



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

PRIVILEGED AND CONFIDENTIAL INFORMATION
HAS BEEN REMOVED FROM THIS PUBLIC VERSION

November 30, 2010

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

**Re: NERC Abbreviated Notice of Penalty regarding Unidentified Registered Entity,
FERC Docket No. NP11-__-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Abbreviated Notice of Penalty (NOP) regarding Unidentified Registered Entity (URE), with information and details regarding the nature and resolution of the violation¹ discussed in detail in the Settlement Agreement (Attachment b) and the Disposition Document (Attachment e), in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations and orders, as well as NERC Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).²

This NOP is being filed with the Commission because SERC Reliability Corporation (SERC) and URE have entered into a Settlement Agreement to resolve all outstanding issues arising from SERC's determination and findings of the enforceable violations of CIP-002-1 Requirement (R) 2 and R4. According to the Settlement Agreement, URE admits the violations and has agreed to the assessed penalty of zero dollars (\$0), 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 SERC201000499 and SERC201000500 are being filed in accordance with the NERC Rules of Procedure and the CMEP.

¹ 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.

² *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 (2010). *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).

Statement of Findings Underlying the Violations

This NOP incorporates the findings and justifications set forth in the Settlement Agreement executed on November 23, 2010, by and between SERC and URE. The details of the findings and the basis for the penalty are set forth in the Disposition Document. This NOP 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, NERC provides the following summary table identifying each violation of a Reliability Standard resolved by the Settlement Agreement, as discussed in greater detail below.

NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Duration	Total Penalty (\$)
NOC-666	SERC201000499	CIP-002-1 ³	2	High	1/1/10-5/31/10	0
	SERC201000500	CIP-002-1 ⁴	4	Lower		

The text of the Reliability Standards at issue and further information on the subject violations are set forth in the Disposition Documents.

CIP-002-1 R2 and R4 - OVERVIEW

On March 9, 2010,⁵ URE self-reported violations of CIP-002-1 R2 and R4. SERC determined that URE, as a Load Serving Entity and Transmission Owner, failed to annually review, update or have senior management approve its list of Critical Assets.

Statement Describing the Assessed Penalty, Sanction or Enforcement Action Imposed⁶

Basis for Determination

Taking into consideration the Commission's direction in Order No. 693, the NERC Sanction Guidelines, the Commission's July 3, 2008, October 26, 2009 and August 27, 2010 Guidance Orders,⁷ the NERC BOTCC reviewed the Settlement Agreement and supporting documentation on

³ CIP-002-1 was enforceable from July 1, 2008 (for certain Responsible Entities) through March 31, 2010. CIP-002-2 is the current version of the enforceable Standard as of April 1, 2010 and CIP-002-3 will be effective October 1, 2010. The subsequent versions change the language of the original NERC Reliability Standard at R4 by requiring additional annual approval of "the risk-based assessment methodology." For consistency in the filing, CIP-002-1, the version of the Standard when the violation was discovered, is used throughout.

⁴ *Id.*

⁵ URE submitted a Self-Certification as "Compliant," but indicated in such certification that the assessment of Cyber Assets had not been conducted since June 30, 2008. From its follow up discussion regarding URE's Self-Certification, SERC suggested URE submit a Self-Report of the possible violation. While SERC recognizes the filing of the Self-Report, it did not give full credit for the Self-Report, as it was filed after the Self-Certification.

⁶ See 18 C.F.R. § 39.7(d)(4).

⁷ *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).

October 12, 2010. The NERC BOTCC approved the Settlement Agreement, including SERC's assessment of a zero dollar (\$0) financial penalty against URE 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 URE's first occurrence of violation of the subject NERC Reliability Standards;
2. SERC reported that URE was cooperative throughout the compliance enforcement process;
3. URE had a compliance program at the time of the violation which SERC considered a mitigating factor, as discussed in the Disposition Document;
4. there was no evidence of any attempt to conceal a violation nor evidence of intent to do so;
5. SERC determined that the violations did not pose a serious or substantial risk to the reliability of the bulk power system (BPS), as discussed in the Disposition Document; and
6. SERC 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 approves the Settlement Agreement and believes that the assessed penalty of zero dollars (\$0) 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 NOP with FERC, or, if FERC decides to review the penalty, upon final determination by FERC.

Request for Confidential Treatment

Information in and certain attachments to the instant Notice of Penalty include privileged and confidential information as defined by the Commission's regulations at 18 C.F.R. Part 388 and orders, as well as NERC Rules of Procedure including the NERC CMEP Appendix 4C. Specifically, this includes non-public information related to certain Reliability Standard violations, certain Regional Entity investigative files, Registered Entity sensitive business and confidential information exempt from the mandatory public disclosure requirements of the Freedom of Information Act, 5 U.S.C. 552, and should be withheld from public disclosure.

