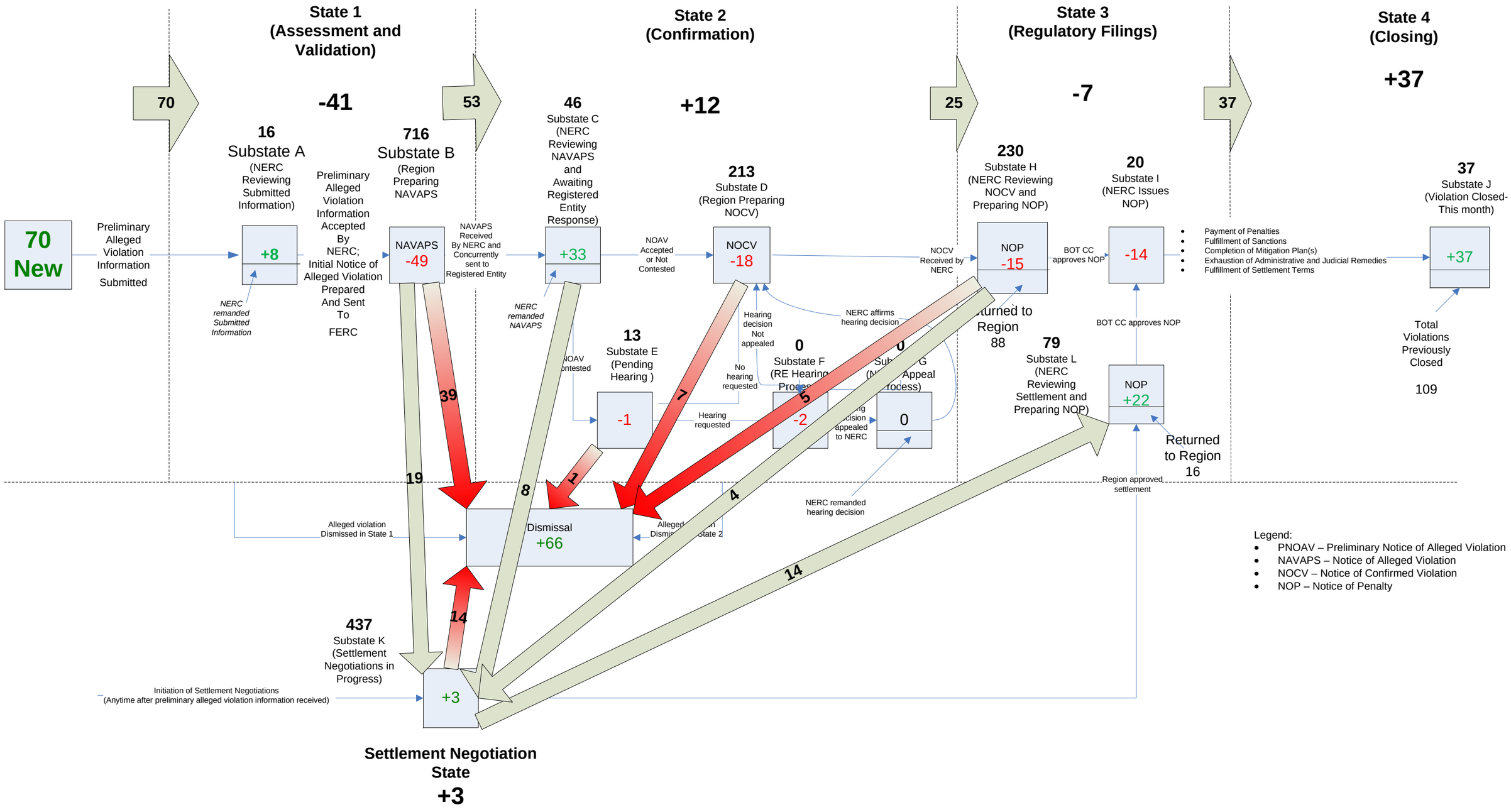
Violation Process States and Underlying Process Sub states

Snapshot comparison between May 1, 2009 and May 31, 2009



Legend:

- PNOAV – Preliminary Notice of Alleged Violation
- NAVAPS – Notice of Alleged Violation
- NOCV – Notice of Confirmed Violation
- NOP – Notice of Penalty

Violation Process State Summary Table — Active FERC Enforceable Alleged Violations

Below is a breakdown, as of May 31, 2009, of the Compliance Monitoring and Enforcement Program (CMEP) Violation "state" summary for the 1807 active violations.

