

January 31, 2011

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

Re: NERC Administrative Citation Notice of Penalty FERC Docket No. NP11-__-000

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides the attached Administrative Citation Notice of Penalty¹ (Administrative Citation NOP) in Attachment A regarding 19 Registered Entities² listed therein,³ 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)).⁴

The Administrative Citation NOP resolves 41 violations⁵ of 11 Reliability Standards. In order to be a candidate for inclusion in this initial Administrative Citation NOP, the violations are those that had a minimal impact on the reliability of the bulk power system (BPS). In all cases, the violations contained in these NOP have been mitigated, certified by the respective Registered Entities as mitigated and verified by the Regional Entity as having been mitigated.

Some of the violations at issue in the Administrative Citation NOP are being filed with the Commission because the Regional Entities have respectively entered into agreements with the Registered Entities identified in Attachment A to resolve all outstanding issues arising from

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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 (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). See also Notice of No Further Review and Guidance Order, 132 FERC ¶ 61,182 (2010).

² Corresponding NERC Registry ID Numbers for each Registered Entity are identified in Attachment A.

³ Attachment A consists of three excel spreadsheets.

⁴ See 18 C.F.R § 39.7(c)(2).

⁵ 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.

preliminary and non-public assessments resulting in the Regional Entities' determination and findings of the enforceable violation of the Reliability Standards identified in Attachment A. In some of those settlement agreements, as designated in the attached spreadsheet, some of the Registered Entities have admitted to the violations, while the others have indicated that they neither admit nor deny the violations. While some of the Registered Entities have neither admitted nor denied the violations of the Reliability Standards, they have agreed to the proposed penalty stated in Attachment A, in addition to other remedies and mitigation actions to mitigate the instant violation and ensure future compliance with the Reliability Standards. Accordingly, all of the violations, identified as NERC Violation Tracking Identification Numbers in Attachment A, are being filed in accordance with the NERC Rules of Procedure and the CMEP.

As discussed below, this Administrative Citation NOP resolves 41 violations. The Commission has encouraged the use of a streamlined enforcement process that could avoid the filing of individual notices of penalty for violations that posed minimal risk to the reliability of the BPS.⁶ Completing these minimal risk violations will help NERC and the Regional Entities focus on the more serious violations of the mandatory and enforceable NERC Reliability Standards. NERC respectfully requests that the Commission accept this Administrative Citation NOP.

Statement of Findings Underlying the Alleged Violations

The descriptions of the violations and related risk assessments are set forth in Attachment A.

This filing contains the basis for approval by the NERC Board of Trustees Compliance Committee (NERC BOTCC) of the findings and penalties reflected in Attachment A. In accordance with Section 39.7 of the Commission's regulations, 18 C.F.R. § 39.7 (2010), each Reliability Standard at issue in this Notice of Penalty is set forth in Attachment A.

Text of the Reliability Standards at issue in the Administrative Citation NOP may be found on NERC's web site at <u>http://www.nerc.com/page.php?cid=2|20</u>. For each respective violation, the Reliability Standard Requirement at issue and the applicable Violation Risk Factor are set forth in Attachment A.

Status of Mitigation⁷

As noted above and reflected in Attachment A, the respective Regional Entities have determined that the violations identified in Attachment A have been mitigated. The mitigation activities have all been accepted by the Regional Entity and verified as completed. These activities are described in Attachment A for each respective violation. Information also is provided regarding the dates of Regional Entity verification of such completion.

⁶ See North American Electric Reliability Corporation, Reliability Standards Development and NERC and Regional Entity Enforcement, 132 FERC ¶ 61,217 at P 218 (2010) (encouraging streamlined "parking ticket"-type administrative processes aligned with the significance of the subject violations).

⁷ See 18 C.F.R § 39.7(d)(7).

Statement Describing the Proposed Penalty, Sanction or Enforcement Action Imposed⁸

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 Guidance Order, the October 26, 2009 Guidance Order and the August 27, 2010 Guidance Order,⁹ the NERC BOTCC reviewed the Administrative Citation NOP and the attachments thereto, on January 10, 2011. The NERC BOTCC approved the Administrative Citation Spreadsheet, including the Regional Entities' imposition of financial penalties as reflected in Attachment A, based upon its findings and determinations, the NERC BOTCC's review of the applicable requirements of the Commissionapproved Reliability Standards, and the underlying facts and circumstances of the violations at issue.

Pursuant to Order No. 693, 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 any specific penalty, upon final determination by FERC.

Request for Confidential Treatment of Certain Attachments

Certain portions of Attachment A include 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 to the Rules of Procedure. This includes non-public information related to certain Reliability Standard violations and confidential information regarding critical energy infrastructure.

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 information in the attached documents is 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 Notice of Penalty are the following documents and material:

- a) Administrative Citation Spreadsheet, included as Attachment A;
- b) Additions to the service list, included as Attachment B; and
- c) VRF Revision History Applicable to the Administrative Citation NOP, included as Attachment C.

⁸ See 18 C.F.R § 39.7(d)(4).

⁹ 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, 132 FERC ¶ 61,182 (2010).

A Form of Notice Suitable for Publication¹⁰

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

Notices and Communications

Notices and communications with respect to this filing may be addressed to the following as well as to the entities included in Attachment B to this Administrative Citation NOP:

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

Conclusion

Handling these violations in a streamlined process will help NERC and the Regional Entities focus on the more serious violations of the mandatory and enforceable NERC Reliability Standards. Accordingly, NERC respectfully requests that the Commission accept this Administrative Citation Notice of Penalty as compliant with its rules, regulations and orders.

Respectfully submitted,

Gerald W. Cauley President and Chief Executive Officer David N. Cook Senior 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 <u>/s/ Rebecca J. Michael</u> Rebecca J. Michael Assistant General Counsel V. Davis Smith Attorney North American Electric Reliability Corporation 1120 G Street, N.W. Suite 990 Washington, D.C. 20005-3801 (202) 393-3998 (202) 393-3955 – facsimile rebecca.michael@nerc.net davis.smith@nerc.net

cc: Entities listed in Attachment B



ATTACHMENT A

JANUARY 2011 ADMINISTRATIVE CITATION NOTICE OF PENALTY

CONSISTING OF

- 1. ATTACHMENT A-1: January 31, 2011 Public Administrative Citation Notice of Penalty Spreadsheet NON-CIP VIOLATIONS ONLY
- 2. ATTACHMENT A-2: January 31, 2011 Public Administrative Citation Notice of Penalty Spreadsheet PRIVILEGED AND CONFIDENTIAL INFORMATION REMOVED (CIP AND/OR NON-CIP)
- 3. ATTACHMENT A-3: January 31, 2011 Public Administrative Citation Notice of Penalty Spreadsheet CONTAINS PRIVILEGED AND CONFIDENTIAL INFORMATION – DO NOT RELEASE (CIP AND/OR NON-CIP)

ATTACHMENT B

REGIONAL ENTITY SERVICE LIST FOR JANUARY 2011 ADMINISTRATIVE CITATION NOTICE OF PENALTY

FOR MRO:

Daniel P. Skaar* President Midwest Reliability Organization 2774 Cleveland Avenue North Roseville, MN 55113 P: (651) 855-1731 dp.skaar@midwestreliability.org

Sara E. Patrick* Director of Regulatory Affairs and Enforcement Midwest Reliability Organization 2774 Cleveland Avenue North Roseville, MN 55113 P: (651) 855-1708 se.patrick@midwestreliability.org

FOR NPCC:

Walter Cintron* Manager, Compliance Enforcement Northeast Power Coordinating Council, Inc. 1040 Avenue of the Americas – 10th Floor New York, New York 10018-3703 (212) 840-1070 (212) 302-2782 – facsimile wcintron@npcc.org

FOR RFC:

Robert K. Wargo* Manager of Compliance Enforcement Reliability*First* Corporation 320 Springside Drive, Suite 300 Akron, OH 44333 (330) 456-2488 bob.wargo@rfirst.org L. Jason Blake* Attorney Reliability*First* Corporation 320 Springside Drive, Suite 300 Akron, OH 44333 (330) 456-2488 jason.blake@rfirst.org

FOR SERC:

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

Marisa A. Sifontes* General Counsel SERC Reliability Corporation 2815 Coliseum Centre Drive, Suite 500 Charlotte, NC 28217 (704) 494-7775 (704) 357-7914 – facsimile msifontes@serc1.org

Kenneth B. Keels, Jr.* Director of Compliance Andrea Koch* Manager, 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

FOR SPP RE:

Stacy Dochoda* General Manager Southwest Power Pool Regional Entity 16101 La Grande, Ste 103 Little Rock, AR 72223 (501) 688-1730 (501) 821-8726 – facsimile sdochoda@spp.org

Joe Gertsch* Manager of Enforcement Southwest Power Pool Regional Entity 16101 La Grande, Ste 103 Little Rock, AR 72223 (501) 688-1672 (501) 821-8726 – facsimile jgertsch@spp.org

Machelle Smith* Paralegal & SPP RE File Clerk Southwest Power Pool Regional Entity 16101 La Grande, Ste 103 Little Rock, AR 72223 (501) 688-1681 (501) 821-8726 – facsimile spp_regional_entity_file_clerk@spp.org

FOR TEXAS RE:

Susan Vincent* General Counsel Texas Reliability Entity, Inc. 805 Las Cimas Parkway Suite 200 Austin, TX 78746 (512) 583-4922 (512) 233-2233 – facsimile susan.vincent@texasre.org

Rashida Caraway* Manager, Compliance Enforcement Texas Reliability Entity, Inc. 805 Las Cimas Parkway Suite 200 Austin, TX 78746 (512) 583-4977 (512) 233-2233 – facsimile rashida.caraway@texasre.org

ATTACHMENT C

Violation Risk Factor Revision History Applicable to the Administrative Citation Notice of Penalty

Some of the Violation Risk Factors in the Administrative Citation spreadsheet can be attributed to the violation being assessed at a main requirement or sub-requirement level. Also, some of the Violation Risk Factors were assigned at the time of discovery. Over time, NERC has filed new Violation Risk Factors, which have been approved by FERC.

- When NERC filed Violation Risk Factors (VRF) it originally assigned CIP-003-1 R1 a Lower VRF. The Commission approved the VRF as filed; however, it directed NERC to submit modifications. NERC submitted the modified Medium VRF and on June 27, 2008, the Commission approved the modified Medium VRF. Therefore, the Lower VRF for CIP-003-1 R1 was in effect from June 18, 2007 until January 27, 2009 when the Medium VRF became effective. The subrequirements each have Lower VRFs.
- When NERC filed VRFs it originally assigned CIP-004-1 R2.1, R2.2 and R2.2.4 "Lower" VRFs. The Commission approved the VRFs as filed; however, it directed NERC to submit modifications. NERC submitted the modified "Medium" VRFs and on January 27, 2009, the Commission approved the modified "Medium" VRFs. Therefore, the "Lower" VRFs for CIP-004-1 R2.1, R2.2 and R2.2.4 were in effect from June 18, 2007 until January 27, 2009 when the "Medium" VRFs became effective. CIP-004-1 R2, R2.2.1, R2.2.2 and R2.3 have "Lower" VRFs.
- When NERC filed VRFs it originally assigned CIP-004-1 R3 a Lower VRF. The Commission approved the VRF as filed; however, it directed NERC to submit modifications. NERC submitted the modified Medium VRF and on January 27, 2009, the Commission approved the modified Medium VRF. Therefore, the Lower VRF for CIP-004-1 R3 was in effect from June 18, 2007 until January 27, 2009 when the Medium VRF became effective.
- When NERC filed VRFs it originally assigned CIP-004-1 R4.2 a Lower VRF. The Commission approved the VRF as filed; however, it directed NERC to submit modifications. NERC submitted the modified Medium VRF and on January 27, 2009, the Commission approved the modified Medium VRF. Therefore, the Lower VRF for CIP-004-1 R4.2 was in effect from June 18, 2007 until January 27, 2009 when the Medium VRF became effective. CIP-004-1 R4 and R4.1 have Lower VRFs.
- When NERC filed VRFs for FAC-008-1, NERC originally assigned Lower VRFs to FAC-008-1 R1.1, R1.2, R1.2.1 and R1.2.2. The Commission approved the VRFs but directed modifications. On December 19, 2007, NERC filed the modified Medium VRFs for FAC-008-1 R1.1, R1.2, R1.2.1 and R1.2.2 for

approval. On February 6, 2008, the Commission issued an Order approving the modified VRFs. Therefore, the Lower VRFs for FAC-008-1 R1.1, R1.2, R1.2.1 and R1.2.2 were in effect from June 18, 2007 until February 6, 2008 and the Medium VRFs has been in effect since February 6, 2008. FAC-008-1 R1, R1.3 and R1.3.5 have Lower VRFs and R1.3.1, R1.3.2, R1.3.3 and R1.3.4 have Medium VRFs.

ATTACHMENT D

UNITED STATES OF AMERICA FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation

Docket No. NP11-___-000

NOTICE OF FILING January 31, 2011

Take notice that on January 31, 2011, the North American Electric Reliability Corporation (NERC) filed an Administrative Citation Notice of Penalty regarding nineteen (19) Registered Entities in six (6) Regional Entity footprints.

Any person desiring to intervene or to protest this filing must file in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 CFR 385.211, 385.214). Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a notice of intervention or motion to intervene, as appropriate. Such notices, motions, or protests must be filed on or before the comment date. On or before the comment date, it is not necessary to serve motions to intervene or protests on persons other than the Applicant.

The Commission encourages electronic submission of protests and interventions in lieu of paper using the "eFiling" link at http://www.ferc.gov. Persons unable to file electronically should submit an original and 14 copies of the protest or intervention to the Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426.

This filing is accessible on-line at http://www.ferc.gov, using the "eLibrary" link and is available for review in the Commission's Public Reference Room in Washington, D.C. There is an "eSubscription" link on the web site that enables subscribers to receive email notification when a document is added to a subscribed docket(s). For assistance with any FERC Online service, please email FERCOnlineSupport@ferc.gov, or call (866) 208-3676 (toll free). For TTY, call (202) 502-8659.

