

December 29, 2016

VIA ELECTRONIC FILING

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

**Re: NERC Full Notice of Penalty regarding Unidentified Registered Entity
FERC Docket No. NP17- _000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Notice of Penalty¹ regarding Unidentified Registered Entity (URE) 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)).²

NERC is filing this Notice of Penalty with the Commission because Western Electricity Coordinating Council (WECC) and URE have entered into a Settlement Agreement to resolve all outstanding issues arising from WECC's determination and findings of 31 violations of Critical Infrastructure Protection (CIP) Reliability Standards.

According to the Settlement Agreement, URE agrees and stipulates to the violations, and has agreed to remedies and actions to mitigate the instant violations and facilitate future compliance under the terms and conditions of the Settlement Agreement.

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 (2016). *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 See 18 C.F.R § 39.7(c)(2) and 18 C.F.R § 39.7(d).

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Statement of Findings Underlying the Violations

This Notice of Penalty incorporates the findings and justifications set forth in the Settlement Agreement, by and between WECC and URE. The details of the findings 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 (2016), NERC provides the following summary table identifying each violation of a Reliability Standard resolved by the Settlement Agreement. Further information on the subject violations is set forth in the Settlement Agreement and herein.

*SR = Self-Report / SC = Self-Certification / CA = Compliance Audit / SPC = Spot Check / CI = Compliance Investigation

NERC Violation ID	Standard	Req	VRF/ VSL	Applicable Function(s)	Discovery Method*	Risk	Penalty Amount
WECC201002377	CIP-003-1	R5	Lower/ Severe	GO, GOP	SC	Moderate	No Penalty
WECC201002208	CIP-004-1	R2	Medium/ Severe		SC	Moderate	
WECC201002209	CIP-004-1	R3	Medium/ Severe		SC	Moderate	
WECC201002210	CIP-004-1	R4	Medium/ Severe		SC	Moderate	
WECC2015014575	CIP-004-3	R2	Lower/ Severe		SR	Moderate	
WECC201002218	CIP-005-1	R1	Lower/ Severe		SC	Moderate	
WECC201002219	CIP-005-1	R2	Lower/ Severe		SC	Moderate	
WECC201002220	CIP-005-1	R3	Medium/ Severe		SC	Moderate	
WECC201002221	CIP-005-1	R4	Lower/ Severe		SC	Moderate	

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NERC Violation ID	Standard	Req	VRF/ VSL	Applicable Function(s)	Discovery Method*	Risk	Penalty Amount
WECC201002222	CIP-005-1	R5	Medium/ Severe	GO, GOP	SC	Minimal	No Penalty
WECC201002167	CIP-006-1	R2	Medium/ Severe		SC	Moderate	
WECC201002205	CIP-006-1	R3	Medium/ Severe		SC	Moderate	
WECC201002206	CIP-006-1	R4	Lower/ Severe		SC	Moderate	
WECC201002207	CIP-006-1	R5	Lower/ Severe		SC	Minimal	
WECC201002211	CIP-006-1	R6	Medium/ Severe		SC	Moderate	
WECC201002168	CIP-007-1	R1	Medium/ Severe		SC	Moderate	
WECC201002204	CIP-007-1	R2	Medium/ Severe		SC	Moderate	
WECC201002212	CIP-007-1	R3	Lower/ Severe		SC	Moderate	
WECC201002223	CIP-007-1	R4	Medium/ Severe		SC	Moderate	
WECC201002224	CIP-007-1	R5	Medium/ Severe		SC	Moderate	
WECC201002225	CIP-007-1	R6	Medium/ Severe		SC	Moderate	
WECC201002226	CIP-007-1	R7	Lower/ Severe		SC	Moderate	

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NERC Violation ID	Standard	Req	VRF/ VSL	Applicable Function(s)	Discovery Method*	Risk	Penalty Amount
WECC201002227	CIP-007-1	R8	Medium/ Severe	GO, GOP	SC	Moderate	No Penalty
WECC201002228	CIP-007-1	R9	Lower/ Severe		SC	Minimal	
WECC2014013600	CIP-007-3a	R6	Lower/ Severe		SC	Minimal	
WECC2015015127	CIP-007-3a	R6	Medium/ Severe		SR	Minimal	
WECC201002213	CIP-009-1	R1	Medium/ Severe		SC	Moderate	
WECC201002214	CIP-009-1	R2	Lower/ Severe		SC	Minimal	
WECC201002215	CIP-009-1	R3	Lower/ Severe		SC	Minimal	
WECC201002216	CIP-009-1	R4	Lower/ Severe		SC	Minimal	
WECC201002217	CIP-009-1	R5	Lower/ Severe		SC	Minimal	

Common Risk Statement for all Violations

WECC determined the risk that each violation posed to the reliability of the bulk power system (BPS) as shown in the chart above. Although URE had not implemented all processes to become compliant with the requirements of the CIP Reliability Standards, WECC confirmed that URE was following government-issued guidelines that mitigated URE’s risk.