	State 1 (Assessment and Validation)		State 2 (Confirmation)					Settlement	State 3 (Regulatory Filings)			State 4 (Closing)	
Region	Substate A (NERC Reviewing)	Substate B (Region Preparing NAVAP)	Substate C (NERC Reviewing NAVAP and awaiting RE Response)	Substate D (Region Preparing NOCV)	Substate E (Pending Hearing)	Substate F (RE Hearing Process)	Substate G (NERC Appeal Process)	Substate K (Settlement Negotiations)	Substate H (NERC Reviewing NOCV)	Substate L (NERC Reviewing Settlement Agreement)	Substate I (NERC Issues NOP)	Substate J (Violation Closes)	Total
FRCC	7	16	0	0	0	0	0	94	49	0	0	2	**168**
MRO	0	20	0	0	0	0	0	4	17	3	17	3	**64**
NCEA	0	3	0	0	0	0	0	0	0	0	0	0	**3**
NPCC	0	0	0	0	0	0	0	29	4	12	0	1	**46**
RFC	0	48	0	0	0	0	0	57	12	6	1	0	**124**
SERC	1	42	0	1	0	0	0	73	5	22	2	19	**165**
SPP	0	15	0	3	0	0	0	12	41	1	0	0	**72**
TRE	0	18	0	0	0	0	0	13	6	5	0	12	**54**
WECC	8	554	46	209	13	0	0	155	96	30	0	0	**1111**
TOTAL	**16**	**716**	**46**	**213**	**13**	**0**	**0**	**437**	**230**	**79**	**20**	**37**	**1807**
Percentage of Total	**0.89%**	**39.62%**	**2.55%**	**11.79%**	**0.72%**	**0.00%**	**0.00%**	**24.18%**	**12.73%**	**4.37%**	**1.11%**	**2.05%**	
State Totals	**732**		**272**					**437**	**329**			**37**	

Definitions

Substate A = Preliminary Notice of Alleged violation information has been received from the Region but no Initial Notice has been issued to FERC.
Substate B = NERC is awaiting receipt of Notice of Alleged Violation Proposed Penalty or Sanction from the Region.
Substate C = NERC has received Notice of Alleged Violation Proposed Penalty or Sanction and is awaiting acceptance, auto acceptance or contest.
Substate D = Region received acceptance letter from Registered Entity, or 30 day clock expired and violation is Auto Accepted and is now Confirmed.
Substate E = Region has received letter contesting violation from Registered Entity.
Substate F = Region has received request for Hearing from Registered Entity.
Substate G = NERC has received request for Appeal from Registered Entity.
Substate H = NERC has received a Notice of Confirmed Violation from the Region.
Substate I = Violation is Confirmed/Settled and a Notice of Penalty has been issued by NERC to Registered Entity and submitted to FERC.
Substate J = Payment of Penalties, Fulfillment of Sanctions, Completion of Mitigation Plan, Exhaustion of Administrative and Judicial Remedies, and Fulfillment of Settlement terms have all been met and violation is closed.
Substate K = Settlement negotiations are in progress.
Substate L = NERC has received a Settlement Agreement from the Region.

