**The Life of A Violation**

1st Stage: Triage

- **Compliance Issue Discovered** (CMEP 3.1-3.8)
  - 1 of 7 monitoring methods: self-report, self-certification, compliance audit, spot-check, etc.
- **Preliminary Screen (CMEP 5.1)**
  - Conducted by Compliance audit staff:
    - Is requirement applicable to your registered functions?
- **Notice of Preliminary Screen** (NPS) issued. (CMEP 5.1)
  - Puts Entity, Region, NERC, and FERC on notice of compliance issue.
- **Compliance Issue Assessment** (CMEP 5.2)
  - Includes, risk assessment, scope determination, and violation duration determination.

Within 5 business days

2nd Stage: Violation Processing

- **Mitigation Processing (MP)** Stage (CMEP 6.0-6.7)
  - Can occur at any time during Triage or Violation Processing stage
  - Entity Submits MP
    - If accepted
      - Region accepts or rejects MP
      - Entity certifies completion of MP and provides supporting evidence and Region reviews evidence to confirm completion
    - If rejected
      - Requires MP Cert of Compl.
      - submitted and minimal to moderate impact
      - If determination of no violation is made after NPV issuance
        - Notice of Penalty processing
        - PV Assessment Made:
          - 1st Stage: Triage
          - 2nd Stage: Violation Processing
            - Requires submission of acceptable MP
            - Yes
              - Settlement request accepted?
                - Yes
                  - Sett. draft & penalty determination CMEP App. 4B
                  - Settlement negotiations CMEP 5.6
                  - Executed Sett./NOCV CMEP 5.6, 5.8
                  - Final documents drafted and submitted to NERC, and from NERC to FERC
                - No
                  - Notice of Penalty processing
                  - NAVAPS draft and penalty determination CMEP App. 4B
                  - Entity can accept or contest NAVAPS CMEP (5.3-5.7)
          - No
            - Notice of Penalty processing
            - CDMS settlement request
            - FFT Treatment Warranted? See 138 FERC ¶ 61,193
              - Yes
                - Requires submission of acceptable MP
                - Sett. draft & penalty determination CMEP App. 4B
                - Settlement negotiations CMEP 5.6
                - Executed Sett./NOCV CMEP 5.6, 5.8
                - Final documents drafted and submitted to NERC, and from NERC to FERC
              - No
                - Notice of Penalty processing
                - CDMS settlement request

Within 60 days

**PV Assessment Made:**

- Ends with issuance of Notice of Possible Violation or Letter of Dismissal.

If found compliant

- Dismissal CMEP 5.2

Additional evd. requested

If evidence provided is sufficient to demonstrate mitigation completion, Region verifies completion

Sufficient evd. provided

If evidence provided is sufficient to demonstrate mitigation completion, Region verifies completion

**Notice of Possible Violation Issued**

**Please contact Enforcement staff with questions:** [SPP.org/Regional Entity/Staff](http://SPP.org/Regional Entity/Staff)