

**Attachment A-1
October 31, 2011 Public Spreadsheet Notice of Penalty Spreadsheet
(NON-CIP Violations)**

Region	Registered Entity	NCR_ID	NERC Violation ID #	Notice of Confirmed Violation or Settlement Agreement	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" "Neither Admits nor Denies" "Agrees and Stipulates to the Facts" or "Does Not Contest"	Factors Affecting the Penalty and Other Considerations
Florida Reliability Coordinating Council (FRCC)	Progress Energy Florida (PEF)	NCR00063	FRCC201000344	Settlement Agreement	PEF submitted a Self-Report to FRCC on March 17, 2010, and revised on April 8, 2010, reporting a violation of PRC-001-1 R3/3.2. PEF, as a Transmission Operator (TOP), did not coordinate changes to the protection systems with three neighboring Balancing Authorities (BAs) and TOPs in two instances. PEF had conducted an internal review to confirm documentation of protection system coordination on all interconnection lines and found two instances where changes to the protection systems were not coordinated with neighboring BAs and TOPs. The first change occurred October 9, 2008 when new settings were issued on the North Bartow to Pebbledale line. The second change occurred on December 2, 2008 when new settings were issued on the Barberville to Barberville line.	PRC-001-1	R3; R3.2	High	Severe	This violation posed a minimal and not serious or substantial risk to the reliability of the bulk power system (BPS) because there were no changes to the settings values of the newly installed relays compared to the settings of the prior relays. In addition the interconnected entity did not have to make any changes in response to the installation of the new relays.	10/9/08 (date of new relay installation)	12/22/10 (Mitigation Plan completion)	\$75,000 (for FRCC201000344, FRCC201000345, FRCC201000353, and FRCC201000357)	Self-Report	PEF completed and approved a procedure that documents the process for coordinating system protection and relay settings with neighboring utilities and Generator Operators. A report was developed listing all interconnections, setting changes and documentation of coordination. PEF communicated its interconnection relay settings to interconnected utilities and validated the coordination of all the interconnection relay settings. After confirming setting with interconnected utilities, PEF performed protection coordination studies to validate the settings and notified interconnected utilities of the results.	12/22/2010	3/24/2011	Neither Admits nor Denies	PEF had a compliance program at the time of the violation which FRCC considered a neutral factor.
Florida Reliability Coordinating Council (FRCC)	Progress Energy Florida (PEF)	NCR00063	FRCC201000345	Settlement Agreement	PEF submitted a Self-Report to FRCC on March 17, 2010, and revised on April 8, 2010, reporting a violation of PRC-001-1 R4. PEF, as a Transmission Operator (TOP), could not provide evidence that PEF had coordinated its protective system with interconnected neighboring Generator Operators (GOPS), Balancing Authorities (BAs), and Transmission Operators (TOPs) in 17 instances. PEF stated that it believed that the coordination of the relays was performed, but documentation to prove coordination was not retrievable or did not exist. PEF had conducted an internal review to confirm documentation of protection system coordination on all interconnection lines and PEF kept a spreadsheet of all coordinations. PEF stated that it believed that the coordination of the relays was performed based on its usual business practice, but documentation to prove coordination was not retrievable or did not exist.	PRC-001-1	R4	High	High	This violation posed a minimal and not serious or substantial risk to the reliability of the BPS because the PEF states that PEF's practice is to coordinate its settings. It is PEF's regular practice to coordinate settings and PEF believes the settings were coordinated in the 17 instances, but was unable to produce evidence to demonstrate that those 17 instances had been coordinated.	9/13/07 (date of first change made without evidence of coordination)	12/22/10 (Mitigation Plan completion)	\$75,000 (for FRCC201000344, FRCC201000345, FRCC201000353, and FRCC201000357)	Self-Report	PEF completed and approved a procedure that documents the process for coordinating system protection and relay settings with neighboring utilities and GOPs. A report was developed listing all interconnections, setting changes and documentation of coordination. PEF communicated its interconnection relay settings to interconnected utilities and validated the coordination of all the interconnection relay settings. After confirming settings with interconnected utilities, PEF performed protection coordination studies to validate the settings and notified interconnected utilities of the results.	12/22/2010	3/24/2011	Neither Admits nor Denies	PEF had a compliance program at the time of the violation which FRCC considered a neutral factor.
Florida Reliability Coordinating Council (FRCC)	Progress Energy Florida (PEF)	NCR00063	FRCC201000353	Settlement Agreement	PEF submitted a Self-Report to FRCC on March 17, 2010, and revised on April 8, 2010, reporting a violation of FAC-001-1 R2. PEF, as a Transmission Owner (TO), did not include eight of the 16 sub-requirements of FAC-001-1 R2 in its facility connection document. During the months of February and March of 2010, PEF performed an internal review of FAC-001 compliance and found that its facility connection document did not include two of the 2 facility connection sub-requirement elements for end-user interconnection and transmission interconnection. Upon further investigation, PEF found a lack of documentation for a total of eight of the 16 sub-requirements of FAC-001-1 R2. The eight sub-requirements that PEF self-reported are: R2.1.3, R2.1.4, R2.1.5, R2.1.7, R2.1.8, R2.1.11, R2.1.12, and R2.1.15.	FAC-001-0	R2	Medium	Moderate	This violation posed a minimal and not serious or substantial risk to the reliability of the BPS because all applicable sub-requirements would have been discussed and negotiated during the engineering studies related to the interconnection. In addition only seven interconnections were made during the duration of the violation and those interconnections do not impact the BPS for purposes of this Standard.	6/18/07 (when the Standard became mandatory and enforceable)	10/14/10 (Mitigation Plan completion)	\$75,000 (for FRCC201000344, FRCC201000345, FRCC201000353, and FRCC201000357)	Self-Report	PEF assessed its compliance with FAC-001, completed a revised facility connections requirements document, reviewed and assigned the document internally and posted the document publicly.	10/14/2010	11/23/2010	Neither Admits nor Denies	PEF had a compliance program at the time of the violation which FRCC considered a neutral factor.