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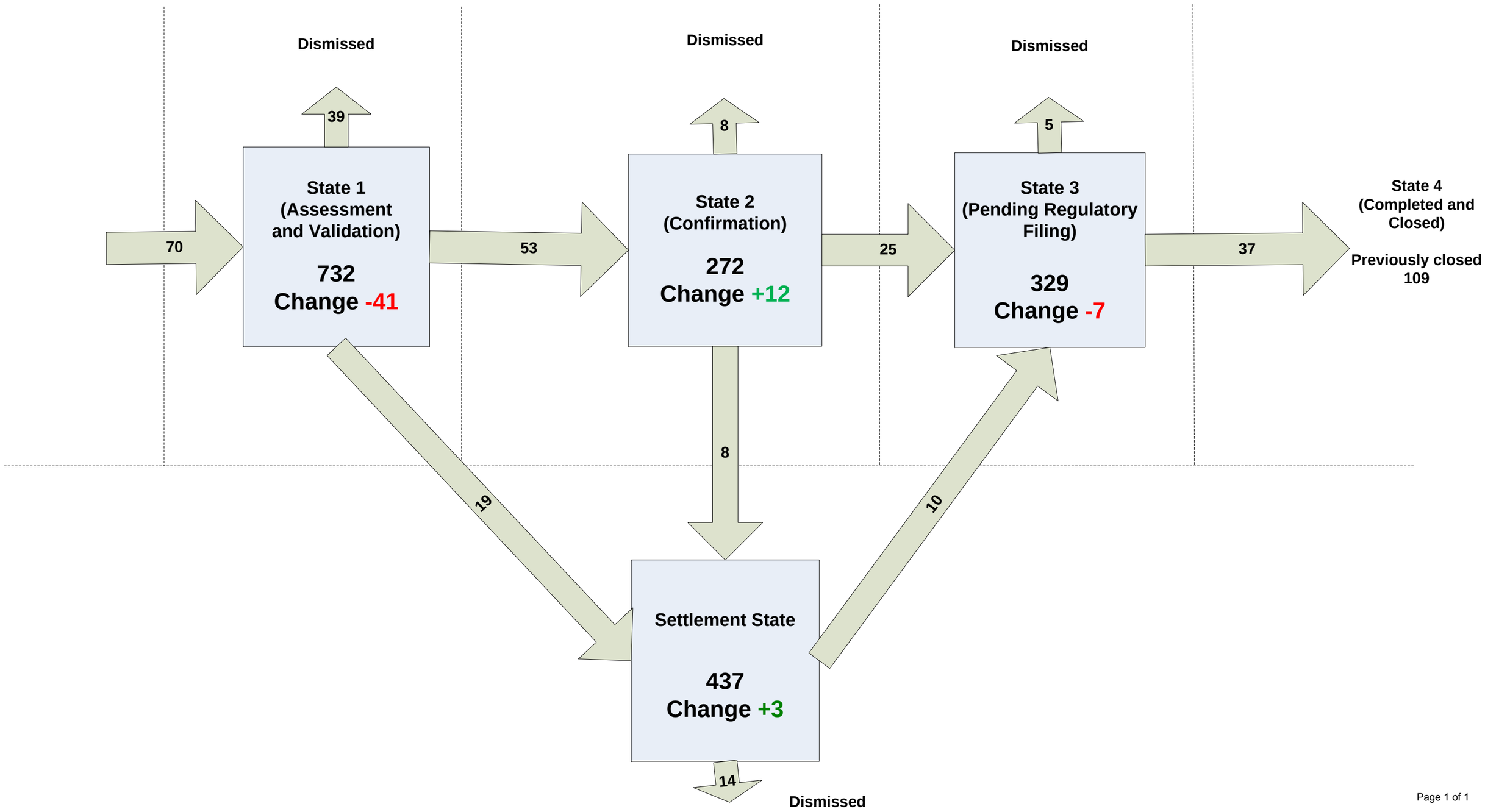
* Includes new violations received through 5/31/2009.
Report Date:6/1/2009

Violation Process States

Snapshot comparison between May 1, 2009 and May 31, 2009



Pending Violations Summary by Process Steps
FERC Enforceable Alleged Violations Summarized by State

Below is a breakdown, as of May 31, 2009, of the Compliance Monitoring and Enforcement Program (CMEP) Violation Process Steps summarized by State for the 1770 FERC enforceable violations.

