Helping our members work together to keep the lights on... today and in the future

SPP Southwest Power Pool Regional Entity

Enforcement Update

April 29, 2013

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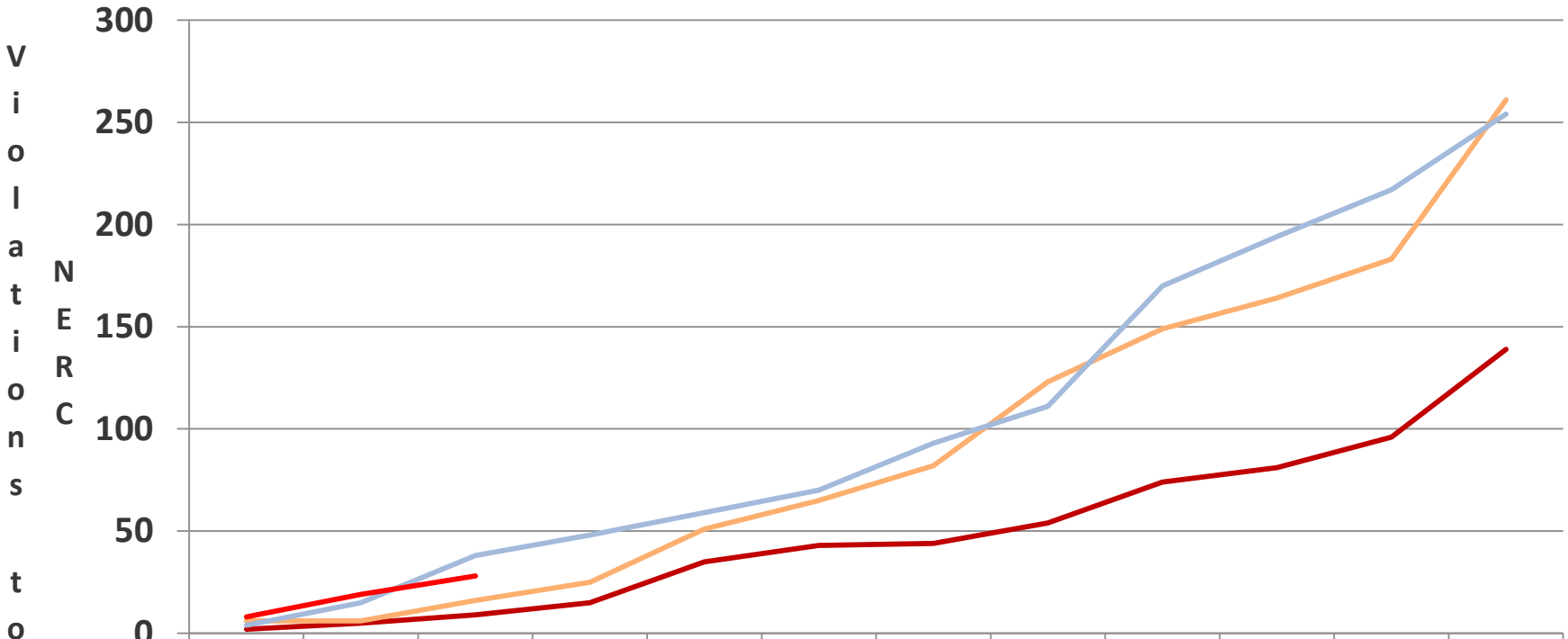
SPP Southwest Power Pool Regional Entity

SPP RE Enforcement Activities March 31, 2013	2007	2008	2009	2010	2011	2012	January	February	March	Total 2013
NPV										
Issued	6	56	132	254	239	173	4	46	6	56
NAVAPS										
NAVAPS Issued	6	45	10	7	0	2	0	0	0	0
NOCV										
NOCV Sent to Entity/NERC	0	8	25	15	4	1	0	0	0	0
NOCV BOTCC Approved	0	7	11	29	4	1	0	0	0	0
Settlements										
To NERC for Approval	0	0	0	89	118	131	2	0	3	5
BOTCC Approved	0	0	0	50	81	152	2	5	28	35
Administrative Citations										
To NERC for Approval	0	0	0	16	22	N/A	N/A	N/A	0	N/A
BOTCC Approved	0	0	0	0	38	N/A	N/A	N/A	0	N/A
Find, Fix, Track										
To NERC for Approval	-	-	-	-	43	78	5	3	6	14
BOTCC Approval	-	-	-	-	36	74	7	2	7	16
Dismissals										
To NERC/SPP RE SRT for Approval	0	0	1	16	75	43	4	3	2	9
NERC/SPP RE SRT Approved		0	1	16	75	43	4	3	1	8
Notice of Penalty/FFTR										
Approved by FERC	0	5	13	57	180	184	59	4	6	76
Violations Awaiting BOTCC Approval									25	
Active Violations - Caseload									195	
Caseload Index (months)*									9.2	

* Based on 2012 process rate of 21.1 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
2013	8	19	28									

Running Total Violations

Enforcement Caseload – March 31, 2013

- 195- Open Violations

  22 - Joint Settlement w/ Other Regions
  1 – NAVAPS
  38 - Settlement
  134 - Settlement Not Requested (NAVAPS/NOCV)
  45 – Administrative Hold

- 73 - 693 Violations
- 122 - CIP Violations
- 69 – High Impact Violations
- Discovery Method

  66 - Audit
  86 - Self Report
  17 - Self Certification
  4 - Spot Check
  22 - Investigation

Violation Aging

VIOLATION AGING TABLE as of February 28, 2013	< 50 days	50-100 days	101-200 days	201-300 days	>300 days
Violations (No Navaps/ Settlement)	49	1	25	10	23
NAVAPS Issued/ No NOCV or Settlement	0	0	0	1	0
In Settlement but Settlement Agreement not Approved	0	1	25	5	4

VIOLATION AGING TABLE as of March 31, 2013	< 50 days	50-100 days	101-200 days	201-300 days	>300 days
Violations (No Navaps/ Settlement)	21	33	14	13	18
NAVAPS Issued/ No NOCV or Settlement	0	0	0	1	0
In Settlement but Settlement Agreement not Approved	0	2	22	6	4

Violations Older than 300 Days

	2008	2009	2010	2011	2012
Violations (No NAVAPS/Settlement)	0	0	1	6	11
NAVAPS Issued / No Settlement	0	0	0	0	0
In Settlement /Settlement Agreement not Approved	0	0	1	3	0

High Impact Violation* Summary

- **69 – Open High Impact Violations**
  - 1 – NAVAPS / Hearing
  - 17 – Settlement
  - 3 - Multi Region
  - 15 – Administrative Hold
  - 12 – Disposition Undetermined
- **Open High Impact Violations Mitigation Status**
  - 16 – Mitigation Plan Complete
  - 21 – Mitigation Plan Accepted
  - 2 – Submitted
  - 0 – Mitigation Plan Work In Progress
  - 30 – Mitigation Plan Initiated (No Action)

* As noted in our 2013 Metrics , 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.

March Mitigation Plan Summary

- **Mitigation Plan Status (March / Year)**

Submitted	13 / 34
Accepted	7 / 23
Certified Complete	6 / 17
Completion Verified	4 / 18

- **Violations with no Mitigation Plans**

Work in Progress	9
Initiated	96

Enforcement Emerging Issues

- Paragraph 81 Violations
- NERC CIP Version 3 to CIP Version 5 Guidance

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