Common Duration for 28 Violations

WECC determined the duration of all the violations except for WECC2014013600, WECC2015014575, and WECC2015015127 to be approximately two months to three years, from the date when each Reliability Standard became mandatory and enforceable on URE, through when URE completed each associated Mitigation Plan.

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Common Certification and Verification Information for all Violations

URE certified that it had completed each Mitigation Plan, and WECC verified that URE had completed all mitigation activities

WECC201002377 CIP-003-1 R5 - OVERVIEW

WECC determined that URE failed to document and implement a program for managing access to protected Critical Cyber Asset (CCA) information, as required.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to:

1. Create documentation to show the chain of authority and applicability to authorize information about and access to CCAs;
2. Identify personnel by name, title, and the information for which they are responsible for authorizing access;
3. Verify the list of personnel responsible for authorizing access to protected information at least annually;
4. Review at least annually the access privileges to protected information to confirm that access privileges are correct and that they correspond with URE's needs and appropriate personnel roles and responsibilities; and
5. Assess and document at least annually the processes for controlling access privileges to protected information.

WECC201002208, WECC201002209, and WECC201002210 CIP-004-1 R2, R3, and R4 - OVERVIEW

WECC determined that URE failed to: (1) establish, maintain, and document an annual training program for cyber security for personnel having authorized cyber or authorized unescorted physical access to CCAs, and review the program annually and update as necessary; (2) document a personnel risk assessment (PRA) 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; and (3) maintain lists of personnel with authorized cyber or authorized unescorted physical access to CCAs, including their specific electronic and physical access rights to CCAs.

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URE submitted its Mitigation Plan to address the referenced violations, which required URE to:

1. Identify outstanding entity contracts that require wording modification to mandate the training of contractor and service personnel that require unescorted physical or cyber access to entity CCAs;
2. Develop contract verbiage that includes requirements for CCA training and PRA requirements;
3. Complete the training of any entity, contractor, and service personnel requiring unescorted physical or cyber access to entity CCAs; and
4. Update lists of entity, contractor, and service personnel training of personnel requiring unescorted physical or cyber access to all facilities' CCAs.

WECC2015014575 CIP-004-3 R2 - OVERVIEW

WECC determined that URE failed to maintain an annual accurate list of individuals who had cyber security training.

WECC determined the duration of the violation to be approximately 3 years and 9 months, from the date when the first instance of the missing document occurred, through when URE completed its Mitigation Plan.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to:

1. Include a work order in URE's facility and equipment maintenance program to task the local reliability compliance coordinator to review the Physical Security Perimeter (PSP) access list on a monthly basis to assure that both training and background checks are current and valid. The evaluation process will highlight when an individual's training, background check, or identity verification are close to expiration to assure that the individual is either brought into compliance or removed from the access list; and
2. Perform an analysis of one facility's PSP access list to include employees, contractors, volunteers, and other entity personnel and notify the affected personnel that they require training to remain on the PSP access list.

WECC201002218 CIP-005-1 R1 - OVERVIEW

WECC determined that URE failed to ensure that every CCA resides within an Electronic Security Perimeter (ESP), and identify and document the ESPs and all access points to the perimeters.

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URE submitted its Mitigation Plan to address the referenced violation, which required URE to:

1. Review each human machine interface system with the facility personnel and identify the CCAs and the ESP for each system;
2. Verify that the CCAs of each system are within an ESP;
3. Identify the access points to each ESP;
4. Update network diagrams, on separate documents, to show each system's ESP and access points;
5. Review the electronic logging narrative;
6. Review and modify the shared account review procedure;
7. Review and modify the shared account logging procedure;
8. Review and modify the electronic access procedure;
9. Review and modify the existing password narrative; and
10. Update all documents associated.

