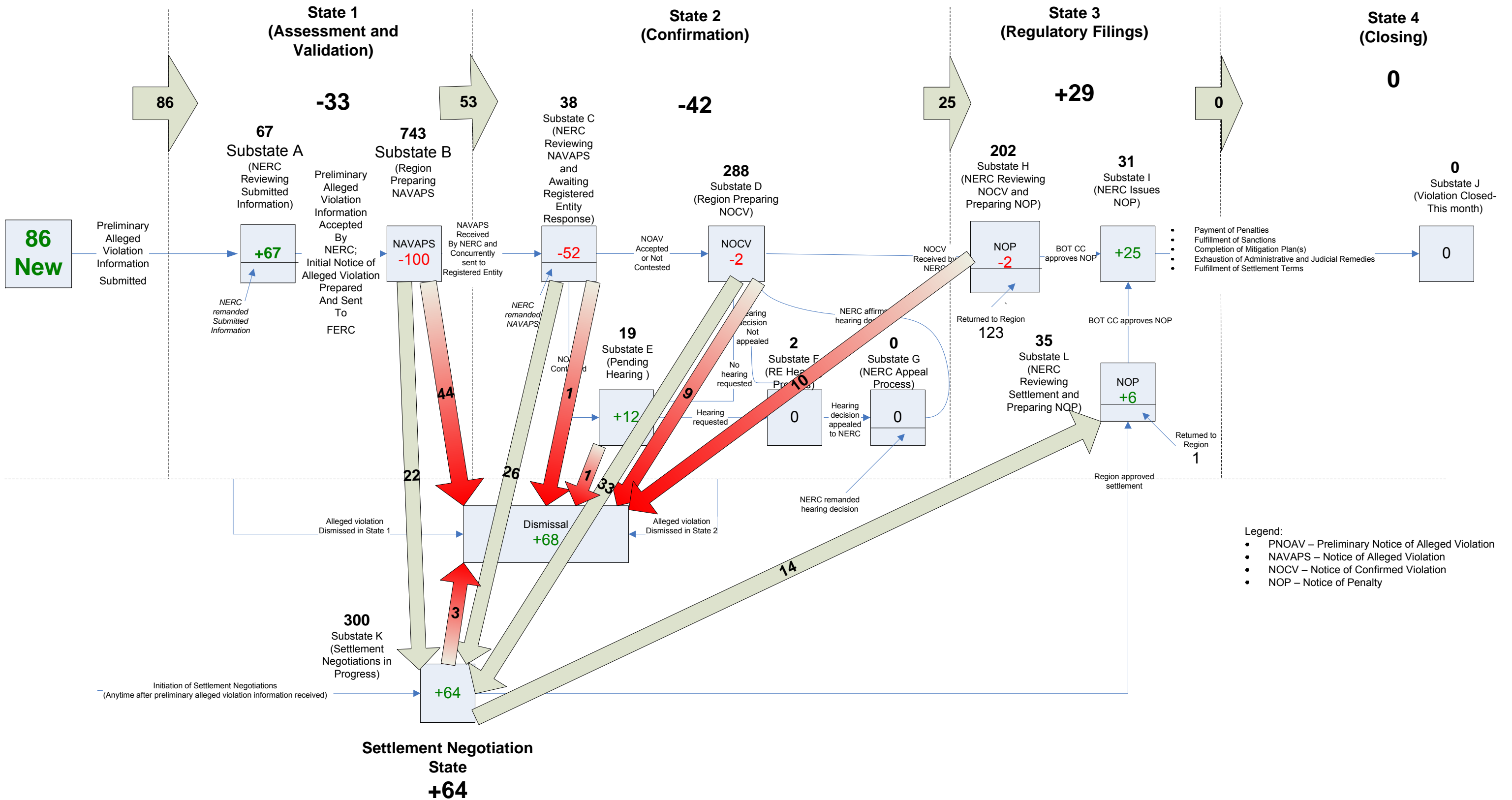


# Violation Process States and Underlying Process Sub states

Snapshot comparison between January 1, 2009 and January 31, 2009



**Violation Process State Summary Table — Active FERC Enforceable Alleged Violations**

Below is a breakdown, as of January 31, 2009, of the Compliance Monitoring and Enforcement Program (CMEP) Violation “state” summary for the 1725 active violations.

