Helping our members work together to keep the lights on... today and in the future
Compliance Enforcement Update on Processing Violations

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Introduction

Discussion Topics:

• Justifications for Dismissing Violations
• Submission of Detailed Self Reports
• Administrative Citation Process Violations
• SPP RE Acceptance of Mitigation Plans
Justifications for Dismissing Violations

- After concluding its investigation, SPP RE determines there is not a reasonable basis to support a violation
- Consolidation of violations
Submission of Detailed Self Reports

• Self Reports are Encouraged

• Increase in deficient Self Reports
  – vague violation details
  – scope of the violation is lacking

• Generally, an Entity should conduct a thorough investigation of a possible violation before submitting a Self Report

• Update SPP RE of any additional discovered facts or circumstances

• Potential monetary benefit in submitting thorough Self Reports
Administrative Citation Process Violations

• Candidates for ACP violations
  – Must be a minimal or moderate risk to the BPS
  – Completed Mitigation Plan

• Advantages
  – Administrative Efficiency
  – Shortened Timeline

SPP RE Acceptance of Mitigation Plans

• CMEP requires submission of Mitigation Plans
• Submission of a Mitigation Plan is not an admission of guilt
• Mitigation Plans must be submitted within 30 days of a Notice of Alleged Violation and Proposed Penalty or Sanction (NAVAPS)
• SPP encourages early submission of Mitigation Plans
• Generally, SPP RE will not execute a settlement agreement prior to completion of a Mitigation Plan
SPP RE Acceptance of Mitigation Plans

• Prior to the issuance of a Notice of Confirmed Violation, OR executed settlement agreement, SPP RE will “provisionally accept” submitted Mitigation Plans

• Upon acceptances of Mitigation Plans, Entities will receive a CDMS email notifying it of the “provisional acceptance”

• If scope changes, Enforcement will require an Amended Mitigation Plan
  – Upon submission of Amended Mitigation Plans, Enforcement will go through the acceptance review process again
SPP RE Acceptance of Mitigation Plans

- Acceptance process is consistent with CMEP
- No substantive change in Enforcement’s acceptance review procedures
- Upon the issuance of a Notice of Confirmed Violation or an executed settlement agreement, the Mitigation Plan acceptance becomes final
Questions