

# NERC

NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Public Posting NERC Compliance Violation Statistics

### **Background**

Each month the NERC Board of Trustees Compliance Committee (BOTCC) is presented with Compliance violation statistics. These statistics provide the committee with information regarding new violations that were identified during the current month, as well as updates to previous violations that are making their way through the compliance process. The information presented at these meetings contains both confidential and non-confidential material.

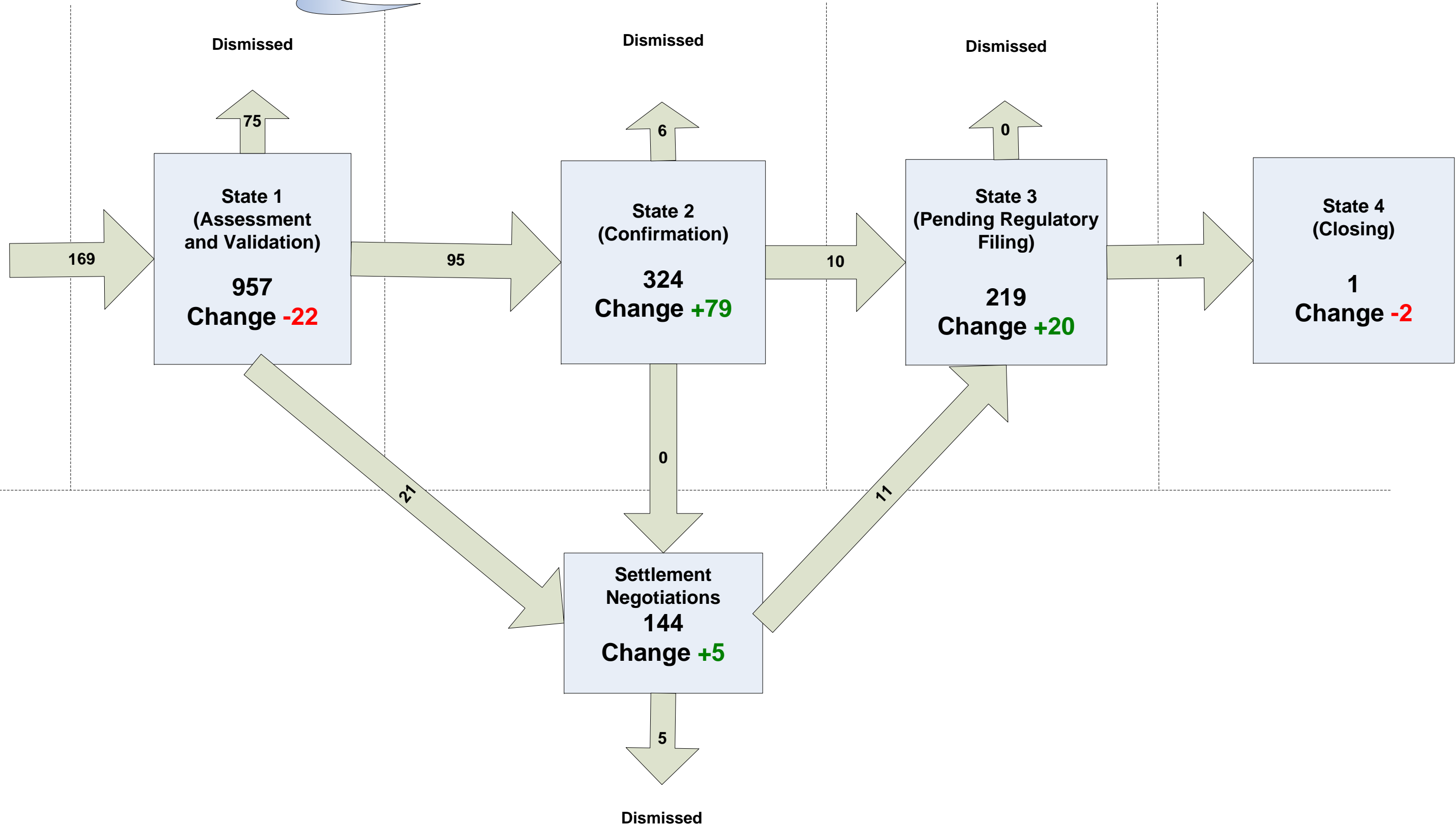
In May 2008, the BOTCC began to conduct open quarterly meetings. At these meetings, non-confidential compliance statistical information is presented to the committee and the public participants that attend. This information, as well as monthly non-confidential statistics, is now available and posted on this website in the form of violation and mitigation process state flow diagrams and supporting statistical tables.

