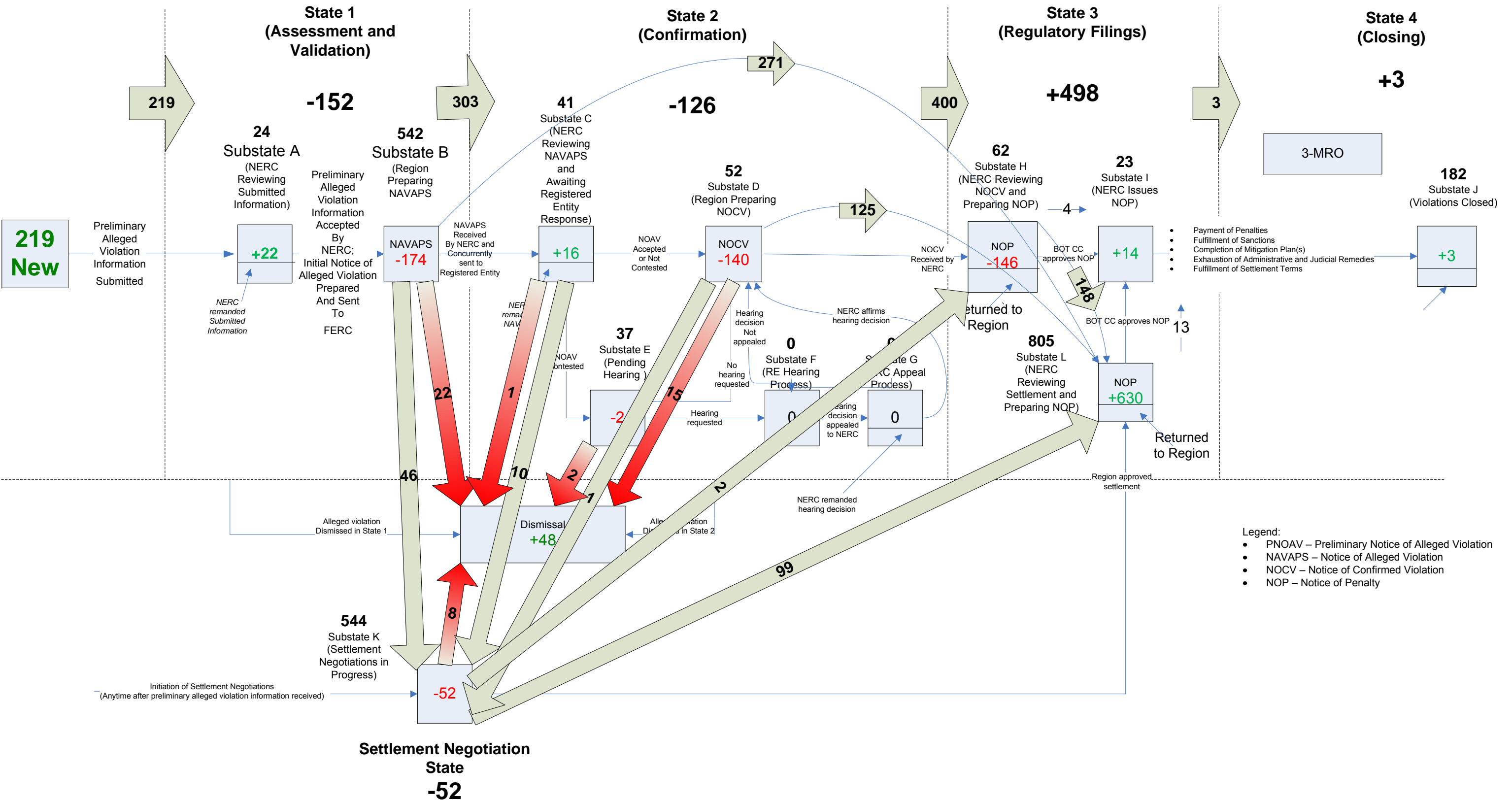


# Violation Process States and Underlying Process Sub states

Snapshot comparison between September 1, 2009 and September 30, 2009



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

Below is a breakdown, as of September 30, 2009, of the Compliance Monitoring and Enforcement Program (CMEP) Violation “state” summary for the 2133 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 Repsonse)	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	12	17	0	0	0	0	0	138	1	63	0	0	231
MRO	0	15	3	0	0	0	0	15	2	9	0	3	47
NPCC	0	22	0	0	0	0	0	28	0	14	0	0	64
RFC	7	54	0	0	0	0	0	35	12	53	4	0	165
SERC	0	61	0	0	0	0	0	55	0	58	13	0	187
SPP	5	52	3	5	0	0	0	21	28	12	0	0	126
