Enforcement Update

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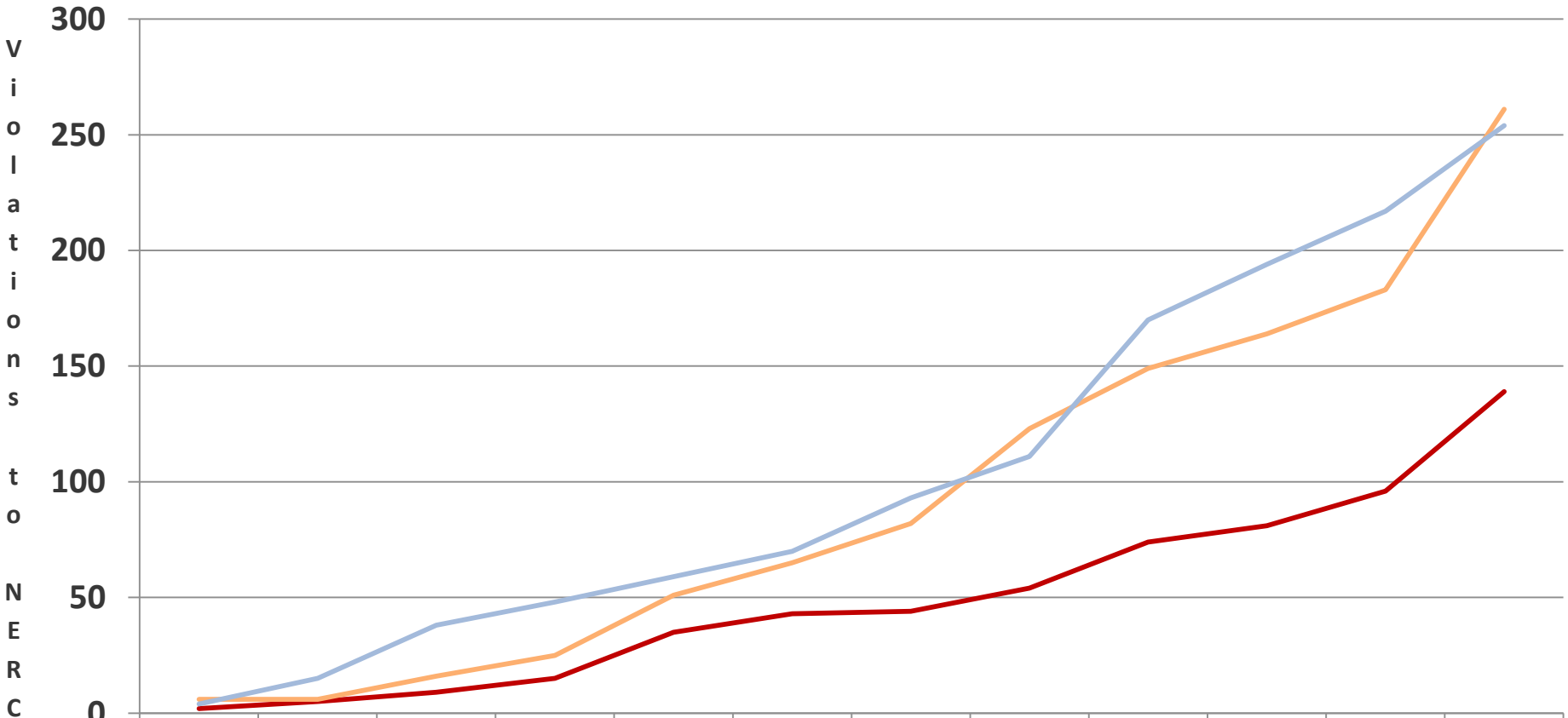
SPP Southwest Power Pool Regional Entity

