

October 31, 2011

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

**Re: NERC FFT Informational Filing
FERC Docket No. RC12-__-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides the attached Find Fix and Track Report¹ (FFT) in Attachment A regarding 33 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

This FFT resolves 82 possible violations⁵ of 25 Reliability Standards that posed a lesser risk (minimal to moderate) to the reliability of the bulk power system (BPS). In all cases, the possible violations contained in this FFT have been found and fixed, so they are now described as "remediated issues." A statement of completion of the mitigation activities has been submitted by the respective Registered Entities.

As discussed below, this FFT includes 82 remediated issues. These FFT remediated issues are being submitted for informational purposes only. The Commission has encouraged the use of streamlined

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 (2011). *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 is an Excel spreadsheet.

⁴ See 18 C.F.R. § 39.7(c)(2).

⁵ For purposes of this document, each matter is described as a "possible violation," regardless of its procedural posture.

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enforcement processes for occurrences that posed lesser risk to the BPS.⁶ Resolution of these lesser risk possible violations in this reporting format is appropriate disposition of these matters, and will help NERC and the Regional Entities focus on the more serious violations of the mandatory and enforceable NERC Reliability Standards.

Statement of Findings Underlying the FFT

The descriptions of the remediated issues 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 reflected in Attachment A. In accordance with Section 39.7 of the Commission's regulations, 18 C.F.R. § 39.7 (2011), each Reliability Standard at issue in this FFT is identified in Attachment A.

Text of the Reliability Standards at issue in the FFT may be found on NERC's web site at <http://www.nerc.com/page.php?cid=2|20>. For each respective remediated issue, the Reliability Standard Requirement at issue is listed in Attachment A.

Status of Mitigation⁷

As noted above and reflected in Attachment A, the possible violations identified in Attachment A have been mitigated. The respective Registered Entity has submitted a statement of completion of the mitigation activities to the Regional Entity. These mitigation activities are subject to verification by the Regional Entity via an audit, spot check, random sampling, a request for information, or otherwise. These activities are described in Attachment A for each respective possible violation.

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

⁷ See 18 C.F.R § 39.7(d)(7).

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Statement Describing the Resolution⁸

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 remediated issues included in this FFT on September 19, 2011. The NERC BOTCC approved the FFT based upon its findings and determinations, the NERC BOTCC's review of the applicable requirements of the Commission-approved Reliability Standards, and the underlying facts and circumstances of the remediated issues.

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 possible 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.

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).

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Attachments to be included as Part of this FFT Informational Filing

The attachments to be included as part of this FFT Informational Filing are the following documents and material:

- a) Find Fix and Track Report Spreadsheet, included as Attachment A; and
- b) Additions to the service list, included as Attachment B.

A Form of Notice Suitable for Publication¹⁰

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

¹⁰ See 18 C.F.R § 39.7(d)(6).

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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 FFT:

<p>Gerald W. Cauley President and Chief Executive Officer 3353 Peachtree Road NE Suite 600, North Tower Atlanta, GA 30326-1001 David N. Cook* Senior Vice President and General Counsel North American Electric Reliability Corporation 1120 G Street N.W., Suite 990 Washington, D.C. 20005-3801 david.cook@nerc.net</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. <i>See also</i> Attachment B for additions to the service list.</p>	<p>Rebecca J. Michael* Associate General Counsel for Regulatory and Corporate Matters 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</p>
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Conclusion

Handling these remediated issues in a streamlined process will help NERC, the Regional Entities, Registered Entities, and the Commission focus on improving reliability and holding Registered Entities accountable for the more serious violations of the mandatory and enforceable NERC Reliability Standards. Accordingly, NERC respectfully submits this FFT as an informational filing.

