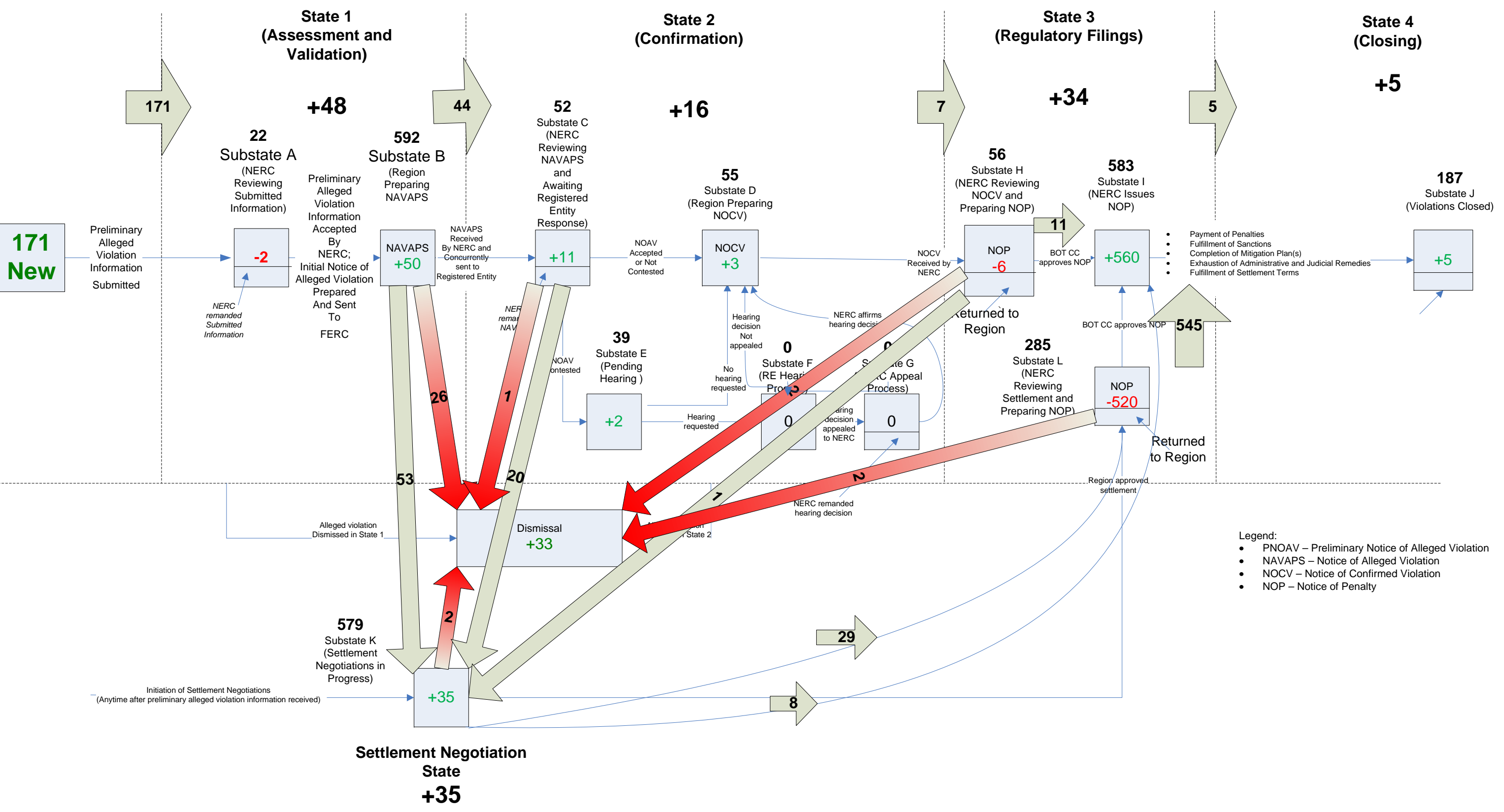


Violation Process States and Underlying Process Sub states

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



Violation Process State Summary Table — Active FERC Enforceable Alleged Violations