In accordance with the Commission's Rules of Practice and Procedure, 18 C.F.R. § 388.112, a non-public version of the information redacted from the public filing is being provided under separate cover.

Because certain of the attached documents are deemed “confidential” by NERC, Registered Entities and Regional Entities, NERC requests that the confidential, non-public information be provided special treatment in accordance with the above regulation.

Attachments to be included as Part of this Notice of Penalty

The attachments to be included as part of this NOP are the following documents:

- a) URE’s Self-Report for CIP-002-1 R2 and R4 dated March 9, 2010, included as Attachment a;
- b) Settlement Agreement by and between SERC and URE executed November 23, 2010, included as Attachment b;
- c) URE’s Mitigation Plan submitted March 24, 2010, included as Attachment c;
- d) URE’s Certification of Mitigation Plan Completion dated July 26, 2010, included as Attachment d; and
- e) Disposition Document and SERC’s Verification of Mitigation Plan Completion contained therein, included as Attachment e.

A Form of Notice Suitable for Publication⁸

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

⁸ See 18 C.F.R. § 39.7(d)(6).

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 David N. Cook* Sr. Vice President and General Counsel North American Electric Reliability Corporation 116-390 Village Boulevard Princeton, NJ 08540-5721 (609) 452-8060 (609) 452-9550 – facsimile david.cook@nerc.net</p>	<p>Rebecca J. Michael* Assistant General Counsel Davis Smith* Attorney North American Electric Reliability Corporation 1120 G Street, N.W. Suite 990 Washington, DC 20005-3801 (202) 393-3998 (202) 393-3955 – facsimile rebecca.michael@nerc.net davis.smith@nerc.net</p>
<p>Kenneth B. Keels, Jr.* Director of Compliance Andrea Koch* Manager of Compliance Enforcement and Mitigation SERC Reliability Corporation 2815 Coliseum Centre Drive Charlotte, NC 28217 (704) 940-8214 (704) 357-7914 – facsimile kkeels@serc1.org akoch@serc1.org</p>	<p>R. Scott Henry* President and CEO SERC Reliability Corporation 2815 Coliseum Centre Drive Charlotte, NC 28217 (704) 940-8202 (704) 357-7914 – facsimile shenry@serc1.org</p> <p>Marisa A. Sifontes* General Counsel Jacqueline E. Carmody* Legal Counsel SERC Reliability Corporation 2815 Coliseum Centre Drive, Suite 500 Charlotte, NC 28217 (704) 494-7775 (704) 357-7914 – facsimile msifontes@serc1.org jcarmody@serc1.org</p>
<p>*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.</p>	

Conclusion

Accordingly, NERC respectfully requests that the Commission accept this Abbreviated NOP as compliant with its rules, regulations and orders.

Respectfully submitted,

Gerald W. Cauley
President and Chief Executive Officer
David N. Cook
Sr. Vice President and General Counsel
North American Electric Reliability Corporation
116-390 Village Boulevard
Princeton, NJ 08540-5721
(609) 452-8060
(609) 452-9550 – facsimile
david.cook@nerc.net

/s/ Rebecca J. Michael
Rebecca J. Michael
Assistant General Counsel
Davis Smith
Attorney
North American Electric Reliability
Corporation
1120 G Street, N.W.
Suite 990
Washington, DC 20005-3801
(202) 393-3998
(202) 393-3955 – facsimile
rebecca.michael@nerc.net
davis.smith@nerc.net

cc: Unidentified Registered Entity
SERC Reliability Corporation

Attachments

Attachment e

Disposition Document and SERC's Verification of Mitigation Plan Completion contained therein

DISPOSITION OF VIOLATION¹

Dated November 23, 2010

NERC	SERC TRACKING	NOC#
TRACKING NO.	NO.	
SERC201000499	10-073	NOC-666
SERC201000500	10-074	

REGISTERED ENTITY	NERC REGISTRY ID
Unidentified Registered Entity (URE)	NCRXXXXX

REGIONAL ENTITY
SERC Reliability Corporation (SERC)

I. VIOLATION INFORMATION

RELIABILITY STANDARD	REQUIREMENT(S)	SUB-REQUIREMENT(S)	VRF*	VSL**
CIP-002-1²	2		High	High³
CIP-002-1⁴	4		Lower	High⁵

*Violation Risk Factor (“VRF”)

**Violation Severity Level (“VSL”)

¹ For purposes of this document and attachments hereto, each violation at issue is described as a “violation,” regardless of its procedural posture and whether it was a possible, alleged or confirmed violation.