### **Violation and Mitigation Process State Flow Diagrams**

NERC Compliance staff developed a set of process state flow diagrams to assist in monitoring the progress of violations and associated mitigation plans as they move through and follow the NERC Compliance Monitoring and Enforcement Program (CMEP). These diagrams show how many violations are in various 'states' and 'sub states' of the CMEP at the end of each month. These 'snapshot' values are denoted above the sub state name. The diagrams also show how many new violations were submitted into the process since the previous month (denoted on the extreme left of the flowchart); as well as the corresponding change in a sub state (denoted within the sub state box). Mitigation plan numbers are presented by individual violation mitigation plans. A definition for each sub state is included on the summary tables for information.

# Violation Process States

Snapshot comparison between September 26, 2008 and October 31, 2008



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

Below is a breakdown, as of October 31, 2008, of the Compliance Monitoring and Enforcement Program (CMEP) Violation Process Steps summarized by State for the 1749 FERC enforceable violations.

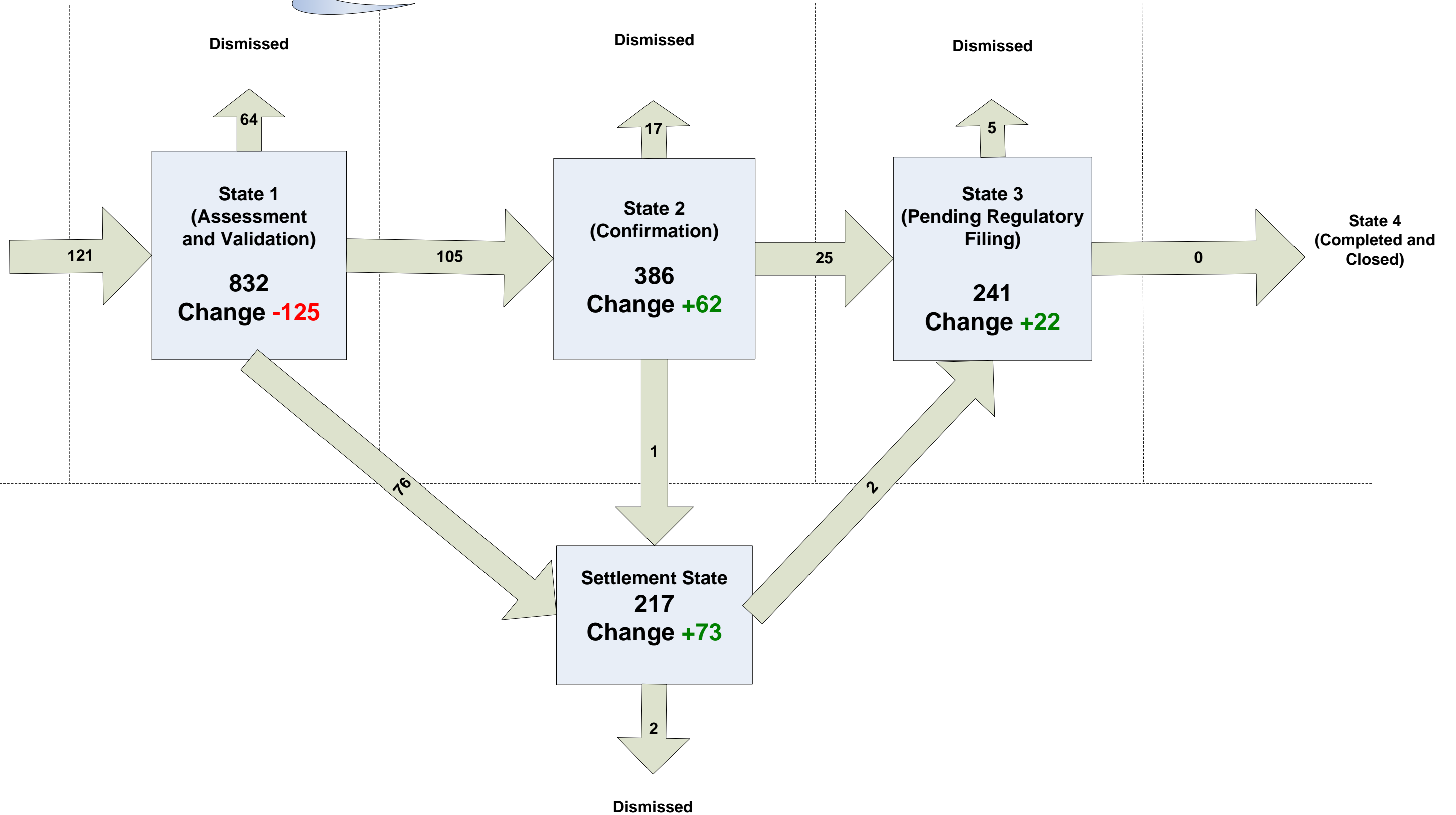
	STATE 1	STATE 2		STATE 3	STATE 4		
	Assessment and Validation	Confirmation	Settlement Negotiations	Pending Regulatory Filing	Completed and Closed (Previous 12 Months)		
Region						Total	% Closed to Total
FRCC	39	23	13	16	0	91	0%
MRO	11	6	0	30	7	54	13%
NPCC	3	4	16	1	12	36	33%
RFC	73	5	1	11	1	91	1%
SERC	86	1	13	37	70	207	33%
SPP	12	42	1	1	5	61	8%
TRE	14	0	14	20	10	58	17%
WECC	719	243	86	103	0	1151	0%
TOTAL	957	324	144	219	105	1749	6%

