

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL MABEE,

Plaintiff,

V.

Civil Action No. 19-3448 (FYP)

FEDERAL ENERGY REGULATORY
COMMISSION,

Defendant.

PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56, Plaintiff Michael Mabee (“Mabee”) cross-moves for summary judgment on Defendant’s withholding of responsive records. In support of his Cross-Motion for Summary Judgment, Plaintiff attaches the Plaintiff’s Memorandum of Points and Authorities in Opposition to Defendant’s Motion for Summary Judgment and in Support of Plaintiff’s Cross-Motion for Summary Judgment, Plaintiff’s Statement of Facts and Response to Defendant’s Statement of Facts, the Declaration of Michael Mabee, Declaration of Christopher Robert Vickery, Declaration of Tyson Slocum, Declaration of Thomas J. Waller Jr., Declaration of George R. Cotter, Declaration of Joseph M. Weiss, and a Proposed Order.

Dated: This 13th day of June 2022.

Respectfully Submitted,

/s/ C. Peter Sorenson

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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
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MICHAEL MABEE,

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FEDERAL ENERGY REGULATORY
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[PROPOSED] ORDER

UPON CONSIDERATION of Defendant's Motion for Summary Judgment [ECF No. 41] and Plaintiff's Cross-Motion for Summary Judgment [filed herein] and the entire record herein;

It is:

ORDERED that Plaintiff's Motion is GRANTED; and it is

FURTHER ORDERED that Defendant's Motion is DENIED.

Date

Florence Y. Pan
United States District Court Judge

- CMEP: Compliance Monitoring and Enforcement Program. NERC's self-regulation plan.
- Docket: Refers to a specific FERC docket number. Each Notice of Penalty (NOP) is assigned a FERC docket number.
- ERO: Electric Reliability Organization.
- FERC: Federal Energy Regulatory Commission is an independent federal agency that regulates the interstate transmission of electricity, natural gas, and oil. FERC's specific authority over the electric grid is to "oversee the reliability of the bulk power system."
- FFT: Find, Fix, Track. An alternative to a "Notice of Penalty" enforcement implemented by NERC for lesser violations. FFTs do not carry a penalty.
- Mitigation: (Note: I have been unable to find an official FERC or NERC definition. Here is the FEMA Definition.) "Mitigation means the process of systematically evaluating the nature and extent of vulnerability to the effects of natural hazards present in society and planning and carrying out actions to minimize future vulnerability to those hazards to the greatest extent practicable." 44 CFR 300.1(c). "Hazard mitigation means any sustained action taken to reduce or eliminate the long-term risk to human life and property from hazards." 44 CFR 201.2.
- "'Mitigating Activities' means actions taken by a Registered Entity to correct and prevent recurrence of a noncompliance, whether or not the actions are embodied in a Mitigation Plan." (Definition from NERC Appendix 2 To the Rules of Procedure, Effective: January 19, 2021.)

- “‘Mitigation Plan’ means an action plan developed by the Registered Entity to (1) correct a violation of a Reliability Standard and (2) prevent re-occurrence of the violation.” (Definition from NERC Appendix 2 To the Rules of Procedure, Effective: January 19, 2021.)
- NCV: Notice of Confirmed Violation.
- NERC: North American Electric Reliability Corporation is a not-for-profit corporation that acts as the self-regulatory organization “whose mission is to assure the reliability of the bulk power system (BPS) in North America.”
- NOP: Notice of penalty.
- Regional Entity: There are 6 “regional entities” which have been delegated authority by NERC to, among other things, conduct enforcement activities and compliance audits. The regional entities are: MRO (Midwest Reliability Organization), NPCC (Northeast Power Coordinating Council), RF (ReliabilityFirst), SERC (SERC Reliability Corporation), TRE or Texas RE (Texas Reliability Entity) and WECC (Western Electric Coordinating Council).
- SNOP: Spreadsheet Notice of Penalty. An alternative to a “Notice of Penalty” enforcement implemented by NERC for lesser violations. SNOPs may or may not carry a penalty.
- TFE: Technical Feasibility Exception.
- URE: Unidentified Registered Entity - a company subject to NERC jurisdiction (registered with NERC); the NERC/FERC euphemism for an entity whose name was not disclosed to the public.

My Background

3. I am a member of the Secure the Grid Coalition, a not-for-profit group of policy, energy, and national security experts, legislators, and industry insiders who are dedicated to strengthening the resilience and security of America's electrical grid.
4. I have experience working as an urban paramedic, a suburban police officer and in the federal civil service. I have served in two wartime deployments with the U.S. Army, the first as a Platoon Sergeant in Operations Desert Shield, Desert Storm and Provide Comfort in 1990-1991. The second was as a brigade level Command Sergeant Major in 2004-2005 as part of Operation Iraqi Freedom.
5. I have studied and written about grid security and emergency preparedness issues for over a decade. I have been quoted on electric grid security issues in *The Wall Street Journal*, *The Washington Post*, *E&E News*, *Industrial Cyber*, *Law360*, *The Washington Examiner* and many other publications. On February 28, 2022, I appeared on 60 Minutes in a report titled: "How secure is America's electric grid?" (Available at: <https://michaelmabee.info/60-minutes-how-secure-is-americas-electric-grid/>.)
6. I have participated in numerous federal dockets, rulemakings and other activities with agencies such as the Federal Energy Regulatory Commission (FERC), the Department of Energy (DOE), and the Department of Homeland Security (DHS), as well as state and federal legislatures.
7. I have been a speaker at over a dozen emergency management conferences, as well as for groups such as the FBI's InfraGard, the International Association of Emergency Managers, and the national Community Emergency Response Team

(CERT) conference. I am also the author of "The Civil Defense Book: emergency preparedness for a rural or suburban community." The first edition of this book was published on July 4, 2013, and the second edition was published on October 17, 2017. These books were published by Amazon and are available in most bookstores online. Over 7,000 copies of my books have been sold. I have given away over 3,000 copies at my own expense to raise public awareness.

8. Prior to this judicial review, I have had two decades of experience processing FOIA requests for the federal government, so I have training and experience applying FOIA exemptions and the national policy that provides: "The Freedom of Information Act should be administered with a clear presumption: In the face of doubt, openness prevails." (See Presidential Memorandum of January 21, 2009, concerning the Freedom of Information Act, 74 Fed. Reg. 4683; and Attorney General Holder's Memorandum for Heads of Executive Departments and Agencies Concerning the Freedom of Information Act, 74 Fed. Reg. 51879 (Oct. 8, 2009).)

Brief Statement of the Issue

9. My requests seek the release of the names of regulatory violators of mandatory "Critical Infrastructure Protection" (CIP) standards which have been systematically and permanently withheld from the public, state regulators, investors, and Congress since 2010.
10. The Defendant in this case is the Federal Energy Regulatory Commission (FERC), which is the federal agency in possession of the records at issue. FERC oversees, among other things, the self-regulatory system for the part of the electric grid known as the "Bulk Power System" (BPS) pursuant to section 215 of the Federal

Power Act. Mandatory reliability standards, including Critical Infrastructure Protection (CIP) standards, are developed and enforced by a FERC designated “Electric Reliability Organization” (ERO), which is subject to FERC’s oversight. FERC also has the authority to approve all ERO actions, to order the ERO to carry out its responsibilities under these statutory provisions, and to independently enforce Reliability Standards. Since July 20, 2006, the North American Electric Reliability Corporation (NERC) has been the federally designated ERO subject to FERC’s oversight. See 116 FERC ¶ 61,062.

11. Beginning in July of 2010, FERC began allowing the permanent withholding from the public the identities of violators of CIP standards. When approving a “Notice of Penalty,” submitted by NERC, FERC has allowed the violators to be designated “Unidentified Registered Entity(s)” rather than publishing the actual names of the companies.
12. FERC withholds the names of the violators despite having assurances from both the violator and from NERC that the vulnerability for which they were fined has already been mitigated. For example, in Docket NP18-14-000, NERC notes: “URE certified that it had completed its Mitigation Plan, and WECC verified that URE had completed all mitigation activities.” See Exhibit 116, PDF page 7 (NOP page 6).
13. FERC’s continued withholding of the names of regulatory violators under a federally mandated enforcement regime thwarts the ability of the public, Congress, investors, and state regulatory authorities to scrutinize the enforcement regime to determine if it is effective. Moreover, there is evidence that ratepayers are forced to

unknowingly pay the CIP violators' regulatory fines either officially through "cost recovery" or unofficially at the discretion of the violator, yet the existence and magnitude of these costs are being hidden from the public.

14. Currently, and since 2010, NERC releases a cursory description of each violation in the Notice of Penalty along with the status of the mitigation, but not the name of the company involved. FERC allows NERC to withhold the names of these regulatory violators. See Exhibits 113-116 for examples.
15. I am unaware of any other government agency that does not release the name of the violating entity particularly once a penalty has been set and agreed upon. As discussed further below, many agencies issue press releases that name violators when they take enforcement actions.

History of Self-Regulatory System in Electric Grid

16. The North American electric grid is comprised of over 3,000 companies, both in the public and private sectors, that operate in an interconnected system to facilitate the generation, transmission, and distribution of electrical power.
17. The bulk power system – the transmission portion of the electric grid – consists of approximately 1,500 entities operating at 100 kilovolts or higher, self-regulated by NERC, which is overseen by FERC. However, the bulk power system does not include power generation or distribution to end-users.
18. The current self-regulatory regime was developed after the enactment on August 8, 2005 of the Energy Policy Act of 2005, which resulted from Congressional concern following the Great Northeast Blackout of 2003. The current regulatory scheme

uses NERC as the industry's "self-regulator," also known as the Electric Reliability Organization or "ERO."

Notices of Penalty

19. NERC submits "Notices of Penalty" (NOP) to FERC for violations of mandatory reliability standards. A subset of the mandatory reliability standards is known as "Critical Infrastructure Protection" (CIP) standards. CIP standards cover both physical security and cyber security. (See <https://www.nerc.com/pa/Stand/Pages/CIPStandards.aspx>)
20. A Notice of Penalty may arise from an audit conducted by NERC and its Regional Entities or may result from a self-report of a violation by a regulated entity. The resolution of a penalty may be a settlement agreement (as in the majority of cases) or a Notice of Confirmed Violation (NCV). FERC has the authority to review a Notice of Penalty. See 16 U.S. Code § 824o(e)(2).
21. After reviewing each of the 253 dockets that are the subject of this judicial review, I found that on each docket, FERC issued a "Notice of No Further Review" showing that the Notice of Penalty is final. (See Exhibit 102, column titled: "Notice of No Further Review Issued.")
22. FERC does not have the authority to write reliability standards for the electric grid. FERC does have the authority to direct NERC to write a reliability standard for the bulk power system and FERC must ultimately approve reliability standards submitted by NERC. (See 16 U.S. Code § 824o(d) and 18 C.F.R. § 39.7(e).)
23. Between June 2008 and June 2010, NERC included the name of the entity (the electric utility company) in all reliability standards' Notices of Penalty, including

those for CIP violations, which were submitted to FERC and made available to the public on NERC's website as well as in FERC's public dockets. Between June 2008 and June 2010, NERC publicly released the names of 261 CIP standards violators on their website as well as in public filings with FERC. Exhibit 101 is a listing of these named CIP violators, derived from NERC data.

24. Starting on July 10, 2010, NERC began withholding most of the names of regulatory violators of CIP standards both on their website and in public filings with FERC. NERC continued to release the names of entities violating "non-CIP" reliability standards, such as "Transmission Vegetation Management."
25. Between July 2010 and November 2013, NERC released less than 6% of the names of violators. (See Exhibit 101.)
26. Since November 27, 2013, NERC has released no names of CIP standard violators in its public filings with FERC or on its website. Exhibit 102 is a listing of these "Unidentified Registered Entities" derived from NERC data.
27. In all, between July 2010 and July of 2019 – the period covered by my three FOIA requests at issue in this judicial review – NERC withheld the names of the regulator violators in 253 FERC "Notice of Penalty" dockets. In total, I believe that the 253 dockets represent 1,490 total entity names that were withheld from the public by NERC when the Notices of Penalty were submitted to FERC. This population also covers 3,614 violations of CIP standards. I compiled a listing of these violations from NERC's data, which is attached as Exhibit 102.

28. NERC asserts that it is reasonable to release the salient, at times generalized, facts of each violation, as it does, so long as the company name is not included, as releasing the name is asserted to be somehow dangerous. (Kuehnle Decl. at 4.)
29. NERC initially used Notices of Penalty as the primary enforcement tool, but more recently instituted “Spreadsheet Notices of Penalty” (SNOPs), “Find, Fix, Track” (FFT), and “Compliance Exceptions” (CEs). In NERC’s 2021 “Compliance Monitoring and Enforcement Program Annual Report,” NERC states:
- “Approximately 85 percent of all noncompliance processed in 2021 was processed via the CE and FFT disposition methods, which require no settlement agreement and have no penalties associated with them. This was a decrease from 2020, which saw approximately 91 percent of all noncompliance processed via the CE and FFT disposition methods. This change is a result of an increased percentage of SNOPs and full NOPs filed in 2021 compared with 2020.” (See NERC’s 2021 “Compliance Monitoring and Enforcement Program Annual Report, page 25, available at: <https://www.nerc.com/pa/comp/CE/ReportsDL/2021%20CMEP%20Annual%20Report.pdf>.)
30. There is no penalty associated with FFT and CE dispositions. There is often no penalty associated with a SNOP. Some of the dockets subject to this judicial review are FFTs and SNOPs.
31. Also, in NERC’s 2021 “Compliance Monitoring and Enforcement Program Annual Report,” NERC stated:
- “For all REs [Regional Entities], 100 percent of mitigation for noncompliance discovered in 2015 or before has been reported as complete. Registered entities have made significant progress in mitigating older noncompliance from 2016-2018, with nearly 98.3 percent or more of noncompliance discovered in those years having been mitigated.” (See NERC’s 2021 “Compliance Monitoring and Enforcement Program Annual Report, page 25, available at: <https://www.nerc.com/pa/comp/CE/ReportsDL/2021%20CMEP%20Annual%20Report.pdf>.)

32. On June 4, 2008, NERC started submitting “Notices of Penalty” to FERC for violations of mandatory reliability standards, including CIP standards. (See NERC Searchable Spreadsheet, available at: <https://www.nerc.com/pa/comp/CE/Pages/Enforcement-and-Mitigation.aspx>.)
33. The public versions of the Notices of Penalty of CIP violations here at issue *do not* provide information that would assist an attacker, even if the attacker knew the name of the “Unidentified Registered Entity.” I know this both from my research in this area, and from witnessing other enforcement agencies, including the Nuclear Regulatory Commission, routinely releasing names of violators in conjunction with violations of their regulations and standards.

The FOIA Requests Subject to this Judicial Review

34. My three FOIA requests, as amended and accepted by FERC, cover a total of 253 FERC “Notice of Penalty” dockets representing 1,490 total entity names that were withheld from the public by NERC when the Notices of Penalty were submitted to FERC. The three FOIA requests were given FERC tracking numbers: FOIA No. FY19-19 (also referred to in some correspondence as FOIA No. 2019-0019), FOIA No. FY19-30 (also referred to in some correspondence as FOIA No. 2019-0030), and FOIA FY19-99 (also referred to in some correspondence as FOIA No. 2019-0099). See Exhibits 103, 104 and 105.
35. I originally requested the “‘NERC Full Notice of Penalty’ version which includes the name of the registered entity (and which has been previously withheld from the public)” for all 253 dockets covered by my requests. However, on March 21, 2019,

at the request of FERC's staff, I agreed that FERC could provide page 1 of the public version of the "Notice of Penalty" with the docket number and name of the "Unidentified Registered Entity(s)" inserted on the top of the page. See Exhibit 106.

36. Before I authorized the filing of this judicial review on November 15, 2019, FERC had only processed an average of 1.9 dockets per month. It would have taken 11 years to process 253 dockets at the rate of 1.9 per month.
37. After I caused this judicial review to be filed with the Court on November 15, 2019, and the Court issued its January 28, 2020 Minute Order, FERC began to process 11.4 dockets per month and finished production in January of 2022.
38. Of the 1,490 "Unidentified Registered Entity" names requested in my three amended requests, FERC released 141 "Unidentified Registered Entity" names. FERC denied the release of 1,349 "Unidentified Registered Entity" names.
39. My three requests pertinent to this judicial review request records with the names of all "Unidentified Registered Entities" in 253 Notice of Penalty dockets filed with FERC between July 2010 and July of 2019. Thus, all Notices of Penalty in this judicial review were processed by FERC between 3 to 12 years ago. There are no on-going law enforcement activities. Finally, in 252 of the 253 dockets, the violations were verified as mitigated by the regulator before the Notice of Penalty was submitted to FERC.
40. FERC has issued a "Notice of No Further Review" on all 253 Notice of Penalty dockets associated with this judicial review, finalizing the Notices of Penalty as a matter of law. For example, FERC's common practice is to state in its notice:

“Take notice that the Commission will not further review, on its own motion, the following Notices of Penalty...” See, for example, Exhibit 113 at PDF page 6.

41. According to NERC’s documents, all violations associated with 252 of the 253 dockets in this judicial review have been mitigated. For violations which occurred after February of 2013, NERC published a “Mitigation Completion Date” in its public records (See Exhibit 102). For the cases prior to February of 2013, the mitigation completion date is included in the Notice of Penalty. For example, in the Notice of Penalty for NP10-160-000 (Exhibit 113), NERC states on PDF page 3:

“Information also is provided regarding the dates of a Registered Entity’s certification of completion of its Mitigation Plan and Regional Entity verification of such completion. As evidence of completion of its Mitigation Plan, each Registered Entity, or WECC RC in the case of the NCEA-processed violations, submitted a signed, formal document and procedure assigning and identifying a senior manager by name, title, business address and date of designation as required.”

42. The one possible exception to this completed mitigation is Docket NP19-4-000. I don’t know if the violations associated with Docket NP19-4-000 have been mitigated as that information is no longer available to the public. However, on August 29, 2019, FERC issued a “Notice of No Further Review” making the NOP final as a matter of law. See 18 CFR § 39.7(e).

Instances Where Non-CIP Violations Were Mixed with CIP Violations

43. In several instances, NERC has included violations of other non-CIP reliability standards as well as CIP violations in the Notices of Penalty, causing the names of non-CIP violators to be withheld from the public. The names of non-CIP violators are normally released in the public versions of Notices of Penalty. Examples

relevant to this judicial review are NP11-1-000, NP11-128-000, NP11-137-000 and NP12-20-000 in which violations of standard FAC-003-1 (Transmission Vegetation Management) were included with CIP violations and the names of the violators withheld from the public.

44. My review of docket NP11-137 reveals that NERC filed the Notice of Penalty on March 30, 2011. The Unidentified Registered Entity agreed in a settlement agreement to pay a \$106,000 fine for several CIP and non-CIP violations, including FAC003-1 (Transmission Vegetation Management). According to NERC, the Unidentified Registered Entity completed its mitigation plans for all violations and the Regional Entity certified that all mitigation plans have been completed. (Notice of Penalty available on FERC's website, accession number 20110330-5118.) On April 29, 2011, FERC issued a "No Further Review" letter. Thus, over 11 years ago, FERC accepted the Notice of Penalty and NERC's representations about the mitigation of the violations. On May 27, 2020, FERC denied my request to release the name associated with Docket NP11-137-000.
45. My review of docket NP11-128-000 reveals that NERC filed the Notice of Penalty on February 23, 2011. The Unidentified Registered Entity agreed in a settlement agreement to pay a \$450,000 fine for several CIP and non-CIP violations, including FAC003-1 (Transmission Vegetation Management). According to NERC, the Unidentified Registered Entity completed its mitigation plans for all violations and the Regional Entity certified that all mitigation plans have been completed. (Notice of Penalty available on FERC's website, accession number 20110224-5027). On March 25, 2011, FERC issued a "No Further Review" letter. Thus, over 11 years

ago, FERC accepted the Notice of Penalty and NERC's representations about the mitigation of the violations. On April 28, 2020, FERC denied my request to release the name associated with Docket NP11-128-000.

46. My review of docket NP12-20-000 reveals that NERC filed the Notice of Penalty on March 30, 2012. The Unidentified Registered Entity agreed in a settlement agreement to pay a \$60,000 fine for several CIP and non-CIP violations, including FAC003-1 (Transmission Vegetation Management). According to NERC, the Unidentified Registered Entity completed its mitigation plans for all violations and the Regional Entity certified that all mitigation plans have been completed. (Notice of Penalty available on FERC's website, accession number 20120330-5237). On April 27, 2012, FERC issued a "No Further Review" letter. Thus, over 10 years ago, FERC accepted the Notice of Penalty and NERC's representations about the mitigation of the violations. On November 25, 2020, FERC denied my request to release the name associated with Docket NP12-20-000. This docket will be discussed more fully below as FERC released the violator's name to one FOIA requester but denied releasing it to me.
47. My review of docket NP11-1-000 reveals that NERC filed the Notice of Penalty on October 7, 2010. The Unidentified Registered Entity agreed in a settlement agreement to pay a \$106,000 fine for several CIP and non-CIP violations, including FAC003-1 (Transmission Vegetation Management). According to NERC, the Unidentified Registered Entity completed its mitigation plans for all violations and the Regional Entity certified that all mitigation plans have been completed. (Notice of Penalty available on FERC's website, accession number 20101007-5160.) On

November 5, 2010, FERC issued a "No Further Review " letter. Thus, over 11 years ago, FERC accepted the Notice of Penalty and NERC's representations about the mitigation of the violations. On January 20, 2021, FERC denied my request to release the name associated with Docket NP11-1-000. This docket will be discussed more fully below as FERC released the violator's name to one FOIA requester but denied releasing it to me.

48. Since each of the four Notices of Penalty discussed above were submitted over 5 years ago, any CEII assertion by NERC has expired and there is no evidence in FERC's public docket that NERC has applied for redesignation. FERC's regulations at 18 CFR § 388.113(e)(1) provide that the designation of Critical Energy/Electric Infrastructure Information (CEII) "may last for up to a five-year period, unless re-designated."

Instances Where FERC Denied My Request, But Released the Same Information Elsewhere

49. I have identified at least five dockets in this judicial review where FERC denied releasing the name of the CIP violator to me but released the name to another FOIA requester or in a public order: Dockets No. NP11-1-000, No. NP12-20-000, No. NP18-7-000, No. NP11-59-000 and No. NP12-9-000. I will describe each below.
50. On November 25, 2020, FERC denied my request to release the name associated with Docket NP12-20-000, citing FOIA Exemptions 3 and 7(F). (Exhibit 109.) This docket was part of my January 12, 2019 FOIA request no. 2019-0030. However, on September 19, 2019, FERC granted a FOIA request by the

Foundation for Resilient Societies and released the name associated with Docket NP12-20-000 pursuant to that FOIA. (Exhibit 107.) The inconsistent treatment of my request and that of the Foundation for Resilient Societies calls into question FERCs stated analysis of CEII and of the danger of releasing these names.

51. On January 29, 2021, FERC denied my request to release the name associated with Docket NP11-1-000, citing FOIA Exemptions 3 and 7(F). (Exhibit 108.) This docket was part of my January 12, 2019 FOIA request no. 2019-0030. However, on September 19, 2019, FERC granted a FOIA request by the Foundation for Resilient Societies and released the name associated with Docket NP11-1-000. (Exhibit 107.) The inconsistent treatment of my request and that of the Foundation for Resilient Societies calls into question FERC's stated analysis of CEII and of the danger of releasing these names.
52. On February 26, 2021, FERC denied my request to release the name associated with Docket NP18-7-000, citing FOIA Exemptions 3 and 7(F). (Exhibit 119.) This docket was part of my December 18, 2018 FOIA request no. 2019-0019. However, FERC had previously released the name of the entity to me on August 28, 2018 in a separate FOIA request unrelated to this judicial review. (Exhibit 110.) The inconsistent treatment of my two FOIA requests calls into question FERC's stated analysis of CEII and of the danger of releasing these names.
53. On December 22, 2010, NERC filed a Notice of Penalty in Docket No. NP11-59-000 against an "Unidentified Registered Entity." The Notice of Penalty found that the "Unidentified Registered Entity" had violated a cybersecurity standard, CIP-004-1, and was assessed a \$7,000 penalty. The "Unidentified Registered Entity"

petitioned FERC to recover the cost of the penalties from its ratepayers (FERC Docket ER11-2798-000). On May 6, 2011, FERC publicly identified the “Unidentified Registered Entity” cited in Docket No. NP11-59-000 in conjunction with the cost recovery request. (Exhibit 120.) On March 30, 2020, FERC denied my request to release the name associated with Docket NP11-59-000 – a name which it previously released in a public order on May 6, 2011. (Exhibit 111.) The inconsistency between the denial of my request on the one hand and FERC’s disclosure of the same information in a public docket on the other hand calls into question FERC’s stated analysis of CEII and the supposed danger of releasing these names.

54. On December 30, 2011, NERC filed a Notice of Penalty in Docket No. NP12-9-000 against an “Unidentified Registered Entity.” The Notice of Penalty found that the “Unidentified Registered Entity” had violated a cybersecurity standard, CIP-004-1, and was assessed a \$60,000 penalty. On February 16, 2012, Midwest Independent Transmission System Operator, Inc. (MISO), admitting publicly that it was the “Unidentified Registered Entity” in NP12-9-000, petitioned FERC to recover the cost of the penalties from its ratepayers (FERC Docket ER12-1112-000) See (Exhibit 121 at 1.) On April 16, 2012, FERC publicly approved the cost recovery request. (Exhibit 121 at 2.) Thus, the identity of the “Unidentified Registered Entity” was made publicly available in FERC’s public filings, yet on September 25, 2020, FERC denied my request to release the name associated with Docket NP12-9-000. This docket was part of my January 12, 2019 FOIA request no. 2019-0030. (Exhibit 112.) The inconsistency between the denial of my request

on the one hand and FERC's disclosure of the same information in a public docket on the other calls into question FERC's stated analysis of CEII and the supposed danger of releasing these names.

55. I have found four FERC orders in which FERC approved requests by the CIP violators to pass CIP violation penalties on to their customers: FERC Docket ER11-2798-000, FERC Docket ER12-1112-000, FERC Docket ER15-764-000 and FERC Docket ER19-2362-000. In each instance, the identity of the violator was withheld from the public when the Notice of Penalty was issued. In each instance, a separate docket was opened with a "public notice" in the Federal Register which in none of the four cases gave the public adequate information to determine if they were impacted. And in each case, FERC approved the penalty being passed on to the public. As noted above, at least two of these cases involve my FOIA requests which were denied by FERC and subject to this judicial review (ER12-1112-000 and ER11-2798-000). The inconsistency between the denial of my requests and FERC's public release of the same information elsewhere calls into question FERC's stated analysis of CEII and the supposed danger of releasing these names.

Examples of NOPs That Should Be Disclosed

56. My FOIA requests cover 1,490 "Unidentified Registered Entity" names. These are all either publicly owned or privately owned electrical power companies or entities. FERC has disclosed 141 names and denied 1,349. Rather than wasting the Court's time making 1,349 separate arguments, I will use four examples below to illustrate that the names of "Unidentified Registered Entities" of mitigated violations, which

have been approved by FERC, do not qualify for protection from disclosure under FOIA Exemptions 3 or 7(F).

57. Attached are Exhibits 113-116 which each contain: 1) Excerpts from the public Notice of Penalty with relevant passages highlighted, 2) the FERC “No Further Review” notice, and 3) the FERC FOIA denial letter for each of the respective four dockets: NP10-160-000, NP10-135-000, NP18-7-000 and NP18-14-000. In all four of these dockets, Defendant denied my FOIA request. The first is a “lower risk” violation. The second is a “medium risk” violation, the third is a “serious risk” violation and the fourth is “Minimal/Moderate Risk.” In all four, the “violations” have been mitigated for years and revealing the name of the violator could not put any person or property at risk.
58. For brevity, Exhibits 113-116 contain excerpts of the public Notices of Penalty. However, the expert witnesses reviewed the full and complete version of the Notices of Penalty represented by these exhibits. The full public Notice of Penalties for these four dockets are available on FERC’s website (<https://elibrary.ferc.gov/eLibrary/search>) by searching using either the docket numbers or the Accession Numbers: NP10-160-000: Accession Number 20100913-5034; NP10-135-000: Accession Number 20100706-5172; NP18-7-000: Accession Number 20180228-5108; and NP18-14-000: Accession Number 20180531-5251.
59. My position on the facts is supported by three respected cybersecurity experts (see declarations of Joseph Wiess, George Cotter, and Christopher Vickery) and one Critical Infrastructure Security expert (see declaration of Tommy Waller) who will provide their independent analysis of these four examples. Also, the declaration of

Tyson Slocum, director of Public Citizen's Energy Program, further supports my position that FERC is not properly applying the exemptions to FOIA.

Docket NP10-160-000 (Spreadsheet NOP – Risk: Lower)

60. On September 13, 2010, NERC filed a Spreadsheet Notice of Penalty with FERC describing two violations by an “Unidentified Registered Entity” which resulted in no monetary penalty. The two violations were administrative in nature and described as follows (Exhibit 113):

Violation 1: CIP-007-1, Requirement 1. Description of Violation: “URE did not have test procedures for two Critical Cyber Assets, URE's Energy Control Center and Backup Energy Control Center. URE's test methodology did not outline baseline production and development parameters and URE could not demonstrate that its testing procedure minimized adverse effects on URE's production system or its operations. URE did not document that it conducted its testing in a manner that reflected URE's production environment and URE did not document all test results.” Moreover, “The violation was self-reported, it was a documentation issue, it was the first violation of this Reliability Standard incurred by URE and it did not constitute a serious or substantial risk to the bulk power system.”

- Violation Start date: July 1, 2008.
- Violation End Date: October 15, 2009.
- Regional Entity Verification of Mitigation Plan Completion: November 11, 2009.

Violation 2: CIP-003-1, Requirement 1. Description of Violation: “URE’s Cyber Security Policy did not address all the requirements in Standards CIP-002 through CIP-009.” Moreover, “The violation was self-reported, it was the first violation of this Reliability Standard incurred by URE and it did not constitute a serious or substantial risk to the bulk power system.”

- Violation Start date: July 1, 2008.
 - Violation End Date: October 16, 2009.
 - Regional Entity Verification of Mitigation Plan Completion: November 11, 2009.
61. FERC issued a “No Further Review” Order on Docket NP10-160-000 on October 13, 2009.
62. On January 29, 2021, FERC refused to release the name of the “Unidentified Registered Entity” associated with docket NP10-160-000 whose two minor administrative violations have been mitigated for over 11 years. (Exhibit 113.)

Docket NP10-135-000 (NOP – Risk: Medium)

63. On July 6, 2010, NERC filed a Notice of Penalty with FERC in Docket NP10-135-000. There was one violation cited with an \$8,000 penalty agreed upon in a settlement agreement between the Regional Entity and the “Unidentified Registered Entity.” The entirety of the description is as follows:

Violation: CIP-005-1, Requirement 2. Description of Violation: “The Registered Entity’s unrestricted firewall access on the first connection to the Electronic Security Perimeter did not follow an access control model that denied access by default. The Registered Entity’s direct outside connection on the second connection was a failure to only enable ports within the Electronic Security Perimeter.”

“The Registered Entity mitigated this violation by correcting: (i) the rule set on the firewall for the two outbound circuits at issue; and (ii) the cabling error that connected the Critical Cyber Asset servers to an outbound node. Actions taken included reconnecting these two circuits through a proper Electronic Security Perimeter border firewall and configuring the necessary firewall rule sets to appropriately restrict access.”

64. FERC issued a “no further review” letter on August 5, 2010 accepting the NOP and closing the case. On January 29, 2021, FERC refused to release the name of this “Unidentified Registered Entity” whose violation had been mitigated for over 11 years. (Exhibit 114.)

Docket NP18-7-000 (PG&E NOP – Risk: Serious)

65. On February 28, 2018, NERC Filed Notice of Penalty in Docket NP18-7-000 with FERC. The “Unidentified Registered Entity” agreed in a settlement to pay a \$2.7 million dollar penalty. The mitigation was completed on December 15, 2017. FERC Issued a “No Further review” letter on May 30, 2018. Yet on February 26, 2021, Defendant denied my request under FOIA to disclose the name of the “Unidentified Registered Entity.” (Exhibit 115.)
66. The cybersecurity expert who discovered the data breach in 2016 that led to this Notice of Penalty was Christopher Robert Vickery. Mr. Vickery’s declaration is attached, as well as his professional assessment that there would be no danger in releasing the name of the “Unidentified Registered Entity” associated with FERC docket NP18-7-000. (See Declaration of Vickery.)

Docket NP18-14-000 (NOP – Risk: Minimal/Moderate)

67. On May 31, 2018, NERC filed a Notice of Penalty in FERC docket NP18-14-000. The Notice of Penalty covered 22 violations of the Critical Infrastructure Protection (CIP) NERC Reliability Standards. According to NERC, the mitigation was completed by October 31, 2017 and the Regional Entity (ReliabilityFirst) verified that all mitigation actions were completed. See Exhibit 116, pages 6-23: Each violation has the entry: “URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.” The Unidentified Registered Entity entered a settlement agreement and agreed to pay \$180,000. FERC issued a “No Further review” letter on June 29, 2018. On February 26, 2021, Defendant denied my request under FOIA to disclose the name of the “Unidentified Registered Entity” – over three years after the violations had been mitigated. (Exhibit 116.)

Other Federal Agencies Release the Names of Regulatory Violators

68. The Nuclear Regulatory Commission (NRC) oversees, among other things, nuclear power generation plants. These nuclear generation plants are part of the electric grid. The NRC routinely publishes the names of regulatory violators. For example, see Exhibits 117 and 118. Specifically, in Exhibit 117, the NRC cited Holtec Decommissioning International, LLC for a physical security related violation at the Oyster Creek Nuclear Generating Station. The NRC named the violator and the location, yet FERC has withheld the identities of NERC CIP physical security

violators in 3 dockets related to this judicial review: NP17-29-000, NP18-14-000 and NP19-4-000.

69. In addition to the NRC, here are some other agencies that name the names of regulatory violators:

- The Department of Justice (DOJ) issues press releases about their enforcement actions, including cyber security cases. See <https://www.justice.gov/news>.
- The Federal Aviation Administration (FAA) issues press releases about their enforcement actions. It is notable that the aviation industry was central to the 9/11/2001 terrorist attack on the United States. See <https://www.faa.gov/newsroom>.
- The Occupational Safety and Health Administration (OSHA) publicizes penalties issued to companies via press releases and a database. See: <https://www.osha.gov/news/newsreleases/enforcement/> and <https://www.osha.gov/pls/imis/establishment.html>.
- The Securities and Exchange Commission (SEC) issues press releases about their enforcement actions. See <https://www.sec.gov/page/news>.
- The Food and Drug Administration (FDA) issues press releases about their enforcement actions. See <https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/criminal-investigations/press-releases>.

Exhibits To Declaration

70. I have used several exhibits to illustrate the facts at issue in this judicial review.

The following are the exhibits I have referred to above:

- Exhibit 101 is a listing of the CIP violators whose names were disclosed to the public.
I extracted this list from NERC's "Searchable Spreadsheet" of NOPs, available at:
<https://www.nerc.com/pa/comp/CE/Pages/Enforcement-and-Mitigation.aspx> (Note: NERC did not begin to include the "Mitigation Completion Date" on the spreadsheet until February of 2013. Prior to that, the "Mitigation Completion Date" is available in the Notices of Penalty.)
- Exhibit 102 is a listing of the "Unidentified registered Entities" covered in this judicial review. I extracted this list from NERC's "Searchable Spreadsheet" of NOPs, available at: <https://www.nerc.com/pa/comp/CE/Pages/Enforcement-and-Mitigation.aspx> (Note: NERC did not begin to include the "Mitigation Completion Date" on the spreadsheet until February of 2013. Prior to that, the "Mitigation Completion Date" is available in the Notices of Penalty.)
- Exhibit 103 - Plaintiff's December 18, 2018 FOIA Request and January 4, 2019 amendment.
- Exhibit 104 - Plaintiff's January 12, 2019 FOIA Request.
- Exhibit 105 - Plaintiff's August 3, 2019 FOIA Request.
- Exhibit 106 - The March 21, 2019 agreement between Defendant and Plaintiff.
- Exhibit 107 - FERC's September 19, 2019 determination letter to Foundation for Resilient Societies.
- Exhibit 108 - FERC's January 29, 2021 denial letter.
- Exhibit 109 - FERC's February 26, 2021 denial letter.

- Exhibit 110 - FERC's August 2, 2018 release letter.
- Exhibit 111 - FERC's March 30, 2020 denial letter.
- Exhibit 112 - FERC's September 25, 2020 denial letter.
- Exhibit 113 - Excerpts from NP10-160-000 NOP, FERC No Further Review Letter & FOIA denial letter.
- Exhibit 114 – Excerpts from NP10-135-000 NOP, FERC No Further Review Letter & FOIA denial letter.
- Exhibit 115 – Excerpts from NP18-7-000 NOP, FERC No Further Review Letter & FOIA denial letter.
- Exhibit 116 – Excerpts from NP18-14-000 NOP, FERC No Further Review Letter & FOIA denial letter.
- Exhibit 117 – NRC letter dated January 26, 2022.
- Exhibit 118 – NRC Letter dated November 18, 1997.
- Exhibit 119 – February 26, 2021 FERC determination letter in FOIA 2019-30
- Exhibit 120 – FERC Order 135 FERC ¶ 61,118
- Exhibit 121 – FERC Order 139 FERC ¶ 61,038 & Page 1 of MISO Petition

Pursuant to 28 U.S.C. § 1746, I hereby affirm under penalty of perjury that the foregoing declaration is true and correct.

Executed this 4th day of June, 2022

A handwritten signature in blue ink, appearing to read 'mabe', is positioned above a horizontal line.

Michael Mabee
Plaintiff

Exhibit 101

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

Exhibit 101 is a listing of the CIP violators whose names were disclosed to the public. I extracted this list from NERC's "Searchable Spreadsheet" of NOPs, available at:
<https://www.nerc.com/pa/comp/CE/Pages/Enforcement-and-Mitigation.aspx>

(Note: NERC did not begin to include the "Mitigation Completion Date" on the spreadsheet until February of 2013. Prior to that, the "Mitigation Completion Date" is available in the Notices of Penalty.)

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|---|--|---|-------------------|----------------------|-----|---|--|----------------------------|------------------------------------|
| 6/4/2008 | NP08-11-000 | NPCC | The City of Holyoke Gas and Electric Dept. | NCR07217 | \$0 | NPCC200700011 | CIP-001-1 | 1 | Medium | | | X |
| 6/4/2008 | NP08-11-000 | NPCC | The City of Holyoke Gas and Electric Dept. | NCR07217 | \$0 | NPCC200700012 | CIP-001-1 | 2 | Medium | | | X |
| 6/4/2008 | NP08-11-000 | NPCC | The City of Holyoke Gas and Electric Dept. | NCR07217 | \$0 | NPCC200700013 | CIP-001-1 | 3 | Medium | | | X |
| 6/4/2008 | NP08-11-000 | NPCC | The City of Holyoke Gas and Electric Dept. | NCR07217 | \$0 | NPCC200700014 | CIP-001-1 | 4 | Medium | | | X |
| 6/4/2008 | NP08-12-000 | Texas RE | Suez Energy Marketing NA Inc | NCR04129 | \$0 | TRE200700011 | CIP-001-1 | 1 | Medium | | | X |
| 6/4/2008 | NP08-12-000 | Texas RE | Suez Energy Marketing NA Inc | NCR04129 | \$0 | TRE200700012 | CIP-001-1 | 2 | Medium | | | X |
| 6/4/2008 | NP08-12-000 | Texas RE | Suez Energy Marketing NA Inc | NCR04129 | \$0 | TRE200700013 | CIP-001-1 | 3 | Medium | | | X |
| 6/4/2008 | NP08-12-000 | Texas RE | Suez Energy Marketing NA Inc | NCR04129 | \$0 | TRE200700014 | CIP-001-1 | 4 | Medium | | | X |
| 6/4/2008 | NP08-13-000 | NPCC | Norwich Public Utilities | NCR07038 | \$0 | NPCC200700019 | CIP-001-1 | 1 | Medium | | | X |
| 6/4/2008 | NP08-13-000 | NPCC | Norwich Public Utilities | NCR07038 | \$0 | NPCC200700020 | CIP-001-1 | 2 | Medium | | | X |
| 6/4/2008 | NP08-13-000 | NPCC | Norwich Public Utilities | NCR07038 | \$0 | NPCC200700021 | CIP-001-1 | 3 | Medium | | | X |
| 6/4/2008 | NP08-13-000 | NPCC | Norwich Public Utilities | NCR07038 | \$0 | NPCC200700022 | CIP-001-1 | 4 | Medium | | | X |
| 6/4/2008 | NP08-15-000 | SERC | Illinois Municipal Electric Agency | NCR00795 | \$0 | SERC200700058 | CIP-001-1 | 1 | Medium | | | X |
| 6/4/2008 | NP08-15-000 | SERC | Illinois Municipal Electric Agency | NCR00795 | \$0 | SERC200700059 | CIP-001-1 | 2 | Medium | | | X |
| 6/4/2008 | NP08-15-000 | SERC | Illinois Municipal Electric Agency | NCR00795 | \$0 | SERC200700060 | CIP-001-1 | 3 | Medium | | | X |
| 6/4/2008 | NP08-15-000 | SERC | Illinois Municipal Electric Agency | NCR00795 | \$0 | SERC200700061 | CIP-001-1 | 4 | Medium | | | X |
| 6/4/2008 | NP08-16-000 | MRO | Northern States Power | NCR01020 | \$0 | MRO200700004 | CIP-001-1 | 2 | Medium | | | X |
| 6/4/2008 | NP08-17-000 | SERC | East Texas Electric Cooperative, Inc. | NCR01227 | \$0 | SERC200700031 | CIP-001-1 | 1 | Medium | | | X |
| 6/4/2008 | NP08-17-000 | SERC | East Texas Electric Cooperative, Inc. | NCR01227 | \$0 | SERC200700032 | CIP-001-1 | 2 | Medium | | | X |
| 6/4/2008 | NP08-17-000 | SERC | East Texas Electric Cooperative, Inc. | NCR01227 | \$0 | SERC200700033 | CIP-001-1 | 3 | Medium | | | X |
| 6/4/2008 | NP08-17-000 | SERC | East Texas Electric Cooperative, Inc. | NCR01227 | \$0 | SERC200700034 | CIP-001-1 | 4 | Medium | | | X |
| 6/4/2008 | NP08-18-000 | Texas RE | Topaz Power Management LP (QSE) | NCR04147 | \$0 | TRE200800028 | CIP-001-1 | 1 | Medium | | | X |
| 6/4/2008 | NP08-8-000 | NPCC | Peabody Municipal Light Plant | NCR07191 | \$0 | NPCC200700015 | CIP-001-1 | 1 | Medium | | | X |
| 6/4/2008 | NP08-8-000 | NPCC | Peabody Municipal Light Plant | NCR07191 | \$0 | NPCC200700016 | CIP-001-1 | 2 | Medium | | | X |
| 6/4/2008 | NP08-8-000 | NPCC | Peabody Municipal Light Plant | NCR07191 | \$0 | NPCC200700017 | CIP-001-1 | 3 | Medium | | | X |
| 6/4/2008 | NP08-8-000 | NPCC | Peabody Municipal Light Plant | NCR07191 | \$0 | NPCC200700018 | CIP-001-1 | 4 | Medium | | | X |
| 6/4/2008 | NP08-9-000 | SPP RE | Southwestern Public Service Co. (SPS-XCEL) | NCR01145 | \$0 | SPP200700006 | CIP-001-1 | 2 | Medium | | | X |
| 6/5/2008 | NP08-19-000 | SERC | West Georgia Generating Company, LLC | NCR01368 | \$0 | SERC200700065 | CIP-001-1 | 4 | Medium | | | X |
| 6/5/2008 | NP08-20-000 | SERC | Doyle I, LLC | NCR01216 | \$0 | SERC200700012 | CIP-001-1 | 4 | Medium | | | X |
| 6/5/2008 | NP08-22-000 | SERC | Sam Rayburn G&T Electric Cooperative, Inc. | NCR01307 | \$0 | SERC200700027 | CIP-001-1 | 1 | Medium | | | X |
| 6/5/2008 | NP08-22-000 | SERC | Sam Rayburn G&T Electric Cooperative, Inc. | NCR01307 | \$0 | SERC200700028 | CIP-001-1 | 2 | Medium | | | X |
| 6/5/2008 | NP08-22-000 | SERC | Sam Rayburn G&T Electric Cooperative, Inc. | NCR01307 | \$0 | SERC200700029 | CIP-001-1 | 3 | Medium | | | X |
| 6/5/2008 | NP08-22-000 | SERC | Sam Rayburn G&T Electric Cooperative, Inc. | NCR01307 | \$0 | SERC200700030 | CIP-001-1 | 4 | Medium | | | X |
| 6/5/2008 | NP08-24-000 | SERC | Mt. Carmel Public Utility Co. | NCR01277 | \$0 | SERC200700062 | CIP-001-1 | 4 | Medium | | | X |
| 6/5/2008 | NP08-25-000 | SERC | Tex-LA Electric Coop of Texas, Inc. | NCR01342 | \$0 | SERC200700035 | CIP-001-1 | 1 | Medium | | | X |
| 6/5/2008 | NP08-25-000 | SERC | Tex-LA Electric Coop of Texas, Inc. | NCR01342 | \$0 | SERC200700036 | CIP-001-1 | 2 | Medium | | | X |
| 6/5/2008 | NP08-25-000 | SERC | Tex-LA Electric Coop of Texas, Inc. | NCR01342 | \$0 | SERC200700037 | CIP-001-1 | 3 | Medium | | | X |
| 6/5/2008 | NP08-25-000 | SERC | Tex-LA Electric Coop of Texas, Inc. | NCR01342 | \$0 | SERC200700038 | CIP-001-1 | 4 | Medium | | | X |
| 6/5/2008 | NP08-28-000 | SERC | N.C. Power Holdings, Inc. - Elizabethtown Power | NCR08084 | \$0 | SERC200700074 | CIP-001-1 | 1 | Medium | | | X |
| 6/5/2008 | NP08-28-000 | SERC | N.C. Power Holdings, Inc. - Elizabethtown Power | NCR08084 | \$0 | SERC200700075 | CIP-001-1 | 2 | Medium | | | X |
| 6/5/2008 | NP08-28-000 | SERC | N.C. Power Holdings, Inc. - Elizabethtown Power | NCR08084 | \$0 | SERC200700076 | CIP-001-1 | 3 | Medium | | | X |
| 6/5/2008 | NP08-28-000 | SERC | N.C. Power Holdings, Inc. - Elizabethtown Power | NCR08084 | \$0 | SERC200700077 | CIP-001-1 | 4 | Medium | | | X |
| 6/5/2008 | NP08-30-000 | SERC | City of Orangeburg Dept. of Public Utilities | NCR01202 | \$0 | SERC200700054 | CIP-001-1 | 1 | Medium | | | X |
| 6/5/2008 | NP08-30-000 | SERC | City of Orangeburg Dept. of Public Utilities | NCR01202 | \$0 | SERC200700055 | CIP-001-1 | 2 | Medium | | | X |
| 6/5/2008 | NP08-30-000 | SERC | City of Orangeburg Dept. of Public Utilities | NCR01202 | \$0 | SERC200700056 | CIP-001-1 | 3 | Medium | | | X |
| 6/5/2008 | NP08-30-000 | SERC | City of Orangeburg Dept. of Public Utilities | NCR01202 | \$0 | SERC200700057 | CIP-001-1 | 4 | Medium | | | X |
| 6/5/2008 | NP08-31-000 | SERC | N.C. Power Holdings, Inc. - Lumberton Power | NCR08085 | \$0 | SERC200700079 | CIP-001-1 | 1 | Medium | | | X |
| 6/5/2008 | NP08-31-000 | SERC | N.C. Power Holdings, Inc. - Lumberton Power | NCR08085 | \$0 | SERC200700080 | CIP-001-1 | 2 | Medium | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|---|--|---|-------------------|----------------------|-----|---|--|----------------------------|------------------------------------|
| 6/5/2008 | NP08-31-000 | SERC | N.C. Power Holdings, Inc. - Lumberton Power | NCR08085 | \$0 | SERC200700081 | CIP-001-1 | 3 | Medium | | | X |
| 6/5/2008 | NP08-31-000 | SERC | N.C. Power Holdings, Inc. - Lumberton Power | NCR08085 | \$0 | SERC200700082 | CIP-001-1 | 4 | Medium | | | X |
| 3/31/2009 | NP09-17-000 | SERC | FPL Energy, LLC | NCR01243 | \$250,000 | SERC200810007 | CIP-001-1 | 1 | Medium | | | X |
| 3/31/2009 | NP09-17-000 | SERC | FPL Energy, LLC | NCR01243 | \$250,000 | SERC200810008 | CIP-001-1 | 2 | Medium | | | X |
| 5/4/2009 | NP09-22-000 | MRO | Escanaba Municipal Electric Authority | NCR00982 | \$0 | MRO200700023 | CIP-001-1 | 1 | Medium | | | X |
| 5/4/2009 | NP09-22-000 | MRO | Escanaba Municipal Electric Authority | NCR00982 | \$0 | MRO200700024 | CIP-001-1 | 2 | Medium | | | X |
| 5/4/2009 | NP09-22-000 | MRO | Escanaba Municipal Electric Authority | NCR00982 | \$0 | MRO200700025 | CIP-001-1 | 3 | Medium | | | X |
| 5/4/2009 | NP09-22-000 | MRO | Escanaba Municipal Electric Authority | NCR00982 | \$0 | MRO200700026 | CIP-001-1 | 4 | Medium | | | X |
| 5/4/2009 | NP09-23-000 | MRO | NorthWestern Energy | NCR01021 | \$0 | MRO200700027 | CIP-001-1 | 1 | Medium | | | X |
| 5/4/2009 | NP09-23-000 | MRO | NorthWestern Energy | NCR01021 | \$0 | MRO200700028 | CIP-001-1 | 2 | Medium | | | X |
| 5/4/2009 | NP09-23-000 | MRO | NorthWestern Energy | NCR01021 | \$0 | MRO200700029 | CIP-001-1 | 3 | Medium | | | X |
| 5/4/2009 | NP09-23-000 | MRO | NorthWestern Energy | NCR01021 | \$0 | MRO200700030 | CIP-001-1 | 4 | Medium | | | X |
| 7/10/2009 | NP09-30-000 | Texas RE | BTU QSE Services Inc. | NCR04024 | \$5,000 | TRE200800030 | CIP-001-1 | 1 | Medium | | | X |
| 7/10/2009 | NP09-30-000 | Texas RE | BTU QSE Services Inc. | NCR04024 | \$5,000 | TRE200800031 | CIP-001-1 | 3 | Medium | | | X |
| 7/10/2009 | NP09-32-000 | SPP RE | Eastman Cogeneration Limited Partnership | NCR01092 | \$0 | SPP200700018 | CIP-001-1 | 1 | Medium | | | X |
| 7/10/2009 | NP09-32-000 | SPP RE | Eastman Cogeneration Limited Partnership | NCR01092 | \$0 | SPP200700019 | CIP-001-1 | 4 | Medium | | | X |
| 7/31/2009 | NP09-34-000 | NPCC | Ashburnham Municipal Light Plant | NCR07010 | \$0 | NPCC200800023 | CIP-001-1 | 1 | Medium | | | X |
| 7/31/2009 | NP09-34-000 | NPCC | Ashburnham Municipal Light Plant | NCR07010 | \$0 | NPCC200800024 | CIP-001-1 | 2 | Medium | | | X |
| 7/31/2009 | NP09-34-000 | NPCC | Ashburnham Municipal Light Plant | NCR07010 | \$0 | NPCC200800025 | CIP-001-1 | 3 | Medium | | | X |
| 7/31/2009 | NP09-34-000 | NPCC | Ashburnham Municipal Light Plant | NCR07010 | \$0 | NPCC200800026 | CIP-001-1 | 4 | Medium | | | X |
| 9/25/2009 | NP09-46-000 | WECC | Truckee Donner Public Utility District | NCR05433 | \$3,000 | WECC200801227 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Alameda Municipal Power | NCR10042 | \$0 | WECC200801048 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Alameda Municipal Power | NCR10042 | \$0 | WECC200801049 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Alameda Municipal Power | NCR10042 | \$0 | WECC200801050 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Alameda Municipal Power | NCR10042 | \$0 | WECC200801051 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Central Lincoln People's Utility District | NCR05062 | \$0 | WECC200810225 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | FRCC | City of Bartow | NCR00003 | \$0 | FRCC200800052 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | FRCC | City of Bartow | NCR00003 | \$0 | FRCC200800053 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | FRCC | City of Bartow | NCR00003 | \$0 | FRCC200800054 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | FRCC | City of Bartow | NCR00003 | \$0 | FRCC200800055 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Healdsburg | NCR05491 | \$0 | WECC200700453 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Healdsburg | NCR05491 | \$0 | WECC200700454 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Healdsburg | NCR05491 | \$0 | WECC200700455 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Healdsburg | NCR05491 | \$0 | WECC200700456 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Pasadena Water and Power | NCR05090 | \$0 | WECC200801590 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Pasadena Water and Power | NCR05090 | \$0 | WECC200801591 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Pasadena Water and Power | NCR05090 | \$0 | WECC200801592 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Pasadena Water and Power | NCR05090 | \$0 | WECC200801593 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Roseville | NCR05094 | \$0 | WECC200700631 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Roseville | NCR05094 | \$0 | WECC200700632 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Roseville | NCR05094 | \$0 | WECC200700633 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Roseville | NCR05094 | \$0 | WECC200700634 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Shasta Lake | NCR05095 | \$0 | WECC200801052 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Shasta Lake | NCR05095 | \$0 | WECC200801053 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Shasta Lake | NCR05095 | \$0 | WECC200801054 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Shasta Lake | NCR05095 | \$0 | WECC200801055 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Ukiah | NCR05494 | \$0 | WECC200800622 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Ukiah | NCR05494 | \$0 | WECC200800623 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Ukiah | NCR05494 | \$0 | WECC200800624 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | City of Ukiah | NCR05494 | \$0 | WECC200800661 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Clatskanie People's Utility District | NCR05100 | \$0 | WECC200801178 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Clatskanie People's Utility District | NCR05100 | \$0 | WECC200801179 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Clatskanie People's Utility District | NCR05100 | \$0 | WECC200801180 | CIP-001-1 | 3 | Medium | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--|--|---|-------------------|----------------------|-----|---|--|----------------------------|------------------------------------|
| 10/14/2009 | NP10-2-000 | WECC | Clatskanie People's Utility District | NCR05100 | \$0 | WECC200801181 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | RF | Cloverland Electric Cooperative | NCR00724 | \$0 | RFC200700008 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | RF | Cloverland Electric Cooperative | NCR00724 | \$0 | RFC200700010 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | RF | Cloverland Electric Cooperative | NCR00724 | \$0 | RFC200700011 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | RF | Cloverland Electric Cooperative | NCR00724 | \$0 | RFC200700012 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Colorado River Commission of Nevada | NCR05105 | \$0 | WECC200700307 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Colorado River Commission of Nevada | NCR05105 | \$0 | WECC200700308 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Colorado River Commission of Nevada | NCR05105 | \$0 | WECC200700309 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Colorado River Commission of Nevada | NCR05105 | \$0 | WECC200700310 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Coos-Curry Electric Cooperative, Inc. | NCR05116 | \$0 | WECC200810377 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Cowlitz County PUD No. 1 | NCR05123 | \$0 | WECC200810255 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Deseret Generation & Transmission Co-operative | NCR05127 | \$0 | WECC200710053 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Elmhurst Mutual Power & Light Company | NCR05144 | \$0 | WECC200700196 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Elmhurst Mutual Power & Light Company | NCR05144 | \$0 | WECC200700197 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Elmhurst Mutual Power & Light Company | NCR05144 | \$0 | WECC200700198 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Elmhurst Mutual Power & Light Company | NCR05144 | \$0 | WECC200700199 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Emerald People's Utility District | NCR05146 | \$0 | WECC200700200 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Emerald People's Utility District | NCR05146 | \$0 | WECC200801585 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Emerald People's Utility District | NCR05146 | \$0 | WECC200801586 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Emerald People's Utility District | NCR05146 | \$0 | WECC200801587 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | FRCC | Florida Public Utilities Company | NCR00025 | \$0 | FRCC200800097 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | FRCC | Florida Public Utilities Company | NCR00025 | \$0 | FRCC200800098 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | FRCC | Florida Public Utilities Company | NCR00025 | \$0 | FRCC200800099 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | FRCC | Florida Public Utilities Company | NCR00025 | \$0 | FRCC200800100 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Grays Harbor County PUD | NCR05172 | \$0 | WECC200700042 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Grays Harbor County PUD | NCR05172 | \$0 | WECC200700043 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Grays Harbor County PUD | NCR05172 | \$0 | WECC200700044 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Grays Harbor County PUD | NCR05172 | \$0 | WECC200700045 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | FRCC | Hardee Power Partners Limited | NCR00035 | \$0 | FRCC200800056 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Hetch Hetchy Water and Power | NCR05182 | \$0 | WECC200810199 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Hetch Hetchy Water and Power | NCR05182 | \$0 | WECC200810202 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | High Desert Power Project, LLC | NCR05184 | \$0 | WECC200801564 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | High Desert Power Project, LLC | NCR05184 | \$0 | WECC200801565 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | High Desert Power Project, LLC | NCR05184 | \$0 | WECC200801566 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | High Desert Power Project, LLC | NCR05184 | \$0 | WECC200801567 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | RF | Illinois Municipal Electric Agency | NCR00795 | \$0 | RFC200700038 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | RF | Illinois Municipal Electric Agency | NCR00795 | \$0 | RFC200700039 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | RF | Illinois Municipal Electric Agency | NCR00795 | \$0 | RFC200700040 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | RF | Illinois Municipal Electric Agency | NCR00795 | \$0 | RFC200700041 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Incorporated County of Los Alamos (LAC) | NCR05196 | \$0 | WECC200810275 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Incorporated County of Los Alamos (LAC) | NCR05196 | \$0 | WECC200810276 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Incorporated County of Los Alamos (LAC) | NCR05196 | \$0 | WECC200810277 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Incorporated County of Los Alamos (LAC) | NCR05196 | \$0 | WECC200810278 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Kings River Conservation District | NCR05505 | \$0 | WECC200801144 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Lassen Municipal Utility District | NCR05216 | \$0 | WECC200801568 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Mason County PUD No. 3 | NCR05233 | \$0 | WECC200700082 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Mason County PUD No. 3 | NCR05233 | \$0 | WECC200700083 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Mason County PUD No. 3 | NCR05233 | \$0 | WECC200700084 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Mason County PUD No. 3 | NCR05233 | \$0 | WECC200700085 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Missoula Electric Cooperative, Inc. | NCR05242 | \$0 | WECC200700319 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Missoula Electric Cooperative, Inc. | NCR05242 | \$0 | WECC200700320 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Missoula Electric Cooperative, Inc. | NCR05242 | \$0 | WECC200700321 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Missoula Electric Cooperative, Inc. | NCR05242 | \$0 | WECC200700322 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Navopache Electric Cooperative, Inc. | NCR05260 | \$0 | WECC200800772 | CIP-001-1 | 1 | Medium | | | X |

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|-------------|---------------|-----------------|---|--|---|-------------------|----------------------|-----|---|--|----------------------------|------------------------------------|
| 10/14/2009 | NP10-2-000 | WECC | Navopache Electric Cooperative, Inc. | NCR05260 | \$0 | WECC200800773 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Navopache Electric Cooperative, Inc. | NCR05260 | \$0 | WECC200800774 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Navopache Electric Cooperative, Inc. | NCR05260 | \$0 | WECC200800775 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | FRCC | New Hope Power Partnership | NCR00051 | \$0 | FRCC200700025 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | FRCC | New Hope Power Partnership | NCR00051 | \$0 | FRCC200700066 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | FRCC | New Hope Power Partnership | NCR00051 | \$0 | FRCC200700067 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | FRCC | New Hope Power Partnership | NCR00051 | \$0 | FRCC200700068 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Northern Wasco County People's Utility District | NCR05280 | \$0 | WECC200710168 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Northern Wasco County People's Utility District | NCR05280 | \$0 | WECC200710169 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Northern Wasco County People's Utility District | NCR05280 | \$0 | WECC200710171 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Northern Wasco County People's Utility District | NCR05280 | \$0 | WECC200710173 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Parkland Light and Water Company | NCR05314 | \$0 | WECC200810297 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Parkland Light and Water Company | NCR05314 | \$0 | WECC200810298 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Parkland Light and Water Company | NCR05314 | \$0 | WECC200810299 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Peninsula Light Company, Inc. | NCR05316 | \$0 | WECC200700344 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Peninsula Light Company, Inc. | NCR05316 | \$0 | WECC200700345 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Peninsula Light Company, Inc. | NCR05316 | \$0 | WECC200700346 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Peninsula Light Company, Inc. | NCR05316 | \$0 | WECC200700347 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Port of Oakland | NCR05324 | \$0 | WECC200700515 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Port of Oakland | NCR05324 | \$0 | WECC200700516 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Port of Oakland | NCR05324 | \$0 | WECC200700517 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Port of Oakland | NCR05324 | \$0 | WECC200700518 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Public Service Company of Colorado | NCR05521 | \$0 | WECC200700395 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Public Utility District No. 1 of Benton County | NCR05337 | \$0 | WECC200700032 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Public Utility District No. 1 of Benton County | NCR05337 | \$0 | WECC200700033 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Public Utility District No. 1 of Benton County | NCR05337 | \$0 | WECC200700034 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Public Utility District No. 1 of Benton County | NCR05337 | \$0 | WECC200700035 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Rosebud Operating Services, Inc. | NCR05367 | \$0 | WECC200801169 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Rosebud Operating Services, Inc. | NCR05367 | \$0 | WECC200801170 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Sacramento Municipal Utility District | NCR05368 | \$0 | WECC200710010 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Sierra Pacific Industries | NCR05389 | \$0 | WECC200801137 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Sierra Pacific Industries | NCR05389 | \$0 | WECC200801138 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Sierra Pacific Industries | NCR05389 | \$0 | WECC200801139 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Sierra Pacific Industries | NCR05389 | \$0 | WECC200801140 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Springfield Utility Board | NCR05405 | \$0 | WECC200710065 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Tillamook People's Utility District | NCR05427 | \$0 | WECC200700239 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Tillamook People's Utility District | NCR05427 | \$0 | WECC200700240 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Tillamook People's Utility District | NCR05427 | \$0 | WECC200700241 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Tillamook People's Utility District | NCR05427 | \$0 | WECC200700242 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | TransAlta Centralia Generation, LLC | NCR05533 | \$0 | WECC200700507 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | TransAlta Centralia Generation, LLC | NCR05533 | \$0 | WECC200700508 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | TransAlta Centralia Generation, LLC | NCR05533 | \$0 | WECC200700509 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | TransAlta Centralia Generation, LLC | NCR05533 | \$0 | WECC200700510 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Tri-Dam Project of the Oakdale and South Joaquin Irrigation Districts | NCR05431 | \$0 | WECC200801571 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Tri-Dam Project of the Oakdale and South Joaquin Irrigation Districts | NCR05431 | \$0 | WECC200801572 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Tri-Dam Project of the Oakdale and South Joaquin Irrigation Districts | NCR05431 | \$0 | WECC200801573 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Tri-Dam Project of the Oakdale and South Joaquin Irrigation Districts | NCR05431 | \$0 | WECC200801574 | CIP-001-1 | 4 | Medium | | | X |