Comment Date: [BLANK]

Kimberly D. Bose, Secretary

	Region	Registered Entity	NCR_ID	NERC Violation ID #	Description of the Violation	Reliability Re Standard	q. Violation Risk Factor	: Violation Seventy Leve	Rok Assessment	Violation Start Date	Violation End Date	Total Penalty or Sanction (\$)	Method of Discovery	Description of Miligation Attivity	Mitigation Completion Dat	Date Regional Entity Verified Completion of Mitigation	"Admits" or "Neither Admits nor Denies"
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	мяс				(CT) Tropping for presonnel having authorized oper or authorized interestined hybrid access to Clinical (Oper Authorized NRO) tater descrited the International Clinical Control Authorized Clinical Beneficial SCLAD Authorized as an authorized to control to control control and Clinical Clinical Clinical Clinical Clinical Clinical SCLAD verder presonantis, a requestion of the presentent R.2. IMCD, URE 21 alud to porcide any training records for the SCLAD verder presonantis, and equilibration of the proper access fail access as manufasted by Requirement R 4. IMCD, URE 21 alud taccess as manufasted by Requirement R 4. IMCD, URE 21 access as manufasted by Requirement R 4. IMCD, URE 21 access as manufasted by Requirement R 4. IMCD, URE 23 and Clinical to SCAD verder presented to a subset of the schedule to SCAD verder presented in the access fail.	R CIP-004-1 R4	Lower	Lower	In BUDDe study personal social of year adults terms that project in addition to BUDDe social and BUDDe social terms monthered by ARCU META white one is and Budge some terms charac- teria and the BUDDe social and Budge some terms charac- teria additional additional additional additional additional budge additional additional additional additional additional INIC documentaria that Rev Accelerate additional to the additional budge additional additional accelerated additional budge additional personal additional additional accelerated accelerated additional personal additional additional accelerated accelerated accelerated personal additional additional accelerated accelerated accelerated accelerated personal additional additional accelerated acce	7/1/2008	12/31/2009	\$0	Spot Check	Intellight and the standard in the second	lts hat 12/31/2009	12/10/2010	Admits
				NPCC201000131	In 2008, NPCC_URE1 implemented the annual cyber security training program as part of Ito CIP compliance plan. In 2009, as part of the programmers for the contraction of compliance to CIP-004. NPCC_URE1 conducted an internal review of the hardcory cyber accurate that the contraction of compliance to CIP-004. NPCC_URE1 conducted an internal review of the hardcory cyber accurate that the contraction of the compliance of the con- traction of the compliance of the compliance of the com- tent review. NPCC_URE1 was unable to provide widence that annu retaining hardbeam compliance to XI on the compliance of the com- tent review. NPCC_URE1 was unable to provide widence that annu- ted the compliance of the compliance of the compliance of the com- tent of the compliance of the compliance of the compliance of the com- tent of the compliance of the compliance of the compliance of the com- tent of the compliance of the compliance of the compliance of the com- tent of the compliance o		3 1 / 2 (High	NPCC determined that the alleged violation created a merimal risk to the initiality of the bid power system (PES) because the personal who had not bud the sequence of usering performed in the initiations required the second and the second system (PES) because the personal and Training', the pervisional resolution required the merganetic optimal amounts arrange ran centre to the second and as soon and PPCC_URES was assess that members of its part with as soon and PPCC_URES was assessed to the second and the personal second and the second second and the second and the second second second and the second and the second second second second second second and and the second	1/1/2010	4/30/2010	for NPCC201000132, NPCC201000135, NPCC201000133, NPCC201000136, NPCC201000131,	Self-report	Intro Unex, Tor the association involution is a solution of place to come any Unitial access. Intro Unex implementation is no UPCC UBIT 1. The association is unclusive and the solution of the solution access to COAL 2. Violation and place instructions of place and unecostopid place access to CCA have neared by treatment target a place access to COAL 2. Violation of the solution alteriated access of place access to CCA have neared by treatment target and the solution of the solution access of the solution of the access of the solution of the access of the solution of the access of the solution of the access of the solution of the access of the solution of the access of the solution of the access of the solution of the access of the solution of the access of the solution of the access of the solution of the access of the solution of the access of the solution of th	4/30/2010 us	12/20/2010	Neither Admits nor Denies
V V	лисс	NPCC_URE1	NCRXXXXX	NPCC201000132	Ine-evaluation of NPCC, URE1's program materials was conducted a result of recent industry compliance actions which lied to the identification of the following potential apps: 1. NPCC_URE1's existing raining methodology. 2 NPCC_URE1's revised raining methodology did not specifically clea the complete scope of element contained in Requirement 1.1.1, specifically relate stored to contained in Requirement 1.1.1, specifically relate stored to contained in Requirement 1.1.1, specifically relate stored to device devices and the store of the score of the store of the score of the store of the score of the score of the store of the score of the score of the store of the score of the score of the score of the score o	FAC-008-1 RT	Lower	Lower	of the bulk power system (PES) bocksex MPCC_URET is that an exerting healty intring methodology downers, the data of expendition, the second strategies and the expension of the second strategies and the second strategies and the second strategies and the second strategies and the second strategies relative to the second strategies and strategies and strategies and the second strategies and strategies a	6/21/2007	4/30/2010	NPCC201000133, NPCC201000126	Self-report		he 4/30/2010	12/20/2010	Neither Admits nor Denies
	NPCC		NCRXXXX	NPCC201000135	re-evaluation of NFCC_URET's popgarm materials was conducted as result of toxet's tabulary complexes actions which lieb to the second second second second second second second second relies of artiggs methodology did not specifically relies the complexe scope of elements contained in Regurement 1.1.1. specifically relies protective devices, and series and shurt compensating devices.	FAC-008-1 R1	Lower	Lower	of the bud power system (BFB) because white NFCC_URE1 had an satisfing antige marked-budg document, all door specifically due tellsy activity and the second budge document and the specifical system of the documents are used for developing fastility ratings and use such. NFCC_URE1 had convertaion in place to perform the task, but it needed allerations to incorporate all applicable equipment and poxide individual documentation for branchission facility rating methodology.	6/21/2007	4/30/2010	NPCC201000135, NPCC201000133, NPCC201000136, NPCC201000131, NPCC201000153	Self-report	The point of misconnection with the generation failblink 2. Revised entry transmission failblink and predication provem the tail anguater determins and unasses and the second and updater transmission failblink and the second and the second and the second transmission facilities using methodology.		12/20/2010	Neither Admits nor Denies
					Re-CL, Den Tody Tarl Galor Fraid Onlyado doubletad occurrences, specification in the generation Cales on a second control on the second sec	FAC-009-1 R1	Medium	Moderate	of the bulk power system (RPR) because NPCC_UREE I that eating implementations and an experimentation. Let the documents included to be the system of the system of the system of the system of the the documentation and an ended metastance in address and sease and part compensation devices for the generation and principal and part conductions and the system of the system of and part conductions and the system of and part readed attractions to nonprincipal applicable system at enterheaded applicable system of the system of the system of the documents of the system of the system of and the state of the system of and the state of the system of the system of and the state of the system of and the state of the system of the system of and the state of the system of and the state of the system of the system of and the state of	9'18/2009 6/21/2007	7/15/2010	for NPC201000132, NPC201000133, NPC201000133, NPC201000138, NPC201000131, NPC201000131, NPC201000153	Self-report	Memocology under PAC CDR5 for each NPCC_URET registered generating facility. 2 C detende and an antibated the design atting immunition for all affances appointed table in the component for the all common facility facility. The antibidities appointed to an antibidities of the component facility of the component for the all common facility facility. The all the component facility facility facility facility facility facility facility facility facility. E Approval and leader the Compared Facility Ratings book. 4 Conducted training to communities all procedual changes messarily to marian the Compared Facility Ratings book. 4 Conducted training to communities all procedual changes messarily to marian the Compared Facility Ratings book.			Neither Admits nor Denies
