NERC 3 Year Assessment of SPP RE

NERC Comments:

- **NERC found SPP RE to be one of the less effective Regional Entities in administering compliance program to date.**
- **SPP RE second slowest to determine if possible violation is alleged violation.**
- **Only 17% of alleged violations have been approved by the BOTCC.**

SPP RE Response:

- **NERC staff attributed "less effective" rating largely to slow processing**
- **NERC did not acknowledge SPP RE 2010 budget request to significantly increase compliance staffing levels (from 6 to 14) to address processing timelines.**
- **SPP RE ranked 1st in % of Confirmed Violations submitted to NERC for review.**
- **NERC staff did not take into consideration that the relatively low 17% of alleged violations approved by BOTCC is driven by NERC's decision to not present the remaining SPP RE cases to the BOTCC at this time.**

NERC 3-Year Self Assessment

NERC Comment	SPP RE Response/Action
Only 17% of submitted alleged violations approved by BOTCC	•NERC holding cases pending FERC decision •SPP RE 1st in terms of % Confirmed Violations submitted to NERC for review
SPP RE 8th (out of 8) in terms of FTEs committed to compliance	SPP RE 2010 budget authorizes adding 8 FTEs to compliance area
NERC and FERC have had issues with depth and thoroughness of SPP RE audits	•In 3 years only one identified concern •Process improvements identified and implemented
Events within SPP RE footprint that NERC and FERC became aware of with which SPP RE had no knowledge	•Only instance identified was anonymous complaint to FERC •SPP RE enhancing situational awareness capabilities
Second slowest to determine if possible violation is alleged violation	•Statistic heavily driven by 2007 violations •2007 61 days •2008 19 days •2009 7 days