Region	State 1 (Assessment and Validation)		State 2 (Confirmation)					Settlement	State 3 (Regulatory Filings)			State 4 (Closing)	Total
	Substate A (NERC Reviewing)	Substate B (Region Preparing NAVAP)	Substate C (NERC Reviewing NAVAP and awaiting RE Response)	Substate D (Region Preparing NOCV)	Substate E (Pending Hearing)	Substate F (RE Hearing Process)	Substate G (NERC Appeal Process)	Substate K (Settlement Negotiations)	Substate H (NERC Reviewing NOCV)	Substate L (NERC Reviewing Settlement Agreement)	Substate I (NERC Issues NOP)	Substate J (Violation Closes)	
FRCC	6	53	18	12	0	0	0	13	27	0	0	0	129
MRO	0	7	0	3	0	0	0	5	33	0	0	0	48
NPCC	1	0	0	0	0	0	0	20	5	12	0	0	38
RFC	3	40	0	2	0	2	0	46	11	3	0	0	107
SERC	0	65	0	1	0	0	0	48	7	15	19	0	155
SPP	0	10	1	41	1	0	0	1	3	1	0	0	58
TRE	0	20	0	0	0	0	0	13	6	4	12	0	55
WECC	57	548	19	229	18	0	0	154	110	0	0	0	1135
<b>TOTAL</b>	<b>67</b>	<b>743</b>	<b>38</b>	<b>288</b>	<b>19</b>	<b>2</b>	<b>0</b>	<b>300</b>	<b>202</b>	<b>35</b>	<b>31</b>	<b>0</b>	<b>1725</b>
<b>Percentage of Total</b>	<b>3.88%</b>	<b>43.07%</b>	<b>2.20%</b>	<b>16.70%</b>	<b>1.10%</b>	<b>0.12%</b>	<b>0.00%</b>	<b>17.39%</b>	<b>11.71%</b>	<b>2.03%</b>	<b>1.80%</b>	<b>0.00%</b>	
<b>State Totals</b>	<b>810</b>		<b>347</b>					<b>300</b>	<b>268</b>			<b>0</b>	

**Definitions**

Substate A = Preliminary Notice of Alleged violation information has been received from the Region but no Initial Notice has been issued to FERC.

Substate B = NERC is awaiting receipt of Notice of Alleged Violation Proposed Penalty or Sanction from the Region.

Substate C = NERC has received Notice of Alleged Violation Proposed Penalty or Sanction and is awaiting acceptance, auto acceptance or contest.

Substate D = Region received acceptance letter from Registered Entity, or 30 day clock expired and violation is Auto Accepted and is now Confirmed.

Substate E = Region has received letter contesting violation from Registered Entity.

Substate F = Region has received request for Hearing from Registered Entity.

Substate G = NERC has received request for Appeal from Registered Entity.

Substate H = NERC has received a Notice of Confirmed Violation from the Region.

Substate I = Violation is Confirmed/Settled and a Notice of Penalty has been issued by NERC to Registered Entity and submitted to FERC.

Substate J = Payment of Penalties, Fulfillment of Sanctions, Completion of Mitigation Plan, Exhaustion of Administrative and Judicial Remedies, and Fulfillment of Settlement terms have all been met and violation is closed.

Substate K = Settlement negotiations are in progress.

Substate L = NERC has received a Settlement Agreement from the Region.

\* Includes new violations received through 1/31/2009.

Report Date: 2/3/2009

### Summary of all Post June 18<sup>th</sup> Alleged Violations by Region

Below is a breakdown, as of January 31, 2009 of the Compliance Monitoring and Enforcement (CMEP) alleged violation summary for all 2471 violations.