					NPCC_URE1 found that it did not have completed documentation for all its transmission loss and associated elements, specifically	r 14			Leditia and revised to include a simple methodology for generation. The documentation bus needed revision include suppresent scope, and shart compensation devision for the first sentences and peneration methodology document. There are occuments are used for developing taskly ratings and, as such, NPCC_URE1 had documentation in place to perform this task. It needed attaination to incorporate all applicable suppresent and provide includual bocomentation in assumement and provide includual bocomentation in the assumement and provide includual bocomentation in the assumement and provide includual bocomentation in the assumement and provide includual. These			NPCC201000133, NPCC201000135		Book and re-evaluated all facility ratings with the additional element information to determine the most limiting element. 4. Approved an re-instand the Transmission Excility Patient back 5. Conducted training to communicate all proceedural changes processary to maintain	i ho		
P P Description P Description P Description Descripion Description Descr	RPCC	NPCC_URE1		NPCC201000153	wa diatemaria fra 1 employee win unaconda physical acces and a second response of the second response of the second response also and the second response of the second response of the second response.	CIP-004-1 R3	Lower	Moderate	of the bulk power system (BPS) bockase the 3 employees with lapsed seven-year PRAs had been employed with NPCC_URE1 for multiple lyears, on a continuous basis, performing in their current capacity without incident and no disciplinary actions on file. Also, as soon as NPCC_URE1 personnel were asset of the tapse, COA access was immediately suspended until the negrind PRAs were completed. It should also be noted that the negrind PRAs were a semptions	1/1/2010	4/30/2010	for NPCC201000132, NPCC201000135, NPCC201000133, NPCC201000135	Self-report	In citical COLE 2. Revolute oper and physical second a antoxical accounts for the 3 employee whose PRAs has for the simulation of the second account of th	ss 4/30/2010 all	12/20/2010	Neither Admits nor Denies
P P VLIT KAXXXX PY200011 Section S	SPP	SPP_URE1	NCRXXXXX	SPP200900160	CIP-000-1. During an internal compliance assessment, SPP_URE1 document Link, which has based both observations of the univer- medicated that they have never trated the other baselum model indicated that they have never trated the other baselum model and whole media subtrates on other Critical Cyber Assets (CCAs) and did not have evidence of such tests. SPP_URE1 had the instances in which It failed to scoreduct a	CIP-004-1 R3	- Medium	Moderate	White SPP_URE1 taiked to test its backge media devices for some of its CCAs, SPP_URE1 was testing its EMS server backge devices.			\$600	Self-report for	The violation was magazed when SIPP_URE1 conducted PRAs for both employees on Oxidate 7, 2001. To help ensure Name	10/7/2009	5/13/2009	nor Denies Neither Admits nor Denies
PP PP-URE1 NCXXXXX PP20000116 Second as the TLAG As a base as of the submit of the submation of the submation of the submit of the submation of the submatio of the su					Intercent researcher physical access to a Chica Chiper Asse Could, The first instructions we discound any gain PLRETs to BPP EETs in an October 23, 2005 Bef Aspos, Basel Taka, The PLRET grant data membry we reached physical access to the despite name, a selegisment CCA, in Appart 28, 2005 bed form any and the second relations we addressing the second second accessing a first first informations in the second accession of the second relation access to the despite have non-plane that access the offent of the second relations we addressing a first first informations and derive the second relations we addressing and the second relations the despite first information of the second relation of the second relation and derive conduct the employee IPAA well Chicker 7, 2000, weld me any relation of the second relation of the second relation of the second relation of the second relation of the second relation of the second and derive conduct the employee IPAA well Chicker 7, 2000, weld me the second relation accession in the second relation of the second and second relation accession in the second relation of the second relation of the second relation of the second relation of the second relation of the second relation of the second and second relation accession in the second relation of the second relatio	n d			The time of the instanced violation, club, mergingwas hall waited for StepP-JURE 1 of tai waite intervery wait. The instances are used to an step of the step of the instance of the step of the s	Instance (Self Report); 9/9/2009 for the second instance	Instance; 10/7/2009 for the second instance		Spot Check for	is granting authorized cyber or authorized wesconnel physical access to CCAs.	71		
complant with CIP (06:4 R4 SPP LIREY's Cyber Security Policy procession the access point data and time of entry and with rame of individual accession the access point and name of annoisysee	509 -	SPP_URE1	NCRODOX	ISPP20080184	compared with CPP-003-1811 and RFL2. Respecting RFL1, WILENET 1C to Description / Pelosy Theory Theory Theory Berg 2014 and 2014 and 2014 and 2014 and 2014 and 2014 and 2014 previous addressing III annegacy sublations (CPP-003 1811, IV) en equand annal assessmith, advancementary on a preparentarial methods and annegacy sublations (CPP-003 181, IV) Cher Assets (CCA) if formation precision program (CPP-003 1 ATL) (II) the requirementarial assessmith and advances and information (CPP-014 and CPP-03 181, IV) (IV) and CPP-03 181, IV) process for controlling assess professes in protected information and (CPP-03 181, IV) (IV) and (CPP-03 181, IV) (IV) (IV) (IV) (IV) (IV) (IV) and (IV) (IV) (IV) (IV) (IV) (IV) (IV) (IV)	- (-118-003-1 47. e 11.2 e 12.2 x	Medum 9	Severe	boost a mirrimal risk to be instability of the buk power system (RPB), Regarding CIP-OS 1811, although SPP URET's Cyber Booxiny Polog failed to address all of the requirements of CIP-OS through CIP- committenet to inpresenting a possign and to compliance with the CIP- Bandrates, Regarding F1.2, the SCADA and Energy Management System (EMS) version regarding manufacture and limited and controled addresses to SPP LIFET's CCAA. Additionally, although the addresses as SPP LIFET's CCAA. Additionally, although the SPP LIFET LICEA. Instructure Tambian to second parameteria.	7/1/2008	2/18/2010	\$1,800	Spot Check	more specifically, CIP-003+1 R1.1; CIP-003+1 R4.3; CIP-003+1 R5.3; CIP-003+1 R5.12; CIP-004+1 R2.1; and CIP-004+1 R4.3 = R4.6; Regarding R1.2; SPP_LIRE1 revised its Cyber Security Policy to eliminate what it deemed to be highly sensitive information protected from disclosure under CIP-003+1 R4. SPP_LIRE1 then made the Policy readily available to its SCADA and EMS vendor support	93, 2718/2010	6772010	Nother Admis rot Danies
Online of Local Oper Analysis and in the CoCA (Chical Oper Analysis and in the Table Cock of the shift and Cock of the shif	509 -	SPP_URE1	NGRODOOX	SPP200300189	compared with CPP-06-114. SPP_UERE's typer decays hybridy consider that "(i) global with long at the access points all matters will apply in add at all Child at Access." SPP_UERE's matters and that spin hand out all Child at Access." SPP_UERE's matters and that spin hand out all Child at Access." SPP_UERE's matters and that spin hand out all Child at Access." SPP_UERE's matters and that spin hand out all Child at Access." SPP_UERE's matters physical access point of a spin share children of the physical physical access point of a spin share that the spin share that access point of a spin share that the share and spin spin access paint and application across physical heat the share that access physical based on the share and share an individual access physical access, physical access and the share that access and the share that access physical access physical heat the share that access the Spin Children access and the share that access and the share that access and the application access physical heat the share that access and the application access physical heat the spin share that access and the application access physical heat the share that access and the spin share access physical heat the spin share that access and the spin share that access and the spin share that access and the spin share that access and the spin share that access and the spin share that access and the spin share that access and the spin share that access and the spin share that access and t	CIP-006-1 R-4	Lower	High	based a minimal risk to the reliability of the buck power system (BPS). DPP_URE 1 do integrater a physical acounty program for manually logging entry to its physical acounty pointeness. The program uniquely documented and derifield in risking and captural the risk spin-time, the specific access paint to be entend, and provided for an escort for entry to any access paint within SPP_URE's physical acounty perimeter. The only deficiency identifield in the program was its failure to account of the prosteel time an individual entered a specific access point to the only deficiency identifield in the program was its failure to account of the prosteel time an individual entered a specific access point to	12/2/2009	1/15/2010	\$700	Spot Check	IPP LIKET (workaf its mawait togeng procedures to reque a tog at cash access poor write its physical cascing permission records the specific access point, date and time of entry and ext, name of individual accessing the access point, and name of employe encode	1/15/2010	6/4/2010	Nother Admits nor Denies