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|-------------|---------------|-----------------|---|--|---|-------------------|----------------------|-----|---|--|----------------------------|------------------------------------|
| 10/14/2009 | NP10-2-000 | WECC | United Electric Co-op, Inc. | NCR05437 | \$0 | WECC200710172 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | United Electric Co-op, Inc. | NCR05437 | \$0 | WECC200710174 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | United Electric Co-op, Inc. | NCR05437 | \$0 | WECC200710176 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | United Electric Co-op, Inc. | NCR05437 | \$0 | WECC200710178 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Vigilante Electric Cooperative, Inc. | NCR05541 | \$0 | WECC200801580 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Vigilante Electric Cooperative, Inc. | NCR05541 | \$0 | WECC200801581 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Vigilante Electric Cooperative, Inc. | NCR05541 | \$0 | WECC200801582 | CIP-001-1 | 4 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Wells Rural Electric Company | NCR05458 | \$0 | WECC200710114 | CIP-001-1 | 1 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Wells Rural Electric Company | NCR05458 | \$0 | WECC200710116 | CIP-001-1 | 2 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Wells Rural Electric Company | NCR05458 | \$0 | WECC200710117 | CIP-001-1 | 3 | Medium | | | X |
| 10/14/2009 | NP10-2-000 | WECC | Wells Rural Electric Company | NCR05458 | \$0 | WECC200710118 | CIP-001-1 | 4 | Medium | | | X |
| 11/13/2009 | NP10-10-000 | NPCC | AES Cayuga, LLC | NCR07001 | \$10,000 | NPCC200800027 | CIP-001-1 | 1 | Medium | | | X |
| 11/13/2009 | NP10-10-000 | NPCC | AES Cayuga, LLC | NCR07001 | \$10,000 | NPCC200800028 | CIP-001-1 | 2 | Medium | | | X |
| 11/13/2009 | NP10-11-000 | NPCC | AES Greenidge, LLC | NCR07003 | \$10,000 | NPCC200800029 | CIP-001-1 | 1 | Medium | | | X |
| 11/13/2009 | NP10-11-000 | NPCC | AES Greenidge, LLC | NCR07003 | \$10,000 | NPCC200800030 | CIP-001-1 | 2 | Medium | | | X |
| 11/13/2009 | NP10-11-000 | NPCC | AES Greenidge, LLC | NCR07003 | \$10,000 | NPCC200800031 | CIP-001-1 | 3 | Medium | | | X |
| 11/13/2009 | NP10-11-000 | NPCC | AES Greenidge, LLC | NCR07003 | \$10,000 | NPCC200800032 | CIP-001-1 | 4 | Medium | | | X |
| 11/13/2009 | NP10-12-000 | NPCC | AES Somerset, LLC | NCR07004 | \$10,000 | NPCC200800033 | CIP-001-1 | 1 | Medium | | | X |
| 11/13/2009 | NP10-12-000 | NPCC | AES Somerset, LLC | NCR07004 | \$10,000 | NPCC200800034 | CIP-001-1 | 2 | Medium | | | X |
| 11/13/2009 | NP10-13-000 | NPCC | AES Westover, LLC | NCR07005 | \$10,000 | NPCC200800035 | CIP-001-1 | 1 | Medium | | | X |
| 11/13/2009 | NP10-13-000 | NPCC | AES Westover, LLC | NCR07005 | \$10,000 | NPCC200800036 | CIP-001-1 | 2 | Medium | | | X |
| 11/13/2009 | NP10-13-000 | NPCC | AES Westover, LLC | NCR07005 | \$10,000 | NPCC200800037 | CIP-001-1 | 3 | Medium | | | X |
| 11/13/2009 | NP10-13-000 | NPCC | AES Westover, LLC | NCR07005 | \$10,000 | NPCC200800038 | CIP-001-1 | 4 | Medium | | | X |
| 11/13/2009 | NP10-17-000 | WECC | Lincoln County Power District No. 1 | NCR05220 | \$2,000 | WECC200800758 | CIP-001-1 | 4 | Medium | | | X |
| 11/13/2009 | NP10-8-000 | SERC | Union Power Partners, L.P. | NCR0135 | \$10,000 | SERC200800092 | CIP-001-1 | 4 | Medium | | | X |
| 11/13/2009 | NP10-9-000 | SERC | Westmoreland Partners | NCR0137 | \$10,000 | SERC200800109 | CIP-001-1 | 1 | Medium | | | X |
| 12/30/2009 | NP10-28-000 | SERC | Southwestern Electric Cooperative, Inc. | NCR01324 | \$3,000 | SERC200800202 | CIP-001-1 | 4 | Medium | | | X |
| 2/12/2010 | NP10-50-000 | SERC | Henderson Municipal Power & Light | NCR01254 | \$35,000 | SERC200800233 | CIP-001-1 | 1 | Medium | | | X |
| 2/12/2010 | NP10-50-000 | SERC | Henderson Municipal Power & Light | NCR01254 | \$35,000 | SERC200800193 | CIP-001-1 | 3 | Medium | | | X |
| 3/1/2010 | NP10-52-000 | NPCC | Verso Androscoggin LLC | NCR07229 | \$2,500 | NPCC200800059 | CIP-001-1 | 1 | Medium | | | X |
| 3/1/2010 | NP10-52-000 | NPCC | Verso Androscoggin LLC | NCR07229 | \$2,500 | NPCC200800060 | CIP-001-1 | 2 | Medium | | | X |
| 3/1/2010 | NP10-52-000 | NPCC | Verso Androscoggin LLC | NCR07229 | \$2,500 | NPCC200800061 | CIP-001-1 | 4 | Medium | | | X |
| 3/1/2010 | NP10-53-000 | NPCC | Verso Bucksport LLC | NCR10239 | \$2,500 | NPCC200800056 | CIP-001-1 | 1 | Medium | | | X |
| 3/1/2010 | NP10-53-000 | NPCC | Verso Bucksport LLC | NCR10239 | \$2,500 | NPCC200800057 | CIP-001-1 | 2 | Medium | | | X |
| 3/1/2010 | NP10-53-000 | NPCC | Verso Bucksport LLC | NCR10239 | \$2,500 | NPCC200800058 | CIP-001-1 | 4 | Medium | | | X |
| 3/1/2010 | NP10-58-000 | RF | EFS Parlin Holdings LLC | NCR10257 | \$5,000 | RFC200800114 | CIP-001-1 | 2 | Medium | | | X |
| 3/1/2010 | NP10-67-000 | WECC | City of Palo Alto | NCR05089 | \$24,500 | WECC200801107 | CIP-001-1 | 1 | Medium | | | X |
| 3/1/2010 | NP10-67-000 | WECC | City of Palo Alto | NCR05089 | \$24,500 | WECC200801108 | CIP-001-1 | 2 | Medium | | | X |
| 3/1/2010 | NP10-67-000 | WECC | City of Palo Alto | NCR05089 | \$24,500 | WECC200801109 | CIP-001-1 | 3 | Medium | | | X |
| 3/1/2010 | NP10-68-000 | WECC | Energy Northwest - Energy Business Services | NCR00250 | \$3,000 | WECC200801186 | CIP-001-1 | 1 | Medium | | | X |
| 3/1/2010 | NP10-68-000 | WECC | Energy Northwest - Energy Business Services | NCR00250 | \$3,000 | WECC200801187 | CIP-001-1 | 2 | Medium | | | X |
| 3/1/2010 | NP10-68-000 | WECC | Energy Northwest - Energy Business Services | NCR00250 | \$3,000 | WECC200801188 | CIP-001-1 | 3 | Medium | | | X |
| 3/1/2010 | NP10-68-000 | WECC | Energy Northwest - Energy Business Services | NCR00250 | \$3,000 | WECC200801189 | CIP-001-1 | 4 | Medium | | | X |
| 3/31/2010 | NP10-83-000 | SERC | East Kentucky Power Cooperative | NCR01225 | \$7,000 | SERC200800204 | CIP-001-1 | 1 | Medium | | | X |
| 3/31/2010 | NP10-83-000 | SERC | East Kentucky Power Cooperative | NCR01225 | \$7,000 | SERC200800205 | CIP-001-1 | 2 | Medium | | | X |
| 3/31/2010 | NP10-83-000 | SERC | East Kentucky Power Cooperative | NCR01225 | \$7,000 | SERC200800206 | CIP-001-1 | 3 | Medium | | | X |
| 3/31/2010 | NP10-83-000 | SERC | East Kentucky Power Cooperative | NCR01225 | \$7,000 | SERC200800207 | CIP-001-1 | 4 | Medium | | | X |
| 3/31/2010 | NP10-93-000 | WECC | Modesto Irrigation District | NCR05244 | \$0 | WECC200800568 | CIP-001-1 | 1 | Medium | | | X |
| 3/31/2010 | NP10-93-000 | WECC | Modesto Irrigation District | NCR05244 | \$0 | WECC200800569 | CIP-001-1 | 2 | Medium | | | X |
| 3/31/2010 | NP10-93-000 | WECC | Modesto Irrigation District | NCR05244 | \$0 | WECC200800570 | CIP-001-1 | 3 | Medium | | | X |
| 4/28/2010 | NP10-99-000 | RF | Wolverine Power Supply Cooperative, Inc. | NCR00954 | \$15,000 | RFC200900144 | CIP-001-1 | 1 | Medium | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--|--|---|-------------------|----------------------|-----|---|--|----------------------------|------------------------------------|
| 6/2/2010 | NP10-107-000 | WECC | City of Burbank Water and Power | NCR05072 | \$44,500 | WECC200800722 | CIP-001-1 | 1 | Medium | | | X |
| 6/2/2010 | NP10-107-000 | WECC | City of Burbank Water and Power | NCR05072 | \$44,500 | WECC200800723 | CIP-001-1 | 2 | Medium | | | X |
| 6/2/2010 | NP10-107-000 | WECC | City of Burbank Water and Power | NCR05072 | \$44,500 | WECC200800724 | CIP-001-1 | 3 | Medium | | | X |
| 6/2/2010 | NP10-107-000 | WECC | City of Burbank Water and Power | NCR05072 | \$44,500 | WECC200800725 | CIP-001-1 | 4 | Medium | | | X |
| 6/2/2010 | NP10-118-000 | WECC | Public Utility District No. 1 of Whatcom County | NCR05522 | \$20,000 | WECC200710124 | CIP-001-1 | 1 | Medium | | | X |
| 6/2/2010 | NP10-118-000 | WECC | Public Utility District No. 1 of Whatcom County | NCR05522 | \$20,000 | WECC200710125 | CIP-001-1 | 2 | Medium | | | X |
| 6/2/2010 | NP10-118-000 | WECC | Public Utility District No. 1 of Whatcom County | NCR05522 | \$20,000 | WECC200710126 | CIP-001-1 | 3 | Medium | | | X |
| 6/2/2010 | NP10-118-000 | WECC | Public Utility District No. 1 of Whatcom County | NCR05522 | \$20,000 | WECC200710127 | CIP-001-1 | 4 | Medium | | | X |
| 7/6/2010 | NP10-125-000 | RF | Covanta York Renewable Energy, LLC | NCR08064 | \$7,500 | RFC200900131 | CIP-001-1 | 2 | Medium | | | X |
| 7/6/2010 | NP10-125-000 | RF | Covanta York Renewable Energy, LLC | NCR08064 | \$7,500 | RFC200900132 | CIP-001-1 | 3 | Medium | | | X |
| 7/6/2010 | NP10-125-000 | RF | Covanta York Renewable Energy, LLC | NCR08064 | \$7,500 | RFC200900133 | CIP-001-1 | 4 | Medium | | | X |
| 7/6/2010 | NP10-133-000 | WECC | Hermiston Generating Co., L.P. | NCR05181 | \$59,500 | WECC200901740 | CIP-001-1 | 1 | Medium | | | X |
| 7/6/2010 | NP10-141-000 | WECC | Los Angeles Department of Water and Power | NCR05223 | \$225,000 | WECC200800708 | CIP-001-1 | 1 | Medium | | | X |
| 7/30/2010 | NP10-147-000 | SERC | Greenwood Commissioners of Public Works | NCR01250 | \$10,000 | SERC200900333 | CIP-001-1 | 1 | Medium | | | X |
| 7/30/2010 | NP10-147-000 | SERC | Greenwood Commissioners of Public Works | NCR01250 | \$10,000 | SERC200900334 | CIP-001-1 | 2 | Medium | | | X |
| 7/30/2010 | NP10-147-000 | SERC | Greenwood Commissioners of Public Works | NCR01250 | \$10,000 | SERC200900335 | CIP-001-1 | 3 | Medium | | | X |
| 7/30/2010 | NP10-147-000 | SERC | Greenwood Commissioners of Public Works | NCR01250 | \$10,000 | SERC200900336 | CIP-001-1 | 4 | Medium | | | X |
| 7/30/2010 | NP10-155-000 | SERC | EPCOR USA North Carolina LLC (Roxboro) | NCR09021 | \$30,000 | SERC200800220 | CIP-001-1 | 1 | Medium | | | X |
| 7/30/2010 | NP10-155-000 | SERC | EPCOR USA North Carolina LLC (Roxboro) | NCR09021 | \$30,000 | SERC200800221 | CIP-001-1 | 2 | Medium | | | X |
| 7/30/2010 | NP10-155-000 | SERC | EPCOR USA North Carolina LLC (Roxboro) | NCR09021 | \$30,000 | SERC200800222 | CIP-001-1 | 3 | Medium | | | X |
| 7/30/2010 | NP10-155-000 | SERC | EPCOR USA North Carolina LLC (Roxboro) | NCR09021 | \$30,000 | SERC200800223 | CIP-001-1 | 4 | Medium | | | X |
| 7/30/2010 | NP10-156-000 | SERC | EPCOR USA North Carolina LLC (Southport) | NCR09020 | \$30,000 | SERC200800216 | CIP-001-1 | 1 | Medium | | | X |
| 7/30/2010 | NP10-156-000 | SERC | EPCOR USA North Carolina LLC (Southport) | NCR09020 | \$30,000 | SERC200800217 | CIP-001-1 | 2 | Medium | | | X |
| 7/30/2010 | NP10-156-000 | SERC | EPCOR USA North Carolina LLC (Southport) | NCR09020 | \$30,000 | SERC200800218 | CIP-001-1 | 3 | Medium | | | X |
| 7/30/2010 | NP10-156-000 | SERC | EPCOR USA North Carolina LLC (Southport) | NCR09020 | \$30,000 | SERC200800219 | CIP-001-1 | 4 | Medium | | | X |
| 9/13/2010 | NP10-160-000 | SPP RE | USACE - Tulsa District | NCR06038 | \$0 | SPP200700036 | CIP-001-1 | 2 | Medium | | | X |
| 9/13/2010 | NP10-160-000 | WECC | USACE-Seattle District | NCR05539 | \$0 | WECC200801190 | CIP-001-1 | 1 | Medium | | | X |
| 9/13/2010 | NP10-160-000 | WECC | USACE-Seattle District | NCR05539 | \$0 | WECC200801191 | CIP-001-1 | 3 | Medium | | | X |
| 9/13/2010 | NP10-160-000 | WECC | USACE-Seattle District | NCR05539 | \$0 | WECC200801192 | CIP-001-1 | 4 | Medium | | | X |
| 9/13/2010 | NP10-160-000 | NERC as CEA | WECC RC [California Mexico Reliability Coordinator OC] | NCR05049 | \$0 | NCEA200700064 | CIP-001-1 | 4 | Medium | | | X |
| 9/13/2010 | NP10-160-000 | NERC as CEA | WECC RC [Pacific Northwest Security Coordinator] | NCR05302 | \$0 | NCEA200700058 | CIP-001-1 | 4 | Medium | | | X |
| 9/30/2010 | NP10-170-000 | SERC | Seneca Light and Water | NCR01309 | \$3,000 | SERC200900406 | CIP-001-1 | 2 | Medium | | | X |
| 9/30/2010 | NP10-170-000 | SERC | Seneca Light and Water | NCR01309 | \$3,000 | SERC200900405 | CIP-001-1 | 1 | Medium | | | X |
| 9/30/2010 | NP10-170-000 | SERC | Seneca Light and Water | NCR01309 | \$3,000 | SERC200900404 | CIP-001-1 | 3 | Medium | | | X |
| 9/30/2010 | NP10-170-000 | SERC | Seneca Light and Water | NCR01309 | \$3,000 | SERC200900407 | CIP-001-1 | 4 | Medium | | | X |
| 9/30/2010 | NP10-173-000 | NPCC | Vermont Marble Power Division of Omya Inc | NCR07226 | \$5,000 | NPCC201000144 | CIP-001-1 | 2 | Medium | | | X |
| 9/30/2010 | NP10-173-000 | NPCC | Vermont Marble Power Division of Omya Inc | NCR07226 | \$5,000 | NPCC201000143 | CIP-001-1 | 1 | Medium | | | X |
| 9/30/2010 | NP10-173-000 | NPCC | Vermont Marble Power Division of Omya Inc | NCR07226 | \$5,000 | NPCC200900106 | CIP-001-1 | 3 | Medium | | | X |
| 9/30/2010 | NP10-173-000 | NPCC | Vermont Marble Power Division of Omya Inc | NCR07226 | \$5,000 | NPCC201000145 | CIP-001-1 | 4 | Medium | | | X |
| 9/30/2010 | NP10-184-000 | WECC | Klickitat County PUD | NCR05206 | \$4,800 | WECC200800670 | CIP-001-1 | 4 | Medium | | | X |
| 9/30/2010 | NP10-185-000 | SERC | South Louisiana Electric Cooperative Association | NCR00163 | \$5,000 | SERC200900425 | CIP-001-1 | 1 | Medium | | | X |
| 9/30/2010 | NP10-185-000 | SERC | South Louisiana Electric Cooperative Association | NCR00163 | \$5,000 | SERC200900328 | CIP-001-1 | 4 | Medium | | | X |

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|-------------|---------------|-----------------|---|--|---|-------------------|----------------------|-----|---|--|----------------------------|------------------------------------|
| 9/30/2010 | NP10-186-000 | RF | Fox Energy Company LLC | NCR08021 | \$4,000 | RFC200900178 | CIP-001-1 | 2 | Medium | | | X |
| 11/5/2010 | NP11-08-000 | MRO | Minnesota Power (Allete, Inc.) | NCR00674 | \$62,500 | MRO200900090 | CIP-001-1 | 1 | Medium | | | X |
| 11/5/2010 | NP11-14-000 | WECC | Black Hills Power, Inc. | NCR05030 | \$12,000 | WECC200901655 | CIP-001-1 | 3 | Medium | | | X |
| 11/5/2010 | NP11-19-000 | SPP RE | U.S. Army Corps of Engineers - Little Rock District | NCR06037 | \$0 | SPP200700021 | CIP-001-1 | 2 | Medium | | | X |
| 11/30/2010 | NP11-30-000 | WECC | Clallam County PUD No.1 | NCR05099 | \$15,000 | WECC200901335 | CIP-001-1 | 3 | Medium | | | X |
| 11/30/2010 | NP11-30-000 | WECC | Clallam County PUD No.1 | NCR05099 | \$15,000 | WECC200901334 | CIP-001-1 | 1 | Medium | | | X |
| 11/30/2010 | NP11-32-000 | WECC | Rosebud Operating Services, Inc. | NCR05367 | \$2,000 | WECC201001839 | CIP-001-1 | 2 | Medium | | | X |
| 11/30/2010 | NP11-39-000 | RF | Sunbury Generation LP | NCR06030 | \$3,000 | RFC200900170 | CIP-001-1 | 4 | Medium | | | X |
| 11/30/2010 | NP11-46-000 | SERC | Claiborne Electric Cooperative, Inc. | NCR00499 | \$5,000 | SERC201000436 | CIP-001-1 | 4 | Medium | | | X |
| 11/30/2010 | NP11-46-000 | SERC | Claiborne Electric Cooperative, Inc. | NCR00499 | \$5,000 | SERC201000434 | CIP-001-1 | 2 | Medium | | | X |
| 11/30/2010 | NP11-46-000 | SERC | Claiborne Electric Cooperative, Inc. | NCR00499 | \$5,000 | SERC201000435 | CIP-001-1 | 3 | Medium | | | X |
| 11/30/2010 | NP11-46-000 | SERC | Claiborne Electric Cooperative, Inc. | NCR00499 | \$5,000 | SERC201000433 | CIP-001-1 | 1 | Medium | | | X |
| 12/22/2010 | NP11-62-000 | SPP RE | City of Clarksdale, Mississippi | NCR01071 | \$5,000 | SPP200900117 | CIP-001-1 | 4 | Medium | | | X |
| 12/22/2010 | NP11-62-000 | SPP RE | City of Clarksdale, Mississippi | NCR01071 | \$5,000 | SPP200900116 | CIP-001-1 | 3 | Medium | | | X |
| 12/22/2010 | NP11-62-000 | SPP RE | City of Clarksdale, Mississippi | NCR01071 | \$5,000 | SPP200900114 | CIP-001-1 | 1 | Medium | | | X |
| 12/22/2010 | NP11-62-000 | SPP RE | City of Clarksdale, Mississippi | NCR01071 | \$5,000 | SPP200900115 | CIP-001-1 | 2 | Medium | | | X |
| 12/22/2010 | NP11-71-000 | SPP RE | City Of Minden | NCR06034 | \$3,000 | SPP201000282 | CIP-001-1 | 4 | Medium | | | X |
| 12/22/2010 | NP11-71-000 | SPP RE | City Of Minden | NCR06034 | \$3,000 | SPP201000279 | CIP-001-1 | 1 | Medium | | | X |
| 12/22/2010 | NP11-71-000 | SPP RE | City Of Minden | NCR06034 | \$3,000 | SPP201000281 | CIP-001-1 | 3 | Medium | | | X |
| 12/22/2010 | NP11-71-000 | SPP RE | City Of Minden | NCR06034 | \$3,000 | SPP201000280 | CIP-001-1 | 2 | Medium | | | X |
| 1/31/2011 | NP11-104-000 | RF | Buckeye Power, Inc. | NCR00700 | \$0 | RFC201000612 | CIP-001-1 | R4 | Medium | | | X |
| 1/31/2011 | NP11-104-000 | SERC | East Mississippi Electric Power Association | NCR01226 | \$4,000 | SERC201000520 | CIP-001-1 | R1 | Medium | | | X |
| 1/31/2011 | NP11-104-000 | SERC | East Mississippi Electric Power Association | NCR01226 | \$4,000 | SERC201000521 | CIP-001-1 | R2 | Medium | | | X |
| 1/31/2011 | NP11-104-000 | SERC | East Mississippi Electric Power Association | NCR01226 | \$4,000 | SERC201000522 | CIP-001-1 | R3 | Medium | | | X |
| 1/31/2011 | NP11-104-000 | SERC | French Broad Electric Membership Corporation | NCR01244 | \$5,000 | SERC201000496 | CIP-001-1 | R1 | Medium | | | X |
| 1/31/2011 | NP11-104-000 | SERC | French Broad Electric Membership Corporation | NCR01244 | \$5,000 | SERC201000580 | CIP-001-1 | R2 | Medium | | | X |
| 1/31/2011 | NP11-104-000 | SERC | French Broad Electric Membership Corporation | NCR01244 | \$5,000 | SERC201000581 | CIP-001-1 | R3 | Medium | | | X |
| 1/31/2011 | NP11-104-000 | SERC | French Broad Electric Membership Corporation | NCR01244 | \$5,000 | SERC201000582 | CIP-001-1 | R4 | Medium | | | X |
| 1/31/2011 | NP11-104-000 | NPCC | Mt. Tom Generating Co., LLC | NCR10050 | \$0 | NPCC201000166 | CIP-001-1 | R4 | Medium | | | X |
| 1/31/2011 | NP11-85-000 | Texas RE | Scurry County Wind LP | NCR10027 | \$3,000 | TRE200900071 | CIP-001-1 | R4 | Medium | | | X |
| 2/23/2011 | NP11-115-000 | Texas RE | BASF Corp | NCR04011 | \$11,000 | TRE201000089 | CIP-001-1 | R2 | Medium | | | X |
| 2/28/2011 | NP11-130-000 | WECC | Silicon Valley Power | NCR05392 | \$94,000 | WECC200800745 | CIP-001-1 | R1 | Medium | | | X |
| 2/28/2011 | NP11-130-000 | WECC | Silicon Valley Power | NCR05392 | \$94,000 | WECC200800748 | CIP-001-1 | R4 | Medium | | | X |
| 2/28/2011 | NP11-130-000 | WECC | Silicon Valley Power | NCR05392 | \$94,000 | WECC200800747 | CIP-001-1 | R3 | Medium | | | X |
| 2/28/2011 | NP11-130-000 | WECC | Silicon Valley Power | NCR05392 | \$94,000 | WECC200800746 | CIP-001-1 | R2 | Medium | | | X |
| 3/31/2011 | NP11-162-000 | SERC | Town of Sharpsburg | NCR01348 | \$0 | SERC201000722 | CIP-001-1 | R1 | Medium | | | X |
| 3/31/2011 | NP11-162-000 | SERC | Town of Sharpsburg | NCR01348 | \$0 | SERC201000724 | CIP-001-1 | R3 | Medium | | | X |
| 3/31/2011 | NP11-162-000 | SERC | Town of Sharpsburg | NCR01348 | \$0 | SERC201000725 | CIP-001-1 | R4 | Medium | | | X |
| 3/31/2011 | NP11-162-000 | SERC | Town of Sharpsburg | NCR01348 | \$0 | SERC201000723 | CIP-001-1 | R2 | Medium | | | X |
| 3/31/2011 | NP11-162-000 | SERC | Town of Stantonburg | NCR01349 | \$0 | SERC201000689 | CIP-001-1 | R1 | Medium | | | X |
| 3/31/2011 | NP11-162-000 | SERC | Town of Stantonburg | NCR01349 | \$0 | SERC201000690 | CIP-001-1 | R2 | Medium | | | X |
| 3/31/2011 | NP11-162-000 | SERC | Town of Stantonburg | NCR01349 | \$0 | SERC201000691 | CIP-001-1 | R3 | Medium | | | X |
| 3/31/2011 | NP11-162-000 | SERC | Town of Stantonburg | NCR01349 | \$0 | SERC201000692 | CIP-001-1 | R4 | Medium | | | X |
| 3/31/2011 | NP11-162-000 | SERC | Town of Winterville | NCR01352 | \$0 | SERC201000693 | CIP-001-1 | R1 | Medium | | | X |
| 3/31/2011 | NP11-162-000 | SERC | Town of Winterville | NCR01352 | \$0 | SERC201000694 | CIP-001-1 | R2 | Medium | | | X |
| 3/31/2011 | NP11-162-000 | SERC | Town of Winterville | NCR01352 | \$0 | SERC201000695 | CIP-001-1 | R3 | Medium | | | X |
| 3/31/2011 | NP11-162-000 | SERC | Town of Winterville | NCR01352 | \$0 | SERC201000696 | CIP-001-1 | R4 | Medium | | | X |
| 5/26/2011 | NP11-183-000 | NPCC | CPI (CP) LLC --- CURTIS PALMER HYDROELECTRIC | NCR07076 | \$15,000 | NPCC200900075 | CIP-001-1 | R3 | Medium | | | X |

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|-------------|---------------|-----------------|--|--|---|-------------------|----------------------|-----|---|--|----------------------------|------------------------------------|
| 5/26/2011 | NP11-183-000 | NPCC | CPI (CP) LLC --- CURTIS PALMER HYDROELECTRIC | NCR07076 | \$15,000 | NPCC200900073 | CIP-001-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-183-000 | NPCC | CPI (CP) LLC --- CURTIS PALMER HYDROELECTRIC | NCR07076 | \$15,000 | NPCC200900074 | CIP-001-1 | R2 | Medium | | | X |
| 5/26/2011 | NP11-183-000 | NPCC | CPI (CP) LLC --- CURTIS PALMER HYDROELECTRIC | NCR07076 | \$15,000 | NPCC200900076 | CIP-001-1 | R4 | Medium | | | X |
| 5/26/2011 | NP11-190-000 | RF | Hoosier Energy REC, Inc. | NCR00794 | \$80,000 | RFC200900179 | CIP-001-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-199-000 | SERC | Central Electric Power Cooperative, Inc. | NCR01191 | \$5,000 | SERC201000553 | CIP-001-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-199-000 | SERC | Central Electric Power Cooperative, Inc. | NCR01191 | \$5,000 | SERC201000554 | CIP-001-1 | R2 | Medium | | | X |
| 5/26/2011 | NP11-199-000 | SERC | Central Electric Power Cooperative, Inc. | NCR01191 | \$5,000 | SERC201000555 | CIP-001-1 | R3 | Medium | | | X |
| 5/26/2011 | NP11-199-000 | SERC | Central Electric Power Cooperative, Inc. | NCR01191 | \$5,000 | SERC201000556 | CIP-001-1 | R4 | Medium | | | X |
| 5/26/2011 | NP11-199-000 | NPCC | Littleton Electric Light Department | NCR00164 | \$5,000 | NPCC200900111 | CIP-001-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-199-000 | NPCC | Littleton Electric Light Department | NCR00164 | \$5,000 | NPCC201000213 | CIP-001-1 | R2 | Medium | | | X |
| 5/26/2011 | NP11-199-000 | NPCC | Littleton Electric Light Department | NCR00164 | \$5,000 | NPCC200900112 | CIP-001-1 | R3 | Medium | | | X |
| 5/26/2011 | NP11-199-000 | NPCC | Littleton Electric Light Department | NCR00164 | \$5,000 | NPCC200900113 | CIP-001-1 | R4 | Medium | | | X |
| 6/29/2011 | NP11-219-000 | RF | City of Batavia Municipal Electric Utility | NCR00711 | \$10,000 | RFC200900223 | CIP-001-1 | R1 | Medium | | | X |
| 7/28/2011 | NP11-238-000 | SPP RE | Southwestern Power Administration | NCR01144 | No Penalty | SPP200900097 | CIP-004-1 | R2 | Medium | | | X |
| 7/28/2011 | NP11-238-000 | SPP RE | Southwestern Power Administration | NCR01144 | No Penalty | SPP200900098 | CIP-004-1 | R3 | Lower | | | X |
| 7/28/2011 | NP11-238-000 | SPP RE | Southwestern Power Administration | NCR01144 | No Penalty | SPP200900099 | CIP-004-1 | R4 | Lower | | | X |
| 7/28/2011 | NP11-238-000 | SPP RE | Southwestern Power Administration | NCR01144 | No Penalty | SPP200900161 | CIP-007-1 | R1 | Medium | | | X |
| 7/28/2011 | NP11-241-000 | NPCC | Dynegy Inc. | NCR00200 | \$50,000 | NPCC200900093 | CIP-001-1 | R2 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | NPCC | Boralex Stratton Energy, LP | NCR10352 | \$5,000 | NPCC201000209 | CIP-001-1 | R1 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | NPCC | Boralex Stratton Energy, LP | NCR10352 | \$5,000 | NPCC201000210 | CIP-001-1 | R2 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | NPCC | Boralex Stratton Energy, LP | NCR10352 | \$5,000 | NPCC201000211 | CIP-001-1 | R3 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | NPCC | Boralex Stratton Energy, LP | NCR10352 | \$5,000 | NPCC201000212 | CIP-001-1 | R4 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | SERC | Haywood Electric Membership Corporation | NCR10293 | \$0 | SERC201100761 | CIP-001-1 | R1 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | SERC | Haywood Electric Membership Corporation | NCR10293 | \$0 | SERC201100763 | CIP-001-1 | R3 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | SERC | Haywood Electric Membership Corporation | NCR10293 | \$0 | SERC201100762 | CIP-001-1 | R4 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | SERC | Haywood Electric Membership Corporation | NCR10293 | \$0 | SERC201100764 | CIP-001-1 | R2 | Medium | | | X |
| 8/31/2011 | NP11-260-000 | SPP RE | Louisiana Energy and Power Authority | NCR01116 | \$25,000 | SPP200900072 | CIP-001-1 | R2 | Medium | | | X |
| 8/31/2011 | NP11-260-000 | SPP RE | Louisiana Energy and Power Authority | NCR01116 | \$25,000 | SPP200900071 | CIP-001-1 | R1 | Medium | | | X |
| 8/31/2011 | NP11-265-000 | SPP RE | Cleco Corporation | NCR01083 | \$27,000 | SPP201000261 | CIP-001-1 | R1 | Medium | | | X |
| 8/31/2011 | NP11-266-000 | SERC | City of Camden | NCR01195 | \$0 | SERC201000557 | CIP-001-1 | R1 | Medium | | | X |
| 8/31/2011 | NP11-266-000 | SERC | City of Camden | NCR01195 | \$0 | SERC201000558 | CIP-001-1 | R2 | Medium | | | X |
| 9/30/2011 | NP11-268-000 | Texas RE | Electric Reliability Council of Texas, Inc. | NCR04056 | \$384,000 | TRE200800052 | CIP-001-1 | R1 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Electrical District No. 2 | NCR05142 | \$6,500 | WECC201002329 | CIP-001-1 | R1 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Electrical District No. 2 | NCR05142 | \$6,500 | WECC201002330 | CIP-001-1 | R2 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Electrical District No. 2 | NCR05142 | \$6,500 | WECC201002331 | CIP-001-1 | R3 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Electrical District No. 2 | NCR05142 | \$6,500 | WECC201002332 | CIP-001-1 | R4 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | SPP RE | Lubbock Power And Light | NCR06048 | \$14,000 | SPP201100529 | CIP-001-1 | R1 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Thermo Power and Electric LLC | NCR05425 | \$10,000 | WECC200901621 | CIP-001-1 | R1 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Thermo Power and Electric LLC | NCR05425 | \$10,000 | WECC200901622 | CIP-001-1 | R2 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Thermo Power and Electric LLC | NCR05425 | \$10,000 | WECC200901623 | CIP-001-1 | R3 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | Texas RE | ExxonMobil Refining and Supply Company | NCR04058 | \$13,000 | TRE201000123 | CIP-001-1 | R2 | Medium | | | X |
| 9/28/2012 | NP12-47-000 | WECC | Public Service Company of New Mexico | NCR05333 | \$79,000 | WECC201102547 | CIP-001-1 | R1 | Medium | | | X |
| 11/27/2013 | NP14-8-000 | RF | Whiting Clean Energy, Inc. | NCR00417 | \$35,000 | RFC2012011350 | CIP-001-1 | R2 | Medium | Minimal | 1/10/2013 | X |

Exhibit 102

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

Exhibit 102 is a listing of the “Unidentified registered Entities” covered in this judicial review. I extracted this list from NERC’s “Searchable Spreadsheet” of NOPs, available at:
<https://www.nerc.com/pa/comp/CE/Pages/Enforcement-and-Mitigation.aspx>

(Note: NERC did not begin to include the “Mitigation Completion Date” on the spreadsheet until February of 2013. Prior to that, the “Mitigation Completion Date” is available in the Notices of Penalty.)

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|----------------------------------|--|---|-------------------|----------------------|-----------------|---|--|----------------------------|------------------------------------|
| 7/6/2010 | NP10-130-000 | SERC | NERC | NCRXXXXX | \$0 | SERC200900264 | CIP-004-1 | 4.2 | Lower | | | X |
| 7/6/2010 | NP10-131-000 | SERC | NERC | NCRXXXXX | \$5,000 | SERC200800211 | CIP-004-1 | 4 | Lower | | | X |
| 7/6/2010 | NP10-134-000 | SPP RE | NERC | NCRXXXXX | \$0 | SPP200800054 | CIP-004-1 | 3 | Lower | | | X |
| 7/6/2010 | NP10-135-000 | WECC | NERC | NCRXXXXX | \$8,000 | WECC200901701 | CIP-005-1 | 2 | Medium | | | X |
| 7/6/2010 | NP10-136-000 | WECC | NERC | NCRXXXXX | \$7,000 | WECC200901681 | CIP-004-1 | 3 | Medium | | | X |
| 7/6/2010 | NP10-136-000 | WECC | NERC | NCRXXXXX | \$7,000 | WECC200901682 | CIP-004-1 | 2 | Lower | | | X |
| 7/6/2010 | NP10-137-000 | WECC | NERC | NCRXXXXX | \$39,000 | WECC200801087 | CIP-001-1 | 1 | Medium | | | X |
| 7/6/2010 | NP10-137-000 | WECC | NERC | NCRXXXXX | \$39,000 | WECC200800963 | CIP-004-1 | 3 | Medium | | | X |
| 7/6/2010 | NP10-138-000 | RF | NERC | NCRXXXXX | \$5,000 | RFC200900134 | CIP-004-1 | 4 | Medium | | | X |
| 7/6/2010 | NP10-139-000 | WECC | NERC | NCRXXXXX | \$3,000 | WECC200901275 | CIP-003-1 | 2 | Medium | | | X |
| 7/6/2010 | NP10-140-000 | RF | NERC | NCRXXXXX | \$5,600 | RFC200900116 | CIP-004-1 | 4 | Lower | | | X |
| 7/6/2010 | NP10-140-000 | RF | NERC | NCRXXXXX | \$5,600 | RFC200900139 | CIP-004-1 | 3.2 | Lower | | | X |
| 7/30/2010 | NP10-159-000 | WECC | NERC | NCRXXXXX | \$109,000 | WECC200801165 | CIP-002-1 | 3 | High | | | X |
| 7/30/2010 | NP10-159-000 | WECC | NERC | NCRXXXXX | \$109,000 | WECC200901309 | CIP-003-1 | 3 | Lower | | | X |
| 7/30/2010 | NP10-159-000 | WECC | NERC | NCRXXXXX | \$109,000 | WECC200901310 | CIP-004-1 | 4 | Lower | | | X |
| 7/30/2010 | NP10-159-000 | WECC | NERC | NCRXXXXX | \$109,000 | WECC200800922 | CIP-008-1 | 1 | Lower | | | X |
| 7/30/2010 | NP10-159-000 | WECC | NERC | NCRXXXXX | \$109,000 | WECC200901311 | CIP-009-1 | 1 | Medium | | | X |
| 9/13/2010 | NP10-160-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$0 | WECC200800964 | CIP-003-1 | 1 | Lower | | | X |
| 9/13/2010 | NP10-160-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$0 | WECC200800970 | CIP-007-1 | 1 | Medium/Lower | | | X |
| 10/7/2010 | NP11-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200901336 | CIP-004-1 | 2 | Medium | | | X |
| 10/7/2010 | NP11-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200901337 | CIP-004-1 | 3 | Medium | | | X |
| 10/7/2010 | NP11-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200901472 | CIP-004-1 | 2 | Medium | | | X |
| 10/7/2010 | NP11-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200901473 | CIP-004-1 | 3 | Medium | | | X |
| 10/7/2010 | NP11-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200901474 | CIP-004-1 | 4 | Medium | | | X |
| 10/7/2010 | NP11-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$9,000 | WECC200800920 | CIP-009-1 | 1 | Medium | | | X |
| 10/7/2010 | NP11-3-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$6,000 | SERC200900287 | CIP-002-1 | 3 | High | | | X |
| 10/7/2010 | NP11-3-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$6,000 | SERC200900288 | CIP-004-1 | 2.1 | Medium | | | X |
| 10/7/2010 | NP11-3-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$6,000 | SERC200900289 | CIP-004-1 | 3 | Medium | | | X |
| 10/7/2010 | NP11-4-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | FRCC200800139 | CIP-004-1 | 4 | Lower | | | X |
| 10/7/2010 | NP11-5-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$16,000 | SERC200800170 | CIP-002-1 | 1 | Medium | | | X |
| 10/7/2010 | NP11-5-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$16,000 | SERC200800171 | CIP-002-1 | 2 | High | | | X |
| 10/7/2010 | NP11-5-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$16,000 | SERC200800172 | CIP-002-1 | 3 | High | | | X |
| 10/7/2010 | NP11-5-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$16,000 | SERC200800173 | CIP-003-1 | 1 | Medium | | | X |
| 10/7/2010 | NP11-5-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$16,000 | SERC200800174 | CIP-003-1 | 2 | Medium | | | X |
| 10/7/2010 | NP11-5-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$16,000 | SERC200800175 | CIP-003-1 | 3 | Lower | | | X |
| 10/7/2010 | NP11-5-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$16,000 | SERC200800176 | CIP-004-1 | 2 | Medium | | | X |
| 10/7/2010 | NP11-5-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$16,000 | SERC200800177 | CIP-004-1 | 3 | Medium | | | X |
| 10/7/2010 | NP11-5-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$16,000 | SERC200800178 | CIP-004-1 | 4 | Medium | | | X |
| 10/7/2010 | NP11-5-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$16,000 | SERC200900291 | CIP-004-1 | 2.1 | Medium | | | X |
| 10/7/2010 | NP11-5-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$16,000 | SERC200800179 | CIP-007-1 | 1 | Medium | | | X |
| 10/7/2010 | NP11-5-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$16,000 | SERC200800180 | CIP-008-1 | 1 | Lower | | | X |
| 10/7/2010 | NP11-5-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$16,000 | SERC200800181 | CIP-009-1 | 1 | Medium | | | X |
| 10/7/2010 | NP11-5-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$16,000 | SERC200800182 | CIP-009-1 | 2 | Lower | | | X |
| 11/5/2010 | NP11-21-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$8,000 | RFC200900163 | CIP-006-1 | 3.1 | Medium | | | X |
| 11/5/2010 | NP11-22-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | SERC200800241 | CIP-004-1 | 4.2 | Lower | | | X |
| 11/30/2010 | NP11-47-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC201000546 | CIP-003-1 | 2/2.1 | Lower | | | X |
| 11/30/2010 | NP11-56-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC201000500 | CIP-002-1 | 4 | Lower | | | X |
| 11/30/2010 | NP11-56-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC201000499 | CIP-002-1 | 2 | High | | | X |
| 12/22/2010 | NP11-59-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$7,000 | RFC200900143 | CIP-004-1 | 3 | Lower | | | X |
| 12/22/2010 | NP11-63-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | WECC200801212 | CIP-008-1 | 1 | Lower | | | X |
| 12/22/2010 | NP11-64-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$38,500 | WECC200901699 | CIP-004-1 | 4 | | | | X |
| 12/22/2010 | NP11-64-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$38,500 | WECC200901726 | CIP-004-1 | 3 | Medium | | | X |
| 12/22/2010 | NP11-64-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$38,500 | WECC200901650 | CIP-004-1 | 2 | Medium | | | X |
| 12/22/2010 | NP11-70-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC200801147 | CIP-004-1 | 4 | Medium | | | X |
| 12/22/2010 | NP11-70-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC200801146 | CIP-004-1 | 3 | Medium | | | X |
| 12/22/2010 | NP11-72-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$2,000 | SERC201000493 | CIP-007-1 | 3.1 | Lower | | | X |
| 12/22/2010 | NP11-76-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC200900392 | CIP-004-1 | 4 | Lower | | | X |
| 12/22/2010 | NP11-79-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$100,000 | FRCC200800094 | CIP-001-1 | 2 | Medium | | | X |
| 12/22/2010 | NP11-79-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$100,000 | FRCC200800224 | CIP-001-1 | 1 | Medium | | | X |
| 12/22/2010 | NP11-79-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$100,000 | FRCC200900170 | CIP-004-1 | 4 | Lower | | | X |
| 12/22/2010 | NP11-81-000 | MRO, SPP | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$50,000 | MRO200800070 | CIP-004-1 | 3 | Lower | | | X |
| 12/22/2010 | NP11-81-000 | MRO, SPP | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$50,000 | MRO200800071 | CIP-004-1 | 4 | Lower | | | X |
| 12/22/2010 | NP11-81-000 | MRO, SPP | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$50,000 | SPP200800058 | CIP-004-1 | 4 | Lower | | | X |
| 1/31/2011 | NP11-102-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$6,500 | WECC200901728 | CIP-007-1 | R4 | Medium | | | X |
| 1/31/2011 | NP11-104-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$1,800 | SPP200900184 | CIP-003-1 | R1 (R1.1, R1.2) | Medium | | | X |
| 1/31/2011 | NP11-104-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201000219 | CIP-003-1 | R1 | Lower | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|-----------------|---|--|----------------------------|------------------------------------|
| 1/31/2011 | NP11-104-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | NPCC201000131 | CIP-004-1 | R2.3 | Lower | | | X |
| 1/31/2011 | NP11-104-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | NPCC201000153 | CIP-004-1 | R3 | Lower | | | X |
| 1/31/2011 | NP11-104-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$600 | SPP200900160 | CIP-004-1 | R3 | Medium | | | X |
| 1/31/2011 | NP11-104-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO200900106 | CIP-004-1 | R2 | Medium | | | X |
| 1/31/2011 | NP11-104-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO200900107 | CIP-004-1 | R3 | Lower | | | X |
| 1/31/2011 | NP11-104-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO200900108 | CIP-004-1 | R4 | Lower | | | X |
| 1/31/2011 | NP11-104-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201000220 | CIP-004-1 | R2 | Medium | | | X |
| 1/31/2011 | NP11-104-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201000221 | CIP-004-1 | R4 | Lower | | | X |
| 1/31/2011 | NP11-104-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$0 | SPP200900182 | CIP-004-1 | R4.1; R4.2 | Medium | | | X |
| 1/31/2011 | NP11-104-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$700 | SPP200900189 | CIP-006-1 | R4 | Lower | | | X |
| 1/31/2011 | NP11-104-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201000223 | CIP-007-2 | R6 | Lower | | | X |
| 1/31/2011 | NP11-104-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$500 | SPP200900192 | CIP-008-1 | R1 (R1.2, R1.6) | Lower | | | X |
| 1/31/2011 | NP11-104-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$700 | SPP200900194 | CIP-009-1 | R2 | Lower | | | X |
| 1/31/2011 | NP11-104-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$0 | SPP201000355 | CIP-009-1 | R5 | Lower | | | X |
| 1/31/2011 | NP11-98-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | WECC200901620 | CIP-003-1 | R6 | Lower | | | X |
| 1/31/2011 | NP11-98-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | WECC200901619 | CIP-006-1 | R1 | Medium | | | X |
| 2/23/2011 | NP11-106-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$15,000 | RFC201000242 | CIP-004-1 | R4.1 | Lower | | | X |
| 2/23/2011 | NP11-106-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$15,000 | RFC201000243 | CIP-007-1 | R1.1 | Medium | | | X |
| 2/23/2011 | NP11-106-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$15,000 | RFC200900166 | CIP-007-1 | R4 | Medium | | | X |
| 2/23/2011 | NP11-111-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$120,000 | MRO200900118 | CIP-007-1 | R1 | Medium | | | X |
| 2/23/2011 | NP11-116-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | FRCC200800093 | CIP-004-1 | R3 | Medium | | | X |
| 2/23/2011 | NP11-124-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$100,000 | RFC201000236 | CIP-003-1 | R4 | Medium | | | X |
| 2/23/2011 | NP11-124-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$100,000 | RFC200900198 | CIP-004-1 | R4.1 | Lower | | | X |
| 2/23/2011 | NP11-124-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$100,000 | RFC200900125 | CIP-004-1 | R4.2 | Medium | | | X |
| 2/23/2011 | NP11-124-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$100,000 | RFC200900135 | CIP-004-1 | R2 | Medium | | | X |
| 2/23/2011 | NP11-124-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$100,000 | RFC200900197 | CIP-004-1 | R3 | Medium | | | X |
| 2/23/2011 | NP11-124-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$100,000 | RFC200900136 | CIP-004-1 | R3 | Medium | | | X |
| 2/23/2011 | NP11-124-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$100,000 | RFC200900137 | CIP-007-1 | R1 | Medium | | | X |
| 2/23/2011 | NP11-124-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$100,000 | RFC200900138 | CIP-008-1 | R1 | Lower | | | X |
| 2/23/2011 | NP11-125-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX | \$77,000 | RFC200800111 | CIP-004-1 | R3 | Medium | | | X |
| 2/23/2011 | NP11-125-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX | \$77,000 | SPP200800066 | CIP-004-1 | R3 | Medium | | | X |
| 2/23/2011 | NP11-125-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX | \$77,000 | SPP200800065 | CIP-004-1 | R2 | Medium | | | X |
| 2/23/2011 | NP11-125-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX | \$77,000 | RFC200800110 | CIP-004-1 | R2.1 | Medium | | | X |
| 2/23/2011 | NP11-127-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | FRCC200800085 | CIP-004-1 | R4.1 | Lower | | | X |
| 2/23/2011 | NP11-127-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | FRCC200900138 | CIP-004-1 | R4.1 | Lower | | | X |
| 2/23/2011 | NP11-128-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$450,000 | WECC200800912 | CIP-003-1 | R3 | Lower | | | X |
| 2/23/2011 | NP11-128-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$450,000 | WECC200800911 | CIP-003-1 | R1 | Medium | | | X |
| 2/23/2011 | NP11-128-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$450,000 | WECC200800913 | CIP-004-1 | R2 | Lower | | | X |
| 2/23/2011 | NP11-128-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$450,000 | WECC200800914 | CIP-004-1 | R3 | Medium | | | X |
| 2/23/2011 | NP11-128-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$450,000 | WECC200800915 | CIP-004-1 | R4 | Lower | | | X |
| 2/23/2011 | NP11-128-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$450,000 | WECC200800916 | CIP-007-1 | R1 | Medium | | | X |
| 2/23/2011 | NP11-128-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$450,000 | WECC200800917 | CIP-008-1 | R1 | Lower | | | X |
| 2/23/2011 | NP11-128-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$450,000 | WECC200800919 | CIP-009-1 | R2 | Lower | | | X |
| 2/23/2011 | NP11-128-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$450,000 | WECC200800918 | CIP-009-1 | R1 | Medium | | | X |
| 2/28/2011 | NP11-133-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$9,000 | TRE201000096 | CIP-004-1 | R4 | Medium | | | X |
| 2/28/2011 | NP11-133-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$2,500 | NPCC201000159 | CIP-004-1 | R4.2 | Medium | | | X |
| 2/28/2011 | NP11-133-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$0 | SPP200900183 | CIP-006-1 | R1.1 | Medium | | | X |
| 2/28/2011 | NP11-133-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201000213 | CIP-006-1 | R1.8 | Lower | | | X |
| 2/28/2011 | NP11-133-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201000225 | CIP-007-1 | R6 | Medium | | | X |
| 3/30/2011 | NP11-136-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$14,500 | WECC200901642 | CIP-002-1 | R2 | High | | | X |
| 3/30/2011 | NP11-136-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$14,500 | WECC200901698 | CIP-007-1 | R6 | Lower | | | X |
| 3/30/2011 | NP11-136-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$14,500 | WECC200901643 | CIP-008-1 | R1 | Lower | | | X |
| 3/30/2011 | NP11-137-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200800794 | CIP-001-1 | R2 | Medium | | | X |
| 3/30/2011 | NP11-137-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200800796 | CIP-001-1 | R4 | Medium | | | X |
| 3/30/2011 | NP11-137-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200800793 | CIP-001-1 | R1 | Medium | | | X |
| 3/30/2011 | NP11-137-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200800795 | CIP-001-1 | R3 | Medium | | | X |
| 3/30/2011 | NP11-137-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200800901 | CIP-004-1 | R2 | Medium | | | X |
| 3/30/2011 | NP11-137-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200800902 | CIP-004-1 | R3 | Lower | | | X |
| 3/30/2011 | NP11-137-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200800903 | CIP-004-1 | R4 | Medium | | | X |
| 3/30/2011 | NP11-137-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200800904 | CIP-007-1 | R1 | Medium | | | X |
| 3/30/2011 | NP11-137-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200800905 | CIP-008-1 | R1 | Lower | | | X |
| 3/30/2011 | NP11-137-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200800906 | CIP-009-1 | R1 | Lower | | | X |
| 3/30/2011 | NP11-137-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$106,000 | WECC200800907 | CIP-009-1 | R2 | Lower | | | X |
| 3/30/2011 | NP11-140-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$27,000 | WECC200901649 | CIP-003-1 | R2 | Lower | | | X |
| 3/30/2011 | NP11-140-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$27,000 | WECC200901648 | CIP-003-1 | R1 | Lower | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|----------------------------------|--|---|-------------------|----------------------|------|---|--|----------------------------|------------------------------------|
| 3/30/2011 | NP11-140-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$27,000 | WECC200901646 | CIP-004-1 | R2 | Medium | | | X |
| 3/30/2011 | NP11-140-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$27,000 | WECC200901647 | CIP-004-1 | R3 | Lower | | | X |
| 3/30/2011 | NP11-140-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$27,000 | WECC200901634 | CIP-004-1 | R4 | Lower | | | X |
| 3/30/2011 | NP11-140-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$27,000 | WECC200901636 | CIP-007-1 | R4 | Medium | | | X |
| 3/30/2011 | NP11-140-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$27,000 | WECC200901635 | CIP-007-1 | R1 | Medium | | | X |
| 3/30/2011 | NP11-143-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | SERC200900299 | CIP-004-1 | R2.3 | Lower | | | X |
| 3/30/2011 | NP11-143-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | SERC200900303 | CIP-004-1 | R2.1 | Medium | | | X |
| 3/30/2011 | NP11-145-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$13,000 | WECC200901677 | CIP-003-1 | R1 | Lower | | | X |
| 3/30/2011 | NP11-145-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$13,000 | WECC200901678 | CIP-006-1 | R1 | Lower | | | X |
| 3/30/2011 | NP11-145-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$13,000 | WECC200901679 | CIP-007-1 | R1 | Medium | | | X |
| 3/30/2011 | NP11-146-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$52,500 | RFC200900270 | CIP-002-1 | R3.2 | Lower | | | X |
| 3/30/2011 | NP11-146-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$52,500 | RFC200900264 | CIP-002-1 | R3.2 | Lower | | | X |
| 3/30/2011 | NP11-146-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$52,500 | RFC200900267 | CIP-002-1 | R3.2 | Lower | | | X |
| 3/30/2011 | NP11-146-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$52,500 | RFC200900193 | CIP-004-1 | R3 | Medium | | | X |
| 3/30/2011 | NP11-146-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$52,500 | RFC200900265 | CIP-004-1 | R4 | Lower | | | X |
| 3/30/2011 | NP11-146-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$52,500 | RFC200900191 | CIP-004-1 | R3 | Medium | | | X |
| 3/30/2011 | NP11-146-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$52,500 | RFC200900271 | CIP-004-1 | R4 | Lower | | | X |
| 3/30/2011 | NP11-146-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$52,500 | RFC200900268 | CIP-004-1 | R4 | Lower | | | X |
| 3/30/2011 | NP11-146-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$52,500 | RFC200900129 | CIP-004-1 | R2.1 | Medium | | | X |
| 3/30/2011 | NP11-146-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$52,500 | RFC200900192 | CIP-004-1 | R3 | Medium | | | X |
| 3/30/2011 | NP11-146-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$52,500 | RFC200900130 | CIP-004-1 | R2.1 | Medium | | | X |
| 3/30/2011 | NP11-146-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$52,500 | RFC200900266 | CIP-008-1 | R1 | Lower | | | X |
| 3/30/2011 | NP11-146-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$52,500 | RFC200900272 | CIP-008-1 | R1 | Lower | | | X |
| 3/30/2011 | NP11-146-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$52,500 | RFC200900269 | CIP-008-1 | R1 | Lower | | | X |
| 3/30/2011 | NP11-149-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$20,000 | RFC200900184 | CIP-006-1 | R4 | Medium | | | X |
| 3/30/2011 | NP11-149-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$20,000 | RFC200900183 | CIP-006-1 | R1.6 | Medium | | | X |
| 3/30/2011 | NP11-150-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201000157 | CIP-006-1 | R1 | Lower | | | X |
| 3/30/2011 | NP11-155-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$2,000 | WECC200901705 | CIP-003-1 | R2 | Lower | | | X |
| 3/30/2011 | NP11-156-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$12,500 | SERC200900350 | CIP-006-1 | R4 | Lower | | | X |
| 3/30/2011 | NP11-156-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$12,500 | SERC200900348 | CIP-006-1 | R2 | Medium | | | X |
| 3/30/2011 | NP11-156-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$12,500 | SERC200900349 | CIP-006-1 | R3 | Medium | | | X |
| 3/30/2011 | NP11-157-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$7,000 | SERC200900337 | CIP-004-1 | R2.3 | Lower | | | X |
| 3/30/2011 | NP11-157-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$7,000 | SERC200900338 | CIP-004-1 | R3 | Lower | | | X |
| 3/30/2011 | NP11-161-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | WECC200901259 | CIP-001-1 | R1 | Medium | | | X |
| 3/30/2011 | NP11-161-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | WECC200901260 | CIP-001-1 | R2 | Medium | | | X |
| 3/30/2011 | NP11-161-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | WECC200901423 | CIP-004-1 | R3 | Medium | | | X |
| 3/30/2011 | NP11-161-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | WECC200901625 | CIP-004-1 | R2 | Lower | | | X |
| 3/30/2011 | NP11-161-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | WECC200901644 | CIP-006-1 | R1 | Lower | | | X |
| 3/30/2011 | NP11-161-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | WECC200801706 | CIP-007-1 | R1 | Lower | | | X |
| 3/30/2011 | NP11-161-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | WECC200901491 | CIP-007-1 | R5 | Lower | | | X |
| 3/30/2011 | NP11-161-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | WECC200801185 | CIP-008-1 | R1 | Lower | | | X |
| 3/31/2011 | NP11-162-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$8,000 | TRE201000099 | CIP-004-1 | R4 | Medium | | | X |

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|-------------|---------------|------------------|--------------------------------|--|---|-------------------|----------------------|------------|---|--|----------------------------|------------------------------------|
| 3/31/2011 | NP11-162-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$2,500 | NPCC201000178 | CIP-004-2 | R4.2 | N/A | | | X |
| 3/31/2011 | NP11-162-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$2,500 | NPCC201000179 | CIP-004-2 | R4.2 | N/A | | | X |
| 3/31/2011 | NP11-162-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$2,500 | NPCC201000180 | CIP-004-2 | R4.2 | N/A | | | X |
| 4/29/2011 | NP11-166-000 | SPP RE, Texas RE | Unidentified Registered Entity | NCRXXXXX | \$50,000 | SPP200900138 | CIP-003-1 | R1.1 | Lower | | | X |
| 4/29/2011 | NP11-166-000 | SPP RE, Texas RE | Unidentified Registered Entity | NCRXXXXX | \$50,000 | SPP200900139 | CIP-004-1 | R2.2.2 | Lower | | | X |
| 4/29/2011 | NP11-166-000 | SPP RE, Texas RE | Unidentified Registered Entity | NCRXXXXX | \$50,000 | SPP200900108 | CIP-005-1 | R2 | Medium | | | X |
| 4/29/2011 | NP11-166-000 | SPP RE, Texas RE | Unidentified Registered Entity | NCRXXXXX | \$50,000 | SPP201000340 | CIP-005-2 | R1 | Medium | | | X |
| 4/29/2011 | NP11-166-000 | SPP RE, Texas RE | Unidentified Registered Entity | NCRXXXXX | \$50,000 | SPP200900109 | CIP-006-1 | R1.8 | Medium | | | X |
| 4/29/2011 | NP11-166-000 | SPP RE, Texas RE | Unidentified Registered Entity | NCRXXXXX | \$50,000 | SPP200900143 | CIP-007-1 | R1 | Medium | | | X |
| 4/29/2011 | NP11-166-000 | SPP RE, Texas RE | Unidentified Registered Entity | NCRXXXXX | \$50,000 | SPP200900144 | CIP-008-1 | R1.6 | Lower | | | X |
| 4/29/2011 | NP11-167-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$89,000 | WECC200901729 | CIP-004-1 | R4 | Lower | | | X |
| 4/29/2011 | NP11-167-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$89,000 | WECC200901730 | CIP-005-1 | R4 | Medium | | | X |
| 4/29/2011 | NP11-167-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$89,000 | WECC200901734 | CIP-007-1 | R4 | Medium | | | X |
| 4/29/2011 | NP11-167-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$89,000 | WECC200901736 | CIP-007-1 | R6 | Medium | | | X |
| 4/29/2011 | NP11-167-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$89,000 | WECC200901737 | CIP-007-1 | R7 | Lower | | | X |
| 4/29/2011 | NP11-167-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$89,000 | WECC200901733 | CIP-007-1 | R3 | Lower | | | X |
| 4/29/2011 | NP11-167-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$89,000 | WECC200901731 | CIP-007-1 | R1 | Medium | | | X |
| 4/29/2011 | NP11-167-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$89,000 | WECC200901732 | CIP-007-1 | R2 | Medium | | | X |
| 4/29/2011 | NP11-167-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$89,000 | WECC200901735 | CIP-007-1 | R5 | Lower | | | X |
| 4/29/2011 | NP11-167-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$89,000 | WECC200901738 | CIP-007-1 | R8 | Medium | | | X |
| 4/29/2011 | NP11-167-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$89,000 | WECC200901855 | CIP-008-1 | R1 | Lower | | | X |
| 4/29/2011 | NP11-167-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$89,000 | WECC200901864 | CIP-009-1 | R5 | Lower | | | X |
| 4/29/2011 | NP11-167-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$89,000 | WECC200901851 | CIP-009-1 | R2 | Lower | | | X |
| 4/29/2011 | NP11-174-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$15,000 | RFC201000308 | CIP-004-1 | R4 | Lower | | | X |
| 4/29/2011 | NP11-174-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$15,000 | RFC201000307 | CIP-004-1 | R2 | Lower | | | X |
| 4/29/2011 | NP11-174-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$15,000 | RFC200900232 | CIP-006-1 | R1.8 | Lower | | | X |
| 4/29/2011 | NP11-175-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$32,000 | WECC200901401 | CIP-004-1 | R3 | Lower | | | X |
| 4/29/2011 | NP11-175-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$32,000 | WECC200901400 | CIP-004-1 | R2 | Medium | | | X |
| 4/29/2011 | NP11-175-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$32,000 | WECC200901739 | CIP-006-1 | R1 | Lower | | | X |
| 4/29/2011 | NP11-176-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | WECC200901556 | CIP-004-1 | R2 | Medium | | | X |
| 4/29/2011 | NP11-176-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | WECC200901764 | CIP-004-1 | R3 | Medium | | | X |
| 4/29/2011 | NP11-176-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | WECC200901651 | CIP-004-1 | R4 | Medium | | | X |
| 4/29/2011 | NP11-178-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | WECC200901741 | CIP-002-1 | R1 | Medium | | | X |
| 4/29/2011 | NP11-179-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$10,000 | MRO200900136 | CIP-007-1 | R1 | Medium | | | X |
| 4/29/2011 | NP11-180-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$71,500 | WECC200901707 | CIP-004-1 | R2 | Lower | | | X |
| 4/29/2011 | NP11-180-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$71,500 | WECC200801177 | CIP-004-1 | R3 | Lower | | | X |
| 4/29/2011 | NP11-181-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$23,000 | FRCC201000324 | CIP-004-1 | R2.1 | Lower | | | X |
| 4/29/2011 | NP11-181-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$23,000 | FRCC201000325 | CIP-004-1 | R4.1 | Lower | | | X |
| 4/29/2011 | NP11-181-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$23,000 | FRCC201000337 | CIP-004-1 | R2.3 | Lower | | | X |
| 4/29/2011 | NP11-181-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$23,000 | FRCC201000338 | CIP-004-1 | R3 | Lower | | | X |
| 4/29/2011 | NP11-181-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$7,500 | NPCC201000183 | CIP-004-1 | R3 | Medium | | | X |
| 4/29/2011 | NP11-181-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$7,500 | NPCC201000185 | CIP-004-1 | R4.1; R4.2 | Medium | | | X |
| 4/29/2011 | NP11-181-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$7,500 | NPCC201000186 | CIP-004-1 | R2.1 | Medium | | | X |
| 4/29/2011 | NP11-181-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$2,500 | NPCC201000187 | CIP-004-1 | R4.1; R4.2 | Medium | | | X |
| 4/29/2011 | NP11-181-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$2,500 | NPCC201000188 | CIP-004-1 | R2.1 | Medium | | | X |
| 4/29/2011 | NP11-181-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$2,500 | NPCC201000189 | CIP-004-1 | R3 | Medium | | | X |
| 4/29/2011 | NP11-181-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$23,000 | FRCC201000326 | CIP-005-1 | R4 | Lower | | | X |
| 4/29/2011 | NP11-181-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$23,000 | FRCC201000322 | CIP-006-1 | R3 | Medium | | | X |
| 4/29/2011 | NP11-181-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$23,000 | FRCC201000323 | CIP-006-1 | R4 | Lower | | | X |
| 4/29/2011 | NP11-181-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$7,500 | NPCC201000184 | CIP-006-1 | R1.4 | Medium | | | X |
| 4/29/2011 | NP11-181-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$4,000 | NPCC201000163 | CIP-006-2 | R1.6 | Medium | | | X |
| 4/29/2011 | NP11-181-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$23,000 | FRCC201000328 | CIP-007-1 | R1 | Medium | | | X |
| 4/29/2011 | NP11-181-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$23,000 | FRCC201000329 | CIP-007-1 | R2 | Lower | | | X |
| 4/29/2011 | NP11-181-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$23,000 | FRCC201000330 | CIP-007-1 | R3 | Lower | | | X |
| 4/29/2011 | NP11-181-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$23,000 | FRCC201000331 | CIP-007-1 | R8 | Lower | | | X |
| 4/29/2011 | NP11-181-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$2,500 | NPCC201000158 | CIP-007-1 | R1 | Medium | | | X |
| 4/29/2011 | NP11-181-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$2,500 | NPCC201000157 | CIP-007-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-182-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$59,000 | WECC200901829 | CIP-004-1 | R3 | Medium | | | X |
| 5/26/2011 | NP11-182-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$59,000 | WECC200901836 | CIP-004-1 | R4 | Lower | | | X |
| 5/26/2011 | NP11-182-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$59,000 | WECC200901828 | CIP-004-1 | R2 | Medium | | | X |
| 5/26/2011 | NP11-182-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$59,000 | WECC201001830 | CIP-008-1 | R1 | Lower | | | X |
| 5/26/2011 | NP11-182-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$59,000 | WECC201001831 | CIP-009-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-182-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$59,000 | WECC201001832 | CIP-009-1 | R2 | Lower | | | X |