Florida Reliability Coordinating Council (FRCC)	Progress Energy Florida (PEF)	NCR00063	FRCC201000357	Settlement Agreement	FRCC discovered a violation of VAR-002-1 R3.1 during an April 23, 2010 Compliance Audit. An Automatic Voltage Regulator (AVR) event occurred on December 11, 2007. PEF, as a GOP, failed to communicate to its TOP the expected duration after a change in status for one of its generator reactive power resources. An AVR event occurred on December 11, 2007 at approximately 06:51 EST at Hines Energy Power Block-1B (Hines PB1B). According to the Hines PB1B operation logs, the AVR rejected to manual at 06:51 EST but did not indicate the duration was communicated to the Energy Control Center (ECC) operator. The ECC alarm screen recorded the AVR mode change at 06:51 EST indicating the TOP was aware the AVR rejected to manual but the ECC log did not indicate the duration was communicated. The logs indicated the duration was communicated at 10:07 EST. The GOP failed to communicate to its TOP the expected duration after a change in status for one of its generator Reactive Power resources.	VAR-002-1	R3; R3.1	Medium	Lower	This violation posed a minimal and not serious or substantial risk to the reliability of the BPS because the TOP was aware the AVR was unavailable and would have directed the GOP to adjust manually and the GOP was already instructed to maintain voltage schedules as previously provided.	12/11/07 at 06:51 (when the AVR rejected to manual)	12/11/07 10:07 (when logs indicate the duration was communicated)	\$75,000 (for FRCC201000344, FRCC201000345, FRCC201000353, and FRCC201000357)	Compliance Audit	On September 23, 2010, PEF conducted a diagnostic/evaluation process focused on identifying improvement opportunities, in order to mitigate opportunities for additional reportable incidents. The Progress Energy Power Operations Group issued an order that reiterated the requirements in VAR-002 as well as the logging, documentation and data retention period requirements. A PlantView Tool was funded, developed, tested and implemented from January to October 2011. The implementation of the new PlantView based reporting tool will allow Plant and ECC operators to communicate an AVR or MVAR status or capability change and duration via a common platform. Once the Plant operator has entered the requisite AVR/MVAR information, the ECC operator receives a notification at the TOP control console that prompts the ECC operator to acknowledge receipt of the event. Requiring all fields to be completed prior to advancing the log to the next step (i.e. initiate, acknowledge, closure) will ensure all of the VAR-002 requirements have been fulfilled for compliance.	10/31/2011 (Approved Date)	TBD	Neither Admits nor Denies	PEF had a compliance program at the time of the violation which FRCC considered a neutral factor.

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ReliabilityFirst Corporation (ReliabilityFirst)	City of Dover	NCR00713	RFC201000426	Settlement Agreement	From June 14, 2010 through June 28, 2010, ReliabilityFirst conducted a Compliance Audit of City of Dover. During the Audit, ReliabilityFirst discovered a violation of PRC-005-1 R1. As a Distribution Provider (DP) that owns a transmission Protection System, City of Dover failed to include maintenance and testing intervals for its 60 station batteries and its four voltage and current sensing devices. In addition, City of Dover failed to include a basis for all maintenance and testing intervals as well as summaries of maintenance and testing procedures for its four voltage and current sensing devices. This violation involved all of City of Dover's 69 transmission Protection System devices. As a Generator Owner (GO) that owns a generation Protection System, City of Dover failed to include maintenance and testing intervals for its 20 station batteries, 17 direct current control circuits and 17 voltage and current sensing devices. In addition, City of Dover failed to include a basis for all maintenance and testing intervals as well as summaries of maintenance and testing procedures for its 20 station batteries and its 17 voltage and	PRC-005-1	R1	High	Severe	ReliabilityFirst determined that, due to the facts and circumstances, this violation posed a moderate risk to the reliability of the bulk power system (BPS). City of Dover experienced a Misoperation at the Cartanza substation on November 25, 2008. City of Dover identified, corrected and submitted the information to ReliabilityFirst. The risk to the BPS was mitigated by the following factors: 1) the Cartanza substation has redundant and backup protection, and any alarm alert the operator of the control room, which is staffed 24 hours a day; 2) City of Dover monitors the Protection Systems and visually inspected such Protection Systems during the period notwithstanding the absence of a formal plan for maintenance and testing and scheduled intervals; 3) Unit 11, City of Dover's one generating unit with blackstart capability, has triple redundant protection, and when the Protection System operates alarms sound and personnel respond immediately; and 4) City of Dover surveys and inspects Unit 11 at least once daily.	6/18/2007 (mandatory effective date of the Standard)	9/1/2010 (date City of Dover implemented its revised program)	\$18,000 (for RFC201000426, RFC201000427, RFC201000616, and RFC201000617)	Compliance Audit	For its DP function, City of Dover developed a program that defines the intervals and basis for all maintenance and testing and includes summaries of the maintenance and testing procedures. For its GO function, City of Dover developed a revised program which defines maintenance and testing intervals and their basis for all Protection System devices.	8/30/2010 (for DP function) 3/31/2011 (for GO function)	10/26/2010 (for DP function) 4/20/2011 (for GO function)	Admits	ReliabilityFirst considered certain aspects of City of Dover's compliance program as mitigating factors. Individuals working in administration, line crews, and engineering and operations individually complete workshops and training. In addition, City of Dover compliance officers have direct contact with the City Manager. City of Dover's Reliable Public Power Provider panel reviews the city's plans and indices biennially, and City of Dover reviews them yearly. City of Dover's Reliable Public Power Provider application is reviewed bi-annually, and City of Dover reviews all plans and indices yearly.