Region	Registered Entity	NCR_ID	NERC Violation ID #	Description of the Violation	Reliability Standard	Req.	Violation Risk Factor	Violation Severity Level	Risk Assessment	Violation Start Date	Violation End Date	Total Penalty or Sanction (\$)	Method of Discovery	Description of Mitigation Activity	Mitigation Completion Date	Date Regional Entity Verified Completion of Mitigation	"Admits" or "Neither Admits nor Denies"
\$PP	SPP_URE1	NCROOCOC	SPP200900192	Ching & Sach Chenk, SPF AE found SPF, URRY to lise in visionito Ching & Ki 2 and Ki 2 and Spraining NI 2 and State SPF. MRT 10 Response to a straining of the straining SPF. MRT 10 Response to an interface in a regarding CJ 2 mRT 10.11 2, the part of interface is in role and interface interface in the straining SPF. MRT 10 Response to a role of the SPF. MRT 10 and response to the contracted by SPF. URRT 16 dott calls by the regularement of the interface is interface interface interface interface interface interface interface models in contract, the straining label to include a singering read- ment of the straining and the straining sectors in the straining label to include a singering model is interface interface to an interface interface interface interface interface and the include regularized by an interface of the straining sectors interface interface that straining and analysis cleaner (ES BLC). State in index that add element of the regorders by the state in index that was determed to be regorders by the model in index that add element of the regorders by the state in index that add element of the regorders by the state index that the state determed to be regorders by the state index that the state determed to be regorders by the state in index that the state determed to be regorders by the state index that the state determed to be regorders by the state index that the state determed to be regorders by the state index that the state determed to be regorders by the state index that the state determed to be regorders by the state index that the state determed to be regorders by the state index that the state determed to be regorders by the state index that the state determed to be regorders by the state index that the state determed to be regorders by the state index that the state determed to be regorders by the state index that the state determed to be regorders by the state index that the state determed to be regorders by the state index that the state determed to be regord	CIP-008-1	R1 ((1.2. 1.6)	Lower		(JPP RE tax downnowi tex (JPP), LENT 11, volationa CC 124, 404, 414 volation CC 124, 414, 414, 414, 414, 414, 414, 414,	7/1/2008	2/19/2010	8000	Spot Check	(BP) USE! reveals in includer Reporting and Reporter Plant include include include tradeet fuelding and exercised tradeet (BP). USE! to exercise the second report of the relation includes include the second report of the relation includes include the second relation of the relation includes in the SE ISAC.	2/19/2010	6/2/2010	Neither Admits ror Denies
SPP	SPP_URE1		SPP200900194	During a Spot Check. SPP RE determined that SPP (UNET was non- complaree with COM- R2 because Halde to test its econvey plans by the required date of compliance (Jay 1, 2008).					SPF RET as downined that SPFU. URE't is volation of CIP-0001 FX pool an initial risk to be isolability of the bady over system (BPS). SPFU. URE't of time a recovery plan in place, even though it was not the system of the system of the system of the system of the Circlat Cyber Assets and can be reasonably expected in the septort of the Circlat Cyber Assets and can be reasonably expected to perform the appropriate recovery steps for a wide variety of indicets.		1/28/09	\$700	Spot Check		1/28/2009	5/7/2010	Neither Admits nor Denies
SPP	SPP_URE2	NCROOCOX	SPP200900182	Chinkwenker (#, 200), 3PF, URE2 statistical Saf Report for submitted in the statistical statistical statistical statistical and the statistical statistical statistical and the statistical statistical statistical and the statistical statistical statistical and the statistical and the statistical statistical and the statistical statistical the statistical statistical and the statistical and and and and and and and and	CIP-004-1	R4.1, I 4.2	Medium		GPP RE that advanced to GPP. Net the source of CPP 0.04 for the CPP of CPP 0.04 for CPP 0.04 for CPP 0.04 for CPP 0.04 for source of the CPP 0.04 for CPP 0.04 for CPP 0.04 for CPP 0.04 for work for the Setterial any employer that work for the Setter Immunity of CPP 0.04 for CPP		5/11/2010	50	Self-report	Rigadog RAT, 1977. UREZ se autorgo roviewo of ta acosta tanc to include ovalations of a cash reholdand to contra a contrauctores how cash acosts Response RAZ, a annuela price racia fugi ado provident week provide contra to include annuel to the how cash acosts Response RAZ, annuela price racia fugi ado provided week in advance of the deathre to allow adequate time to complete the costs checks of Rese required to complete the training.	S/11/2010	5/19/2010	Neither Admits nor Denies
MRO	MRO_URE3	NGRXXXXX	MP(0201000223	IRPO_LRES_supported that on August 24, 2019. S MPO_LRES INTERVISE distance does not a the Discross Court Pennister methylamic distance does not a the Discross Court Pennister methylamic distance does not be appennent to the court of the appennent methylamic distance does not be appennent to the court of the appennent methylamic distance does not appennent to the court of the distance does not appennent to the court of the appennent methylamic distance does not appennent to the court of the distance does not appennent to the court of the appennent distance appennent distance does not appennent to the distance court appennent appennent to appennent appennent appennent does not appennent to the distance does not appennent does not appennent to the distance appennent appennent appennent appennent to rever domain performant appennent appennent appennent appennent to rever domain performant appennent appennent appennent the Virabien Erer Calcetor Service was abueed to no be the Virabien Reverse Manager Service was disabled. The MPO_ performant appennen	CIP-007-2	R6	Lower		MHD backhold the solution posed a revenue rate to the addately of the logic oner grain backnowski and backhold bagged policity backhold bachhold bachhold backhold backhold backhold backhold b	when the operating system for the four domain servers was upgraded to Windows Server 2008, and the Windows Remote Manager Service was	1208/2010	80	Self-report	URE 0. LERS completed the following actions to mitigate the violation 1: To August 22, 2010 W WHRM ancies was an activated on at 4 to be down and contelles was in a characteristic of the faunt Collector and WHRM ancies was and a regarded advances in the second second secon	1282010	12102010	Admits