	STATE 1	STATE 2		STATE 3	STATE 4		
	Assessment and Validation	Confirmation	Settlement Negotiations	Pending Regulatory Filing	Completed and Closed		
Region						Total Active	% Closed to Total
FRCC	23	0	94	49	2	166	1%
MRO	20	0	4	37	10	61	14%
NCEA	3	0	0	0	0	3	0%
NPCC	0	0	29	16	13	45	22%
RFC	48	0	57	19	1	124	1%
SERC	43	1	73	29	93	146	39%
SPP	15	3	12	42	5	72	6%
TRE	18	0	13	11	22	42	34%
WECC	562	268	155	126	0	1111	0%
TOTAL	732	272	437	329	146	1770	8%

* Includes new violations received through 5/31/2009.

Report Date: 6/1/2009

Summary of all Post June 18th Alleged Violations by Region

Below is a breakdown, as of May 31, 2009 of the Compliance Monitoring and Enforcement (CMEP) alleged violation summary for all 2764 violations.

	Dismissed	Previously Closed	Newly Closed	FERC Enforceable			Total Canadian Violations	Total
				Total	Normalized by Registered Entity	% Non-Document Related		
FRCC	15	0	2	166	2.37	55%	0	183
MRO	20	7	3	61	0.52	62%	6	97
NCEA	0	0	0	3	1.00	100%	0	3
NPCC	9	12	1	45	0.17	33%	5	72
RFC	17	1	0	124	0.35	67%	0	142
SERC	43	74	19	146	0.65	54%	0	282
SPP	1	5	0	72	0.63	72%	0	78
TRE	4	10	12	42	0.19	81%	0	68
WECC	726	0	0	1111	2.38	54%	2	1839
TOTAL	**835**	**109**	**37**	**1770**	**0.96**	**56%**	**13**	**2764**

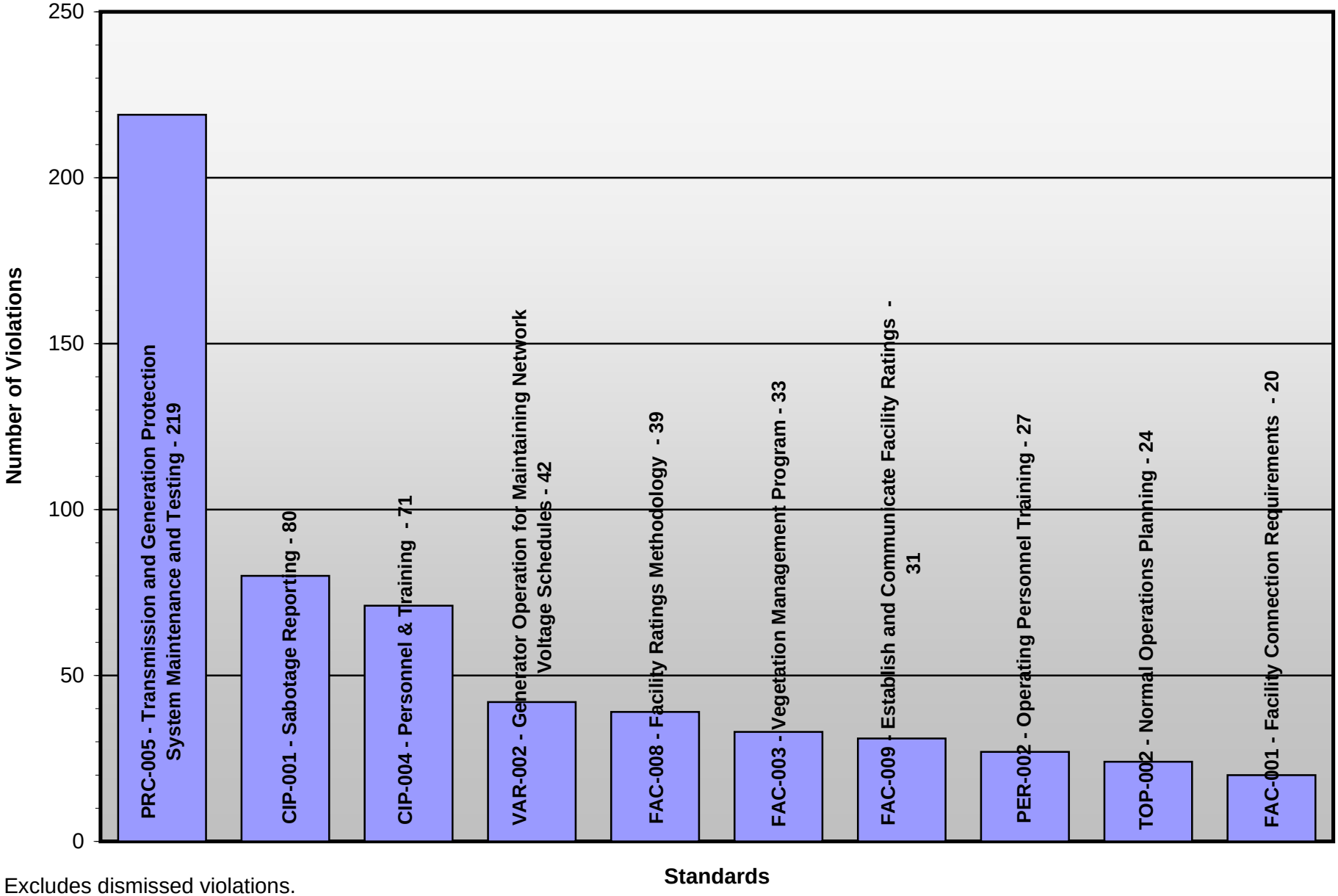
Includes new violations received through 5/31/2009.