TRE	0	13	7	0	0	0	0	20	5	1	4	0	50
WECC	0	286	28	47	37	0	0	232	14	595	2	0	1241
NERC	0	22	0	0	0	0	0	0	0	0	0	0	22
<b>TOTAL</b>	<b>24</b>	<b>542</b>	<b>41</b>	<b>52</b>	<b>37</b>	<b>0</b>	<b>0</b>	<b>544</b>	<b>62</b>	<b>805</b>	<b>23</b>	<b>3</b>	<b>2133</b>
<b>Percentage of Total</b>	<b>1.13%</b>	<b>25.41%</b>	<b>1.92%</b>	<b>2.44%</b>	<b>1.73%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>25.50%</b>	<b>2.91%</b>	<b>37.74%</b>	<b>1.08%</b>	<b>0.14%</b>	
<b>State Totals</b>	<b>566</b>		<b>130</b>					<b>544</b>	<b>890</b>			<b>3</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.

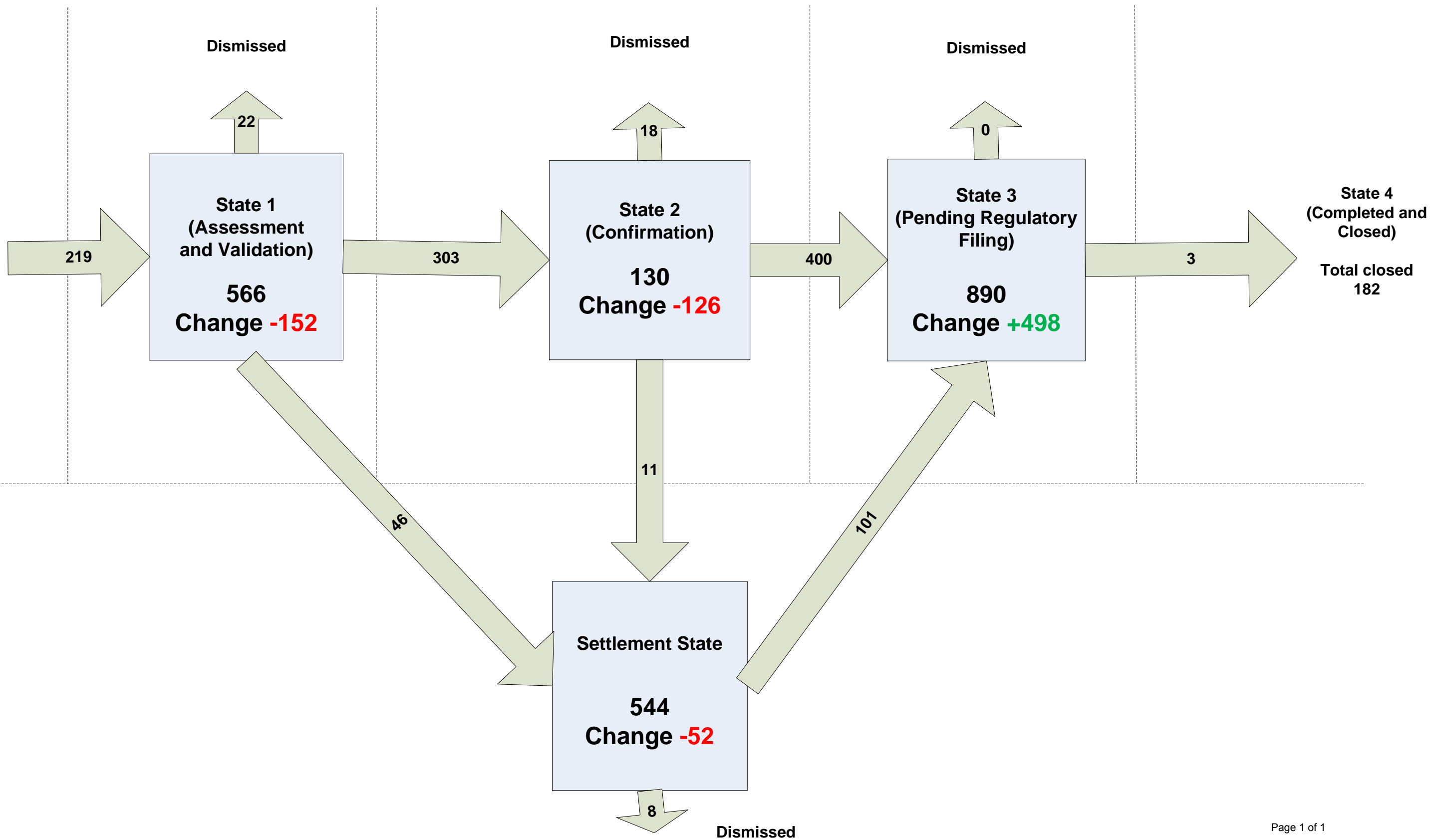
Substate K = Settlement negotiations are in progress.