\* Includes new violations received through 10/31/2008.

Report Date: 11/3/2008

# Violation Process States

Snapshot comparison between October 31, 2008 and November 30, 2008



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

Below is a breakdown, as of November 30, 2008, of the Compliance Monitoring and Enforcement Program (CMEP) Violation Process Steps summarized by State for the 1781 FERC enforceable violations.

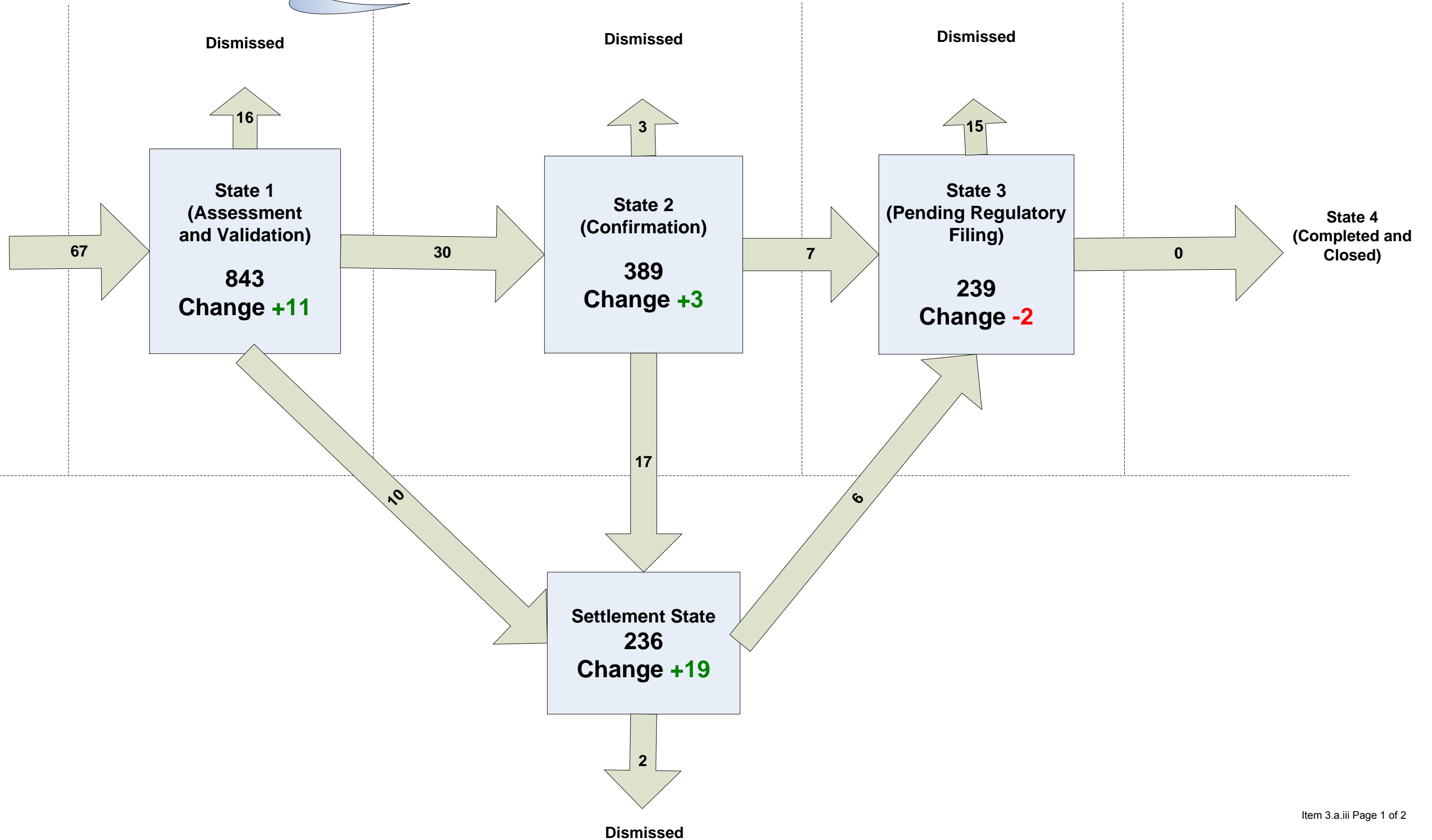
	STATE 1	STATE 2		STATE 3	STATE 4		
	Assessment and Validation	Confirmation	Settlement Negotiations	Pending Regulatory Filing	Completed and Closed (Previous 12 Months)		
Region						Total	% Closed to Total
FRCC	44	23	13	16	0	96	0%
MRO	12	6	0	30	7	55	13%
NPCC	12	6	16	1	12	47	26%
RFC	39	4	48	11	1	103	1%
SERC	64	1	40	39	70	214	33%
SPP	11	41	2	3	5	62	8%
TRE	19	0	14	20	10	63	16%
WECC	631	305	84	121	0	1141	0%
TOTAL	832	386	217	241	105	1781	6%