Report Date: 6/1/2009

ATTACHENT 6

Item F

Top 10 FERC Enforceable Standards
(Submit Dates: 6/1/2008 thru 5/31/2009)



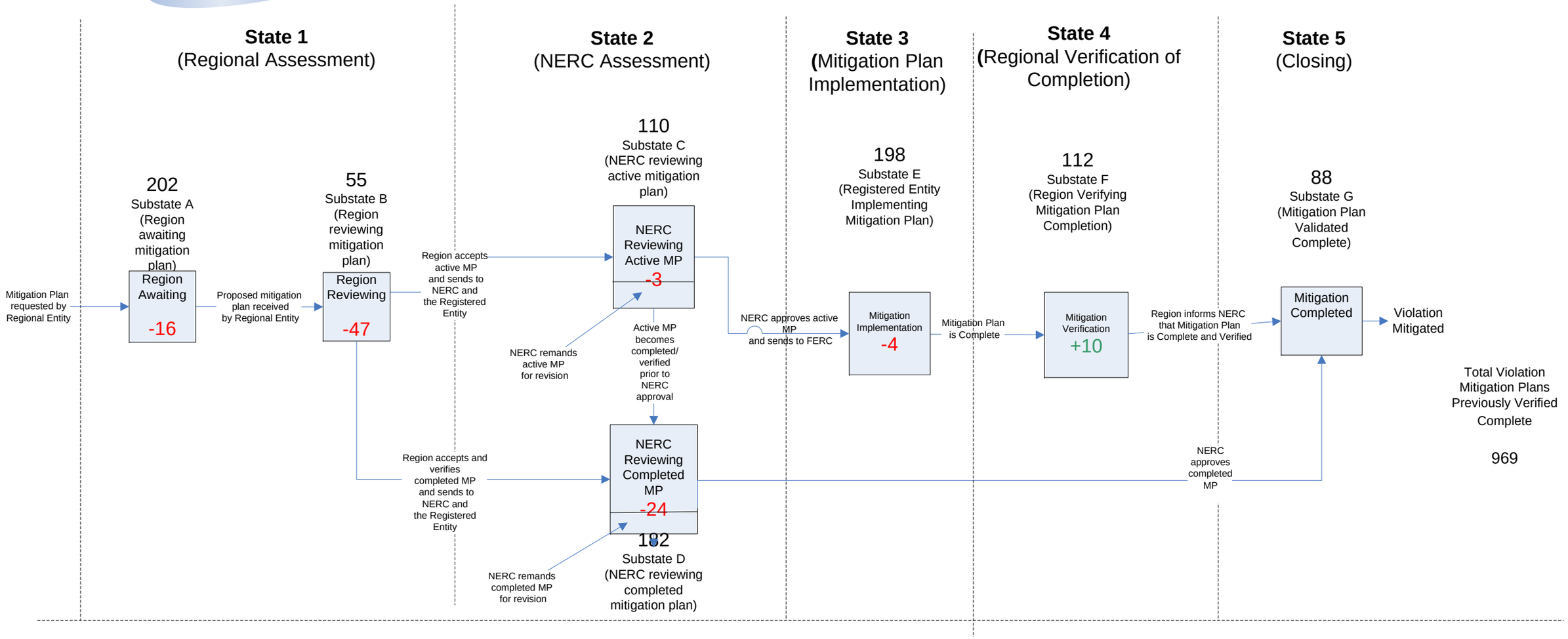
Excludes dismissed violations.