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	Attachment A-1
January 31, 2011	Public Administrative Citation Notice of Penalty Spreadsheet
	NON-CIP VIOLATIONS ONLY

Region	Registered Entity Minnkota Power	NCR_ID NCR01013	NERC Violation ID #	Description of the Violation MPC self-reported on October 13, 2010 that it did not have Description of the set of Description of CPUP. The self-	Reliability Standard MOD-006-0.	Req.	Violation Risk Factor Lower	Violation Severity Level Severe	Risk Assessment Violation Star Date MRO determined that this violation posed a minimal risk to the related by of the bulk news rustem (BPS) because MPC does not have any of the bulk news rustem (BPS) because MPC does not have any	Violation End Date 9/26/2010	Total Penalty or Sanction (\$) \$0	Method of Discovery Self-report	Description of Mitigation Activity UPC intigated this issue by polaring in CATT to include procedures for the use of CBM on September 28, 2010. The documentation UPC intigated this issue by spatiality is CATT to include procedures. The PATT can be load on MPC's well also by revisable to include the	Mitigation Completion Dati	Date Regional Entity Verified Completion of Mitigation 12/8/2010	"Admits" o "Neither Ar nor Denies Admits
	Cooperative (MPC)			production for the use of Capacity Render Margin (CBM). The well is a large Transmorphism (CRT) to its sense of the capacity of the computational sense of the capacity of the capacity of the computational production of the capacity of the computational production and law capacity and of the transmission (CMSI) excluding. The CNT III used to publicly part the cost of the capacity of the capacity capacity of the capacity of the capacity (CMSI) excluding the capacity of the capacity (CMSI) excluding the capacity capacity capacity in capacity (CMSI) excluding the capacity capacity capacity in capacity (CMSI) excluding the capacity capacity capacity in capacity (CMSI) exclude the capacity capacity capacity in capacity (CMSI) exclude the capacity capacity capacity in capacity (CMSI) exclude the capacity (CMSI) exclude the capacity (CMSI) exclude the capacity (CMSI) exclude the capacity (CMSI) exclude the capacity (CMSI) exclude the capacity (CMSI) e					of the Mu-houser sprinn (BFB) include MPC does not how any whom the control of the second se	when MPC updated is tariff to include procedures to the use of CBM	2		MPC's us of EMI anise band in Alabomer C of the doctraint. The CMT cashs loose on IMPC's we also by recepting to reginities intercessions, selecting Transmission Document and speng to "Open Access Transmission Test" Bocument			
MRO	Minrikota Power Cooperative (MPC)	NCR01013	MRO201000227	MPC self-reported on October 13, 2010 that it did not have procedures for the use of CBM and thus had no procedures posted a website. The servity, as a transmission provider, is required to create and post an OATT to a public website in order to comply with FERC Order BBX MDO/06 because effective on MBy 13, 2009, an	MOD-006-0.	1 R2	Lower	Severe	MRD determined that this violation posed a minimal risk to BPS 5/13/2009 reliability because MPC does not have any Network Customers under its when tartif, therefore there would be no request for COBM. Future have an complian- re changes needed to the ATC calculation because of CBM. Standard	10/04/2010 when MPC posted procedures fo the use of	\$0 r	Self-report	MPC mitigated the issue by posting is updated CMT to the MPC web site. The documentation of MPC's use of CBM can be found Academent C of that document. The GMT can be found on MPC's web alto by ranginging to the pulsawe minimized acom, selecting Threamstein Document' and opening the "Open Access Transmission Twelf" document.	n 10/4/2010	12/7/2010	Admits
MRO	Missonth Public Service Corporation (WPSC)	NCR00962	MR 0201000224	MPC postel is turff is relate procedure on the use of CBM on Docted 4, 3011. Scientific 4, 3013. WHIS's self-spontal a volation of VMH 002- 11.8, 821 Bocause if table to only a seasofiliated Tamemoion of the spontal VMM of the Science and the Science and page spotater (VMH) or the Watch 1 plant of Science and page spotater (VMM) or the Watch 1 plant of Science and the offer any absolute to this the set of science and spot science and the science and page spotater (VMM) or the Watch 1 plant of Science and the science and science and science and science and the science at 2019, and another restance begins on October 20, 2010 and lasted 34 seconds.		ia R3	Medium	Severe	manual manual (mathanian) (1920) (Webliker et al. ukm turneren e baseq catalacity and turit en an an anti-section of the section.	CBM on its website 10/20/2010	\$0	Self-report	Network List 1 (August 15, 2015 parent) And PTG operation queries of	e Lor e we	12/10/2010	Admits
MRO	Muscalina Power and Water (MPW)	NCR00967	MRQ201000195	During an on-site audit conducted April 5-15, 2010, MFW people of the separate manteneous and tearging secosits for the UFLB metal and the second s	I PRC-008-0	R2	Medium	Lower	SPC23cb and that have been a reason a mean that the matching for 2022/202 and the back power system (BHS) since MW were and optimizer and a when the mean optimizer of the second power and the second power and the mean optimizer of the second power and the second power and the mean optimizer of the second power and the second power and the mean optimizer of the second power and the second power and the second power optimizer of the second power and the mean optimizer of the second power and the second power power to the BPS.	9 4/20/2010 rst	\$0	Audit	The geolic gravity testing for these Station Batteries was completed on April 20, 2010, sang a manual hydrometer. MPW purchased new Dylai Hydrometer to replace the damaged unt on April 16, 2010.	a 4/20/2010	12/10/2010	Admits
MRO	Montana Dakota Utilities (MDU)	NCR01015	MRO201000203	During an on-site audit conducted July 19-23, 2010. MRO determine the MDD's Facility Ratings Methodology document wich was in book on from emiter audit petiod did not address series and shurt compensation devices. MDU mitigated the difficiency wills the audit may set on sits, and the same reviewed the new document wich new lacmitist at the rating methodology to be used for series and shurt onergineration devices.	1 FAC-008-0	R1	Lower	Severe	MRO datumined that this vicitation posed a minimal trial to the initiability 6/18/2007 of the bub power system (BPS) because this is a documentation issue. Additionally, MUD and so in the vary sites is comparation devices on its system, MUD has a shurt drives and provided evidence that the advice drives minips we provided is the Mudel SIO. Replan ont barring documented in MUD's Pacifity Ratings Methodology.	7/28/2010	\$0	Audit	Nortano Calcia mitgato the deficiency in to Facility Ratings Methodology while the MRO audions were on site. Series and shurt compensation devices were identified in version 6.0, dated July 28, 2010, of the Facility Rating Methodology document.	7/28/2010	7/29/2010	Admits
NPCC	Mt. Tom Generating Co., LLC (Mt. Tom)	NCR10050	NPCC201000166	During an internal Audit, It was determined the ML Tom did not have contact number for the FBI	a CIP-001-1	R4	Medium	Lower	NPCC determined that this violation posed a minimal risk to the reliability 8/23/2007 of the buk power system (BPS). Mr. Tom had been operating under its registration internal procedures on Sectrity, which specifically included requirements due for reporting suspected incidents of stability and the specific security and the redenal linear of investigation (FIM). This makesuremity obtained the contact information and updated its procedures.	5/7/2010	\$0	Self-report	NI. Ton established and documented its contact information with the PBI.	8/5/2010	11/17/2010	Neither J nor Deni
RFC	Buckeye Power, Inc.	NCR00700	RFC201000612	Buckeye Power self-reported that it was non-compliant with CIP-001 1, R4 for a period of approximately three months, between June 18, 2007 and September 21, 2007. Buckeye Power old not have a documented FBI contact during that period.	CIP-001-1	R4	Medium	Lower	The violation posed a minimal risk to the reliability of the bulk power system (RPS) because during the approximately three month period, Buckley Power minimaterial a documenter demangery response plan. The emergency response plan included an extensive cortact list, ruinding, but not limited to, a general RP cortact, as well as fine, poleo, and Hemeland Security cortact numbers, and applicable reporting procedures.	9/21/2007	\$0	Self-report	Budleye Power documented its specific FBI contact and the applicable reporting procedure on September 21, 2007.	9/21/07	9/27/07	Neither nor Der