ReliabilityFirst Corporation (ReliabilityFirst)	City of Dover	NCR00713	RFC201000427	Settlement Agreement	From June 14, 2010 through June 28, 2010, ReliabilityFirst conducted a Compliance Audit of City of Dover. During the Audit, ReliabilityFirst discovered a violation of PRC-005-1 R2. As a Distribution Provider (DP) that owns a transmission Protection System, City of Dover failed to provide evidence that it maintained and tested its station batteries and voltage and current sensing devices within the defined intervals. In addition, City of Dover failed to provide the date it last maintained and tested its voltage and current sensing devices. This violation involved City of Dover's single transmission station battery bank, which includes 60 batteries and all of its four transmission voltage and current sensing devices, which constitute 64 of City of Dover's 69 total transmission Protection System devices. As a Generator Owner (GO) that owns a generation Protection System, City of Dover failed to provide evidence that it maintained and tested its station batteries, direct current control circuitry and voltage and current sensing devices. In addition, City of Dover failed to provide the date it last maintained and tested its station	PRC-005-1	R2	Lower	Severe	ReliabilityFirst determined that, due to the facts and circumstances, this violation posed a moderate risk to the reliability of the bulk power system (BPS). City of Dover experienced a Misoperation at the Cartanza substation on November 25, 2008. City of Dover identified, corrected and submitted the information to ReliabilityFirst. The risk to the BPS was mitigated by the following factors: 1) The Cartanza substation has redundant and backup protection, and any alarm alert the operator of the control room, which is staffed 24 hours a day; 2) all voltage and current sensing devices passed tests during installation in 2004, and City of Dover continually tested its station batteries despite failing to include intervals in its maintenance and testing program until 2009; 3) SCADA alarms monitor the direct current control circuitry and the station batteries; and 4) City of Dover found no issues with the voltage and current sensing devices and station batteries when it next tested those devices. In addition, City of Dover surveys and inspects Unit 11, City of Dover's one generating unit with black	6/18/2007 (mandatory effective date of the Standard)	8/30/2010 (for DP function, date City of Dover completed all testing) 3/31/2011 (for GO function, date City of Dover completed all testing due to need to coordinate outages with PJM Interconnection, LLC)	\$18,000 (for RFC201000426, RFC201000427, RFC201000616, and RFC201000617)	Compliance Audit	For its DP function, City of Dover conducted required maintenance and testing on all station batteries and voltage and current sensing devices pursuant to its revised Protection System maintenance and testing program. For its GO function, City of Dover conducted all required testing on all direct current control circuitry and voltage and current sensing devices pursuant to its revised Protection System maintenance and testing program.	8/30/2010 (for DP function) 3/31/2011 (for GO function)	10/26/2010 (for DP function) 4/20/2011 (for GO function)	Admits	ReliabilityFirst considered certain aspects of City of Dover's compliance program as mitigating factors. Individuals working in administration, line crews, and engineering and operations individually complete workshops and training. In addition, City of Dover compliance officers have direct contact with the City Manager. City of Dover's Reliable Public Power Provider panel reviews the city's plans and indices biennially, and City of Dover reviews them yearly. City of Dover's Reliable Public Power Provider application is reviewed bi-annually, and City of Dover reviews all plans and indices yearly.
ReliabilityFirst Corporation (ReliabilityFirst)	City of Dover	NCR00713	RFC201000616	Settlement Agreement	From June 14, 2010 through June 28, 2010, ReliabilityFirst conducted a Compliance Audit of City of Dover. During the Audit, ReliabilityFirst discovered a violation of FAC-008-1 R1. City of Dover, as a Generator Owner, failed to include terminal equipment in the scope of equipment addressed in its Facility Ratings Methodology. In addition, City of Dover's Facility Ratings Methodology failed to include a Ratings Methodology for relay protective devices and instead included its relay settings in its Facility Ratings Methodology; however, relay settings are not a Facility Rating.	FAC-008-1	R1	Medium	Moderate	ReliabilityFirst determined that, due to the facts and circumstances, this violation posed a moderate risk to the reliability of the bulk power system (BPS). The risk to the reliability of the BPS was mitigated by the following factors: 1) the most limiting element of City of Dover's Facility is the turbine generator, and this did not change when City of Dover added the missing terminal equipment; 2) City of Dover has not derated any generation facilities, and the Rating for the terminal equipment is well above the most limiting element; and 3) the Rating for Unit 11, City of Dover's one generating unit with blackstart capability, is accurate, as demonstrated by its performance as part of the PJM Interconnection, LLC's Summer and Winter Capacity Demonstration Programs.	6/18/2007 (mandatory effective date of the Standard)	8/30/2010 (the date City of Dover completed its mitigation plan)	\$18,000 (for RFC201000426, RFC201000427, RFC201000616, and RFC201000617)	Compliance Audit	City of Dover revised its Facility Ratings Methodology to include terminal equipment and a correct rating for its relay protective devices.	8/30/2010	11/22/2010	Admits	ReliabilityFirst considered certain aspects of City of Dover's compliance program as mitigating factors. Individuals working in administration, line crews, and engineering and operations individually complete workshops and training. In addition, City of Dover compliance officers have direct contact with the City Manager. City of Dover's Reliable Public Power Provider panel reviews the city's plans and indices biennially, and City of Dover reviews them yearly. City of Dover's Reliable Public Power Provider application is reviewed bi-annually, and City of Dover reviews all plans and indices yearly.