SPP RE Enforcement Activities December 31, 2012	2007	2008	2009	2010	2011	First Quarter	Second Quarter	Third Quarter	October	November	December	Total 2012
NPV												
Issued	6	56	132	254	239	57	44	34	18	18	2	173
NAVAPS												
NAVAPS Issued	6	45	10	7	0	0	2	0	0	0	0	2
NOCV												
NOCV Sent to Entity/NERC	0	8	25	15	4	0	0	1	0	0	0	1
NOCV BOTCC Approved	0	7	11	29	4	0	0	1	0	0	0	1
Settlements												
To NERC for Approval	0	0	0	89	118	12	7	65	11	14	22	131
BOTCC Approved	0	0	0	50	81	73	5	13	6	4	51	152
Administrative Citations												
To NERC for Approval	0	0	0	16	22	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BOTCC Approved	0	0	0	0	38	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Find, Fix, Track												
To NERC for Approval	-	-	-	-	43	15	13	21	10	8	11	78
BOTCC Approval	-	-	-	-	36	16	19	16	7	3	13	74
Dismissals												
To NERC/SPP RE SRT for Approval	0	0	1	16	75	11	12	16	4	0	0	43
NERC/SPP RE SRT Approved		0	1	16	75	11	12	16	4	0	0	43
Notice of Penalty/FFTR												
Approved by FERC	0	5	13	57	180	60	45	36	10	17	16	184
Violations Awaiting BOTCC Approval											64	
Active Violations - Caseload											168	
Caseload Index (months)*											7.7	

* Based on 2011 process rate of 21.8 violations/month.

Enforcement Monthly Violation Processing



	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sep	Oct	Nov	Dec
2010	2	5	9	15	35	43	44	54	74	81	96	139
2011	6	6	16	25	51	65	82	123	149	164	183	261
2012	4	15	38	48	59	70	93	111	170	194	217	254

Running Total Violations

Enforcement Caseload – December 31, 2012

- 168- Open Violations
  - 12 - Joint Settlement w/ Other Regions
    - 1 – NAVAPS
    - 42 - Settlement
    - 113 - Settlement Not Requested (NAVAPS/NOCV)
- 65 - 693 Violations
- 103 - CIP Violations
- 46 – High Impact Violations
- Discovery Method
  - 71 - Audit
  - 75 - Self Report
  - 12 - Self Certification
  - 3 - Spot Check
  - 7 - Investigation

VIOLATION AGING TABLE as of November 30, 2012	< 50 days	50-100 days	101-200 days	201-300 days	>300 days
Violations (No Navaps/ Settlement)	26	18	29	22	41
NAVAPS Issued/ No NOCV or Settlement	0	0	1	0	0
In Settlement but Settlement Agreement not Approved	20	9	13	1	8

VIOLATION AGING TABLE as of December 31, 2012	< 50 days	50-100 days	101-200 days	201-300 days	>300 days
Violations (No Navaps/ Settlement)	4	29	26	18	36
NAVAPS Issued/ No NOCV or Settlement	0	0	1	0	0
In Settlement but Settlement Agreement not Approved	0	29	6	1	4

Violations Older than 300 Days

	2008	2009	2010	2011	2012
Violations (No NAVAPS/Settlement)	0	0	7	21	7
NAVAPS Issued / No Settlement	0	0	1	0	0
In Settlement /Settlement Agreement not Approved	1	0	1	2	0

High Impact Violation* Summary

- **46 – Open High Impact Violations**
  - 11 – Mitigation Plan Complete
  - 17 – Mitigation Plan Accepted
  - 0 – Not Submitted
  - 0 – Mitigation Plan Work In Progress
  - 18 – Mitigation Plan Initiated (No Action)
- **Metric**
  - 18 – High Impact Violations w/o Mitigation Plans or NAVAPS
  - 2 – Mitigation Plans Accepted in December
  - 0 – Dismissed
  - 5 - Closed
  - 100.2 - Day Running Average for all High Impact Violations

* As noted in our 2012 Metrics (see 1/30/12 Trustee meeting minutes, attachment 5B), HI violations are violations with a High Violation Risk Factor (VRF) and the following Medium and Low VRF violations as identified by Compliance staff: COM-002-2 R2, CIP-002-3 R2, CIP-002-3 R3, CIP-005-3a R2, CIP-005-3a R3, CIP-007-3 R2, CIP-007-3 R3, CIP-007-3 R6, and PRC-005 R2.

December Mitigation Plan Metric Results

- **Mitigation Plan Acceptance Review**
  - 10 - Mitigation Plans Submitted
  - 15 - Mitigation Plans accepted < 30 days
  - 0 – Mitigation Plans accepted > 30 days
  - 12.5 – Average Days to Accept (Year to Date)
- **Mitigation Completion Reviews**
  - 21 - Mitigation Plans Certified as Complete
  - 8 - Mitigation Plan Completion Reviews Completed
  - 13 - Under Review
  - 21.4 - Average Days in Review (Year to Date)

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