SERC	East Mississippi Electric Power Association (EMEPA)	NCR01226	SERC201000520	EMEPA had a violation of CIP-001-1, R1 because it did not have procedures for the recognition of, and for making its operating personnel aware of, ababage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection, including at what stage in the process operating personnel are to be made aware of the event.	CIP-001-1	R1	Medium	Severe	SERC datemined that the violations posed a minimal risks the 6/19/2007 mitability of the budy power system (BPS) because: 1. EMEP had an Emergency Response Pain (ERP) in place since April 2005. Although the EPE of an of neet the spacefin engineement of CEP- 2007. J. Invoid base invoid agalance on how to respond during an 2. EMEPC Also and own or openature any BPS facilities;	9/28/2007	\$4,000 (Settlament of SERC201000520, SERC201000521, and SERC201000522)	Audit	EMEPA developed a Sabotage Reporting Procedure with the required elements and provided it to its operations personnel on Septem DI, 2007.	ber 9/28/07	9/17/10	Neither nor Der
01102 <u>0</u> 2	East Mississippi Electric Power Association (EMEPA)	8 <u>FE</u>		Exercise and a second of the second s	CIP-001-1	/ 31	/2C	111 Severe	1. The Vision Autoin ones trinst, because EMPA intigeted the constraints of generative and the second s	9/28/2007	\$4,000 (Settlament of SERC20100520, SERC20100521, and SERC201000522)	Audit	BAEPA geveloped a Sabotage Regioning Procedure with the regard elements and provided it to its operational personnel on Septem DIS, 2007.	ber 9/28/07	9/17/10	Neither nor De
SERC	East Mississippi Electric Power Association (EMEPA)	NCR01226	SERC201000522	EMEPA had a volation of CIP-V01-1 R3 bacause 1 did not have allottage reporce advances, the presented to contact, for advances provided to the validate event provided to bit operations protocold for the vettor enforceable particul.	CIP-001-1	R3	Medium	Severe	SERC datamented that the volations pools a minimal risk to the whathing of the skip pool registers (RPP) bocase. In 2014/Shi Mata and RPP and pools are ad-poil (Shi Manogin the EBP dat (EURAP) had an ERP pool normal equation (Shi Manogin the EBP dat palarose on how to respond and right are mergency situation (EURAP) how and one or operate any PPS calleder, The volume instantion of a service and EURAP, minipated the ALEMAP how and one of a service and EURAP, minipated the ALEMAP how and and approximately 200 MW.	9/28/2007	\$4,000 (Settlement of SERC201000520, SERC201000521, and SERC201000522)	Audit	BMEPA developed a Saloblage Reporting Procedure with the inspand elements and provided it to its operations personnel on Septem 28, 2007.	ber 9/28/07	9/17/10	Neithe nor De
SERC	French Broad Electric Membership Corporation (French Broad)	NCR01244	SERC201000496	SERC staff found "hench flexad to be in violation of CIP-0011, HT because it failed have procedures for the recognition of and for making its operating personnal aware of abotage events on its making its operating personnal aware of abotage events on the flexadown of the status and the flexadown of the transcorrection.	CIP-001-1	R1	Medium	Severe	SRC determine that the violation paced a minimal risk to the \$145000 studied of the \$195 beause: 1.1 This violation models a Function branch and statistical and 1.1 This violation models and the studied of the studi	3/11/2010	\$5,000 (Settlement of SERC201000496, SERC201000580, SERC201000581, and SERC201000582)	Audit	To construct weakanor CIP-00-11, R1, R2, R3, and R4, Pennth Board established and results of an expanse OF CP003, R1, R2, R3, and R4, Additorality, non-benefit 1, 2005, Prench Board CIP-001 procedure, so any tem training and proteining of an approximation of the state of the state and state of the state and state of the state of	tts 10/27/2010 (one mitigation plan addressed the violations of R1 4)	a 11/8/10 -	Admits
SERC	French Broad Electric Membership Corporation (French Broad)	NCR01244	SERC201000580	SERC staff found Prench Broad to be in violation of CIP-0011, R2 because I fields to have procedures for the communication of transcorrection.	CIP-001-1	R2	Medium	Severe	SERC determined that the volutions poond a minimal risk to the 4F182x07 statemined that the volutions poond a minimal risk to the First Board Area or an USE and First Board Area or agreement on transmission BPS assets. 2. As a RUS utility, Finand Broard hat a RUS approved ERP in place. The volution provided guidance on how to respond during an emergency state.	6/26/2009	\$5,000 (Settlement of SERC201000496, SERC201000580, SERC201000581, and SERC201000582)	Audit	To control the violation of CIP-001-1, R1, R2, R3 and R4, French Broad established and revised is procedures to meet the explanem of CIP-001, R1, R2, R3, and R4. Allocations, on the vinction 1. 2006. French Broad Heads IA If their employee with is addition to other provides to all French and employee and compared from those needed to identify and report suspected stability pro- production all French and employee and compared from those needed to identify and report suspected stability pro- production all French and employee and compared from those needed to identify and report suspected stability protecting the BPS and to prevent a recurrence of these violations.	tts 10/27/2010 (one mitigation plan addressed the violations of R1- 4)	» 11/8/10 -	Admits
SERC	French Broad Electric Membership Corporation (French Broad)	NCR01244	SERC201000581	SERC staff found Prench Broad to be in votation of CIP-001-1, R3 because If tailed to provide its operating personnel with sabotage response guidance, including personnel to contact. for reporting disturbances due to sabotage events.	CIP-001-1	R3	Medium	Severe	SERC determined that the vickations posed a minimal risk to the mixiability of the bub power system (BPS) because: 11. This vickation-involves Franch Broads majoritation as an LSE and 2. As a RUS utility, Franch Broad hata RUS approved BPP in place. Though this ERP for increment specific majoritation are implemented antibody this ERP for increments and CPO01-1, it would have provided guidance on how to respond during an emergency stration.	10/27/2010	\$5,000 (Settlement of SERC201000496, SERC201000580, SERC201000581, and SERC201000582)	Audit	To context the violation of CIP-001-1, R1, R2, R3 and R4, French Broad has established and revised its procedures to meet the regulariset of CIP-001-8, R2, R2, R3, and R4. Additionally, on November 1, 2003. French Braad Vised a full time employee who, in addition to other regrossibilities, advantamentary of Prench Braad CIP-000code, as used whether and proceedings and property of the state	10/27/2010 (one mitigation plan addressed the violations of R1 4)	a 11/8/10 -	Admit
SERC	French Broad Electric Membership Corporation (French Broad)	NCR01244	SERC201000582	SERC staff found Prench Broad to be in violation of CIP-0011, R4 because if ad not establish communications contacts, as applicable, with hoad FB Official and dworkp reporting procedures as appropriate to its circumstances.	CIP-001-1	R4	Medium	Severe	SRRC datemined that the violations posed a misimal risk to the misbably of the bub power system (BPS) because: and the bub power system (BPS) because: the system of the system of the system of the system fraction block has no systemation or the system on SPE and the Z. As a RUS stilly, Floridh Broad that a RUS approved BPF in place. Z. As a RUS stilly, Floridh Broad that a RUS approved BPF in place. The provided guidance on how to respond during an emergency tradeal.	9/26/2008	\$5,000 (Settlement of SERC201000496, SERC201000580, SERC201000581, and SERC201000582)	Audit	To consci the violation of CIP-001-1, R1, R2, R3 and R4, French Broad has exabilitied and network to procedures to meet the requirement of CIP-001-1, R1, R2, R3, and R4, Additionally, on Nevertise 11, 2007, French Broad hards a full fine employee with, the procedure, see produced to a Broad State determined and the second state of the Broad hards and the procedure, see produced to a Broad State determined and compared to a Broad hards and the events thereby protecting the BPS and to prevent a incurrence of these violations.	10/27/2010 (one mitigation plan addressed the violations of R1 4)	a 11/8/10 -	Admits