ReliabilityFirst Corporation (ReliabilityFirst)	City of Dover	NCR00713	RFC201000617	Settlement Agreement	From June 14, 2010 through June 28, 2010, ReliabilityFirst conducted a Compliance Audit of City of Dover. During the Audit, ReliabilityFirst discovered a violation of the FAC-009-1 R1. ReliabilityFirst reviewed City of Dover's Facility Ratings, as they were included in its Reliability Compliance Manual, which includes the Facility Ratings for the McKee Run and VanSant generating stations. City of Dover, as a Generator Owner, failed to include Ratings for transmission conductors and failed to include Emergency Ratings for its transmission conductors for the McKee Run and VanSant generating stations, consistent with the associated Facility Ratings Methodology.	FAC-009-1	R1	Medium	High	ReliabilityFirst determined that, due to the facts and circumstances, this violation posed a moderate risk to the reliability of the bulk power system (BPS). The risk to the reliability of the BPS was mitigated by the following factors: 1) the most limiting element of City of Dover's Facility is the turbine generator, and this did not change when City of Dover added the missing terminal equipment; 2) City of Dover has not derated any generation facilities; 3) the Rating for Unit 11, City of Dover's one generating unit with blackstart capability, is accurate, as demonstrated by its performance as part of the PJM Interconnection, LLC's Summer and Winter Capacity Demonstration Programs.	6/18/2007 (mandatory effective date of the Standard)	8/30/2010 (the date City of Dover completed its mitigation plan)	\$18,000 (for RFC201000426, RFC201000427, RFC201000616, and RFC201000617)	Compliance Audit	City of Dover revised its plant procedures and supporting documents to include transmission conductors and Emergency Ratings for transmission conductors in its Facility Ratings.	8/30/2010	11/22/2010	Admits	ReliabilityFirst considered certain aspects of City of Dover's compliance program as mitigating factors. Individuals working in administration, line crews, and engineering and operations individually complete workshops and training. In addition, City of Dover compliance officers have direct contact with the City Manager. City of Dover's Reliable Public Power Provider panel reviews the city's plans and indices biennially, and City of Dover reviews them yearly. City of Dover's Reliable Public Power Provider application is reviewed bi-annually, and City of Dover reviews all plans and indices yearly.

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ReliabilityFirst Corporation (ReliabilityFirst)	Duke Energy Corporation (Duke)	NCR00761	RFC201000665	Settlement Agreement	On October 28, 2010, Duke submitted a Self-Report indicating that Duke, as a Transmission Owner that owns a transmission Protection System, failed to produce evidence that 20 of its Protection System devices were maintained and tested with the defined intervals. Duke provided additional information via an amended Self-Report submitted on January 21, 2011. In these Self-Reports, Duke disclosed that it had failed to test 20 relays at its Wheatland combustion turbine peaking facility within the five-year interval specified in its Protection System maintenance and testing program. Duke purchased this facility in 2000 and, upon this transition, failed to identify and include these relays in its Protection System maintenance and testing program. Duke's Protection System maintenance and testing program includes approximately 9,100 relays. This violation involved approximately 0.2% of these relays.	PRC-005-1	R2.1	High	Lower	Based on the nature of the violation, and offset by the mitigating factors described below, ReliabilityFirst determined that this violation posed a moderate risk to the reliability of the bulk power system. This risk posed by this violation was mitigated by the following factors: 1) Duke received documentation from the previous owner of the Wheatland facility showing that the relays were tested in 2003 and found to be in good working condition and within tolerance; 2) upon performing testing in 2010, Duke found the relays to be in good working condition and within tolerance; 3) Duke experienced no misoperations or system events regarding these relays; and 4) all of the relays at issue are protected by a back-up protection system and a majority of the relays at issue are further protected by a redundant Protection System.	10/7/2009 (the date Duke missed the interval defined in its Protection System maintenance and testing program)	10/28/2010 (the date that Duke completed testing on the 20 relays)	\$14,000	Self-Report	Duke completed testing on these 20 relays. To prevent recurrence of this violation, Duke ensured that the 20 relays were included in the tracking documentation used in conjunction with its Protection System maintenance and testing program. In addition, a review of the relays identified in the transmission and generation Protection System maintenance and testing program was conducted to ensure all required relays were included in the program at the Wheatland generating station as well as two other Duke purchased generation facilities. This analysis was completed on October 31, 2010.	10/28/2010	8/23/2011	Admits	ReliabilityFirst considered certain aspects of Duke's compliance program as mitigating factors. Duke has a compliance administration program that is responsible for compliance with the Reliability Standards. The compliance administration program reports to the vice president of compliance and integration, who has independent access to the CEO. The compliance program is integrated and widely distributed throughout the company. ReliabilityFirst also considered an affiliate of Duke's, Duke Energy Carolinas, prior violation of PRC-005-1 R2 (NOC-378). ReliabilityFirst determined that the instant violation constituted a repetitive infraction and, accordingly, considered Duke's violation history as an aggravating factor.