WECC201002219 and WECC201002221 CIP-005-1 R2 and R4 - OVERVIEW

WECC determined that URE failed to: (1) implement and document the organizational processes and technical and procedural mechanisms for control of electronic access at all access points to the ESP; and (2) perform a Cyber Vulnerability Assessment (CVA) of the electronic access points to the ESPs at least annually.

URE submitted its Mitigation Plans to address the referenced violations, which required URE to:

1. Specify and place purchase order for hardware and software to implement firewalls for multiplexer, digital exciter, and station service human machine interface systems;
2. Specify and place purchase order for hardware and software to replace certain hardware software at facilities;
3. Install, configure, and commission firewall hardware and software for two facilities;
4. Upgrade and incorporate hardware and software into the supervisory control and data acquisition system for two facilities;
5. Install, configure, and commission firewall hardware and software for facilities' multiplexers, digital exciters, and human machine interface systems;

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6. Complete electronic access documentation, including electronic access control, of multiplexers, digital exciters, and human machine interface systems; and
7. Modify the generic data acquisition and control system (GDACS) electronic access documentation package, including electronic access control.

WECC201002220 CIP-005-1 R3 - OVERVIEW

WECC determined that URE failed to implement and document an electronic or manual process for monitoring and logging access at access points to ESPs 24 hours a day, seven days a week.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to:

1. Implement and document an electronic or manual process for monitoring and logging access at access points to the ESPs 24 hours a day, seven days a week; and
2. Implement a process, where technically feasible, in which the security monitoring process detects and alerts attempts at, or actual, unauthorized accesses. These alerts will provide for appropriate notification to designated response personnel. Where alerting is not technically feasible, review or otherwise assess access logs for attempts at, or actual, unauthorized accesses at least every 90 days.

WECC201002222 CIP-005-1 R5 - OVERVIEW

WECC determined that URE failed to review, update, and maintain all documentation to support compliance with the requirements of the Reliability Standard.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to verify that there is sufficient verbiage for the direction and review of documentation related to the Reliability Standard at least annually. If changes are necessary, URE's Mitigation Plan required URE to make relevant changes and submit the revised document for approval and signature.

WECC201002167, WECC201002205, WECC201002206, WECC201002207, and WECC201002211
CIP-006-1 R2, R3, R4, R5, and R6 - OVERVIEW

WECC determined that URE failed to: (1) document and implement the operational and procedural controls to manage physical access at all access points to the PSPs 24 hours a day, seven days a week; (2) document and implement the technical and procedural controls for monitoring physical access at all access points to the PSPs 24 hours a day, seven days a week; (3) record sufficient information to identify uniquely individuals and the time of access 24 hours a day, seven days a week, and failed to implement and document the technical and procedural mechanisms for logging physical entry at all

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access points to the PSP; (4) retain physical access logs for at least 90 calendar days; and (5) implement a maintenance and testing program to ensure that all physical security systems under the Reliability Standard function properly.

URE submitted its Mitigation Plans to address the referenced violations, which required URE to:

1. Verify that all CCAs are contained in a PSP;
2. Verify that all access points to the PSP are identified;
3. Install additional proximity devices and associated doorway modifications;
4. Follow up on construction to mediate outstanding physical access issues;
5. Update security system test and maintenance documentation, including ports and services minimization, recovery plan, electronic access controls and monitoring, and incident response and recovery plan;
6. Complete PRA for all individuals granted cyber or unescorted physical access to physical security systems equipment;
7. Document the appropriate use of physical access controls;
8. Implement and document methods and procedures to identify and log individual's time of access to the PSP;
9. Implement and document technical and physical controls for monitoring physical access to the PSP at all access points on a 24 hours a day, seven days a week basis;
10. Document process tools and procedures to monitor physical access to the PSP;
11. Procure and develop a Physical Access Control System;
12. Request Technical Feasibility Exceptions (TFEs) for the method of controlling access to the roof at one location; and
13. Update URE's policy documents for cyber security.

WECC201002168 CIP-007-1 R1 - OVERVIEW

WECC determined that URE failed to ensure that new Cyber Assets and significant changes to existing Cyber Assets within the ESP do not adversely affect existing cyber security controls.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to test the following: GDACS master station; GDACS database server; GDACS Inter-control Center Communications Protocol (ICCP) server; GDACS domain controller; GDACS engineering station; GDACS operator view

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station; GDACS engineering station; GDACS maintenance laptop; GDACS manager; event logger; and human machine interface systems.