Below is a breakdown, as of October 31, 2009, of the Compliance Monitoring and Enforcement Program (CMEP) Violation “state” summary for the 2268 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	0	39	0	0	0	0	0	140	1	0	63	0	243
MRO	0	20	3	0	0	0	0	18	2	3	6	0	52
NPCC	0	29	0	0	0	0	0	28	0	14	0	0	71
RFC	0	61	0	0	0	0	0	38	0	52	28	0	179
SERC	7	80	0	0	0	0	0	49	0	67	12	4	219
SPP	6	37	0	5	0	0	0	51	26	2	11	0	138
TRE	0	13	7	0	0	0	0	20	5	1	4	0	50
WECC	9	281	42	50	39	0	0	235	22	146	459	1	1284
NERC	0	32	0	0	0	0	0	0	0	0	0	0	32
TOTAL	22	592	52	55	39	0	0	579	56	285	583	5	2268
Percentage of Total	0.97%	26.10%	2.29%	2.43%	1.72%	0.00%	0.00%	25.53%	2.47%	12.57%	25.71%	0.22%	
State Totals	614		146					579	924			5	

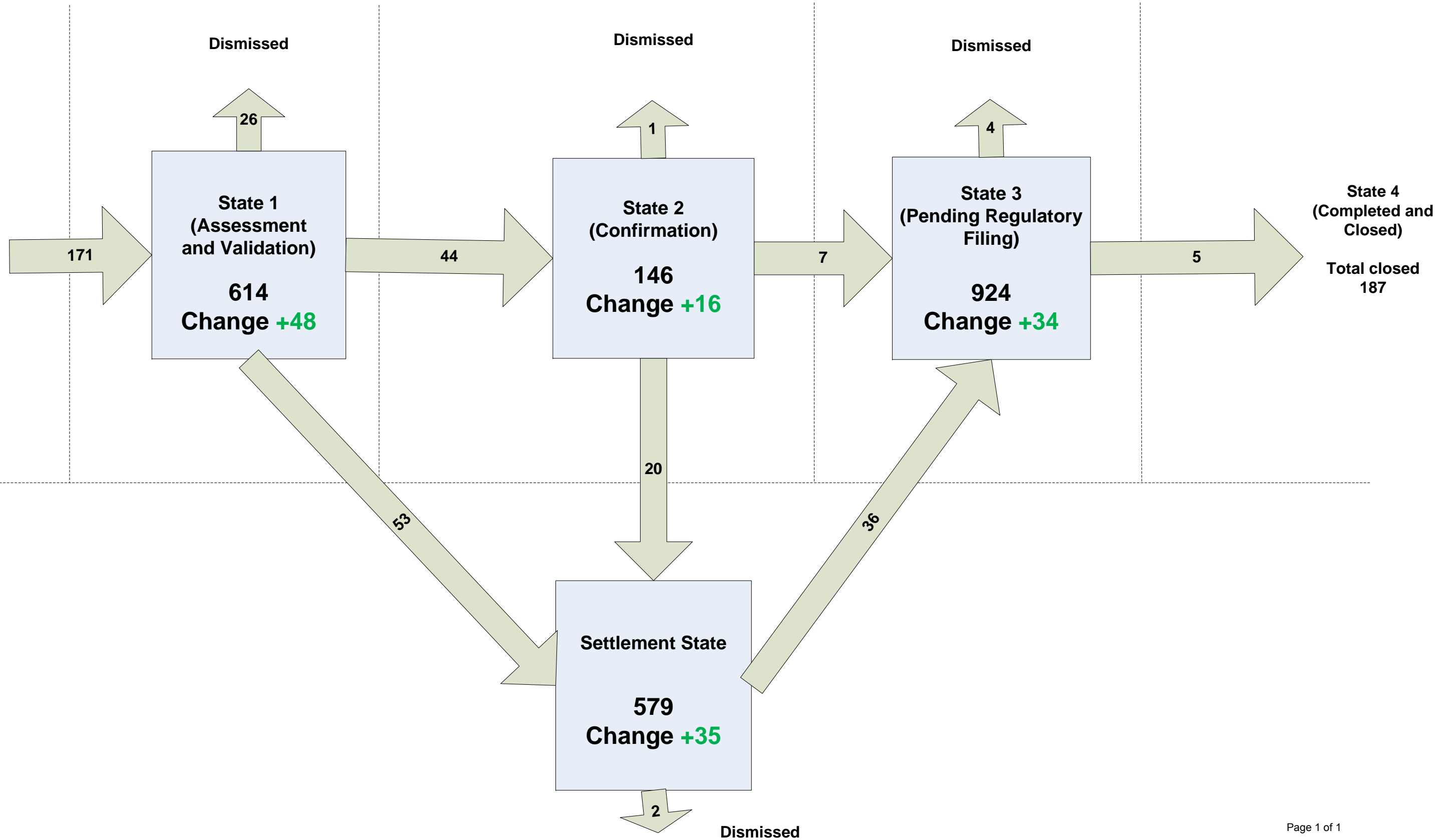
Definitions

- 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 10/31/2009.

Violation Process States

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



Pending Violations Summary by Process Steps FERC Enforceable Alleged Violations Summarized by State

Below is a breakdown, as of October 31, 2009, of the Compliance Monitoring and Enforcement Program (CMEP) Violation Process Steps summarized by State for the 2450 FERC enforceable violations.

	Assessment and Validation	Confirmation	Settlement	Pending Regulatory Filing	Completed and Closed	
Region						Total
FRCC	39	0	140	64	2	245
MRO	20	3	18	11	37	89
NPCC	29	0	28	14	17	88
RFC	61	0	38	80	2	181
SERC	87	0	49	79	98	313
SPP	43	5	51	39	7	145
TRE	13	7	20	10	23	73
WECC	290	131	235	627	1	1284
NERC	32	0	0	0	0	32
TOTAL	614	146	579	924	187	2450

* Includes new violations received through 10/31/2009.