ReliabilityFirst Corporation (ReliabilityFirst)	Fowler Ridge Wind Farm LLC (Fowler Ridge)	NCR10307	RFC201100757	Settlement Agreement	Fowler Ridge submitted a self report on February 18, 2011 regarding a violation of FAC-009-1 R1. Fowler Ridge, as a Generator Owner (GO), failed to include its Generation Interconnection Line in its Facility Ratings. Prior to NERC's October 7, 2010 Recommendation to Industry entitled "Consideration of Actual Field Conditions in Determination of Facility Ratings," Fowler Ridge was not aware that it needed to include Facility Ratings for the Generation Interconnection Line. During due diligence performed in preparation to respond to the Recommendation, AE Power, the company that manages Fowler Ridge's compliance program, discovered the issue. Fowler Ridge maintains a Facility Ratings Methodology in accordance with FAC-001. FAC-008-1 R1.2.1 describes a non-exclusive list of the scope of equipment to be included in that Facility Ratings Methodology. FAC-008-1 does not affirmatively indicate that it should apply to generation interconnection lines. AE Power incorrectly did not interpret scope of FAC-008-1 to include the Generation Interconnection Line, and it did not have a documented rating for the Generation Interconnection Line.	FAC-009-1	R1	Medium	Moderate	In light of the nature of the alleged violation, offset by the aforementioned mitigating factors, ReliabilityFirst determined that the violation posed a moderate risk and not a serious or substantial risk to the reliability of the bulk power system (BPS). The risk to the reliability of the BPS presented by this violation was mitigated by several facts. Fowler Ridge indicates that it had correctly identified the most limiting element prior to revision of its facility ratings to include the Generation Interconnection Line. As a result, the most limiting component of the facility ratings did not change with the addition of the Generation Interconnection Line. The Fowler Ridge Wind Farm Complex has been in operation for just over two years, and in that time, Fowler Ridge has not experienced any system disturbances. Moreover, as wind-powered generating facilities, Fowler Ridge's facilities are intermittent in nature. Intermittent resources are characterized by a dependence on natural factors beyond the control of the resource operator for their energy production.	3/11/2009 (date Fowler Ridge registered on the Compliance Registry)	3/11/2011 (date Fowler Ridge revised its facility ratings to include the Generation Interconnection line)	\$15,000 (For RFC201100757, RFC201100758, and RFC201100759)	Self-report	Fowler Ridge revised its facility ratings to include a facility rating for the Generation Interconnection Line in which it has an undivided ownership interest.	3/11/2011	5/25/2011	Neither Admits nor Denies	ReliabilityFirst considered certain aspects of Fowler Ridge's compliance program as mitigating factors in assessing the penalty. The Regulatory Compliance Manager directly reports to the Vice President of Operations and Asset Management with an indirect reporting relationship to the Electric Regulatory Attorney on compliance matters. Fowler Ridge is also taking proactive measures to implement a computerized maintenance management system to ensure compliance matters are performed according to schedule.
ReliabilityFirst Corporation (ReliabilityFirst)	Fowler Ridge Wind II Farm LLC (Fowler Ridge II)	NCR03040	RFC201100758	Settlement Agreement	Fowler Ridge II submitted a self report on February 18, 2011 regarding a violation of FAC-009-1 R1. Fowler Ridge II, as a GO, failed to include its Generation Interconnection Line in its Facility Ratings. Prior to NERC's October 7, 2010 Recommendation to Industry entitled "Consideration of Actual Field Conditions in Determination of Facility Ratings," Fowler Ridge was not aware that it needed to include Facility Ratings for the Generation Interconnection Line. During due diligence performed in preparation to respond to the Recommendation, AE Power, the company that manages Fowler Ridge II's compliance program, discovered the issue. Fowler Ridge II maintains a Facility Ratings Methodology in accordance with FAC-001. FAC-008-1 R1.2.1 describes a non-exclusive list of the scope of equipment to be included in that Facility Ratings Methodology. FAC-008-1 does not affirmatively indicate that it should apply to generation interconnection lines. AE Power incorrectly did not interpret the scope of FAC-008-1 to include the Generation Interconnection Line, and it did not have a documented rating for the Generation Interconnection Line.	FAC-009-1	R1	Medium	Moderate	In light of the nature of the alleged violation, offset by the aforementioned mitigating factors, ReliabilityFirst determined that the violation posed a moderate risk and not a serious or substantial risk to the reliability of the bulk power system (BPS). The risk to the reliability of the BPS presented by this violation was mitigated by several facts. Fowler Ridge II indicates that it had correctly identified the most limiting element prior to revision of its facility ratings to include the Generation Interconnection Line. As a result, the most limiting component of the facility ratings did not change with the addition of the Generation Interconnection Line. The Fowler Ridge Wind Farm Complex has been in operation for just over two years, and in that time, Fowler Ridge II has not experienced any system disturbances. Moreover, as wind-powered generating facilities, Fowler Ridge II's generating facilities are intermittent in nature. Intermittent resources are characterized by a dependence on natural factors beyond the control of the resource operator for their energy production.	12/18/2009 (date Fowler Ridge II registered on the Compliance Registry)	3/11/2011 (date Fowler Ridge II revised its facility ratings to include the Generation Interconnection line)	\$15,000 (For RFC201100757, RFC201100758, and RFC201100759)	Self-report	Fowler Ridge II revised its facility ratings to include a facility rating for the Generation Interconnection Line in which it has an undivided ownership interest.	3/11/2011	5/25/2011	Neither Admits nor Denies	ReliabilityFirst considered certain aspects of Fowler Ridge II's compliance program as mitigating factors in assessing the penalty. The Regulatory Compliance Manager directly reports to the Vice President of Operations and Asset Management with an indirect reporting relationship to the Electric Regulatory Attorney on compliance matters. Fowler Ridge II is also taking proactive measures to implement a computerized maintenance management system to ensure compliance matters are performed according to schedule.