² CIP-002-1 was enforceable from July 1, 2008 (for certain Responsible Entities) through March 31, 2010. CIP-002-2 is the current version of the enforceable Standard as of April 1, 2010 and CIP-002-3 will be effective October 1, 2010. The subsequent interpretations change the language of the original NERC Reliability Standard at R4 by requiring additional annual approval of “the risk-based assessment methodology.” For consistency in the filing, CIP-002-1, the version of the Standard when the violation was discovered, is used throughout.

³ SERC staff assessed a VSL of “High” for the violations of CIP-002-1 R2 and R4, as URE had developed a list of Critical Assets but the list had not been annually reviewed or updated and did not have a signed and dated record of the senior manager or delegate(s)’s annual approval of the list of Critical Assets in 2009, even though the list was ‘null.’

⁴ See n.2.

⁵ See n.3.

PURPOSE OF THE RELIABILITY STANDARD AND TEXT OF RELIABILITY STANDARD AND REQUIREMENT(S)/SUB-REQUIREMENT(S)

The purpose statement of CIP-002-1 provides in pertinent part: “...Standard CIP-002 requires the identification and documentation of the Critical Cyber Assets associated with the Critical Assets that support the reliable operation of the Bulk Electric System. These Critical Assets are to be identified through the application of a risk-based assessment.”

CIP-002-1 R2 provides:

R2. Critical Asset Identification — The Responsible Entity shall develop 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.⁶

CIP-002-1 R4 provides:

R4. Annual Approval — A senior manager or delegate(s) shall approve annually 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 list of Critical Assets and the list of Critical Cyber Assets (even if such lists are null).

VIOLATION DESCRIPTION

On July 3, 2008, URE self-certified as “Compliant” with CIP-002-1 R2 for the January 1, 2008 to June 30, 2008 reporting period. In that certification, URE stated that its assessment to identify Critical Assets was last performed on June 30, 2008. On January 15, 2009, URE self-certified as “Auditably Compliant” for the July 1, 2008 to December 31, 2008 reporting period stating that its last assessment to identify Critical Assets was performed on June 30, 2008. On August 7, 2009, URE self-certified as “Auditably Compliant” as of June 30, 2009 stating that the last assessment to identify Critical Assets was performed on June 15, 2008, even though

⁶ Within the text of Standard CIP-004, “Responsible Entity” shall mean Reliability Coordinator, Balancing Authority, Interchange Authority, Transmission Service Provider, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator, Load Serving Entity, NERC, and Regional Reliability Organizations.

its previous self-certifications listed June 30, 2008 as the last assessment.⁷ On February 2, 2010, URE again self-certified as “Auditably Compliant” as of December 31, 2009 stating that the last assessment to identify critical assets was performed on June 30, 2008.

In its review of URE’s CIP self-certification forms, SERC staff identified that, while URE had indicated it was Compliant or Auditably Compliant with CIP-002-1 R2 on four separate occasions covering reporting periods from January 1, 2008 through December 31, 2009, it had also certified that the last assessment to identify Critical Assets was performed in June 2008. CIP-002-1 R2 requires an annual application of the risk-based assessment methodology to identify Critical Assets and CIP-002-1 R4 requires that the list of Critical Assets and the list of Critical Cyber Assets be approved by senior management, thus URE’s next assessment after the June 30, 2008 approved assessment should have been conducted and approved no later than June 30, 2009. SERC staff contacted URE on March 4, 2010 regarding the self-certification and URE confirmed that the assessment had been performed and approved by the designated senior manager on June 30, 2008 and that no review or approval had taken place in 2009.

In response to SERC staff’s inquiry, URE filed a Self-Report on March 9, 2010 for violations of CIP-002-1 R2 and R4. The Self-Report stated that URE completed the risk-based assessment of its Critical Assets and such assessment was approved by the designated senior manager on June 30, 2008 and no Critical Assets or Critical Cyber Assets were identified as a result of this assessment. URE stated further that its risk-based methodology had not changed, the physical transmission system had not changed, nor had there been any changes to the distribution system that would affect URE’s transmission system since June 30, 2008. As such, URE stated that its understanding was that review and approval of a “null list” was not required annually.

As a result of its assessment, SERC staff found URE in violation of CIP-002-1 R2 and R4 because although URE had developed a null list of Critical Assets, the list had not been annually reviewed, updated and approved by senior management as required by the Standard.

⁷ URE confirmed during SERC’s compliance assessment that the date of its last assessment to identify critical assets was performed on June 30, 2008, not June 15, 2008 as listed on its August 7, 2009 self-certification.