Report Date: 11/3/2009

Summary of all Post June 18th Alleged Violations by Region

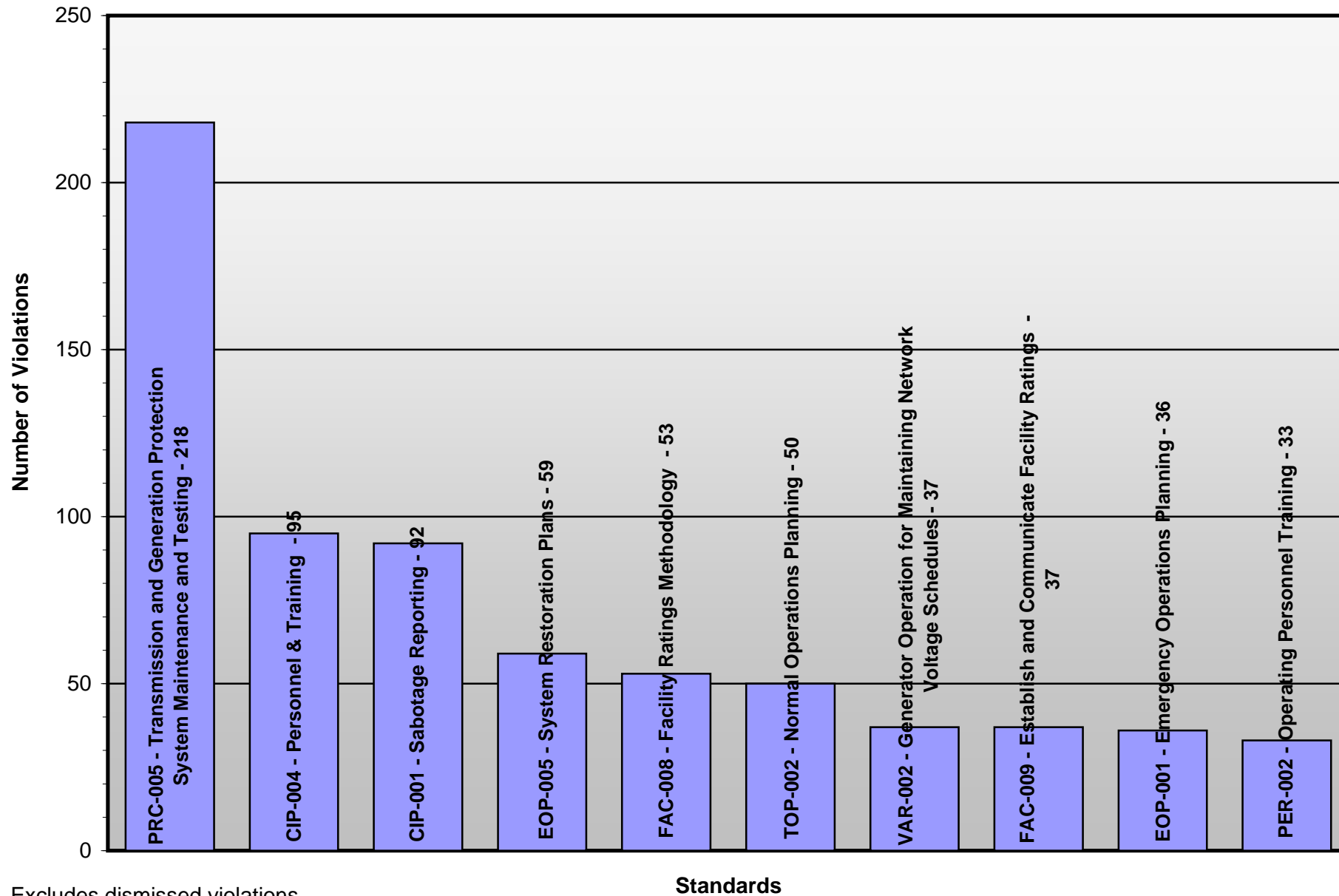
Below is a breakdown, as of October 31, 2009 of the Compliance Monitoring and Enforcement (CMEP) alleged violation summary for all 3477 violations.

	Dismissed	Previously Closed	Newly Closed	FERC Enforceable			Total Canadian Violations	Total
				Total	Normalized by Registered Entity	% Non-Document Related		
FRCC	38	2	0	243	3.42	58%	0	283
MRO	30	37	0	52	0.44	56%	7	126
NPCC	9	17	0	71	0.25	38%	5	102
RFC	25	2	0	179	0.50	69%	0	206
SERC	50	94	4	215	0.94	58%	0	363
SPP	5	7	0	138	1.18	57%	0	150
TRE	7	23	0	50	0.23	78%	0	80
WECC	846	0	1	1283	2.72	55%	2	2132
NERC	3	0	0	32	10.67	94%	0	35
TOTAL	1013	182	5	2263	1.21	57%	14	3477

Includes new violations received through 10/31/2009.

Report Date: 11/3/2009

Top 10 FERC Enforceable Standards (Submit Dates: 11/1/2008 thru 10/31/2009)