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ReliabilityFirst Corporation (ReliabilityFirst)	Fowler Ridge Wind III Farm LLC (Fowler Ridge III)	NCR10308	RFC201100759	Settlement Agreement	Fowler Ridge III submitted a self report on February 18, 2011 regarding a violation of FAC-009-1 R1. Fowler Ridge, as a GO, failed to include its Generation Interconnection Line in its Facility Ratings. Prior to NERC's October 7, 2010 Recommendation to Industry entitled "Consideration of Actual Field Conditions in Determination of Facility Ratings," Fowler Ridge III was not aware that it needed to include Facility Ratings for the Generation Interconnection Line. During due diligence performed in preparation to respond to the Recommendation, AE Power, the company that manages Fowler Ridge's compliance program, discovered the issue. Fowler Ridge III maintains a Facility Ratings Methodology in accordance with FAC-008-1. FAC-008-1 R1.2.1 describes a non-exclusive list of the scope of equipment to be included in that Facility Ratings Methodology. FAC-008-1 does not affirmatively indicate that it should apply to generation interconnection lines. AE Power incorrectly did not interpret the scope of FAC-008-1 to include the Generation Interconnection Line, and it did not have a documented rating for the Generation Interconnection Line, as required.	FAC-009-1	R1	Medium	Moderate	In light of the nature of the alleged violation, offset by the aforementioned mitigating factors, ReliabilityFirst determined that the violation posed a moderate risk and not a serious or substantial risk to the reliability of the bulk power system (BPS). The risk to the reliability of the BPS presented by this violation was mitigated by several facts. Fowler Ridge III indicates that it had correctly identified the most limiting element prior to revision of its facility ratings to include the Generation Interconnection Line. As a result, the most limiting component of the facility ratings did not change with the addition of the Generation Interconnection Line. The Fowler Ridge Wind Farm Complex has been in operation for just over two years, and in that time, Fowler Ridge III has not experienced any system disturbances. Moreover, as wind-powered generating facilities, Fowler Ridge III's generating facilities are intermittent in nature. Intermittent resources are characterized by a dependence on natural factors beyond the control of the resource operator for their energy production.	3/11/2009 (date Fowler Ridge III registered on the Compliance Registry)	3/11/2011 (date Fowler Ridge III revised its facility ratings to include the Generation Interconnection line)	\$15,000 (For RFC201100757, RFC201100758, and RFC201100759)	Self-report	Fowler Ridge III revised its facility ratings to include a facility rating for the Generation Interconnection Line in which it has an undivided ownership interest.	3/11/2011	5/25/2011	Neither Admits nor Denies	ReliabilityFirst considered certain aspects of Fowler Ridge III's compliance program as mitigating factors in assessing the penalty. The Regulatory Compliance Manager directly reports to the Vice President of Operations and Asset Management with an indirect reporting relationship to the Electric Regulatory Attorney on compliance matters. Fowler Ridge III is also taking proactive measures to implement a computerized maintenance management system to ensure compliance matters are performed according to schedule.
Western Electricity Coordinating Council (WECC)	Arlington Valley, LLC (AVGO)	NCR03051	WECC201002229	Settlement Agreement	On September 27, 2010, AVGO, as a Generator Owner that owns a generation Protection System, submitted a Self-Report citing possible noncompliance with PRC-005-1 R2.2 for failure to test and maintain its Protection System equipment. WECC determined that AVGO was in violation of R2.1 because AVGO was able to provide the date last tested but was not able to provide evidence of maintenance and testing completed within defined intervals for 8 out of its 25 electromechanical relays. The protective relays had not been maintained within the three-year interval defined in AVGO's Protection System maintenance and testing program. AVGO's maintenance schedule indicates its protective relays were tested on February 17, 2006 and again on June 18, 2009, exceeding its three-year interval by approximately four months. AVGO should have tested and maintained its electromechanical relays no later than February 17, 2009.	PRC-005-1	R2	High	Medium	WECC determined that this violation posed a minimal risk to the reliability of the bulk power system (BPS) because all protective relays were tested shortly after the defined period (four months) and were verified to operate properly. In addition, AVGO has three generating units totaling 599 MW of generation. WECC determined that the loss of generation would have a minimal impact on the BPS.	2/18/2009 (the day after the protective relays were due to be tested within the defined three-year interval)	6/18/2009 (when the protective relays were actually tested)	\$44,000 (for WECC201002229 and WECC201002275)	Self-Report	Upon discovering the violation, AVGO promptly performed the testing and maintenance to correct the noncompliance. AVGO submitted a mitigation plan which addresses implementing a new Protection System maintenance and testing program that allows extra time for completion of maintenance and testing should scheduling issues arise. Specifically, in respect to its electromechanical relays, AVGO revised its Protection System maintenance and testing program to allow for relay to be tested and maintained within six months of the originally scheduled maintenance and testing date.	9/15/2010	10/27/2010	Agrees and Stipulates to the Facts of the Settlement Agreement	Prior to November 30, 2009, the AVGO generating facilities were encompassed in the former registration of Dynegey Arlington Valley, LLC (DYAV) (NCR05135) and Dynegey Inc. (DYN) (NCR00200). On or about November 30, 2009, there was a transfer of ownership and facility assignment associated with registration changes resulting in AVGO being responsible for compliance activities for the AVGO generation facilities and one additional facility originally owned by DYN. WECC applied as an aggravating factor that DYN had a prior violation of the same standard and considered the instant violation a second instance of noncompliance. On July 14, 2009, DYN submitted a Self-Certification for the first instance of noncompliance. In the first instance, station batteries were not maintained and tested within the interval defined in DYN's Protection System maintenance and testing program, as required by R2.1. WECC verified DYN's completion of the mitigation plan for the first violation on October 5, 2009. WECC did not take into account other DYN violations in other regions. WECC feels that the settlement penalty amount of \$44,000 for two PRC