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|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|------|---|--|----------------------------|------------------------------------|
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC200900208 | CIP-002-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC200900209 | CIP-003-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000347 | CIP-003-1 | R6 | Lower | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000346 | CIP-003-1 | R5 | Lower | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000345 | CIP-003-1 | R4 | Medium | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC200900212 | CIP-004-1 | R4 | Lower | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC200900210 | CIP-004-1 | R2 | Medium | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC200900211 | CIP-004-1 | R3 | Medium | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000348 | CIP-005-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000352 | CIP-005-1 | R5 | Lower | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000350 | CIP-005-1 | R3 | Medium | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000349 | CIP-005-1 | R2 | Medium | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000353 | CIP-006-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000354 | CIP-006-1 | R3 | Medium | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC200900213 | CIP-007-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000357 | CIP-007-1 | R5 | Lower | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000360 | CIP-007-1 | R9 | Lower | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000370 | CIP-007-1 | R6 | Lower | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000356 | CIP-007-1 | R3 | Lower | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000369 | CIP-007-1 | R4 | Medium | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000358 | CIP-007-1 | R7 | Lower | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000355 | CIP-007-1 | R2 | Medium | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC200900214 | CIP-008-1 | R1 | Lower | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000364 | CIP-009-1 | R4 | Lower | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000363 | CIP-009-1 | R3 | Lower | | | X |
| 5/26/2011 | NP11-184-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC200900215 | CIP-009-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-188-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$16,860 | SPP200900165 | CIP-003-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-188-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$16,860 | SPP200900086 | CIP-004-1 | R4 | Medium | | | X |
| 5/26/2011 | NP11-188-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$16,860 | SPP200900166 | CIP-004-1 | R3.2 | Lower | | | X |
| 5/26/2011 | NP11-189-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$17,000 | FRCC200900278 | CIP-004-1 | R2.1 | Medium | | | X |
| 5/26/2011 | NP11-189-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$17,000 | FRCC200900217 | CIP-004-1 | R3 | Medium | | | X |
| 5/26/2011 | NP11-189-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$17,000 | FRCC201000383 | CIP-004-2 | R3 | Medium | | | X |
| 5/26/2011 | NP11-189-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$17,000 | FRCC200900277 | CIP-005-1 | R1.4 | Lower | | | X |
| 5/26/2011 | NP11-189-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$17,000 | FRCC201000384 | CIP-005-1 | R1 | Lower | | | X |
| 5/26/2011 | NP11-192-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$12,200 | WECC201002154 | CIP-004-1 | R4 | Medium | | | X |
| 5/26/2011 | NP11-192-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$12,200 | WECC201002236 | CIP-005-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-192-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$12,200 | WECC201002152 | CIP-006-2 | R1 | Medium | | | X |
| 5/26/2011 | NP11-193-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC201002010 | CIP-003-1 | R1 | Lower | | | X |
| 5/26/2011 | NP11-193-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC201001948 | CIP-004-1 | R3 | Medium | | | X |
| 5/26/2011 | NP11-193-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC201001968 | CIP-007-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-198-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$17,860 | SPP200900178 | CIP-003-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-198-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$17,860 | SPP200900180 | CIP-004-1 | R4.2 | High | | | X |
| 5/26/2011 | NP11-198-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$17,860 | SPP200900181 | CIP-007-1 | R1 | Medium | | | X |
| 5/26/2011 | NP11-199-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC201000727 | CIP-003-2 | R2 | Medium | | | X |
| 5/26/2011 | NP11-199-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201100252 | CIP-004-1 | R2.3 | Lower | | | X |
| 5/26/2011 | NP11-199-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$3,500 | NPCC201000207 | CIP-006-2 | R1.5 | Medium | | | X |
| 5/26/2011 | NP11-199-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$3,500 | NPCC201000208 | CIP-006-2 | R1.5 | Medium | | | X |
| 6/29/2011 | NP11-204-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$37,500 | WECC200901666 | CIP-003-1 | R3 | Lower | | | X |
| 6/29/2011 | NP11-204-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$37,500 | WECC200901690 | CIP-005-1 | R2 | Medium | | | X |
| 6/29/2011 | NP11-204-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$37,500 | WECC200901753 | CIP-006-1 | R1 | Medium | | | X |
| 6/29/2011 | NP11-204-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$37,500 | WECC200901700 | CIP-007-1 | R5 | Lower | | | X |
| 6/29/2011 | NP11-205-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$22,000 | WECC201001913 | CIP-002-1 | R1 | Lower | | | X |
| 6/29/2011 | NP11-205-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$22,000 | WECC201001916 | CIP-003-1 | R1 | Lower | | | X |
| 6/29/2011 | NP11-205-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$22,000 | WECC201001914 | CIP-004-1 | R4 | Lower | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC200900115 | CIP-004-1 | R4 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC201000147 | CIP-004-1 | R2 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC201000149 | CIP-004-1 | R4 | Lower | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC201000150 | CIP-004-1 | R4 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC200900088 | CIP-004-1 | R4 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC200900089 | CIP-004-1 | R4 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC200900103 | CIP-004-1 | R4 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC201000146 | CIP-004-1 | R4 | Lower | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC201000151 | CIP-004-1 | R4 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC200900091 | CIP-004-1 | R4 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC200900090 | CIP-004-1 | R4 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC201000148 | CIP-004-1 | R3 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC201000181 | CIP-004-2 | R4 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC201000182 | CIP-004-2 | R4 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC200900105 | CIP-006-1 | R2 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | NPCC201000152 | CIP-006-1 | R2 | Medium | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------------------|---|--|----------------------------|------------------------------------|
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$80,000 | NPCC200900096 | CIP-006-1 | R2 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$80,000 | NPCC200900104 | CIP-006-1 | R2 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$80,000 | NPCC200900114 | CIP-006-1 | R2 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$80,000 | NPCC200900092 | CIP-006-1 | R2 | Medium | | | X |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$80,000 | NPCC201000156 | CIP-006-2 | R2 | Medium | | | X |
| 6/29/2011 | NP11-211-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$14,000 | WECC200901641 | CIP-001-1 | R2 | Medium | | | X |
| 6/29/2011 | NP11-211-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$14,000 | WECC200901671 | CIP-002-1 | R1 | Lower | | | X |
| 6/29/2011 | NP11-211-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$14,000 | WECC200901672 | CIP-003-1 | R1 | Lower | | | X |
| 6/29/2011 | NP11-211-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$14,000 | WECC200901673 | CIP-004-1 | R4 | Lower | | | X |
| 6/29/2011 | NP11-212-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$381,600 | WECC200902079 | CIP-004-1 | R3 | Medium | | | X |
| 6/29/2011 | NP11-212-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$381,600 | WECC201002288 | CIP-004-1 | R2 | Lower | | | X |
| 6/29/2011 | NP11-212-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$381,600 | WECC201002082 | CIP-005-1 | R2 | Medium | | | X |
| 6/29/2011 | NP11-212-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$381,600 | WECC201002088 | CIP-005-1 | R3 | Medium | | | X |
| 6/29/2011 | NP11-212-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$381,600 | WECC200902081 | CIP-007-1 | R8 | Medium | | | X |
| 6/29/2011 | NP11-212-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$381,600 | WECC201002080 | CIP-007-1 | R2 | Medium | | | X |
| 6/29/2011 | NP11-213-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$143,500 | WECC201001856 | CIP-003-1 | R1 | Medium | | | X |
| 6/29/2011 | NP11-213-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$143,500 | WECC201001857 | CIP-004-1 | R2 | Medium | | | X |
| 6/29/2011 | NP11-213-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$143,500 | WECC201001858 | CIP-004-1 | R3 | Medium | | | X |
| 6/29/2011 | NP11-213-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$143,500 | WECC201001859 | CIP-004-1 | R4 | Lower | | | X |
| 6/29/2011 | NP11-213-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$143,500 | WECC200901774 | CIP-005-1 | R3 | Medium | | | X |
| 6/29/2011 | NP11-213-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$143,500 | WECC200901775 | CIP-007-1 | R6 | Lower | | | X |
| 6/29/2011 | NP11-213-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$143,500 | WECC200901773 | CIP-007-1 | R5 | Lower | | | X |
| 6/29/2011 | NP11-213-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$143,500 | WECC201001860 | CIP-007-1 | R1 | Medium | | | X |
| 6/29/2011 | NP11-213-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$143,500 | WECC201001862 | CIP-009-1 | R2 | Lower | | | X |
| 6/29/2011 | NP11-213-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$143,500 | WECC201001861 | CIP-009-1 | R1 | Medium | | | X |
| 6/29/2011 | NP11-218-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$130,000 | WECC200901499 | CIP-001-1 | R2 | Medium | | | X |
| 6/29/2011 | NP11-218-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$130,000 | WECC200901500 | CIP-001-1 | R3 | Medium | | | X |
| 6/29/2011 | NP11-218-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$130,000 | WECC200901498 | CIP-001-1 | R1 | Medium | | | X |
| 6/29/2011 | NP11-218-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$130,000 | WECC200901595 | CIP-002-1 | R3 | High | | | X |
| 6/29/2011 | NP11-218-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$130,000 | WECC200901594 | CIP-002-1 | R2 | High | | | X |
| 6/29/2011 | NP11-218-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$130,000 | WECC200901597 | CIP-003-1 | R4 | Lower | | | X |
| 6/29/2011 | NP11-218-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$130,000 | WECC200901596 | CIP-003-1 | R1 | Lower | | | X |
| 6/29/2011 | NP11-218-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$130,000 | WECC200901555 | CIP-004-1 | R4 | Medium | | | X |
| 6/29/2011 | NP11-218-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$130,000 | WECC200901489 | CIP-004-1 | R3 | Lower | | | X |
| 6/29/2011 | NP11-218-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$130,000 | WECC200901722 | CIP-004-1 | R3 | Lower | | | X |
| 6/29/2011 | NP11-218-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$130,000 | WECC200901868 | CIP-006-1 | R4 | Lower | | | X |
| 6/29/2011 | NP11-218-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$130,000 | WECC200901867 | CIP-006-1 | R2 | Medium | | | X |
| 6/29/2011 | NP11-218-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$130,000 | WECC200901490 | CIP-007-1 | R1 | Lower | | | X |
| 6/29/2011 | NP11-223-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | SPP200900149 | CIP-003-1 | R1 | Lower | | | X |
| 6/29/2011 | NP11-225-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | RFC201000385 | CIP-002-1 | R2 | High | | | X |
| 6/29/2011 | NP11-225-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | RFC201000386 | CIP-003-1 | R1 | Medium | | | X |
| 6/29/2011 | NP11-225-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | RFC201000303 | CIP-007-1 | R6 | Lower | | | X |
| 6/29/2011 | NP11-226-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | RFC201000240 | CIP-004-1 | R4.2 | Medium | | | X |
| 6/29/2011 | NP11-226-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | RFC201000234 | CIP-004-1 | R4.2 | Medium | | | X |
| 6/29/2011 | NP11-226-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | RFC201000432 | CIP-006-1 | R1.8 | Lower | | | X |
| 6/29/2011 | NP11-226-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | RFC201000295 | CIP-006-1 | R3 | Medium | | | X |
| 6/29/2011 | NP11-226-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | RFC201000241 | CIP-006-1 | R1.2 | Medium | | | X |
| 6/29/2011 | NP11-226-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | RFC201000659 | CIP-006-2 | R5 | Medium | | | X |
| 6/29/2011 | NP11-226-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | RFC201000660 | CIP-006-2 | R6 | Lower | | | X |
| 6/29/2011 | NP11-226-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | RFC201000658 | CIP-006-2 | R4 | Medium | | | X |
| 6/29/2011 | NP11-226-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | RFC201000683 | CIP-006-3c | R6 | Lower | | | X |
| 6/29/2011 | NP11-226-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | RFC201000682 | CIP-006-3c | R5 | Medium | | | X |
| 6/29/2011 | NP11-226-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | RFC201000681 | CIP-006-3c | R4 | Medium | | | X |
| 6/29/2011 | NP11-226-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | RFC201000435 | CIP-007-1 | R6 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC201000531 | CIP-003-1 | R5.2; R5.3 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC201000573 | CIP-003-1 | R5.2; R5.3 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC201000552 | CIP-003-1 | R5.2; R5.3 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$4,000 | SPP200900186 | CIP-004-1 | R2 (R2.2, R2.2.1 - R2.2.4) | Lower | | | X |
| 6/30/2011 | NP11-228-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$700 | SPP200900188 | CIP-004-1 | R4 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC201000558 | CIP-005-1 | R4 | Medium | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC201000537 | CIP-005-1 | R4 | Medium | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC201000579 | CIP-005-1 | R4 | Medium | | | X |
| 6/30/2011 | NP11-228-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$0 | SPP200900110 | CIP-006-1 | R3 (R3.1, R3.2) | Medium | | | X |
| 6/30/2011 | NP11-228-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$3,000 | SPP200900190 | CIP-007-1 | R1 (R1.1 - R1.3) | Medium | | | X |
| 6/30/2011 | NP11-228-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$3,000 | SPP200900191 | CIP-007-1 | R5.2.3 | Medium | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC201000566 | CIP-007-1 | R8 | Lower | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|-----------|---|--|----------------------------|------------------------------------|
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000545 | CIP-007-1 | R8 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000587 | CIP-007-1 | R8 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000567 | CIP-007-1 | R9 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000546 | CIP-007-1 | R9 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000588 | CIP-007-1 | R9 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$0 | SPP201000290 | CIP-008-1 | R1 (R1.6) | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000568 | CIP-008-1 | R1.6 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000547 | CIP-008-1 | R1.6 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000589 | CIP-008-1 | R1.6 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$0 | SPP201000291 | CIP-009-1 | R2 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000569 | CIP-009-1 | R2 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000548 | CIP-009-1 | R2 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000590 | CIP-009-1 | R2 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000571 | CIP-009-1 | R5 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000550 | CIP-009-1 | R5 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000592 | CIP-009-1 | R5 | Lower | | | X |
| 6/30/2011 | NP11-228-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$3,000 | SPP200900193 | CIP-009-1 | R1, R1.1 | Medium | | | X |
| 7/28/2011 | NP11-229-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | WECC201001844 | CIP-002-1 | R3 | High | | | X |
| 7/28/2011 | NP11-229-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | WECC201001843 | CIP-002-1 | R1 | Medium | | | X |
| 7/28/2011 | NP11-229-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | WECC201001847 | CIP-003-1 | R3 | Lower | | | X |
| 7/28/2011 | NP11-229-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | WECC201001846 | CIP-003-1 | R2 | Medium | | | X |
| 7/28/2011 | NP11-229-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | WECC201001845 | CIP-003-1 | R1 | Medium | | | X |
| 7/28/2011 | NP11-229-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | WECC200901818 | CIP-007-1 | R1 | Medium | | | X |
| 7/28/2011 | NP11-229-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | WECC201001874 | CIP-009-1 | R1 | Medium | | | X |
| 7/28/2011 | NP11-230-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$18,000 | RFC201000273 | CIP-005-1 | R2.4 | Medium | | | X |
| 7/28/2011 | NP11-230-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$18,000 | RFC201000274 | CIP-006-1 | R1.1 | Medium | | | X |
| 7/28/2011 | NP11-230-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$18,000 | RFC201000277 | CIP-007-1 | R5.2.1 | Medium | | | X |
| 7/28/2011 | NP11-230-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$18,000 | RFC201000278 | CIP-007-1 | R5.2.3 | Medium | | | X |
| 7/28/2011 | NP11-233-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$70,000 | WECC201002106 | CIP-006-1 | R3 | Medium | | | X |
| 7/28/2011 | NP11-233-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$70,000 | WECC201002282 | CIP-007-1 | R8 | Medium | | | X |
| 7/28/2011 | NP11-233-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$70,000 | WECC201002155 | CIP-007-1 | R1 | Medium | | | X |
| 7/28/2011 | NP11-234-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | WECC201002083 | CIP-005-1 | R1 | Medium | | | X |
| 7/28/2011 | NP11-234-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | WECC201002085 | CIP-005-1 | R3 | Medium | | | X |
| 7/28/2011 | NP11-234-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | WECC201002077 | CIP-007-1 | R3 | Lower | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000595 | CIP-004-1 | R4.2 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000601 | CIP-004-1 | R4.2 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201100726 | CIP-004-2 | R2 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000594 | CIP-004-2 | R2.1 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201100729 | CIP-004-2 | R2 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201100728 | CIP-004-2 | R4 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201100727 | CIP-004-2 | R3 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201100730 | CIP-004-2 | R3 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201100731 | CIP-004-2 | R4 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000600 | CIP-004-2 | R2.1 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201100732 | CIP-004-3 | R3 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000596 | CIP-005-1 | R1 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000602 | CIP-005-1 | R1 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000229 | CIP-005-1 | R2 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000230 | CIP-005-1 | R3 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000226 | CIP-005-1 | R2 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000227 | CIP-005-1 | R3 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000228 | CIP-006-1 | R1.1 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000231 | CIP-006-1 | R1.1 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000603 | CIP-006-2 | R1 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000597 | CIP-006-2 | R1 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000425 | CIP-007-1 | R6 | Lower | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000599 | CIP-007-1 | R3.1 | Lower | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000424 | CIP-007-1 | R6 | Lower | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000605 | CIP-007-1 | R3.1 | Lower | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000661 | CIP-007-2 | R5.2.3 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000604 | CIP-007-2a | R1 | Medium | | | X |
| 7/28/2011 | NP11-237-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC201000598 | CIP-007-2a | R1 | Medium | | | X |
| 7/28/2011 | NP11-243-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$20,000 | RFC201000382 | CIP-004-2 | R4 | Lower | | | X |
| 7/28/2011 | NP11-243-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$20,000 | RFC201000381 | CIP-004-2 | R3 | Medium | | | X |
| 7/28/2011 | NP11-243-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$20,000 | RFC201000380 | CIP-004-2 | R2.1 | Medium | | | X |
| 7/28/2011 | NP11-247-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$15,000 | RFC201000678 | CIP-004-1 | R4 | Lower | | | |
| 7/28/2011 | NP11-247-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$15,000 | RFC201000378 | CIP-005-1 | R2.6 | Lower | | | |
| 7/28/2011 | NP11-247-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$15,000 | RFC201000332 | CIP-006-1 | R5 | Lower | | | |
| 7/28/2011 | NP11-247-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$15,000 | RFC201000679 | CIP-006-1 | R5 | Lower | | | |
| 7/28/2011 | NP11-247-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$15,000 | RFC201000680 | CIP-006-1 | R3 | Medium | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|-----------------|---|--|----------------------------|------------------------------------|
| 7/28/2011 | NP11-248-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | WECC200902055 | CIP-007-1 | R3.1 | Lower | | | X |
| 7/28/2011 | NP11-249-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$18,000 | WECC201002230 | CIP-006-1 | R1.1 | Medium | | | X |
| 7/28/2011 | NP11-249-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$18,000 | WECC201002233 | CIP-007-1 | R4 | Lower | | | X |
| 7/28/2011 | NP11-249-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$18,000 | WECC201002232 | CIP-007-1 | R2 | Medium | | | X |
| 7/28/2011 | NP11-249-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$18,000 | WECC201002234 | CIP-007-1 | R5 | Medium | | | X |
| 7/28/2011 | NP11-250-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$12,600 | WECC201002372 | CIP-004-2 | R2 | Medium | | | X |
| 7/28/2011 | NP11-250-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$12,600 | WECC201002283 | CIP-006-1 | R1 | Medium | | | X |
| 7/28/2011 | NP11-251-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$7,000 | WECC201002031 | CIP-006-1 | R1.1 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC201000716 | CIP-002-1 | R1 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC201000697 | CIP-002-1 | R1 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC201000719 | CIP-002-1 | R1 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | NPCC201000215 | CIP-003-1 | R1.2 | Lower | | | X |
| 7/29/2011 | NP11-253-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC201000717 | CIP-003-1 | R2 | Lower | | | X |
| 7/29/2011 | NP11-253-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC201000699 | CIP-003-1 | R2 | Lower | | | X |
| 7/29/2011 | NP11-253-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC201000721 | CIP-003-1 | R2 | Lower | | | X |
| 7/29/2011 | NP11-253-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$14,000 | FRCC200900135 | CIP-004-1 | R3 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201100248 | CIP-004-1 | R4.2 | Lower | | | X |
| 7/29/2011 | NP11-253-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$14,000 | FRCC200900134 | CIP-004-1 | R2 (R2.1, R2.3) | Medium | | | X |
| 7/29/2011 | NP11-253-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$7,500 | NPCC201000214 | CIP-005-2 | R3.2 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$14,000 | FRCC201000381 | CIP-006-1 | R1.1 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$14,000 | FRCC200900296 | CIP-007-1 | R1 | Medium | | | X |
| 7/29/2011 | NP11-253-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$14,000 | FRCC201000396 | CIP-007-2a | R3.1 | Lower | | | X |
| 7/29/2011 | NP11-253-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$0 | NPCC201100250 | CIP-007-3 | R3 | Lower | | | X |
| 7/29/2011 | NP11-253-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$0 | NPCC201100251 | CIP-007-3 | R4 | Lower | | | X |
| 7/29/2011 | NP11-253-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201100277 | CIP-008-2 | R1 | Lower | | | X |
| 8/3/2011 | NP11-261-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC200900279 | CIP-002-1 | R3.1 | Lower | | | X |
| 8/3/2011 | NP11-261-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000648 | CIP-003-1 | R5 | Lower | | | X |
| 8/3/2011 | NP11-261-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000650 | CIP-004-1 | R3 | Medium | | | X |
| 8/3/2011 | NP11-261-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000649 | CIP-004-1 | R2.1 | Medium | | | X |
| 8/3/2011 | NP11-261-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000280 | CIP-004-1 | R4.2 | Medium | | | X |
| 8/3/2011 | NP11-261-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000379 | CIP-006-1 | R1 | Medium | | | X |
| 8/3/2011 | NP11-261-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000371 | CIP-006-1 | R2 | Medium | | | X |
| 8/3/2011 | NP11-261-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$70,000 | RFC201000615 | CIP-007-1 | R6.3 | Medium | | | X |
| 8/3/2011 | NP11-262-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000269 | CIP-002-1 | R1 | Lower | | | X |
| 8/3/2011 | NP11-262-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000270 | CIP-002-1 | R3 | Lower | | | X |
| 8/3/2011 | NP11-262-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000273 | CIP-003-1 | R1 | Medium | | | X |
| 8/3/2011 | NP11-262-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000275 | CIP-004-2 | R2 | Lower | | | X |
| 8/3/2011 | NP11-262-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000276 | CIP-007-1 | R1 | Medium | | | X |
| 8/3/2011 | NP11-263-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$11,000 | TREXXXXXX320 | CIP-002-1 | R3 | High | | | X |
| 8/3/2011 | NP11-263-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$11,000 | TREXXXXXX079 | CIP-004-1 | R3 | Medium | | | X |
| 8/3/2011 | NP11-263-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$11,000 | TREXXXXXX080 | CIP-004-1 | R4 | Lower | | | X |
| 8/3/2011 | NP11-263-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$11,000 | TREXXXXXX321 | CIP-004-1 | R2.2.4 | Lower | | | X |
| 8/3/2011 | NP11-263-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$11,000 | TREXXXXXX067 | CIP-007-1 | R1 | Medium | | | X |
| 8/3/2011 | NP11-264-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$8,000 | SPP200900146 | CIP-002-1 | R1 | Lower | | | X |
| 8/3/2011 | NP11-264-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$8,000 | SPP201000309 | CIP-002-1 | R3 | High | | | X |
| 8/3/2011 | NP11-264-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$8,000 | SPP201000310 | CIP-003-1 | R1 | Medium | | | X |
| 8/3/2011 | NP11-264-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$8,000 | SPP201000313 | CIP-004-1 | R4 | Lower | | | X |
| 8/3/2011 | NP11-264-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$8,000 | SPP201000312 | CIP-004-1 | R3 | Medium | | | X |
| 8/3/2011 | NP11-264-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$8,000 | SPP201000311 | CIP-004-1 | R2 | Medium | | | X |
| 8/3/2011 | NP11-264-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$8,000 | SPP201000314 | CIP-007-1 | R5 | Medium | | | X |
| 8/3/2011 | NP11-264-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$8,000 | SPP201000315 | CIP-008-1 | R1 | Lower | | | X |
| 8/3/2011 | NP11-264-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$8,000 | SPP201000316 | CIP-009-1 | R2 | Lower | | | X |
| 8/3/2011 | NP11-266-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | FRCC201000350 | CIP-002-1 | R3 | High | | | X |
| 8/3/2011 | NP11-266-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC201100765 | CIP-002-1 | R1 | Medium | | | X |
| 8/3/2011 | NP11-266-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | FRCC201000351 | CIP-003-1 | R1.2 | Lower | | | X |
| 8/3/2011 | NP11-266-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | FRCC201000393 | CIP-003-1 | R1.2 | Lower | | | X |
| 8/3/2011 | NP11-266-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SPP200900152 | CIP-003-1 | R1.1 | Lower | | | X |
| 8/3/2011 | NP11-266-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | RFC200900323 | CIP-003-1 | R1.1 | Lower | | | X |
| 8/3/2011 | NP11-266-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SPP200900153 | CIP-003-1 | R2 | Medium | | | X |
| 8/3/2011 | NP11-266-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | RFC200900324 | CIP-003-1 | R2 | Medium | | | X |
| 8/3/2011 | NP11-266-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC201000726 | CIP-003-1 | R2 | Medium | | | X |
| 8/3/2011 | NP11-266-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | FRCC200900245 | CIP-004-1 | R4 | Lower | | | X |
| 8/3/2011 | NP11-266-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | FRCC200900298 | CIP-004-1 | R2.1 | Medium (NERC database states R2 Lower) | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|----------------------------------|--|---|-------------------|----------------------|-----------------|---|--|----------------------------|------------------------------------|
| 8/31/2011 | NP11-266-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | FRCC200900299 | CIP-004-1 | R3 | Medium | | | X |
| 8/31/2011 | NP11-266-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SPP200900154 | CIP-004-1 | R2.2 | Medium | | | X |
| 8/31/2011 | NP11-266-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | RFC200900325 | CIP-004-1 | R2.2 | Medium | | | X |
| 8/31/2011 | NP11-266-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SPP200900155 | CIP-004-1 | R4.1 | Lower | | | X |
| 8/31/2011 | NP11-266-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | RFC200900326 | CIP-004-1 | R4.1 | Lower | | | X |
| 8/31/2011 | NP11-266-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$3,500 | NPCC201100245 | CIP-004-3 | R4.2 | Medium | | | X |
| 8/31/2011 | NP11-266-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | FRCC200900265 | CIP-005-1 | R2.1 | Medium | | | X |
| 8/31/2011 | NP11-266-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | FRCC200900300 | CIP-006-1 | R1.8 | Lower | | | X |
| 8/31/2011 | NP11-266-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$6,000 | NPCC201000169 | CIP-006-1 | R1.6 | Medium | | | X |
| 8/31/2011 | NP11-266-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$6,000 | SPP200900136 | CIP-006-1 | R1.6 | Medium | | | X |
| 8/31/2011 | NP11-266-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | FRCC200900301 | CIP-007-1 | R1.1 | Medium | | | X |
| 8/31/2011 | NP11-266-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | FRCC200900302 | CIP-007-1 | R2.1 | Medium | | | X |
| 8/31/2011 | NP11-266-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$6,000 | NPCC201000170 | CIP-007-2a | R3.1 | Lower | | | X |
| 8/31/2011 | NP11-266-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$6,000 | NPCC201000171 | CIP-007-2a | R5 | Lower | | | X |
| 8/31/2011 | NP11-266-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$6,000 | NPCC201000172 | CIP-007-2a | R7.2 | Lower | | | X |
| 8/31/2011 | NP11-266-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SPP200900157 | CIP-008-1 | R1 (R1.1, R1.4) | Lower | | | X |
| 8/31/2011 | NP11-266-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | RFC200900328 | CIP-008-1 | R1 (R1.1, R1.4) | Lower | | | X |
| 8/31/2011 | NP11-266-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SPP200900158 | CIP-009-1 | R1.1 | Medium | | | X |
| 8/31/2011 | NP11-266-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | RFC200900329 | CIP-009-1 | R1.1 | Medium | | | X |
| 8/31/2011 | NP11-266-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SPP200900159 | CIP-009-1 | R2 | Lower | | | X |
| 8/31/2011 | NP11-266-000 | SPP RE, RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | RFC200900330 | CIP-009-1 | R2 | Lower | | | X |
| 9/30/2011 | NP11-269-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | WECC201001965 | CIP-003-1 | R1 | Lower | | | X |
| 9/30/2011 | NP11-269-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | WECC201001966 | CIP-004-1 | R2; R2.3 | Lower | | | X |
| 9/30/2011 | NP11-269-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | WECC201001967 | CIP-004-1 | R4 | Lower | | | X |
| 9/30/2011 | NP11-269-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | WECC201001964 | CIP-007-1 | R1 | Medium | | | X |
| 9/30/2011 | NP11-269-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | WECC201002011 | CIP-007-1 | R2 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$90,000 | WECC201001887 | CIP-001-1 | R1 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$90,000 | WECC201001888 | CIP-001-1 | R2 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$90,000 | WECC201001889 | CIP-001-1 | R3 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$90,000 | WECC201001890 | CIP-001-1 | R4 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$16,500 | RFC201000395 | CIP-002-1 | R3 | High | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$90,000 | WECC201002056 | CIP-002-1 | R1 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$90,000 | WECC201002057 | CIP-002-1 | R2 | High | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$90,000 | WECC201002058 | CIP-002-1 | R3 | High | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$90,000 | WECC201002059 | CIP-002-1 | R4 | Lower | | | X |
| 9/30/2011 | NP11-270-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$30,000 | RFC201000393 | CIP-004-1 | R4; R4.2 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$30,000 | RFC201000773 | CIP-004-1 | R3 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$1,000 | RFC201000689 | CIP-004-2 | R4 (R4.1) | Lower | | | X |
| 9/30/2011 | NP11-270-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$30,000 | RFC201000692 | CIP-005-1 | R3; R3.2 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$6,000 | RFC201000457 | CIP-005-1 | R3 (R3.2) | Medium | | | X |
| 9/30/2011 | NP11-270-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$30,000 | RFC201100752 | CIP-006-1 | R1; R1.4; R1.7 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$30,000 | RFC201000394 | CIP-006-1 | R2 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$20,400 | WECC201002367 | CIP-006-1 | R1 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$20,400 | WECC201002323 | CIP-006-1 | R6 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$30,000 | RFC201000693 | CIP-007-1 | R2; R2.1; R2.2 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$30,000 | RFC201000694 | CIP-007-1 | R5 | Lower | | | X |
| 9/30/2011 | NP11-270-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$20,400 | WECC201002324 | CIP-007-1 | R5 | Lower | | | X |
| 9/30/2011 | NP11-270-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$16,500 | RFC201000398 | CIP-007-1 | R1 | Medium | | | X |
| 9/30/2011 | NP11-270-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$16,500 | RFC201000399 | CIP-008-1 | R1.6 | Lower | | | X |
| 9/30/2011 | NP11-270-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$30,000 | RFC201100753 | CIP-008-2 | R1 | Lower | | | X |
| 9/30/2011 | NP11-270-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$30,000 | RFC201100754 | CIP-009-1 | R1 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000572 | CIP-003-1 | R4 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000530 | CIP-003-1 | R4 | Medium | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|----------------------------------|--|---|-------------------|----------------------|-----|---|--|----------------------------|------------------------------------|
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000551 | CIP-003-1 | R4 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000575 | CIP-004-1 | R4 | Lower | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000533 | CIP-004-1 | R4 | Lower | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000554 | CIP-004-1 | R4 | Lower | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000538 | CIP-005-1 | R5 | Lower | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000576 | CIP-005-1 | R1 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000577 | CIP-005-1 | R2 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000578 | CIP-005-1 | R3 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000580 | CIP-005-1 | R5 | Lower | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000534 | CIP-005-1 | R1 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000559 | CIP-005-1 | R5 | Lower | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000557 | CIP-005-1 | R3 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000535 | CIP-005-1 | R2 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000555 | CIP-005-1 | R1 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000536 | CIP-005-1 | R3 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000556 | CIP-005-1 | R2 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000581 | CIP-007-1 | R1 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000583 | CIP-007-1 | R3 | Lower | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000585 | CIP-007-1 | R5 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000586 | CIP-007-1 | R6 | Lower | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000565 | CIP-007-1 | R6 | Lower | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000563 | CIP-007-1 | R4 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000562 | CIP-007-1 | R3 | Lower | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|----------------------------------|--|---|-------------------|----------------------|----------------|---|--|----------------------------|------------------------------------|
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000560 | CIP-007-1 | R1 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000544 | CIP-007-1 | R6 | Lower | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000543 | CIP-007-1 | R5 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000541 | CIP-007-1 | R3 | Lower | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000539 | CIP-007-1 | R1 | Medium | | | X |
| 10/31/2011 | NP12-1-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$275,000 | RFC201000564 | CIP-007-1 | R5 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | FRCC201000314 | CIP-002-1 | R3 | High | | | X |
| 10/31/2011 | NP12-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$27,000 | WECC201002191 | CIP-002-1 | R2 | High | | | X |
| 10/31/2011 | NP12-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$27,000 | WECC201002192 | CIP-002-1 | R4 | Lower | | | X |
| 10/31/2011 | NP12-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$27,000 | WECC201002371 | CIP-003-1 | R2 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$27,000 | WECC201002351 | CIP-003-2 | R1 | Lower | | | X |
| 10/31/2011 | NP12-2-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | FRCC201100415 | CIP-004-1 | R2; R2.1 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$27,000 | WECC201002368 | CIP-004-1 | R2 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$17,000 | RFC201000438 | CIP-004-1 | R4 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$17,000 | RFC201000437 | CIP-004-2 | R2.1 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | FRCC200900254 | CIP-005-1 | R2; R2.6 | Lower | | | X |
| 10/31/2011 | NP12-2-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | FRCC200900317 | CIP-005-1 | R1 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | FRCC201000386 | CIP-005-1 | R2; R2.1; R2.2 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$37,000 | WECC200902018 | CIP-005-1 | R1; R1.5 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | FRCC201000315 | CIP-006-1 | R2 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$35,000 | RFC201100861 | CIP-006-2 | R2 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$35,000 | RFC201100821 | CIP-006-3c | R5 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$35,000 | RFC201100860 | CIP-006-3c | R1 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$35,000 | RFC201100862 | CIP-006-3c | R6 | Lower | | | X |
| 10/31/2011 | NP12-2-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$5,000 | RFC201000696 | CIP-006-3c | R1 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | FRCC201000382 | CIP-007-1 | R5; R5.3 | Lower | | | X |
| 10/31/2011 | NP12-2-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | FRCC201000387 | CIP-007-1 | R2 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | FRCC201000388 | CIP-007-1 | R5; R5.2 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | FRCC201000389 | CIP-007-1 | R6; R6.2; R6.5 | Lower | | | X |
| 10/31/2011 | NP12-2-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | FRCC201000410 | CIP-007-1 | R5 | Lower | | | X |
| 10/31/2011 | NP12-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$8,200 | WECC201102640 | CIP-007-1 | R5 | Lower | | | X |
| 10/31/2011 | NP12-2-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201000197 | CIP-007-1 | R2 | Medium | | | X |
| 10/31/2011 | NP12-2-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$35,000 | RFC201100859 | CIP-007-3 | R5 | Lower | | | X |
| 11/30/2011 | NP12-3-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$125,000 | WECC201002087 | CIP-003-1 | R5 | Lower | | | X |
| 11/30/2011 | NP12-3-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$125,000 | WECC201002086 | CIP-003-1 | R4 | Medium | | | X |
| 11/30/2011 | NP12-3-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$125,000 | WECC201002240 | CIP-006-1 | R1 | Medium | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002092 | CIP-002-1 | R3 | High | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002091 | CIP-002-1 | R2 | High | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002090 | CIP-002-1 | R1 | Lower | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002093 | CIP-003-1 | R1 | Lower | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002094 | CIP-003-1 | R4 | Medium | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002098 | CIP-004-1 | R4 | Medium | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002097 | CIP-004-1 | R3 | Medium | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002096 | CIP-004-1 | R2 | Lower | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002101 | CIP-005-1 | R3 | Medium | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002099 | CIP-005-1 | R1 | Medium | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002100 | CIP-005-1 | R2 | Medium | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002102 | CIP-005-1 | R4 | Medium | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002073 | CIP-006-1 | R2 | Medium | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002105 | CIP-007-1 | R5 | Medium | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002104 | CIP-007-1 | R4 | Medium | | | X |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC201002103 | CIP-007-1 | R2 | Medium | | | X |
| 11/30/2011 | NP12-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$40,000 | RFC201000639 | CIP-004-1 | R4; R4.2 | Medium | | | X |
| 11/30/2011 | NP12-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$18,200 | WECC200901949 | CIP-004-1 | R3 | Lower | | | X |
| 11/30/2011 | NP12-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$18,200 | WECC201002064 | CIP-004-2 | R2 | Lower | | | X |
| 11/30/2011 | NP12-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC201100823 | CIP-004-3 | R4 | Lower | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------------------|---|--|----------------------------|------------------------------------|
| 11/30/2011 | NP12-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC201100825 | CIP-004-3 | R2 | Medium | | | X |
| 11/30/2011 | NP12-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC201100826 | CIP-004-3 | R3 | Medium | | | X |
| 11/30/2011 | NP12-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC201100824 | CIP-005-1 | R1 | Medium | | | X |
| 11/30/2011 | NP12-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC201100827 | CIP-005-1 | R1 | Medium | | | X |
| 11/30/2011 | NP12-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$40,000 | RFC201000634 | CIP-006-1 | R4 | Lower | | | X |
| 11/30/2011 | NP12-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$40,000 | RFC201000635 | CIP-006-1 | R1; R1.6 | Medium | | | X |
| 11/30/2011 | NP12-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$18,200 | WECC201002009 | CIP-006-1 | R1 | Lower | | | X |
| 11/30/2011 | NP12-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$6,000 | WECC201002433 | CIP-006-2 | R1 | Medium | | | X |
| 11/30/2011 | NP12-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$6,000 | WECC201002907 | CIP-006-2 | R6 | Lower | | | X |
| 11/30/2011 | NP12-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC201100858 | CIP-006-3c | R1 | Medium | | | X |
| 11/30/2011 | NP12-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$40,000 | RFC201000633 | CIP-007-1 | R1 | Medium | | | X |
| 11/30/2011 | NP12-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$6,000 | WECC201002418 | CIP-007-1 | R4 | Medium | | | X |
| 11/30/2011 | NP12-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$6,000 | WECC201002419 | CIP-007-1 | R5 | Lower | | | X |
| 11/30/2011 | NP12-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$6,000 | WECC201002443 | CIP-007-2a | R3 | Lower | | | X |
| 11/30/2011 | NP12-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$6,000 | WECC201002442 | CIP-007-2a | R5 | Lower | | | X |
| 12/30/2011 | NP12-10-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP201000288 | CIP-003-1 | R1.1 | Lower | | | X |
| 12/30/2011 | NP12-10-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$15,000 | NPCC201100223 | CIP-004-1 | R4 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | NPCC201100225 | CIP-004-1 | R4 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP201000394 | CIP-005-1 | R1.5 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP201000395 | CIP-005-1 | R2 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP201000396 | CIP-005-1 | R3 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP201000397 | CIP-005-1 | R4 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | TRE201000130 | CIP-005-1 | R2; R2.2 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | TRE201000132 | CIP-005-1 | R2; R2.2 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | TRE201000131 | CIP-005-1 | R4; R4.1; R4.2; R4.4; R4.5 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | TRE201000133 | CIP-005-1 | R4; R4.1; R4.2; R4.4; R4.5 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$15,000 | NPCC201100224 | CIP-006-1 | R1 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$5,600 | WECC201102598 | CIP-006-1 | R1; R1.8 | Lower | | | X |
| 12/30/2011 | NP12-10-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | NPCC201100226 | CIP-006-1 | R1 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP201000289 | CIP-007-1 | R1.3 | Lower | | | X |
| 12/30/2011 | NP12-10-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP201000399 | CIP-007-1 | R2 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP201000400 | CIP-007-1 | R3 | Lower | | | X |
| 12/30/2011 | NP12-10-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP201000401 | CIP-007-1 | R5 | Lower | | | X |
| 12/30/2011 | NP12-10-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP201000402 | CIP-007-1 | R6 | Lower | | | X |
| 12/30/2011 | NP12-10-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP201000403 | CIP-007-1 | R8 | Lower | | | X |
| 12/30/2011 | NP12-10-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP201000404 | CIP-007-1 | R9 | Lower | | | X |
| 12/30/2011 | NP12-10-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | TRE201000227 | CIP-007-1 | R2; R2.1; R2.2; R2.3 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | TRE201000233 | CIP-007-1 | R2; R2.1; R2.2; R2.3 | Medium | | | X |
| 12/30/2011 | NP12-10-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | TRE201000230 | CIP-007-1 | R6; R6.2 | Lower | | | X |
| 12/30/2011 | NP12-10-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | TRE201000236 | CIP-007-1 | R6; R6.2 | Lower | | | X |
| 12/30/2011 | NP12-10-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | TRE201000232 | CIP-007-1 | R8; R8.1; R8.2; R8.3; R8.4 | Lower | | | X |
| 12/30/2011 | NP12-10-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | TRE201000238 | CIP-007-1 | R8; R8.1; R8.2; R8.3; R8.4 | Lower | | | X |
| 12/30/2011 | NP12-10-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX, NCRXXXXX | \$6,000 | RFC201000391 | CIP-006-2 | R1; R1.6 | Medium | | | X |
| 12/30/2011 | NP12-9-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$60,000 | RFC200900298 | CIP-004-1 | R4 | Lower | | | X |
| 1/31/2012 | NP12-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$135,000 | WECC201001880 | CIP-002-1 | R1 | Medium | | | X |
| 1/31/2012 | NP12-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$135,000 | WECC201001881 | CIP-002-1 | R3 | High | | | X |
| 1/31/2012 | NP12-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$135,000 | WECC200902072 | CIP-003-1 | R5 | Lower | | | X |
| 1/31/2012 | NP12-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$135,000 | WECC200902070 | CIP-004-1 | R4 | Medium | | | X |
| 1/31/2012 | NP12-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$135,000 | WECC201002084 | CIP-005-1 | R2 | Medium | | | X |
| 1/31/2012 | NP12-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$135,000 | WECC201002089 | CIP-006-1 | R2 | Medium | | | X |
| 1/31/2012 | NP12-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$135,000 | WECC201002119 | CIP-006-2 | R1 | Medium | | | X |
| 1/31/2012 | NP12-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$135,000 | WECC201002113 | CIP-006-2 | R2 | Medium | | | X |
| 1/31/2012 | NP12-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$135,000 | WECC201002066 | CIP-007-1 | R6 | Medium | | | X |
| 1/31/2012 | NP12-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$135,000 | WECC201002060 | CIP-007-1 | R2 | Medium | | | X |
| 1/31/2012 | NP12-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$135,000 | WECC201002067 | CIP-007-1 | R3 | Lower | | | X |
| 1/31/2012 | NP12-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$135,000 | WECC201002061 | CIP-007-1 | R5 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$9,000 | TRE201000136 | CIP-003-1 | R1; R1.2 | Lower | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|------------------|---|--|----------------------------|------------------------------------|
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC201002391 | CIP-003-1 | R1 | Medium | | | X |
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC201002393 | CIP-003-1 | R6 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC201002392 | CIP-003-2 | R5 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC201002296 | CIP-004-1 | R2; R2.3 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC201002394 | CIP-004-1 | R4 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$15,000 | RFC201000440 | CIP-004-1 | R4; R4.1; R4.2 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$15,000 | RFC201000441 | CIP-004-1 | R4; R4.1; R4.2 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$15,000 | RFC201000442 | CIP-004-1 | R4; R4.1; R4.2 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$7,500 | RFC201000646 | CIP-004-1 | R4 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$7,500 | RFC2011001073 | CIP-004-1 | R3 | Medium | | | X |
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | WECC201102807 | CIP-004-1 | R2.1; R2.3 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC201000305 | CIP-004-1 | R2; R2.1.3; R2.3 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC201000662 | CIP-004-1 | R3; R3.2 | Medium | | | X |
| 1/31/2012 | NP12-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC201000306 | CIP-004-1 | R4; R4.1; R4.2 | Medium | | | X |
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC201002399 | CIP-005-1 | R1; R1.5 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC201002397 | CIP-006-1 | R1; R1.8 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | WECC20100599 | CIP-006-1 | R1.8 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC201002395 | CIP-007-1 | R5; R5.1.3 | Medium | | | X |
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | WECC201102609 | CIP-007-1 | R3.1 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$4,000 | MRO201100260 | CIP-007-1 | R1 | Medium | | | X |
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | WECC201102606 | CIP-007-1 | R6 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC201100774 | CIP-007-2 | R4 | Medium | | | X |
| 1/31/2012 | NP12-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC201100775 | CIP-007-2 | R5; R5.3 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | WECC20112613 | CIP-007-3 | R8 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC201100999 | CIP-007-3 | R6; R6.4; R6.5 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC201002294 | CIP-007-1 | R1 | Medium | | | X |
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC201002295 | CIP-007-1 | R3 | Lower | | | X |
| 1/31/2012 | NP12-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC201002396 | CIP-008-1 | R1 | Lower | | | X |
| 2/29/2012 | NP12-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | WECC201002197 | CIP-004-1 | R4 | Medium | | | X |
| 2/29/2012 | NP12-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | WECC201002195 | CIP-004-1 | R2 | Medium | | | X |
| 2/29/2012 | NP12-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$80,000 | WECC201002196 | CIP-004-1 | R3 | Medium | | | X |
| 2/29/2012 | NP12-17-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | SPP201000222 | CIP-002-1 | R3.1 | Lower | | | X |
| 2/29/2012 | NP12-17-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | SPP200900135 | CIP-002-1 | R1.1 | Lower | | | X |
| 2/29/2012 | NP12-17-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | SPP201000223 | CIP-003-1 | R1; R1.1 | Lower | | | X |
| 2/29/2012 | NP12-17-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | SPP201000224 | CIP-003-1 | R3 | Lower | | | X |
| 2/29/2012 | NP12-17-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | SPP201000219 | CIP-003-1 | R4.2 | Lower | | | X |
| 2/29/2012 | NP12-17-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | SPP201000226 | CIP-004-1 | R3 | Medium | | | X |
| 2/29/2012 | NP12-17-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | SPP201000225 | CIP-004-1 | R2 | Lower | | | X |
| 2/29/2012 | NP12-17-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | SPP201000227 | CIP-004-1 | R4 | Lower | | | X |
| 2/29/2012 | NP12-17-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | SPP201000220 | CIP-006-1 | R1.1 | Medium | | | X |
| 2/29/2012 | NP12-17-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | SPP201000228 | CIP-007-1 | R1 | Medium | | | X |
| 2/29/2012 | NP12-17-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | SPP201000221 | CIP-007-1 | R4 | Medium | | | X |
| 2/29/2012 | NP12-17-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | SPP201000229 | CIP-007-1 | R5.2.3 | Medium | | | X |
| 2/29/2012 | NP12-17-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | SPP201000231 | CIP-009-1 | R2.5 | Lower | | | X |
| 2/29/2012 | NP12-17-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | SPP201000230 | CIP-009-1 | R1.2 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | FRCC201000306 | CIP-003-1 | R6 | Lower | | | X |
| 2/29/2012 | NP12-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$65,000 | RFC201100830 | CIP-004-1 | R2; R2.1; R2.3 | Medium, Lower | | | X |
| 2/29/2012 | NP12-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$65,000 | RFC201100831 | CIP-004-1 | R3; R3.1; R3.3 | Lower | | | X |
| 2/29/2012 | NP12-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$65,000 | RFC201100832 | CIP-004-1 | R4; R4.1; R4.2 | Lower, Medium | | | X |
| 2/29/2012 | NP12-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$20,800 | SPP201000302 | CIP-004-1 | R2.1 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$20,800 | SPP201000303 | CIP-004-1 | R3 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$20,800 | SPP201000304 | CIP-004-1 | R4 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$2,000 | WECC201102661 | CIP-004-1 | R4 | Lower | | | X |
| 2/29/2012 | NP12-18-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$3,800 | NPCC201100249 | CIP-004-2 | R3 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | NPCC201000191 | CIP-005-1 | R2; R2.2 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$55,000 | RFC201100913 | CIP-005-2 | R1; R1.5 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$27,900 | WECC201102641 | CIP-005-3 | R1.5 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$65,000 | RFC201100834 | CIP-006-1 | R2; R2.2 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$65,000 | RFC201100835 | CIP-006-1 | R5 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$27,900 | WECC201102639 | CIP-006-1 | R1.8 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$55,000 | RFC201100915 | CIP-006-2 | R3 | Medium | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|-----------------------------|---|--|----------------------------|------------------------------------|
| 2/29/2012 | NP12-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$55,000 | RFC201100917 | CIP-006-2 | R8 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$55,000 | RFC201100778 | CIP-006-2c | R2; R2.2 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$65,000 | RFC201100833 | CIP-006-3c | R1; R1.6 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$20,800 | SPP201000305 | CIP-007-1 | R1 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | FRCC201000307 | CIP-007-1 | R1; R1.1; R1.2; R1.3 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | FRCC201000362 | CIP-007-1 | R6; R6.1; R6.3; R6.4 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$8,800 | SPP201000330 | CIP-007-1 | R1 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$8,800 | SPP201000334 | CIP-007-1 | R3 | Lower | | | X |
| 2/29/2012 | NP12-18-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | NPCC201000190 | CIP-007-1 | R2; R2.1 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$55,000 | RFC201100918 | CIP-007-2 | R1 | Lower | | | X |
| 2/29/2012 | NP12-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$55,000 | RFC201100919 | CIP-007-2 | R3 | Lower | | | X |
| 2/29/2012 | NP12-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$55,000 | RFC201100920 | CIP-007-2 | R4 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$55,000 | RFC201100779 | CIP-007-2a | R2 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$12,300 | WECC201102518 | CIP-007-3 | R3 | Lower | | | X |
| 2/29/2012 | NP12-18-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$12,300 | WECC201102519 | CIP-007-3 | R4; R4.1; R4.2 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$12,300 | WECC201102520 | CIP-007-3 | R3 | Lower | | | X |
| 2/29/2012 | NP12-18-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$12,300 | WECC201102521 | CIP-007-3 | R4 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$20,800 | SPP201000306 | CIP-008-1 | R1.6 | Lower | | | X |
| 2/29/2012 | NP12-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$8,800 | SPP201000331 | CIP-008-1 | R1; R1.5; R1.6 | Lower | | | X |
| 2/29/2012 | NP12-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$20,800 | SPP201000307 | CIP-009-1 | R1 | Medium | | | X |
| 2/29/2012 | NP12-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$20,800 | SPP201000308 | CIP-009-1 | R2 | Lower | | | X |
| 2/29/2012 | NP12-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$8,800 | SPP201000332 | CIP-009-1 | R1 | Medium | | | X |
| 3/30/2012 | NP12-20-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC201102703 | CIP-001-1 | R1 | Medium | | | X |
| 3/30/2012 | NP12-20-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC201102702 | CIP-001-1 | R2 | Medium | | | X |
| 3/30/2012 | NP12-20-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC201002383 | CIP-002-1 | R1 | Medium | | | X |
| 3/30/2012 | NP12-20-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC201002384 | CIP-002-1 | R2 | High | | | X |
| 3/30/2012 | NP12-20-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC201002385 | CIP-002-1 | R3 | High | | | X |
| 3/30/2012 | NP12-20-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC201002386 | CIP-002-1 | R4 | Lower | | | X |
| 3/30/2012 | NP12-20-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC201102417 | CIP-003-1 | R2 | Medium | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000234 | CIP-002-1 | R2 | High | | | X |
| 3/30/2012 | NP12-22-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | NPCC201000220 | CIP-002-2 | R3 | Medium | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000236 | CIP-003-1 | R1 | Medium | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000441 | CIP-003-1 | R3 | Lower | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000238 | CIP-004-1 | R2; R2.2.1; R2.2.4; R2.3 | Medium | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000239 | CIP-004-1 | R4; R4.2 | Lower | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000345 | CIP-005-1 | R2; R2.2; R2.4 | Medium | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000346 | CIP-005-1 | R3; R3.2 | Medium | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000348 | CIP-005-1 | R5; R5.1 | Lower | | | X |
| 3/30/2012 | NP12-22-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$8,000 | WECC201002076 | CIP-006-1 | R3 | Medium | | | X |
| 3/30/2012 | NP12-22-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | NPCC201000219 | CIP-006-2 | R5 | Medium | | | X |
| 3/30/2012 | NP12-22-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | NPCC201100247 | CIP-006-2 | R2 | Medium | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000240 | CIP-007-1 | R1.3 | Lower | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000241 | CIP-007-1 | R5.2 | Lower | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000242 | CIP-007-1 | R5.3 | Lower | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000349 | CIP-007-1 | R1.3 | Lower | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000352 | CIP-007-1 | R4; R4.1; R4.2 | Medium | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000353 | CIP-007-1 | R5; R5.1.3; R5.3 | Medium | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000354 | CIP-007-1 | R6; R6.1; R6.2; R6.5 | Medium | | | X |
| 3/30/2012 | NP12-22-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | NPCC201100248 | CIP-007-1 | R2 | Medium | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000243 | CIP-008-1 | R1 | Lower | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000244 | CIP-009-1 | R1 | Medium | | | X |
| 3/30/2012 | NP12-22-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$12,000 | SPP201000259 | CIP-009-1 | R2 | Lower | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$115,000 | RFC201100733 | CIP-002-3 | R3.2 | Lower | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$115,000 | RFC201000460 | CIP-004-2 | R4.2 | Medium | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$115,000 | RFC201100760 | CIP-005-3 | R1.4 | Medium | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$115,000 | RFC201100761 | CIP-005-3 | R2.2 | Medium | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$115,000 | RFC201100762 | CIP-005-3 | R3.2 | Medium | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$115,000 | RFC201100763 | CIP-005-3 | R4.2 | Medium | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$115,000 | RFC201100734 | CIP-006-3 | R1.1 | Medium | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$115,000 | RFC201000452 | CIP-007-1 | R3.1; R3.2 | Lower | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$115,000 | RFC201000453 | CIP-007-3 | R4.1 | Medium | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------------------|---|--|----------------------------|------------------------------------|
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$115,000 | RFC201000454 | CIP-007-3 | R6 | Lower | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$115,000 | RFC201100735 | CIP-007-3 | R1.1 | Medium | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$115,000 | RFC201100736 | CIP-007-3 | R2 | Medium | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$115,000 | RFC201100737 | CIP-007-3 | R6.1; R6.5 | Lower | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$115,000 | RFC201100764 | CIP-007-3 | R2.1 | Medium | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$115,000 | RFC201100765 | CIP-007-3 | R3.1; R3.2 | Lower | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$115,000 | RFC201100766 | CIP-007-3 | R5.1.2; R5.1.3; R5.3.2 | Lower/Medium | | | X |
| 4/30/2012 | NP12-25-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$115,000 | RFC201100767 | CIP-007-3 | R8.2 | Medium | | | X |
| 4/30/2012 | NP12-26-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | NPCC2011007269 | CIP-005-1 | R1; R1.5 | Medium | | | X |
| 4/30/2012 | NP12-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | RFC201100922 | CIP-005-1 | R3.2 | Medium | | | X |
| 4/30/2012 | NP12-26-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$8,000 | NPCC2011007731 | CIP-005-2 | R3; R3.2 | Medium | | | X |
| 4/30/2012 | NP12-26-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$17,300 | WECC201102977 | CIP-005-3 | R5 (R5.1) | Lower | | | X |
| 4/30/2012 | NP12-26-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$27,000 | SPP201000278 | CIP-006-1 | R1 | Medium | | | X |
| 4/30/2012 | NP12-26-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$27,000 | RFC201000366 | CIP-006-1 | R1 | Medium | | | X |
| 4/30/2012 | NP12-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$27,000 | TRE201000180 | CIP-006-1 | R1 | Medium | | | X |
| 4/30/2012 | NP12-26-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | NPCC2011007271 | CIP-006-1 | R1; R1.8 | Lower | | | X |
| 4/30/2012 | NP12-26-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$27,000 | SPP200900156 | CIP-007-1 | R1 | Medium | | | X |
| 4/30/2012 | NP12-26-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$27,000 | RFC200900327 | CIP-007-1 | R1 | Medium | | | X |
| 4/30/2012 | NP12-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$27,000 | TRE201000225 | CIP-007-1 | R1 | Medium | | | X |
| 4/30/2012 | NP12-26-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | NPCC2011007270 | CIP-007-1 | R3 | Lower | | | X |
| 4/30/2012 | NP12-26-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | NPCC2011007272 | CIP-007-1 | R1; R1.1 | Medium | | | X |
| 4/30/2012 | NP12-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | RFC201100923 | CIP-007-1 | R2 | Medium | | | X |
| 4/30/2012 | NP12-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | RFC201100924 | CIP-007-1 | R5; R5.2.2; R5.3 | Lower | | | X |
| 4/30/2012 | NP12-26-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$8,000 | NPCC2011007732 | CIP-007-1 | R5; R5.2.1; R5.3.2; R5.3.3 | Medium | | | X |
| 4/30/2012 | NP12-26-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$8,000 | NPCC2011008068 | CIP-007-1 | R5; R5.2.2 | Lower | | | X |
| 4/30/2012 | NP12-26-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$17,300 | WECC201102983 | CIP-007-3 | R9 | Lower | | | X |
| 4/30/2012 | NP12-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | RFC201100854 | CIP-009-1 | R1 | Medium | | | X |
| 4/30/2012 | NP12-26-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$6,000 | MRO201100249 | CIP-009-1 | R1 | Medium | | | X |
| 5/30/2012 | NP12-27-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$21,000 | WECC201102918 | CIP-002-1 | R3 | High | | | X |
| 5/30/2012 | NP12-27-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | MRO201100275 | CIP-003-1 | R6 | Lower | | | X |
| 5/30/2012 | NP12-27-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | MRO201100280 | CIP-003-1 | R3.3 | Lower | | | X |
| 5/30/2012 | NP12-27-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | MRO201100281 | CIP-003-1 | R5.2 | Lower | | | X |
| 5/30/2012 | NP12-27-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | MRO201100282 | CIP-004-1 | R4.1 | Lower | | | X |
| 5/30/2012 | NP12-27-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$21,000 | WECC201102919 | CIP-005-1 | R2; R2.2 | Medium | | | X |
| 5/30/2012 | NP12-27-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$15,600 | WECC2011008705 | CIP-005-1 | R1; R1.5 | Lower | | | X |
| 5/30/2012 | NP12-27-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | MRO201100283 | CIP-005-1 | R5.1 | Lower | | | X |
| 5/30/2012 | NP12-27-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$15,600 | WECC2011008703 | CIP-006-1 | R1; R1.8 | Lower | | | X |
| 5/30/2012 | NP12-27-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | MRO201100284 | CIP-006-1 | R1.1 | Medium | | | X |
| 5/30/2012 | NP12-27-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | MRO201000231 | CIP-006-2 | R2.2 | Medium | | | X |
| 5/30/2012 | NP12-27-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$21,000 | WECC201102920 | CIP-007-1 | R2; R2.2 | Medium | | | X |
| 5/30/2012 | NP12-27-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$15,600 | WECC2011008702 | CIP-007-1 | R5; R5.2.2 | Lower | | | X |
| 5/30/2012 | NP12-27-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | MRO201100276 | CIP-007-1 | R1.1 | Medium | | | X |
| 5/30/2012 | NP12-27-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | MRO201100278 | CIP-007-1 | R3.1 | Lower | | | X |
| 5/30/2012 | NP12-29-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$162,200 | WECC201102522 | CIP-005-1 | R2 | Medium | | | X |
| 5/30/2012 | NP12-29-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$162,200 | WECC201102887 | CIP-006-3e | R1 | Medium | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$67,500 | WECC201002448 | CIP-003-1 | R5; R5.2 | Lower | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$67,500 | WECC201002490 | CIP-003-1 | R6 | Lower | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$67,500 | WECC201002447 | CIP-004-1 | R4 | Lower | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$14,900 | WECC2011008643 | CIP-004-3 | R4.1; R4.2 | Lower | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$7,000 | WECC2012009825 | CIP-004-3 | R2.1 | Medium | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$67,500 | WECC201002491 | CIP-005-1 | R1 | Medium | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$12,500 | WECC2012009233 | CIP-005-1 | R1; R1.5 | Medium | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | WECC201102926 | CIP-005-1 | R2; R2.2 | Medium | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$67,500 | WECC201002492 | CIP-006-1 | R1; R1.8 | Medium | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$12,500 | WECC2012009235 | CIP-006-1 | R1; R1.8 | Lower | | | X |
| 6/29/2012 | NP12-36-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$8,000 | TRE201000348 | CIP-006-1 | R3 | Medium | | | X |
| 6/29/2012 | NP12-36-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$8,000 | TRE201000349 | CIP-006-1 | R4 | Lower | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$67,500 | WECC201002467 | CIP-007-1 | R1 | Medium | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$67,500 | WECC201002437 | CIP-007-1 | R2 | Medium | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$67,500 | WECC201102840 | CIP-007-1 | R3 | Lower | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$12,500 | WECC2011008663 | CIP-007-1 | R3; R3.1 | Lower | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | WECC201102927 | CIP-007-1 | R2; R2.1 | Medium | | | X |
| 6/29/2012 | NP12-36-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC200900347 | CIP-007-1 | R1 | Lower | | | X |
| 6/29/2012 | NP12-36-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$67,500 | WECC201102841 | CIP-009-1 | R1 | Medium | | | X |
| 7/31/2012 | NP12-37-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$134,350 | WECC201002254 | CIP-003-1 | R5.1 | Lower | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------|---|--|----------------------------|------------------------------------|
| 7/31/2012 | NP12-37-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$134,350 | WECC201002253 | CIP-003-1 | R4.2 | Lower | | | X |
| 7/31/2012 | NP12-37-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$134,350 | WECC201002258 | CIP-004-1 | R2 | Lower | | | X |
| 7/31/2012 | NP12-37-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$134,350 | WECC201002298 | CIP-004-1 | R3 | Medium | | | X |
| 7/31/2012 | NP12-37-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$134,350 | WECC201002259 | CIP-004-1 | R4 | Lower | | | X |
| 7/31/2012 | NP12-37-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$134,350 | WECC201002406 | CIP-006-1 | R2 | Medium | | | X |
| 7/31/2012 | NP12-37-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$134,350 | WECC201002299 | CIP-006-1 | R3 | Medium | | | X |
| 7/31/2012 | NP12-37-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$134,350 | WECC201002300 | CIP-006-1 | R4 | Lower | | | X |
| 7/31/2012 | NP12-37-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$134,350 | WECC201002379 | CIP-006-1 | R2 | Medium | | | X |
| 7/31/2012 | NP12-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$72,000 | WECC201002335 | CIP-002-1 | R1; R1.1 | Lower | | | X |
| 7/31/2012 | NP12-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$72,000 | WECC201002336 | CIP-004-1 | R2.1; R2.3 | Medium | | | X |
| 7/31/2012 | NP12-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$72,000 | WECC201002337 | CIP-004-1 | R3 | Medium | | | X |
| 7/31/2012 | NP12-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$72,000 | WECC201002175 | CIP-004-1 | R4 | Medium | | | X |
| 7/31/2012 | NP12-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$72,000 | WECC201102618 | CIP-004-3 | R4.1; R4.2 | Lower | | | X |
| 7/31/2012 | NP12-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$72,000 | WECC201002360 | CIP-005-2 | R1.5 | Medium | | | X |
| 7/31/2012 | NP12-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$72,000 | WECC201002185 | CIP-006-2 | R3 | Medium | | | X |
| 7/31/2012 | NP12-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$72,000 | WECC200902285 | CIP-007-1 | R5.1.2; R5.2.1 | Lower | | | X |
| 7/31/2012 | NP12-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$72,000 | WECC200902286 | CIP-007-1 | R6.5 | Lower | | | X |
| 7/31/2012 | NP12-40-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$22,000 | WECC201001885 | CIP-003-1 | R2; R2.1; R2.2 | Lower | | | X |
| 7/31/2012 | NP12-40-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$22,000 | WECC201001884 | CIP-003-1 | R1; R1.2; R1.3 | Lower | | | X |
| 7/31/2012 | NP12-40-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$12,600 | WECC201102894 | CIP-004-3 | R3; R3.2 | Lower | | | X |
| 7/31/2012 | NP12-40-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$12,600 | WECC201102895 | CIP-004-3 | R4 | Lower | | | X |
| 7/31/2012 | NP12-40-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | WECC201102667 | CIP-004-3 | R2; R2.1 | Medium | | | X |
| 7/31/2012 | NP12-40-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$15,000 | WECC2011008699 | CIP-005-1 | R2.2 | Medium | | | X |
| 7/31/2012 | NP12-40-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$15,000 | WECC2012009701 | CIP-005-1 | R1.5 | Medium | | | X |
| 7/31/2012 | NP12-40-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$39,000 | WECC201102804 | CIP-006-1 | R1.8 | Medium | | | X |
| 7/31/2012 | NP12-40-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$7,500 | WECC2012009702 | CIP-006-1 | R1; R1.8 | Medium | | | X |
| 7/31/2012 | NP12-40-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$15,000 | WECC2011009043 | CIP-006-1 | R1.1 | Medium | | | X |
| 7/31/2012 | NP12-40-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$22,000 | WECC201001886 | CIP-007-1 | R1; R1.3 | Lower | | | X |
| 7/31/2012 | NP12-40-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$15,000 | WECC2011008647 | CIP-007-1 | R2 | Medium | | | X |
| 7/31/2012 | NP12-40-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$39,000 | WECC201102943 | CIP-007-3 | R5.1.2 | Lower | | | X |
| 7/31/2012 | NP12-40-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$39,000 | WECC201102944 | CIP-007-3 | R6.4 | Lower | | | X |
| 8/31/2012 | NP12-43-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$70,000 | WECC201102832 | CIP-004-3 | R4 | Lower | | | X |
| 8/31/2012 | NP12-44-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | FRCC2011007972 | CIP-002-1 | R3 | High | | | X |
| 8/31/2012 | NP12-44-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | FRCC2011007970 | CIP-004-3 | R4.2 | Lower | | | X |
| 8/31/2012 | NP12-44-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$27,800 | WECC201102753 | CIP-004-3 | R4 | Medium | | | X |
| 8/31/2012 | NP12-44-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2011001265 | CIP-004-3 | R3.1 | Lower | | | X |
| 8/31/2012 | NP12-44-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2011001266 | CIP-004-3 | R3.1 | Lower | | | X |
| 8/31/2012 | NP12-44-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | FRCC2011007930 | CIP-005-1 | R1 | Medium | | | X |
| 8/31/2012 | NP12-44-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | FRCC2011007931 | CIP-005-1 | R4 | Medium | | | X |
| 8/31/2012 | NP12-44-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | FRCC2011008231 | CIP-005-1 | R2; R2.2; R2.4 | Medium | | | X |
| 8/31/2012 | NP12-44-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$30,000 | WECC2012009556 | CIP-005-1 | R2; R2.2 | Medium | | | X |
| 8/31/2012 | NP12-44-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$30,000 | WECC2012009557 | CIP-005-1 | R4 | Medium | | | X |
| 8/31/2012 | NP12-44-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | FRCC201000409 | CIP-007-1 | R6 | Medium | | | X |
| 8/31/2012 | NP12-44-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | FRCC2011007926 | CIP-007-1 | R2 | Medium | | | X |
| 8/31/2012 | NP12-44-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | FRCC2011007927 | CIP-007-1 | R8 | Medium | | | X |
| 8/31/2012 | NP12-44-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | FRCC2011007928 | CIP-007-1 | R5 | Medium | | | X |
| 8/31/2012 | NP12-44-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$75,000 | FRCC2011007969 | CIP-007-1 | R3 | Lower | | | X |
| 8/31/2012 | NP12-44-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC201103008 | CIP-007-1 | R2 | Medium | | | X |
| 8/31/2012 | NP12-44-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC201103009 | CIP-007-1 | R4 | Medium | | | X |
| 8/31/2012 | NP12-44-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC201103010 | CIP-007-1 | R5.3 | Medium | | | X |
| 8/31/2012 | NP12-44-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC201103011 | CIP-007-1 | R6 | Medium | | | X |
| 9/28/2012 | NP12-45-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | FRCC200900304 | CIP-004-1 | R4 | Lower | | | X |
| 9/28/2012 | NP12-45-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | FRCC201100420 | CIP-005-1 | R2.2 | Medium | | | X |
| 9/28/2012 | NP12-45-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | FRCC2011007252 | CIP-005-1 | R4.5 | Medium | | | X |
| 9/28/2012 | NP12-45-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | FRCC2011007256 | CIP-006-1 | R6 | Medium | | | X |
| 9/28/2012 | NP12-45-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | FRCC201000377 | CIP-006-2 | R5 | Medium | | | X |
| 9/28/2012 | NP12-45-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | FRCC2011007260 | CIP-007-1 | R6 | Medium | | | X |
| 9/28/2012 | NP12-45-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | FRCC201000312 | CIP-007-1 | R1 | Medium | | | X |
| 9/28/2012 | NP12-45-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | FRCC201000378 | CIP-007-1 | R3 | Lower | | | X |
| 9/28/2012 | NP12-45-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | FRCC201100421 | CIP-007-1 | R2 | Medium | | | X |
| 9/28/2012 | NP12-45-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | FRCC2011007241 | CIP-007-1 | R8 | Medium | | | X |
| 9/28/2012 | NP12-45-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | FRCC2011007259 | CIP-007-1 | R5 | Medium | | | X |
| 9/28/2012 | NP12-45-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | FRCC2011007257 | CIP-007-1 | R3 | Lower | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002338 | CIP-003-1 | R6 | Lower | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002339 | CIP-004-1 | R2 | Medium | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002362 | CIP-005-2 | R2 | Medium | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------|---|--|----------------------------|------------------------------------|
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002361 | CIP-005-2 | R1 | Medium | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002363 | CIP-005-2 | R3 | Medium | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002364 | CIP-005-2 | R4 | Medium | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002341 | CIP-007-1 | R1 | Medium | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002342 | CIP-007-1 | R3 | Lower | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002344 | CIP-007-1 | R5 | Medium | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002345 | CIP-007-1 | R6 | Medium | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002346 | CIP-007-1 | R7 | Lower | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002347 | CIP-007-1 | R8 | Medium | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002348 | CIP-007-1 | R9 | Lower | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002343 | CIP-007-1 | R4 | Medium | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002365 | CIP-008-2 | R1 | Lower | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002350 | CIP-009-1 | R3 | Lower | | | X |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002349 | CIP-009-1 | R1 | Medium | | | X |
| 9/28/2012 | NP12-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | WECC201002810 | CIP-002-1 | R1 | High | | | X |
| 9/28/2012 | NP12-47-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$5,500 | SPP201000299 | CIP-002-1 | R2 | High | | | X |
| 9/28/2012 | NP12-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | WECC201002812 | CIP-003-1 | R4; R4.1 | Lower | | | X |
| 9/28/2012 | NP12-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | WECC201002813 | CIP-004-1 | R4; R4.1 | Lower | | | X |
| 9/28/2012 | NP12-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | WECC201002400 | CIP-004-1 | R2; R2.1 | Medium | | | X |
| 9/28/2012 | NP12-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$0 | TRE201100398 | CIP-004-1 | R3; R3.1 | Lower | | | X |
| 9/28/2012 | NP12-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$0 | TRE201100380 | CIP-004.3 | R4; R4.2 | Lower | | | X |
| 9/28/2012 | NP12-47-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$12,000 | RFC2012009871 | CIP-005-1 | R4 | Medium | | | X |
| 9/28/2012 | NP12-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$0 | TRE201100343 | CIP-005-1 | R1; R1.6 | Lower | | | X |
| 9/28/2012 | NP12-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$0 | TRE201100517 | CIP-005-1 | R2 | Medium | | | X |
| 9/28/2012 | NP12-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$0 | TRE201100518 | CIP-005-1 | R4 | Medium | | | X |
| 9/28/2012 | NP12-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | WECC201002816 | CIP-006-1 | R3 | Medium | | | X |
| 9/28/2012 | NP12-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | WECC201002814 | CIP-006-1 | R1; R1.1; R1.8 | Medium | | | X |
| 9/28/2012 | NP12-47-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$12,000 | RFC2012010114 | CIP-006-1 | R1.8 | Lower | | | X |
| 9/28/2012 | NP12-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$0 | TRE201100359 | CIP-006-1 | R1; R1.8 | Medium | | | X |
| 9/28/2012 | NP12-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$0 | TRE201100335 | CIP-006-3a | R6 | Lower | | | X |
| 9/28/2012 | NP12-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$17,400 | WECC2012009304 | CIP-007-1 | R6 | Lower | | | X |
| 9/28/2012 | NP12-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$13,500 | TRE201000223 | CIP-007-1 | R4 | Medium | | | X |
| 9/28/2012 | NP12-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$13,500 | TRE2012010051 | CIP-007-1 | R4; R4.1; R4.2 | Medium | | | X |
| 9/28/2012 | NP12-47-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$12,000 | RFC2012001322 | CIP-007-1 | R4.2 | Medium | | | X |
| 9/28/2012 | NP12-47-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$12,000 | RFC2012009872 | CIP-007-1 | R8 | Lower | | | X |
| 9/28/2012 | NP12-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$7,000 | TRE201100475 | CIP-007-1 | R6 | Lower | | | X |
| 9/28/2012 | NP12-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$0 | TRE201000247 | CIP-007-1 | R1 | Medium | | | X |
| 9/28/2012 | NP12-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$0 | TRE201100345 | CIP-007-1 | R6 | Lower | | | X |
| 9/28/2012 | NP12-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$0 | TRE201100360 | CIP-007-1 | R8 | Lower | | | X |
| 9/28/2012 | NP12-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$0 | TRE201100519 | CIP-007-1 | R2 | Medium | | | X |
| 9/28/2012 | NP12-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$0 | TRE201100520 | CIP-007-1 | R3; R3.1 | Lower | | | X |
| 9/28/2012 | NP12-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | WECC201002817 | CIP-007-2a | R7; R7.1 | Lower | | | X |
| 10/31/2012 | NP13-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201102827 | CIP-002-1 | R3 | High | | | X |
| 10/31/2012 | NP13-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201102715 | CIP-003-1 | R6 | Lower | | | X |
| 10/31/2012 | NP13-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002389 | CIP-004-1 | R1 | Lower | | | X |
| 10/31/2012 | NP13-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201102828 | CIP-005-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201102830 | CIP-005-1 | R2 | Medium | | | X |
| 10/31/2012 | NP13-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002440 | CIP-005-1 | R4 | Medium | | | X |
| 10/31/2012 | NP13-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201102825 | CIP-006-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201102823 | CIP-007-1 | R2 | Medium | | | X |
| 10/31/2012 | NP13-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002713 | CIP-007-1 | R3 | Lower | | | X |
| 10/31/2012 | NP13-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC201002441 | CIP-007-1 | R8 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100957 | CIP-002-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100958 | CIP-002-1 | R2 | High | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100959 | CIP-002-1 | R3 | High | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100960 | CIP-002-1 | R4 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100961 | CIP-003-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100962 | CIP-003-1 | R5 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100963 | CIP-003-1 | R6 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001274 | CIP-003-1 | R6 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001275 | CIP-003-1 | R6 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100964 | CIP-004-1 | R1 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001276 | CIP-004-1 | R1 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001277 | CIP-004-1 | R1 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100966 | CIP-004-1 | R3 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001278 | CIP-004-1 | R3 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001279 | CIP-004-1 | R3 | Lower | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|------|---|--|----------------------------|------------------------------------|
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001280 | CIP-004-1 | R4 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001281 | CIP-004-1 | R4 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001282 | CIP-004-1 | R4 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100965 | CIP-004-2 | R2 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2012010075 | CIP-004-2 | R2 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2012010076 | CIP-004-2 | R2 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100967 | CIP-005-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001178 | CIP-005-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001179 | CIP-005-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100968 | CIP-005-1 | R2 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001283 | CIP-005-1 | R2 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001284 | CIP-005-1 | R2 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100969 | CIP-005-1 | R3 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100970 | CIP-005-1 | R4 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100971 | CIP-005-1 | R5 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001285 | CIP-005-1 | R5 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001286 | CIP-005-1 | R5 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100972 | CIP-006-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001287 | CIP-006-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001288 | CIP-006-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100973 | CIP-007-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001289 | CIP-007-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001290 | CIP-007-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201000561 | CIP-007-1 | R2 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201000582 | CIP-007-1 | R2 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201000540 | CIP-007-1 | R2 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2012009913 | CIP-007-1 | R2 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2012009914 | CIP-007-1 | R2 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2012009915 | CIP-007-1 | R2 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100974 | CIP-007-1 | R3 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001291 | CIP-007-1 | R3 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001292 | CIP-007-1 | R3 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100975 | CIP-007-1 | R3 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100976 | CIP-007-1 | R4 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001293 | CIP-007-1 | R4 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001294 | CIP-007-1 | R4 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100977 | CIP-007-1 | R5 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001180 | CIP-007-1 | R5 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001181 | CIP-007-1 | R5 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100978 | CIP-007-1 | R5 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100979 | CIP-007-1 | R6 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001295 | CIP-007-1 | R6 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001296 | CIP-007-1 | R6 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100981 | CIP-007-1 | R8 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100982 | CIP-008-1 | R1 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001182 | CIP-008-1 | R1 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001183 | CIP-008-1 | R1 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100983 | CIP-009-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001184 | CIP-009-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001185 | CIP-009-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100984 | CIP-009-1 | R2 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100985 | CIP-009-1 | R3 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100986 | CIP-009-1 | R4 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001299 | CIP-009-1 | R4 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001300 | CIP-009-1 | R4 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC201100987 | CIP-009-1 | R5 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001186 | CIP-009-1 | R5 | Lower | | | X |
| 10/31/2012 | NP13-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$725,000 | RFC2011001187 | CIP-009-1 | R5 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$40,000 | NPCC2011007407 | CIP-002-2 | R1.2 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$25,000 | SPP201000376 | CIP-003-1 | R5 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$40,000 | NPCC2011007408 | CIP-003-2 | R5 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$54,000 | WECC2011009023 | CIP-004-1 | R4 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC201102850 | CIP-004-1 | R2 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC201002790 | CIP-004-1 | R3 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC201002791 | CIP-004-1 | R4 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$30,000 | RFC201000624 | CIP-004-1 | R3.2 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$40,000 | NPCC2011007409 | CIP-004-2 | R4 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$30,000 | RFC201100747 | CIP-004-3 | R2.1 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC201102793 | CIP-005-1 | R1 | Medium | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|------------------------------|---|--|----------------------------|------------------------------------|
| 10/31/2012 | NP13-5-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | WECC201002794 | CIP-005-1 | R2; R2.4; R2.5.3 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | RFC201100822 | CIP-005-1 | R1 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | SPP201000378 | CIP-005-1 | R3; R3.2 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | SPP201000379 | CIP-005-1 | R4 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$24,000 | WECC2012009976 | CIP-005-1 | R3; R3.2 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | WECC201102428 | CIP-005-2 | R5; R5.2 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | NPCC2011007410 | CIP-005-2 | R1.5 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | WECC201002792 | CIP-006-1 | R1; R1.5; R1.8 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | RFC201000367 | CIP-006-1 | R1.1 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | SPP201100520 | CIP-006-1 | R3; R3.1 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$24,000 | WECC2012009938 | CIP-006-1 | R3 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$24,000 | WECC2012009939 | CIP-006-1 | R4 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | NPCC2011007417 | CIP-006-2 | R1 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | NPCC2011007427 | CIP-006-2 | R3 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | NPCC2011007428 | CIP-006-2 | R8 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$54,000 | WECC2011009024 | CIP-007-1 | R3 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | WECC201102795 | CIP-007-1 | R5 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | RFC201100865 | CIP-007-1 | R6 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | RFC201100942 | CIP-007-1 | R5.3 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | SPP201000383 | CIP-007-1 | R2; R2.1; R2.2 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | SPP201000384 | CIP-007-1 | R3 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | SPP201000385 | CIP-007-1 | R6; R6.1; R6.2 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | SPP201000386 | CIP-007-1 | R7 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | SPP201000387 | CIP-007-1 | R8 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | SPP201000388 | CIP-007-1 | R9 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$17,000 | TRE201100264 | CIP-007-1 | R2; R2.1 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | WECC201102788 | CIP-007-2a | R3; R3.1 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | WECC201102439 | CIP-007-2a | R7; R7.2 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | NPCC2011007411 | CIP-007-2a | R1 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | NPCC2011007412 | CIP-007-2a | R3 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | NPCC2011007413 | CIP-007-2a | R4.2 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | NPCC2011007414 | CIP-007-2a | R5 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | RFC201100780 | CIP-007-2a | R3.1 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | RFC201100864 | CIP-007-2a | R2 | Medium | | | X |
| 10/31/2012 | NP13-5-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$17,000 | TRE201100265 | CIP-007-2a | R3; R3.1 and R3.2 | Lower | | | X |
| 10/31/2012 | NP13-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | SPP201000389 | CIP-009-1 | R4 | Lower | | | X |
| 11/30/2012 | NP13-6-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$62,500 | WECC201102890 | CIP-007-1 | R6 | Medium | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP201100596 | CIP-002-1 | R2 | Lower | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP201000421 | CIP-003-1 | R5.2 | Lower | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP201100535 | CIP003-3 | R6 | Lower | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP2012009984 | CIP-004-3 | R3 | Medium | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP2012009762 | CIP-004-3 | R4.1; R4.2 | Lower | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP2012009554 | CIP-004-3 | R2.1 | Medium | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP201100557 | CIP-004-3 | R4.2 | Lower | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP201100598 | CIP-005-1 | R4.2 | Medium | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP201100558 | CIP-005-1 | R1 | Medium | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP201100600 | CIP-006-1 | R1.1; R1.8 | Medium; Lower | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP201100603 | CIP-007-1 | R6.5 | Lower | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP201100602 | CIP-007-1 | R5.1.1; R5.2; R5.2.3; R5.3.3 | Lower; Lower; Medium; Medium | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP201100601 | CIP-007-1 | R3.2 | Lower | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP201100536 | CIP-007-3 | R1.1 | Medium | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP2012010535 | CIP-007-3 | R5.1.1 | Lower | | | X |
| 12/31/2012 | NP13-11-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$107,000 | SPP201100526 | CIP-007-3 | R9 | Lower | | | X |
| 12/31/2012 | NP13-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$65,000 | RFC201000657 | CIP-002-1 | R3.1 | Lower | | | X |
| 12/31/2012 | NP13-12-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$15,000 | SPP201000317 | CIP-002-1 | R3 | High | | | X |
| 12/31/2012 | NP13-12-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$15,000 | WECC2012010516 | CIP-002-1 | R3 | High | | | X |
| 12/31/2012 | NP13-12-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$15,000 | SPP201000318 | CIP-003-1 | R1.1; R1.3 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$5,000 | WECC2012010392 | CIP-003-3 | R6 | Lower | | | X |
| 12/31/2012 | NP13-12-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$51,000 | TRE201000141 | CIP-004-1 | R3 | Lower | | | X |
| 12/31/2012 | NP13-12-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$15,000 | SPP201000319 | CIP-004-1 | R2.1; R2.2.1; R2.3 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$51,000 | TRE201000140 | CIP-004-2 | R2 | Lower | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|----------------------------------|--|---|-------------------|----------------------|----------------------|---|--|----------------------------|------------------------------------|
| 12/31/2012 | NP13-12-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$20,000 | MRO2012010185 | CIP-004-2 | R3; R3.1 | Lower | | | X |
| 12/31/2012 | NP13-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$65,000 | RFC201000444 | CIP-005-1 | R1.6 | Lower | | | X |
| 12/31/2012 | NP13-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$65,000 | RFC201000445 | CIP-005-1 | R2.2 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$65,000 | RFC201000446 | CIP-005-1 | R4.2 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | FRCC2011007516 | CIP-005-1 | R2; R2.2; R2.4; R2.6 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | FRCC2011007518 | CIP-005-1 | R4; R4.2; R4.3; R4.4 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | FRCC2011007515 | CIP-005-1 | R1 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | FRCC2011007517 | CIP-005-1 | R3; R3.2 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | RFC201100885 | CIP-005-1 | R1; R1.5 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | FRCC201100435 | CIP-006-1 | R1.8 | Lower | | | X |
| 12/31/2012 | NP13-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | RFC2011001206 | CIP-006-1 | R1.8 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$51,000 | TRE201000144 | CIP-006-2 | R1.1 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$51,000 | TRE201000143 | CIP-006-2 | R2 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$65,000 | RFC201000447 | CIP-007-1 | R2.1 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$65,000 | RFC201000448 | CIP-007-1 | R8.2 | Lower | | | X |
| 12/31/2012 | NP13-12-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | FRCC201100436 | CIP-007-1 | R2; R2.1; R2.2 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | FRCC2011007519 | CIP-007-1 | R5; R5.1.3; R5.2.2 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | FRCC2011007523 | CIP-007-1 | R3; R3.1 | Lower | | | X |
| 12/31/2012 | NP13-12-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$15,000 | SPP201000322 | CIP-007-1 | R1 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | RFC2011001207 | CIP-007-1 | R3 | Lower | | | X |
| 12/31/2012 | NP13-12-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$20,000 | MRO201100395 | CIP-007-3 | R3; R3.1 | Lower | | | X |
| 12/31/2012 | NP13-12-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$20,000 | MRO2012009816 | CIP-007-3 | R6; R6.4 | Lower | | | X |
| 12/31/2012 | NP13-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | RFC201100887 | CIP-007-3 | R1 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | RFC201100888 | CIP-007-3 | R2; R2.1 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$10,000 | RFC2011001208 | CIP-007-3 | R4; R4.2 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$15,000 | SPP201000323 | CIP-008-1 | R1 | Lower | | | X |
| 12/31/2012 | NP13-12-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$51,000 | TRE201000146 | CIP-009-1 | R1.1 | Medium | | | X |
| 12/31/2012 | NP13-12-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$15,000 | SPP201000324 | CIP-009-1 | R2 | Lower | | | X |
| 12/31/2012 | NP13-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$207,000 | WECC201002302 | CIP-002-1 | R3 | High | | | X |
| 12/31/2012 | NP13-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$207,000 | WECC201002301 | CIP-002-1 | R1 | Medium | | | X |
| 12/31/2012 | NP13-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$207,000 | WECC201002303 | CIP-003-1 | R1; R1.2 | Lower | | | X |
| 12/31/2012 | NP13-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$207,000 | WECC201002305 | CIP-004-1 | R2; R2.1; R2.2; R2.3 | Medium | | | X |
| 12/31/2012 | NP13-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$207,000 | WECC201002306 | CIP-004-1 | R4 | Medium | | | X |
| 12/31/2012 | NP13-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$207,000 | WECC201002307 | CIP-005-1 | R1 | Medium | | | X |
| 12/31/2012 | NP13-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$207,000 | WECC201002308 | CIP-006-2 | R1 | Medium | | | X |
| 12/31/2012 | NP13-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$207,000 | WECC201002311 | CIP-007-1 | R3 | Lower | | | X |
| 12/31/2012 | NP13-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$207,000 | WECC201002310 | CIP-007-1 | R1 | Medium | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100807 | CIP-005-2 | R4; R4.2 | Medium | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100797 | CIP-005-2 | R4; R4.2 | Medium | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100787 | CIP-005-2 | R4; R4.2 | Medium | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100785 | CIP-005-3 | R1; R1.5 | Medium | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100795 | CIP-005-3 | R1; R1.5 | Medium | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100805 | CIP-005-3 | R1; R1.5 | Medium | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100786 | CIP-005-3 | R2 | Medium | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100796 | CIP-005-3 | R2 | Medium | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100806 | CIP-005-3 | R2 | Medium | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|----------------------------------|--|---|-------------------|----------------------|----------------------|---|--|----------------------------|------------------------------------|
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100808 | CIP-006-3 | R2; R2.2 | Medium | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100798 | CIP-006-3 | R2; R2.2 | Medium | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100788 | CIP-006-3 | R2; R2.2 | Medium | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100801 | CIP-007-3 | R3 | Lower | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100809 | CIP-007-3 | R2 | Medium | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100813 | CIP-007-3 | R8 | Lower | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100804 | CIP-007-3 | R8 | Lower | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100810 | CIP-007-3 | R3 | Lower | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100791 | CIP-007-3 | R3 | Lower | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100794 | CIP-007-3 | R8 | Lower | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100790 | CIP-007-3 | R2 | Medium | | | X |
| 12/31/2012 | NP13-17-000 | RF | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$80,000 | RFC201100800 | CIP-007-3 | R2 | Medium | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP201100604 | CIP-002-1 | R2 | Lower | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP201000425 | CIP-003-1 | R5.2 | Lower | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP201000426 | CIP-003-1 | R6 | Lower | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP2012009760 | CIP-004-3 | R4.1; R4.2 | Lower | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP2012009983 | CIP-004-3 | R3 | Medium | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP2012009547 | CIP-004-3 | R2.1 | Medium | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP201100568 | CIP-004-3 | R4.1, R4.2 | Lower | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP201100610 | CIP-005-1 | R2.2; R2.6 | Medium, Lower | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP201100569 | CIP-005-1 | R1 | Medium | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP201100605 | CIP-005-1 | R4.2 | Medium | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP201100607 | CIP-006-1 | R1.1; R1.8 | Medium, Lower | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP201100609 | CIP-007-1 | R5.2; R5.2.3; R5.3.2 | Lower, Medium, Medium | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP201100608 | CIP-007-1 | R3.2 | Lower | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP201100528 | CIP-007-1 | R9 | Lower | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP201000428 | CIP-007-1 | R4.2 | Lower | | | X |
| 12/31/2012 | NP13-18-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$153,000 | SPP2012009592 | CIP-007-3 | R4.1; R4.2 | Medium | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC200900297 | CIP-002-1 | R3 | Lower | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC200900320 | CIP-002-1 | R2 | High | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC201000515 | CIP-003-1 | R1.2 | Lower | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC200900283 | CIP-004-1 | R4 | Lower | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC200900321 | CIP-004-1 | R2 | Medium | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC201000483 | CIP-005-1 | R4 | Medium | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC200900421 | CIP-005-1 | R3 | Medium | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC201000480 | CIP-005-1 | R2 | Medium | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC200900290 | CIP-005-1 | R1 | Medium | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC200900357 | CIP-006-1 | R1 | Medium | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC200900393 | CIP-006-1 | R3 | Lower | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC201000627 | CIP-006-1 | R4 | Medium | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC201000484 | CIP-006-1 | R6 | Medium | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC201000486 | CIP-006-1 | R5 | Lower | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC200900315 | CIP-007-1 | R5 | Lower | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC201000479 | CIP-007-1 | R8 | Lower | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$950,000 | SERC200900313 | CIP-007-1 | R3 | Lower | | | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|-----------------------|----------------------------|---|--|----------------------------|------------------------------------|
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$950,000 | SERC201000485 | CIP-007-1 | R7 | Lower | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$950,000 | SERC201000577 | CIP-007-1 | R6 | Lower | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$950,000 | SERC201000688 | CIP-007-1 | R4 | Medium | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$950,000 | SERC200900312 | CIP-007-1 | R2 | Medium | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$950,000 | SERC200900310 | CIP-007-1 | R1 | Medium | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$950,000 | SERC200900314 | CIP-007-2a | R6 | Lower | | | X |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$950,000 | SERC200900316 | CIP-009-1 | R1 | Medium | | | X |
| 1/31/2013 | NP13-22-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$115,000 | WECC201102693 | CIP-005-1 | 1 | Medium | | | X |
| 1/31/2013 | NP13-22-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$115,000 | WECC201102689 | CIP-006-1 | 1,8 | Lower | | | X |
| 1/31/2013 | NP13-22-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$115,000 | WECC201102687 | CIP-007-1 | 1 | Medium | | | X |
| 1/31/2013 | NP13-22-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$115,000 | WECC201102691 | CIP-007-1 | 3,1 | Lower | | | X |
| 1/31/2013 | NP13-23-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$15,000 | WECC201102933 | CIP-002-3 | R1; R1.1 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | RFC2011001001 | CIP-003-3 | R6 | Lower | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | RFC2011001070 | CIP-003-3 | R6 | Lower | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | RFC2011001138 | CIP-004-2; CIP-004-3 | R2.1 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | RFC2011001139 | CIP-004-2; CIP-004-3 | R3 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012009852 | CIP-004-3 | R4 | Lower | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012009907 | CIP-004-3 | R4 | Lower | | | X |
| 1/31/2013 | NP13-23-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$8,000 | FRCC2011007803 | CIP-005-1 | R2; R2.1; R2.2 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | RFC2011001140 | CIP-005-2; CIP-005-3 | R4.3; R4.4 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010419 | CIP-005-2a | R3 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | WECC2012010776 | CIP-005-3a | R1; R1.5 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010101 | CIP-005-3a | R5 | Lower | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012001321 | CIP-006-3c | R2 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC201100867 | CIP-006-3c | R2.2 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC201100868 | CIP-006-3c | R2.2 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC201100869 | CIP-006-3c | R2.2 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC201100870 | CIP-006-3c | R2.2 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC201100871 | CIP-006-3c | R2.2 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012009861 | CIP-006-3c | R2.2 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012009859 | CIP-006-3c | R1 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012009860 | CIP-006-3c | R1 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC201100866 | CIP-006-3c | R2.2 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$8,000 | FRCC2011007586 | CIP-007-1 | R4; R4.1 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2011001125 | CIP-007-2a | R6; R6.2; R6.3; R6.4; R6.5 | Lower | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | RFC2011001144 | CIP-007-2a; CIP-007-3 | R5.1; R5.1.3; R5.2; R5.3.2 | Lower/Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | RFC2011001146 | CIP-007-2a; CIP-007-3 | R8.2; R8.3 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012001323 | CIP-007-3 | R6 | Medium | | | X |
| 1/31/2013 | NP13-23-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | RFC2011001147 | CIP-008-2; CIP-008-3 | R1.1; R1.2 | Lower | | | X |
| 2/28/2013 | NP13-24-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$151,500 | WECC201102660 | CIP-004-3 | R3.2 | Lower | Minimal | 12/29/2010 | X |
| 2/28/2013 | NP13-24-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$151,500 | WECC201102712 | CIP-006-1 | R3.1 | Medium | Moderate | 7/24/2012 | X |
| 2/28/2013 | NP13-24-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$151,500 | WECC201002653 | CIP-000-1 | R1.6 | Medium | Minimal | 11/15/2010 | X |
| 2/28/2013 | NP13-24-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$151,500 | WECC201102651 | CIP-006-1 | R3 | Medium | Moderate | 2/2/2011 | X |
| 2/28/2013 | NP13-24-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$151,500 | WECC201102798 | CIP-006-1 | R4 | Lower | Minimal | 3/1/2011 | X |
| 2/28/2013 | NP13-24-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$151,500 | WECC201102671 | CIP-007-1 | R1 | Medium | Moderate | 9/14/2010 | X |
| 2/28/2013 | NP13-24-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$151,500 | WECC201002672 | CIP-007-1 | R3 | Lower | Moderate | 8/13/2010 | X |
| 2/28/2013 | NP13-24-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$151,500 | WECC201002673 | CIP-007-1 | R5.3.2 | Lower | Minimal | 8/13/2010 | X |
| 2/28/2013 | NP13-24-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$151,500 | WECC201102799 | CIP-007-2 | R6 | Medium | Moderate | 9/14/2010 | X |
| 2/28/2013 | NP13-27-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$8,000 | SPP201100661 | CIP-003-1 | R6 | Lower | Minimal | 3/29/2012 | X |
| 2/28/2013 | NP13-27-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | MRO201100297 | CIP-005-1 | R1; R1.5 | Medium | Minimal | 1/31/2012 | X |
| 2/28/2013 | NP13-27-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | MRO201100298 | CIP-005-1 | R2; R2.2; R2.6 | Medium | Minimal | 1/1/2012 | X |
| 2/28/2013 | NP13-27-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$35,000 | WECC2012009096 | CIP-006-1 | R1; R1.8 | Medium | Minimal | 11/29/2012 | X |
| 2/28/2013 | NP13-27-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | MRO201100301 | CIP-006-1 | R1; R1.8 | Medium | Moderate | 6/29/2012 | X |
| 2/28/2013 | NP13-27-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$8,000 | SPP2012009591 | CIP-006-1 | R1; R1.8 | Medium | Minimal | 6/19/2012 | X |
| 2/28/2013 | NP13-27-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$0 | SPP201100668 | CIP-006-3c | R5 | Medium | Moderate | 6/9/2011 | X |
| 2/28/2013 | NP13-27-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$35,000 | WECC2012009095 | CIP-007-1 | R3 | Lower | Minimal | 9/28/2012 | X |
| 2/28/2013 | NP13-27-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | MRO201100303 | CIP-007-1 | R2; R2.1; R2.2 | Medium | Minimal | 1/1/2012 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|----------------------|--------------------------------|--|---|-------------------|----------------------|-----|---|--|----------------------------|------------------------------------|
| 2/28/2013 | NP13-27-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$10,000 | MRO201100304 | CIP-007-1 | R3 | Lower | Minimal | 1/31/2012 | X |
| 2/28/2013 | NP13-27-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$8,000 | SPP201100663 | CIP-007-1 | R3 | Lower | Minimal | 2/15/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | TRE201100369 | CIP-004-3 | R4 | Lower | Minimal | 10/21/2011 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | SPP201100594 | CIP-004-3 | R4 | Lower | Minimal | 10/21/2011 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | RFC201100948 | CIP-004-3 | R4 | Lower | Minimal | 10/21/2011 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | RFC201100931 | CIP-004-3 | R3 | Lower | Moderate | 9/30/2011 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | TRE201100368 | CIP-004-3 | R3 | Lower | Moderate | 9/30/2011 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | SPP201100586 | CIP-004-3 | R3 | Lower | Moderate | 9/30/2011 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | RFC2011001079 | CIP-005-3a | R4 | Medium | Moderate | 11/30/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | SPP201100613 | CIP-005-3a | R4 | Medium | Moderate | 11/30/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | TRE201100371 | CIP-005-3a | R2 | Medium | Minimal | 11/30/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | SPP201100612 | CIP-005-3a | R2 | Medium | Minimal | 11/30/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | TRE201100372 | CIP-005-3a | R4 | Medium | Moderate | 11/30/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | RFC2011001078 | CIP-005-3a | R2 | Medium | Minimal | 11/30/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | TRE201100374 | CIP-006-3c | R2 | Medium | Moderate | 9/23/2011 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | TRE201100375 | CIP-006-3c | R6 | Lower | Moderate | 1/1/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | SPP201100595 | CIP-006-3c | R6 | Lower | Moderate | 1/1/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | RFC201100935 | CIP-006-3c | R6 | Lower | Moderate | 1/1/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | SPP201100588 | CIP-006-3c | R2 | Medium | Moderate | 9/23/2011 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | RFC201100934 | CIP-006-3c | R2 | Medium | Moderate | 9/23/2011 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | TRE201100373 | CIP-006-3c | R1 | Medium | Moderate | 2/15/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | SPP201100589 | CIP-006-3c | R1 | Medium | Moderate | 2/15/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | RFC201100933 | CIP-006-3c | R1 | Medium | Moderate | 2/15/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | SPP201100518 | CIP-007-3 | R6 | Lower | Moderate | 6/19/2012 | X |