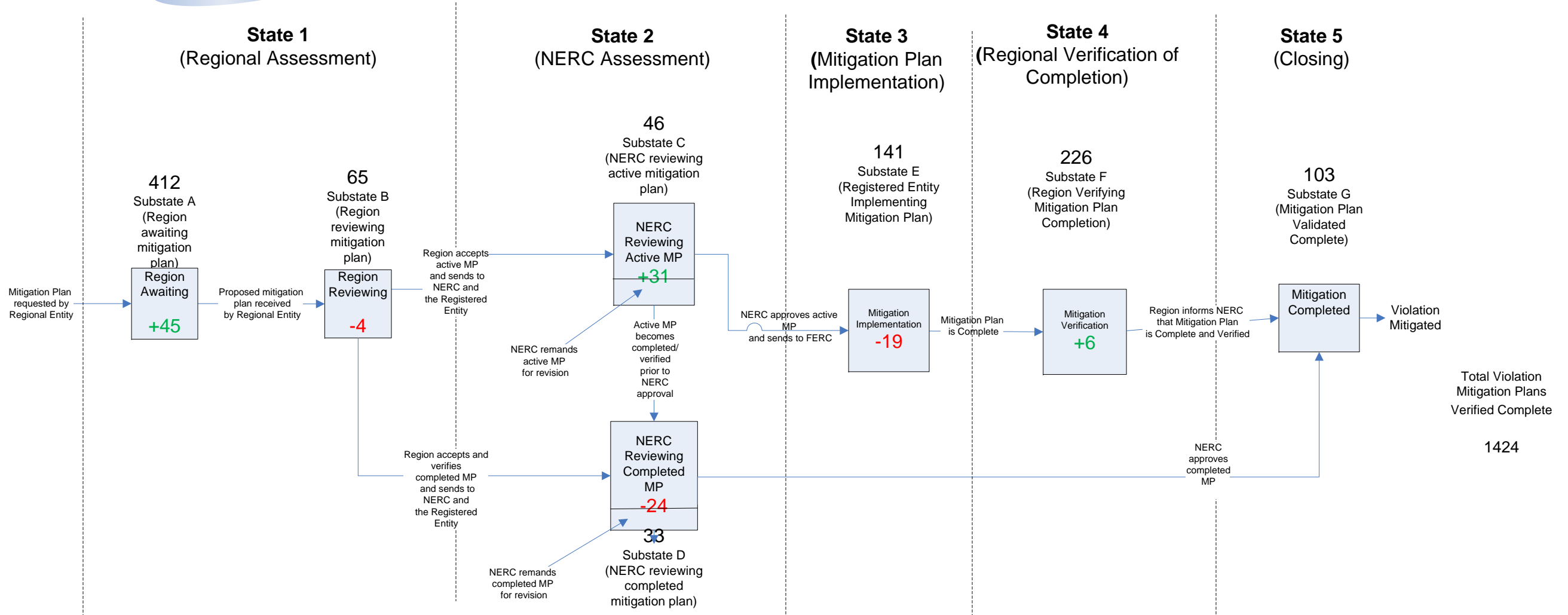
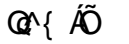


Excludes dismissed violations.

Report Date: 11/3/2009

Mitigation Process States and Underlying Process Substates

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



Mitigation Plans Process State Table — Active FERC Enforceable Alleged Violations

Below is a breakdown, as of October 31, 2009, of the Compliance Monitoring and Enforcement Program (CMEP) Mitigation Plan “state” summary for the 1026 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	55	28	2	5	3	7	27	5	132
MRO	28	0	0	2	1	1	2	4	38
NPCC	21	2	0	0	0	2	37	0	62
RFC	51	0	0	4	0	6	69	5	135
SERC	87	3	0	4	2	2	32	0	130
SPP	54	0	0	20	0	16	19	0	109
TRE	22	0	0	2	0	9	0	0	33
WECC	69	28	0	7	27	98	40	86	355
NERC	25	4	0	0	0	0	0	3	32
TOTAL	412	65	2	44	33	141	226	103	1026
State Totals	477		79			141	226	103	

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 10/31/2009.
- Mitigation information reported at the violation level.

Mitigation Plan Summary of Pre-June 18th Violations

Below is a breakdown of the remaining unmitigated pre-June 18th violations occurring between January 2006 and June 17, 2007, by Region, updated as of October 31, 2009.

	2007 Unmitigated	
	Total Unmitigated	Under Verification
FRCC	0	0
MRO	0	0
NPCC	0	0
RFC	0	0
SERC	0	0
SPP	0	0
TRE	0	0
WECC	2	0
TOTAL	2	0

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.

Report Date: 11/3/2009

Progress with Pre-June 18th Violation Mitigation Plans