Respectfully submitted,

/s/ Rebecca J. Michael

Rebecca J. Michael
Associate General Counsel for Corporate
and Regulatory Matters
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

Gerald W. Cauley
President and Chief Executive Officer
3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326-1001
David N. Cook
Senior Vice President and General Counsel
North American Electric Reliability
Corporation
1120 G Street N.W., Suite 990
Washington, D.C. 20005-3801
david.cook@nerc.net

cc: Entities listed in Attachment B

Attachment a

**Fix and Track Report Spreadsheet
(Included in a Separate Document)**

Attachment b

Additions to the service list

ATTACHMENT B

**REGIONAL ENTITY SERVICE LIST FOR OCTOBER 2011 FIND FIX AND TRACK
REPORT (FFT) INFORMATIONAL FILING**

FOR FRCC:

Sarah Rogers*
President and Chief Executive officer
Florida Reliability Coordinating Council, Inc.
1408 N. Westshore Blvd., Suite 1002
Tampa, Florida 33607-4512
(813) 289-5644
(813) 289-5646 – facsimile
srogers@frcc.com

Linda Campbell*
VP and Executive Director Standards & Compliance
Florida Reliability Coordinating Council, Inc.
1408 N. Westshore Blvd., Suite 1002
Tampa, Florida 33607-4512
(813) 289-5644
(813) 289-5646 – facsimile
lcampbell@frcc.com

Barry Pagel*
Director of Compliance
Florida Reliability Coordinating Council, Inc.
3000 Bayport Drive, Suite 690
Tampa, Florida 33607-8402
(813) 207-7968
(813) 289-5648 – facsimile
bpagel@frcc.com

FOR MRO:

Daniel P. Skaar*
President
Midwest Reliability Organization
2774 Cleveland Avenue North
Roseville, MN 55113
(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
(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

Edward A. Schwerdt*
President and Chief Executive Officer
Northeast Power Coordinating Council, Inc.
1040 Avenue of the Americas, 10th Floor
New York, NY 10018-3703
(212) 840-1070
(212) 302-2782 – facsimile
eschwerdt@npcc.org

Stanley E. Kopman*
Assistant Vice President of Compliance
Northeast Power Coordinating Council, Inc.
1040 Avenue of the Americas, 10th Floor
New York, NY 10018-3703
(212) 840-1070
(212) 302-2782 – facsimile
skopman@npcc.org

FOR RFC:

Robert K. Wargo*
Director of Enforcement and Regulatory Affairs
Reliability*First* Corporation
320 Springside Drive, Suite 300
Akron, OH 44333
(330) 456-2488
bob.wargo@rfirst.org

L. Jason Blake*
Corporate Counsel
Reliability*First* Corporation
320 Springside Drive, Suite 300
Akron, OH 44333
(330) 456-2488
jason.blake@rfirst.org

Megan E. Gambrel*
Associate Attorney
Reliability*First* Corporation
320 Springside Drive, Suite 300
Akron, OH 44333
(330) 456-2488
megan.gambrel@rfirst.org

Michael D. Austin*
Associate Attorney
Reliability*First* Corporation
320 Springside Drive, Suite 300
Akron, OH 44333
(330) 456-2488
mike.austin@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
Maggie Sallah*
Legal Counsel
SERC Reliability Corporation
2815 Coliseum Centre Drive, Suite 500
Charlotte, NC 28217
(704) 494-7775
(704) 357-7914 – facsimile
msifontes@serc1.org
msallah@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.re@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.re@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
spprefileclerk@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

FOR WECC:

Mark Maher*
Chief Executive Officer
Western Electricity Coordinating Council
155 North 400 West, Suite 200
Salt Lake City, UT 84103
(360) 713-9598
(801) 582-3918 – facsimile
Mark@wecc.biz

Constance White*
Vice President of Compliance
Western Electricity Coordinating Council
155 North 400 West, Suite 200
Salt Lake City, UT 84103
(801) 883-6855
(801) 883-6894 – facsimile
CWhite@wecc.biz

Sandy Mooy*
Associate General Counsel
Western Electricity Coordinating Council
155 North 400 West, Suite 200
Salt Lake City, UT 84103
(801) 819-7658
(801) 883-6894 – facsimile
SMooy@wecc.biz

Christopher Luras*
Manager of Compliance Enforcement
Western Electricity Coordinating Council
155 North 400 West, Suite 200
Salt Lake City, UT 84103
(801) 883-6887
(801) 883-6894 – facsimile
CLuras@wecc.biz

Attachment c

Notice of Filing

ATTACHMENT C

UNITED STATES OF AMERICA FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation

Docket No. RC14-____-000

NOTICE OF FILING October 31, 2011

Take notice that on October 31, 2011, the North American Electric Reliability Corporation (NERC) filed a FFT Informational Filing regarding thirty-three (33) Registered Entities in eight (8) 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