	Dismissed	Previously Closed	Newly Closed	Total FERC Enforceable	% Non-Document Related	Total Canadian Violations	Total
FRCC	5	0	0	129	52%	0	134
MRO	14	7	0	48	46%	7	76
NPCC	9	12	0	38	50%	3	62
RFC	14	1	0	107	64%	0	122
SERC	33	70	0	155	94%	0	258
SPP	1	5	0	58	81%	0	64
TRE	3	10	0	55	82%	0	68
WECC	550	0	0	1135	50%	2	1687
<b>TOTAL</b>	<b>629</b>	<b>105</b>	<b>0</b>	<b>1725</b>	<b>57%</b>	<b>12</b>	<b>2471</b>

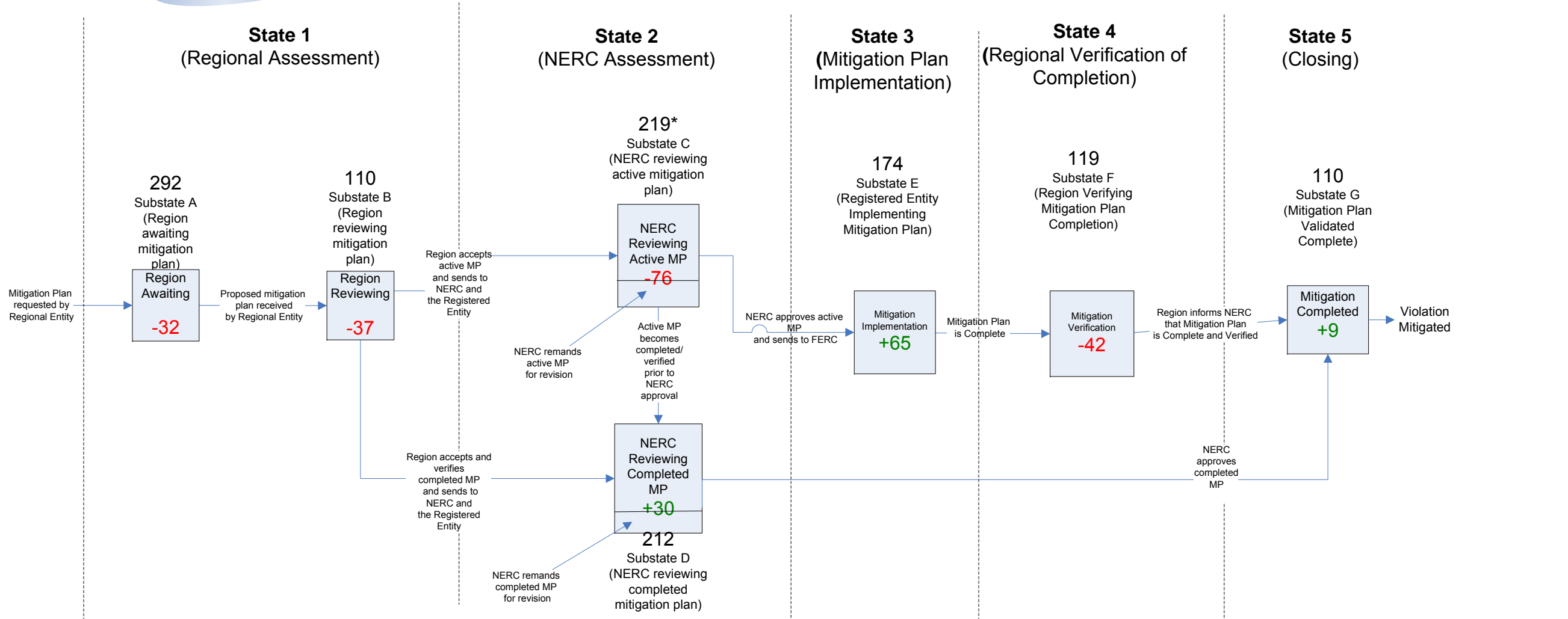
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Includes new violations received through 1/31/2009.

Report Date: 2/3/2009

# Mitigation Process States and Underlying Process Substates

Snapshot comparison between January 1, 2009 and January 31, 2009



### Mitigation Plans Process State Table — Active FERC Enforceable Alleged Violations

Below is a breakdown, as of January 31, 2009, of the Compliance Monitoring and Enforcement Program (CMEP) Mitigation Plan “state” summary for the 1236 active violations.