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

\* Includes new violations received through 9/30/2009.

# Violation Process States

Snapshot comparison between September 1, 2009 and September 30, 2009



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

Below is a breakdown, as of September 30, 2009, of the Compliance Monitoring and Enforcement Program (CMEP) Violation Process Steps summarized by State for the 2312 FERC enforceable violations.

	Assessment and Validation	Confirmation	Settlement	Pending Regulatory Filing	Completed and Closed	
Region						Total
FRCC	29	0	138	64	2	233
MRO	15	3	15	11	37	81
NPCC	22	0	28	14	17	81
RFC	61	0	35	69	2	167
SERC	61	0	55	71	94	281
SPP	57	8	21	40	7	133
TRE	13	7	20	10	23	73
WECC	286	112	232	611	0	1241
NERC	22	0	0	0	0	22
<b>TOTAL</b>	<b>566</b>	<b>130</b>	<b>544</b>	<b>890</b>	<b>182</b>	<b>2312</b>

\* Includes new violations received through 9/30/2009.

Report Date: 10/2/2009

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

Below is a breakdown, as of September 30, 2009 of the Compliance Monitoring and Enforcement (CMEP) alleged violation summary for all 3306 violations.

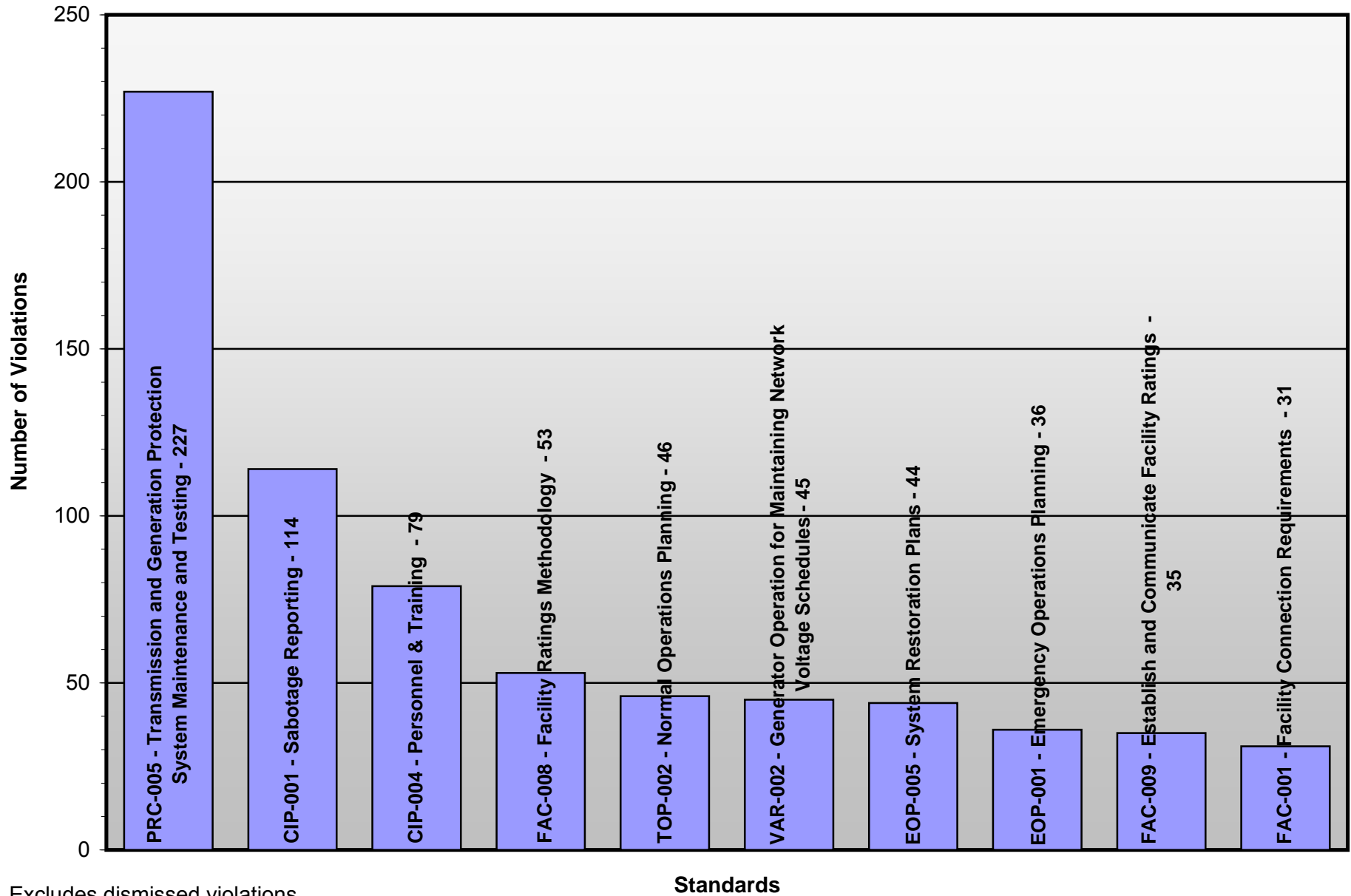
	Dismissed	Previously Closed	Newly Closed	FERC Enforceable			Total Canadian Violations	Total
				Total	Normalized by Registered Entity	% Non-Document Related		
FRCC	38	2	0	231	3.25	57%	0	271
MRO	29	34	3	44	0.37	64%	7	117
NPCC	9	17	0	64	0.22	41%	5	95
RFC	19	2	0	165	0.46	70%	0	186
SERC	46	94	0	187	0.82	56%	0	327
SPP	2	7	0	126	1.11	60%	0	135
TRE	7	23	0	50	0.23	78%	0	80
WECC	827	0	0	1241	2.65	55%	2	2070
NERC	3	0	0	22	7.33	100%	0	25
<b>TOTAL</b>	<b>980</b>	<b>179</b>	<b>3</b>	<b>2130</b>	<b>1.14</b>	<b>58%</b>	<b>14</b>	<b>3306</b>

---

Includes new violations received through 9/30/2009.