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| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | RFC2011001082 | CIP-007-3 | R3 | Lower | Moderate | 11/30/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | TRE201000205 | CIP-007-3 | R5 | Medium | Moderate | 11/30/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | SPP201000447 | CIP-007-3 | R5 | Medium | Moderate | 11/30/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | RFC201000690 | CIP-007-3 | R5 | Medium | Moderate | 11/30/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | TRE201100377 | CIP-007-3 | R3 | Lower | Moderate | 11/30/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | SPP201100616 | CIP-007-3 | R3 | Lower | Moderate | 11/30/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | RFC201100769 | CIP-007-3 | R6 | Lower | Moderate | 6/19/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | TRE201100376 | CIP-007-3 | R2 | Medium | Moderate | 11/30/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | SPP201100615 | CIP-007-3 | R2 | Medium | Moderate | 11/30/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | RFC2011001081 | CIP-007-3 | R2 | Medium | Moderate | 11/30/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | TRE201100291 | CIP-007-3 | R6 | Lower | Moderate | 6/19/2012 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | RFC201100936 | CIP-007-3 | R8 | Lower | Moderate | 12/12/2011 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | TRE201100379 | CIP-007-3 | R8 | Lower | Moderate | 12/12/2011 | X |
| 3/27/2013 | NP13-28-000 | RF, Texas RE, SPP RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$90,000 | SPP201100591 | CIP-007-3 | R8 | Lower | Moderate | 12/12/2011 | X |
| 3/27/2013 | NP13-29-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$48,000 | SERC2012009885 | CIP-002-1 | R3; R3.2 | High | Minimal | 5/30/2012 | X |
| 3/27/2013 | NP13-29-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$32,000 | FRCC2011007853 | CIP-002-1 | R3; R3.3 | High | Moderate | 7/7/2011 | X |
| 3/27/2013 | NP13-29-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012010779 | CIP-002-3 | R3 | High | Moderate | 2/28/2013 | X |
| 3/27/2013 | NP13-29-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$48,000 | SERC2012009886 | CIP-003-1 | R6 | Lower | Moderate | 5/29/2012 | X |
| 3/27/2013 | NP13-29-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$32,000 | FRCC2011008470 | CIP-005-1 | R1; R1.5 | Medium | Moderate | 3/31/2013 (approved completion date) | X |
| 3/27/2013 | NP13-29-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$32,000 | FRCC2011008521 | CIP-005-1 | R2; R2.2 | Medium | Minimal | 12/29/2013 (approved completion date) | X |
| 3/27/2013 | NP13-29-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$32,000 | FRCC2011008523 | CIP-005-1 | R4.2 | Medium | Moderate | 8/7/2012 | X |
| 3/27/2013 | NP13-29-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$48,000 | SERC2012009887 | CIP-005-1 | R1; R1.4; R1.5 | Medium | Moderate | 11/26/2012 | X |
| 3/27/2013 | NP13-29-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$48,000 | SERC2012009888 | CIP-005-1 | R2; R2.1; R2.2 | Medium | Moderate | 11/27/2012 | X |
| 3/27/2013 | NP13-29-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012009917 | CIP-005-3 | R3 | Medium | Moderate | 11/16/2012 | X |
| 3/27/2013 | NP13-29-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$48,000 | SERC2012009891 | CIP-006-1 | R1; R1.1.; R1.2; R1.8 | Medium | Moderate | 11/26/2012 | X |
| 3/27/2013 | NP13-29-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$48,000 | SERC2012009892 | CIP-006-1 | R3; R3.1 | Medium | Minimal | 3/1/2012 | X |
| 3/27/2013 | NP13-29-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$48,000 | SERC2012009890 | CIP-006-2a | R1; R1.1. | Medium | Minimal | 5/30/2012 | X |
| 3/27/2013 | NP13-29-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$48,000 | SERC2012009893 | CIP-007-1 | R1 | Medium | Moderate | 10/15/2012 | X |
| 3/27/2013 | NP13-29-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$48,000 | SERC2012009894 | CIP-007-1 | R5; R5.2; R5.3 | Lower | Moderate | 10/15/2012 | X |
| 3/27/2013 | NP13-29-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$48,000 | SERC2012009895 | CIP-007-1 | R7 | Lower | Minimal | 10/15/2012 | X |
| 3/27/2013 | NP13-29-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$32,000 | FRCC2011008524 | CIP-007-1 | R8; R8.2; R8.4 | Medium | Minimal | 11/1/2013 (approved completion date) | X |
| 3/27/2013 | NP13-29-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$48,000 | SERC2012009896 | CIP-007-1 | R8; R8.2 | Lower | Moderate | 12/12/2012 | X |
| 3/27/2013 | NP13-29-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012009916 | CIP-007-3 | R6 | Medium | Moderate | 11/16/2012 | X |

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| 3/27/2013 | NP13-29-000 | RF, SPP RE, Texas RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$0 | RFC201100932 SPP201100587 TRE201100370 | CIP-005-3a | R1 | Medium | Minimal | 2/29/2012 | X |
| 3/27/2013 | NP13-29-000 | RF, SPP RE, Texas RE | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$0 | RFC2011001088 SPP201100669 TRE201100463 | CIP-007-3 | R1.7 | Medium | Minimal | 11/15/2011 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001148 | CIP-004-1 | R2 | Medium | Moderate | 3/26/2012 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001157 | CIP-004-1 | R2 | Medium | Moderate | 3/26/2012 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001158 | CIP-005-1 | R1 | Medium | Moderate | 8/2/2012 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001149 | CIP-005-1 | R1 | Medium | Moderate | 8/2/2012 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001166 | CIP-005-1 | R1 | Medium | Moderate | 8/2/2012 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001150 | CIP-005-1 | R2 | Medium | Moderate | 6/13/2012 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001159 | CIP-005-1 | R2 | Medium | Moderate | 6/13/2012 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001167 | CIP-005-1 | R2 | Medium | Moderate | 6/13/2012 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001160 | CIP-005-1 | R4 | Medium | Moderate | 6/13/2012 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001152 | CIP-005-1 | R5 | Lower | Minimal | 8/23/2011 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001161 | CIP-005-1 | R5 | Lower | Minimal | 8/23/2011 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001169 | CIP-005-1 | R5 | Lower | Minimal | 8/23/2011 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001153 | CIP-006-1 | R1 | Medium | Moderate | 4/30/2013 (approved completion date) | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001170 | CIP-006-1 | R1 | Medium | Moderate | 4/30/2013 (approved completion date) | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001162 | CIP-006-1 | R1 | Medium | Moderate | 4/30/2013 (approved completion date) | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001173 | CIP-007-1 | R9 | Lower | Moderate | 8/2/2012 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001172 | CIP-007-1 | R5 | Medium | Minimal | 4/1/2013 (approved completion date) | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001165 | CIP-007-1 | R9 | Lower | Moderate | 8/2/2012 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001156 | CIP-007-1 | R9 | Lower | Moderate | 8/2/2012 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001164 | CIP-007-1 | R5 | Medium | Minimal | 4/1/2013 (approved completion date) | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001155 | CIP-007-1 | R5 | Medium | Minimal | 4/1/2013 (approved completion date) | X |

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| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001171 | CIP-007-1 | R3 | Lower | Moderate | 7/23/2012 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001163 | CIP-007-1 | R3 | Lower | Moderate | 7/23/2012 | X |
| 3/27/2013 | NP13-30-000 | RF | Unidentified Registered Entity | NCRXXXXX, NCRXXXXX, NCRXXXXX | \$120,000 | RFC2011001154 | CIP-007-1 | R3 | Lower | Moderate | 7/23/2012 | X |
| 4/30/2013 | NP13-32-000 | NCEA | Unidentified Registered Entity | NCRXXXXX | \$40,000 | NCEA201200129 | CIP-007-1 | R1.1 | Medium | Moderate | 4/29/2010 | X |
| 4/30/2013 | NP13-32-000 | NCEA | Unidentified Registered Entity | NCRXXXXX | \$40,000 | NCEA201200130 | CIP-007-1 | R1.2 | Lower | Moderate | 4/29/2010 | X |
| 4/30/2013 | NP13-32-000 | NCEA | Unidentified Registered Entity | NCRXXXXX | \$40,000 | NCEA201200131 | CIP-007-1 | R1.3 | Lower | Minimal | 8/7/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$4,250 | WECC2011008637 | CIP-002-1 | R3; R3.2; R3.3 | Lower | Minimal | 7/3/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$58,000 | WECC201103033 | CIP-003-1 | R1 | Lower | Minimal | 10/11/2011 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$58,000 | WECC201103034 | CIP-003-1 | R4 | Medium | Moderate | 12/29/2011 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$53,000 | WECC201103027 | CIP-003-1 | R1; R1.1 | Lower | Minimal | 10/11/2011 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$53,000 | WECC201103028 | CIP-003-1 | R4 | Medium | Minimal | 12/29/2011 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$58,000 | WECC201103035 | CIP-004-1 | R1 | Lower | Minimal | 9/22/2010 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$53,000 | WECC201103029 | CIP-004-1 | R1 | Lower | Minimal | 9/22/2010 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$58,000 | WECC2011008638 | CIP-004-2 | R3 | Medium | Minimal | 10/31/2011 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | NPCC2012009745 | CIP-004-3 | R4; R4.1 | Lower | Minimal | 4/2/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$58,000 | WECC2011008994 | CIP-005-1 | R1 | Medium | Moderate | 7/3/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$58,000 | WECC2012010446 | CIP-005-1 | R2 | Medium | Minimal | 11/8/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$58,000 | WECC2012010448 | CIP-005-1 | R4 | Medium | Moderate | 6/29/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$53,000 | WECC2011008992 | CIP-005-1 | R1 | Medium | Moderate | 7/31/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$53,000 | WECC2012010449 | CIP-005-1 | R2 | Medium | Minimal | 11/8/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$53,000 | WECC2012010450 | CIP-005-1 | R4 | Medium | Moderate | 11/8/2012 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | NPCC2011008334 | CIP-005-1 | R2.2 | Medium | Minimal | 11/2/2011 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$30,000 | NPCC2012009111 | CIP-005-1 | R2.2 | Medium | Minimal | 12/8/2011 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$25,000 | NPCC2012009113 | CIP-005-1 | R2.2 | Medium | Minimal | 4/26/2012 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | NPCC2011008438 | CIP-005-1 | R2.2 | Medium | Minimal | 12/22/2011 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$58,000 | WECC201103037 | CIP-006-1 | R1; R1.8 | Medium | Moderate | 8/10/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$53,000 | WECC201103031 | CIP-006-1 | R1; R1.8 | Medium | Moderate | 8/10/2012 | X |
| 4/30/2013 | NP13-33-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$15,000 | MRO2012009757 | CIP-006-1 | R1 | Medium | Moderate | 9/25/2012 | X |
| 4/30/2013 | NP13-33-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$10,000 | MRO2012009156 | CIP-006-1 | R1; R1.1 | Medium | Moderate | 12/22/2011 | X |
| 4/30/2013 | NP13-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012010322 | CIP-006-1 | R1 | Medium | Moderate | 7/24/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$58,000 | WECC2011008991 | CIP-006-2 | R3 | Medium | Minimal | 6/27/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$53,000 | WECC2011008993 | CIP-006-2 | R3 | Medium | Minimal | 6/27/2012 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$30,000 | NPCC2011008476 | CIP-006-3c | R5 | Medium | Minimal | 11/29/2011 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC2012009100 | CIP-007-1 | R3 | Lower | Moderate | 10/31/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC2012009099 | CIP-007-1 | R5; R5.1.3; R5.2.1; R5.2.3; R5.3.3 | Medium | Moderate | 8/31/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC2012010375 | CIP-007-1 | R7 | Lower | Moderate | 6/14/2013 (approved completion date) | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$58,000 | WECC201103038 | CIP-007-1 | R2 | Medium | Moderate | 5/31/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$58,000 | WECC2011009030 | CIP-007-1 | R3 | Lower | Moderate | 6/21/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$58,000 | WECC2011008639 | CIP-007-1 | R5 | Lower | Minimal | 5/30/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$58,000 | WECC2011008642 | CIP-007-1 | R8 | Medium | Minimal | 5/31/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$53,000 | WECC201103032 | CIP-007-1 | R2 | Medium | Moderate | 5/31/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$53,000 | WECC2011009032 | CIP-007-1 | R3 | Lower | Moderate | 6/21/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$53,000 | WECC2011008640 | CIP-007-1 | R5 | Lower | Minimal | 3/30/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$53,000 | WECC2011008641 | CIP-007-1 | R8 | Medium | Minimal | 5/31/2012 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | NPCC2011008340 | CIP-007-1 | R2.2 | Medium | Minimal | 11/2/2011 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$30,000 | NPCC2012009112 | CIP-007-1 | R2.2 | Medium | Minimal | 10/1/2012 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$30,000 | NPCC2012009119 | CIP-007-1 | R3.1; R3.2 | Medium | Minimal | 8/6/2012 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$30,000 | NPCC2012009120 | CIP-007-1 | R4.1; R4.2 | Medium | Minimal | 11/5/2012 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$30,000 | NPCC2012009121 | CIP-007-1 | R5.1; R5.1.1; R5.1.3; R5.2; R5.2.1; R5.3; R5.3.3 | Lower | Minimal | 9/4/2012 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$30,000 | NPCC2012009122 | CIP-007-1 | R6.5 | Lower | Minimal | 12/19/2011 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$25,000 | NPCC2012009114 | CIP-007-1 | R2.2 | Medium | Minimal | 5/31/2012 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$25,000 | NPCC2012009115 | CIP-007-1 | R3.1; R3.2 | Medium | Minimal | 8/6/2012 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$25,000 | NPCC2012009116 | CIP-007-1 | R4.1; R4.2 | Medium | Minimal | 11/15/2012 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|--|---|--|--------------------------------------|------------------------------------|
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$25,000 | NPCC2012009117 | CIP-007-1 | R5.1; R5.1.1; R5.1.3; R5.2; R5.2.1; R5.3; R5.3.3 | Lower | Minimal | 9/17/2012 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$25,000 | NPCC2012009118 | CIP-007-1 | R6.5 | Lower | Minimal | 2/29/2012 | X |
| 4/30/2013 | NP13-33-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$10,000 | MRO201100439 | CIP-007-1 | R5.3; R5.3.2; R5.3.3 | Lower | Moderate | 3/26/2012 | X |
| 4/30/2013 | NP13-33-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$10,000 | MRO2012010180 | CIP-007-1 | R5.3; R5.3.3 | Lower | Minimal | 3/26/2012 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | NPCC2011008439 | CIP-007-1 | R2.2 | Medium | Minimal | 12/22/2011 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | NPCC2011008440 | CIP-007-1 | R3.1; R3.2 | Medium | Minimal | 7/8/2012 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | NPCC2012009937 | CIP-007-3 | R5; R5.3.3 | Lower | Minimal | 3/19/2012 | X |
| 4/30/2013 | NP13-33-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | NPCC2012010466 | CIP-007-3 | R3; R3.1 | Lower | Minimal | 7/2/2012 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$58,000 | WECC201103025 | CIP-008-1 | R1; R1.4; R1.5; R1.6 | Lower | Minimal | 10/31/2011 | X |
| 4/30/2013 | NP13-33-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$53,000 | WECC201103026 | CIP-008-1 | R1; R1.4; R1.5; R1.6 | Lower | Minimal | 10/31/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100424 | CIP-002-1 | R3 | High | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100425 | CIP-002-1 | R4 | Lower | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100426 | CIP-003-1 | R1 | Medium | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100428 | CIP-003-1 | R4 | Medium | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100429 | CIP-003-1 | R5 | Lower | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100430 | CIP-003-1 | R6 | Lower | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100431 | CIP-004-1 | R4 | Lower | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100432 | CIP-004-2 | R3 | Lower | Minimal | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100433 | CIP-005-1 | R1 | Medium | Minimal | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100436 | CIP-005-1 | R4 | Medium | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100437 | CIP-005-1 | R5 | Lower | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100438 | CIP-006-1 | R1 | Medium | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100446 | CIP-007-1 | R1 | Medium | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100447 | CIP-007-1 | R2 | Medium | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100448 | CIP-007-1 | R3 | Lower | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100449 | CIP-007-1 | R5 | Lower | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100450 | CIP-007-1 | R8 | Lower | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100451 | CIP-007-1 | R9 | Lower | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100452 | CIP-007-2a | R7 | Lower | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100453 | CIP-008-1 | R1 | Lower | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100454 | CIP-009-1 | R1 | Medium | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100455 | CIP-009-1 | R2 | Lower | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100457 | CIP-009-1 | R4 | Lower | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$137,000 | TRE201100458 | CIP-009-1 | R5 | Lower | Moderate | 8/2/2011 | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102568 | CIP-002-1 | R3 | High | Minimal | 12/15/2011 | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102582 | CIP-003-1 | R3 | Lower | Minimal | 11/26/2012 | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102581 | CIP-003-1 | R4 | Lower | Minimal | 5/9/2013 | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102587 | CIP-003-1 | R5 | Lower | Minimal | 5/9/2013 | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102569 | CIP-003-2 | R1.2 | Lower | Minimal | 2/18/2011 | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102589 | CIP-004-1 | R2 | Medium | Moderate | 3/1/2012 | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102591 | CIP-004-1 | R4 | Lower | Minimal | 5/31/2013 (approved completion date) | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102574 | CIP-005-1 | R1 | Medium | Minimal | 5/31/2013 (approved completion date) | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102596 | CIP-006-1 | R1 | Medium | Minimal | 5/17/2013 (approved completion date) | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102578 | CIP-007-1 | R1 | Medium | Moderate | 5/14/2013 | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102579 | CIP-007-1 | R2 | Medium | Moderate | 5/15/2013 | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102580 | CIP-007-1 | R3 | Lower | Moderate | 5/15/2013 | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201002549 | CIP-007-1 | R5 | Medium | Minimal | 5/31/2013 (approved completion date) | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102592 | CIP-007-1 | R6 | Medium | Moderate | 5/15/2013 | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102837 | CIP-007-1 | R8 | Lower | Minimal | 5/21/2010 | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102550 | CIP-007-1 | R9 | Lower | Minimal | 11/27/2012 | X |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$291,000 | WECC201102556 | CIP-009-1 | R5 | Lower | Minimal | 8/26/2011 | X |
| 5/30/2013 | NP13-39-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2013012141 | CIP-002-1 | R1; R1.1 | Lower | Minimal | 12/28/2012 | X |
| 5/30/2013 | NP13-39-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2013012139 | CIP-002-1 | R1; R1.1 | Lower | Minimal | 12/28/2012 | X |
| 5/30/2013 | NP13-39-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$62,500 | WECC201102616 | CIP-004-3 | R3 | Medium | Minimal | 5/5/2011 | X |
| 5/30/2013 | NP13-39-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$62,500 | WECC201102901 | CIP-005-1 | R2; R2.4; R2.6 | Medium | Moderate | 12/11/2012 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|----------------------------------|---|---|---|----------------------|--|---|--|----------------------------|------------------------------------|
| 5/30/2013 | NP13-39-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012011278 | CIP-005-1 | R1; R1.5 | Medium | Moderate | 11/15/2012 | X |
| 5/30/2013 | NP13-39-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$62,500 | WECC201102902 | CIP-006-1 | R1.8 | Lower | Minimal | 12/11/2011 | X |
| 5/30/2013 | NP13-39-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$62,500 | WECC201102903 | CIP-006-1 | R3 | Medium | Moderate | 3/22/2012 | X |
| 5/30/2013 | NP13-39-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | SERC2011008332 | CIP-006-1 | R1 | Medium | Minimal | 12/31/2012 | X |
| 5/30/2013 | NP13-39-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012011280 | CIP-006-1 | R1; R1.8 | Medium | Moderate | 11/15/2012 | X |
| 5/30/2013 | NP13-39-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$62,500 | WECC201102859 | CIP-006-3c | R1.4 | Medium | Minimal | 7/14/2011 | X |
| 5/30/2013 | NP13-39-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$62,500 | WECC201102904 | CIP-007-1 | R5 | Lower | Minimal | 8/31/2012 | X |
| 5/30/2013 | NP13-39-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$62,500 | WECC201102905 | CIP-007-1 | R8 | Lower | Minimal | 5/30/2012 | X |
| 5/30/2013 | NP13-39-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | SERC201000561 | CIP-007-1 | R5 | Lower | Minimal | 10/27/2010 | X |
| 6/27/2013 | NP13-41-0000 | RF, MRO | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX, NCRXXXXX | \$20,000 | RFC2012010401 | CIP-002-3 | R3 | High | Minimal | 4/30/2012 | X |
| 6/27/2013 | NP13-41-0000 | RF, MRO | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX, NCRXXXXX | \$20,000 | RFC2012011588; RFC20120111589 | CIP-003-3 | R5 | Lower | Moderate | 1/18/2013 | X |
| 6/27/2013 | NP13-41-0000 | RF, MRO | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX, NCRXXXXX | \$20,000 | RFC2012010403 | CIP-003-3 | R6 | Lower; | Moderate | 12/13/2012 | X |
| 6/27/2013 | NP13-41-0000 | RF, MRO | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX, NCRXXXXX | \$20,000 | RFC2012011446; RFC2012011447; RFC2012011448 | CIP-004-1 | R3 | Medium | Moderate | 4/30/2013 | X |
| 6/27/2013 | NP13-41-0000 | RF, MRO | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX, NCRXXXXX | \$20,000 | RFC2012010773 | CIP-007-3 | R2 | Medium | Moderate | 12/13/2012 | X |
| 6/27/2013 | NP13-41-0000 | RF, MRO | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX, NCRXXXXX, NCRXXXXX | \$20,000 | RFC2012011281 | CIP-007-3 | R1 | Medium | Moderate | 12/13/2012 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$36,000 | WECC201103043 | CIP-003-3 | R6 | Lower | Minimal | 2/10/2012 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | WECC2012009396 | CIP-004-3 | R4; R4.1;R4.2 | Lower | Minimal | 11/29/2012 | X |
| 6/27/2013 | NP13-41-0000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$7,000 | NPCC2011007727 | CIP-005-1 | R2; R2.2 | Medium | Moderate | 10/31/2011 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$36,000 | WECC2012010299 | CIP-005-3a | R5 | Lower | Minimal | 5/25/2012 | X |
| 6/27/2013 | NP13-41-0000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$7,000 | NPCC2011007867 | CIP-006-1 | R1; R1.8 | Medium | Minimal | 5/31/2011 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC2012010702 | CIP-006-2a | R2; R2.2 | Medium | Minimal | 1/10/2013 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | WECC2012010362 | CIP-006-3c | R2 | Medium | Minimal | 8/31/2012 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | WECC2012009729 | CIP-006-3c | R1 | Medium | Minimal | 11/14/2011 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC2012009105 | CIP-007-1 | R2 | Medium | Minimal | 11/16/2012 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC2012009106 | CIP-007-1 | R3; R3.2 | Lower | Moderate | 7/9/2012 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC2012011414 | CIP-007-1 | R4 | Lower | Minimal | 11/30/2012 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC2012009107 | CIP-007-1 | R5; 5.1.3; R5.2.3; R5.3.2 and R5.3.3 | Medium | Moderate | 11/1/2012 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$36,000 | WECC2012010371 | CIP-007-1 | R2 | Medium | Minimal | 6/22/2012 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$36,000 | WECC2012010367 | CIP-007-1 | R5 | Lower | Minimal | 7/11/2012 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$36,000 | WECC2012010370 | CIP-007-1 | R6 | Lower | Minimal | 6/22/2012 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$36,000 | WECC2012010006 | CIP-007-1 | R8 | Lower | Minimal | 6/25/2012 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | WECC2012011087 | CIP-007-3 | R5; R5.1.1; R5.3.3 | Medium | Minimal | 12/14/2012 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | WECC2012011396 | CIP-007-3 | R7 | Lower | Minimal | 1/31/2013 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$36,000 | WECC2012010366 | CIP-007-3 | R1 | Medium | Minimal | 7/11/2012 | X |
| 6/27/2013 | NP13-41-0000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC2012011417 | CIP-007-3a | R8 | Lower | Moderate | 11/9/2012 | X |
| 7/31/2013 | NP13-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$198,000 | WECC2011008651 | CIP-004-1 | R4 | Lower | Moderate | 2/5/2013 | X |
| 7/31/2013 | NP13-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$198,000 | WECC2011008652 | CIP-005-1 | R1 | Medium | Moderate | TBD | X |
| 7/31/2013 | NP13-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$198,000 | WECC2011008653 | CIP-005-1 | R2 | Medium | Moderate | TBD | X |
| 7/31/2013 | NP13-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$198,000 | WECC2011008654 | CIP-005-3 | R3 | Medium | Minimal | 3/9/2012 | X |
| 7/31/2013 | NP13-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$198,000 | WECC2012011489 | CIP-006-1 | R1 | Medium | Minimal | 3/14/2013 | X |
| 7/31/2013 | NP13-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$198,000 | WECC2011008657 | CIP-007-1 | R2 | Medium | Moderate | 10/5/2012 | X |
| 7/31/2013 | NP13-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$198,000 | WECC2011008658 | CIP-007-1 | R3 | Lower | Moderate | 10/5/2012 | X |
| 7/31/2013 | NP13-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$198,000 | WECC2011008659 | CIP-007-1 | R4 | Medium | Moderate | 2/25/2013 | X |
| 7/31/2013 | NP13-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$198,000 | WECC2011008660 | CIP-007-1 | R5 | Medium | Moderate | 12/28/2012 | X |
| 7/31/2013 | NP13-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$198,000 | WECC2011008661 | CIP-007-1 | R6 | Lower | Moderate | 10/5/2012 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|----------------------------------|--|---|-------------------|----------------------|-----|---|--|---------------------------------------|------------------------------------|
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2011001057 | CIP-002-3 | R3 | High | Serious | 12/31/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2011001243 | CIP-002-3 | R3 | High | Serious | 6/29/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2012001319 | CIP-002-3 | R3 | High | Serious | 1/31/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011008000 | CIP-002-3 | R3 | High | Serious | 1/31/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011007525 | CIP-002-3 | R3 | High | Serious | 1/31/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2011001058 | CIP-003-3 | R4 | Medium | Moderate | 2/14/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011007658 | CIP-003-3 | R4 | Medium | Moderate | 2/14/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2012010396 | CIP-003-3 | R5 | Lower | Moderate | 12/31/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2013011704 | CIP-003-3 | R5 | Lower | Moderate | 12/31/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2012009880 | CIP-003-3 | R6 | Lower | Moderate | 1/10/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2013011710 | CIP-003-3 | R6 | Lower | Moderate | 1/10/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011008269 | CIP-003-3 | R6 | Lower | Moderate | 1/10/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2011001244 | CIP-004-3 | R4 | Lower | Minimal | 12/18/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2011001264 | CIP-004-3 | R4 | Lower | Minimal | 1/31/2014 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2013011705 | CIP-004-3 | R4 | Lower | Minimal | 1/31/2014 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC201000506 | CIP-004-3 | R4 | Lower | Minimal | 1/31/2014 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC201100876 | CIP-005-3 | R1 | Medium | Moderate | 7/30/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2012001318 | CIP-005-3 | R1 | Medium | Minimal | 5/8/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011007571 | CIP-005-3 | R1 | Medium | Moderate | 5/8/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2012001317 | CIP-005-3 | R2 | Medium | Moderate | 8/20/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011008270 | CIP-005-3 | R2 | Medium | Moderate | 8/20/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2012010397 | CIP-005-3 | R5 | Lower | Minimal | 2/11/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC201100877 | CIP-005-3a | R4 | Medium | Moderate | 8/29/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011007871 | CIP-005-3a | R4 | Medium | Moderate | 8/29/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2012001316 | CIP-005-3a | R3 | Medium | Moderate | 4/30/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC201100878 | CIP-006-3 | R1 | Medium | Minimal | 12/30/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2013011711 | CIP-006-3 | R1 | Medium | Minimal | 12/30/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2013011771 | CIP-006-3 | R1 | Medium | Moderate | 12/30/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011007872 | CIP-006-3 | R1 | Medium | Minimal | 12/30/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011008001 | CIP-006-3 | R1 | Medium | Minimal | 12/30/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC201100879 | CIP-006-3 | R2 | Medium | Moderate | 8/20/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011007881 | CIP-006-3 | R2 | Medium | Minimal | 12/30/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC201100880 | CIP-006-3 | R4 | Medium | Moderate | 3/25/2011 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2012010022 | CIP-006-3c | R5 | Medium | Moderate | 5/8/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2013011723 | CIP-006-3c | R5 | Medium | Moderate | 8/15/2012 | X |

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|-------------|---------------|-----------------|----------------------------------|--|---|-------------------|----------------------|----------------|---|--|--------------------------------------|------------------------------------|
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2012009881 | CIP-007-3 | R1 | Medium | Moderate | 2/25/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2012001315 | CIP-007-3 | R2 | Medium | Moderate | 12/13/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2011001112 | CIP-007-3 | R3 | Lower | Moderate | 12/13/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011007998 | CIP-007-3 | R3 | Lower | Moderate | 12/13/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2011001060 | CIP-007-3 | R4 | Medium | Moderate | 12/7/2011 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011007574 | CIP-007-3 | R4 | Medium | Moderate | 12/7/2011 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC201100881 | CIP-007-3 | R5 | Lower | Minimal | 8/27/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2011001062 | CIP-007-3 | R5 | Lower | Moderate | 8/31/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2011001113 | CIP-007-3 | R5 | Lower | Minimal | 8/27/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2012001314 | CIP-007-3 | R5 | Lower | Moderate | 7/31/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011007981 | CIP-007-3 | R5 | Lower | Moderate | 7/31/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011007570 | CIP-007-3 | R5 | Lower | Minimal | 7/31/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011007573 | CIP-007-3 | R5 | Lower | Moderate | 7/31/2013 (approved completion date) | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC201100882 | CIP-007-3 | R6 | Lower | Moderate | 12/7/2011 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2011001064 | CIP-007-3 | R6 | Lower | Moderate | 12/7/2011 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2011001114 | CIP-007-3 | R6 | Lower | Moderate | 3/28/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011007880 | CIP-007-3 | R6 | Lower | Moderate | 3/28/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011007572 | CIP-007-3 | R6 | Lower | Moderate | 3/28/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011008002 | CIP-007-3 | R6 | Lower | Moderate | 3/28/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011008272 | CIP-007-3 | R6 | Lower | Minimal | 3/28/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC201100883 | CIP-007-3a | R8 | Lower | Moderate | 8/17/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2011001245 | CIP-007-3a | R8 | Lower | Minimal | 8/17/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2011007870 | CIP-007-3a | R8 | Lower | Moderate | 8/17/2012 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2012010398 | CIP-008-3 | R1 | Lower | Moderate | 1/17/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2013011712 | CIP-008-3 | R1 | Lower | Moderate | 1/17/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | RFC2012010400 | CIP-009-3 | R5 | Lower | Moderate | 5/2/2013 | X |
| 7/31/2013 | NP13-46-000 | RF, SERC | Unidentified Registered Entities | NCRXXXXX, NCRXXXXX | \$350,000 | SERC2013011709 | CIP-009-3 | R5 | Lower | Moderate | 5/2/2013 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201100340 | CIP-002-1 | R1; R1.2.1 | Medium | Minimal | 2/1/2013 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201100343 | CIP-003-1 | R6 | Lower | Minimal | 2/1/2013 | X |
| 7/31/2013 | NP13-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$15,000 | WECC2013011961 | CIP-004-1 | R4 | Lower | Minimal | 2/24/2013 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201100344 | CIP-004-1 | R3 | Medium | Minimal | 2/1/2013 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201100345 | CIP-004-1 | R4; R4.1 | Lower | Minimal | 2/1/2013 | X |
| 7/31/2013 | NP13-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | WECC2012010414 | CIP-004-3 | R4; R4.1; R4.2 | Lower | Minimal | 9/5/2012 | X |
| 7/31/2013 | NP13-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC2013012167 | CIP-005-1 | R1 | Medium | Minimal | 5/3/2013 | X |
| 7/31/2013 | NP13-47-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$15,000 | SPP2012009927 | CIP-005-1 | R3; R3.2 | Medium | Minimal | 9/7/2012 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201100346 | CIP-005-1 | R1; R1.5 | Medium | Minimal | 2/1/2013 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201100347 | CIP-005-1 | R2; R2.2 | Medium | Minimal | 2/1/2013 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201100348 | CIP-005-1 | R3; R3.2 | Medium | Minimal | 2/1/2013 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO201100349 | CIP-005-1 | R4.2; R4.5 | Medium | Minimal | 2/1/2013 | X |
| 7/31/2013 | NP13-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC2013012168 | CIP-005-3 | R2; R2.1 | Medium | Minimal | 5/3/2013 | X |
| 7/31/2013 | NP13-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC2013011953 | CIP-005-3a | R1; R1.5 | Medium | Minimal | 2/14/2013 | X |