WECC201002204 CIP-007-1 R2 - OVERVIEW

WECC determined that URE failed to establish and document a process to ensure that only those ports and services required for normal and emergency operations were enabled.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to:

1. Establish, document, and implement a process to ensure that only those ports and services required for normal and emergency operations are enabled;
2. Enable only those ports and services required for normal and emergency operations;
3. Disable other ports and services; and
4. File TFEs for appropriate devices.

WECC201002212 CIP-007-1 R3 - OVERVIEW

WECC determined that URE failed to establish and document a program for security patch management for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the ESPs.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to:

1. Document and implement a program for security patch management;
2. Assess security patches for applicability within 30 days of being made available;
3. Test and implement the security patches; and
4. Document compensating measures if URE does not install applicable patches.

WECC201002223 CIP-007-1 R4 - OVERVIEW

WECC determined that URE failed to use anti-virus software and other malicious software or 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 ESP.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to document the process for implementing anti-virus and anti-malware tools and signatures.

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WECC201002224 CIP-007-1 R5 - OVERVIEW

WECC determined that URE failed to 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.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to:

1. Review and modify existing narrative in URE's cyber security policy document and/or the document for compliance with the Reliability Standard to more clearly describe electronic logging, include the process for shared accounts, describe the process for logging the use of shared accounts, and describe the process for documenting password changing for audit purposes;
2. Ensure that each plant has an updated list documenting all levels of electronic access, including shared accounts; and
3. Update and finalize URE's policy document for cyber security and/or the document for compliance with the Reliability Standard.

WECC201002225 CIP-007-1 R6 - OVERVIEW

WECC determined that URE failed to ensure that all Cyber Assets within the ESP, as technically feasible, implement automated tools or organizational process controls to monitor system events related to cyber security.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to:

1. Procure additional software licenses for the Cyber Assets capable of producing cyber security logs; and
2. Install the licenses at its facility and configure the agents for monitoring.

WECC201002226 CIP-007-1 R7 - OVERVIEW

WECC determined that URE failed to establish formal methods, processes, and procedures for disposal or redeployment of Cyber Assets within the ESPs as identified and documented in the Reliability Standard.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to document and implement the process for disposing or redeploying Cyber Assets within the ESP, and maintain records for the same.

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WECC201002227 CIP-007-1 R8 - OVERVIEW

WECC determined that URE failed to perform a CVA of all Cyber Assets within the ESP at least annually as required.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to:

1. Complete the firewall system at its facility;
2. Complete the cyber security documentation, including the CVA, for the human machine interface system at all facilities;
3. Evaluate, design, procure, and implement certain systems at its facilities;
4. Update the GDACS security documentation package to include certain systems at its facilities;
and
5. Perform CVAs on all cyber systems.

WECC201002228 CIP-007-1 R9 - OVERVIEW

WECC determined that URE failed to review and update the documentation specified in the Reliability Standard at least annually, as required.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to review and update the documentation related to the Reliability Standard.

WECC2014013600 CIP-007-3a R6 - OVERVIEW

WECC determined that URE failed to implement and document the organizational processes and technical and procedural mechanisms for monitoring for security events on all Cyber Assets within the ESP.

WECC determined the duration of the violation to be approximately 1 month, from the date when the device to log events to the centralized logging servers at URE's facility failed, through when URE completed its Mitigation Plan.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to:

1. Verify that logs are being retrieved from ICCP servers; and
2. Add a checklist to patch set installation instructions to verify that all devices where URE installs the patch continue to log to the centralized logging servers correctly.

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WECC2015015127 CIP-007-3a R6 - OVERVIEW

WECC determined that URE failed to ensure that it monitored all Cyber Assets within the ESP for security events.

WECC determined the duration of the violation to be approximately 5 weeks, from the date when URE made upgrades at its facility without ensuring the monitoring of all Cyber Assets within the ESP for security events, through when URE completed its Mitigation Plan.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to:

1. Update notification rules for certain cyber alerts and test the alerts in the GDACS test bed;
2. Provide updated centralized logging servers notification rules for the engineering station, and document the installation procedure and contact each point of contact at the facility;
3. Obtain and review the centralized logging servers' logs from its facilities to determine if certain cyber alerts would have been issued during the timeframe for which it was not working; and
4. Update the change request form so that it explicitly includes checkboxes related to the completion of all applicable Reliability Standard tests, and to modify the GDACS change request form.