RELIABILITY IMPACT STATEMENT- POTENTIAL AND ACTUAL

SERC finds that the violations did not pose a serious or substantial risk to the BPS, because URE had completed the risk-based assessment in June 2008, which resulted in an identified “null” set of Critical Assets. URE’s methodology had not changed nor had the system configuration changed, and any new risk assessment would have resulted in the same “null” list of Critical Assets as identified in the 2008 annual review approved by a senior manager on June 30, 2008.

IS THERE A SETTLEMENT AGREEMENT YES NO

WITH RESPECT TO THE VIOLATION(S), REGISTERED ENTITY

NEITHER ADMITS NOR DENIES IT (SETTLEMENT ONLY) YES
ADMITS TO IT YES
DOES NOT CONTEST IT (INCLUDING WITHIN 30 DAYS) YES

WITH RESPECT TO THE ASSESSED PENALTY OR SANCTION, REGISTERED ENTITY

ACCEPTS IT/ DOES NOT CONTEST IT YES

III. DISCOVERY INFORMATION

METHOD OF DISCOVERY

SELF-REPORT ⁸
SELF-CERTIFICATION
COMPLIANCE AUDIT
COMPLIANCE VIOLATION INVESTIGATION
SPOT CHECK
COMPLAINT
PERIODIC DATA SUBMITTAL
EXCEPTION REPORTING

⁸ As noted above, URE submitted a self-certification as “Compliant,” but indicated in such certification that the assessment of cyber assets had not been conducted since June 30, 2008. From its follow up discussion regarding URE’s self-certification, SERC suggested URE submit a self-report of the possible violation. While SERC recognizes the filing of the self-report, it did not give full credit for the self-report, as it was filed after the self-certification.

DURATION DATE(S)

January 1, 2010 to May 31, 2010, when URE completed its Mitigation Plan.

DATE DISCOVERED BY OR REPORTED TO REGIONAL ENTITY

February 2, 2010 self-certification and March 9, 2010 self-report

IS THE VIOLATION STILL OCCURRING

YES NO

IF YES, EXPLAIN

REMEDIAL ACTION DIRECTIVE ISSUED YES NO
PRE TO POST JUNE 18, 2007 VIOLATION YES NO

IV. MITIGATION INFORMATION

FOR FINAL ACCEPTED MITIGATION PLAN:

MITIGATION PLAN NO.	MIT-09-2561
DATE SUBMITTED TO REGIONAL ENTITY	March 24, 2010
DATE ACCEPTED BY REGIONAL ENTITY	June 8, 2010
DATE APPROVED BY NERC	July 1, 2010
DATE PROVIDED TO FERC	July 1, 2010

IDENTIFY AND EXPLAIN ALL PRIOR VERSIONS THAT WERE ACCEPTED OR REJECTED, IF APPLICABLE

None.

MITIGATION PLAN COMPLETED YES NO

EXPECTED COMPLETION DATE	Submitted as complete
EXTENSIONS GRANTED	None
ACTUAL COMPLETION DATE	May 31, 2010

DATE OF CERTIFICATION LETTER	July 26, 2010
CERTIFIED COMPLETE BY REGISTERED ENTITY AS OF	May 31, 2010

DATE OF VERIFICATION	July 30, 2010⁹
VERIFIED COMPLETE BY REGIONAL ENTITY AS OF	May 31, 2010

⁹ This Disposition Document serves as SERC's Verification of Mitigation Plan Completion.

**ACTIONS TAKEN TO MITIGATE THE ISSUE AND PREVENT
RECURRENCE**

To correct the violations of CIP-002-1, URE held a meeting on March 11, 2010 with appropriate Company representatives to review the current risk-based methodology for identifying Critical Assets. As a result of this meeting, a new "null list" of Critical Assets and Critical Cyber Assets was created. A Memorandum of Record was signed by Senior Management on March 11, 2010 approving the new "null list" of Critical Assets and Critical Cyber Assets. An electronic calendar containing due dates for all SERC-related filings, reviews, and approvals was created and maintained at the Senior Management level of the Company to ensure that all actions occur on a timely basis. The due dates for reviews and approvals will coincide with annual review requirements as dictated by the NERC Standard. The due dates for SERC-related filings, reviews, and approvals will be discussed at all semi-monthly staff Meetings.