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|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|--|---|--|---------------------------------------|------------------------------------|
| 7/31/2013 | NP13-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$17,000 | WECC2012009451 | CIP-005-3a | R1; R1.5 | Medium | Minimal | 6/28/2012 | X |
| 7/31/2013 | NP13-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$17,000 | WECC2012009453 | CIP-005-3a | R5; R5.2; R5.3 | Lower | Minimal | 6/28/2012 | X |
| 7/31/2013 | NP13-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC2013011954 | CIP-006-3c | R2; R2.2 | Medium | Minimal | 2/13/2013 | X |
| 7/31/2013 | NP13-47-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$15,000 | SPP2012009936 | CIP-007-1 | R6; R6.1; R6.2; R6.3; R6.4; R6.5 | Medium; | Minimal | 7/25/2012 | X |
| 7/31/2013 | NP13-47-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$15,000 | SPP2012011103 | CIP-007-1 | R3.2 | Lower | Minimal | 4/11/2012 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO2011100352 | CIP-007-1 | R1; R1.1; R1.2; R1.3 | Medium | Minimal | 2/1/2013 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO2011100353 | CIP-007-1 | R2; R2.2 | Medium | Minimal | 2/1/2013 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO2011100354 | CIP-007-1 | R3 | Lower | Minimal | 2/1/2013 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO2011100355 | CIP-007-1 | R4; R4.2 | Medium | Minimal | 2/1/2013 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO2011100357 | CIP-007-1 | R6; R6.2; R6.4 | Lower | Minimal | 2/1/2013 | X |
| 7/31/2013 | NP13-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC2013011959 | CIP-007-1 | R5; R5.3.3 | Medium | Minimal | 2/22/2013 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO2011100356 | CIP-007-1 | R5; R5.1.1; R5.1.2; R5.1.3; R5.2; R5.2.1; R5.2.3 | Lower | Minimal | 2/1/2013 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO2011100358 | CIP-007-1 | R8; R8.2; R8.3; R8.4 | Lower | Minimal | 2/1/2013 | X |
| 7/31/2013 | NP13-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC2013011958 | CIP-007-3a | R1 | Medium | Minimal | 2/14/2013 | X |
| 7/31/2013 | NP13-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$17,000 | WECC2012009459 | CIP-007-3a | R6; R6.3 | Medium | Minimal | 6/28/2012 | X |
| 7/31/2013 | NP13-47-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$15,000 | SPP2011008257 | CIP-007-3a | R2; 2.1; 2.2 | Medium | Minimal | 7/16/2012 | X |
| 7/31/2013 | NP13-47-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO2011100359 | CIP-009-1 | R4 | Lower | Minimal | 2/1/2013 | X |
| 8/30/2013 | NP13-51-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$6,000 | MRO201100371 | CIP-002-1 | R3 | High | Minimal | 9/10/2012 | X |
| 8/30/2013 | NP13-51-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$4,800 | TRE2012010292 | CIP-004-1 | R4 | Lower | Moderate | 12/31/2010 | X |
| 8/30/2013 | NP13-51-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | FRCC2011008323 | CIP-005-1 | R1.5 | Medium | Moderate | 3/14/2012 | X |
| 8/30/2013 | NP13-51-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | FRCC2012010357 | CIP-005-1 | R2; R2.1; R2.2; R2.3; R2.4 | Medium | Moderate | 2/21/2013 | X |
| 8/30/2013 | NP13-51-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | FRCC2012010359 | CIP-005-1 | R3; R3.1; R3.2 | Medium | Moderate | 5/14/2013 | X |
| 8/30/2013 | NP13-51-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$17,200 | TRE201100556 | CIP-005-1 | R4; R4.3 | Medium | Moderate | 9/1/2011 | X |
| 8/30/2013 | NP13-51-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$20,000 | WECC2012010764 | CIP-005-2 | R3 | Medium | Minimal | 3/28/2012 | X |
| 8/30/2013 | NP13-51-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | FRCC2011008324 | CIP-006-1 | R1.1 | Medium | Moderate | 12/30/2011 | X |
| 8/30/2013 | NP13-51-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | FRCC2011008325 | CIP-006-1 | R1.8 | Lower | Moderate | 10/2/2012 | X |
| 8/30/2013 | NP13-51-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | FRCC2011008326 | CIP-007-1 | R2; R2.1; R2.2 | Medium | Moderate | 8/30/2012 | X |
| 8/30/2013 | NP13-51-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | FRCC2012010358 | CIP-007-1 | R3; R3.1; R3.2 | Lower | Moderate | 12/20/2013 (approved completion date) | X |
| 8/30/2013 | NP13-51-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$17,200 | TRE201100559 | CIP-007-1 | R8 | Lower | Moderate | 7/11/2013 | X |
| 8/30/2013 | NP13-51-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$15,000 | TRE201100470 | CIP-007-2a | R2 | Medium | Moderate | 12/22/2011 | X |
| 8/30/2013 | NP13-51-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$15,000 | TRE201100472 | CIP-007-2a | R8; R8.2 | Medium | Moderate | 12/22/2011 | X |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC2013012117 | CIP-002-3 | R1 | Medium | Minimal | 4/4/2013 | X |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC2012010602 | CIP-003-1 | R6 | Lower | Moderate | 12/6/2012 | X |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC2012010757 | CIP-004-1 | R4 | Lower | Moderate | 10/23/2012 | X |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC2012010596 | CIP-005-1 | R1 | Medium | Moderate | 1/24/2013 | X |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC2012010597 | CIP-005-1 | R2 | Medium | Minimal | 2/21/2013 | X |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC2012010748 | CIP-005-1 | R4 | Medium | Moderate | 8/30/2012 | X |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC2012010758 | CIP-006-1 | R1 | Medium | Moderate | 1/18/2013 | X |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC2012010735 | CIP-006-1 | R6 | Medium | Moderate | 10/26/2012 | X |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC2012010600 | CIP-007-1 | R1 | Medium | Moderate | 12/14/2012 | X |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC2012010601 | CIP-007-1 | R3 | Lower | Moderate | 4/16/2013 | X |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC2012010752 | CIP-007-1 | R8 | Medium | Moderate | 1/24/2013 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------------------|---|--|----------------------------|------------------------------------|
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | WECC2012010747 | CIP-008-1 | R1 | Lower | Minimal | 11/14/2012 | X |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | WECC2012010603 | CIP-009-1 | R1 | Medium | Moderate | 8/22/2012 | X |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | WECC2012010749 | CIP-009-1 | R2 | Lower | Moderate | 8/22/2012 | X |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | WECC2012010756 | CIP-009-1 | R4 | Lower | Moderate | 8/22/2012 | X |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | WECC2012010755 | CIP-009-1 | R5 | Lower | Moderate | 8/22/2012 | X |
| 9/30/2013 | NP13-57-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010161 | CIP-003-3 | R6 | Lower | Moderate | 3/18/2013 | X |
| 9/30/2013 | NP13-57-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010174 | CIP-003-3 | R6 | Lower | Moderate | 3/18/2013 | X |
| 9/30/2013 | NP13-57-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$34,000 | MRO201100312 | CIP-004-1 | R3; R3.1 | Lower | Moderate | 5/25/2012 | X |
| 9/30/2013 | NP13-57-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | WECC2012009389 | CIP-004-1 | R4 | Lower | Minimal | 6/9/2011 | X |
| 9/30/2013 | NP13-57-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$100,000 | FRCC2011008539 | CIP-005-1 | R2; R2.1; R2.2 | Medium | Moderate | 2/28/2013 | X |
| 9/30/2013 | NP13-57-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$100,000 | FRCC2012011023 | CIP-005-1 | R1; R1.5; R1.6 | Medium | Moderate | 7/11/2013 | X |
| 9/30/2013 | NP13-57-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010162 | CIP-005-3 | R4 | Medium | Minimal | 12/21/2012 | X |
| 9/30/2013 | NP13-57-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010175 | CIP-005-3 | R4 | Medium | Minimal | 12/21/2012 | X |
| 9/30/2013 | NP13-57-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$100,000 | FRCC2012011050 | CIP-005-3a | R3; R3.2 | Medium | Minimal | 6/27/2013 | X |
| 9/30/2013 | NP13-57-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$100,000 | FRCC2012011024 | CIP-006-1 | R1; R1.8 | Lower | Moderate | 7/11/2013 | X |
| 9/30/2013 | NP13-57-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | WECC2012009391 | CIP-006-3a | R5 | Medium | Minimal | 6/27/2012 | X |
| 9/30/2013 | NP13-57-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010165 | CIP-006-3a | R2; R2.2 | Medium | Moderate | 3/18/2013 | X |
| 9/30/2013 | NP13-57-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010176 | CIP-006-3a | R2; R2.2 | Medium | Moderate | 3/18/2013 | X |
| 9/30/2013 | NP13-57-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$100,000 | FRCC2012010625 | CIP-007-1 | R6; R6.1; R6.2; R6.4; R6.5 | Medium | Moderate | 12/14/2012 | X |
| 9/30/2013 | NP13-57-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$34,000 | MRO201100314 | CIP-007-1 | R3 | Lower | Moderate | 12/21/2012 | X |
| 9/30/2013 | NP13-57-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$34,000 | MRO201100315 | CIP-007-1 | R5 | Lower | Moderate | 12/31/2012 | X |
| 9/30/2013 | NP13-57-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | WECC2013012047 | CIP-007-1 | R5 | Medium | Moderate | 6/28/2013 | X |
| 9/30/2013 | NP13-57-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | WECC2012009392 | CIP-007-1 | R5; R5.2.3 | Lower | Minimal | 6/28/2012 | X |
| 9/30/2013 | NP13-57-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$100,000 | FRCC2012010621 | CIP-007-3 | R2; R2.1; R2.2; R2.3 | Medium | Moderate | 3/31/2013 | X |
| 9/30/2013 | NP13-57-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$100,000 | FRCC2012010626 | CIP-007-3 | R8; R8.2 | Medium | Minimal | 3/31/2013 | X |
| 9/30/2013 | NP13-57-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | WECC2013012045 | CIP-007-3a | R2; R2.1; R2.2 | Medium | Minimal | 6/28/2013 | X |
| 9/30/2013 | NP13-57-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | WECC2013012055 | CIP-007-3a | R2 | Medium | Minimal | 6/28/2013 | X |
| 9/30/2013 | NP13-57-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010163 | CIP-007-3a | R1 | Medium | Minimal | 9/21/2012 | X |
| 9/30/2013 | NP13-57-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010164 | CIP-007-3a | R8.2 | Medium | Minimal | 12/21/2012 | X |
| 9/30/2013 | NP13-57-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010166 | CIP-007-3a | R3 | Lower | Moderate | 12/11/2012 | X |
| 9/30/2013 | NP13-57-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010172 | CIP-007-3a | R3 | Lower | Moderate | 12/21/2012 | X |
| 9/30/2013 | NP13-57-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010173 | CIP-007-3a | R8.2 | Medium | Minimal | 12/21/2012 | X |
| 9/30/2013 | NP13-57-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010177 | CIP-007-3a | R1 | Medium | Minimal | 9/21/2012 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2011001224 | CIP-003-1 | R6 | Lower | Moderate | 6/20/2012 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010168 | CIP-003-1 | R6 | Lower | Moderate | 5/8/2013 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010104 | CIP-003-1 | R6 | Lower | Moderate | 5/8/2013 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$41,000 | SERC2011008285 | CIP-004-1 | R4, R4.2 | Lower | Minimal | 3/17/2011 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$14,000 | SERC2011008287 | CIP-004-1 | R4, R4.2 | Lower | Minimal | 3/17/2011 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$41,000 | SERC2012010509 | CIP-004-2 | R4, R4.2 | Lower | Minimal | 3/16/2012 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$41,000 | SERC2013011762 | CIP-004-3 | R4, R4.2 | Lower | Minimal | 4/6/2013 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012011566 | CIP-004-3 | R4; R4.1; R4.2 | Lower | Minimal | 7/31/2013 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$41,000 | SERC201000751 | CIP-005-1 | R1, R1.6 | Medium | Moderate | 2/28/2011 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2011001225 | CIP-005-1 | R1; R1.1; R1.5 | Medium | Minimal | 3/16/2012 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010169 | CIP-005-1 | R4 | Medium | Minimal | 5/31/2012 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010105 | CIP-005-1 | R4; R4.2 | Medium | Minimal | 5/31/2012 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$41,000 | SERC2012011334 | CIP-006-1 | R1, R1.8 | Medium | Moderate | 3/30/2012 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$41,000 | SERC2013011764 | CIP-006-1 | R1; R1.8 | Medium | Minimal | 8/1/2013 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$14,000 | SERC2012011335 | CIP-006-1 | R1; R1.8 | Medium | Moderate | 3/30/2012 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$14,000 | SERC2013011755 | CIP-006-1 | R1; R1.8 | Medium | Minimal | 6/26/2012 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012010103 | CIP-006-1 | R2 | Medium | Moderate | 12/14/2012 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2011001271 | CIP-006-1 | R2; R2.2 | Medium | Moderate | 12/14/2012 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$41,000 | SERC2013011766 | CIP-006-3c | R2; R2.2 | Medium | Minimal | 10/18/2012 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$14,000 | SERC2013011757 | CIP-006-3c | R2; R2.2 | Medium | Minimal | 6/26/2012 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012173 | CIP-006-3c | R5 | Medium | Minimal | 8/30/2013 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$41,000 | SERC201000743 | CIP-007-1 | R4, R4.1 | Medium | Minimal | 2/28/2011 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$41,000 | SERC2011008331 | CIP-007-1 | R3, R3.1 | Lower | Moderate | 3/27/2012 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|--------------------------------|---|--|--------------------------------------|------------------------------------|
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$41,000 | SERC2012009651 | CIP-007-1 | R2, R2.1 | Medium | Minimal | 5/8/2012 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$41,000 | SERC2013011767 | CIP-007-1 | R2, R2.1 | Medium | Moderate | 3/14/2013 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$14,000 | SERC201000603 | CIP-007-1 | R6; R6.4 | Lower | Moderate | 11/29/2010 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$14,000 | SERC2012009650 | CIP-007-1 | R2; R2.1 | Medium | Minimal | 1/18/2012 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2011001230 | CIP-007-1 | R1; R1.3 | Medium | Moderate | 5/14/2012 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2011001237 | CIP-007-1 | R8 | Medium | Moderate | 5/14/2012 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012010167 | CIP-007-1 | R8; R8.2 | Medium | Minimal | 7/31/2012 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012010170 | CIP-007-1 | R3 | Lower | Minimal | 7/31/2012 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012010171 | CIP-007-1 | R1 | Medium | Minimal | 8/20/2012 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012010106 | CIP-007-1 | R1 | Medium | Minimal | 8/20/2012 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012010107 | CIP-007-1 | R3 | Lower | Minimal | 7/31/2012 | X |
| 10/30/2013 | NP14-4-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012010109 | CIP-007-1 | R8 | Medium | Minimal | 6/4/2012 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$41,000 | SERC2013011760 | CIP-007-3a | R3; R3.1 | Lower | Moderate | 10/18/2012 | X |
| 10/30/2013 | NP14-4-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$14,000 | SERC2012010581 | CIP-007-3a | R3; R3.1 | Lower | Minimal | 11/18/2011 | X |
| 10/30/2013 | NP14-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000288 | CIP-004-1 | R2 | Lower | Minimal | 2/23/2010 | X |
| 10/30/2013 | NP14-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000289 | CIP-004-1 | R3; R3.3 | Lower | Minimal | 12/27/2010 | X |
| 10/30/2013 | NP14-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC201000290 | CIP-004-1 | R4 | Lower | Minimal | 7/31/2012 | X |
| 10/30/2013 | NP14-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012010329 | CIP-004-3 | R4 | Lower | Minimal | 7/31/2012 | X |
| 10/30/2013 | NP14-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012011205 | CIP-007-3 | R3; R3.1 | Lower | Moderate | 5/8/2013 | X |
| 10/30/2013 | NP14-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012010349 | CIP-007-3a | R1; R1.1 | Medium | Minimal | 9/26/2012 | X |
| 10/30/2013 | NP14-5-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2012010350 | CIP-007-3a | R5; R5.2.2; R5.3.3 | Lower | Moderate | 10/1/2012 | X |
| 11/27/2013 | NP14-6-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2013012425 | CIP-003-1 | R4 | Lower | Moderate | 9/16/2013 | X |
| 11/27/2013 | NP14-6-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC2012011176 | CIP-005-1 | R2; R2.1, R2.2 | Medium | Moderate | 4/30/2013 | X |
| 11/27/2013 | NP14-6-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2013012426 | CIP-005-1 | R1 | Medium | Moderate | 3/30/2014 (approved completion date) | X |
| 11/27/2013 | NP14-6-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | WECC2012009993 | CIP-006-1 | R1 | Medium | Minimal | 8/1/2012 | X |
| 11/27/2013 | NP14-6-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$2,000 | FRCC2011008540 | CIP-006-1 | R1; R1.8 | Lower | Moderate | 9/30/2013 | X |
| 11/27/2013 | NP14-6-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$40,000 | WECC2013012109 | CIP-006-3c | R2; R2.2 | Medium | Minimal | 3/27/2013 | X |
| 11/27/2013 | NP14-6-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2013012421 | CIP-007-1 | R3; R3.1; R3.2 | Lower | Moderate | 6/14/2013 | X |
| 11/27/2013 | NP14-6-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC2012010896 | CIP-007-3 | R4 | Medium | Moderate | 6/11/2013 | X |
| 11/27/2013 | NP14-6-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$40,000 | WECC2013012110 | CIP-007-3a | R3; R3.1 | Lower | Minimal | 3/27/2013 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$15,000 | SERC201000512 | CIP-002-1 | R2 | High | Moderate | 7/19/2012 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$74,500 | SPP2011008244 | CIP-003-1 | R5; R5.2; R5.3 | Lower | Moderate | 7/1/2013 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$70,000 | SERC2011008320 | CIP-004-3 | R4; R4.2 | Lower | Minimal | 11/7/2012 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$74,500 | SPP2011008247 | CIP-005-1 | R1; R1.1; R1.4; R1.5; R1.6 | Medium | Moderate | 7/25/2013 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$74,500 | SPP2011008248 | CIP-005-1 | R2; R2.2; R2.5.2; R2.5.3; R2.6 | Medium | Moderate | 6/17/2013 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$74,500 | SPP2011008249 | CIP-005-1 | R3.2 | Medium | Moderate | 7/29/2013 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$74,500 | SPP2011008250 | CIP-005-1 | R4.3 | Medium | Moderate | 5/31/2013 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$70,000 | SERC2011006644 | CIP-005-1 | R2; R2.2 | Medium | Moderate | 4/3/2012 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$70,000 | SERC2011006647 | CIP-005-1 | R4; R4.2; R4.3; R4.4; R4.5 | Medium | Moderate | 4/12/2012 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$70,000 | SERC2011007279 | CIP-005-1 | R1; R1.5 | Medium | Moderate | 9/17/2013 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$70,000 | SERC2011008319 | CIP-005-1 | R2 | Medium | Minimal | 12/10/2012 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$70,000 | SERC2011009000 | CIP-005-1 | R3 | Medium | Moderate | 11/29/2012 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | SERC2011006614 | CIP-005-1 | R2; R2.2 | Medium | Moderate | 9/29/2011 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | SERC2011006615 | CIP-005-1 | R2; R2.4, R2.5 | Medium | Minimal | 9/21/2012 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | SERC2011006616 | CIP-005-1 | R1; R1.5 | Medium | Moderate | 6/28/2012 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | SERC2011006617 | CIP-005-1 | R1; R1.1 | Medium | Minimal | 5/31/2011 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$15,000 | SPP2013012176 | CIP-005-1 | R2; R2.4 | Medium | Minimal | 6/14/2013 | X |
| 12/30/2013 | NP14-14-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$10,000 | MRO2012009748 | CIP-005-1 | R1; R1.5 | Medium | Minimal | 8/26/2013 | X |
| 12/30/2013 | NP14-14-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$10,000 | MRO2012009749 | CIP-005-1 | R2; R2.2 | Medium | Minimal | 8/21/2013 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | SERC2013011825 | CIP-005-3 | R1; R1.5 | Medium | Minimal | 2/28/2013 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$70,000 | SERC2013012823 | CIP-005-3a | R1; R1.4 | Medium | Moderate | 4/12/2012 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | SERC2012010737 | CIP-005-3a | R1; R1.5 | Medium | Minimal | 6/30/2012 | X |
| 12/30/2013 | NP14-14-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$7,000 | WECC2012009123 | CIP-005-3a | R1 | Medium | Minimal | 5/31/2012 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$74,500 | SPP2011008252 | CIP-006-1 | R3 | Medium | Moderate | 4/6/2013 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$74,500 | SPP2011008253 | CIP-006-1 | R6; R6.1; R6.2; R6.3 | Medium | Moderate | 5/7/2013 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$70,000 | SERC201000442 | CIP-006-1 | R1 | Medium | Moderate | 12/21/2012 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|--|---|--|---------------------------------------|------------------------------------|
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2011009003 | CIP-006-1 | R3 | Medium | Moderate | 12/15/2012 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2011009004 | CIP-006-1 | R6 | Medium | Moderate | 8/31/2012 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SERC2011006613 | CIP-006-1 | R1; R1.8 | Medium | Moderate | 6/28/2012 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$15,000 | SPP2013012178 | CIP-006-1 | R1, R1.3; R1.4; R1.5; R1.8; R1.9 | Medium | Minimal | 11/22/2013 | X |
| 12/30/2013 | NP14-14-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | MRO2012009751 | CIP-006-1 | R1; R1.8 | Medium | Minimal | 8/21/2013 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$5,000 | SPP2012010286 | CIP-006-1 | R1; R1.8 | Medium | Moderate | 9/13/2012 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$74,500 | SPP2011008291 | CIP-006-1 R1 | R1; R1.4; R1.8 | Medium | Minimal | 8/30/2013 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2011009005 | CIP-006-2 | R3 | Medium | Moderate | 9/17/2013 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SERC2011006608 | CIP-006-2 | R3 | Medium | Minimal | 3/9/2011 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SERC2013011815 | CIP-006-3c | R2; R2.2 | Medium | Minimal | 2/28/2013 | X |
| 12/30/2013 | NP14-14-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$7,000 | WECC2012009124 | CIP-006-3c | R1 | Medium | Minimal | 2/15/2012 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$74,500 | SPP201100642 | CIP-007-1 | R1; R1.1; R1.2 | Medium | Moderate | 7/19/2013 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$74,500 | SPP201100643 | CIP-007-1 | R3; R3.1; R3.2 | Lower | Moderate | 7/1/2013 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$74,500 | SPP2011008254 | CIP-007-1 | R5; R5.1; R5.1.1; R5.1.2; R5.1.3; R5.2; R5.2.2; R5.2.3; R5.3.2; R5.3.3 | Medium | Moderate | 11/13/2013 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$74,500 | SPP2011008255 | CIP-007-1 | R6 | Medium | Moderate | 2/13/2014 (approved completion date) | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2011006645 | CIP-007-1 | R2; R2.1; R2.2 | Medium | Minimal | 12/28/2012 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2011006646 | CIP-007-1 | R8; R8.3 | Medium | Minimal | 4/12/2012 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2011009006 | CIP-007-1 | R1; R1.3 | Medium | Moderate | 4/3/2012 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2011009007 | CIP-007-1 | R4; R4.2 | Medium | Moderate | 8/15/2012 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2011009008 | CIP-007-1 | R5; R5.2.1 | Lower | Moderate | 9/17/2013 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SERC2011006610 | CIP-007-1 | R5; R5.2 | Lower | Moderate | 12/31/2013 (approved completion date) | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SERC2011006612 | CIP-007-1 | R3 | Lower | Moderate | 12/31/2013 (approved completion date) | X |
| 12/30/2013 | NP14-14-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | MRO2012009752 | CIP-007-1 | R4; R4.2 | Medium | Minimal | 8/23/2013 | X |
| 12/30/2013 | NP14-14-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | MRO2012009753 | CIP-007-1 | R8; R8.4 | Medium | Minimal | 8/21/2013 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2011008318 | CIP-007-3a | R5; R5.1 | Medium | Minimal | 9/28/2012 | X |
| 12/30/2013 | NP14-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2011009009 | CIP-007-3a | R3; R3.1 | Lower | Minimal | 1/10/2013 | X |
| 12/30/2013 | NP14-14-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$35,000 | WECC2013012043 | CIP-007-3a | R6 | Lower | Moderate | 9/11/2013 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$15,000 | SPP2013012181 | CIP-007-3a | R2; R2.1; R2.2 | Medium | Minimal | 6/14/2013 | X |
| 12/30/2013 | NP14-14-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$15,000 | SPP2013012182 | CIP-007-3a | R3; R3.2 | Lower | Moderate | 6/14/2013 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC200900414 | CIP-002-1 | R3 | High | Moderate | 6/30/2009 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC200900415 | CIP-003-1 | R1; 1.2 | Lower | Minimal | 10/22/2008 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC201000665 | CIP-003-1 | R4 | Medium | Moderate | 1/7/2011 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC201000666 | CIP-003-1 | R5 | Lower | Moderate | 2/22/2011 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC201000667 | CIP-003-1 | R6 | Lower | Moderate | 8/18/2010 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC2012010852 | CIP-003-3 | R6 | Lower | Minimal | 11/11/2012 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC201000507 | CIP-004-1 | R1 | Lower | Minimal | 3/4/2010 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC200900416 | CIP-004-1 | R2; R2.1 | Medium | Minimal | 8/25/2009 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC200900417 | CIP-004-1 | R3 | Medium | Minimal | 11/24/2009 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC200900419 | CIP-004-1 | R4 | Lower | Minimal | 3/31/2011 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC201000668 | CIP-004-1 | R4 | Lower | Minimal | 6/30/2011 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC2011007656 | CIP-004-3 | R3; R3.2 | Lower | Minimal | 7/5/2011 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC201000669 | CIP-005-1 | R1; R1.1; R1.4 | Medium | Minimal | 4/13/2011 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC201000670 | CIP-005-1 | R1; R1.5 | Medium | Moderate | 7/21/2011 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC2012010853 | CIP-005-1 | R1; R1.5 | Medium | Moderate | 11/15/2012 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC201000671 | CIP-005-1 | R2; R2.2 | Medium | Moderate | 8/12/2011 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC200900418 | CIP-005-1 | R2; R2.5.2 | Lower | Moderate | 1/29/2010 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC201000672 | CIP-005-1 | R3 | Medium | Minimal | 8/12/2011 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC2012010857 | CIP-005-1 | R3; R3.2 | Medium | Minimal | 11/1/2012 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC201000673 | CIP-005-1 | R5; R5.1 | Lower | Moderate | 7/5/2011 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC2012010854 | CIP-005-3a | R2; R2.2 | Medium | Moderate | 3/1/2013 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|------------------|---|--|--------------------------------------|------------------------------------|
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC2012010637 | CIP-006-1 | R1; R1.8 | Lower | Moderate | 8/27/2012 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC2012010855 | CIP-006-1 | R1; R1.8 | Lower | Moderate | 11/15/2012 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC2013012192 | CIP-006-3c | R1; R1.6 | Medium | Minimal | 5/31/2013 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC2012009690 | CIP-006-3c | R8; R8.1 | Medium | Minimal | 1/30/2012 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC2012010856 | CIP-007-1 | R1; R1.3 | Lower | Moderate | 11/15/2012 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC201000674 | CIP-007-1 | R2 | Medium | Serious | 5/21/2012 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC201000675 | CIP-007-1 | R3 | Lower | Serious | 11/14/2011 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC201000676 | CIP-007-1 | R5 | Lower | Moderate | 8/3/2011 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC2012010859 | CIP-007-1 | R5; R5.2.3; R5.3 | Lower | Moderate | 11/1/2012 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC2012010858 | CIP-007-1 | R6; R6.3 | Medium | Minimal | 11/1/2012 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC2011007657 | CIP-007-3a | R5; R5.3.3 | Medium | Moderate | 7/5/2011 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC200900420 | CIP-008-1 | R1 | Lower | Minimal | 6/30/2009 | X |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | SERC201000677 | CIP-009-1 | R1 | Medium | Moderate | 3/30/2011 | X |
| 12/30/2013 | NP14-17-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$144,000 | WECC2013012051 | CIP-002-1 | R3 | High | Moderate | 12/11/2013 | X |
| 12/30/2013 | NP14-17-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$144,000 | WECC2013012052 | CIP-005-3a | R2.4 | Medium | Minimal | 1/10/2014 (approved completion date) | X |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$110,000 | SERC2011007531 | CIP-004-3 | R2 | Lower | Minimal | 10/25/2011 | X |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$110,000 | SERC2012011584 | CIP-004-3 | R4 | Lower | Minimal | 1/1/2013 | X |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$110,000 | SERC2011008775 | CIP-005-1 | R1 | Medium | Moderate | 7/31/2014 (approved completion date) | X |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$110,000 | SERC2011007385 | CIP-005-2 | R3 | Medium | Moderate | 4/9/2013 | X |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$110,000 | SERC2012010549 | CIP-005-3a | R2 | Medium | Moderate | 6/8/2012 | X |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$110,000 | SERC2012011380 | CIP-005-3a | R5 | Lower | Minimal | 2/25/2013 | X |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$110,000 | SERC2012010143 | CIP-006-1 | R1 | Lower | Moderate | 7/30/2014 (approved completion date) | X |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$110,000 | SERC2012010343 | CIP-006-1 | R3 | Medium | Moderate | 2/20/2014 (approved completion date) | X |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$110,000 | SERC2011007156 | CIP-006-3a | R1 | Medium | Minimal | 9/9/2011 | X |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$110,000 | SERC2011008616 | CIP-006-3a | R6 | Lower | Minimal | 2/14/2012 | X |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$110,000 | SERC2012010344 | CIP-007-1 | R2 | Medium | Minimal | 5/14/2014 (approved completion date) | X |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$110,000 | SERC2011007532 | CIP-007-1 | R5 | Lower | Moderate | 4/14/2014 (approved completion date) | X |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$110,000 | SERC2012010793 | CIP-007-3 | R3 | Lower | Moderate | 1/25/2013 | X |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$110,000 | SERC2013011678 | CIP-007-3 | R6 | Medium | Moderate | 1/14/2013 | X |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$110,000 | SERC2012010346 | CIP-009-1 | R5 | Lower | Minimal | 6/20/2012 | X |
| 12/30/2013 | NP14-19-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$185,000 | WECC2012009779 | CIP-002-1 | R3 | High | Moderate | 7/12/2012 | X |
| 12/30/2013 | NP14-19-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$185,000 | WECC2011008709 | CIP-004-3 | R4; R4.2 | Lower | Minimal | 4/15/2012 | X |
| 12/30/2013 | NP14-19-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$185,000 | WECC2012009759 | CIP-005-1 | R1 | Medium | Minimal | 8/30/2012 | X |
| 12/30/2013 | NP14-19-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$185,000 | WECC2012009746 | CIP-006-1 | R1; R1.8 | Medium | Minimal | 4/1/2014 (approved completion date) | X |
| 12/30/2013 | NP14-19-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$185,000 | WECC2012009792 | CIP-007-1 | R1 | Medium | Moderate | 7/31/2012 | X |
| 12/30/2013 | NP14-19-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$185,000 | WECC2012009793 | CIP-007-1 | R2 | Medium | Moderate | 8/20/2012 | X |
| 12/30/2013 | NP14-19-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$185,000 | WECC2012009794 | CIP-007-1 | R3 | Lower | Minimal | 8/15/2012 | X |
| 12/30/2013 | NP14-19-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$185,000 | WECC2012009795 | CIP-007-1 | R4 | Medium | Minimal | 7/31/2012 | X |
| 12/30/2013 | NP14-19-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$185,000 | WECC2012009796 | CIP-007-1 | R5; R5.2.3 | Medium | Minimal | 10/15/2012 | X |
| 12/30/2013 | NP14-19-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$185,000 | WECC2012009797 | CIP-007-1 | R8; R8.4 | Medium | Moderate | 8/30/2012 | X |
| 12/30/2013 | NP14-19-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$185,000 | WECC2012009798 | CIP-007-1 | R9 | Lower | Minimal | 7/19/2013 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011006592 | CIP-002-1 | R3 | High | Moderate | 9/14/2012 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011008277 | CIP-003-1 | R4 | Medium | Moderate | 12/19/2012 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011008278 | CIP-003-1 | R5 | Lower | Minimal | 12/19/2012 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC201000523 | CIP-004-1 | R4 | Lower | Minimal | 9/12/2012 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011006594 | CIP-005-1 | R1 | Medium | Serious | 8/30/2013 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011007430 | CIP-005-1 | R2 | Medium | Serious | 8/30/2013 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011008279 | CIP-005-1 | R4 | Medium | Moderate | 8/30/2013 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2012010943 | CIP-005-3a | R3 | Medium | Moderate | 1/9/2013 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011006597 | CIP-006-1 | R1 | Medium | Moderate | 1/14/2013 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2012010945 | CIP-006-1 | R2 | Medium | Serious | 1/14/2013 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2012010946 | CIP-006-1 | R3 | Medium | Minimal | 10/5/2012 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011006595 | CIP-007-1 | R1 | Medium | Moderate | 1/14/2013 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011006596 | CIP-007-1 | R2 | Medium | Moderate | 1/14/2013 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011006598 | CIP-007-1 | R3 | Lower | Serious | 1/14/2013 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011006599 | CIP-007-1 | R4 | Medium | Minimal | 1/14/2013 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011006600 | CIP-007-1 | R5 | Lower | Serious | 1/14/2013 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011006601 | CIP-007-1 | R6 | Lower | Minimal | 1/14/2013 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011006602 | CIP-007-1 | R7 | Lower | Moderate | 1/14/2013 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011006603 | CIP-007-1 | R8 | Lower | Serious | 1/14/2013 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2012010949 | CIP-008-3 | R1; R1.4 | Lower | Minimal | 11/29/2012 | X |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$198,000 | SERC2011008283 | CIP-009-1 | R1 | Medium | Minimal | 12/6/2012 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------------------------|---|--|--------------------------------------|------------------------------------|
| 12/30/2013 | NP14-22-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC201102906 | CIP-003-1 | R4 | Medium | Minimal | 12/9/2011 | X |
| 12/30/2013 | NP14-22-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC201002325 | CIP-006-1 | R1 | Medium | Moderate | 10/26/2010 | X |
| 12/30/2013 | NP14-22-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC201102498 | CIP-006-1 | R1; R1.1; R1.2; R1.4; R1.6; R1.8 | Medium | Moderate | 2/1/2012 | X |
| 12/30/2013 | NP14-22-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC201102806 | CIP-006-1 | R3.1 | Medium | Minimal | 9/23/2011 | X |
| 12/30/2013 | NP14-22-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC201103022 | CIP-006-3c | R1; R1.4; R1.5 | Medium | Minimal | 12/9/2011 | X |
| 12/30/2013 | NP14-22-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC201002328 | CIP-007-1 | R5; R5.2.1; R5.3.2 | Medium | Minimal | 7/19/2010 | X |
| 12/30/2013 | NP14-22-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC201002358 | CIP-007-2a | R1 | Medium | Minimal | 9/8/2010 | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC201000513 | CIP-002-1 | R3 | High | Moderate | 9/30/2012 | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC201000564 | CIP-004-1 | R4 | Lower | Minimal | 9/8/2010 | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC2013013123 | CIP-004-1 | R2; R2.1 | Medium | Minimal | 3/31/2011 | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC2013013146 | CIP-004-1 | R3 | Medium | Minimal | 3/31/2011 | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC201000593 | CIP-005-1 | R2 | Medium | Moderate | 3/15/2014 (approved completion date) | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC2011008316 | CIP-005-1 | R1 | Medium | Moderate | 1/31/2013 | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC2011008511 | CIP-005-1 | R3 | Medium | Moderate | 4/11/2012 | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC2011008512 | CIP-005-1 | R4 | Medium | Moderate | 12/7/2012 | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC201000447 | CIP-006-1 | R2 | Medium | Moderate | 5/30/2010 | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC2011008513 | CIP-006-1 | R1; R1.8 | Medium | Moderate | 9/30/2013 | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC201000595 | CIP-006-2 | R5 | Medium | Minimal | 8/27/2010 | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC201000565 | CIP-007-1 | R5 | Medium | Moderate | 11/30/2011 | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC201000592 | CIP-007-1 | R2 | Medium | Moderate | 11/30/2011 | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC201000594 | CIP-007-1 | R6 | Lower | Moderate | 11/16/2012 | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC2011008516 | CIP-007-3a | R1 | Medium | Moderate | 5/29/2012 | X |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$175,000 | SERC2012011645 | CIP-007-3a | R3; R3.1 | Lower | Minimal | 5/17/2012 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008732 | CIP-002-1 | R3; R3.2 R3; R3.2 | Lower | Moderate | 3/16/2012 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008733 | CIP-003-1 | R5; R5.1 | Lower | Moderate | 10/18/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008734 | CIP-003-1 | R6 | Lower | Moderate | 3/6/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008735 | CIP-004-1 | R3; R3.1 | Medium | Minimal | 10/8/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008736 | CIP-004-1 | R4 | Lower | Moderate | 10/30/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008737 | CIP-005-1 | R2; R2.1; R2.2; R2.4 | Medium | Moderate | 10/18/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008738 | CIP-005-1 | R1 | Medium | Moderate | 11/6/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008739 | CIP-005-1 | R4; R4.1, R4.2, R4.3, R4.4, R4.5 | Medium | Moderate | 11/21/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008740 | CIP-005-1 | R5.1; R5.3 | Lower | Minimal | 10/11/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008747 | CIP-006-1 | R6 | Medium | Moderate | 10/18/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008742 | CIP-006-1 | R1.1; R1.2; R1.4; R1.6 | Medium | Minimal | 10/18/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008743 | CIP-006-1 | R1.8 | Medium | Moderate | 11/21/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008744 | CIP-006-1 | R2 | Medium | Minimal | 10/18/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008745 | CIP-006-1 | R3 | Medium | Minimal | 10/18/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008746 | CIP-006-1 | R4 | Medium | Moderate | 3/18/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008756 | CIP-007-1 | R8; R8.1, R8.2, R8.4 | Lower | Moderate | 11/21/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008749 | CIP-007-1 | R2; R2.1, R2.2 | Medium | Moderate | 10/30/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008751 | CIP-007-1 | R3 | Lower | Moderate | 10/18/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008754 | CIP-007-1 | R6; R6.5 | Lower | Moderate | 10/18/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008748 | CIP-007-1 | R1; R1.1 | Medium | Moderate | 10/18/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008752 | CIP-007-1 | R4 | Medium | Minimal | 10/30/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008753 | CIP-007-1 | R5 | Lower | Moderate | 10/30/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008755 | CIP-007-1 | R7 | Lower | Minimal | 10/25/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008757 | CIP-007-1 | R9 | Lower | Minimal | 11/8/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008759 | CIP-008-1 | R1.1; R1.3; R1.4; R1.5; R1.6 | Lower | Minimal | 10/31/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008761 | CIP-009-1 | R2 | Lower | Minimal | 10/18/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008760 | CIP-009-1 | R1 | Medium | Minimal | 1/31/2013 | X |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$100,000 | SPP2011008762 | CIP-009-1 | R4 | Lower | Minimal | 10/18/2013 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$350,000 | SERC200900394 | CIP-002-1 | R3 | High | Moderate | 6/27/2012 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$350,000 | SERC201000609 | CIP-002-1 | R3 | High | Moderate | 3/31/2012 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$350,000 | SERC2012011117 | CIP-002-3 | R3 | High | Moderate | 10/5/2012 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$350,000 | SERC2012011161 | CIP-002-3 | R3 | High | Moderate | 10/10/2012 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------|---|--|--------------------------------------|------------------------------------|
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC200900399 | CIP-004-1 | R4 | Lower | Minimal | 6/1/2010 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC201000576 | CIP-004-1 | R3 | Lower | Minimal | 6/20/2013 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2013012712 | CIP-004-1 | R3 | Medium | Minimal | 10/15/2013 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2012010717 | CIP-004-3 | R2; R2.3 | Lower | Minimal | 1/1/2013 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2012010718 | CIP-004-3 | R4 | Lower | Minimal | 1/1/2012 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2013012431 | CIP-004-3a | R4; R4.1 | Lower | Minimal | 7/31/2013 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC201000611 | CIP-005-1 | R2; R2.2 | Medium | Serious | 3/31/2014 (approved completion date) | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC201000613 | CIP-005-1 | R5; R5.2 | Lower | Moderate | 3/31/2012 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2012011434 | CIP-005-1 | R1; R1.1 | Medium | Minimal | 1/22/2014 (approved completion date) | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC201000612 | CIP-005-1 | R4; R4.5 | Medium | Moderate | 8/12/2010 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC201000614 | CIP-006-1 | R1; R1.8 | Lower | Minimal | 11/30/2011 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC201000615 | CIP-006-1 | R6 | Medium | Minimal | 10/28/2011 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2012011008 | CIP-006-1 | R1; R1.1 | Medium | Moderate | 5/2/2013 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2012011433 | CIP-006-1 | R3 | Medium | Minimal | 2/1/2014 (approved completion date) | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2012010954 | CIP-006-2 | R2; R2.1 | Medium | Moderate | 2/16/2011 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2012010953 | CIP-006-3c | R5 | Medium | Moderate | 7/11/2012 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2012010998 | CIP-006-3c | R4 | Medium | Minimal | 10/1/2012 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2012011007 | CIP-006-3c | R4 | Medium | Minimal | 8/8/2012 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2013011699 | CIP-006-3c | R1; R1.6 | Medium | Minimal | 1/22/2013 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2013011706 | CIP-006-3c | R1; R1.6 | Medium | Minimal | 3/27/2013 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2013012206 | CIP-006-3c | R4 | Medium | Minimal | 5/29/2013 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2013012710 | CIP-006-3c | R1; R1.6 | Medium | Moderate | 8/12/2013 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC200900599 | CIP-007-1 | R7 | Lower | Moderate | 8/31/2010 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC201000573 | CIP-007-1 | R1 | Medium | Moderate | 12/6/2011 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC201000575 | CIP-007-1 | R3 | Lower | Moderate | 12/30/2011 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC201000616 | CIP-007-1 | R1 | Medium | Moderate | 11/1/2011 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC201000617 | CIP-007-1 | R2 | Medium | Moderate | 7/25/2013 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC201000618 | CIP-007-1 | R5; R5.3.3 | Medium | Moderate | 8/3/2011 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC201000620 | CIP-007-1 | R8; R8.4 | Medium | Moderate | 8/12/2010 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2012011435 | CIP-007-1 | R4; R4.2 | Medium | Minimal | 5/29/2013 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC2012011437 | CIP-007-1 | R7; R7.3 | Lower | Minimal | 3/30/2013 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC201000619 | CIP-007-1 | R6; R6.4 | Lower | Moderate | 6/20/2012 | X |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$350,000 | SERC200900402 | CIP-009-1 | R1 | Medium | Moderate | 9/7/2012 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC2011007982 | CIP-002-1 | R1 | Lower | Serious | 4/30/2012 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC2011007983 | CIP-002-1 | R2 | High | Moderate | 4/30/2012 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC201000505 | CIP-004-1 | R4 | Lower | Minimal | 12/15/2012 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC201000622 | CIP-005-1 | R3 | Medium | Moderate | 10/16/2012 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC2013012272 | CIP-005-1 | R2 | Medium | Moderate | 2/12/2013 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC2012010981 | CIP-005-3a | R5 | Lower | Minimal | 9/18/2012 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC2012011336 | CIP-005-3a | R1 | Medium | Moderate | 2/28/2013 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC2011008003 | CIP-006-1 | R1 | Medium | Minimal | 1/31/2013 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC2013012006 | CIP-006-1 | R1; R1.1 | Medium | Minimal | 7/10/2013 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC2011007999 | CIP-006-3c | R6 | Lower | Minimal | 3/26/2013 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC2012011337 | CIP-006-3c | R5 | Medium | Minimal | 1/14/2013 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC2013011700 | CIP-006-3c | R5 | Medium | Moderate | 6/12/2013 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC201000621 | CIP-007-1 | R6 | Lower | Minimal | 3/28/2013 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC201000623 | CIP-007-1 | R1 | Medium | Moderate | 1/10/2013 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC2011007873 | CIP-007-1 | R2 | Medium | Moderate | 1/10/2013 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC2012009999 | CIP-007-1 | R5 | Lower | Moderate | 3/12/2012 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC2011008271 | CIP-007-3 | R7 | Lower | Minimal | 1/29/2013 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC2012010000 | CIP-007-3a | R4 | Medium | Minimal | 3/12/2013 | X |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | SERC2013012005 | CIP-007-3a | R7 | Lower | Minimal | 11/9/2013 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC200900284 | CIP-004-1 | R4 | Lower | Minimal | 5/27/2010 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC201000551 | CIP-004-1 | R2; R2.1 | Medium | Minimal | 6/4/2009 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC201000552 | CIP-004-1 | R4; R4.1 | Lower | Minimal | 7/18/2011 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC201100776 | CIP-004-3 | R4; R4.2 | Lower | Minimal | 5/6/2011 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2011007985 | CIP-004-3 | R4 | Lower | Moderate | 5/30/2012 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2012011169 | CIP-004-3 | R2; R2.1 | Medium | Minimal | 11/5/2012 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2011007429 | CIP-005-1 | R1; R1.4 | Medium | Minimal | 1/18/2013 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2011007986 | CIP-005-1 | R1; R1.1; R1.5 | Medium | Moderate | 6/28/2013 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2011007987 | CIP-005-1 | R2; R2.2 | Medium | Moderate | 4/18/2012 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2011007988 | CIP-005-1 | R4; R4.2 | Medium | Serious | 12/19/2011 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2011007989 | CIP-006-1 | R1; R1.7; R1.8 | Medium | Moderate | 3/31/2014 (approved completion date) | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2012010331 | CIP-006-3c | R2; R2.2 | Medium | Minimal | 7/30/2012 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------------------------|---|--|---------------------------------------|------------------------------------|
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012004 | CIP-006-3c | R1; R1.6 | Medium | Minimal | 4/23/2013 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC201000586 | CIP-007-1 | R5; R5.2.1 | Medium | Minimal | 7/22/2011 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2011007639 | CIP-007-1 | R5; R5.2 | Lower | Moderate | 1/25/2012 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2011007990 | CIP-007-1 | R2; R2.2 | Medium | Minimal | 12/16/2011 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2011007992 | CIP-007-1 | R8; R8.3 | Medium | Minimal | 12/29/2011 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2011007993 | CIP-007-1 | R1 | Medium | Minimal | 12/29/2011 | X |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012236 | CIP-007-1 | R3 | Lower | Serious | 12/30/2013 (approved completion date) | X |
| 1/30/2014 | NP14-27-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$48,000 | SERC2012011216 | CIP-004-1 | R4; R4.1 | Lower | Moderate | 2/28/2013 | X |
| 1/30/2014 | NP14-27-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$48,000 | SERC2012011218 | CIP-004-3 | R4; R4.2 | Medium | Minimal | 2/28/2013 | X |
| 1/30/2014 | NP14-27-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | WECC2013012656 | CIP-004-3a | R2; R2.1 | Medium | Moderate | 7/19/2013 | X |
| 1/30/2014 | NP14-27-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$12,000 | WECC2013012657 | CIP-004-3a | R3 | Medium | Minimal | 7/19/2013 | X |
| 1/30/2014 | NP14-27-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$48,000 | SERC2012011220 | CIP-005-1 | R4 | Medium | Moderate | 1/31/2013 | X |
| 1/30/2014 | NP14-27-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$48,000 | SERC2012011585 | CIP-005-1 | R1; R1.5 | Medium | Minimal | 3/28/2013 | X |
| 1/30/2014 | NP14-27-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | WECC2013013114 | CIP-005-1 | R1; R1.5 | Medium | Moderate | 12/4/2013 | X |
| 1/30/2014 | NP14-27-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$0 | TRE2012011016 | CIP-005-1 | R1; R1.5 | Medium | Moderate | 7/1/2013 | X |
| 1/30/2014 | NP14-27-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$0 | TRE2012011382 | CIP-005-1 | R4; R4.2; R4.3; R4.4; R4.5 | Medium | Moderate | 7/31/2013 | X |
| 1/30/2014 | NP14-27-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$48,000 | SERC2012011217 | CIP-006-1 | R1; R1.4; R1.7 | Medium | Minimal | 9/27/2012 | X |
| 1/30/2014 | NP14-27-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$48,000 | SERC2012011224 | CIP-006-1 | R6 | Medium | Minimal | 10/31/2012 | X |
| 1/30/2014 | NP14-27-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$48,000 | SERC2012011226 | CIP-006-1 | R1.8 | Medium | Minimal | 10/31/2012 | X |
| 1/30/2014 | NP14-27-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$0 | TRE2012011015 | CIP-006-1 | R1; R1.8 | Medium | Moderate | 6/20/2013 | X |
| 1/30/2014 | NP14-27-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$48,000 | SERC2012011219 | CIP-006-3c | R4 | Medium | Moderate | 10/4/2012 | X |
| 1/30/2014 | NP14-27-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$48,000 | SERC2012011440 | CIP-006-3c | R6 | Lower | Minimal | 12/31/2012 | X |
| 1/30/2014 | NP14-27-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$48,000 | SERC2012011221 | CIP-007-1 | R6; R6.1; R6.2; R6.3; R6.4; R6.5 | Medium | Minimal | 3/28/2013 | X |
| 1/30/2014 | NP14-27-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$48,000 | SERC2012011222 | CIP-007-1 | R5 | Medium | Minimal | 3/28/2013 | X |
| 1/30/2014 | NP14-27-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$48,000 | SERC2012011225 | CIP-007-1 | R8 | Medium | Minimal | 1/31/2013 | X |
| 1/30/2014 | NP14-27-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$0 | TRE2012011387 | CIP-007-1 | R1; R1.1; R1.2 | Medium | Moderate | 11/15/2013 | X |
| 1/30/2014 | NP14-27-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$14,000 | NPCC2012010252 | CIP-007-3a | R4; R4.1; R4.2 | Medium | Moderate | 5/4/2012 | X |
| 1/30/2014 | NP14-27-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$14,000 | NPCC2012010253 | CIP-007-3a | R4; R4.1 | Medium | Minimal | 4/27/2012 | X |
| 1/30/2014 | NP14-27-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$48,000 | SERC2012011223 | CIP-008-1 | R1; R1.1; R1.2 | Lower | Minimal | 2/15/2013 | X |
| 1/30/2014 | NP14-29-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$109,000 | WECC201102978 | CIP-006-1 | R1 | Medium | Minimal | 10/6/2011 | X |
| 1/30/2014 | NP14-29-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$109,000 | WECC2012010727 | CIP-006-3a | R5 | Medium | Moderate | 7/13/2012 | X |
| 1/30/2014 | NP14-29-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$109,000 | WECC2012010728 | CIP-007-1 | R2 | Medium | Minimal | 7/10/2013 | X |
| 1/30/2014 | NP14-29-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$109,000 | WECC2012010729 | CIP-007-1 | R3 | Lower | Moderate | 7/31/2013 | X |
| 1/30/2014 | NP14-29-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$109,000 | WECC2012010730 | CIP-007-1 | R6 | Medium | Minimal | 11/1/2013 | X |
| 1/30/2014 | NP14-30-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | RFC2013011941 | CIP-005-1 | R2; R2.2 | Medium | Moderate | 1/6/2014 | X |
| 1/30/2014 | NP14-30-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | RFC2012011452 | CIP-005-3 | R4 | Medium | Moderate | 3/28/2013 | X |
| 1/30/2014 | NP14-30-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | RFC2013012708 | CIP-005-3a | R3; R3.2 | Medium | Moderate | 8/1/2015 (approved completion date) | X |
| 1/30/2014 | NP14-30-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | RFC2012011568 | CIP-006-1 | R1 | Medium | Minimal | 6/26/2013 | X |
| 1/30/2014 | NP14-30-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | RFC2012011569 | CIP-006-1 | R2; R2.2 | Medium | Moderate | 6/28/2013 | X |
| 1/30/2014 | NP14-30-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | RFC2013012114 | CIP-007-1 | R1; R1.1 | Medium | Moderate | 1/6/2014 | X |
| 1/30/2014 | NP14-30-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | RFC2013011942 | CIP-007-1 | R2 | Medium | Moderate | 4/30/2014 (approved completion date) | X |
| 1/30/2014 | NP14-30-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | RFC2013011943 | CIP-007-1 | R3 | Lower | Moderate | 1/22/2014 | X |
| 1/30/2014 | NP14-30-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | RFC2013011945 | CIP-007-1 | R4; R4.2 | Medium | Moderate | 12/26/2013 | X |
| 1/30/2014 | NP14-30-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | RFC2012011453 | CIP-007-1 | R5; R5.2 | Lower | Moderate | 3/1/2014 (approved completion date) | X |
| 1/30/2014 | NP14-30-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | RFC2012011454 | CIP-007-1 | R6; R6.3; R6.4; R6.5 | Medium | Moderate | 5/23/2013 | X |
| 1/30/2014 | NP14-30-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | RFC2013013118 | CIP-007-1 | R6; R6.3; R6.4; R6.5 | Medium | Moderate | 8/1/2015 (approved completion date) | X |
| 1/30/2014 | NP14-30-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | RFC2012011455 | CIP-007-3 | R8 | Lower | Moderate | 3/28/2013 | X |
| 2/27/2014 | NP14-32-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$0 | SPP201000414 | CIP-002-1 | R2 | High | Moderate | 12/31/2012 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|------------------------------|---|--|--------------------------------------|------------------------------------|
| 2/27/2014 | NP14-34-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$86,000 | NPCC2013012747 | CIP-003-3 | R6 | Lower | Minimal | 12/31/2013 | X |
| 2/27/2014 | NP14-34-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$86,000 | NPCC2012009525 | CIP-004-3 | R4; R4.2 | Lower | Moderate | 2/10/2012 | X |
| 2/27/2014 | NP14-34-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$86,000 | NPCC2012010254 | CIP-004-3 | R3 | Medium | Moderate | 6/14/2012 | X |
| 2/27/2014 | NP14-34-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$86,000 | NPCC2012010426 | CIP-004-3 | R3 | Medium | Moderate | 6/14/2012 | X |
| 2/27/2014 | NP14-34-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$86,000 | NPCC2012011633 | CIP-004-3 | R3 | Medium | Moderate | 12/24/2012 | X |
| 2/27/2014 | NP14-34-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$86,000 | NPCC2013011743 | CIP-004-3 | R4; R4.2 | Lower | Moderate | 1/23/2013 | X |
| 2/27/2014 | NP14-34-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$15,000 | WECC2013012801 | CIP-004-3a | R4 | Lower | Minimal | 1/31/2014 | X |
| 2/27/2014 | NP14-34-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$86,000 | NPCC2012010255 | CIP-006-3c | R4 | Medium | Moderate | 5/24/2012 | X |
| 2/27/2014 | NP14-34-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$86,000 | NPCC2012010256 | CIP-006-3c | R1; R1.6.2 | Medium | Moderate | 5/24/2012 | X |
| 2/27/2014 | NP14-34-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$0 | TRE2012011160 | CIP-007-1 | R4; R4.1 | Medium | Minimal | 11/22/2011 | X |
| 2/27/2014 | NP14-34-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$86,000 | NPCC2012011629 | CIP-007-3a | R2; R2.2 | Medium | Minimal | 12/18/2013 | X |
| 3/31/2014 | NP14-35-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | WECC2012010274 | CIP-002-1 | R3; R3.2 | High | Minimal | 9/27/2012 | X |
| 3/31/2014 | NP14-35-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | WECC2012010364 | CIP-003-1 | R5; R5.1; R5.1.2; R5.2; R5.3 | Lower | Minimal | 9/21/2012 | X |
| 3/31/2014 | NP14-35-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | MRO2012010534 | CIP-004-1 | R3; R3.1; R3.3 | Medium | Minimal | 6/28/2013 | X |
| 3/31/2014 | NP14-35-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | MRO2012010536 | CIP-004-3 | R4; R4.1 | Lower | Moderate | 7/18/2013 | X |
| 3/31/2014 | NP14-35-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$8,000 | WECC2013012979 | CIP-004-3 | R2; R2.3 | Lower | Minimal | 9/23/2013 | X |
| 3/31/2014 | NP14-35-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | MRO2012010537 | CIP-005-1 | R1; R1.5 | Medium | Minimal | 12/19/2012 | X |
| 3/31/2014 | NP14-35-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | WECC2012010275 | CIP-005-3 | R4; R4.5 | Medium | Moderate | 3/19/2013 | X |
| 3/31/2014 | NP14-35-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | WECC2012010390 | CIP-006-1 | R1; R1.8 | Medium | Minimal | 1/4/2013 | X |
| 3/31/2014 | NP14-35-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | WECC2012011543 | CIP-006-1 | R1.1; R1.8 | Medium | Moderate | 8/13/2013 | X |
| 3/31/2014 | NP14-35-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | MRO2012010539 | CIP-006-1 | R1; R1.2; R1.8 | Medium | Moderate | 10/28/2013 | X |
| 3/31/2014 | NP14-35-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | MRO2012010541 | CIP-006-1 | R3 | Medium | Moderate | 6/12/2013 | X |
| 3/31/2014 | NP14-35-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | MRO2012010542 | CIP-007-1 | R2; R2.1 | Medium | Minimal | 8/14/2013 | X |
| 3/31/2014 | NP14-35-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | MRO2012010545 | CIP-007-1 | R5; R5.1.1; R5.3.2 | Lower | Minimal | 7/1/2013 | X |
| 3/31/2014 | NP14-35-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | WECC2012010308 | CIP-007-3a | R8; R8.2; R8.3; R8.4 | Medium | Moderate | 11/1/2012 | X |
| 3/31/2014 | NP14-35-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$40,000 | WECC2013012332 | CIP-007-3a | R7 | Lower | Moderate | 1/17/2014 | X |
| 3/31/2014 | NP14-37-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$465,000 | WECC2012011042 | CIP-002-2 | R3 | High | Moderate | 1/14/2014 | X |
| 3/31/2014 | NP14-37-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$465,000 | WECC2012011043 | CIP-005-3 | R1 | Medium | Moderate | 9/7/2014 (approved completion date) | X |
| 3/31/2014 | NP14-37-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$465,000 | WECC2012011044 | CIP-005-3 | R5 | Lower | Minimal | 11/15/2013 | X |
| 3/31/2014 | NP14-37-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$465,000 | WECC2012011140 | CIP-006-1 | R1 | Medium | Moderate | 3/18/2014 | X |
| 3/31/2014 | NP14-37-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$465,000 | WECC2012011053 | CIP-006-1 | R2 | Medium | Minimal | 11/29/2013 | X |
| 3/31/2014 | NP14-37-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$465,000 | WECC2012011054 | CIP-006-1 | R3 | Medium | Moderate | 1/24/2014 | X |
| 3/31/2014 | NP14-37-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$465,000 | WECC2012011058 | CIP-007-1 | R1 | Medium | Moderate | 10/1/2013 | X |
| 3/31/2014 | NP14-37-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$465,000 | WECC2012011059 | CIP-007-1 | R2 | Medium | Moderate | 6/13/2013 | X |
| 4/30/2014 | NP14-39-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$155,000 | WECC2012010739 | CIP-005-1 | R1; R1.1; R1.5; R1.6 | Medium | Moderate | 7/1/2014 (approved completion date) | X |
| 4/30/2014 | NP14-39-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$155,000 | WECC2012010740 | CIP-005-3 | R4 | Medium | Minimal | 12/1/2011 | X |
| 4/30/2014 | NP14-39-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$155,000 | WECC2012011029 | CIP-007-1 | R1 | Medium | Moderate | 12/1/2012 | X |
| 4/30/2014 | NP14-39-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$155,000 | WECC2012011031 | CIP-007-1 | R3 | Lower | Moderate | 8/6/2013 | X |
| 4/30/2014 | NP14-39-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$155,000 | WECC2012011034 | CIP-007-1 | R6 | Lower | Moderate | 2/1/2013 | X |
| 4/30/2014 | NP14-39-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$155,000 | WECC2012011329 | CIP-007-2a | R4 | Medium | Minimal | 10/29/2012 | X |
| 4/30/2014 | NP14-39-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$155,000 | WECC2012010439 | CIP-007-3a | R2 | Medium | Moderate | 9/30/2013 (approved completion date) | X |
| 4/30/2014 | NP14-39-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$155,000 | WECC2012011032 | CIP-007-3a | R5; R5.2.3; R5.3.3 | Medium | Moderate | 8/30/2013 | X |
| 4/30/2014 | NP14-39-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$155,000 | WECC2012010741 | CIP-007-3a | R8 | Medium | Minimal | 6/28/2012 | X |
| 4/30/2014 | NP14-40-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | TRE2013011837 | CIP-002-1 | R1; R1.1; R1.2 | Medium | Moderate | 1/27/2014 | X |
| 4/30/2014 | NP14-40-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | TRE2013011838 | CIP-002-1 | R2 | High | Moderate | 1/27/2014 | X |
| 4/30/2014 | NP14-40-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | TRE2013011839 | CIP-002-1 | R3 | High | Moderate | 1/27/2014 | X |
| 4/30/2014 | NP14-40-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | TRE2013012901 | CIP-002-3 | R1; R1.1; R1.2 | Medium | Moderate | 1/27/2014 | X |
| 4/30/2014 | NP14-40-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | TRE2013012902 | CIP-002-3 | R2 | High | Moderate | 1/27/2014 | X |
| 4/30/2014 | NP14-40-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | TRE2013012903 | CIP-002-3 | R3 | High | Moderate | 1/27/2014 | X |
| 4/30/2014 | NP14-40-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | FRCC2013012564 | CIP-003-3 | R6 | Lower | Moderate | 9/12/2014 (approved completion date) | X |
| 4/30/2014 | NP14-40-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | FRCC2013012546 | CIP-004-3 | R4; R4.1; R4.2 | Lower | Moderate | 11/13/2013 | X |
| 4/30/2014 | NP14-40-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$19,000 | SPP2013012345 | CIP-004-3 | R4; R4.1 | Lower | Minimal | 8/30/2013 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|------------------------------------|---|--|---------------------------------------|------------------------------------|
| 4/30/2014 | NP14-40-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SPP2012009925 | CIP-005-1 | R1; R1.4; R1.5; R1.6 | Medium | Moderate | TBD | X |
| 4/30/2014 | NP14-40-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SPP2012009926 | CIP-005-1 | R2; R2.1; R2.2; R2.4; R2.5.3 | Medium | Moderate | TBD | X |
| 4/30/2014 | NP14-40-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$19,000 | SPP2013012347 | CIP-005-3a | R4; R4.2; R4.5 | Medium | Moderate | 11/21/2013 | X |
| 4/30/2014 | NP14-40-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$0 | NPCC2012011038 | CIP-005-3a | R1; R1.5 | Medium | Moderate | 7/11/2013 | X |
| 4/30/2014 | NP14-40-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$19,000 | SPP2013012354 | CIP-006-1 | R1; R1.8 | Medium | Moderate | 7/26/2013 | X |
| 4/30/2014 | NP14-40-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$5,000 | MRO2013011781 | CIP-006-1 | R1; R1.8 | Medium | Minimal | 4/5/2013 | X |
| 4/30/2014 | NP14-40-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SPP2012009930 | CIP-006-1 | R1.8 | Medium | Moderate | TBD | X |
| 4/30/2014 | NP14-40-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$5,000 | MRO2013011715 | CIP-006-3a | R2 | Medium | Minimal | 4/5/2013 | X |
| 4/30/2014 | NP14-40-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$0 | NPCC2012011037 | CIP-006-3a | R2; R2.2 | Medium | Moderate | 6/20/2013 | X |
| 4/30/2014 | NP14-40-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$19,000 | SPP2013012348 | CIP-006-3c | R1; R1.6.1; R1.6.2 | Medium | Moderate | 8/12/2013 | X |
| 4/30/2014 | NP14-40-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$20,000 | FRCC2012010851 | CIP-007-3a | R6; R6.2; R6.4; R6.5 | Medium | Moderate | 8/31/2012 | X |
| 4/30/2014 | NP14-40-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$20,000 | FRCC2012011635 | CIP-007-3a | R4; R4.2 | Medium | Minimal | 9/9/2013 | X |
| 4/30/2014 | NP14-40-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$19,000 | SPP2013012349 | CIP-007-3a | R8; R8.2; R8.4 | Medium | Moderate | 11/21/2013 | X |
| 4/30/2014 | NP14-40-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$19,000 | SPP2013012351 | CIP-007-3a | R3; R3.1; R3.2 | Lower | Minimal | 8/2/2013 | X |
| 5/29/2014 | NP14-41-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$98,500 | WECC2013012597 | CIP-007-1 | R5; R5.1.2 | Lower | Moderate | 3/15/2013 | X |
| 5/29/2014 | NP14-41-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$98,500 | WECC2013012598 | CIP-007-1 | R6 | Medium | Moderate | 10/28/2014 (approved completion date) | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000685 | CIP-002-2 | R2 | High | Minimal | 12/1/2010 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000568 | CIP-004-1 | R3 | Medium | Minimal | 1/20/2011 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000569 | CIP-004-1 | R4 | Medium | Minimal | 3/13/2013 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC2012010884 | CIP-004-3 | R4 | Lower | Minimal | 2/28/2013 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000729 | CIP-005-1 | R1:1.5 | Medium | Moderate | 4/1/2016 (approved completion date) | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC2012011010 | CIP-005-1 | R1 | Medium | Minimal | 4/1/2016 (approved completion date) | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000730 | CIP-005-1 | R2:2.2 | Medium | Moderate | 9/9/2013 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC2012011011 | CIP-005-1 | R3:3.2 | Medium | Minimal | 9/9/2013 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000682 | CIP-006-1 | R1.1 | Medium | Minimal | 1/31/2014 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000731 | CIP-006-1 | R1 | Medium | Moderate | 3/9/2012 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC2012010586 | CIP-006-1 | R1 | Medium | Moderate | 12/31/2012 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC2012010860 | CIP-006-1 | R1:1.8 | Medium | Moderate | 10/31/2013 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC2012010585 | CIP-006-1 | R4 | Medium | Moderate | 8/10/2012 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000679 | CIP-006-2 | R3 | Medium | Minimal | 12/5/2010 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000733 | CIP-006-2 | R3 | Medium | Moderate | 3/30/2016 (approved completion date) | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000683 | CIP-006-3a | R4 | Medium | Moderate | 1/31/2012 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC2013012360 | CIP-006-3c | R1:1.6.1 | Medium | Minimal | 7/9/2013 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC2012009109 | CIP-006-3c | R6 | Lower | Minimal | 12/31/2011 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000678 | CIP-007-1 | R1 | Medium | Serious | 2/28/2014 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000734 | CIP-007-1 | R2 | Medium | Serious | 7/31/2012 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000735 | CIP-007-1 | R3 | Lower | Moderate | 6/30/2014 (approved completion date) | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000566 | CIP-007-1 | R4 | Medium | Minimal | 11/30/2010 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000736 | CIP-007-1 | R4:4.2 | Medium | Minimal | 6/30/2015 (approved completion date) | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000570 | CIP-007-1 | R5 | Medium | Moderate | 9/28/2012 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC201000567 | CIP-007-1 | R6 | Medium | Moderate | 10/18/2013 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC2012010883 | CIP-007-3a | R3 | Lower | Minimal | 6/13/2013 | X |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SERC2012011013 | CIP-007-3a | R8 | Lower | Minimal | 3/18/2014 | X |
| 5/29/2014 | NP14-43-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$12,000 | WECC2013013128 | CIP-006-3c | R1; R1.6.2 | Medium | Minimal | 10/10/2013 | X |
| 6/26/2014 | NP14-44-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | TRE2013012873 | CIP-003-1 | R5;R5.2; | Lower | Moderate | 5/13/2013 | X |
| 6/26/2014 | NP14-44-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$24,000 | WECC2013013238 | CIP-003-1 | R5 | Lower | Minimal | 3/17/2014 | X |
| 6/26/2014 | NP14-44-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | TRE2013012874 | CIP-004-1 | R4 | Lower | Minimal | 5/13/2013 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|----------------------------------|--|---|-------------------|----------------------|-------------------------|---|--|---------------------------------------|------------------------------------|
| 6/26/2014 | NP14-44-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | TRE2013013281 | CIP-004-3a | R2 | Lower | Minimal | 5/13/2013 | X |
| 6/26/2014 | NP14-44-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2013013176 | CIP-005-1 | R4;R4.2;R4.3; R4.4;R4.5 | Medium | Moderate | 3/21/2014 | X |
| 6/26/2014 | NP14-44-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$56,000 | FRCC2013013034 | CIP-005-3a | R4;R4.4 | Medium | Minimal | 3/26/2014 | X |
| 6/26/2014 | NP14-44-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | TRE2013013148 | CIP-005-3a | R3 | Medium | Moderate | 5/13/2013 | X |
| 6/26/2014 | NP14-44-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | TRE2013013098 | CIP-005-3a | R4;R4.3 | Medium | Minimal | 5/13/2013 | X |
| 6/26/2014 | NP14-44-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$0 | TRE2013011886 | CIP-006-3c | R1;R1.6 | Medium | Minimal | 8/12/2013 | X |
| 6/26/2014 | NP14-44-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$56,000 | FRCC2013012774 | CIP-007-1 | R5;R5.2;R5.2.1 | Medium | Minimal | 1/7/2014 | X |
| 6/26/2014 | NP14-44-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$56,000 | FRCC2013013036 | CIP-007-1 | R2;R2.2 | Medium | Moderate | 7/31/2014 (approved completion date) | X |
| 6/26/2014 | NP14-44-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$56,000 | FRCC2013013037 | CIP-007-1 | R3;R3.1;R3.2 | Lower | Moderate | 4/30/2014 | X |
| 6/26/2014 | NP14-44-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | TRE2013012875 | CIP-007-1 | R1;R1.1 | Medium | Moderate | 5/13/2013 | X |
| 6/26/2014 | NP14-44-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$40,000 | TRE2013013099 | CIP-007-1 | R8 | Medium | Moderate | 5/13/2013 | X |
| 6/26/2014 | NP14-44-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$56,000 | FRCC2013013038 | CIP-009-1 | R5 | Lower | Moderate | 10/17/2014 (approved completion date) | X |
| 7/31/2014 | NP14-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$180,000 | WECC2013012390 | CIP-004-1 | R3 | Medium | Moderate | 3/8/2013 | X |
| 7/31/2014 | NP14-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$180,000 | WECC2013012378 | CIP-005-1 | R1; R1.5 | Medium | Moderate | 12/19/2014 (approved completion date) | X |
| 7/31/2014 | NP14-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$180,000 | WECC2013012379 | CIP-005-1 | R2; R2.4; R2.5 | Medium | Moderate | 12/19/2014 (approved completion date) | X |
| 7/31/2014 | NP14-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$180,000 | WECC2013012437 | CIP-006-1 | R1; R1.8 | Medium | Minimal | 12/19/2014 (approved completion date) | X |
| 7/31/2014 | NP14-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$180,000 | WECC2013012381 | CIP-007-1 | R2 | Medium | Moderate | 10/7/2013 | X |
| 7/31/2014 | NP14-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$180,000 | WECC2013011811 | CIP-007-1 | R5; R5.2.3 | Medium | Minimal | 12/19/2014 (approved completion date) | X |
| 7/31/2014 | NP14-45-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$180,000 | WECC2013012380 | CIP-007-3a | R8 | Lower | Minimal | 12/20/2013 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011444 | CIP-003-2 | R6 | Lower | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011471 | CIP-004-1 | R2; R2.1; R2.3 | Lower | Minimal | 5/6/2011 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012010995 | CIP-004-1 | R2; R2.1; R2.3 | Lower | Minimal | 5/6/2011 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012010385 | CIP-004-3 | R4; R4.2 | Lower | Minimal | 6/4/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011443 | CIP-004-3 | R4; R4.2 | Lower | Minimal | 6/4/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011078 | CIP-005-1 | R5; R5.2 | Lower | Minimal | 2/26/2013 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011062 | CIP-005-1 | R5; R5.2 | Lower | Minimal | 7/30/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011068 | CIP-005-1 | R5; R5.2 | Lower | Minimal | 7/30/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011072 | CIP-005-1 | R5; R5.2 | Lower | Minimal | 7/30/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011061 | CIP-005-3 | R2; R2.1; R2.2 | Medium | Minimal | 8/15/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011067 | CIP-005-3 | R2; R2.1; R2.2 | Medium | Minimal | 8/15/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011123 | CIP-005-3 | R2; R2.1; R2.2 | Medium | Minimal | 8/15/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011071 | CIP-005-3 | R2; R2.1; R2.2 | Medium | Minimal | 8/15/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011272 | CIP-005-3a | R1; R1.5 | Medium | Moderate | 10/5/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011273 | CIP-005-3a | R3; R3.2 | Medium | Minimal | 4/1/2013 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011063 | CIP-007-1 | R1; R1.3 | Lower | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011069 | CIP-007-1 | R1; R1.3 | Lower | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011073 | CIP-007-1 | R1; R1.3 | Lower | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011099 | CIP-007-1 | R1; R1.3 | Lower | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011101 | CIP-007-1 | R5 | Lower | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011064 | CIP-007-1 | R5 | Lower | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011074 | CIP-007-1 | R5 | Lower | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011066 | CIP-007-1 | R5 | Lower | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012010386 | CIP-007-1 | R5; R5.3.3 | Lower | Minimal | 1/26/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011102 | CIP-007-1 | R6 | Lower | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011065 | CIP-007-1 | R6 | Lower | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011070 | CIP-007-1 | R6 | Lower | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011075 | CIP-007-1 | R6 | Lower | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012010387 | CIP-007-1 | R6 | Lower | Moderate | 1/26/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012010389 | CIP-007-3a | R1; R1.1 | Medium | Minimal | 3/6/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011077 | CIP-007-3a | R5; R5.3.3 | Medium | Minimal | 9/16/2013 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011076 | CIP-007-3a | R7; R7.3 | Lower | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011265 | CIP-009-1 | R1 | Medium | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011268 | CIP-009-1 | R1 | Medium | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-46-000 | RF | Unidentified Registered Entities | NCRXXXXX | \$50,000 | RFC2012011270 | CIP-009-1 | R1 | Medium | Minimal | 8/14/2012 | X |
| 7/31/2014 | NP14-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | TRE2013012930 | CIP-003-3 | R6 | Lower | Moderate | 4/11/2013 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|--|---|--|---------------------------------------|------------------------------------|
| 7/31/2014 | NP14-47-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2013011747 | CIP-005-1 | R2; R2.4 | Medium | Moderate | 6/9/2015 (approved completion date) | X |
| 7/31/2014 | NP14-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$20,000 | WECC2013012539 | CIP-005-2 | R1; R1.5 | Medium | Minimal | 10/15/2014 (approved completion date) | X |
| 7/31/2014 | NP14-47-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP2013013028 | CIP-005-3 | R1; R1.5 | Medium | Minimal | 1/15/2015 (approved completion date) | X |
| 7/31/2014 | NP14-47-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP2013013040 | CIP-005-3 | R3; R3.2 | Medium | Minimal | 10/22/2014 (approved completion date) | X |
| 7/31/2014 | NP14-47-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2013011720 | CIP-005-3 | R4 | Medium | Moderate | 12/31/2012 | X |
| 7/31/2014 | NP14-47-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP2013013042 | CIP-005-3a | R2; R2.2; R2.4 | Medium | Minimal | 10/22/2014 (approved completion date) | X |
| 7/31/2014 | NP14-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$20,000 | WECC2013012739 | CIP-005-3a | R2; R2.2 | Medium | Minimal | 9/5/2013 | X |
| 7/31/2014 | NP14-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$20,000 | WECC2013012740 | CIP-005-3a | R4; R4.2 | Medium | Minimal | 9/30/2013 | X |
| 7/31/2014 | NP14-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | TRE2014013578 | CIP-005-3a | R5; R5.2 | Lower | Minimal | 4/11/2013 | X |
| 7/31/2014 | NP14-47-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP2013013044 | CIP-006-1 | R1.8 | Medium | Minimal | 1/15/2015 (approved completion date) | X |
| 7/31/2014 | NP14-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$20,000 | WECC2013012255 | CIP-006-1 | R1; R1.8 | Medium | Minimal | 7/9/2013 | X |
| 7/31/2014 | NP14-47-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2013012418 | CIP-006-1 | R1; R1.8 | Medium | Moderate | 4/22/2014 | X |
| 7/31/2014 | NP14-47-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | WECC2013012020 | CIP-006-3c | R2; R2.2 | Medium | Moderate | 12/1/2014 (approved completion date) | X |
| 7/31/2014 | NP14-47-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SERC2013013041 | CIP-006-3c | R4 | Medium | Minimal | 11/15/2013 | X |
| 7/31/2014 | NP14-47-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | TRE2014013577 | CIP-006-3c | R1; R1.7 | Medium | Minimal | 4/11/2013 | X |
| 7/31/2014 | NP14-47-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2014013345 | CIP-006-3c | R1 | Medium | Minimal | 1/7/2014 | X |
| 7/31/2014 | NP14-47-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2013011724 | CIP-007-1 | R4 | Medium | Moderate | 1/31/2013 | X |
| 7/31/2014 | NP14-47-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP2013013045 | CIP-007-1 | R1; R1.1; R1.3 | Medium | Minimal | 11/15/2013 | X |
| 7/31/2014 | NP14-47-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP2013013048 | CIP-007-3 | R6 | Medium | Minimal | 4/25/2014 | X |
| 7/31/2014 | NP14-47-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP2013012526 | CIP-007-3 | R5; R5.1.2; R5.2.3; R5.3.1; R5.3.2; R5.3.3 | Lower | Minimal | 4/25/2014 | X |
| 7/31/2014 | NP14-47-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$68,000 | SPP2013012524 | CIP-007-3a | R3; R3.1 | Lower | Minimal | 10/22/2014 (approved completion date) | X |
| 7/31/2014 | NP14-47-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2013011718 | CIP-007-3a | R8 | Medium | Moderate | 12/31/2012 | X |
| 7/31/2014 | NP14-47-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2013011748 | CIP-007-3a | R1; R1.1 | Medium | Moderate | 5/8/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010910 | CIP-002-1 | R2 | High | Minimal | 4/30/2013 | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013552 | CIP-002-1 | R3 | High | Moderate | 10/24/2012 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010911 | CIP-002-1 | R3 | High | Moderate | 10/24/2012 | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013553 | CIP-002-1 | R4 | Lower | Minimal | 8/1/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010912 | CIP-002-1 | R4 | Lower | Minimal | 8/1/2013 | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013556 | CIP-003-1 | R1; R1.3 | Lower | Minimal | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2013011925 | CIP-003-1 | R1; R1.3 | Lower | Minimal | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2014013690 | CIP-003-1 | R1; R1.3 | Lower | Minimal | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2014013691 | CIP-003-1 | R1; R1.3 | Lower | Minimal | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010079 | CIP-003-1 | R4 | Medium | Moderate | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010086 | CIP-003-1 | R4 | Medium | Moderate | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010093 | CIP-003-1 | R4 | Medium | Moderate | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100889 | CIP-003-1 | R5 | Lower | Moderate | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100896 | CIP-003-1 | R5 | Lower | Moderate | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100903 | CIP-003-1 | R5 | Lower | Moderate | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013554 | CIP-003-1 | R6 | Lower | Moderate | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010302 | CIP-003-1 | R6 | Lower | Moderate | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2013011966 | CIP-003-1 | R6 | Lower | Moderate | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013550 | CIP-004-1 | R3 | Medium | Minimal | 3/5/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010303 | CIP-004-1 | R3 | Medium | Minimal | 3/5/2014 | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013549 | CIP-004-1 | R4 | Lower | Minimal | 3/5/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010080 | CIP-004-1 | R4 | Lower | Minimal | 10/9/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010087 | CIP-004-1 | R4 | Lower | Minimal | 3/5/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010094 | CIP-004-1 | R4 | Lower | Minimal | 11/11/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012011364 | CIP-004-3a | R3 | Medium | Minimal | 2/3/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2014013316 | CIP-004-3a | R3 | Medium | Minimal | 1/30/2014 | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013440 | CIP-005-1 | R1 | Medium | Moderate | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010305 | CIP-005-1 | R1 | Medium | Moderate | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010924 | CIP-005-1 | R1 | Medium | Moderate | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2013011967 | CIP-005-1 | R1 | Medium | Moderate | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013551 | CIP-005-1 | R2 | Medium | Moderate | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100890 | CIP-005-1 | R2 | Medium | Moderate | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100897 | CIP-005-1 | R2 | Medium | Moderate | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100904 | CIP-005-1 | R2 | Medium | Moderate | 12/1/2014 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------|---|--|--------------------------------------|------------------------------------|
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013548 | CIP-005-1 | R3 | Medium | Moderate | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100891 | CIP-005-1 | R3 | Medium | Moderate | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100898 | CIP-005-1 | R3 | Medium | Moderate | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100905 | CIP-005-1 | R3 | Medium | Moderate | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013541 | CIP-005-1 | R4 | Medium | Moderate | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010297 | CIP-005-1 | R4 | Medium | Moderate | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010311 | CIP-005-1 | R4 | Medium | Moderate | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010314 | CIP-005-1 | R4 | Medium | Moderate | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013534 | CIP-005-1 | R5 | Lower | Minimal | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010298 | CIP-005-1 | R5 | Lower | Minimal | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010310 | CIP-005-1 | R5 | Lower | Minimal | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010315 | CIP-005-1 | R5 | Lower | Minimal | 12/1/2014 | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013535 | CIP-006-2 | R2; R2.2 | Medium | Moderate | 12/15/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2014013703 | CIP-006-2 | R2; R2.2 | Medium | Moderate | 12/15/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2014013708 | CIP-006-2 | R2; R2.2 | Medium | Moderate | 12/15/2014 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2014013709 | CIP-006-2 | R2; R2.2 | Medium | Moderate | 12/15/2014 | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013536 | CIP-006-3c | R1 | Medium | Moderate | 12/31/2012 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100892 | CIP-006-3c | R1 | Medium | Moderate | 9/30/2012 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100899 | CIP-006-3c | R1 | Medium | Moderate | 12/31/2012 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100906 | CIP-006-3c | R1 | Medium | Moderate | 8/27/2012 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100893 | CIP-006-3c | R6 | Lower | Moderate | 9/30/2012 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100900 | CIP-006-3c | R6 | Lower | Moderate | 12/31/2012 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100907 | CIP-006-3c | R6 | Lower | Moderate | 8/27/2012 | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013546 | CIP-007-1 | R1 | Medium | Minimal | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100894 | CIP-007-1 | R1 | Medium | Minimal | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100901 | CIP-007-1 | R1 | Medium | Minimal | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100908 | CIP-007-1 | R1 | Medium | Minimal | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013545 | CIP-007-1 | R2 | Medium | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100895 | CIP-007-1 | R2 | Medium | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100902 | CIP-007-1 | R2 | Medium | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC201100909 | CIP-007-1 | R2 | Medium | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013544 | CIP-007-1 | R3 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010081 | CIP-007-1 | R3 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010088 | CIP-007-1 | R3 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010095 | CIP-007-1 | R3 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010082 | CIP-007-1 | R4 | Medium | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010089 | CIP-007-1 | R4 | Medium | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010096 | CIP-007-1 | R4 | Medium | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013537 | CIP-007-1 | R5 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010083 | CIP-007-1 | R5 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010090 | CIP-007-1 | R5 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010097 | CIP-007-1 | R5 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013543 | CIP-007-1 | R6 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010084 | CIP-007-1 | R6 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010091 | CIP-007-1 | R6 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010098 | CIP-007-1 | R6 | Lower | Moderate | 7/14/2014 (approved completion date) | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------------------------|---|--|---------------------------------------|------------------------------------|
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013542 | CIP-007-1 | R7 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010921 | CIP-007-1 | R7 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010925 | CIP-007-1 | R7 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2013011968 | CIP-007-1 | R7 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013540 | CIP-007-1 | R8 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010085 | CIP-007-1 | R8 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010092 | CIP-007-1 | R8 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010099 | CIP-007-1 | R8 | Lower | Moderate | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013539 | CIP-007-1 | R9 | Lower | Minimal | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010301 | CIP-007-1 | R9 | Lower | Minimal | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010313 | CIP-007-1 | R9 | Lower | Minimal | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010317 | CIP-007-1 | R9 | Lower | Minimal | 7/14/2014 (approved completion date) | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013538 | CIP-008-1 | R1 | Lower | Minimal | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010907 | CIP-008-1 | R1 | Lower | Minimal | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010926 | CIP-008-1 | R1 | Lower | Minimal | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2013011970 | CIP-008-1 | R1 | Lower | Minimal | 12/9/2013 | X |
| 8/27/2014 | NP14-48-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$625,000 | NPCC2014013547 | CIP-009-1 | R1 | Medium | Moderate | 11/11/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010908 | CIP-009-1 | R1 | Medium | Moderate | 11/11/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2012010927 | CIP-009-1 | R1 | Medium | Moderate | 12/16/2013 | X |
| 8/27/2014 | NP14-48-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$625,000 | RFC2013011971 | CIP-009-1 | R1 | Medium | Moderate | 12/16/2013 | X |
| 8/27/2014 | NP14-49-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$40,000 | MRO2012011292 | CIP-003-1 | R5; R5.2 | Lower | Minimal | 12/17/2013 | X |
| 8/27/2014 | NP14-49-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$40,000 | MRO2012011293 | CIP-003-3 | R6 | Lower | Moderate | 12/11/2013 | X |
| 8/27/2014 | NP14-49-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC2013011897 | CIP-005-1 | R5 | Lower | Minimal | 7/16/2013 | X |
| 8/27/2014 | NP14-49-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$40,000 | MRO2012011301 | CIP-005-1 | R1; R1.5; R1.6 | Medium | Moderate | 6/5/2014 | X |
| 8/27/2014 | NP14-49-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$40,000 | MRO2012011302 | CIP-005-1 | R4; R4.2; R4.3; R4.4 | Medium | Minimal | 9/27/2013 | X |
| 8/27/2014 | NP14-49-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC2012009818 | CIP-005-1 | R1 | Medium | Moderate | 10/10/2013 | X |
| 8/27/2014 | NP14-49-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC2012010700 | CIP-005-1 | R2 | Medium | Minimal | 10/26/2012 | X |
| 8/27/2014 | NP14-49-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$30,000 | MRO2012011035 | CIP-005-2 | R1; R1.5 | Medium | Moderate | 3/5/2013 | X |
| 8/27/2014 | NP14-49-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC2013011896 | CIP-005-3a | R4 | Medium | Minimal | 1/24/2013 | X |
| 8/27/2014 | NP14-49-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$40,000 | WECC2013012041 | CIP-005-3a | R3 | Medium | Moderate | 9/30/2013 | X |
| 8/27/2014 | NP14-49-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$40,000 | WECC2013012103 | CIP-005-3a | R5; R5.2 | Lower | Minimal | 9/27/2012 | X |
| 8/27/2014 | NP14-49-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$22,000 | WECC2013013248 | CIP-005-3a | R2; R2.4 | Medium | Moderate | 11/19/2014 (approved completion date) | X |
| 8/27/2014 | NP14-49-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SERC2014013389 | CIP-005-3a | R3; R3.2 | Medium | Moderate | 5/30/2014 | X |
| 8/27/2014 | NP14-49-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$40,000 | MRO2012011300 | CIP-006-1 | R1; R1.8 | Medium | Minimal | 9/19/2013 | X |
| 8/27/2014 | NP14-49-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$30,000 | MRO2012011040 | CIP-006-3a | R2 | Medium | Minimal | 7/30/2013 | X |
| 8/27/2014 | NP14-49-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$22,000 | WECC2013013153 | CIP-006-3c | R2 | Medium | Minimal | 5/7/2014 | X |
| 8/27/2014 | NP14-49-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$40,000 | MRO2012011295 | CIP-007-1 | R1; R1.1; R1.3 | Medium | Moderate | 1/15/2014 | X |
| 8/27/2014 | NP14-49-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$40,000 | MRO2012011296 | CIP-007-1 | R2 | Medium | Minimal | 10/7/2013 | X |
| 8/27/2014 | NP14-49-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$40,000 | MRO2012011297 | CIP-007-1 | R5; R5.1.2; R5.1.3; R5.2.3; R5.3 | Lower | Moderate | 9/19/2014 | X |
| 8/27/2014 | NP14-49-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$40,000 | MRO2012011299 | CIP-007-1 | R8; R8.3; R8.4 | Lower | Minimal | 9/27/2013 | X |
| 8/27/2014 | NP14-49-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC2012010880 | CIP-007-1 | R3 | Lower | Minimal | 10/16/2013 | X |
| 8/27/2014 | NP14-49-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$40,000 | MRO2012011298 | CIP-007-3a | R3; R3.2 | Lower | Minimal | 12/11/2013 | X |
| 8/27/2014 | NP14-49-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SERC2014013388 | CIP-007-3a | R5; R5.3.3 | Medium | Minimal | 4/16/2014 | X |
| 8/27/2014 | NP14-49-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SERC2014013390 | CIP-007-3a | R6 | Medium | Moderate | 5/30/2014 | X |
| 8/27/2014 | NP14-49-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SERC2014013391 | CIP-007-3a | R3 | Lower | Moderate | 6/30/2014 | X |
| 9/30/2014 | NP14-50-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$25,000 | WECC2013012311 | CIP-002-3 | R1 | Medium | Minimal | 9/5/2013 | X |
| 9/30/2014 | NP14-50-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$25,000 | WECC2012011326 | CIP-004-1 | R3 | Medium | Minimal | 10/19/2012 | X |
| 9/30/2014 | NP14-50-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$0 | WECC2013013150 | CIP-005-1 | R2; R2.2 | Medium | Moderate | 6/26/2014 | X |
| 9/30/2014 | NP14-50-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | SERC2013012782 | CIP-005-3 | R1; R1.4 | Medium | Minimal | 10/17/2013 | X |
| 9/30/2014 | NP14-50-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | SERC2013012783 | CIP-005-3 | R2; R2.2 | Medium | Moderate | 11/18/2013 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|------------------------|---|--|---------------------------------------|------------------------------------|
| 9/30/2014 | NP14-50-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC2013012977 | CIP-005-3a | R1; R1.6 | Lower | Minimal | 2/28/2014 | X |
| 9/30/2014 | NP14-50-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$5,000 | SERC2013012784 | CIP-006-3c | R1; R1.1 | Medium | Minimal | 7/24/2013 | X |
| 9/30/2014 | NP14-50-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC2014013393 | CIP-006-3c | R1; R1.1 | Medium | Minimal | 6/18/2014 | X |
| 9/30/2014 | NP14-50-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$28,000 | TRE2013012540 | CIP-007-1 | R5 | Medium | Moderate | 12/31/2014 (approved completion date) | X |
| 9/30/2014 | NP14-50-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$5,000 | SERC2014013637 | CIP-007-3a | R2; R2.2 | Medium | Minimal | 3/28/2014 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013012841 | CIP-003-1 | R6 | Lower | Minimal | 11/26/2013 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013012842 | CIP-004-1 | R4 | Lower | Minimal | 2/5/2013 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013012356 | CIP-004-3 | R4 | Lower | Minimal | 1/9/2013 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013011798 | CIP-005-1 | R1 | Medium | Moderate | 11/26/2013 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013011799 | CIP-005-1 | R2 | Medium | Minimal | 1/20/2014 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013011800 | CIP-005-1 | R3 | Medium | Minimal | 1/20/2014 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013011801 | CIP-005-1 | R4 | Medium | Moderate | 12/9/2013 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013012844 | CIP-005-3a | R5 | Lower | Minimal | 9/20/2013 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013011802 | CIP-006-1 | R1 | Medium | Minimal | 11/4/2013 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013012355 | CIP-006-1 | R1 | Medium | Minimal | 1/14/2014 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013012752 | CIP-006-2 | R3 | Medium | Minimal | 10/9/2013 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013012845 | CIP-006-2 | R1 | Medium | Minimal | 9/17/2013 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013012533 | CIP-006-2a | R6 | Lower | Minimal | 12/4/2012 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013013117 | CIP-006-3c | R5 | Medium | Minimal | 10/29/2013 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013011804 | CIP-007-1 | R1 | Medium | Moderate | 3/3/2014 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013011805 | CIP-007-1 | R2 | Medium | Moderate | 11/4/2013 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013011806 | CIP-007-1 | R3 | Lower | Moderate | 5/2/2014 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013011807 | CIP-007-1 | R5 | Lower | Moderate | 10/11/2013 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013011809 | CIP-007-3 | R8 | Medium | Moderate | 12/9/2013 | X |
| 10/30/2014 | NP15-5-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | SPP2013011808 | CIP-009-1 | R1 | Medium | Minimal | 6/26/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2013012232 | CIP-002-1 | R2 | High | Minimal | 3/14/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2013012261 | CIP-002-1 | R3; R3.1; R3.2 | High | Minimal | 4/18/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2013012233 | CIP-003-1 | R4; R4.3 | Medium | Moderate | 3/1/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2012011153 | CIP-003-1 | R5; R5.1; R5.2; R5.3 | Lower | Minimal | 2/22/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2012011159 | CIP-004-1 | R4; R4.1 | Lower | Minimal | 2/28/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2013012235 | CIP-005-1 | R1; R1.4; R1.6 | Medium | Minimal | 3/1/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2012011177 | CIP-005-3 | R5; R5.2 | Lower | Minimal | 3/1/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2013012262 | CIP-006-1 | R3 | Medium | Minimal | 4/19/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2013012624 | CIP-006-3c | R5 | Medium | Minimal | 11/20/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2013012625 | CIP-006-3c | R6 | Lower | Minimal | 11/20/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2012011178 | CIP-007-1 | R1; R1.1; R1.2; R1.3 | Medium | Moderate | 10/10/2012 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2013012968 | CIP-007-1 | R2; R2.1 | Medium | Minimal | 8/28/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2012010877 | CIP-007-1 | R4 | Medium | Minimal | 11/19/2012 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2013012234 | CIP-007-1 | R5; R5.1; R5.2; R5.3.3 | Medium | Moderate | 3/5/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2012011180 | CIP-007-2a | R9 | Lower | Minimal | 1/18/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2013012970 | CIP-007-3a | R1; R1.2; R1.3 | Medium | Minimal | 1/16/2014 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2012011179 | CIP-007-3a | R3; R3.1; R3.2 | Lower | Minimal | 2/26/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2013012971 | CIP-007-3a | R3; R3.2 | Lower | Minimal | 2/23/2014 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2013012972 | CIP-007-3a | R4; R4.2 | Medium | Minimal | 7/28/2013 | X |
| 10/30/2014 | NP15-6-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$106,000 | TRE2012011181 | CIP-008-3 | R1; R1.2 | Lower | Minimal | 3/1/2013 | X |
| 10/30/2014 | NP15-7-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$56,000 | TRE2013013144 | CIP-003-3 | R6 | Lower | Minimal | 5/7/2014 | X |
| 10/30/2014 | NP15-7-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | FRCC2014013420 | CIP-004-3a | R2; R2.3 | Lower | Minimal | 7/31/2014 | X |
| 10/30/2014 | NP15-7-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$56,000 | TRE2014013983 | CIP-005-1 | R1; R1.5 | Medium | Moderate | 9/30/2014 | X |
| 10/30/2014 | NP15-7-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | SPP2012011245 | CIP-005-3 | R1; R1.4; R1.5; R1.6 | Medium | Moderate | 4/30/2013 | X |
| 10/30/2014 | NP15-7-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | FRCC2014013346 | CIP-005-3a | R3; R3.2 | Medium | Moderate | 2/18/2014 | X |
| 10/30/2014 | NP15-7-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | FRCC2014013355 | CIP-005-3a | R1; R1.1; R1.6 | Medium | Moderate | 7/15/2014 | X |
| 10/30/2014 | NP15-7-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | SPP2012011244 | CIP-005-3a | R2; R2.1 | Medium | Minimal | 4/26/2013 | X |
| 10/30/2014 | NP15-7-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | SPP2012011246 | CIP-006-3a | R2; R2.2 | Medium | Moderate | 4/26/2013 | X |
| 10/30/2014 | NP15-7-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$56,000 | TRE2013012881 | CIP-007-1 | R1; R1.2 | Lower | Minimal | 2/21/2014 | X |
| 10/30/2014 | NP15-7-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$56,000 | TRE2013012882 | CIP-007-1 | R4; R4.2 | Medium | Minimal | 4/7/2014 | X |
| 10/30/2014 | NP15-7-000 | Texas RE | Unidentified Registered Entity | NCRXXXXXX | \$56,000 | TRE2014013369 | CIP-007-1 | R5 | Lower | Minimal | 5/1/2014 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|--------------------------------|---|--|----------------------------|------------------------------------|
| 10/30/2014 | NP15-7-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$25,000 | FRCC2014013414 | CIP-007-1 | R3; R3.1 | Lower | Moderate | 4/10/2014 | X |
| 10/30/2014 | NP15-7-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$25,000 | FRCC2014013357 | CIP-007-3a | R2; R2.1; R2.2; R2.3 | Medium | Moderate | 6/17/2014 | X |
| 10/30/2014 | NP15-7-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SPP2012011247 | CIP-007-3a | R4; R4.2 | Medium | Moderate | 4/26/2013 | X |
| 10/30/2014 | NP15-7-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$10,000 | SPP2012011248 | CIP-007-3a | R3; R3.2 | Lower | Moderate | 4/26/2013 | X |
| 10/30/2014 | NP15-7-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$0 | TRE2014013515 | CIP-007-3a | R5; R5.3.3 | Medium | Moderate | 5/3/2014 | X |
| 10/30/2014 | NP15-7-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$25,000 | FRCC2014013354 | CIP-008-3 | R1; R1.2 | Lower | Moderate | 4/4/2014 | X |
| 11/25/2014 | NP15-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC2013012579 | CIP-002-2 | R3; R3.3 | High | Moderate | 11/27/2013 | X |
| 11/25/2014 | NP15-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC2013012308 | CIP-005-3a | R1; R1.5 | Medium | Minimal | 5/17/2013 | X |
| 11/25/2014 | NP15-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC2013012582 | CIP-007-3a | R7; R7.1 | Lower | Minimal | 9/13/2013 | X |
| 11/25/2014 | NP15-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$150,000 | WECC2013012583 | CIP-007-3a | R8; R8.2 | Medium | Moderate | 10/31/2013 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2013012304 | CIP-002-1 | R3 | High | Moderate | 5/15/2014 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2012010916 | CIP-003-3 | R2 | Medium | Minimal | 10/23/2012 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2012010917 | CIP-003-3 | R3 | Lower | Minimal | 10/23/2012 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2012010328 | CIP-004-3 | R2 | Lower | Minimal | 7/23/2012 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2012010918 | CIP-005-1 | R1.5 | Medium | Moderate | 8/25/2012 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2013012307 | CIP-005-1 | R2 | Medium | Moderate | 5/15/2014 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2013012318 | CIP-005-1 | R4 | Medium | Minimal | 5/15/2014 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2012011370 | CIP-005-2 | R1.5 | Medium | Moderate | 5/15/2014 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2012011084 | CIP-005-3a | R1.5 | Medium | Moderate | 2/15/2013 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2013012319 | CIP-006-2 | R1 | Medium | Minimal | 5/15/2014 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2012011366 | CIP-006-2 | R2.2 | Medium | Moderate | 5/15/2014 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2012011373 | CIP-007-1 | R1 | Medium | Moderate | 5/15/2014 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2012011372 | CIP-007-2a | R2 | Medium | Moderate | 5/15/2014 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2012010919 | CIP-007-2a | R5 | Lower | Minimal | 8/25/2012 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2013012439 | CIP-007-2a | R6 | Lower | Minimal | 5/15/2014 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2012011371 | CIP-007-2a | R8 | Medium | Serious | 5/15/2014 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2013012320 | CIP-008-1 | R1 | Lower | Moderate | 5/15/2014 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2013012321 | CIP-009-1 | R1 | Medium | Moderate | 5/15/2014 | X |
| 11/25/2014 | NP15-11-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$175,000 | RFC2013012463 | CIP-009-1 | R5 | Lower | Minimal | 5/15/2014 | X |
| 11/25/2014 | NP15-8-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | WECC2014013490 | CIP-002-3 | R2 | High | Minimal | 2/28/2014 | X |
| 11/25/2014 | NP15-8-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | WECC2014013491 | CIP-002-3 | R3 | High | Minimal | 2/28/2014 | X |
| 11/25/2014 | NP15-8-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | WECC2014013492 | CIP-002-3 | R4 | Lower | Minimal | 2/28/2014 | X |
| 11/25/2014 | NP15-8-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO2012010574 | CIP-004-1 | R4; 4.1; 4.2 | Medium | Moderate | 8/31/2014 | X |
| 11/25/2014 | NP15-8-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO2012010804 | CIP-005-1 | R1; 1.5 | Medium | Moderate | 7/13/2014 | X |
| 11/25/2014 | NP15-8-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | WECC2013012248 | CIP-005-3 | R2; R2.1; R2.2; R2.4 | Medium | Minimal | 10/13/2014 | X |
| 11/25/2014 | NP15-8-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | WECC2013012249 | CIP-005-3 | R4; R4.2; R4.4 | Medium | Minimal | 10/13/2014 | X |
| 11/25/2014 | NP15-8-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | WECC2012011507 | CIP-005-3a R1 | R1; R1.5 | Medium | Moderate | 12/13/2012 | X |
| 11/25/2014 | NP15-8-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO2012010805 | CIP-006-1 | R1; 1.8 | Medium | Moderate | 7/13/2012 | X |
| 11/25/2014 | NP15-8-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | WECC2013012201 | CIP-006-3c | R3 | Medium | Minimal | 8/21/2014 | X |
| 11/25/2014 | NP15-8-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | WECC2013012203 | CIP-006-3c | R4 | Medium | Minimal | 6/6/2014 | X |
| 11/25/2014 | NP15-8-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | WECC2013012204 | CIP-006-3c | R5 | Medium | Minimal | 6/27/2014 | X |
| 11/25/2014 | NP15-8-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$0 | MRO2012010806 | CIP-007-1 | R5; 5.3.3 | Medium | Minimal | 7/13/2012 | X |
| 11/25/2014 | NP15-8-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$38,000 | WECC2013012226 | CIP-007-3a | R2; R2.1; R2.2 | Medium | Minimal | 10/13/2014 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$150,000 | MRO201100289 | CIP-003-1 | R6 | Lower | Moderate | 3/22/2012 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$150,000 | MRO2012009882 | CIP-003-2 | R5; R5.1.1; R5.1.2; R5.2; R5.3 | Lower | Serious | 6/27/2012 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$150,000 | MRO201100322 | CIP-004-1 | R4; R4.1 | Lower | Minimal | 6/21/2011 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$150,000 | MRO201100323 | CIP-004-2 | R3; R3.1; R3.2 | Medium | Serious | 12/19/2011 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$150,000 | MRO2012010698 | CIP-004-3 | R4; R4.1; R4.2 | Lower | Minimal | 6/17/2013 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$150,000 | MRO201100287 | CIP-005-1 | R1; R1.5 | Medium | Moderate | 11/22/2011 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$150,000 | MRO2012009900 | CIP-005-1 | R1; R1.5; R1.6 | Medium | Moderate | 11/28/2012 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$150,000 | MRO201100288 | CIP-005-1 | R5; R5.1; R5.2 | Lower | Minimal | 3/22/2012 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$150,000 | MRO201100325 | CIP-006-1 | R1; R1.2; R1.3; R1.7 | Medium | Minimal | 4/2/2011 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$150,000 | MRO2012009899 | CIP-006-1 | R1; R1.8 | Lower | Serious | 11/28/2012 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$150,000 | MRO2012011501 | CIP-006-1 | R1; R1.8 | Lower | Moderate | 5/29/2013 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------------------|---|--|--------------------------------------|------------------------------------|
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | SPP2012010242 | CIP-006-1 | R1; R1.8 | Lower | Moderate | 1/5/2015 (approved completion date) | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | MRO201100290 | CIP-006-3a | R2; R2.1; R2.2 | Medium | Serious | 11/22/2011 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | MRO2012010967 | CIP-006-3c | R4 | Medium | Minimal | 4/25/2012 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | MRO2012010966 | CIP-006-3c | R6 | Lower | Minimal | 5/12/2012 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | MRO201000232 | CIP-007-1 | R5; R5.2.3 | Medium | Minimal | 6/30/2011 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | MRO2012009992 | CIP-007-1 | R5; R5.3.1; R5.3.2; R5.3.3 | Medium | Serious | 12/5/2012 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | MRO201100292 | CIP-007-1 | R7; R7.1; R7.2 | Lower | Minimal | 3/22/2012 | X |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | SPP2012010241 | CIP-007-1 | R3 | Lower | Moderate | 1/18/2013 | X |
| 12/30/2014 | NP15-13-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013013030 | CIP-007-3a | R3 | Lower | Minimal | 9/4/2013 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012483 | CIP-002-1 | R3 | High | Minimal | 4/24/2014 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2014013371 | CIP-003-3 | R6 | Lower | Minimal | 9/30/2014 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012237 | CIP-004-3 | R4 | Lower | Minimal | 7/31/2013 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013011770 | CIP-005-1 | R1.1 | Medium | Minimal | 8/29/2014 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012498 | CIP-005-1 | R1.1 | Medium | Minimal | 6/26/2012 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012488 | CIP-005-1 | R1.5 | Medium | Minimal | 1/15/2014 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012496 | CIP-005-1 | R1.5 | Medium | Minimal | 6/26/2012 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013011754 | CIP-005-2 | R1.5 | Medium | Minimal | 4/8/2013 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012240 | CIP-005-3a | R3 | Medium | Minimal | 4/30/2013 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013011761 | CIP-006-1 | R1.1 | Medium | Minimal | 11/4/2013 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012242 | CIP-006-1 | R1.8 | Medium | Serious | 7/1/2014 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012244 | CIP-006-1 | R1.8 | Medium | Serious | 6/26/2012 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012490 | CIP-006-1 | R3 | Medium | Moderate | 2/20/2014 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012495 | CIP-006-1 | R3 | Medium | Moderate | 6/26/2012 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013011763 | CIP-006-3c | R5 | Medium | Minimal | 9/18/2012 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012486 | CIP-007-1 | R1 | Medium | Moderate | 4/14/2014 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012487 | CIP-007-1 | R2.2 | Medium | Serious | 4/7/2014 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012532 | CIP-007-1 | R3 | Lower | Moderate | 5/13/2014 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012243 | CIP-007-1 | R6 | Medium | Moderate | 6/19/2013 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012489 | CIP-007-1 | R8.3 | Medium | Moderate | 12/18/2013 | X |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | SERC2013012491 | CIP-009-1 | R1 | Medium | Minimal | 5/6/2014 | X |
| 12/30/2014 | NP15-17-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | WECC2013012030 | CIP-002-1 | R3; R3.2 | Lower | Minimal | 6/27/2013 | X |
| 12/30/2014 | NP15-17-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | WECC2013012032 | CIP-004-1 | R2; R2.2 | Medium | Minimal | 6/26/2013 | X |
| 12/30/2014 | NP15-17-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | WECC2013012685 | CIP-004-1 | R4; R4.1 | Lower | Minimal | 12/30/2013 | X |
| 12/30/2014 | NP15-17-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | WECC2013012326 | CIP-005-1 | R1; R1.5 | Medium | Minimal | 1/29/2014 | X |
| 12/30/2014 | NP15-17-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | WECC2013012935 | CIP-005-1 | R2; R2.1 | Medium | Minimal | 6/25/2014 | X |
| 12/30/2014 | NP15-17-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | WECC2013012937 | CIP-005-3a | R4 | Medium | Minimal | 12/30/2013 | X |
| 12/30/2014 | NP15-17-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | WECC2013012327 | CIP-006-1 | R1; R1.8 | Medium | Minimal | 1/29/2014 | X |
| 12/30/2014 | NP15-17-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | WECC2013012946 | CIP-006-3c | R8 | Medium | Minimal | 1/22/2014 | X |
| 12/30/2014 | NP15-17-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | WECC2013012939 | CIP-007-1 | R5; R5.2 | Lower | Minimal | 9/11/2013 | X |
| 12/30/2014 | NP15-17-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | WECC2013012940 | CIP-007-1 | R6; R6.1 | Medium | Minimal | 2/22/2014 | X |
| 12/30/2014 | NP15-17-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | WECC2013012938 | CIP-007-3a | R8; R8.4 | Medium | Minimal | 12/30/2013 | X |
| 12/30/2014 | NP15-17-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | WECC2013012033 | CIP-009-1 | R1 | Medium | Minimal | 1/29/2014 | X |
| 12/30/2014 | NP15-17-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$120,000 | WECC2013012034 | CIP-009-2 | R4 | Lower | Minimal | 1/29/2014 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$29,000 | SERC2014013403 | CIP-002-1 | R3 | High | Minimal | 2/4/2014 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC2012009709 | CIP-002-1 | R1 | Medium | Moderate | 11/10/2011 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC2012009712 | CIP-003-1 | R2 | Medium | Moderate | 11/10/2011 | X |
| 12/30/2014 | NP15-18-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012741 | CIP-003-3 | R6 | Lower | Moderate | 7/24/2013 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | SERC2013012824 | CIP-004-3 | R4; R4.1 | Lower | Minimal | 10/18/2013 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$29,000 | SERC2013012994 | CIP-004-3 | R4 | Lower | Minimal | 9/17/2013 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC2011007238 | CIP-004-3 | R4 | Lower | Minimal | 10/31/2012 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | SERC2014013882 | CIP-004-3a | R4; R4.1; R4.2 | Lower | Minimal | 7/29/2014 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$29,000 | SERC2013012155 | CIP-005-1 | R1; R1.5 | Medium | Moderate | 8/13/2013 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC2012009713 | CIP-005-1 | R1; R1.5 | Medium | Moderate | 7/11/2013 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC2012009714 | CIP-005-1 | R3; R3.2 | Medium | Moderate | 6/27/2013 | X |
| 12/30/2014 | NP15-18-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$65,000 | WECC2013011963 | CIP-005-3 | R2 | Medium | Minimal | 3/20/2013 | X |
| 12/30/2014 | NP15-18-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$65,000 | WECC2013011964 | CIP-005-3a | R4 | Medium | Minimal | 6/21/2013 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | SERC2013012941 | CIP-005-3a | R1; R1.5 | Medium | Moderate | 2/10/2015 (approved completion date) | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | SERC2013012942 | CIP-005-3a | R2; R2.1; R2.4; R2.5 | Medium | Moderate | 2/10/2015 (approved completion date) | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$29,000 | SERC2013012520 | CIP-005-3a | R1 | Medium | Moderate | 9/30/2014 | X |
| 12/30/2014 | NP15-18-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$0 | WECC2014013752 | CIP-005-3a | R1; R1.5 | Medium | Minimal | 6/13/2014 | X |
| 12/30/2014 | NP15-18-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$0 | WECC2014013727 | CIP-005-3a | R1; R1.5 | Medium | Minimal | 6/13/2014 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC2012009715 | CIP-006-1 | R1; R1.8 | Medium | Moderate | 7/11/2013 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|------------------------------------|---|--|--------------------------------------|------------------------------------|
| 12/30/2014 | NP15-18-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$65,000 | WECC2013011875 | CIP-006-1 | R1 | Medium | Minimal | 3/13/2014 (Accepted CMP date) | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC2012009722 | CIP-006-3a | R1; R1.7 | Lower | Minimal | 4/27/2012 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$29,000 | SERC2013011812 | CIP-006-3c | R4 | Medium | Minimal | 12/5/2012 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$29,000 | SERC2013012154 | CIP-006-3c | R2; R2.2 | Medium | Moderate | 9/30/2014 | X |
| 12/30/2014 | NP15-18-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$65,000 | WECC2012011493 | CIP-007-1 | R2 | Medium | Minimal | 10/31/2013 | X |
| 12/30/2014 | NP15-18-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$65,000 | WECC2012011494 | CIP-007-1 | R3 | Lower | Minimal | 9/5/2014 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC2011007222 | CIP-007-1 | R6 | Lower | Minimal | 10/17/2012 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC2012009716 | CIP-007-1 | R2; R2.2 | Medium | Moderate | 3/31/2013 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC2012009717 | CIP-007-1 | R4 | Medium | Minimal | 1/29/2013 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC2012009718 | CIP-007-1 | R3 | Lower | Minimal | 11/30/2012 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC2012009719 | CIP-007-1 | R5; R5.3 | Medium | Minimal | 1/15/2013 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$0 | SERC2012009721 | CIP-007-1 | R8; R8.2 | Lower | Moderate | 3/31/2013 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | SERC2013012825 | CIP-007-3a | R1 | Medium | Minimal | 6/6/2014 | X |
| 12/30/2014 | NP15-18-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | SERC2013012826 | CIP-007-3a | R6 | Lower | Minimal | 11/17/2013 | X |
| 12/30/2014 | NP15-18-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$65,000 | WECC2013012008 | CIP-007-3a | R5 | Lower | Minimal | 5/20/2013 | X |
| 1/30/2015 | NP15-19-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2014013427 | CIP-002-1 | R3 | High | Moderate | 9/30/2014 | X |
| 1/30/2015 | NP15-19-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | No Penalty | SPP2012011085 | CIP-005-1 | R1 | Medium | Minimal | 10/12/2012 | X |
| 1/30/2015 | NP15-19-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | No Penalty | SPP2012010987 | CIP-005-1 | R2; R2.1; R2.2; R2.4 | Medium | Moderate | 6/6/2014 | X |
| 1/30/2015 | NP15-19-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | No Penalty | SPP2012010645 | CIP-006-1 | R1.8 | Medium | Moderate | 10/30/2013 | X |
| 1/30/2015 | NP15-19-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | No Penalty | SPP2012010644 | CIP-007-1 | R3; R3.1; R3.2 | Lower | Moderate | 1/2/2013 | X |
| 1/30/2015 | NP15-19-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | No Penalty | SPP2012011415 | CIP-007-1 | R5; R5.1.2, R5.1.3, R5.2.3, R5.3.3 | Medium | Moderate | 9/15/2014 | X |
| 1/30/2015 | NP15-19-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | No Penalty | SPP2012011416 | CIP-007-1 | R6 | Lower | Moderate | 1/2/2014 | X |
| 1/30/2015 | NP15-19-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | No Penalty | SPP2012011410 | CIP-007-2a | R1 | Medium | Moderate | 8/2/2013 | X |
| 1/30/2015 | NP15-19-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2014013705 | CIP-009-1 | R4 | Lower | Moderate | 11/24/2014 | X |
| 2/26/2015 | NP15-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2013012689 | CIP-002-1 | R3 | High | Minimal | 8/14/2013 | X |
| 2/26/2015 | NP15-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2013012691 | CIP-005-1 | R1; R1.1; R1.5 | Medium | Moderate | 11/29/2013 | X |
| 2/26/2015 | NP15-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2014013574 | CIP-005-1 | R1; R1.4 | Medium | Minimal | 2/1/2013 | X |
| 2/26/2015 | NP15-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2013011676 | CIP-005-1 | R3 | Medium | Moderate | 12/19/2012 | X |
| 2/26/2015 | NP15-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2013012693 | CIP-006-1 | R3 | Medium | Moderate | 9/23/2013 | X |
| 2/26/2015 | NP15-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2013011702 | CIP-006-3c | R1; R1.1; R1.6 | Medium | Minimal | 5/11/2013 | X |
| 2/26/2015 | NP15-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2013012695 | CIP-007-1 | R1 | Medium | Minimal | 9/25/2013 | X |
| 2/26/2015 | NP15-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2013012694 | CIP-007-1 | R2; R2.1 | Medium | Minimal | 8/13/2013 | X |
| 2/26/2015 | NP15-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2012009565 | CIP-007-1 | R3 | Lower | Serious | 10/11/2013 | X |
| 2/26/2015 | NP15-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2012009647 | CIP-007-1 | R4 | Medium | Moderate | 6/1/2013 | X |
| 2/26/2015 | NP15-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2012009566 | CIP-007-1 | R5; R5.2; R5.3 | Medium | Moderate | 3/10/2013 | X |
| 2/26/2015 | NP15-20-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$70,000 | SERC2012009564 | CIP-007-1 | R6 | Medium | Moderate | 2/2/2012 | X |
| 2/26/2015 | NP15-22-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | WECC2014014210 | CIP 005-3a | R2 | Medium | Minimal | 9/8/2014 | X |
| 2/26/2015 | NP15-22-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | WECC2014014214 | CIP 007-3a | R8 | Medium | Minimal | 10/3/2014 | X |
| 2/26/2015 | NP15-22-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | SERC2013013082 | CIP-004-3a | R4 | Lower | Minimal | 11/20/2013 | X |
| 2/26/2015 | NP15-22-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | SERC2014013341 | CIP-004-3a | R4; R4.2 | Lower | Minimal | 10/15/2014 | X |
| 2/26/2015 | NP15-22-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$0 | NPCC2014013398 | CIP-004-3a | R4; R4.2 | Lower | Moderate | 4/25/2014 | X |