Report Date: 6/1/2009

ATTACHENT 6

Mitigation Process States and Underlying Process Substates

Snapshot comparison between May 1, 2009 and May 31, 2009



Mitigation Plans Process State Table — Active FERC Enforceable Alleged Violations

Below is a breakdown, as of May 31, 2009, of the Compliance Monitoring and Enforcement Program (CMEP) Mitigation Plan "state" summary for the 947 active violations.

	State 1		State 2			State 3	State 4	State 5	
	(Regional Assessment)		(NERC Assessment)			(Mitigation Plan Implementation)	(Regional Verification of Completion)	(Closing)	
	Substate A	Substate B	Substate C		Substate D	Substate E	Substate F	Substate G	
Region	Region Awaiting	Region Reviewing	Accepted MP Not Received from Region	NERC Reviewing Active MP	NERC Reviewing Completed MP	Registered Entity Implementation	Regional Verification of MP Completion	Mitigation Plan Validated Complete	**Total**
FRCC	17	1	2	7	3	33	14	15	**92**
MRO	17	0	0	0	1	4	1	0	**23**
NCEA	3	0	0	0	0	0	0	0	**3**
NPCC	0	19	0	12	1	1	0	0	**33**
RFC	32	0	0	6	0	7	55	0	**100**
SERC	38	2	0	1	2	13	0	12	**68**
SPP	11	0	0	0	0	31	0	4	**46**
TRE	19	0	0	2	0	5	1	8	**35**
WECC	65	33	0	80	175	104	41	49	**547**
TOTAL	**202**	**55**	**2**	**108**	**182**	**198**	**112**	**88**	**947**
State Totals	**257**		**292**			**198**	**112**	**88**	

Definitions
Substate A = Region is still awaiting receipt of mitigation plan from Registered Entity.
Substate B = Region has received mitigation plan and is reviewing.
Substate C = NERC has received mitigation plan and is reviewing. Also includes any mitigation plans not yet received by NERC.
Substate D = Mitigation plan has been verified completed by the Region but is still awaiting approval by NERC.
Substate E = Mitigation plan has been approved by NERC, and sent to FERC, but has not been completed.
Substate F = Mitigation Plan has been completed per Registered Entity but is being verified by the Region.
Substate G = Mitigation plan has been verified completed by Region, has been approved by NERC, and sent to FERC.

- Includes Mitigation Plans received through 5/31/2009.
- Mitigation information reported at the violation level.

Report Date: 6/1/2009

Mitigation Plan Summary of Pre-June 18th Violations

Below is a breakdown of the remaining unmitigated pre-June 18th violations occurring between January 2006 and June 17, 2007, by Region, updated as of May 31, 2009.

	2006 Unmitigated			2007 Unmitigated			All Years	
	Alleged	Target Date Passed	Total 2006	Alleged	Target Date Passed	Total 2007	Total Unmitigated	Under Verification
FRCC	0	0	0	0	0	1	**1**	**10***
MRO	0	0	0	0	0	0	**0**	**0**
NPCC	0	0	0	0	0	0	**0**	**0**
RFC	0	0	0	0	0	0	**0**	**0**
SERC	0	0	0	0	0	1	**1**	**0**
SPP	0	0	0	0	0	0	**0**	**0**
TRE	0	0	0	0	0	0	**0**	**0**
WECC	0	0	0	1	21	31	**31**	**5**
TOTAL	**0**	**0**	**0**	**1**	**21**	**33**	**33**	**15**

Definitions

Target Date Passed = Violations that are listed as "In Progress" or "To be determined" per the region's linear spreadsheet that have an Estimated Mitigation Completion Date which has passed.