Region	State 1 (Regional Assessment)		State 2 (NERC Assessment)			State 3 (Mitigation Plan Implementation)	State 4 (Regional Verification of Completion)	State 5 (Closing)	Total
	Substate A	Substate B	Substate C		Substate D	Substate E	Substate F	Substate G	
	Region Awaiting	Region Reviewing	Accepted MP Not Received from Region	NERC Reviewing Active MP	NERC Reviewing Completed MP	Registered Entity Implementation	Regional Verification of MP Completion	Mitigation Plan Validated Complete	
FRCC	8	1	2	24	17	10	18	4	84
MRO	3	0	0	6	1	0	2	0	12
NPCC	30	0	0	0	0	0	2	0	32
RFC	41	0	0	3	0	20	19	0	83
SERC	47	3	0	17	12	4	42	0	125
SPP	4	0	0	0	1	30	3	0	38
TRE	34	0	0	0	0	6	1	0	41
WECC	125	106	46	121	181	104	32	106	821
<b>TOTAL</b>	<b>292</b>	<b>110</b>	<b>48</b>	<b>171</b>	<b>212</b>	<b>174</b>	<b>119</b>	<b>110</b>	<b>1236</b>
Percentage of Total	23.62%	8.90%	3.88%	13.83%	17.15%	14.08%	9.63%	8.90%	
<b>State Totals</b>	<b>402</b>		<b>431</b>			<b>174</b>	<b>119</b>	<b>110</b>	

#### Definitions

Substate A = Region is still awaiting receipt of mitigation plan from Registered Entity.

Substate B = Region has received mitigation plan and is reviewing.

Substate C = NERC has received mitigation plan and is reviewing. Also includes any mitigation plans not yet received by NERC.

Substate D = Mitigation plan has been verified completed by the Region but is still awaiting approval by NERC.

Substate E = Mitigation plan has been approved by NERC, and sent to FERC, but has not been completed.

Substate F = Mitigation Plan has been completed per Registered Entity but is being verified by the Region.

Substate G = Mitigation plan has been verified completed by Region, has been approved by NERC, and sent to FERC.

- Includes Mitigation Plans received through 1/31/2009.
- Mitigation information reported at the violation level.

Report Date: 2/3/2009

### Mitigation Plan Summary of Pre-June 18<sup>th</sup> Violations

Below is a breakdown of the remaining unmitigated pre-June 18<sup>th</sup> violations occurring between January 2006 and June 18, 2007, by Region, updated as of January 31, 2009.

	2006 Unmitigated			2007 Unmitigated			All Years	
	Alleged	Target Date Passed	Total 2006	Alleged	Target Date Passed	Total 2007	Total Unmitigated	Under Verification
FRCC	0	0	0	9	3	10	<b>10</b>	<b>37</b>
MRO	0	0	0	0	0	0	<b>0</b>	<b>0</b>
NPCC	0	0	0	0	0	0	<b>0</b>	<b>0</b>
RFC	0	0	0	0	0	0	<b>0</b>	<b>0</b>
SERC	0	0	0	0	0	1	<b>1</b>	<b>0</b>
SPP	0	0	0	0	0	0	<b>0</b>	<b>1</b>
TRE	0	0	0	0	0	1	<b>1</b>	<b>0</b>
WECC	0	7	7	1	70	<b>100</b>	<b>107</b>	<b>9</b>
<b>TOTAL</b>	<b>0</b>	<b>7</b>	<b>7</b>	<b>10</b>	<b>73</b>	<b>112</b>	<b>119</b>	<b>47</b>

#### Definitions

Target Date Passed = Violations that are listed as “In Progress” or “To be determined” per the region’s linear spreadsheet that have an Estimated Mitigation Completion Date which has passed.

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\*WECC alleged violations are considered to be RMS violations.

Report Date: 2/3/2009

### Progress with Pre-June 18th Violation Mitigation Plans