| 2/26/2015 | NP15-22-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | SERC2013013058 | CIP-006-3c | R1; R 1.1; R1.6; R1.6.1 | Medium | Minimal | 4/27/2015 (approved completion date) | X |
| 2/26/2015 | NP15-22-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | SERC2014013342 | CIP-006-3c | R5 | Medium | Moderate | 7/21/2014 | X |
| 2/26/2015 | NP15-22-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$20,000 | SERC2014013620 | CIP-007-3a | R5; R5.3; R5.3.3 | Medium | Minimal | 6/30/2014 | X |
| 2/26/2015 | NP15-22-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$0 | NPCC2013012894 | CIP-007-3a | R4; R4.2 | Medium | Minimal | 11/6/2014 | X |
| 2/26/2015 | NP15-22-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$0 | NPCC2014013576 | CIP-007-3a | R5; R5.3; R5.3.3 | Medium | Minimal | 4/15/2014 | X |
| 3/31/2015 | NP15-23-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | WECC2014013750 | CIP-003-3 | R6 | Lower | Minimal | 8/29/2014 | X |
| 3/31/2015 | NP15-23-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | WECC2014013890 | CIP-004-3a | R4; R4.2 | Lower | Minimal | 2/16/2015 | X |
| 3/31/2015 | NP15-23-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$65,000 | WECC2013012654 | CIP-004-3a | R2 | Lower | Minimal | 8/16/2013 | X |
| 3/31/2015 | NP15-23-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | WECC2014013503 | CIP-005-3a | R5; R5.2 | Lower | Minimal | 1/9/2014 | X |
| 3/31/2015 | NP15-23-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$65,000 | WECC2014013374 | CIP-005-3a | R2 | Medium | Moderate | 5/9/2014 | X |
| 3/31/2015 | NP15-23-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | WECC2014013504 | CIP-006-1 | R1; R1.8 | Medium | Minimal | 8/30/2014 | X |
| 3/31/2015 | NP15-23-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$65,000 | WECC2014013375 | CIP-006-3a | R2 | Medium | Minimal | 11/12/2014 | X |
| 3/31/2015 | NP15-23-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | WECC2014013751 | CIP-007-3a | R1 | Medium | Minimal | 8/29/2014 | X |
| 3/31/2015 | NP15-23-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | WECC2014013505 | CIP-007-3a | R3 | Lower | Minimal | 6/26/2014 | X |
| 3/31/2015 | NP15-23-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$85,000 | WECC2014013897 | CIP-007-3a | R8; R8.2; R8.3 | Lower | Moderate | 11/5/2014 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------------------------|---|--|---------------------------------------|------------------------------------|
| 3/31/2015 | NP15-23-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$65,000 | WECC2014013373 | CIP-007-3a | R8 | Lower | Minimal | 12/15/2014 | X |
| 3/31/2015 | NP15-23-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$15,000 | WECC2014014001 | CIP-007-3a | R6; R6.4; R6.5 | Lower | Minimal | 8/1/2014 | X |
| 4/30/2015 | NP15-24-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2013013201 | CIP-005-1 | R1: R1.5 | Medium | Serious | 12/5/2014 | X |
| 4/30/2015 | NP15-24-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2013013202 | CIP-005-1 | R2: R2.1, R2.2 | Medium | Serious | 9/30/2014 | X |
| 4/30/2015 | NP15-24-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2013013203 | CIP-005-1 | R3: R3.2 | Medium | Serious | 3/31/2014 | X |
| 4/30/2015 | NP15-24-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2013013204 | CIP-005-1 | R4 | Medium | Serious | 9/30/2014 | X |
| 4/30/2015 | NP15-24-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2013013205 | CIP-006-1 | R1: R1.8 | Medium | Serious | 10/31/2014 | X |
| 4/30/2015 | NP15-24-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2013013206 | CIP-007-1 | R1 | Lower | Serious | 9/30/2014 | X |
| 4/30/2015 | NP15-24-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2013013207 | CIP-007-1 | R2: R2.1, R2.2 | Medium | Serious | 8/31/2014 | X |
| 4/30/2015 | NP15-24-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2013013208 | CIP-007-1 | R3: R3.2 | Lower | Serious | 10/31/2014 | X |
| 4/30/2015 | NP15-24-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2013013209 | CIP-007-1 | R4: R4.1 | Medium | Serious | 2/28/2014 | X |
| 4/30/2015 | NP15-24-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2013013210 | CIP-007-1 | R5: R5.1.2, R5.2 | Medium | Serious | 8/31/2014 | X |
| 4/30/2015 | NP15-24-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2013013211 | CIP-007-1 | R6: R6.1, R6.2, R6.4, R6.5 | Medium | Serious | 3/31/2014 | X |
| 4/30/2015 | NP15-24-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2013013212 | CIP-007-1 | R7 | Lower | Minimal | 2/28/2014 | X |
| 4/30/2015 | NP15-24-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2013013213 | CIP-007-1 | R8: R8.1, R8.2, R8.3 | Medium | Serious | 9/30/2014 | X |
| 4/30/2015 | NP15-24-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2013013254 | CIP-007-3a | R3 | Lower | Serious | 10/31/2014 | X |
| 4/30/2015 | NP15-24-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2013013214 | CIP-009-1 | R5 | Lower | Serious | 4/30/2014 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012011269 | CIP-002-3 | R3.1 | Lower | Minimal | 12/31/2015 (approved completion date) | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012011263 | CIP-002-3 | R3.1 | Lower | Minimal | 12/31/2015 (approved completion date) | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2012011266 | CIP-002-3 | R3.1 | Lower | Minimal | 12/31/2015 (approved completion date) | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012717 | CIP-003-3 | R6 | Lower | Minimal | 8/5/2013 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012401 | CIP-004-3 | R4 | Lower | Minimal | 4/30/2013 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012512 | CIP-005-1 | R1.5 | Medium | Minimal | 6/4/2013 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012402 | CIP-005-3 | R5 | Lower | Minimal | 4/30/2013 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013013005 | CIP-006-1 | R1.1 | Medium | Minimal | 12/2/2014 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013013006 | CIP-006-1 | R1.1 | Medium | Minimal | 12/2/2014 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013013007 | CIP-006-1 | R1.8 | Medium | Minimal | 1/9/2014 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012303 | CIP-006-3c | R1.1 | Medium | Minimal | 6/30/2013 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012409 | CIP-006-3c | R4 | Medium | Minimal | 8/9/2013 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012410 | CIP-007-1 | R2 | Medium | Moderate | 6/24/2014 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012413 | CIP-007-1 | R2 | Medium | Moderate | 6/24/2014 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012513 | CIP-007-1 | R3 | Lower | Minimal | 11/30/2014 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012514 | CIP-007-1 | R3 | Lower | Minimal | 11/30/2014 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012411 | CIP-007-1 | R5.2.1 | Medium | Minimal | 5/31/2013 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012412 | CIP-007-1 | R5.3.3 | Medium | Minimal | 4/30/2013 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012414 | CIP-007-1 | R5.3.3 | Medium | Minimal | 4/30/2013 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012753 | CIP-007-3a | R1 | Medium | Minimal | 12/13/2013 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012768 | CIP-007-3a | R1 | Medium | Minimal | 12/13/2013 | X |
| 4/30/2015 | NP15-26-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2013012718 | CIP-007-3a | R6 | Lower | Minimal | 4/30/2013 | X |
| 4/30/2015 | NP15-28-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | WECC2013013110 | CIP-006-1 | R1: R1.8 | Medium | Minimal | 12/19/2014 | X |
| 4/30/2015 | NP15-28-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$30,000 | WECC2013012851 | CIP-004-3a | R4 | Lower | Moderate | 11/24/2014 | X |
| 5/28/2015 | NP15-29-000 | RF | Unidentified Registered Entity | NCRXXXXXX | No Penalty | RFC200800463 | CIP-001-1 | R2 | Medium | Moderate | 4/30/2011 | X |
| 5/28/2015 | NP15-29-000 | RF | Unidentified Registered Entity | NCRXXXXXX | No Penalty | RFC200800464 | CIP-001-1 | R3 | Medium | Moderate | 4/30/2011 | X |
| 5/28/2015 | NP15-29-000 | RF | Unidentified Registered Entity | NCRXXXXXX | No Penalty | RFC200900462 | CIP-001-1 | R1 | Medium | Moderate | 4/30/2011 | X |
| 5/28/2015 | NP15-29-000 | RF | Unidentified Registered Entity | NCRXXXXXX | No Penalty | RFC201006698 | CIP-001-1 | R4 | Medium | Moderate | 4/30/2011 | X |
| 5/28/2015 | NP15-29-000 | RF | Unidentified Registered Entity | NCRXXXXXX | No Penalty | RFC201006699 | CIP-002-1 | R1 | Medium | Moderate | 6/6/2011 | X |
| 5/28/2015 | NP15-29-000 | RF | Unidentified Registered Entity | NCRXXXXXX | No Penalty | RFC201000700 | CIP-002-1 | R2 | High | Moderate | 6/6/2011 | X |
| 5/28/2015 | NP15-29-000 | RF | Unidentified Registered Entity | NCRXXXXXX | No Penalty | RFC201000701 | CIP-002-1 | R3 | High | Moderate | 6/6/2011 | X |
| 5/28/2015 | NP15-29-000 | RF | Unidentified Registered Entity | NCRXXXXXX | No Penalty | RFC201000702 | CIP-002-1 | R4 | Lower | Moderate | 6/6/2011 | X |
| 5/28/2015 | NP15-29-000 | RF | Unidentified Registered Entity | NCRXXXXXX | No Penalty | RFC2011001222 | CIP-003-1 | R2.1 | Lower | Minimal | 11/1/2011 | X |
| 5/28/2015 | NP15-29-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$13,000 | FRCC2014014007 | CIP-003-3 | R1 | Medium | Moderate | 1/23/2015 | X |
| 5/28/2015 | NP15-29-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | FRCC2014014158 | CIP-005-3a | R1; R1.5 | Medium | Moderate | 12/19/2014 | X |
| 5/28/2015 | NP15-29-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | FRCC2014014161 | CIP-005-3a | R4; R4.2 | Medium | Moderate | 9/1/2014 | X |
| 5/28/2015 | NP15-29-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$50,000 | FRCC2014013853 | CIP-006-3c | R2; R2.1; R2.2 | Medium | Moderate | 4/1/2015 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|--|---|--|---------------------------------------|------------------------------------|
| 5/28/2015 | NP15-29-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | FRCC2014014159 | CIP-006-3c | R2; R2.2 | Medium | Moderate | 12/19/2014 | X |
| 5/28/2015 | NP15-29-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | FRCC2014013999 | CIP-007-3a | R5; R5.2.1; R5.3.3 | Lower | Moderate | 1/27/2015 | X |
| 5/28/2015 | NP15-29-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | FRCC2014014157 | CIP-007-3a | R8; R8.2 | Medium | Moderate | 12/19/2014 | X |
| 5/28/2015 | NP15-29-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$13,000 | FRCC2014014081 | CIP-007-3a | R6; R6.4; R6.5 | Lower | Minimal | 12/18/2014 | X |
| 6/30/2015 | NP15-30-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$10,000 | WECC2013011657 | CIP 002-1 | R3; R3.3 | High | Minimal | 6/30/2013 | X |
| 6/30/2015 | NP15-30-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2013011816 | CIP-005-3a | R2; R2.2; R2.4 | Medium | Minimal | 5/21/2013 | X |
| 6/30/2015 | NP15-30-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2013011817 | CIP-005-3a | R1; R1.4 | Medium | Moderate | 7/31/2013 | X |
| 6/30/2015 | NP15-30-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2013012550 | CIP-005-3a | R1; R1.5 | Medium | Moderate | 8/23/2013 | X |
| 6/30/2015 | NP15-30-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2013012551 | CIP-005-3a | R3; R3.2 | Medium | Minimal | 10/23/2014 | X |
| 6/30/2015 | NP15-30-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC2014013772 | CIP-006-3c | R2; R2.2 | Medium | Minimal | 11/24/2014 | X |
| 6/30/2015 | NP15-30-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2013011818 | CIP-006-3c | R1; R1.1 | Medium | Minimal | 12/19/2012 | X |
| 6/30/2015 | NP15-30-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2013011819 | CIP-006-3c | R1; R1.6 | Medium | Minimal | 6/28/2013 | X |
| 6/30/2015 | NP15-30-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2013012862 | CIP-006-3c | R2; R2.2 | Medium | Moderate | 3/25/2014 | X |
| 6/30/2015 | NP15-30-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC2014013973 | CIP-007-1 | R2 | Medium | Moderate | 11/17/2014 | X |
| 6/30/2015 | NP15-30-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC2014013754 | CIP-007-3a | R1 | Medium | Minimal | 2/4/2014 | X |
| 6/30/2015 | NP15-30-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | WECC2014013628 | CIP-007-3a | R5; R5.1 | Medium | Minimal | 2/20/2014 | X |
| 6/30/2015 | NP15-30-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2013012555 | CIP-007-3a | R6 | Lower | Minimal | 8/1/2014 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010813 | CIP-003-1 | R1; R1.1; R1.2 | Medium | Minimal | 5/20/2013 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010814 | CIP-003-1 | R4 | Medium | Minimal | 2/26/2014 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010815 | CIP-003-1 | R5; R5.1 | Lower | Minimal | 11/17/2010 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010818 | CIP-004-1 | R3; R3.1; R3.2 | Medium | Minimal | 4/24/2015 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010819 | CIP-004-1 | R4; R4.2 | Lower | Moderate | 7/2/2014 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010817 | CIP-004-2 | R2; R2.1 | Medium | Moderate | 7/2/2014 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010820 | CIP-005-1 | R1; R1.5; R1.6 | Medium | Moderate | 12/30/2015 (approved completion date) | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010821 | CIP-005-1 | R2; R2.5 | Medium | Minimal | 2/27/2014 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010822 | CIP-005-1 | R3 | Medium | Moderate | 12/5/2014 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010823 | CIP-005-1 | R4; R4.1; R4.2; R4.3; R4.4; R4.5 | Medium | Moderate | 12/19/2014 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010824 | CIP-005-1 | R5; R5.1 | Lower | Minimal | 12/12/2014 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010837 | CIP-006-1 | R6; R6.1; R6.2; R6.3 | Medium | Minimal | 9/1/2012 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010651 | CIP-006-1 | R1; R1.2; R1.8 | Medium | Moderate | 10/31/2015 (approved completion date) | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010652 | CIP-006-1 | R3; R3.1 | Medium | Moderate | 9/1/2012 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010653 | CIP-006-1 | R4; R4.1 | Lower | Minimal | 9/1/2012 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010654 | CIP-006-1 | R5 | Lower | Minimal | 11/30/2012 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010826 | CIP-007-1 | R1; R1.1; R1.3 | Medium | Moderate | TBD | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010827 | CIP-007-1 | R2; R2.1 | Medium | Moderate | 6/30/2014 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010828 | CIP-007-1 | R3; R3.1; R3.2 | Lower | Moderate | 1/3/2014 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010829 | CIP-007-1 | R4; R4.2 | Medium | Moderate | 5/28/2013 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010830 | CIP-007-1 | R5; R5.1; R5.2.2; R5.2.3 | Medium | Moderate | 8/8/2014 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010831 | CIP-007-1 | R6; R6.1; R6.2; R6.5 | Medium | Moderate | 12/19/2014 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010833 | CIP-007-1 | R8; R8.1; R8.2; R8.3; R8.4 | Medium | Moderate | 12/19/2014 | X |
| 7/30/2015 | NP15-32-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2012010834 | CIP-007-1 | R9 | Medium | Minimal | 12/12/2014 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2013013255 | CIP-002-3 | R2 | High | Minimal | 12/13/2013 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2013013256 | CIP-002-3 | R2 | High | Minimal | 12/13/2013 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014057 | CIP-002-3 | R3 | High | Moderate | 4/29/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014058 | CIP-002-3 | R3 | High | Moderate | 4/29/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014059 | CIP-002-3 | R3 | High | Moderate | 4/29/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014013308 | CIP-003-1 | R6 | Lower | Minimal | 4/27/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014013311 | CIP-003-1 | R6 | Lower | Minimal | 4/27/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014013314 | CIP-003-1 | R6 | Lower | Minimal | 4/27/2015 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$)(The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|--|-------------------|----------------------|------------------|---|--|----------------------------|------------------------------------|
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014034 | CIP-003-3 | R2.3 | Medium | Minimal | 12/5/2014 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014035 | CIP-003-3 | R2.3 | Medium | Minimal | 12/5/2014 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014036 | CIP-003-3 | R2.3 | Medium | Minimal | 12/5/2014 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014031 | CIP-003-3 | R4 | Medium | Moderate | 5/1/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014032 | CIP-003-3 | R4 | Medium | Moderate | 5/1/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014033 | CIP-003-3 | R4 | Medium | Moderate | 5/1/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014028 | CIP-003-3 | R5.2 | Lower | Moderate | 4/30/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014029 | CIP-003-3 | R5.2 | Lower | Moderate | 4/30/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014030 | CIP-003-3 | R5.2 | Lower | Moderate | 4/30/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2013012765 | CIP-003-3 | R6 | Lower | Minimal | 4/16/2013 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013710 | CIP-004-3a | R2 | Medium | Moderate | 12/19/2014 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013714 | CIP-004-3a | R4 | Lower | Serious | 5/20/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013693 | CIP-004-3a | R4 | Lower | Moderate | 5/20/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013695 | CIP-004-3a | R4 | Lower | Moderate | 5/20/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014169 | CIP-005-1 | R4 | Medium | Moderate | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014170 | CIP-005-1 | R4 | Medium | Moderate | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014171 | CIP-005-1 | R4 | Medium | Moderate | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014025 | CIP-005-3a | R1.4, R1.6 | Medium | Minimal | 4/29/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014026 | CIP-005-3a | R1.4, R1.6 | Medium | Minimal | 4/29/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014027 | CIP-005-3a | R1.4, R1.6 | Medium | Minimal | 4/29/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014054 | CIP-005-3a | R2.1, R2.2, R2.4 | Medium | Moderate | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014055 | CIP-005-3a | R2.1, R2.2, R2.4 | Medium | Moderate | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014056 | CIP-005-3a | R2.1, R2.2, R2.4 | Medium | Moderate | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013312 | CIP-005-3a | R2.2 | Medium | Minimal | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013332 | CIP-005-3a | R2.2 | Medium | Minimal | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013367 | CIP-005-3a | R2.2 | Medium | Minimal | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014051 | CIP-005-3a | R5.1 | Lower | Minimal | 4/29/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014052 | CIP-005-3a | R5.1 | Lower | Minimal | 4/29/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014053 | CIP-005-3a | R5.1 | Lower | Minimal | 4/29/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013309 | CIP-006-3c | R1.1 | Medium | Minimal | 2/10/2014 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014048 | CIP-006-3c | R1.1 | Medium | Minimal | 5/20/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014049 | CIP-006-3c | R1.1 | Medium | Minimal | 5/20/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014050 | CIP-006-3c | R1.1 | Medium | Minimal | 5/20/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014040 | CIP-006-3c | R1.1 | Medium | Minimal | 5/20/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014041 | CIP-006-3c | R1.1 | Medium | Minimal | 5/20/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014042 | CIP-006-3c | R1.1 | Medium | Minimal | 5/20/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013320 | CIP-006-3c | R1.6 | Medium | Minimal | 5/30/2014 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013326 | CIP-006-3c | R1.6 | Medium | Minimal | 5/30/2014 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013333 | CIP-006-3c | R1.6 | Medium | Minimal | 5/30/2014 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014044 | CIP-006-3c | R1.6.1 | Medium | Minimal | 5/20/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014046 | CIP-006-3c | R1.6.1 | Medium | Minimal | 5/20/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014047 | CIP-006-3c | R1.6.1 | Medium | Minimal | 5/20/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014037 | CIP-006-3c | R2.2 | Medium | Minimal | 5/22/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014038 | CIP-006-3c | R2.2 | Medium | Minimal | 5/22/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014039 | CIP-006-3c | R2.2 | Medium | Minimal | 5/22/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2015014591 | CIP-006-3c | R5 | Medium | Moderate | 3/10/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013310 | CIP-007-1 | R2.2 | Medium | Serious | 4/16/2013 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013313 | CIP-007-1 | R2.2 | Medium | Serious | 4/16/2013 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013315 | CIP-007-1 | R2.2 | Medium | Serious | 4/16/2013 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013692 | CIP-007-1 | R4 | Medium | Minimal | 4/13/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013694 | CIP-007-1 | R4 | Medium | Minimal | 4/13/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013696 | CIP-007-1 | R4 | Medium | Minimal | 4/13/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013324 | CIP-007-1 | R6.5 | Lower | Minimal | 5/21/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013330 | CIP-007-1 | R6.5 | Lower | Minimal | 5/21/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013338 | CIP-007-1 | R6.5 | Lower | Minimal | 5/21/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014060 | CIP-007-1 | R8.2, R8.3 | Medium | Serious | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014061 | CIP-007-1 | R8.2, R8.3 | Medium | Serious | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014062 | CIP-007-1 | R8.2, R8.3 | Medium | Serious | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013322 | CIP-007-3a | R1.3 | Lower | Serious | 3/13/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013327 | CIP-007-3a | R1.3 | Lower | Serious | 3/13/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013334 | CIP-007-3a | R1.3 | Lower | Serious | 3/13/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013335 | CIP-007-3a | R2 | Medium | Serious | 4/16/2013 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014072 | CIP-007-3a | R2.1, R2.2 | Medium | Serious | 4/16/2013 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014073 | CIP-007-3a | R2.1, R2.2 | Medium | Serious | 4/16/2013 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014014074 | CIP-007-3a | R2.1, R2.2 | Medium | Serious | 4/16/2013 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2013012767 | CIP-007-3a | R2.2 | Medium | Serious | 4/16/2013 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$425,000 | RFC2014013321 | CIP-007-3a | R3.1 | Lower | Moderate | 5/1/2015 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|--------------------------------------|---|--|------------------------------------|------------------------------------|
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014013328 | CIP-007-3a | R3.1 | Lower | Moderate | 5/1/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014013336 | CIP-007-3a | R3.1 | Lower | Moderate | 5/1/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014078 | CIP-007-3a | R3.1, R3.2 | Lower | Moderate | 5/1/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014079 | CIP-007-3a | R3.1, R3.2 | Lower | Moderate | 5/1/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014080 | CIP-007-3a | R3.1, R3.2 | Lower | Moderate | 5/1/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014069 | CIP-007-3a | R4.1, R4.2 | Medium | Minimal | 4/13/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014070 | CIP-007-3a | R4.1, R4.2 | Medium | Minimal | 4/13/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014071 | CIP-007-3a | R4.1, R4.2 | Medium | Minimal | 4/13/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014066 | CIP-007-3a | R5.1.2, R5.2, R5.2.1, R5.2.2, R5.2.3 | Medium | Serious | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014067 | CIP-007-3a | R5.1.2, R5.2, R5.2.1, R5.2.2, R5.2.3 | Medium | Serious | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014068 | CIP-007-3a | R5.1.2, R5.2, R5.2.1, R5.2.2, R5.2.3 | Medium | Serious | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014013428 | CIP-007-3a | R5.2, R5.3 | Lower | Moderate | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014009 | CIP-007-3a | R5 | Lower | Moderate | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014013323 | CIP-007-3a | R5.1.1, R5.1.3 | Lower | Moderate | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014013329 | CIP-007-3a | R5.1.1, R5.1.3 | Lower | Moderate | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014008 | CIP-007-3a | R5.1.1, R5.1.3 | Lower | Moderate | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014063 | CIP-007-3a | R6.1, R6.4 | Medium | Serious | 5/21/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014064 | CIP-007-3a | R6.1, R6.4 | Medium | Serious | 5/21/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014065 | CIP-007-3a | R6.1, R6.4 | Medium | Serious | 5/21/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014013325 | CIP-007-3a | R8 | Lower | Serious | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014013331 | CIP-007-3a | R8 | Lower | Serious | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014013339 | CIP-007-3a | R8 | Lower | Serious | 4/17/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014075 | CIP-008-3 | R1.6 | Lower | Moderate | 4/15/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014076 | CIP-008-3 | R1.6 | Lower | Moderate | 4/15/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014014077 | CIP-008-3 | R1.6 | Lower | Moderate | 4/15/2015 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014013378 | CIP-009-3 | R5 | Lower | Serious | 3/31/2014 | X |
| 8/31/2015 | NP15-33-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$425,000 | RFC2014013379 | CIP-009-3 | R5 | Lower | Serious | 3/31/2014 | X |
| 9/30/2015 | NP15-36-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2014014383 | CIP-006-3c | R5 | Medium | Minimal | 10/20/2014 | X |
| 10/29/2015 | NP16-1-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$0 | WECC2014014397 | CIP-004-3a | R3; R3.2 | Medium | Minimal | 9/15/2014 | X |
| 10/29/2015 | NP16-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC2013012102 | CIP-002-1 | R3 | High | Minimal | 12/19/2014 | X |
| 10/29/2015 | NP16-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC2013012387 | CIP-003-1 | R6 | Lower | Moderate | 5/30/2013 | X |
| 10/29/2015 | NP16-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC2012010893 | CIP-004-1 | R3 | Medium | Minimal | 10/4/2012 | X |
| 10/29/2015 | NP16-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC2013012363 | CIP-004-2 | R4 | Lower | Minimal | 8/30/2013 | X |
| 10/29/2015 | NP16-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC2013012357 | CIP-005-1 | R1 | Medium | Moderate | 8/2/2014 | X |
| 10/29/2015 | NP16-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC2013012459 | CIP-005-3 | R4 | Medium | Moderate | 12/20/2013 | X |
| 10/29/2015 | NP16-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC2013012466 | CIP-006-3a | R2, R2.2 | Medium | Minimal | 1/31/16 (approved completion date) | X |
| 10/29/2015 | NP16-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC2013012465 | CIP-006-3c | R1, R1.1 | Medium | Moderate | 8/1/2013 | X |
| 10/29/2015 | NP16-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC2014013599 | CIP-007-1 | R8 | Medium | Moderate | 12/31/2013 | X |
| 10/29/2015 | NP16-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$160,000 | WECC2013012460 | CIP-007-3a | R8 | Medium | Moderate | 12/20/2013 | X |
| 12/1/2015 | NP16-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$205,000 | WECC2014013523 | CIP-002-3 | R3 | High | Minimal | 8/22/2014 | X |
| 12/1/2015 | NP16-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$205,000 | WECC2014014131 | CIP-005-3a | R1 | Medium | Minimal | 2/2/2015 | X |
| 12/1/2015 | NP16-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$205,000 | WECC2014013524 | CIP-005-3a | R2 | Medium | Minimal | 7/20/2014 | X |
| 12/1/2015 | NP16-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$205,000 | WECC2014014129 | CIP-005-3a | R4 | Medium | Minimal | 12/31/2014 | X |
| 12/1/2015 | NP16-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$205,000 | WECC2014013525 | CIP-007-3a | R1 | Medium | Moderate | 7/25/2014 | X |
| 12/1/2015 | NP16-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$205,000 | WECC2014014130 | CIP-007-3a | R8 | Medium | Minimal | 8/14/2014 | X |
| 12/1/2015 | NP16-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$205,000 | WECC2014013526 | CIP-007-3a | R9 | Lower | Moderate | 7/25/2014 | X |
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC2013012023 | CIP-003-3 | R5 | Lower | Minimal | 5/23/2013 | X |
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC2014013497 | CIP-003-3 | R6 | Lower | Minimal | 12/12/2013 | X |
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC2012011467 | CIP-005-1 | R1 | Medium | Moderate | 3/19/2015 | X |
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC2013012367 | CIP-005-3a | R5 | Lower | Minimal | 5/16/2013 | X |
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC2013012368 | CIP-006-1 | R1 | Medium | Moderate | 9/6/2013 | X |
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC2013012025 | CIP-006-3c | R4 | Medium | Minimal | 6/15/2015 | X |
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC2012011598 | CIP-006-3c | R5 | Medium | Minimal | 8/27/2015 | X |
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC2012011599 | CIP-007-1 | R5 | Medium | Minimal | 4/23/2013 | X |
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC2014013498 | CIP-007-3a | R1 | Medium | Minimal | 7/22/2014 | X |
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC2014013658 | CIP-007-3a | R2 | Medium | Moderate | 1/16/2015 | X |
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$200,000 | WECC2013012369 | CIP-007-3a | R3 | Lower | Minimal | 5/10/2013 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$ (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.)) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|------------------|---|--|--------------------------------------|------------------------------------|
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$200,000 | WECC2014013499 | CIP-007-3a | R5 | Medium | Minimal | 4/17/2014 | X |
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$200,000 | WECC2013012370 | CIP-007-3a | R9 | Lower | Minimal | 5/17/2013 | X |
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$200,000 | WECC2014013500 | CIP-007-3a | R9 | Lower | Minimal | 1/15/2014 | X |
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$200,000 | WECC2013012029 | CIP-009-1 | R1 | Medium | Minimal | 9/30/2013 | X |
| 12/30/2015 | NP16-6-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$36,000 | WECC2013013158 | CIP 004-3a | R4; R4.1; R4.2 | Lower | Minimal | 11/21/2014 | X |
| 12/30/2015 | NP16-6-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$36,000 | WECC2014014532 | CIP 007-3a | R1 | Medium | Minimal | 1/28/2015 | X |
| 12/30/2015 | NP16-6-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$36,000 | WECC2014014533 | CIP 007-3a | R5 | Medium | Minimal | 1/28/2015 | X |
| 12/30/2015 | NP16-6-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$36,000 | WECC2014014534 | CIP 007-3a | R6 | Medium | Minimal | 1/28/2015 | X |
| 12/30/2015 | NP16-6-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$25,000 | WECC2015014891 | CIP-002-1 | R3; R3.1 | High | Moderate | 6/24/2015 | X |
| 12/30/2015 | NP16-6-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | MRO2013013014 | CIP-003-1 | R6 | Lower | Moderate | 2/26/2016 (approved completion date) | X |
| 12/30/2015 | NP16-6-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | MRO2013013017 | CIP-005-1 | R1; R1.5 | Medium | Moderate | 2/26/2016 (approved completion date) | X |
| 12/30/2015 | NP16-6-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$35,000 | SERC2014013394 | CIP-005-3a | R2; R2.1; R2.2 | Medium | Moderate | 8/11/2014 | X |
| 12/30/2015 | NP16-6-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$35,000 | SERC2014014449 | CIP-005-3a | R1; R1.5 | Medium | Moderate | 12/10/2014 | X |
| 12/30/2015 | NP16-6-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | MRO2013013018 | CIP-006-1 | R1; R1.8 | Medium | Moderate | 2/26/2016 (approved completion date) | X |
| 12/30/2015 | NP16-6-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$0 | WECC2014013850 | CIP-006-3c | R1 | Medium | Minimal | 1/20/2015 | X |
| 12/30/2015 | NP16-6-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$0 | WECC2015014620 | CIP-006-3c | R2; R2.2 | Medium | Minimal | 2/6/2015 | X |
| 12/30/2015 | NP16-6-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$0 | WECC2014014503 | CIP-006-3c | R6 | Lower | Minimal | 1/20/2015 | X |
| 12/30/2015 | NP16-6-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | MRO2013013021 | CIP-007-1 | R1; R1.1; R1.3 | Medium | Moderate | 1/29/2016 (approved completion date) | X |
| 12/30/2015 | NP16-6-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | MRO2013013022 | CIP-007-3a | R2; R2.2 | Medium | Moderate | 2/29/2016 (approved completion date) | X |
| 12/30/2015 | NP16-6-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$0 | WECC2014014498 | CIP-007-3a | R2 | Medium | Minimal | 2/20/2015 | X |
| 12/30/2015 | NP16-7-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$235,000 | SPP2013013217 | CIP-002-3 | R3.1 | Lower | Moderate | 9/10/2015 | X |
| 12/30/2015 | NP16-7-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$235,000 | SPP2013013218 | CIP-003-3 | R6 | Lower | Moderate | 9/10/2015 | X |
| 12/30/2015 | NP16-7-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$235,000 | SPP2013013224 | CIP-005-3a | R4.3, R4.5 | Medium | Moderate | 1/1/2015 | X |
| 12/30/2015 | NP16-7-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$235,000 | SPP2014013561 | CIP-005-3a | R3.2 | Medium | Moderate | 9/4/2015 | X |
| 12/30/2015 | NP16-7-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$235,000 | SPP2013013225 | CIP-006-3a | R2.2 | Medium | Moderate | 9/10/2015 | X |
| 12/30/2015 | NP16-7-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$235,000 | SPP2013013226 | CIP-007-3a | R1.1, R1.2, R1.3 | Medium | Moderate | 9/10/2015 | X |
| 12/30/2015 | NP16-7-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$235,000 | SPP2013013227 | CIP-007-3a | R2.1 | Medium | Moderate | 3/2/2015 | X |
| 12/30/2015 | NP16-7-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$235,000 | SPP2013013231 | CIP-007-3a | R6.2, R6.4 | Medium | Moderate | 9/10/2015 | X |
| 12/30/2015 | NP16-7-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$235,000 | SPP2014013565 | CIP-007-3a | R3.1, R3.2 | Lower | Moderate | 9/4/2015 | X |
| 12/30/2015 | NP16-7-000 | SPP RE | Unidentified Registered Entity | NCRXXXXXX | \$235,000 | SPP2014013566 | CIP-007-3a | R8.4 | Lower | Moderate | 1/12/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013798 | CIP-002-3 | R3 | High | Moderate | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013829 | CIP-003-3 | R1 | Medium | Moderate | 12/19/2013 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013830 | CIP-003-3 | R4 | Medium | Moderate | 6/27/2014 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013799 | CIP-003-3 | R5 | Lower | Moderate | 6/30/2014 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013800 | CIP-003-3 | R6 | Lower | Serious | 4/1/2013 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013831 | CIP-004-3 | R1 | Lower | Moderate | 3/30/2013 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013832 | CIP-004-3 | R2 | Lower | Serious | 6/27/2014 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013801 | CIP-004-3 | R4 | Lower | Moderate | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013446 | CIP-004-3a | R2.1 | Medium | Minimal | 1/30/2014 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013794 | CIP-004-3a | R4.1 | Lower | Minimal | 1/31/2014 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013802 | CIP-005-3a | R1 | Medium | Serious | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013803 | CIP-005-3a | R2 | Medium | Serious | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013804 | CIP-005-3a | R3 | Medium | Serious | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013805 | CIP-005-3a | R4 | Medium | Serious | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013833 | CIP-005-3a | R5 | Lower | Minimal | 2/1/2014 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013810 | CIP-006-3c | R1 | Medium | Moderate | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2015014715 | CIP-006-3c | R1 | Medium | Moderate | 7/15/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013811 | CIP-006-3c | R2 | Medium | Moderate | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013812 | CIP-006-3c | R3 | Medium | Moderate | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013809 | CIP-006-3c | R3 | Medium | Minimal | 7/30/2014 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013813 | CIP-006-3c | R4 | Medium | Minimal | 4/1/2013 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013814 | CIP-006-3c | R5 | Medium | Moderate | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013815 | CIP-006-3c | R6 | Lower | Minimal | 4/1/2013 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013834 | CIP-006-3c | R7 | Lower | Minimal | 1/1/2013 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013835 | CIP-006-3c | R8 | Medium | Minimal | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013820 | CIP-007-3a | R1 | Medium | Serious | 6/25/2014 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013821 | CIP-007-3a | R2 | Medium | Serious | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2015015243 | CIP-007-3a | R3 | Lower | Serious | 3/18/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013795 | CIP-007-3a | R3 | Lower | Serious | 4/30/2014 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013822 | CIP-007-3a | R4 | Medium | Serious | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013823 | CIP-007-3a | R5 | Lower | Serious | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014014469 | CIP-007-3a | R5.2.3 | Lower | Minimal | 3/30/2015 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|--------------------------|---|--|----------------------------|------------------------------------|
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013797 | CIP-007-3a | R5 | Lower | Minimal | 10/30/2014 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013816 | CIP-007-3a | R5 | Lower | Minimal | 8/30/2014 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013824 | CIP-007-3a | R6 | Lower | Serious | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013915 | CIP-007-3a | R7 | Lower | Moderate | 3/31/2013 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013825 | CIP-007-3a | R8 | Lower | Serious | 4/1/2015 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013836 | CIP-007-3a | R9 | Lower | Minimal | 3/31/2014 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013826 | CIP-008-3 | R1 | Lower | Moderate | 3/30/2013 | X |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$150,000 | RFC2014013827 | CIP-009-3 | R1 | Medium | Moderate | 3/30/2013 | X |
| 1/28/2016 | NP16-11-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$21,000 | FRCC2015015112 | CIP-006-3c | R2 | Medium | Minimal | 7/28/2015 | X |
| 1/28/2016 | NP16-11-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$21,000 | FRCC2015014923 | CIP-006-3c | R2; R2.2 | Medium | Moderate | 4/17/2015 | X |
| 1/28/2016 | NP16-11-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$21,000 | FRCC2015015059 | CIP-007-3a | R9 | Lower | Minimal | 5/29/2015 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002262 | CIP-002-1 | R1; R1.2; R1.2.2; R1.2.4 | Medium | Moderate | 5/9/2013 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002354 | CIP-002-1 | R3; R3.1 | High | Serious | 4/1/2014 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002355 | CIP-003-1 | R1; R1.1; R1.2; R1.3 | Medium | Moderate | 11/15/2010 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002356 | CIP-003-2 | R4.3 | Medium | Minimal | 4/25/2014 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2013011670 | CIP-003-3 | R5 | Lower | Minimal | 7/31/2013 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC200801173 | CIP-004-1 | R2 | Lower | Minimal | 5/15/2009 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC200801174 | CIP-004-1 | R3 | Medium | Minimal | 12/30/2009 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC200801175 | CIP-004-1 | R4 | Lower | Minimal | 5/15/2009 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002280 | CIP-004-1 | R3; R3.2 | Medium | Minimal | 1/20/2011 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2014014185 | CIP-004-3a | R3 | Medium | Minimal | 7/21/2014 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC200901633 | CIP-005-1 | R1; R1.5 | Lower | Minimal | 12/30/2009 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002381 | CIP-005-1 | R1 | Medium | Minimal | 6/25/2010 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002382 | CIP-005-1 | R2 | Medium | Minimal | 6/25/2010 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201102851 | CIP-005-1 | R1; R1.4 | Medium | Moderate | 5/15/2012 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2013013087 | CIP-005-3 | R3; R3.2 | Medium | Minimal | 8/14/2015 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC200901632 | CIP-005-1 | R1; R1.8 | Lower | Minimal | 12/30/2009 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002269 | CIP-006-1 | R1; R1.6 | Medium | Minimal | 11/9/2011 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002273 | CIP-006-1 | R4 | Lower | Minimal | 4/28/2011 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2015014618 | CIP-006-3c | R5 | Medium | Minimal | 12/16/2014 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2015014628 | CIP-007-1 | R2 | Medium | Moderate | 5/15/2015 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2015014629 | CIP-007-1 | R5 | Medium | Moderate | 5/15/2015 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC200801176 | CIP-007-1 | R1 | Medium | Minimal | 12/12/2008 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC200902261 | CIP-007-1 | R3; R3.1 | Lower | Moderate | 11/12/2010 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002260 | CIP-007-1 | R1; R1.1 | Medium | Moderate | 2/15/2013 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002279 | CIP-007-1 | R6; R6.4; R6.5 | Medium | Minimal | 7/27/2010 | X |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002412 | CIP-007-1 | R5; R5.2.2 | Lower | Minimal | 8/4/2011 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014245 | CIP-002-3 | R3 | High | Moderate | 5/4/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014014 | CIP-003-1 | R6 | Lower | Serious | 6/15/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014251 | CIP-004-3 | R2 | Medium | Moderate | 7/18/2014 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014252 | CIP-004-3 | R2.1 | Medium | Serious | 6/26/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014253 | CIP-004-3 | R3.3 | Lower | Moderate | 5/17/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2013013197 | CIP-004-3a | R4.2 | Lower | Moderate | 5/13/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014013447 | CIP-004-3a | R4.2 | Lower | Moderate | 5/13/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014013997 | CIP-004-3a | R4.2 | Lower | Moderate | 4/10/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014013623 | CIP-005-1 | R1.5 | Medium | Serious | 6/6/2014 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014207 | CIP-005-3 | R1.6 | Lower | Serious | 11/9/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014015 | CIP-005-3a | R1.5 | Medium | Minimal | 12/19/2014 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2015015300 | CIP-005-3a | R1 | Lower | Serious | 11/9/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014011 | CIP-006-1 | R1.1 | Medium | Moderate | 5/11/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014208 | CIP-006-3a | R1.8 | Lower | Moderate | 11/17/2014 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014209 | CIP-006-3a | R5 | Medium | Serious | 11/17/2014 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014410 | CIP-006-3c | R1 | Medium | Minimal | 10/5/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2015015143 | CIP-006-3c | R1 | Medium | Moderate | 10/19/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2013013198 | CIP-006-3c | R5 | Medium | Serious | 6/30/2014 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014013998 | CIP-007-1 | R2 | Medium | Serious | 11/4/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014013626 | CIP-007-1 | R3 | Lower | Serious | 1/15/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014216 | CIP-007-1 | R5.2; R5.2.3 | Lower | Serious | 3/17/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014211 | CIP-007-3a | R1.3 | Lower | Serious | 11/20/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014262 | CIP-007-3a | R3, R3.1, R3.2 | Lower | Serious | 7/14/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014114 | CIP-007-3a | R3.2 | Lower | Serious | 6/25/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014012 | CIP-007-3a | R4 | Medium | Minimal | 6/6/2014 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$1,700,000 | RFC2014014215 | CIP-007-3a | R5.1.2 | Lower | Minimal | 5/8/2015 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|------------------------------|---|--|----------------------------|------------------------------------|
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$1,700,000 | RFC2014014257 | CIP-007-3a | R5.3; R5.3.1, R5.3.2, R5.3.3 | Lower | Serious | 7/1/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$1,700,000 | RFC2014014238 | CIP-007-3a | R9 | Lower | Moderate | 4/8/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$1,700,000 | RFC2014014239 | CIP-008-3 | R1.6 | Lower | Moderate | 10/6/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$1,700,000 | RFC2014014013 | CIP-009-1 | R4 | Lower | Serious | 2/16/2016 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$1,700,000 | RFC2014014240 | CIP-009-3 | R1 | Medium | Serious | 6/22/2015 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$1,700,000 | RFC2014014241 | CIP-009-3 | R2 | Lower | Serious | 2/16/2016 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$1,700,000 | RFC2015015301 | CIP-009-3 | R2 | Lower | Serious | 2/16/2016 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$1,700,000 | RFC2015015302 | CIP-009-3 | R4 | Lower | Serious | 2/16/2016 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$1,700,000 | RFC2014014242 | CIP-009-3 | R5 | Lower | Serious | 2/16/2016 | X |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$1,700,000 | RFC2015015303 | CIP-009-3 | R5 | Lower | Serious | 2/16/2016 | X |
| 2/29/2016 | NP16-13-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2015014896 | CIP-002-1 | R3 | High | Minimal | 1/28/2016 | X |
| 2/29/2016 | NP16-13-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2015014898 | CIP-002-1 | R3 | High | Minimal | 1/28/2016 | X |
| 2/29/2016 | NP16-13-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2015014897 | CIP-002-3 | R4 | Lower | Minimal | 1/28/2016 | X |
| 2/29/2016 | NP16-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2015014651 | CIP-002-3 | R4 | Lower | Minimal | 2/17/2015 | X |
| 2/29/2016 | NP16-13-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2015014707 | CIP-003-1 | R2 | Medium | Minimal | 12/18/2015 | X |
| 2/29/2016 | NP16-13-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$0 | SERC2015014706 | CIP-003-1 | R2 | Medium | Minimal | 12/18/2015 | X |
| 2/29/2016 | NP16-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2013012867 | CIP-003-1 | R2 | Medium | Minimal | 9/5/2013 | X |
| 4/28/2016 | NP16-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2014013763 | CIP-003-3 | R5 | Lower | Minimal | 1/30/2015 | X |
| 4/28/2016 | NP16-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2014014186 | CIP-004-3a | R4 | Lower | Minimal | 6/15/2015 | X |
| 4/28/2016 | NP16-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2014013840 | CIP-005-1 | R1 | Medium | Minimal | 1/30/2015 | X |
| 4/28/2016 | NP16-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2014014535 | CIP-005-1 | R1 | Medium | Minimal | 1/30/2015 | X |
| 4/28/2016 | NP16-18-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | SERC2015014968 | CIP-005-1 | R3 | Medium | Moderate | 4/1/2016 | X |
| 4/28/2016 | NP16-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2014013760 | CIP-005-3a | R3 | Medium | Minimal | 6/29/2015 | X |
| 4/28/2016 | NP16-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2014013839 | CIP-005-3a | R5 | Lower | Minimal | 12/31/2014 | X |
| 4/28/2016 | NP16-18-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$20,000 | SERC2015014764 | CIP-005-3a | R2; R2.2 | Medium | Moderate | 5/19/2015 | X |
| 4/28/2016 | NP16-18-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$20,000 | SERC2015015166 | CIP-005-3a | R1; R1.5 | Medium | Minimal | 8/7/2015 | X |
| 4/28/2016 | NP16-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2014013759 | CIP-006-1 | R2; R2.2 | Medium | Minimal | 7/31/2015 | X |
| 4/28/2016 | NP16-18-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$20,000 | SERC2015014604 | CIP-006-1 | R1; R1.8 | Medium | Moderate | 12/31/2015 | X |
| 4/28/2016 | NP16-18-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | SERC2015014966 | CIP-006-1 | R1; R1.1 | Medium | Minimal | 4/1/2016 | X |
| 4/28/2016 | NP16-18-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | SERC2015014963 | CIP-006-1 | R1; R1.8 | Lower | Moderate | 4/1/2016 | X |
| 4/28/2016 | NP16-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2014014167 | CIP-006-3c | R1; R1.6 | Medium | Minimal | 12/19/2014 | X |
| 4/28/2016 | NP16-18-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$20,000 | SERC2015014635 | CIP-006-3c | R5 | Medium | Minimal | 6/5/2015 | X |
| 4/28/2016 | NP16-18-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$20,000 | SERC2015015165 | CIP-006-3c | R2; R2.2 | Medium | Minimal | 8/7/2015 | X |
| 4/28/2016 | NP16-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2014014094 | CIP-007-1 | R3; R3.1; R3.2 | Lower | Moderate | 6/5/2015 | X |
| 4/28/2016 | NP16-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2014013758 | CIP-007-3a | R1 | Medium | Minimal | 12/31/2014 | X |
| 4/28/2016 | NP16-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2014014172 | CIP-007-3a | R5 | Lower | Minimal | 1/27/2015 | X |
| 4/28/2016 | NP16-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2014013761 | CIP-007-3a | R6 | Lower | Minimal | 6/29/2015 | X |
| 4/28/2016 | NP16-18-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2014013757 | CIP-007-3a | R9 | Lower | Minimal | 12/31/2014 | X |
| 4/28/2016 | NP16-18-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$5,000 | SERC2015014708 | CIP-007-3a | R3; R3.1 | Lower | Moderate | 3/20/2015 | X |
| 4/28/2016 | NP16-18-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$20,000 | SERC2015014762 | CIP-007-3a | R3; R3.1 | Lower | Minimal | 8/14/2015 | X |
| 4/28/2016 | NP16-18-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$20,000 | SERC2015015167 | CIP-007-3a | R1; R1.3 | Lower | Moderate | 8/10/2015 | X |
| 4/28/2016 | NP16-18-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$20,000 | SERC2015015164 | CIP-009-1 | R1 | Medium | Moderate | 8/10/2015 | X |
| 4/28/2016 | NP16-18-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$45,000 | SERC2015014970 | CIP-009-3 | R1 | Medium | Moderate | 4/1/2016 | X |
| 5/31/2016 | NP16-20-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | FRCC2015015368 | CIP-005-3a | R1; R1.4 | Medium | Minimal | 12/23/2015 | X |
| 5/31/2016 | NP16-20-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | FRCC2015015366 | CIP-005-3a | R2 R2.2 | Medium | Moderate | 1/13/2016 | X |
| 5/31/2016 | NP16-20-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$35,000 | FRCC2015015369 | CIP-006-3c | R2; R2.2 | Medium | Minimal | 12/18/2015 | X |
| 6/29/2016 | NP16-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | SERC2015014761 | CIP-004-3 | R4 | Lower | Minimal | 4/29/2016 | X |
| 6/29/2016 | NP16-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | SERC2015015099 | CIP-005-3a | R1; R1.5 | Medium | Minimal | 4/29/2016 | X |
| 6/29/2016 | NP16-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | SERC2015015405 | CIP-005-3a | R2 | Medium | Minimal | 1/19/2016 | X |
| 6/29/2016 | NP16-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | SERC2015014643 | CIP-007-3a | R3 | Lower | Moderate | 4/29/2016 | X |
| 6/29/2016 | NP16-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | SERC2015015254 | CIP-007-3a | R1 | Medium | Moderate | 9/25/2015 | X |
| 6/29/2016 | NP16-21-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$65,000 | SERC2015015400 | CIP-007-3a | R5; R5.3.3 | Medium | Minimal | 1/19/2016 | X |
| 7/28/2016 | NP16-23-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | SERC2014013657 | CIP-002-3 | R3 | High | Minimal | 11/14/2014 | X |
| 7/28/2016 | NP16-23-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | SERC2014013877 | CIP-005-1 | R1 | Medium | Moderate | 3/11/2015 | X |
| 7/28/2016 | NP16-23-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | SERC2014013910 | CIP-005-3a | R4 | Medium | Minimal | 10/31/2013 | X |
| 7/28/2016 | NP16-23-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | SERC2014014396 | CIP-006-3c | R5 | Medium | Minimal | 9/8/2014 | X |
| 7/28/2016 | NP16-23-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | SERC2014014403 | CIP-006-3c | R8 | Medium | Minimal | 6/30/2015 | X |
| 7/28/2016 | NP16-23-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | SERC2014013881 | CIP-007-3a | R5 | Medium | Moderate | 12/31/2014 | X |
| 7/28/2016 | NP16-23-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | SERC2014014274 | CIP-007-3a | R5 | Medium | Minimal | 4/27/2015 | X |
| 7/28/2016 | NP16-23-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | SERC2014013438 | CIP-007-3a | R6 | Lower | Moderate | 3/1/2016 | X |
| 7/28/2016 | NP16-23-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | SERC2014013765 | CIP-007-3a | R6 | Lower | Minimal | 6/17/2014 | X |
| 7/28/2016 | NP16-23-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | SERC2014013767 | CIP-007-3a | R8 | Medium | Moderate | 12/15/2014 | X |
| 7/28/2016 | NP16-23-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$225,000 | SERC2014013766 | CIP-009-3 | R5 | Lower | Moderate | 4/9/2014 | X |
| 7/28/2016 | NP16-24-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$180,000 | SERC2014014337 | CIP-003-3 | R4 | Medium | Minimal | 4/21/2016 | X |
| 7/28/2016 | NP16-24-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$180,000 | SERC2014014336 | CIP-003-3 | R5 | Lower | Minimal | 2/11/2016 | X |
| 7/28/2016 | NP16-24-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$180,000 | SERC2014014086 | CIP-005-1 | R1 | Medium | Moderate | 12/31/2015 | X |
| 7/28/2016 | NP16-24-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$180,000 | SERC2014014427 | CIP-005-3 | R3 | Medium | Moderate | 3/9/2016 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|-----------------------------------|---|--|----------------------------|------------------------------------|
| 7/28/2016 | NP16-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$180,000 | SERC2014014196 | CIP-005-3a | R4 | Medium | Minimal | 3/9/2016 | X |
| 7/28/2016 | NP16-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$180,000 | SERC2014013621 | CIP-006-1 | R1 | Medium | Minimal | 9/9/2015 | X |
| 7/28/2016 | NP16-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$180,000 | SERC2014014195 | CIP-006-1 | R2 | Medium | Minimal | 12/30/2015 | X |
| 7/28/2016 | NP16-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$180,000 | SERC2014013444 | CIP-006-3c | R1 | Medium | Minimal | 9/23/2014 | X |
| 7/28/2016 | NP16-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$180,000 | SERC2014014198 | CIP-006-3c | R2 | Medium | Moderate | 4/28/2016 | X |
| 7/28/2016 | NP16-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$180,000 | SERC2014013437 | CIP-006-3c | R5 | Medium | Minimal | 9/8/2015 | X |
| 7/28/2016 | NP16-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$180,000 | SERC2014014395 | CIP-006-3c | R5 | Medium | Minimal | 4/4/2016 | X |
| 7/28/2016 | NP16-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$180,000 | SERC2014014423 | CIP-007-1 | R5 | Lower | Minimal | 4/4/2016 | X |
| 7/28/2016 | NP16-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$180,000 | SERC2014014087 | CIP-007-1 | R6 | Lower | Moderate | 1/28/2016 | X |
| 7/28/2016 | NP16-24-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$180,000 | SERC2014013619 | CIP-007-3a | R5 | Medium | Minimal | 12/2/2015 | X |
| 8/31/2016 | NP16-25-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | No Penalty | MRO2013012566 | CIP-002-1 | R1 | Medium | Minimal | 1/23/2014 | X |
| 8/31/2016 | NP16-25-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC200901720 | CIP-003-1 | R2 | Medium | Moderate | 7/22/2009 | X |
| 8/31/2016 | NP16-25-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | No Penalty | MRO2013012568 | CIP-005-1 | R4 | Medium | Minimal | 1/23/2014 | X |
| 8/31/2016 | NP16-25-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | No Penalty | MRO2013012572 | CIP-006-1 | R3 | Medium | Moderate | 6/6/2013 | X |
| 8/31/2016 | NP16-25-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$0 | WECC2014013472 | CIP-006-1 | R1; R1.7; R1.8 | Medium | Moderate | 11/20/2015 | X |
| 8/31/2016 | NP16-25-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | No Penalty | MRO2013012575 | CIP-007-1 | R8 | Lower | Minimal | 1/23/2014 | X |
| 8/31/2016 | NP16-25-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | No Penalty | MRO2013012574 | CIP-007-3a | R7 | Lower | Minimal | 8/22/2014 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014014352 | CIP-002-3 | R3 | High | Serious | 3/17/2015 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014013782 | CIP-003-3 | R6 | Lower | Serious | 1/30/2015 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014014353 | CIP-005-3a | R1 | Medium | Serious | 10/24/2014 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014013507 | CIP-005-3a | R2 | Medium | Serious | 12/5/2014 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014013783 | CIP-005-3a | R3 | Medium | Serious | 12/5/2015 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014014354 | CIP-005-3a | R4 | Medium | Serious | 10/30/2014 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014014355 | CIP-005-3a | R5 | Lower | Serious | 10/24/2014 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014014356 | CIP-006-3c | R1 | Medium | Serious | 1/28/2014 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014014357 | CIP-006-3c | R2 | Medium | Serious | 1/1/2014 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014014358 | CIP-006-3c | R3 | Medium | Serious | 12/20/2014 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014013785 | CIP-006-3c | R4 | Medium | Serious | 6/29/2014 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014013784 | CIP-006-3c | R5 | Medium | Serious | 6/29/2014 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014014359 | CIP-006-3c | R6 | Lower | Serious | 1/28/2014 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014014360 | CIP-007-3a | R1 | Medium | Serious | 2/27/2014 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014014361 | CIP-007-3a | R2 | Medium | Serious | 7/30/2014 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014014362 | CIP-007-3a | R3 | Lower | Serious | 10/8/2014 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014014363 | CIP-007-3a | R5 | Lower | Serious | 7/12/2013 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014014364 | CIP-007-3a | R6 | Lower | Serious | 10/30/2014 | X |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$1,125,000 | WECC2014014365 | CIP-007-3a | R8 | Lower | Serious | 12/5/2014 | X |
| 10/31/2016 | NP17-3-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | WECC2014013506 | CIP-002-3 | R4 | Lower | Moderate | 3/4/2014 | X |
| 10/31/2016 | NP17-3-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | WECC2014013873 | CIP-005-3a | R1 | Medium | Moderate | | X |
| 10/31/2016 | NP17-3-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | WECC2014014531 | CIP-006-3c | R2 | Medium | Moderate | 9/11/2015 | X |
| 10/31/2016 | NP17-3-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$250,000 | WECC2015014704 | CIP-007-3a | R8 | Medium | Moderate | 11/6/2015 | X |
| 10/31/2016 | NP17-4-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | NPCC2015014993 | CIP-005-3a | R1 | Medium | Minimal | 8/5/2015 | X |
| 10/31/2016 | NP17-4-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | NPCC2015014994 | CIP-005-3a | R2 | Medium | Minimal | 12/17/2014 | X |
| 10/31/2016 | NP17-4-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | NPCC2015014995 | CIP-005-3a | R1 | Medium | Minimal | 12/1/2014 | X |
| 10/31/2016 | NP17-4-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | NPCC2015014996 | CIP-005-3a | R1 | Medium | Minimal | 8/24/2015 | X |
| 10/31/2016 | NP17-4-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | NPCC2015015001 | CIP-005-3a | R5 | Lower | Minimal | 8/24/2015 | X |
| 10/31/2016 | NP17-4-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | NPCC2015015002 | CIP-005-3a | R4 | Medium | Minimal | 8/26/2015 | X |
| 10/31/2016 | NP17-4-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | NPCC2016015520 | CIP-006-3c | R2 | Medium | Minimal | 9/23/2015 | X |
| 10/31/2016 | NP17-4-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | NPCC2015014997 | CIP-007-3a | R3 | Lower | Minimal | 12/30/2015 | X |
| 10/31/2016 | NP17-4-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | NPCC2015014998 | CIP-007-3a | R8 | Lower | Minimal | 8/26/2015 | X |
| 10/31/2016 | NP17-4-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | NPCC2015014999 | CIP-007-3a | R6 | Lower | Minimal | 12/30/2015 | X |
| 10/31/2016 | NP17-4-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | NPCC2015015000 | CIP-007-3a | R5 | Lower | Minimal | 9/25/2015 | X |
| 10/31/2016 | NP17-4-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$75,000 | NPCC2016015812 | CIP-007-3a | R6 | Medium | Minimal | 11/23/2016 | X |
| 11/30/2016 | NP17-8-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$142,000 | MRO2015014792 | CIP-002-3 | R3 | High | Moderate | 8/12/2016 | X |
| 11/30/2016 | NP17-8-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$142,000 | MRO2015014793 | CIP-005-1 | R1 | Medium | Moderate | 8/12/2016 | X |
| 11/30/2016 | NP17-8-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$142,000 | MRO2015014794 | CIP-007-1 | R1.1; R1.3 R1.4; R1.5; R1.6 | Medium | Moderate | 8/12/2016 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002377 | CIP-003-1 | R5 | Lower | Moderate | 1/14/2011 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002208 | CIP-004-1 | R2 | Medium | Moderate | 11/6/2010 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002209 | CIP-004-1 | R3 | Medium | Moderate | 11/6/2010 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002210 | CIP-004-1 | R4 | Medium | Moderate | 11/6/2010 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2015014575 | CIP-004-3 | R2 | Lower | Moderate | 12/16/2014 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002218 | CIP-005-1 | R1 | Lower | Moderate | 3/31/2011 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002219 | CIP-005-1 | R2 | Lower | Moderate | 12/14/2011 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002220 | CIP-005-1 | R3 | Medium | Moderate | 3/31/2011 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002221 | CIP-005-1 | R4 | Lower | Moderate | 5/9/2012 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002222 | CIP-005-1 | R5 | Medium | Minimal | 1/3/2012 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002167 | CIP-006-1 | R2 | Medium | Moderate | 10/27/2014 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC201002205 | CIP-006-1 | R3 | Medium | Moderate | 12/1/2014 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------------------|---|--|----------------------------|------------------------------------|
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002206 | CIP-006-1 | R4 | Lower | Moderate | 12/5/2013 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002207 | CIP-006-1 | R5 | Lower | Minimal | 11/24/2014 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002211 | CIP-006-1 | R6 | Medium | Moderate | 2/10/2014 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002168 | CIP-007-1 | R1 | Medium | Moderate | 3/3/2012 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002204 | CIP-007-1 | R2 | Medium | Moderate | 2/24/2012 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002212 | CIP-007-1 | R3 | Lower | Moderate | 5/30/2011 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002223 | CIP-007-1 | R4 | Medium | Moderate | 5/30/2011 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002224 | CIP-007-1 | R5 | Medium | Moderate | 11/5/2012 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002225 | CIP-007-1 | R6 | Medium | Moderate | 4/30/2012 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002226 | CIP-007-1 | R7 | Lower | Moderate | 5/30/2011 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002227 | CIP-007-1 | R8 | Medium | Moderate | 11/11/2011 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002228 | CIP-007-1 | R9 | Lower | Minimal | 5/30/2011 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2014013600 | CIP-007-3a | R6 | Lower | Minimal | 12/1/2014 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2015015127 | CIP-007-3a | R6 | Medium | Minimal | 12/2/2015 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002213 | CIP-009-1 | R1 | Medium | Moderate | 4/28/2011 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002214 | CIP-009-1 | R2 | Lower | Minimal | 3/17/2011 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002215 | CIP-009-1 | R3 | Lower | Minimal | 1/1/2012 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002216 | CIP-009-1 | R4 | Lower | Minimal | 5/30/2011 | X |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002217 | CIP-009-1 | R5 | Lower | Minimal | 6/30/2011 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902111 | CIP-002-1 | R1 | Medium | Minimal | 2/4/2013 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902115 | CIP-002-1 | R3 | High | Moderate | 2/4/2013 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902116 | CIP-002-1 | R4 | Lower | Minimal | 2/4/2013 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902130 | CIP-004-1 | R4 | Medium | Moderate | 3/16/2012 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902133 | CIP-004-1 | R2 | Medium | Moderate | 3/16/2012 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902120 | CIP-005-1 | R1 | Medium | Moderate | 5/17/2012 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902121 | CIP-005-1 | R2 | Medium | Moderate | 5/17/2012 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902124 | CIP-005-1 | R4 | Medium | Moderate | 5/17/2012 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902132 | CIP-005-1 | R5 | Lower | Minimal | 5/17/2012 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2013012269 | CIP-005-3a | R3 | Medium | Moderate | 3/6/2013 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902125 | CIP-006-1 | R4 | Lower | Minimal | 3/20/2012 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902128 | CIP-006-1 | R3 | Medium | Minimal | 3/20/2012 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902129 | CIP-006-1 | R2 | Medium | Minimal | 3/20/2012 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902136 | CIP-006-1 | R6 | Medium | Moderate | 3/20/2012 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902289 | CIP-006-1 | R1 | Medium | Moderate | 3/20/2012 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2013011732 | CIP-006-3c | R4 | Medium | Minimal | 12/6/2012 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2013011733 | CIP-006-3c | R5 | Medium | Minimal | 12/14/2012 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2013011734 | CIP-006-3c | R6 | Lower | Minimal | 12/14/2012 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2013011735 | CIP-006-3c | R2 | Medium | Minimal | 10/21/2015 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902126 | CIP-007-1 | R3 | Lower | Moderate | 4/30/2015 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902127 | CIP-007-1 | R2 | Medium | Moderate | 4/30/2015 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902137 | CIP-007-1 | R1 | Medium | Minimal | 4/30/2015 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902140 | CIP-007-1 | R4 | Medium | Moderate | 10/21/2015 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902141 | CIP-007-1 | R5 | Medium | Moderate | 10/21/2015 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902146 | CIP-007-1 | R6 | Medium | Minimal | 10/21/2015 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902148 | CIP-007-1 | R8 | Medium | Moderate | 10/21/2015 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200902149 | CIP-007-1 | R9 | Lower | Minimal | 10/21/2015 | X |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2015015259 | CIP-007-3a | R6 | Medium | Minimal | 11/8/2015 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2012010260 | CIP-002-2 | R3 | High | Minimal | 4/11/2012 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200901710 | CIP-003-1 | R1; R1.1; R1.3 | Medium | Minimal | 9/1/2009 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200901795 | CIP-004-1 | R4 | Lower | Minimal | 3/19/2010 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200901711 | CIP-004-1 | R2 | Lower | Minimal | 9/1/2009 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200901712 | CIP-004-1 | R4; R4.1 | Lower | Minimal | 6/30/2009 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002235 | CIP-004-1 | R4; R4.1; R4.2 | Medium | Minimal | 8/23/2010 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | SERC2015015210 | CIP-005-3a | R1.5 | Medium | Moderate | 8/31/2015 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | SERC2016015560 | CIP-005-3a | R1.5 | Medium | Moderate | 7/1/2016 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2013012054 | CIP-006-1 | R1; R1.8 | Medium | Moderate | 8/1/2013 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2015014880 | CIP-006-1 | R3 | Medium | Moderate | 11/12/2014 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC2015015024 | CIP-006-3c | R1; R1.6 | Medium | Minimal | 8/21/2015 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$60,000 | WECC2016015456 | CIP-006-3c | R1; R1.6 | Medium | Minimal | 12/22/2015 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | SERC2015015209 | CIP-006-3c | R2.2 | Medium | Moderate | 8/31/2015 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$50,000 | SERC2016015561 | CIP-006-3c | R1.6.1 | Medium | Moderate | 9/8/2016 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200901796 | CIP-007-1 | R1 | Medium | Minimal | 3/30/2010 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201102961 | CIP-007-1 | R3; R3.1 | Lower | Minimal | 8/24/2011 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201102962 | CIP-007-1 | R5; R5.2.1; R5.2.3; R5.3.3 | Medium | Minimal | 3/23/2012 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201102963 | CIP-007-1 | R6; R6.1 | Medium | Minimal | 10/3/2011 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2014014018 | CIP-007-1 | R6; R6.5 | Lower | Minimal | 7/31/2014 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|---|---|--|----------------------------|------------------------------------|
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200901552 | CIP-007-1 | R1; R1.2; R1.3 | Medium | Minimal | 7/30/2009 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200901626 | CIP-007-1 | R4; R4.2 | Medium | Moderate | 11/19/2009 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200901645 | CIP-007-1 | R3; R3.1; R3.2 | Lower | Moderate | 10/27/2009 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC200901713 | CIP-007-1 | R1.1 | Medium | Minimal | 6/17/2010 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002237 | CIP-007-1 | R2 | Medium | Minimal | 2/2/2010 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002238 | CIP-007-1 | R3 | Lower | Minimal | 2/2/2010 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002239 | CIP-007-1 | R4 | Medium | Minimal | 2/2/2010 | X |
| 12/29/2016 | NP17-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2012009538 | CIP-007-1 | R5.2.1 | Medium | Minimal | 3/14/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002170 | CIP-003-1 | R4 | Medium | Moderate | 2/29/2016 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002171 | CIP-003-1 | R5 | Lower | Moderate | 5/31/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002198 | CIP-003-1 | R1 | Medium | Moderate | 8/31/2011 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002199 | CIP-003-1 | R3 | Lower | Moderate | 5/31/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002176 | CIP-004-1 | R1 | Lower | Moderate | 11/30/2011 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002177 | CIP-004-1 | R2 | Medium | Moderate | 11/30/2011 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002178 | CIP-004-1 | R3 | Medium | Moderate | 11/30/2011 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002179 | CIP-004-1 | R4 | Medium | Moderate | 11/30/2011 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002186 | CIP-005-1 | R1 | Medium | Moderate | 2/28/2013 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002187 | CIP-005-1 | R2 | Medium | Moderate | 2/28/2013 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002188 | CIP-005-1 | R3 | Medium | Moderate | 2/28/2013 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002189 | CIP-005-1 | R4 | Medium | Moderate | 12/14/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002190 | CIP-005-1 | R5 | Medium | Moderate | 1/31/2013 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002166 | CIP-006-1 | R5 | Medium | Moderate | 2/29/2016 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002169 | CIP-006-1 | R6 | Medium | Moderate | 2/29/2016 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002200 | CIP-006-1 | R1 | Medium | Moderate | 2/29/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002201 | CIP-006-1 | R2 | Medium | Moderate | 2/29/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002202 | CIP-006-1 | R3 | Medium | Moderate | 2/29/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002203 | CIP-006-1 | R4 | Medium | Moderate | 2/29/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002156 | CIP-007-1 | R1 | Medium | Moderate | 5/31/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002157 | CIP-007-1 | R2 | Medium | Moderate | 5/31/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002158 | CIP-007-1 | R3 | Lower | Moderate | 5/31/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002159 | CIP-007-1 | R4 | Medium | Moderate | 5/31/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002160 | CIP-007-1 | R5 | Medium | Moderate | 5/31/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002161 | CIP-007-1 | R6 | Medium | Moderate | 5/31/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002162 | CIP-007-1 | R7 | Lower | Moderate | 2/29/2016 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002163 | CIP-007-1 | R8 | Lower | Moderate | 5/31/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002164 | CIP-007-1 | R9 | Lower | Moderate | 5/31/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002173 | CIP-008-1 | R1 | Lower | Moderate | 2/29/2016 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002174 | CIP-008-1 | R2 | Lower | Moderate | 2/29/2016 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002180 | CIP-009-1 | R1 | Medium | Moderate | 5/31/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002181 | CIP-009-1 | R2 | Medium | Moderate | 5/31/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002182 | CIP-009-1 | R3 | Lower | Moderate | 5/31/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002183 | CIP-009-1 | R4 | Lower | Moderate | 5/31/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002184 | CIP-009-1 | R5 | Lower | Moderate | 5/31/2012 | X |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002172 | CIP-003-1 | R6 | Lower | Moderate | 5/31/2012 | X |
| 1/30/2017 | NP17-14-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC2015014872 | CIP-006-1 | R1.8 | Medium | Minimal | 7/1/2015 | X |
| 1/30/2017 | NP17-14-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$17,000 | WECC2015015404 | CIP-006-3c | R2; R2.2 | Lower | Minimal | 6/16/2016 | X |
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2013012260 | CIP-004-1 | R4 | Lower | Moderate | 5/15/2015 | X |
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2013013088 | CIP-005-1 | R4 | Medium | Minimal | 10/28/2015 | X |
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2014013903 | CIP-005-3a | R2; R2.1; R2.2; R2.3; R2.4; R2.5 | Medium | Moderate | 5/1/2016 | X |
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2014013904 | CIP-005-3a | R1; R1.1; R1.2; R1.3; R1.4; R1.5; R1.6 | Medium | Moderate | 8/21/2015 | X |
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2014013905 | CIP-005-3a | R3; R3.1; R3.2 | Medium | Moderate | 8/25/2015 | X |
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2014013906 | CIP-005-3a | R4; R4.1; R4.2; R4.3; R4.4; R4.5 | Medium | Moderate | 6/15/2016 | X |
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2014013907 | CIP-005-3a | R5; R5.1; R5.2; R5.3 | Lower | Moderate | 7/28/2016 | X |
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2014013893 | CIP-007-3a | R1; R1.1; R1.2; R1.3 | Medium | Moderate | 12/11/2014 | X |
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2014013894 | CIP-007-3a | R2; R2.1; R2.2; R2.3 | Medium | Moderate | 11/20/2014 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|--|---|--|----------------------------|------------------------------------|
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2014013895 | CIP-007-3a | R3; R3.1; R3.2 | Lower | Moderate | 8/26/2015 | X |
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2014013896 | CIP-007-3a | R4; R4.1; R4.2 | Medium | Moderate | 8/20/2015 | X |
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2014013898 | CIP-007-3a | R5; R5.1; R5.2; R5.3 | Lower | Moderate | 8/25/2015 | X |
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2014013899 | CIP-007-3a | R6; R6.1; R6.2; R6.3; R6.4; R6.5 | Medium | Moderate | 7/28/2015 | X |
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2014013900 | CIP-007-3a | R8; R8.1; R8.2; R8.3; R8.4 | Medium | Moderate | 11/8/2015 | X |
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2014013901 | CIP-007-3a | R9 | Lower | Moderate | 7/27/2016 | X |
| 2/28/2017 | NP17-16-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$34,000 | WECC2015015191 | CIP-007-3a | R5; R5.2; R5.2.1 | Medium | Minimal | 11/18/2015 | X |
| 4/27/2017 | NP17-21-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$201,000 | WECC2015015031 | CIP-004-1 | R3 | Lower | Moderate | 7/28/2015 | X |
| 4/27/2017 | NP17-21-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$201,000 | WECC2015014909 | CIP-006-3c | R2.2 | Medium | Moderate | 10/9/2015 | X |
| 4/27/2017 | NP17-22-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$87,000 | WECC2016016705 | CIP-003-3 | R1; R1.1 | Medium | Minimal | 7/14/2015 | X |
| 4/27/2017 | NP17-22-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$152,000 | MRO2014013713 | CIP-003-3 | R5; R5.1; R5.2; R5.3 | Lower | Minimal | 8/6/2014 | X |
| 4/27/2017 | NP17-22-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$152,000 | MRO2013013155 | CIP-003-3 | R6 | Lower | Moderate | 3/5/2014 | X |
| 4/27/2017 | NP17-22-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2015014836 | CIP-004-3a | R4 | Lower | Minimal | 4/30/2015 | X |
| 4/27/2017 | NP17-22-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2015014973 | CIP-004-3a | R4 | Lower | Minimal | 6/30/15 | X |
| 4/27/2017 | NP17-22-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$152,000 | MRO2013012800 | CIP-004-3a | R4; R4.1; R4.2 | Lower | Minimal | 10/16/2014 | X |
| 4/27/2017 | NP17-22-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$152,000 | MRO2013012366 | CIP-005-1 | R1; R1.3; R1.5 | Medium | Moderate | 8/27/2015 | X |
| 4/27/2017 | NP17-22-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$152,000 | MRO2014014472 | CIP-005-1 | R3; R3.2 | Medium | Moderate | 5/5/2015 | X |
| 4/27/2017 | NP17-22-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2015014832 | CIP-005-3a | R1 | Medium | Minimal | 4/15/2015 | X |
| 4/27/2017 | NP17-22-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$87,000 | WECC2015014903 | CIP-005-3a | R2; R2.1; R2.2 | Medium | Moderate | 7/14/2015 | X |
| 4/27/2017 | NP17-22-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2015014714 | CIP-006-1 | R1 | Medium | Moderate | 8/31/2015 | X |
| 4/27/2017 | NP17-22-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$26,000 | WECC2016015861 | CIP-006-3c | R2; R2.2 | Medium | Moderate | 1/22/2015 | X |
| 4/27/2017 | NP17-22-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$152,000 | MRO2014013361 | CIP-006-3c | R2; R2.2 | Medium | Moderate | 8/27/2015 | X |
| 4/27/2017 | NP17-22-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$152,000 | MRO2013013116 | CIP-006-3c | R6 | Lower | Minimal | 10/11/2013 | X |
| 4/27/2017 | NP17-22-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2015014775 | CIP-007-1 | R2 | Medium | Moderate | 3/18/2016 | X |
| 4/27/2017 | NP17-22-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2015015022 | CIP-007-1 | R3 | Lower | Moderate | 3/18/2016 | X |
| 4/27/2017 | NP17-22-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2015014837 | CIP-007-1 | R5 | Lower | Minimal | 7/30/2015 | X |
| 4/27/2017 | NP17-22-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$152,000 | MRO2013011986 | CIP-007-1 | R3; R3.1 | Lower | Minimal | 5/28/2014 | X |
| 4/27/2017 | NP17-22-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$152,000 | MRO2013013054 | CIP-007-1 | R5; R5.1; R5.1.2; R5.2; R5.2.2; R5.2.3; R5.3; R5.3.3 | Medium | Moderate | 3/25/2016 | X |
| 4/27/2017 | NP17-22-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$152,000 | MRO2013012127 | CIP-007-1 | R6; R6.1; R6.2; R6.3; R6.4; R6.5 | Medium | Moderate | 10/29/2013 | X |
| 4/27/2017 | NP17-22-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2015014834 | CIP-007-3a | R1 | Medium | Minimal | 5/6/2015 | X |
| 4/27/2017 | NP17-22-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2015014833 | CIP-007-3a | R5 | Lower | Minimal | 3/31/2015 | X |
| 4/27/2017 | NP17-22-000 | MRO | Unidentified Registered Entity | NCRXXXXX | \$152,000 | MRO2013012126 | CIP-007-3a | R4; R4.2 | Medium | Moderate | 8/28/2013 | X |
| 5/31/2017 | NP17-23-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$54,000 | WECC2016015819 | CIP-006-3c | R2; R2.2 | Medium | Minimal | 12/21/2016 | X |
| 6/29/2017 | NP17-24-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$74,000 | WECC2016016130 | CIP-006-3c | R2; R2.1; R2.2 | Medium | Minimal | 6/26/2017 | X |
| 6/29/2017 | NP17-24-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$150,000 | RFC2014013842 | CIP-007-3a | R3; R3.1 | Lower | Moderate | 12/12/2015 | X |
| 7/31/2017 | NP17-25-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2013013072 | CIP-005-3 | R2; R2.2; R2.4 | Medium | Moderate | 11/4/2015 | X |
| 7/31/2017 | NP17-26-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SPP2014014499 | CIP-003-3 | R2; R2.2 | Medium | Minimal | 11/10/2015 | X |
| 7/31/2017 | NP17-26-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SPP2014014500 | CIP-003-3 | R6 | Lower | Moderate | 7/5/2016 | X |
| 7/31/2017 | NP17-26-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SPP2014014513 | CIP-004-3a | R4 | Lower | Moderate | 2/18/2016 | X |
| 7/31/2017 | NP17-26-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SPP2014014514 | CIP-005-3a | R1; R1.5; R1.6 | Medium | Moderate | 7/1/2016 | X |
| 7/31/2017 | NP17-26-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SPP2014014501 | CIP-006-3c | R1; R1.6.1 | Medium | Moderate | 2/18/2016 | X |
| 7/31/2017 | NP17-26-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SPP2014014502 | CIP-006-3c | R2; R2.2 | Medium | Moderate | 6/28/2016 | X |
| 7/31/2017 | NP17-26-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SPP2014014505 | CIP-007-3a | R1; R1.1 | Lower | Moderate | 7/1/2016 | X |
| 7/31/2017 | NP17-26-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SPP2014014506 | CIP-007-3a | R2; R2.1; R2.2 | Medium | Moderate | 7/1/2016 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------------------|---|--|----------------------------|------------------------------------|
| 7/31/2017 | NP17-26-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SPP2014014507 | CIP-007-3a | R4; R4.1 | Medium | Moderate | 7/6/2016 | X |
| 7/31/2017 | NP17-26-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SPP2014014508 | CIP-007-3a | R5; R5.2; R5.2.2 | Lower | Moderate | 6/29/2016 | X |
| 7/31/2017 | NP17-26-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SPP2015015324 | CIP-007-3a | R6; R6.1; R6.4; R6.5 | Medium | Moderate | 7/6/2016 | X |
| 7/31/2017 | NP17-26-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SPP2014014510 | CIP-008-3 | R1; R1.6 | Lower | Moderate | 11/23/2015 | X |
| 7/31/2017 | NP17-26-000 | SPP RE | Unidentified Registered Entity | NCRXXXXX | \$250,000 | SPP2014014511 | CIP-009-3 | R2 | Lower | Moderate | 6/27/2016 | X |
| 8/31/2017 | NP17-28-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2016016053 | CIP-002-5.1 | R1 | High | Minimal | 1/31/2017 | X |
| 8/31/2017 | NP17-28-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2016015502 | CIP-004-3a | R4 | Lower | Minimal | 5/12/2016 | X |
| 8/31/2017 | NP17-28-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2016015537 | CIP-006-3c | R1 | Medium | Minimal | 3/9/2016 | X |
| 8/31/2017 | NP17-28-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2016015751 | CIP-006-3c | R1 | Medium | Minimal | 7/21/2016 | X |
| 8/31/2017 | NP17-28-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2016015594 | CIP-006-3c | R2 | Medium | Minimal | 3/18/2016 | X |
| 8/31/2017 | NP17-28-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2016015595 | CIP-006-3c | R5 | Medium | Minimal | 5/30/2016 | X |
| 8/31/2017 | NP17-28-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$25,000 | RFC2016016114 | CIP-006-6 | R1 | Medium | Minimal | 9/1/2016 | X |
| 9/28/2017 | NP17-29-000 | MRO | Unidentified Registered Entity | NCRXXXXX | No Penalty | MRO2016015511 | CIP-007-1 | R2 | Medium | Moderate | 10/16/2017 | X |
| 9/28/2017 | NP17-29-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC2017016847 | CIP-014-2 | R4; P4.1; P4.2; P4.3 | Medium | Moderate | 1/12/2017 | X |
| 9/28/2017 | NP17-29-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$55,000 | WECC2017016848 | CIP-014-2 | R5; P5.1; P5.2; P5.3; P5.4 | High | Moderate | 5/19/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012661 | CIP-002-3 | R3 | High | Serious | 12/19/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016015522 | CIP-002-3 | R4 | Lower | Moderate | 8/10/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012662 | CIP-003-3 | R1; R1.3 | Medium | Moderate | 9/6/2013 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012663 | CIP-003-3 | R6 | Lower | Moderate | 1/29/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012664 | CIP-004-3 | R2; R2.1 | Medium | Moderate | 11/18/2015 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012665 | CIP-004-3 | R3 | Medium | Moderate | 11/18/2015 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016016616 | CIP-004-3 | R3; R3.3 | Medium | Moderate | 4/6/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012666 | CIP-004-3 | R4 | Lower | Moderate | 12/6/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016015515 | CIP-004-3a | R3; R3.2 | Medium | Minimal | 12/16/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016015480 | CIP-004-3a | R4; R4.2 | Lower | Minimal | 2/9/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016016615 | CIP-004-6 | R5; R5.2 | Medium | Minimal | 4/6/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2017016813 | CIP-004-6 | R5; R5.4 | Medium | Minimal | 4/6/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012667 | CIP-005-3 | R1; R1.1; R1.5 | Medium | Serious | 1/14/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012668 | CIP-005-3 | R2; R2.2; R2.4 | Medium | Serious | 12/21/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012669 | CIP-005-3 | R4; R4.2; R4.3; R4.4 | Medium | Moderate | 1/14/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012670 | CIP-005-3 | R5; R5.1; R5.2 | Lower | Moderate | 7/5/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016016619 | CIP-005-3a | R1 | Medium | Moderate | 12/31/2018 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2017017849 | CIP-005-3a | R1; R1.1 | Medium | Moderate | 9/7/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016016620 | CIP-005-3a | R2; R2.2 | Medium | Moderate | 12/31/2018 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016015523 | CIP-005-3a | R5; R5.1 | Lower | Moderate | 8/10/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012671 | CIP-006-3a | R1; R1.2; R1.8 | Medium | Moderate | 6/27/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012678 | CIP-006-3a | R2 | Medium | Moderate | 12/12/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016015516 | CIP-006-3c | R1; R1.6 | Medium | Serious | 12/20/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016015524 | CIP-006-3c | R1; R1.8 | Lower | Moderate | 8/10/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016016603 | CIP-006-6 | R1; R1.3 | Medium | Moderate | 4/6/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016016606 | CIP-006-6 | R2; R2.1 | Medium | Minimal | 4/6/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016016611 | CIP-006-6 | R2; R2.2 | Medium | Minimal | 4/6/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2017017812 | CIP-006-6 | R2; R2.2 | Medium | Minimal | 9/7/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012681 | CIP-007-3a | R2; R2.1; R2.2; R2.3 | Medium | Moderate | 12/19/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012675 | CIP-007-3a | R3; R3.1; R3.2 | Lower | Serious | 12/31/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012676 | CIP-007-3a | R4; R4.1 | Medium | Minimal | 12/29/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012677 | CIP-007-3a | R5; R5.1.2; R5.3 | Lower | Moderate | 11/7/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012680 | CIP-007-3a | R6; R6.1 | Lower | Minimal | 11/7/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012679 | CIP-007-3a | R8; R8.2; R8.3 | Lower | Moderate | 1/14/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016015525 | CIP-007-3a | R9 | Lower | Moderate | 8/10/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2017017813 | CIP-007-3a | R6; R6.1 | Medium | Minimal | 9/25/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2017017854 | CIP-007-3a | R5; R5.2.1 | Lower | Moderate | 10/1/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016016607 | CIP-007-3a | R5; R5.3.3 | Lower | Moderate | 4/24/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2017017851 | CIP-007-6 | R2; R2.1 | Medium | Minimal | 10/31/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016016614 | CIP-007-6 | R2; R2.2 | Medium | Minimal | 4/24/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016016609 | CIP-007-6 | R2; R2.3 | Medium | Minimal | 2/17/2017 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------------------|---|--|----------------------------|------------------------------------|
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2017017811 | CIP-007-6 | R2; R2.4 | Medium | Moderate | 8/22/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016016605 | CIP-007-6 | R4; R4.4 | Medium | Minimal | 4/6/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016016608 | CIP-007-6 | R5; R5.5 | Medium | Minimal | 4/24/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016016610 | CIP-007-6 | R5; R5.7 | Medium | Minimal | 4/24/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2013012682 | CIP-009-3 | R1 | Medium | Moderate | 11/15/2016 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2017017850 | CIP-010-2 | R1; R1.1 | Medium | Minimal | 10/31/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016016612 | CIP-010-2 | R1; R1.3 | Medium | Moderate | 4/24/2017 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2017017852 | CIP-010-2 | R1; R1.5 | Medium | Moderate | 1/31/2018 | X |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$500,000 | SERC2016016613 | CIP-010-2 | R2; R2.1 | Medium | Moderate | 4/24/2017 | X |
| 10/31/2017 | NP18-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2015014941 | CIP-005-3a | R1 | Medium | Moderate | 6/9/2016 | X |
| 10/31/2017 | NP18-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC201002165 | CIP-006-1 | R1 | Medium | Moderate | 7/1/2016 | X |
| 10/31/2017 | NP18-2-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2015014926 | CIP-006-3c | R2 | Medium | Moderate | 7/1/2016 | X |
| 11/30/2017 | NP18-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$22,000 | WECC2017016930 | CIP-007-3a | R5; R5.2.3 | Lower | Minimal | 11/9/2016 | X |
| 11/30/2017 | NP18-4-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$22,000 | WECC2016016649 | CIP-007-6 | R2; Part 2.3 | Medium | Minimal | 4/19/2017 | X |
| 1/31/2018 | NP18-6-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | SERC2017016972 | CIP-005-5 | R1, P1.2, P1.3 | Medium | Moderate | 12/21/2017 | X |
| 1/31/2018 | NP18-6-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | SERC2016015879 | CIP-007-6 | R3; P3.1 | Medium | Minimal | 12/21/2017 | X |
| 1/31/2018 | NP18-6-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | SERC2016015880 | CIP-007-6 | R5, P5.7 | Medium | Moderate | 12/29/2017 | X |
| 1/31/2018 | NP18-6-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | SERC2016015881 | CIP-007-6 | R4, P4.2 | Medium | Moderate | 12/21/2017 | X |
| 1/31/2018 | NP18-6-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | SERC2016016040 | CIP-007-6 | R1; P1.1 | Medium | Moderate | 12/21/2017 | X |
| 1/31/2018 | NP18-6-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | SERC2016016500 | CIP-007-6 | R2, P2.2 | Medium | Moderate | 12/21/2017 | X |
| 1/31/2018 | NP18-6-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | SERC2016016501 | CIP-007-6 | R4, P4.2 | Medium | Minimal | 12/21/2017 | X |
| 1/31/2018 | NP18-6-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$33,000 | SERC2016015882 | CIP-010-2 | R1; P1.1, P1.2, P1.3, P1.4 | Medium | Moderate | 12/21/2017 | X |
| 2/28/2018 | NP18-7-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$2,700,000 | WECC2016016233 | CIP-003-3 | R4 | Medium | Serious | 12/15/2017 | X |
| 2/28/2018 | NP18-7-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$2,700,000 | WECC2016016234 | CIP-003-3 | R5 | Medium | Serious | 12/15/2017 | X |
| 3/29/2018 | NP18-9-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2016016443 | CIP-004-6 | R4 | Medium | Moderate | 3/30/2018 | X |
| 3/29/2018 | NP18-9-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2016016444 | CIP-004-6 | R5 | Medium | Minimal | 10/2/2017 | X |
| 3/29/2018 | NP18-9-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No penalty | WECC2014013531 | CIP-006-1 | R3 | Medium | Moderate | 7/15/2014 | X |
| 3/29/2018 | NP18-9-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2016016442 | CIP-006-3c | R1 | Medium | Minimal | 10/13/2016 | X |
| 3/29/2018 | NP18-9-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2016015808 | CIP-006-3c | R5 | Medium | Moderate | 7/24/2017 | X |
| 3/29/2018 | NP18-9-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No penalty | WECC2016015660 | CIP-006-3c | R1; R1.7 | Lower | Minimal | 6/30/2017 | X |
| 3/29/2018 | NP18-9-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2016016441 | CIP-007-3a | R2 | Medium | Minimal | 6/23/2015 | X |
| 3/29/2018 | NP18-9-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2016016438 | CIP-007-3a | R3 | Lower | Moderate | 9/21/2017 | X |
| 3/29/2018 | NP18-9-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$84,000 | WECC2016016131 | CIP-007-3a | R5; R5.1.2, R5.2.3, | Medium | Minimal | 1/12/2017 | X |
| 3/29/2018 | NP18-9-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$84,000 | WECC2016016687 | CIP-007-3a | R1; R1.1; R1.2; R1.3 | Lower | Minimal | 11/1/2016 | X |
| 3/29/2018 | NP18-9-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$84,000 | WECC2016016688 | CIP-007-3a | R7; R7.1 | Lower | Moderate | 11/1/2016 | X |
| 3/29/2018 | NP18-9-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2016016439 | CIP-007-6 | R4 | Medium | Moderate | 5/1/2017 | X |
| 3/29/2018 | NP18-9-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2016016440 | CIP-007-6 | R5 | Medium | Minimal | 9/19/2016 | X |
| 3/29/2018 | NP18-9-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2016016436 | CIP-010-2 | R1 | Medium | Moderate | 9/22/2017 | X |
| 3/29/2018 | NP18-9-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$0 | RFC2016016437 | CIP-010-2 | R2 | Medium | Minimal | 11/22/2016 | X |
| 4/30/2018 | NP18-10-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$45,000 | TRE2017018149 | CIP-007-3a | R1 | Medium | Moderate | 12/31/2018 | X |
| 4/30/2018 | NP18-10-000 | Texas RE | Unidentified Registered Entity | NCRXXXXX | \$45,000 | TRE2017017741 | CIP-010-2 | R1; P1.1 | Medium | Minimal | 1/1/2019 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015014936 | CIP-003-3 | R5 | Lower | Minimal | 3/31/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015692 | CIP-003-3 | R5 | Lower | Moderate | 12/9/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015313 | CIP-003-3 | R6 | Medium | Minimal | 3/1/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015717 | CIP-003-3 | R6 | Lower | Minimal | 10/15/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015008 | CIP-004-3a | R3 | Medium | Minimal | 2/1/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015009 | CIP-004-3a | R4 | Lower | Minimal | 3/31/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015402 | CIP-004-3a | R4 | Lower | Minimal | 4/1/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015716 | CIP-004-3a | R4 | Lower | Minimal | 3/9/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016016474 | CIP-005-3a | R1 | Medium | Moderate | 3/15/2017 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015314 | CIP-006-3c | R1 | Medium | Minimal | 3/14/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015844 | CIP-006-3c | R5 | Medium | Serious | 12/16/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015715 | CIP-007-3a | R1 | Medium | Minimal | 8/31/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015714 | CIP-007-3a | R2 | Medium | Moderate | 3/31/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015241 | CIP-007-3a | R3 | Lower | Minimal | 4/30/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015843 | CIP-007-3a | R3 | Lower | Minimal | 2/15/2017 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015538 | CIP-007-3a | R5 | Lower | Minimal | 2/12/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015713 | CIP-007-3a | R5 | Medium | Moderate | 12/26/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015752 | CIP-007-3a | R6 | Medium | Moderate | 12/16/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015107 | CIP-007-3a | R6 | Lower | Minimal | 3/1/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2017017565 | CIP-007-6 | R2 | High | Minimal | 10/31/2017 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2017017566 | CIP-007-6 | R5 | Medium | Minimal | 8/25/2017 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015312 | CIP-014-2 | R1 | High | Moderate | 3/1/2016 | X |
| 5/31/2018 | NP18-15-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2017016850 | CIP-004-6 | R5; Part 5.1 | Medium | Moderate | 12/26/2017 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|-----------------------------|---|--|----------------------------|------------------------------------|
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2016015884 | CIP-007-3a | R2 | Medium | Minimal | 8/19/2016 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2016015930 | CIP-007-3a | R3 | Lower | Minimal | 1/10/2017 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2015014717 | CIP-007-3a | R5 | Lower | Minimal | 1/21/2015 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2015014718 | CIP-007-3a | R5 | Lower | Minimal | 3/6/2015 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2016015885 | CIP-007-3a | R2 | Medium | Minimal | 7/13/2016 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2016015888 | CIP-007-3a | R2 | Medium | Minimal | 8/31/2016 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2016015933 | CIP-007-3a | R3 | Lower | Minimal | 1/31/2017 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2015014719 | CIP-007-3a | R6 | Lower | Minimal | 3/24/2016 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2016015886 | CIP-007-3a | R2 | Medium | Minimal | 8/7/2017 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2016015932 | CIP-007-3a | R3 | Lower | Minimal | 1/10/2017 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2015015328 | CIP-007-3a | R4 | Medium | Minimal | 2/26/2016 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2015014720 | CIP-007-3a | R5 | Lower | Minimal | 1/29/2016 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2015015071 | CIP-007-3a | R5 | Lower | Minimal | 6/2/2016 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2015015311 | CIP-007-3a | R6 | Lower | Minimal | 5/28/2015 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2016015887 | CIP-007-3a | R2 | Medium | Minimal | 8/19/2016 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2015014723 | CIP-007-3a | R3 | Lower | Minimal | 6/10/2015 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2016015934 | CIP-007-3a | R3 | Lower | Minimal | 2/6/2017 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2015014738 | CIP-007-3a | R5 | Lower | Minimal | 8/12/2015 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2015014722 | CIP-007-3a | R6 | Lower | Minimal | 2/22/2016 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2017016759 | CIP-007-6 | R4 | Medium | Minimal | 7/7/2017 | X |
| 6/28/2018 | NP18-16-000 | RF | Unidentified Registered Entity | NCRXXXXXX | \$0 | RFC2017016756 | CIP-007-6 | R4 | Medium | Minimal | 7/14/2017 | X |
| 7/31/2018 | NP18-21-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2017017974 | CIP-005-1 | R2, R2.4 | Medium | Minimal | 8/14/2017 | X |
| 7/31/2018 | NP18-21-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2017017706 | CIP-006-6 | R2, P2.2 | Medium | Minimal | 6/29/2017 | X |
| 7/31/2018 | NP18-21-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2016015839 | CIP-007-3a | R3 | Lower | Moderate | 5/15/2017 | X |
| 7/31/2018 | NP18-21-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2017018459 | CIP-007-6 | R2, P2.1, 2.2, 2.3, and 2.4 | High | Moderate | 11/15/2017 | X |
| 8/30/2018 | NP18-22-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2015015218 | CIP-005-3a | R1 | Medium | Serious | 9/29/2017 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$95,000 | SERC2016016635 | CIP-002-3 | R3 | High | Moderate | 7/18/2017 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$220,000 | SERC2016016029 | CIP-003-3 | R6 | Lower | Moderate | 2/23/2017 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$220,000 | SERC2016016030 | CIP-003-3 | R6 | Lower | Moderate | 3/2/2017 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$95,000 | SERC2015015285 | CIP-004-3a | R4, R4.1 | Lower | Moderate | 11/3/2016 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$220,000 | SERC2017018071 | CIP-004-6 | R4, P4.1 | Medium | Minimal | 12/18/2017 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$220,000 | SERC2017018072 | CIP-004-6 | R4, P4.1 | Medium | Minimal | 10/23/2017 | X |
| 8/30/2018 | NP18-25-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No penalty | WECC2017018618 | CIP-004-6 | R3, P3.5 | Medium | Minimal | 10/18/2017 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$95,000 | SERC2016015535 | CIP-005-3a | R2, R2.2 | Medium | Moderate | 8/22/2016 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$220,000 | SERC2016016337 | CIP-006-6 | R2, P2.2 | Medium | Minimal | 9/26/2016 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$95,000 | SERC2016016373 | CIP-006-6 | R2, R2.1 | Medium | Minimal | 8/15/2018 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$95,000 | SERC2016016497 | CIP-006-6 | R1, P1.2 | Medium | Minimal | 1/31/2018 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$220,000 | SERC2016016493 | CIP-007-6 | R2, P2.2 | Medium | Moderate | 6/5/2018 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$220,000 | SERC2016016697 | CIP-007-6 | R2, P2.2 | Medium | Minimal | 6/6/2017 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$220,000 | SERC2017017644 | CIP-007-6 | R2, P2.2 | Medium | Minimal | 5/19/2017 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$220,000 | SERC2017018690 | CIP-007-6 | R2, P2.1 | Medium | Minimal | 6/15/2018 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$220,000 | SERC2017017669 | CIP-007-6 | R2, P2.2 | Medium | Minimal | 5/19/2017 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$220,000 | SERC2017017235 | CIP-010-2 | R1 | Medium | Moderate | 7/19/2017 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$220,000 | SERC2017017284 | CIP-010-2 | R1, P1.1 | Medium | Moderate | 10/26/2017 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$220,000 | SERC2018019153 | CIP-010-2 | R4 | Medium | Moderate | 4/12/2018 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$220,000 | SERC2017018380 | CIP-010-2 | R1, P1.4 | Medium | Moderate | 10/18/2018 | X |
| 8/30/2018 | NP18-25-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | WECC2017017928 | CIP-010-2 | R1, P1.1.1, P1.1.4 | Medium | Moderate | 1/19/2018 | X |
| 8/30/2018 | NP18-25-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$45,000 | WECC2017017930 | CIP-010-2 | R2, P2.1 | Medium | Moderate | 1/19/2018 | X |
| 8/30/2018 | NP18-25-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$220,000 | SERC2017018379 | CIP-010-2 | R1, P1.4 | Medium | Moderate | 10/18/2017 | X |
| 9/27/2018 | NP18-26-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$0 | NPCC2017017596 | CIP-006-6 | R1, P1.6, P1.7 | Medium | Minimal | 12/19/2017 | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-002-5.1 | R1.2 | High | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-002-5.1 | R1.2 | High | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-002-5.1 | R1.2 | High | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-002-5.1 | R1.2 | High | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-003-3 | R4.2 | Lower | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-003-3 | R6 | Lower | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-003-3 | R6 | Lower | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-003-3 | R6 | Lower | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-003-3 | R6 | Lower | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-3a | R2.1 | Lower | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-3a | R3.2 | Lower | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-3a | R4.2 | Lower | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-3a | R4.2 | Lower | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-3a | R4.2 | Lower | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-3a | R4.2 | Lower | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-6 | R2, P2.2 | Lower | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-6 | R2, P2.3 | Lower | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-6 | R3, P3.5 | Medium | Minimal | Ongoing | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|----------------------|---|--|----------------------------|------------------------------------|
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-6 | R3; P3.5 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-6 | R4; P4.1 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-6 | R4; P4.1 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-6 | R4; P4.1 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-6 | R4; P4.2, P4.3, P4.4 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-6 | R5; P5.1 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-6 | R5; P5.1 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-6 | R5; P5.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-6 | R5; P5.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-6 | R5; P5.2 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-6 | R5; P5.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-004-6 | R5; P5.2, P5.3, P5.4 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-1 | R1.4 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-3a | R1.4 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-3a | R1.4 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-3a | R1.5 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-3a | R1.5 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-3a | R1.5 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-3a | R2.1, R2.2, R2.4 | Medium | Serious | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-3a | R2.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-3a | R2.5.3 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-5 | R1; P1.3 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-5 | R1; P1.3 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-5 | R1; P1.5 | Medium | Serious | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-5 | R1; P1.5 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-5 | R2; P2.1 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-5 | R2; P2.1 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-5 | R2; P2.1, P2.2, P2.3 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-005-5 | R2; P2.1, P2.2, P2.3 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-3c | R1.1 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-3c | R1.5 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-3c | R1.6 | Medium | Serious | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-3c | R1.6.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-3c | R2.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-3c | R2.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-3c | R4 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-3c | R5 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-3c | R5 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-3c | R5 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-3c | R5 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-6 | R1; P1.1 | Medium | Serious | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-6 | R1; P1.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-6 | R1; P1.4 | Medium | Serious | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-6 | R1; P1.8 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-6 | R2; P2.1 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-6 | R2; P2.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-6 | R2; P2.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-6 | R2; P2.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-6 | R2; P2.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-6 | R2; P2.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-6 | R2; P2.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-006-6 | R2; P2.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-3a | R1.1, R1.2, R1.3 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-3a | R1.1 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-3a | R1.1 | Medium | Serious | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-3a | R3.1 | Lower | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-3a | R3 | Lower | Serious | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-3a | R5.1 | Lower | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-3a | R5.2 | Lower | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-3a | R5.3 | Lower | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-3a | R5.2, R5.3 | Lower | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-3a | R5.2, R5.3 | Lower | Serious | Ongoing | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|--|---|--|----------------------------|------------------------------------|
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-3a | R6.2 | Lower | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-3a | R7.1 | Lower | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-3a | R8.4 | Lower | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-3a | R9 | Lower | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-6 | R1; P1.1 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-6 | R2; P2.2 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-6 | R2; P2.2 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-6 | R2; P2.2 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-6 | R2; P2.2 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-6 | R2; P2.3 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-6 | R3; P3.3 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-6 | R4; P4.1, P4.2, P4.3, P4.4 | Medium | Serious | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-6 | R4; P4.4 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-6 | R5; P5.1, P5.2, P5.3, P5.4, P5.5, P5.6, P5.7 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-6 | R5; P5.2 | Medium | Serious | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-007-6 | R5; P5.6 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-009-6 | R1; P1.1, P1.2, P1.3, P1.4, P1.5 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-009-6 | R2; P2.1, P2.2 | Lower | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-009-6 | R3; P3.1, P3.1.1, P3.1.2, P3.1.3, P3.2, P3.2.1, P3.2.2 | Lower | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R1; P1.1 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R1; P1.1.1 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R1; P1.1, P1.1.1, P1.1.4 | Medium | Serious | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R1; P1.1.4 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R1; P1.1.4 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R1; P1.1.5 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R1; P1.2 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R1; P1.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R1; P1.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R1; P1.4.1, P1.4.2 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R1; P1.4.1, P1.4.2 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R2; P2.1 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R2; P2.1 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R2; P2.1 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R2; P2.1 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R3; P3.3 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R3; P3.3 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R3; P3.1, P3.3, P3.4 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R4 | Medium | Serious | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-010-2 | R4 | Medium | Minimal | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-011-2 | R1; P1.2 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-011-2 | R1; P1.2 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-011-2 | R1; P1.2 | Medium | Serious | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-011-2 | R1; P1.1, P1.2 | Medium | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-011-2 | R2; P2.1, P2.2 | Lower | Moderate | Ongoing | X |
| 1/25/2019 | NP19-4-000 | XXXX | Unidentified Registered Entity | NCRXXXXXX | \$10,000,000 | XXXXXXXXXXXX | CIP-014-2 | R1 | High | Moderate | 8/25/2017 | X |
| 2/28/2019 | NP19-5-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$0 | FRCC2018019002 | CIP-007-6 | R2 | Medium | Moderate | 3/31/2018 | X |
| 2/28/2019 | NP19-5-000 | FRCC | Unidentified Registered Entity | NCRXXXXXX | \$0 | FRCC2018019016 | CIP-007-6 | R5 | Medium | Moderate | 6/1/2018 | X |
| 2/28/2019 | NP19-5-000 | MRO | Unidentified Registered Entity | NCRXXXXXX | \$0 | SPP2017018137 | CIP-008-3 | R1 | Lower | Minimal | 8/22/2018 | X |
| 3/28/2019 | NP19-6-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2016016686 | CIP-002-5.1 | R1; P1.2 | High | Minimal | 5/11/2017 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|-----------------------------|---|--|----------------------------|------------------------------------|
| 3/28/2019 | NP19-6-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$0 | WECC2017017206 | CIP-004-6 | R5; P5.1 | Medium | Moderate | 12/8/2017 | X |
| 3/28/2019 | NP19-6-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$0 | WECC2017017204 | CIP-004-6 | R4; P4.1, 4.2 | Medium | Moderate | 12/13/2017 | X |
| 3/28/2019 | NP19-6-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$0 | WECC2017016991 | CIP-007-6 | R2; P2.1, 2.2, 2.3 | Medium | Minimal | 8/2/2017 | X |
| 3/28/2019 | NP19-6-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$0 | WECC2017017207 | CIP-007-6 | R1; P1.1 | Medium | Minimal | 1/8/2018 | X |
| 3/28/2019 | NP19-6-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$0 | WECC2017017208 | CIP-010-2 | R1; P1.1, 1.2, 1.3, and 1.4 | Medium | Moderate | 1/22/2018 | X |
| 4/30/2019 | NP19-7-000 | WECC | Unidentified Registered Entity | NCRXXXXX | No Penalty | WECC2016016712 | CIP-006-3c | R2 | Medium | Serious | 11/15/2017 | X |
| 4/30/2019 | NP19-9-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$301,000 | FRCC2017017834 | CIP-004-6 | R4, 4.1 | Medium | Moderate | 1/30/2018 | X |
| 4/30/2019 | NP19-9-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$301,000 | FRCC2017017370 | CIP-004-6 | R4, 4.2 | Medium | Moderate | 1/30/2018 | X |
| 4/30/2019 | NP19-9-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$301,000 | FRCC2017017454 | CIP-004-6 | R5, 5.3 | Medium | Minimal | 2/15/2018 | X |
| 4/30/2019 | NP19-9-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$301,000 | FRCC2017017869 | CIP-007-6 | R1, 1.1 | Medium | Minimal | 3/30/2018 | X |
| 4/30/2019 | NP19-9-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$301,000 | FRCC2017017375 | CIP-007-6 | R2, 2.1, 2.2, 2.3 | Medium | Serious | 7/13/2018 | X |
| 4/30/2019 | NP19-9-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$301,000 | FRCC2017017833 | CIP-007-6 | R4, 4.1 | Medium | Moderate | 4/18/2018 | X |
| 4/30/2019 | NP19-9-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$301,000 | FRCC2017017857 | CIP-007-6 | R5, 5.7 | Medium | Moderate | 2/15/2018 | X |
| 4/30/2019 | NP19-9-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$301,000 | FRCC2017017376 | CIP-010-2 | R1, 1.1 | Medium | Moderate | 2/15/2018 | X |
| 4/30/2019 | NP19-9-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$301,000 | FRCC2017017835 | CIP-010-2 | R3, 3.3 | Medium | Moderate | 1/15/2018 | X |
| 4/30/2019 | NP19-9-000 | FRCC | Unidentified Registered Entity | NCRXXXXX | \$301,000 | FRCC2017017696 | CIP-011-2 | R1, 1.1 | Medium | Moderate | 2/15/2018 | X |
| 5/30/2019 | NP19-10-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-004-6 | R3, 3.4 | Medium | Minimal | 2/28/2018 | X |
| 5/30/2019 | NP19-10-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-004-6 | R4, 4.1 | Medium | Minimal | 3/5/2018 | X |
| 5/30/2019 | NP19-10-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-005-3a | R2, 2.1, 2.2 | Medium | Serious | 12/14/2015 | X |
| 5/30/2019 | NP19-10-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-005-5 | R1, 1.3 | Medium | Moderate | 9/18/2018 | X |
| 5/30/2019 | NP19-10-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-006-3c | R1, R1.6.1 | Medium | Minimal | 1/1/2018 | X |
| 5/30/2019 | NP19-10-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-006-6 | R1, 1.3 | Medium | Minimal | 10/10/2017 | X |
| 5/30/2019 | NP19-10-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-007-3a | R2 | Medium | Serious | 8/17/2018 | X |
| 5/30/2019 | NP19-10-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-007-3a | R3 | Lower | Serious | 9/28/2018 | X |
| 5/30/2019 | NP19-10-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-007-3a | R5, 5.2, 5.3, 5.7 | Lower | Serious | 12/31/2018 | X |
| 5/30/2019 | NP19-10-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-007-6 | R3 | Medium | Serious | 8/17/2018 | X |
| 5/30/2019 | NP19-10-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-007-6 | R4, 4.1 | Medium | Serious | 8/17/2018 | X |
| 5/30/2019 | NP19-10-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-010-2 | R2 | Medium | Minimal | 2/28/2018 | X |
| 5/30/2019 | NP19-10-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-011-2 | R1 | Medium | Moderate | 4/25/2018 | X |
| 5/30/2019 | NP19-11-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-004-6 | R3, 3.4 | Medium | Minimal | 2/28/2018 | X |
| 5/30/2019 | NP19-11-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-004-6 | R4, 4.1 | Medium | Minimal | 2/9/2018 | X |
| 5/30/2019 | NP19-11-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-005-5 | R1, 1.3 | Medium | Moderate | 9/18/2018 | X |
| 5/30/2019 | NP19-11-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-006-3c | R1, 6.1 | Medium | Minimal | 12/15/2017 | X |
| 5/30/2019 | NP19-11-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-006-6 | R1, 1.3 | Medium | Minimal | 10/10/2017 | X |
| 5/30/2019 | NP19-11-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-007-3a | R2 | Medium | Serious | 8/17/2018 | X |
| 5/30/2019 | NP19-11-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-007-3a | R3 | Lower | Serious | 8/17/2018 | X |
| 5/30/2019 | NP19-11-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-007-3a | R5 | Medium | Serious | 12/31/2018 | X |
| 5/30/2019 | NP19-11-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-007-6 | R3 | Medium | Serious | 8/17/2018 | X |
| 5/30/2019 | NP19-11-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-007-6 | R4 | Lower | Serious | 8/17/2018 | X |
| 5/30/2019 | NP19-11-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-010-2 | R2 | Medium | Minimal | 2/28/2018 | X |
| 5/30/2019 | NP19-11-000 | XXXX | Unidentified Registered Entity | NCRXXXXX | \$1,000,000 | XXXXXXXXXXXX | CIP-011-2 | R1 | Medium | Moderate | 4/25/2018 | X |
| 6/27/2019 | NP19-12-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$0 | NPCC2018020059 | CIP-002-5.1a | R1; 1.1., 1.2., 1.3 | High | Minimal | 12/14/2018 | X |
| 6/27/2019 | NP19-12-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$0 | NPCC2018020060 | CIP-002-5.1a | R2; 2.1., 2.2, 1.3 | Lower | Minimal | 12/14/2018 | X |
| 6/27/2019 | NP19-12-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$0 | NPCC2018020063 | CIP-002-5.1a | R1; 1.1., 1.2., 1.3 | High | Minimal | 12/14/2018 | X |
| 6/27/2019 | NP19-12-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$0 | NPCC2018020064 | CIP-002-5.1a | R2; 2.1., 2.2 | Lower | Minimal | 12/14/2018 | X |
| 6/27/2019 | NP19-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$87,000 | WECC2017018489 | CIP-003-2 | R4 | Medium | Moderate | 11/8/2017 | X |
| 6/27/2019 | NP19-12-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$0 | NPCC2018020061 | CIP-003-6 | R3 | Medium | Minimal | 12/14/2018 | X |
| 6/27/2019 | NP19-12-000 | NPCC | Unidentified Registered Entity | NCRXXXXX | \$0 | NPCC2018020062 | CIP-003-6 | R3 | Medium | Minimal | 12/14/2018 | X |
| 6/27/2019 | NP19-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$0 | WECC2017018752 | CIP-007-6 | R5; P5.5 | Medium | Minimal | 11/6/2017 | X |
| 6/27/2019 | NP19-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$0 | WECC2018019340 | CIP-007-6 | R2; P2 | Medium | Minimal | 8/14/2018 | X |
| 6/27/2019 | NP19-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$87,000 | WECC2017018732 | CIP-007-6 | R5 | Medium | Moderate | 8/15/2018 | X |
| 6/27/2019 | NP19-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$87,000 | WECC2017017229 | CIP-011-2 | R1 | Medium | Moderate | 3/1/2017 | X |
| 6/27/2019 | NP19-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$87,000 | WECC2018020044 | CIP-011-2 | R1 | Medium | Moderate | 12/19/2017 | X |
| 6/27/2019 | NP19-12-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$87,000 | WECC2018020045 | CIP-011-2 | R1 | Medium | Moderate | 12/19/2017 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$775,000 | SERC2016015954 | CIP-002-5.1 | R1 | High | Moderate | 4/19/2019 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$775,000 | SERC2017018136 | CIP-004-6 | R5 | Medium | Moderate | 9/15/2017 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$775,000 | SERC2017018279 | CIP-004-6 | R5 | Medium | Moderate | 9/22/2017 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$775,000 | SERC2017018774 | CIP-005-5 | R1 | Medium | Minimal | 12/18/2017 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$775,000 | SERC2016016548 | CIP-005-5 | R2 | Medium | Serious | 8/17/2018 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$775,000 | SERC2017017286 | CIP-006-6 | R1 | Medium | Moderate | 6/26/2018 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$775,000 | SERC2017018440 | CIP-006-6 | R2 | Medium | Moderate | 1/23/2018 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$775,000 | SERC2017018441 | CIP-006-6 | R2 | Medium | Moderate | 4/18/2019 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$775,000 | SERC2017016832 | CIP-007-3a | R5 | Medium | Serious | 2/8/2019 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXX | \$775,000 | SERC2016016492 | CIP-007-6 | R1 | Medium | Minimal | 1/19/2017 | X |

| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|------------------------------------|---|--|----------------------------|------------------------------------|
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$775,000 | SERC2017018467 | CIP-007-6 | R2 | Medium | Moderate | 10/11/2017 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$775,000 | SERC2017017236 | CIP-007-6 | R3 | Medium | Moderate | 7/10/2018 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$775,000 | SERC2017018246 | CIP-007-6 | R5 | Medium | Moderate | 7/12/2018 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$775,000 | SERC2018019200 | CIP-007-6 | R5 | Medium | Moderate | 7/23/2018 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$775,000 | SERC2017018548 | CIP-007-6 | R5 | Medium | Minimal | 12/6/2017 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$775,000 | SERC2016016339 | CIP-007-6 | R5 | Medium | Minimal | 10/26/2016 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$775,000 | SERC2016016321 | CIP-010-2 | R1 | Medium | Serious | 4/27/2018 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$775,000 | SERC2018019106 | CIP-010-2 | R1 | Medium | Moderate | 4/27/2018 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$775,000 | SERC2016016379 | CIP-011-2 | R1 | Medium | Minimal | 9/4/2018 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$775,000 | SERC2016016572 | CIP-011-2 | R1 | Medium | Moderate | 9/4/2018 | X |
| 6/27/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | NCRXXXXXX | \$775,000 | SERC2017017564 | CIP-011-2 | R1 | Medium | Moderate | 9/4/2018 | X |
| 7/31/2019 | NP19-15-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | NPCC2018020348 | CIP-002-5.1a | R2.1; R2.2 | Lower | Minimal | 9/4/2018 | X |
| 7/31/2019 | NP19-15-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | NPCC2018020347 | CIP-002-5.1a | R1.1; R1.2 | High | Minimal | 9/4/2018 | X |
| 7/31/2019 | NP19-15-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | NPCC2018020351 | CIP-003-6 | R3 | Medium | Minimal | 9/4/2018 | X |
| 7/31/2019 | NP19-15-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | NPCC2018020346 | CIP-003-6 | R2 | Lower | Minimal | 9/6/2018 | X |
| 7/31/2019 | NP19-15-000 | NPCC | Unidentified Registered Entity | NCRXXXXXX | \$10,000 | NPCC2018020350 | CIP-003-6 | R1.1; R1.2 | Medium | Minimal | 9/18/2018 | X |
| 7/31/2019 | NP19-15-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2018020039 | CIP-004-3a | R3 | Medium | Moderate | 5/3/2018 | X |
| 7/31/2019 | NP19-15-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$74,000 | WECC2017016941 | CIP-005-5 | R1; P1.5 | Medium | Moderate | 5/23/2018 | X |
| 7/31/2019 | NP19-15-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$74,000 | WECC2018019006 | CIP-005-5 | R1; P1.3 | Medium | Minimal | 4/4/2018 | X |
| 7/31/2019 | NP19-15-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$80,000 | WECC2017017885 | CIP-005-5 | R2; P3 | Medium | Moderate | 2/8/2019 | X |
| 7/31/2019 | NP19-15-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2018020282 | CIP-006-3c | R4 | Medium | Minimal | 5/15/2017 | X |
| 7/31/2019 | NP19-15-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$80,000 | WECC2017018174 | CIP-006-3c | R1; R1.1 | Medium | Minimal | 10/4/2018 | X |
| 7/31/2019 | NP19-15-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | No Penalty | WECC2016015862 | CIP-006-6 | R1; P1.1, 1.2, 1.3, and 1.4 | Medium | Moderate | 11/14/2017 | X |
| 7/31/2019 | NP19-15-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$74,000 | WECC2017016928 | CIP-007-6 | R2; P2.1, 2.2, 2.3 | Medium | Moderate | 12/19/2018 | X |
| 7/31/2019 | NP19-15-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$74,000 | WECC2017016940 | CIP-007-6 | R5; P5.5.1, P5.5.2 | Medium | Moderate | 10/19/2018 | X |
| 7/31/2019 | NP19-15-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$74,000 | WECC2017016938 | CIP-007-6 | R4; P4.2.2 | Medium | Moderate | 5/17/2018 | X |
| 7/31/2019 | NP19-15-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$74,000 | WECC2017016939 | CIP-007-6 | R3; P3.1 | Medium | Minimal | 4/10/2018 | X |
| 7/31/2019 | NP19-15-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$74,000 | WECC2017016929 | CIP-010-2 | R1.3 | Medium | Moderate | 6/5/2018 | X |
| 7/31/2019 | NP19-15-000 | WECC | Unidentified Registered Entity | NCRXXXXXX | \$74,000 | WECC2017016926 | CIP-010-2 | R1; P1.1.1, P1.1.2, P1.1.4, P1.1.5 | Medium | Moderate | 3/29/2019 | X |