\* Includes new violations received through 11/30/2008.

Report Date: 1/5/2009

# Violation Process States

Snapshot comparison between November 30, 2008 and December 31, 2008



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

Below is a breakdown, as of December 31, 2008, of the Compliance Monitoring and Enforcement Program (CMEP) Violation Process Steps summarized by State for the 1812 FERC enforceable violations.

	STATE 1	STATE 2		STATE 3	STATE 4		
	Assessment and Validation	Confirmation	Settlement Negotiations	Pending Regulatory Filing	Completed and Closed (Previous 12 Months)		
Region						Total	% Closed to Total
FRCC	64	23	13	16	0	116	0%
MRO	9	3	3	33	7	55	13%
NPCC	7	0	26	5	12	50	24%
RFC	32	4	46	14	1	97	1%
SERC	73	1	40	39	70	223	31%
SPP	9	42	1	4	5	61	8%
TRE	20	0	13	22	10	65	15%
WECC	629	316	94	106	0	1145	0%
<b>TOTAL</b>	<b>843</b>	<b>389</b>	<b>236</b>	<b>239</b>	<b>105</b>	<b>1812</b>	<b>6%</b>

\* Includes new violations received through 12/31/2008.

Report Date: 1/5/2009

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

Below is a breakdown, as of December 31, 2008 of the Compliance Monitoring and Enforcement (CMEP) alleged violation summary for all 2385 violations.

	Dismissed	Previously Closed	Newly Closed	Total FERC Enforceable	% Non-Document Related	Total Canadian Violations	Total
FRCC	5	0	0	116	49%	0	121
MRO	14	7	0	48	46%	7	76
NPCC	8	12	0	38	50%	3	61
RFC	13	1	0	96	65%	0	110
SERC	29	70	0	153	93%	0	252
SPP	1	5	0	56	80%	0	62
TRE	3	10	0	55	82%	0	68
WECC	488	0	0	1145	51%	2	1635
<b>TOTAL</b>	<b>561</b>	<b>105</b>	<b>0</b>	<b>1707</b>	<b>57%</b>	<b>12</b>	<b>2385</b>