Report Date: 10/2/2009

**Top 10 FERC Enforceable Standards  
(Submit Dates: 10/1/2008 thru 9/30/2009)**

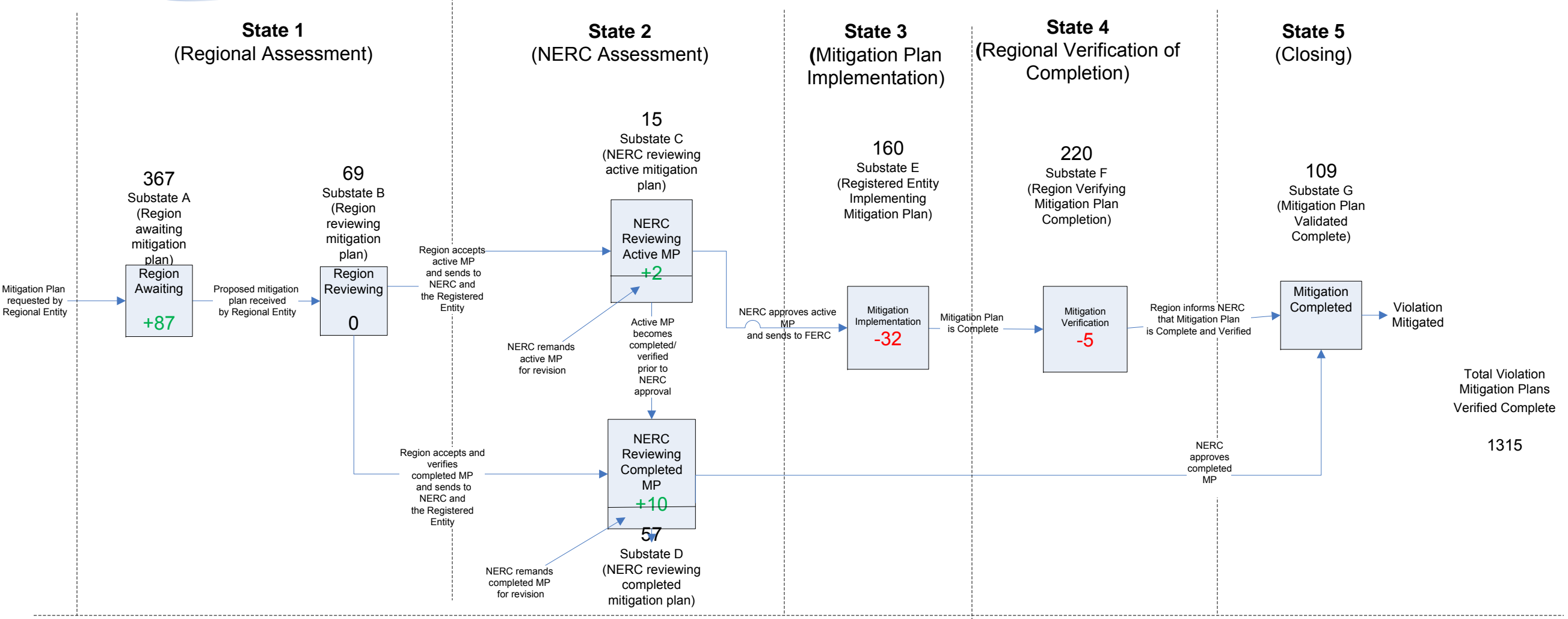


Excludes dismissed violations.

Report Date: 10/2/2009

# Mitigation Process States and Underlying Process Substates

Snapshot comparison between September 1, 2009 and September 30, 2009



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

Below is a breakdown, as of September 30, 2009, of the Compliance Monitoring and Enforcement Program (CMEP) Mitigation Plan “state” summary for the 997 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	50	28	0	4	2	7	29	6	126
MRO	25	0	0	0	1	0	4	1	31
NPCC	14	2	0	0	0	19	20	0	55
RFC	47	0	0	0	0	5	69	0	121
SERC	57	5	0	1	2	9	24	0	98
SPP	59	0	0	3	0	16	19	0	97
TRE	22	0	0	2	0	9	0	1	34
WECC	74	31	0	5	52	95	55	101	413
NERC	19	3	0	0	0	0	0	0	22
<b>TOTAL</b>	<b>367</b>	<b>69</b>	<b>0</b>	<b>15</b>	<b>57</b>	<b>160</b>	<b>220</b>	<b>109</b>	<b>997</b>
<b>State Totals</b>	<b>436</b>		<b>72</b>			<b>160</b>	<b>220</b>	<b>109</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 9/30/2009.
- Mitigation information reported at the violation level.



### 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 17, 2007, by Region, updated as of September 30, 2009.

	2007 Unmitigated		All Years	
	Target Date Passed	Total 2007	Total Unmitigated	Under Verification
FRCC	1	1	<b>1</b>	<b>2</b>
MRO	0	0	<b>0</b>	<b>0</b>
NPCC	0	0	<b>0</b>	<b>0</b>
RFC	0	0	<b>0</b>	<b>0</b>
SERC	0	0	<b>0</b>	<b>0</b>
SPP	0	0	<b>0</b>	<b>0</b>
TRE	0	0	<b>0</b>	<b>0</b>
WECC	0	2	<b>2</b>	<b>1</b>
<b>TOTAL</b>	<b>1</b>	<b>3</b>	<b>3</b>	<b>3</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.

---

Report Date: 10/2/2009

# Progress with Pre-June 18th Violation Mitigation Plans

Item J