WECC201002213 CIP-009-1 R1 - OVERVIEW

WECC determined that URE failed to create and annually review recovery plans for CCAs.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to create recovery plans for CCAs that include roles and responsibilities of responders based on events of varying duration and severity.

WECC201002214 CIP-009-1 R2 - OVERVIEW

WECC determined that URE failed to exercise the recovery plans at least annually.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to exercise its recovery plan.

WECC201002215 CIP-009-1 R3 - OVERVIEW

WECC determined that URE failed to: (1) update the recovery plans to reflect any changes or lessons learned as a result of an exercise or the recovery from an actual incident; and (2) communicate

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updates to personnel responsible for the activation and implementation of the recovery plans within 90 calendar days of the change.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to:

1. Verify that sufficient directions exist to ensure that the intended change control process is present at its facility; and
2. Make changes as necessary and submit the revised document for approval and signature.

WECC201002216 CIP-009-1 R4 - OVERVIEW

WECC determined that URE failed to include in the recovery plans processes and procedures for the backup and storage of information required to successfully restore CCAs.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to implement procedures for the backup and storage of information required to restore CCAs.

WECC201002217 CIP-009-1 R5 - OVERVIEW

WECC determined that URE failed to test at least annually information essential to recovery that is stored on backup media to ensure that the information is available.

URE submitted its Mitigation Plan to address the referenced violation, which required URE to create a process for information essential to recovery that is stored on backup media to be tested at least annually to ensure that the information is available.

Regional Entity's Basis for Penalty

According to the Settlement Agreement, WECC has assessed no penalty for the referenced violations. WECC considered the following factors:

1. WECC considered URE's CIP compliance history to be an aggravating factor in the disposition method for the violations described in NERC Violation IDs WECC2014013600, WECC2015014575, and WECC2015015127. WECC determined that URE's compliance history was not relevant for the violations described in NERC Violation IDs WECC201002167, WECC201002168, WECC201002204, WECC201002205, WECC201002206, WECC201002207, WECC201002208, WECC201002209, WECC201002210, WECC201002211, WECC201002212, WECC201002213, WECC201002214, WECC201002215, WECC201002216, WECC201002217, WECC201002218, WECC201002219, WECC201002220, WECC201002221, WECC201002222,

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WECC201002223, WECC201002224, WECC201002225, WECC201002226, WECC201002227, WECC201002228, and WECC201002377;

2. URE voluntarily self-reported two of the violations;
3. URE was cooperative throughout the compliance enforcement process;
4. there was no evidence of any attempt to conceal a violation nor evidence of intent to do so;
5. nine violations posed a minimal, and 22 violations posed a moderate, and not a serious or substantial, risk to the reliability of the BPS; and
6. there were no other mitigating or aggravating factors or extenuating circumstances that would affect the disposition.

After consideration of the above factors, WECC determined that, in this instance, it would issue no penalty.

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Statement Describing the Assessed Penalty, Sanction or Enforcement Action Imposed³

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,⁴ the NERC BOTCC reviewed the Settlement Agreement and supporting documentation on September 29, 2016, and approved 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.

For the foregoing reasons, the NERC BOTCC approved the Settlement Agreement and believes that it is appropriate for the violations and circumstances at issue, and is consistent with NERC's goal to promote and ensure reliability of the BPS.

Pursuant to 18 C.F.R. § 39.7(e), the penalty will be effective upon expiration of the 30-day period following the filing of this Notice of Penalty with FERC, or, if FERC decides to review the penalty, upon final determination by FERC.

³ See 18 C.F.R. § 39.7(d)(4).

⁴ *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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Notices and Communications: Notices and communications with respect to this filing may be addressed to the following:

<p>Jim Robb* Chief Executive Officer Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6853 (801) 883-6894 – facsimile jrobb@wecc.biz</p> <p>Steve Goodwill* Vice President and General Counsel, Corporate Secretary Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6857 (801) 883-6894 – facsimile sgoodwill@wecc.biz</p> <p>Ruben Arredondo* Senior Legal Counsel Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 819-7674 (801) 883-6894 – facsimile rarredondo@wecc.biz</p>	<p>Sonia C. Mendonça* Vice President of Enforcement and Deputy General Counsel 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>Edwin G. Kichline* Senior Counsel and Associate Director, Enforcement North American Electric Reliability Corporation 1325 G Street N.W. Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile edwin.kichline@nerc.net</p>
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*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/ Edwin G. Kichline

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Deputy General Counsel
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Western Electricity Coordinating Council

Attachments