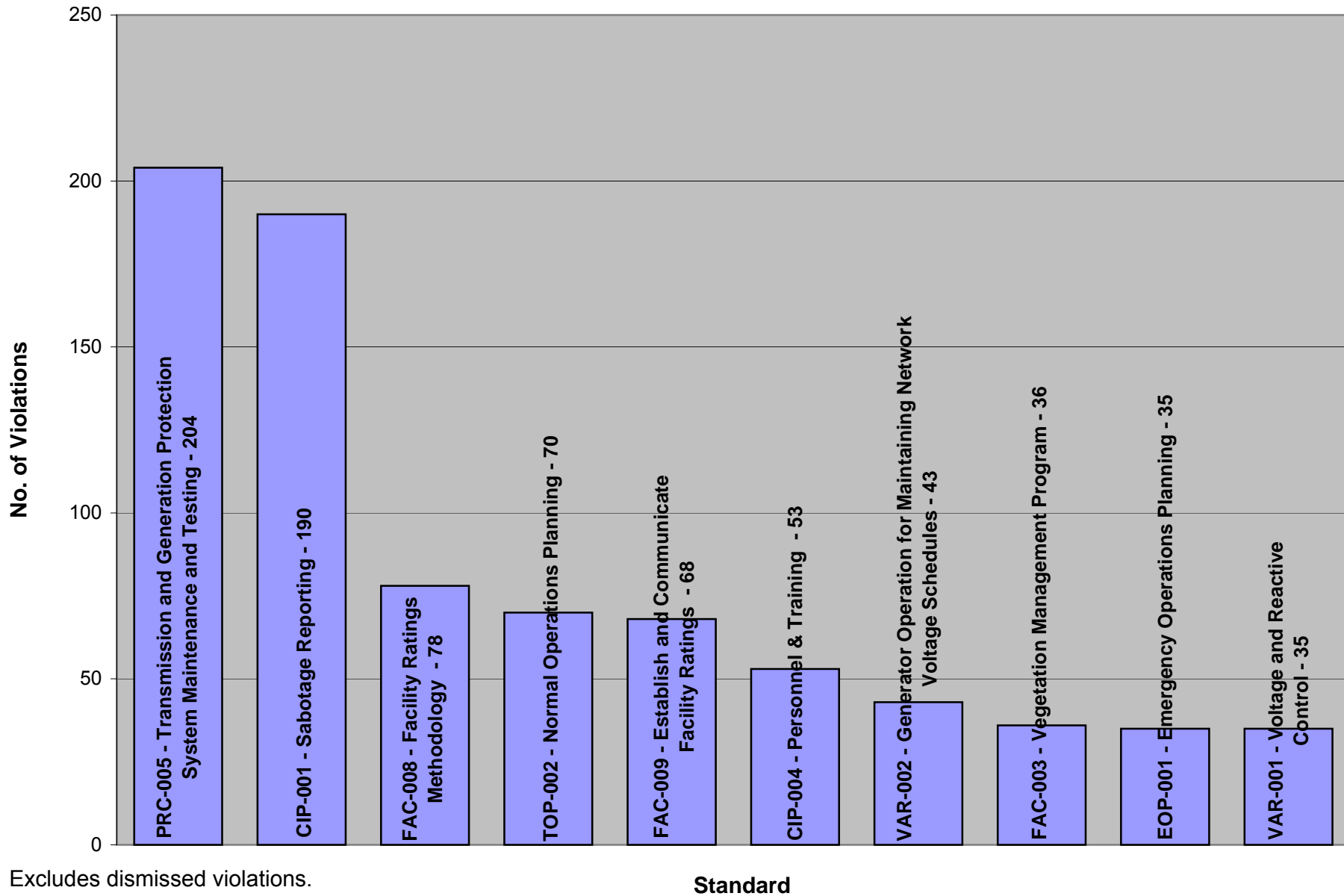
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Includes new violations received through 12/31/2008.