**LIST OF EVIDENCE REVIEWED BY REGIONAL ENTITY TO EVALUATE
COMPLETION OF MITIGATION PLAN (FOR CASES IN WHICH
MITIGATION IS NOT YET COMPLETED, LIST EVIDENCE REVIEWED
FOR COMPLETED MILESTONES)**

- 1. a memorandum signed by URE's CEO on July 21, 2008 stating that URE does not have Critical Assets;**
- 2. a document from URE's cyber security consultant illustrating the results of the June 24, 2008 Critical Asset study for URE. This document contains the risk based methodology URE uses annually to evaluate its assets;**
- 3. a memo signed by URE's Chief Operating Officer stating that based on its annual review of its assets, URE has no Critical Assets or Critical Cyber Assets; and**
- 4. an e-mail from URE's executive assistant indicating that the scheduling calendar was completed. The e-mail included the calendar.**

V. PENALTY INFORMATION

TOTAL ASSESSED PENALTY OR SANCTION OF \$0 FOR TWO VIOLATIONS OF RELIABILITY STANDARDS.

(1) REGISTERED ENTITY'S COMPLIANCE HISTORY

PRIOR VIOLATIONS OF ANY OF THE INSTANT RELIABILITY STANDARD(S) OR REQUIREMENT(S) THEREUNDER IN THE SERC REGION

YES NO

LIST ANY CONFIRMED OR SETTLED VIOLATIONS AND STATUS

ADDITIONAL COMMENTS

PRIOR VIOLATIONS OF OTHER RELIABILITY STANDARD(S) OR REQUIREMENTS THEREUNDER IN THE SERC REGION

YES NO

LIST ANY PRIOR CONFIRMED OR SETTLED VIOLATIONS AND STATUS IN THE SERC REGION

ADDITIONAL COMMENTS

(2) THE DEGREE AND QUALITY OF COOPERATION BY THE REGISTERED ENTITY (IF THE RESPONSE TO FULL COOPERATION IS "NO," THE ABBREVIATED NOP FORM MAY NOT BE USED.)

FULL COOPERATION YES NO

IF NO, EXPLAIN

(3) THE PRESENCE AND QUALITY OF THE REGISTERED ENTITY'S COMPLIANCE PROGRAM

IS THERE A DOCUMENTED COMPLIANCE PROGRAM

YES NO

EXPLAIN

URE has an internal compliance program which SERC considered a mitigating factor in determining the penalty.

EXPLAIN SENIOR MANAGEMENT'S ROLE AND INVOLVEMENT WITH RESPECT TO THE REGISTERED ENTITY'S COMPLIANCE PROGRAM, INCLUDING WHETHER SENIOR MANAGEMENT TAKES ACTIONS THAT SUPPORT THE COMPLIANCE PROGRAM, SUCH AS TRAINING, COMPLIANCE AS A FACTOR IN EMPLOYEE EVALUATIONS, OR OTHERWISE.

(4) ANY ATTEMPT BY THE REGISTERED ENTITY TO CONCEAL THE VIOLATION(S) OR INFORMATION NEEDED TO REVIEW, EVALUATE OR INVESTIGATE THE VIOLATION.

YES NO

IF YES, EXPLAIN

(5) ANY EVIDENCE THE VIOLATION(S) WERE INTENTIONAL (IF THE RESPONSE IS "YES," THE ABBREVIATED NOP FORM MAY NOT BE USED.)

YES NO

IF YES, EXPLAIN

(6) ANY OTHER MITIGATING FACTORS FOR CONSIDERATION

YES NO

IF YES, EXPLAIN

(7) ANY OTHER AGGRAVATING FACTORS FOR CONSIDERATION

YES NO

IF YES, EXPLAIN

(8) ANY OTHER EXTENUATING CIRCUMSTANCES

YES NO
IF YES, EXPLAIN

EXHIBITS:

SOURCE DOCUMENT
Self-Report dated March 9, 2010

MITIGATION PLAN
Mitigation Plan submitted March 24, 2010

CERTIFICATION BY REGISTERED ENTITY
Certification of Mitigation Plan Completion dated July 26, 2010

VERIFICATION BY REGIONAL ENTITY
This Disposition Document serves as SERC's Verification of Mitigation Plan Completion

OTHER RELEVANT INFORMATION:

NOTICE OF ALLEGED VIOLATION AND PROPOSED PENALTY OR
SANCTION ISSUED
DATE: OR N/A

SETTLEMENT DISCUSSIONS COMMENCED
DATE: **June 8, 2010** OR N/A

NOTICE OF CONFIRMED VIOLATION ISSUED
DATE: OR N/A

SUPPLEMENTAL RECORD INFORMATION
DATE(S) OR N/A

REGISTERED ENTITY RESPONSE CONTESTED
FINDINGS PENALTY BOTH NO CONTEST

HEARING REQUESTED

YES NO

DATE

OUTCOME

APPEAL REQUESTED