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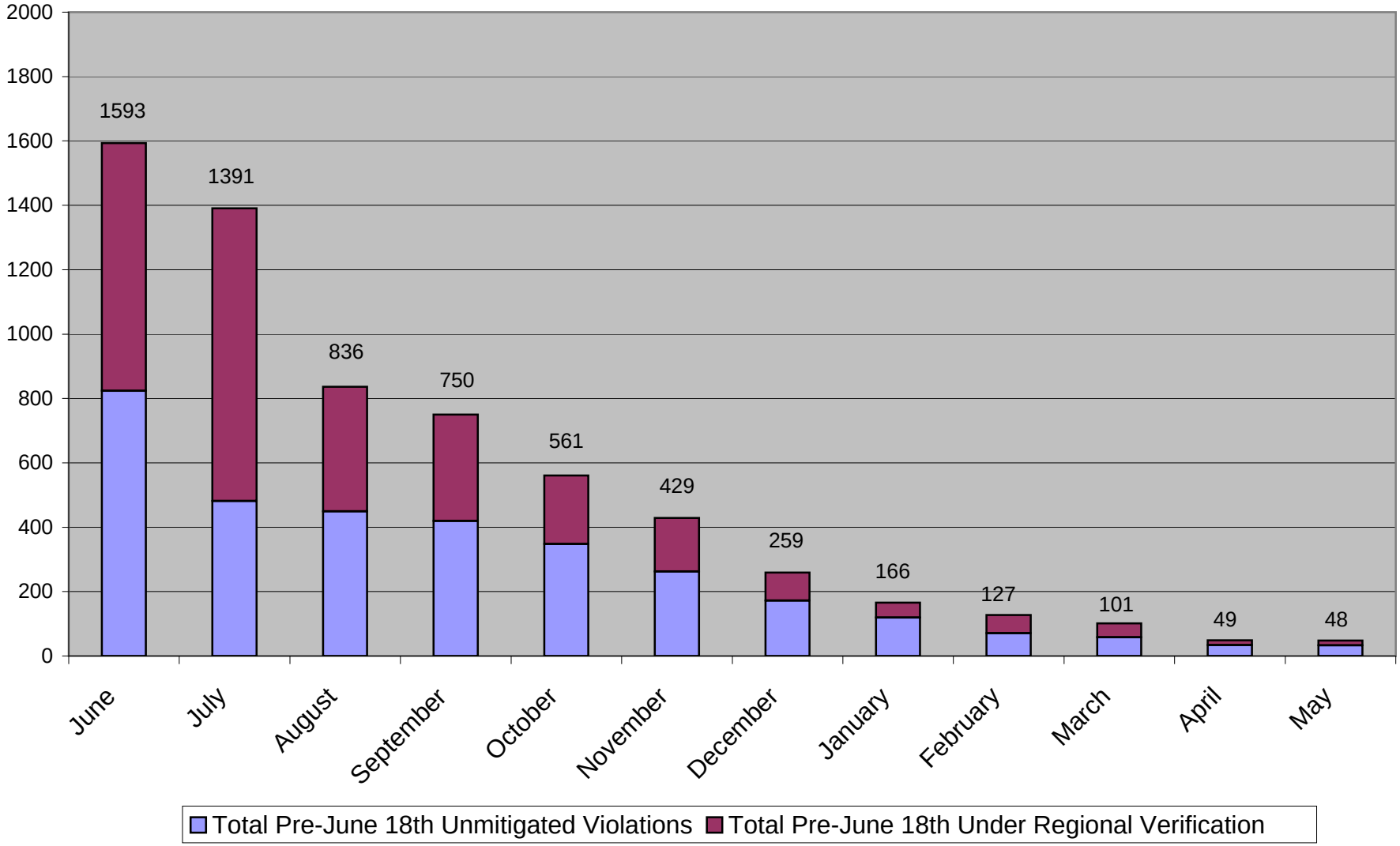
*Includes a 2006 violation that is under review by FRCC.

Report Date: 6/1/2009

Progress with Pre-June 18th Violation Mitigation Plans