Western Electricity Coordinating Council (WECC)	Arlington Valley, LLC (AVGO)	NCR03051	WECC201002275	Settlement Agreement	On October 26, 2010, AVGO, as a Generator Owner that owns a generation Protection System, submitted a Self-Report citing possible noncompliance with PRC-005-1 R2 for failure to test and maintain its Protection System equipment within defined intervals. WECC determined AVGO had not tested and maintained three out of five station batteries, part of AVGO's Protection Systems, within defined intervals. AVGO's maintenance and testing program requires inspections on Protection System batteries to be performed monthly, plus seven days. AVGO documented inspections were performed on August 18, 2010 and August 19, 2010, but AVGO did not complete its subsequent inspections until September 29, 2010 and September 30, 2010. These testing intervals exceeded AVGO's maintenance and testing program interval by four days on three of its batteries.	PRC-005-1	R2	High	High	WECC determined that this violation posed a minimal risk to the reliability of the bulk power system (BPS) because all three batteries were tested shortly after the defined period (four months) and were verified to operate properly. In addition, AVGO has three generating units totaling 599 MW of generation. WECC determined that the loss of generation would have a minimal impact on the BPS.	9/26/2010 (the day after the batteries were due to be tested within the defined interval)	9/30/2010 (when the batteries were actually tested)	\$44,000 (for WECC201002229 and WECC201002275)	Self-Report	Upon discovering the violation, AVGO promptly performed the testing and maintenance to correct the noncompliance. AVGO submitted a mitigation plan which states that it conducted PRC-005 training for all its operations, maintenance and management personnel on-site. Specifically, AVGO implemented a new maintenance tracking system in accordance with its revised Protection System maintenance and testing program. The new tracking system is designed to ensure action items are tracked based on its defined intervals as opposed to calendar dates.	12/17/2010	1/5/2011	Agrees and Stipulates to the Facts of the Settlement Agreement	Prior to November 30, 2009, the AVGO generating facilities were encompassed in the former registration of Dynegey Arlington Valley, LLC (DYAV) (NCR05135) and Dynegey Inc. (DYN) (NCR00200). On or about November 30, 2009, there was a transfer of ownership and facility assignment associated with registration changes resulting in AVGO being responsible for compliance activities for the AVGO generation facilities and one additional facility originally owned by DYN. WECC applied as an aggravating factor that DYN had a prior violation of the same standard and considered the instant violation a second instance of noncompliance. On July 14, 2009, DYN submitted a Self-Certification for the first instance of noncompliance. In the first instance, station batteries were not maintained and tested within the interval defined in DYN's Protection System maintenance and testing program, as required by R2.1. WECC verified DYN's completion of the mitigation plan for the first violation on October 5, 2009. WECC did not take into account other DYN violations in other regions. WECC feels that the settlement penalty amount of \$44,000 for two PRC

**Attachment A-1
October 31, 2011 Public Spreadsheet Notice of Penalty Spreadsheet
(NON-CIP Violations)**

Region	Registered Entity	NCR_ID	NERC Violation ID #	Notice of Confirmed Violation or Settlement Agreement	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" "Neither Admits nor Denies" "Agrees and Stipulates to the Facts" or "Does Not Contest"	Factors Affecting the Penalty and Other Considerations
Western Electricity Coordinating Council (WECC)	Kings River Conservation District (KRCD)	NCR05505	WECC201102430	Settlement Agreement	On February 17, 2011, KRCD, as a Generator Owner, submitted a Self-Report addressing its noncompliance with PRC-005-1 R2.1. According to the Self-Report, KRCD's Generator Protection System Maintenance and Testing Program requires monthly inspections of battery systems. The program further indicates that batteries are maintained and tested according to manufacturer's recommendations and/or industry standards. During an internal inspection of battery maintenance records, KRCD discovered that not all inspections were performed within the one-month plus 5 day grace period as specified in its program. A further detailed inspection of KRCD's battery maintenance records found that not all elements of the battery inspection program had been regularly performed as part of the current inspection practice. On March 25, 2011, a WECC Subject Matter Expert (SME) reviewed KRCD's Self-Report and determined that KRCD could not provide evidence of maintenance and testing within defined intervals for 9 monthly battery inspections. Specifically, KRCD missed 3 monthly inspections at the Pine Flat Generating station.	