Texas R	E Champion Wind Farm, LLC	NCR10173	TRE200900074	In the course of a June 2009 Audit, no documented facility ratings methodology was provided for the period from registration through December 3, 2008.	FAC-008-1	R1	Lower	Severe	The violations posed a minimal risk to BPS milability because the Pacility Ratings established pursuant to FAC-009-1, R1 spanned the entries autodos pariod and were developed using a mathodology that included the required considerations and interfactor the Facility Ratings Methodology dated December 4, 2008.	12/3/2008	\$4,500 (Settlament of TRE200900074, TRE200900075, TRE200900076, TRE200900077, and TRE200900078)	Audit	E ON had a Facility Ratings Methodology in place as of December 4, 2008. The methodology provided by E DN dated December 4. 2008 activessed all of the requirements of the Relability Banclard.	12/4/2008	11/4/2010	Neithe nor De
Texas R	E Forest Creek Wind Farm, LLC	NCR04003	TRE200900075	In the course of a June 2009 Audit, no documented facility onlings methodology was provided for the period from registration through December 3, 2008.	FAC-008-1	R1	Lower	Severe	The violations poned a minimal risk to the exhability of the bulk power 6/20/2000 typetin (BPS) bocause the Facility Ratings established pursuant to FAC 000-1, RT separate the entire auxiliary particular to and were developed using a methodology at fault charded the negaried conditionations and reflexed the Facility Ratings Methodology dated December 4, 2008.	12/3/2008	\$4,500 (Settlement of TRE200900074, TRE200900075, TRE200900076, TRE200900077, and TRE200900078)	Audit	E ON taol is facility Barlings Nathrodology Institute at of Download 4, 2008. The methodology provided by E.ON dated Docember 4, 2008 addresses at of the requirements of the Relatedly Daveland.	12/4/2008	11/4/2010	Neithe nor De
Texas R	E EC&R Panther Creek Wind Farm I & II, LLC	NCR10249	TRE200900076	In the course of a June 2009 Audit, no documented facility ratings in the course of a June 2009 Audit, no documented facility ratings the course of a June 2009. December 3, 2008.	FAC-008-1	R1	Lower	Severe	The violations posed a minimal risk to the reliability of the bulk power 92/52/2008 mprotein (19/5) because the Facility Rainge established pursuant to FAC- methodology that included the required considerations and influenced the Facility Rainge Methodology dated December 4, 2008.	12/3/2008	\$4,500 (Settlement of TRE200900074, TRE200900075, TRE200900076, TRE200900077, and TRE200900077,	Audit	E ON had a Facility Ratings Bethodology in place as of December 4, 2008. The methodology provided by E DN datad December 4, 2008 addressed all of the requirements of the Relability Bandard.	12/4/2008	11/4/2010	Neither nor De
Texas R	E Roscoe Wind Farm, LLC	NCR10174	TRE200900077	In the course of a June 2009 Audit, no documented facility ratings methodology was provided for the period from registration through December 3, 2008.	FAC-008-1	R1	Lower	Severe	The violations posed a minimal rick to the reliability of the bulk power 2/2/9/2008 rystem (PPS) because the Fuelly Ratings established pursues to FAC- 2004-1. HT sparsed here in available point of and sime developed using a methodology that included the required considerations and reflected the Facility Ratings Methodology dated December 4, 2008.	12/3/2008	\$4,500 (Settlement of TRE200900074, TRE200900075, TRE200900076, TRE200900077, and TRE200900078)	Audit	E ON had a Facility Rulings Methodology in place as of December 4. 2008. The methodology provided by E ON dated December 4. 2008 actives and all of the requirements of the Reliability Banclard.	12/4/2008	11/4/2010	Neithe nor De
Texas R	E Sand Bluff Wind Farm, LLC	NCR04004	TRE200900078	In the course of a June 2009 Audit, no documented fladity ratings methodology was provided for the particle from registration through December 3, 2008.	FAC-008-1	R1	Lower	Severe	The violations posed a minimal risk to the relability of the bulk power protein (BPS) locause the Facility Ratings embedded prosent to FAC- tion (BPS) because the Facility Ratings embedded processor (BPAC) microbiology that included the required considerations and effected the Facility Ratings Methodology dated December 4, 2008.	12/3/2008	\$4,500 (Settlement of TRE200900074, TRE200900075, TRE200900076, TRE200900077, and TRE200900077, and	Audit	E ON had a Fucily Ratings Retholology in place as of December 4, 2008. The methodology provided by E DN dated December 4, 2008 activesed all of the requirements of the Relability Standard.	12/4/2008	11/4/2010	Neithe nor De
	E LCRA Transmission Services Corporation	NCR04091	TRE201000108	One UPLS reaby was tested outside the 60-month interval. UPLS reaby on Gonzalas Planet 14 had been inadventerly tested when the planet was tested on June 24, 2004, was scheduled be tested or October 7, 2006, but was due for testing on June 24, 2009. The test was performed on June 14, 2010.	PRC-006-0	R2	Medium	Lower	The violation posed a minimal risk to the reliability of the bulk power (#242/000 pythin (1895). The peak dynamic on the affected relay is approximately power (1895). The peak dynamic on the affected relay is approximately been 111% had the relay failed, baking them well above the ERCOT minimum equatement of VIC. In addition, when the subject relay was tested, it was found to be within tolerance.	6/14/2010	\$0	Self-report	Importantly upon recognizing that the subject relay equired feating. LCRA TSC conducted testing of the selay on June 14, 2010 to use proper operation. LCRA, TSC updated in LCRA. Statistics Operations (LCRA TSC conducted testing of the selay on the fact also in the target operation. LCRA related in LCRA. Statistics Operations (LCRA TSC conducted test. If this information does not correspondent contact the applicable LCRA Relatedly Coordinator or their supervisor."	a d,	11/15/2010	Admits
Texas R	E Tex-La Electric Cooperative of Texas, Inc.	NCR03142	TRE200900084	Take La Bencie da fort have a complex program i territyrigh ter UL angement. Exilia of dar have a schedule for the substrate for the materiaanova of the webpe. A bank schedule form leaded is grouper i dentification processing and the schedule of the schedule form territoria profile of the Photosean Territa & Bencie Carl Angement Bencie profile of the Photosean Territa & Bencie Carl Angement profile of the Photosean Territa & Bencie Carl Angement and Transp. Territa & Bencie Carl Angement of the East Tears Bencie Rescit: Them emmethyte have compared and the schedule of the schedule and the schedule of the schedule and the schedule schedule and the schedule of the schedule and schedule of the schedule and the schedule of the schedule and schedule of the schedule and schedule of the schedule and schedule of the schedule and schedule of the schedule and schedule of the schedule of the schedule and schedule of the Schedule and the schedule of the schedule and schedule of the Schedule and the schedule of the schedule and schedule of the Schedule and the schedule of the schedule and the schedule and the schedule of the schedule of the schedule and schedule of the Schedule and the schedule and the schedule of the schedule and schedule of the Schedule and the schedule and the schedule of the schedule and schedule of the Schedule and the schedule and the schedule of the schedule and the schedule and the schedule and the schedule of the schedule and the schedule and the schedule and the schedule and the schedule of the schedule and the sc	n	D R1	Medium	Severe	The solution paced a memory data the setablity of the Like power 14/02/00 hypertin (FFS) bacaces there were bits report powiced frait abmonstrated that the relays had been trained in 2008 even hough the [EF] supported features and a character are of counserted the superior distribution and a character are of counserted the power provided a matteration and testing schedule. According to here style, these and relatively removed from its procedure in bateleon file good-check and the audit.	7 4/30/2009	\$3,000	Audit	Ter La notified la Piday, Guides, and Proxides la incorporte a whence to Ter La TEE FOO IFE doo (trimely a bank fom ETEC s previous procedure). The document includes the information required by the Standard.	in 2/23/2010	6/25/2010	Neither

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