Report Date: 1/2/2009



## Top 10 FERC Enforceable Standards (Submit Dates: 1/1/2008 thru 12/31/2008)

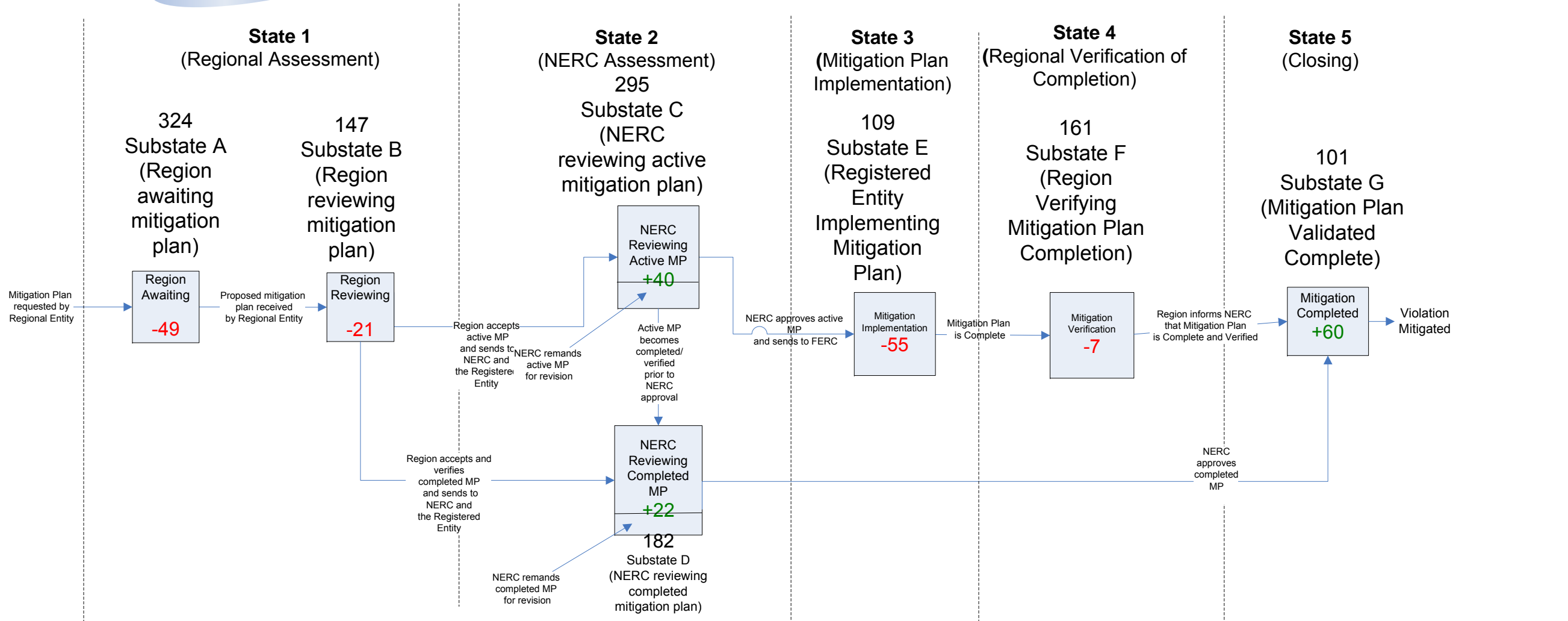


Excludes dismissed violations.

Report Date: 1/5/2009

# Mitigation Process States and Underlying Process Substates

Snapshot comparison between November 30, 2008 and December 31, 2008



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

Below is a breakdown, as of December 31, 2008, of the Compliance Monitoring and Enforcement Program (CMEP) Mitigation Plan “state” summary for the 1319 active violations.

	State 1		State 2			State 3	State 4	State 5	
	(Regional Assessment)		(NERC Assessment)			(Mitigation Plan Implementation)	(Regional Verification of Completion)	(Closing)	
	Substate A	Substate B	Substate C		Substate D	Substate E	Substate F	Substate G	
Region	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	Total
FRCC	28	8	5	4	7	0	19	7	78
MRO	6	0	0	3	1	0	2	1	13
NPCC	30	0	0	0	0	0	2	0	32
RFC	33	0	0	21	0	8	10	0	72
SERC	54	6	4	15	12	3	29	7	130
SPP	2	0	0	30	1	3	0	5	41
TRE	34	0	0	0	0	7	0	0	41
WECC	137	133	58	155	161	88	99	81	912
<b>TOTAL</b>	<b>324</b>	<b>147</b>	<b>67</b>	<b>228</b>	<b>182</b>	<b>109</b>	<b>161</b>	<b>101</b>	<b>1319</b>
<b>State Totals</b>	<b>471</b>	<b>477</b>	<b>109</b>	<b>161</b>	<b>101</b>				

- Includes Mitigation Plans received through 12/31/2008.
- Mitigation information reported at the violation level.

Report Date: 1/2/2009

### 2008 Progress with Pre-June 18th Violation Mitigation Plans