PRC-005-1	R2.1	High	Severe	WECC determined that this violation posed a minimal and not serious or substantial risk to the reliability of the bulk power system because although KRCD could not provide evidence of Protection System maintenance and testing within the defined intervals for 9 required monthly battery inspections, KRCD had performed most of its maintenance and testing in accordance with its maintenance and testing plan. All of KRCD's battery voltages were consistently monitored in the control room at the Malaga Generation station. Additionally, a low voltage alarm is located at the Pine Flat Control Room where operators monitor voltages routinely. Any abnormal voltage conditions are immediately brought to the operator's attention and appropriate action is taken. KRCD's low voltage alarm was not triggered by any of the failed battery inspections. Moreover, KRCD maintained and tested its other Protection system devices in accordance with its plan.	2/1/2008 (when KRCD first missed its monthly battery inspection)	12/7/2010 (Mitigation Plan completion)	\$9,000	Self-Report	KRCD completed and documented the next monthly battery maintenance scheduled and all monthly battery inspections are current on KRCD's schedule. KRCD modified its electronic maintenance and tracking system at Malaga (MP2) to prevent KRCD from missing more than one month of battery inspections. KRCD reviewed the Protection System Maintenance and Testing Program battery Maintenance and Testing requirements with all involved maintenance personnel to ensure they are aware of the importance of completing work orders on time and ensuring the proper evidence has been documented. KRCD now requires hardcopies of monthly battery records be submitted to the Maintenance Supervisor for review within five days of completion of the work. Finally, KRCD's Internal Compliance Program (ICP) personnel will review monthly battery records on a quarterly basis to ensure all work is complete.	12/7/2010	5/11/2011	Agrees and Stipulates to the Facts	WECC reviewed KRCD's ICP and considered it a mitigating factor in penalty determination. WECC found that: KRCD's ICP is documented; the ICP is disseminated throughout its operation staff; KRCD has ICP oversight staff; ICP oversight staff is supervised at a high level in the organization; the ICP oversight staff has independent access to the General Manager and/or board of directors; KRCD operates the ICP such that it is somewhat independent of staff responsible for compliance with the Reliability Standards; the ICP has the support and participation of senior management; KRCD reviews and modifies its ICP regularly; KRCD's ICP includes formal, internal self-auditing for compliance with all Reliability Standards on a periodic basis; and KRCD's ICP includes disciplinary action for employees involved in violations of the Reliability Standards, when applicable.
Western Electricity Coordinating Council (WECC)	PPL Montana, LLC (PPLM)	NCR05329	WECC201102402	Settlement Agreement	On January 10, 2011, PPLM, as a Generator Operator, self-reported a potential violation of VAR-002-1.1 b R3. A WECC subject matter expert (SME) reviewed PPLM's Self-Report and concluded that on October 10, 2010, PPLM did not notify NorthWestern Energy (NWE) its associated Transmission Operator (TOP), that the Power System Stabilizer (PSS) on its Colstrip Steam Electric Station (Colstrip) Unit No. 2 was out of service. NWE was not informed of the service interruption until 48.2 hours later when the PSS returned to service. Additionally, the WECC SME concluded that on November 1, 2010, PPLM failed for a second time to notify NWE that its PSS on Colstrip Unit No. 2 was out of service for approximately 36 minutes. Based on the Self-Report and supporting evidence, WECC concluded that PPLM was in violation of VAR-002-1.1b R3.	VAR-002-1.1b	R3	Medium	Moderate	WECC determined that this violation posed a minimal risk and not a serious or substantial risk to the reliability of the bulk power system (BPS). PPLM's Colstrip is comprised of four generators. During the times the PSS on Colstrip Unit No. 2 was out, the other units at Colstrip were operating and capable of responding to any need for system damping. For these reasons, WECC has determined that PPLM's violation posed a minimal risk to the BPS.	10/10/2010 (date of first instance)	10/12/2010 (when the TOP was notified of the first instance) 11/1/2010 (date of second instance)	\$14,000	Self-Report	1. The Colstrip operations specialist sent an email to relevant crews reminding them of the requirement to notify PPLM's associated TOP, the NWE Systems Operation Control Center (SOCC), of a status or capability change on any generator Reactive Power resource. This notification included the status of each automatic voltage regulator and PSS and the expected duration of the change in status or capability. 2. The operations specialist ensured that all PSS alarms include the words "Call SOCC" which is an indication for the Generator Operator to contact the SOCC in order to notify NWE of the status/capability change. 3. PPLM conducted reinforcement training for the affected operators of the need to notify the SOCC for all status/capability changes specified in R3. 4. The plant control systems on all four Colstrip units were configured to send email messages to certain supervisors and to appropriate SOCC personnel when there is any change in PSS (or AVR) status, as specified in R3. 5. A dashboard light for PSS/AVR alarms was added to the unit overview screen for each Colstrip Unit. These "dashboards" were added to the unit overview screen. 6. The priority of the PSS/AVR alarms was raised from "Priority 2" to "Priority 1". 7. The plant control system has been programmed to automatically notify the SOCC when a PSS/AVR alarm occurs.	3/12/2011	8/16/2011	Admits	WECC considered PPLM's internal compliance program (ICP), which was in place at the time of the violation, a mitigating factor. WECC found that PPLM's ICP is documented, the ICP is disseminated throughout its operations staff and that PPLM has ICP oversight staff. PPLM's ICP oversight staff is supervised at a high level in the organization. Key compliance personnel have independent access to the CEO and/or board of directors. PPLM operates the ICP such that it is independent of staff responsible for compliance with the Reliability Standards. PPLM has allocated sufficient resources to its ICP which has the support and participation of senior management. PPLM reviews and modifies its ICP regularly which includes formal, internal self auditing for compliance with all Reliability Standards on a periodic basis. PPLM's ICP includes disciplinary action for employees involved in violations of the Reliability Standards, when applicable. This violation was PPLM's second assessed violation of VAR-002-1 R3. WECC previously determined PPLM violated the Standard on several instances in 2007 and 2008. In the prior cases, WECC determined that PPLM's ICP was not documented, the ICP was not disseminated throughout its operations staff, and PPLM did not have ICP oversight staff.