Exhibit 103

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

Plaintiff's December 18, 2018 FOIA Request and January 4, 2019 amendment.

Michael Mabee
8 Westgate Road
Mont Vernon, NH 03057
(516) 808-0883
CivilDefenseBook@gmail.com

REQUEST AMENDED - January 4, 2019

Track 3

NEW DUE DATE: February 4, 2019

December 18, 2018

Leonard Tao,
Director and Chief FOIA Officer
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Subject: Request under the Freedom of Information Act (FOIA), 5 U.S.C. § 552.

Dear Mr. Tao:

I request records under the Freedom of Information Act, which are described below. Further, as more fully set forth below, I also request a fee waiver as I have no commercial interest in the described records and it is in the public interest for the Federal Energy Regulatory Commission (FERC) to disclose these records to the public.

Description of records sought:

I seek the "NERC Full Notice of Penalty" version which includes the name of the registered entity (and which has been previously withheld from the public) for the following docket numbers:

| Date | FERC Docket Number | Region | Registered Entity | Entities |
|------------|--------------------|----------|----------------------------------|----------|
| 1/30/2014 | NP14-29-000 | WECC | Unidentified Registered Entity | 1 |
| 1/30/2014 | NP14-30-000 | RFC | Unidentified Registered Entity | 1 |
| 2/27/2014 | NP14-32-000 | SPP RE | Unidentified Registered Entity | 1 |
| 3/31/2014 | NP14-37-000 | WECC | Unidentified Registered Entity | 1 |
| 4/30/2014 | NP14-39-000 | WECC | Unidentified Registered Entity | 1 |
| 5/29/2014 | NP14-41-000 | WECC | Unidentified Registered Entity | 1 |
| 5/29/2014 | NP14-42-000 | SERC | Unidentified Registered Entity | 1 |
| 7/31/2014 | NP14-45-000 | WECC | Unidentified Registered Entity | 1 |
| 7/31/2014 | NP14-46-000 | RFC | Unidentified Registered Entities | 7 |
| 8/27/2014 | NP14-48-000 | RFC/NPCC | Unidentified Registered Entities | 3 |
| 10/30/2014 | NP15-5-000 | SPP | Unidentified Registered Entity | 1 |
| 10/30/2014 | NP15-6-000 | TRE | Unidentified Registered Entity | 1 |
| 11/25/2014 | NP15-10-000 | WECC | Unidentified Registered Entity | 1 |
| 11/25/2014 | NP15-11-000 | RFC | Unidentified Registered Entity | 1 |
| 11/25/2014 | NP15-9-000 | MRO | Unidentified Registered Entity | 1 |
| 12/30/2014 | NP15-13-000 | RFC | Unidentified Registered Entity | 1 |
| 12/30/2014 | NP15-15-000 | SERC | Unidentified Registered Entity | 1 |
| 12/30/2014 | NP15-17-000 | WECC | Unidentified Registered Entity | 1 |

| Date | FERC Docket Number | Region | Registered Entity | Entities |
|------------|--------------------|------------|----------------------------------|----------|
| 2/26/2015 | NP15-20-000 | SERC | Unidentified Registered Entity | 1 |
| 3/31/2015 | NP15-23-000 | WECC | Unidentified Registered Entities | 3 |
| 4/30/2015 | NP15-24-000 | RFC | Unidentified Registered Entity | 1 |
| 4/30/2015 | NP15-26-000 | RFC | Unidentified Registered Entity | 1 |
| 8/31/2015 | NP15-33-000 | RFC | Unidentified Registered Entity | 1 |
| 10/29/2015 | NP16-2-000 | WECC | Unidentified Registered Entity | 1 |
| 12/1/2015 | NP16-4-000 | WECC | Unidentified Registered Entity | 1 |
| 12/1/2015 | NP16-5-000 | WECC | Unidentified Registered Entity | 1 |
| 12/30/2015 | NP16-7-000 | SPP | Unidentified Registered Entity | 1 |
| 1/28/2016 | NP16-10-000 | RF | Unidentified Registered Entity | 1 |
| 1/28/2016 | NP16-9-000 | WECC | Unidentified Registered Entity | 1 |
| 2/29/2016 | NP16-12-000 | RF | Unidentified Registered Entity | 1 |
| 4/28/2016 | NP16-18-000 | RF / SERC | Unidentified Registered Entities | 5 |
| 5/31/2016 | NP16-20-000 | FRCC | Unidentified Registered Entity | 1 |
| 7/28/2016 | NP16-23-000 | SERC | Unidentified Registered Entity | 1 |
| 7/28/2016 | NP16-24-000 | SERC | Unidentified Registered Entity | 1 |
| 10/31/2016 | NP17-2-000 | WECC | Unidentified Registered Entity | 1 |
| 10/31/2016 | NP17-3-000 | WECC | Unidentified Registered Entity | 1 |
| 11/30/2016 | NP17-8-000 | MRO | Unidentified Registered Entity | 1 |
| 12/29/2016 | NP17-10-000 | WECC | Unidentified Registered Entity | 1 |
| 12/29/2016 | NP17-11-000 | WECC | Unidentified Registered Entity | 1 |
| 12/29/2016 | NP17-12-000 | WECC /SERC | Unidentified Registered Entities | 4 |
| 12/29/2016 | NP17-13-000 | WECC | Unidentified Registered Entity | 1 |
| 4/27/2017 | NP17-21-000 | WECC | Unidentified Registered Entity | 1 |
| 7/31/2017 | NP17-25-000 | WECC | Unidentified Registered Entity | 1 |
| 7/31/2017 | NP17-26-000 | SPP RE | Unidentified Registered Entity | 1 |
| 9/28/2017 | NP17-31-000 | SERC | Unidentified Registered Entity | 1 |
| 10/31/2017 | NP18-2-000 | WECC | Unidentified Registered Entities | 2 |
| 2/28/2018 | NP18-7-000 | WECC | Unidentified Registered Entity | 1 |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | 1 |
| 5/31/2018 | NP18-15-000 | WECC | Unidentified Registered Entity | 1 |
| 7/31/2018 | NP18-21-000 | WECC | Unidentified Registered Entity | 1 |
| 8/30/2018 | NP18-22-000 | WECC | Unidentified Registered Entity | 1 |
| 9/27/2018 | NP18-26-000 | NPCC | Unidentified Registered Entity | 1 |

In the instances where there was a “Spreadsheet NOP” I request a copy of the spreadsheet that lists the name(s) of the entity subject to the regulatory action. There is a total of 52 docket numbers covered under this request, with a total of 70 “Unidentified Registered Entities.”

The records sought are not Critical Energy Infrastructure Information (CEII) or otherwise classified to protect national security:

I note that FERC Order No. 833 holds that the Commission’s practice is that information that “simply give[s] the general location of the critical infrastructure” or simply provides the name of the facility is not Critical Energy

Infrastructure Information (CEII).¹ I am not seeking any CEII. I simply ask for disclosure of the identities of the “Unidentified Registered Entities” in the above dockets.

There is no national security reason or FOIA exemption that should prevent disclosure of the identity of this violator of reliability standards to the public, because the NERC Notice of Penalty claims that the cybersecurity vulnerabilities have been remedied.

Mere disclosure of the identity of the violating entity, without disclosure of the details of any remedied cybersecurity violations, will not provide adversaries information of any value but instead will likely reduce future violations. Disclosure of the identity of violators will prompt other utilities to be more diligent in order to avoid adverse publicity. The possibility of public shaming is a key component of the mandatory system of electric reliability standards established by Congress under Section 215 of the Federal Power Act and further codified in the Code of Federal Regulations. For example, when a utility has caused a blackout, FERC has had no issue in identifying the offending utilities and the amount of the fines. Would it not be better to identify reliability standard violators and therefore avoid blackouts?

I lastly note that the public has already been forced to wait years for this information in some instances, allowing electric utilities to hide behavior that causes profound risk to the public interest.

Under FERC’s regulations, the names of the entities must be disclosed:

18 CFR § 39.7 (b)(4) provides that: “Each violation or alleged violation shall be treated as nonpublic until the matter is filed with the Commission as a notice of penalty or resolved by an admission that the user, owner or operator of the Bulk-Power System violated a Reliability Standard or by a settlement or other negotiated disposition.” [Emphasis added.]

Further, 18 CFR § 39.7(d)(1) provides that a notice of penalty by the Electric Reliability Organization shall consist of, *inter alia*: “The name of the entity on whom the penalty is imposed.”

The regulations are very clear that the name of the entity on whom the penalty is imposed is to be disclosed. Yet, somehow this is not the practice at NERC and the records I am requesting have had the names of the registered entities hidden from the public.

The records sought would not reveal trade secrets and commercial or financial information obtained from a person and privileged or confidential:

I note that it has been practice for FERC and NERC to disclose the identities of some entities who have been subject to regulatory fines by NERC. Therefore, those entities violating reliability standards have not been considered privileged or confidential information, solely on the basis of being a violator.

I also note that it is inconsistent with a well-functioning democracy for monetary penalties to be assessed against regulated entities whose identities are then held as secrets. I urge the Commission to reconsider the implications of allowing NERC, the FERC-designated Electric Reliability Organization (ERO), to have delegated authority to assess fines for wrongdoing and then to keep the identities of wrongdoers from public view. I know of no other federal regulator that allows this odious practice.

¹ Order No. 833 at pg. 17. Also see 18 C.F.R. §388.113(c)(1)(iv).

Request for Waiver of Fees:

I am a private citizen with expertise in emergency preparedness and critical infrastructure protection. I maintain a blog where I intend to disseminate this information². I accept no advertising on my blog and derive no revenue from writing or posting my blog articles.

As set forth fully below, I am entitled to a waiver of fees as I meet all the requirements of 18 C.F.R. §388.109(c).

Requirement: In accordance with 18 C.F.R. §388.109(c)(1), “(1) Any fee described in this section may be reduced or waived if the requester demonstrates that disclosure of the information sought is: (i) In the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government, and (ii) Not primarily in the commercial interest of the requester.”

Answer: Disclosure of this information will inform the public as to the actions the government and the designated ERO have taken to insure the security of the bulk power system. There has been a great deal of media attention and government notices regarding recent cyberattacks and cybersecurity breaches to the electric grid.³ Disclosure of the requested information is critical to the public’s understanding of how FERC and the ERO holds regulated entities accountable to compliance with regulatory standards for cybersecurity.

I have no commercial interest in these records and will use these records in research and information dissemination to the public.

Requirement: In accordance with 18 C.F.R. §388.109(c)(2) “The Commission will consider the following criteria to determine the public interest standard:”

Answer: I will answer each criterion in turn.

Criterion: (i) “Whether the subject of the requested records concerns the operations or activities of the government”

Answer: The protection of the critical infrastructure, including the bulk power system, is a clear function of the federal government.⁴ The regulation of the critical infrastructures by the federal government and the transparency of the process – including the identities of entities that violate reliability standards– concerns the operations or activities of the government.

² <https://michaelmabee.info/category/mikes-blog/> (accessed April 13, 2018).

³ See for example: US-CERT Alert (TA18-074A) <https://www.us-cert.gov/ncas/alerts/TA18-074A> (accessed March 15, 2018); Gizmodo: “FBI and DHS Warn That Russia Has Been Poking at Our Energy Grid.” <https://apple.news/AHv5RwYqbSf-El-yla355Jw> (accessed March 15, 2018); Washington Free Beacon: “Russia Implicated in Ongoing Hack on U.S. Grid.” <https://apple.news/AGs6ieh6wSP-1tQkUFttREA> (accessed March 15, 2018); Slate: “What Does It Mean to Hack an Electrical Grid?” <https://apple.news/Au5gy7bTITDSovpvzg5j79w>

⁴ Executive Order 13800 “Strengthening the Cybersecurity of Federal Networks and Critical Infrastructure.” May 11, 2017. <https://www.gpo.gov/fdsys/pkg/FR-2017-05-16/pdf/2017-10004.pdf> (accessed March 24, 2018); Presidential Policy Directive 21 (PPD-21) – Critical Infrastructure Security and Resilience. February 12, 2013. <https://obamawhitehouse.archives.gov/the-press-office/2013/02/12/presidential-policy-directive-critical-infrastructure-security-and-resil> (accessed March 24, 2018).

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Criterion: (ii) "Whether the disclosure is likely to contribute to an understanding of government operations or activities"

Answer: According to NERC, "These violations posed a serious or substantial risk to the reliability of the bulk power system (BPS)." The entity in question risked the reliable operation of the bulk power system and therefore the public has a right to examine this incident and the behavior and actions of the violating entity.

Criterion: (iii) "Whether disclosure of the requested information will contribute to public understanding"

Answer: As previously noted, there has been a great deal of public attention, press articles and increased awareness to the threat of cyberattacks against the bulk power system. The identity of entities that place the public at risk by violating cybersecurity standards is critical to the public understanding of the effectiveness of existing standards.

Criterion: (iv) "Whether the disclosure is likely to contribute significantly to public understanding of government operations or facilities."

Answer: Under Section 215 of the Federal Power Act, regulation of the bulk power system is clearly a government operation. The public needs to understand how reliability standards are being enforced.

Requirement: In accordance with 18 C.F.R. §388.109(c)(3) "The Commission will consider the following criteria to determine the commercial interest of the requester:"

Answer: I will answer each criterion in turn.

Criterion: (i) Whether the requester has a commercial interest that would be furthered by the requested disclosure.

Answer: No. The requester a private citizen and has no commercial interest in the information.

And, if so: criterion: (ii) Whether the magnitude of the identified commercial interest of the requester is sufficiently large, in comparison with the public interest in disclosure, that disclosure is primarily in the commercial interest of the requester.

Answer: Not applicable since the requester has no commercial interest in the information.

The records may be provided to me electronically at this email address: CivilDefenseBook@gmail.com.

Sincerely,



Michael Mabee

Michael Mabee
8 Westgate Road
Mont Vernon, NH 03057
(516) 808-0883
CivilDefenseBook@gmail.com

January 4, 2019

Leonard Tao,
Director and Chief FOIA Officer
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Subject: Amendment to Freedom of Information Act (FOIA) Request #FOIA-2019-0019

Dear Mr. Tao:

Regarding my FOIA request dated December 18, 2018 (#FOIA-2019-0019 – copy attached for reference), I request records from one additional docket which I inadvertently omitted from my original request:

| Date | FERC Docket Number | Region | Registered Entity | Entities |
|------------|--------------------|----------|----------------------------------|----------|
| 12/30/2014 | NP15-18-000 | Multiple | Unidentified Registered Entities | 10 |

Updated description of records sought:

I seek the “NERC Full Notice of Penalty” version which includes the name of the registered entity (and which has been previously withheld from the public). In the instances where there was a “Spreadsheet NOP” I request a copy of the spreadsheet that lists the name(s) of the entity subject to the regulatory action. Between my original December 18, 2018 request and this amendment, there are a total of 53 docket numbers covered under this request, with a total of 81 “Unidentified Registered Entities.”

Sincerely,



Michael Mabee

Exhibit 104

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

Plaintiff's January 12, 2019 FOIA Request.

Michael Mabee
8 Westgate Road
Mont Vernon, NH 03057
(516) 808-0883
CivilDefenseBook@gmail.com

Accepted: January 16, 2019
(Similar to FOIA-2019-19)
Track 3
Due Date: February 14, 2019

January 12, 2019

Leonard Tao,
Director and Chief FOIA Officer
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Subject: Request under the Freedom of Information Act (FOIA), 5 U.S.C. § 552.

Dear Mr. Tao:

I request records under the Freedom of Information Act, which are described below.¹ Further, as more fully set forth below, I also request a fee waiver as I have no commercial interest in the described records and it is in the public interest for the Federal Energy Regulatory Commission (FERC) to disclose these records to the public.

Description of records sought:

I seek the "NERC Notice of Penalty" version which includes the name of the registered entity (and which has been previously withheld from the public) for the following docket numbers:

| Date | FERC Docket Number | Region | Registered Entity | Entities |
|-----------|--------------------|--------|--------------------------------|----------|
| 7/6/2010 | NP10-140-000 | RFC | Unidentified Registered Entity | 1 |
| 7/6/2010 | NP10-139-000 | WECC | Unidentified Registered Entity | 1 |
| 7/6/2010 | NP10-138-000 | RFC | Unidentified Registered Entity | 1 |
| 7/6/2010 | NP10-137-000 | WECC | Unidentified Registered Entity | 1 |
| 7/6/2010 | NP10-136-000 | WECC | Unidentified Registered Entity | 1 |
| 7/6/2010 | NP10-135-000 | WECC | Unidentified Registered Entity | 1 |
| 7/6/2010 | NP10-134-000 | SPP | Unidentified Registered Entity | 1 |
| 7/6/2010 | NP10-131-000 | SERC | Unidentified Registered Entity | 1 |
| 7/6/2010 | NP10-130-000 | SERC | Unidentified Registered Entity | 1 |
| 7/30/2010 | NP10-159-000 | WECC | Unidentified Registered Entity | 1 |
| 9/13/2010 | NP10-160-000 | WECC | Unidentified Registered Entity | 1 |
| 10/7/2010 | NP11-5-000 | SERC | Unidentified Registered Entity | 1 |
| 10/7/2010 | NP11-4-000 | FRCC | Unidentified Registered Entity | 1 |
| 10/7/2010 | NP11-3-000 | SERC | Unidentified Registered Entity | 1 |
| 10/7/2010 | NP11-2-000 | WECC | Unidentified Registered Entity | 1 |
| 10/7/2010 | NP11-1-000 | WECC | Unidentified Registered Entity | 1 |

¹ This is a new request. I submitted a previous request for a different set of records on December 17, 2018 (FOIA-2019-0019)

| Date | FERC Docket Number | Region | Registered Entity | Entities |
|------------|--------------------|------------|------------------------------------|----------|
| 11/5/2010 | NP11-22-000 | SERC | Unidentified Registered Entity | 1 |
| 11/5/2010 | NP11-21-000 | RFC | Unidentified Registered Entity | 1 |
| 11/30/2010 | NP11-56-000 | SERC | Unidentified Registered Entity | 1 |
| 11/30/2010 | NP11-47-000 | SERC | Unidentified Registered Entity | 1 |
| 12/22/2010 | NP11-81-000 | MRO, SPP | Unidentified Registered Entities 2 | 2 |
| 12/22/2010 | NP11-79-000 | FRCC | Unidentified Registered Entity | 1 |
| 12/22/2010 | NP11-76-000 | SERC | Unidentified Registered Entity | 1 |
| 12/22/2010 | NP11-72-000 | SERC | Unidentified Registered Entity | 1 |
| 12/22/2010 | NP11-70-000 | WECC | Unidentified Registered Entity | 1 |
| 12/22/2010 | NP11-64-000 | WECC | Unidentified Registered Entity | 1 |
| 12/22/2010 | NP11-63-000 | WECC | Unidentified Registered Entity | 1 |
| 12/22/2010 | NP11-59-000 | RFC | Unidentified Registered Entity | 1 |
| 1/31/2011 | NP11-102-000 | WECC | Unidentified Registered Entity | 1 |
| 1/31/2011 | NP11-98-000 | WECC | Unidentified Registered Entity | 1 |
| 2/1/2011 | NP11-104-000 | Various | Unidentified Registered Entities | 6 |
| 2/23/2011 | NP11-128-000 | WECC | Unidentified Registered Entity | 1 |
| 2/23/2011 | NP11-127-000 | FRCC | Unidentified Registered Entity | 1 |
| 2/23/2011 | NP11-125-000 | SPP, RFC | Unidentified Registered Entity | 1 |
| 2/23/2011 | NP11-124-000 | RFC | Unidentified Registered Entity | 1 |
| 2/23/2011 | NP11-116-000 | FRCC | Unidentified Registered Entity | 1 |
| 2/23/2011 | NP11-111-000 | MRO | Unidentified Registered Entity | 1 |
| 2/23/2011 | NP11-106-000 | RFC | Unidentified Registered Entity | 1 |
| 2/28/2011 | NP11-133-000 | Various | Unidentified Registered Entities | 5 |
| 3/30/2011 | NP11-161-000 | WECC | Unidentified Registered Entity | 1 |
| 3/30/2011 | NP11-157-000 | SERC | Unidentified Registered Entity | 1 |
| 3/30/2011 | NP11-156-000 | SERC | Unidentified Registered Entity | 1 |
| 3/30/2011 | NP11-155-000 | WECC | Unidentified Registered Entity | 1 |
| 3/30/2011 | NP11-150-000 | MRO | Unidentified Registered Entity | 1 |
| 3/30/2011 | NP11-149-000 | RFC | Unidentified Registered Entity | 1 |
| 3/30/2011 | NP11-146-000 | RFC | Unidentified Registered Entities | 3 |
| 3/30/2011 | NP11-145-000 | WECC | Unidentified Registered Entity | 1 |
| 3/30/2011 | NP11-143-000 | SERC | Unidentified Registered Entity | 1 |
| 3/30/2011 | NP11-140-000 | WECC | Unidentified Registered Entity | 1 |
| 3/30/2011 | NP11-137-000 | WECC | Unidentified Registered Entity | 1 |
| 3/30/2011 | NP11-136-000 | WECC | Unidentified Registered Entity | 1 |
| 3/31/2011 | NP11-162-000 | TRE, NPCC | Unidentified Registered Entities | 2 |
| 4/29/2011 | NP11-181-000 | FRCC, NPCC | Unidentified Registered Entities | 6 |
| 4/29/2011 | NP11-180-000 | WECC | Unidentified Registered Entity | 1 |
| 4/29/2011 | NP11-179-000 | MRO | Unidentified Registered Entity | 1 |
| 4/29/2011 | NP11-178-000 | WECC | Unidentified Registered Entity | 1 |
| 4/29/2011 | NP11-176-000 | WECC | Unidentified Registered Entity | 1 |
| 4/29/2011 | NP11-175-000 | WECC | Unidentified Registered Entity | 1 |

| Date | FERC Docket Number | Region | Registered Entity | Entities |
|------------|--------------------|----------|----------------------------------|----------|
| 4/29/2011 | NP11-174-000 | RFC | Unidentified Registered Entity | 1 |
| 4/29/2011 | NP11-167-000 | WECC | Unidentified Registered Entity | 1 |
| 4/29/2011 | NP11-166-000 | SPP, TRE | Unidentified Registered Entity | 1 |
| 5/26/2011 | NP11-199-000 | Various | Unidentified Registered Entities | 3 |
| 5/26/2011 | NP11-198-000 | SPP | Unidentified Registered Entity | 1 |
| 5/26/2011 | NP11-193-000 | WECC | Unidentified Registered Entity | 1 |
| 5/26/2011 | NP11-192-000 | WECC | Unidentified Registered Entity | 1 |
| 5/26/2011 | NP11-189-000 | FRCC | Unidentified Registered Entity | 1 |
| 5/26/2011 | NP11-188-000 | SPP | Unidentified Registered Entity | 1 |
| 5/26/2011 | NP11-184-000 | RFC | Unidentified Registered Entity | 1 |
| 5/26/2011 | NP11-182-000 | WECC | Unidentified Registered Entity | 1 |
| 6/29/2011 | NP11-226-000 | RFC | Unidentified Registered Entity | 1 |
| 6/29/2011 | NP11-225-000 | RFC | Unidentified Registered Entity | 1 |
| 6/29/2011 | NP11-223-000 | SPP | Unidentified Registered Entity | 1 |
| 6/29/2011 | NP11-218-000 | WECC | Unidentified Registered Entity | 1 |
| 6/29/2011 | NP11-213-000 | WECC | Unidentified Registered Entity | 1 |
| 6/29/2011 | NP11-212-000 | WECC | Unidentified Registered Entity | 1 |
| 6/29/2011 | NP11-211-000 | WECC | Unidentified Registered Entity | 1 |
| 6/29/2011 | NP11-206-000 | NPCC | Unidentified Registered Entity | 3 |
| 6/29/2011 | NP11-205-000 | WECC | Unidentified Registered Entity | 1 |
| 6/29/2011 | NP11-204-000 | WECC | Unidentified Registered Entity | 1 |
| 7/28/2011 | NP11-251-000 | WECC | Unidentified Registered Entity | 1 |
| 7/28/2011 | NP11-250-000 | WECC | Unidentified Registered Entity | 1 |
| 7/28/2011 | NP11-249-000 | WECC | Unidentified Registered Entity | 1 |
| 7/28/2011 | NP11-248-000 | WECC | Unidentified Registered Entity | 1 |
| 7/28/2011 | NP11-247-000 | RFC | Unidentified Registered Entity | 1 |
| 7/28/2011 | NP11-243-000 | RFC | Unidentified Registered Entity | 1 |
| 7/28/2011 | NP11-237-000 | RFC | Unidentified Registered Entity | 3 |
| 7/28/2011 | NP11-234-000 | WECC | Unidentified Registered Entity | 1 |
| 7/28/2011 | NP11-233-000 | WECC | Unidentified Registered Entity | 1 |
| 7/28/2011 | NP11-230-000 | RFC | Unidentified Registered Entity | 1 |
| 7/28/2011 | NP11-229-000 | WECC | Unidentified Registered Entity | 1 |
| 7/29/2011 | NP11-253-000 | Various | Unidentified Registered Entities | 8 |
| 8/31/2011 | NP11-266-000 | Various | Unidentified Registered Entities | 5 |
| 8/31/2011 | NP11-264-000 | SPP | Unidentified Registered Entity | 1 |
| 8/31/2011 | NP11-263-000 | TRE | Unidentified Registered Entity | 1 |
| 8/31/2011 | NP11-262-000 | SPP | Unidentified Registered Entity | 1 |
| 8/31/2011 | NP11-261-000 | RFC | Unidentified Registered Entity | 1 |
| 9/30/2011 | RC11-6-000 | Various | Unidentified Registered Entities | 59 |
| 9/30/2011 | NP11-270-000 | Various | Unidentified Registered Entities | 21 |
| 9/30/2011 | NP11-269-000 | WECC | Unidentified Registered Entity | 1 |
| 10/31/2011 | RC12-1-000 | Various | Unidentified Registered Entities | 33 |

| Date | FERC Docket Number | Region | Registered Entity | Entities |
|------------|--------------------|----------|----------------------------------|----------|
| 10/31/2011 | NP12-2-000 | Various | Unidentified Registered Entities | 16 |
| 10/31/2011 | NP12-1-000 | RFC | Unidentified Registered Entities | 3 |
| 11/30/2011 | RC12-2-000 | Various | Unidentified Registered Entities | 30 |
| 11/30/2011 | NP12-5-000 | RF, WECC | Unidentified Registered Entities | 12 |
| 11/30/2011 | NP12-4-000 | WECC | Unidentified Registered Entity | 1 |
| 11/30/2011 | NP12-3-000 | WECC | Unidentified Registered Entity | 1 |
| 12/30/2011 | RC12-6-000 | Various | Unidentified Registered Entities | 40 |
| 12/30/2011 | NP12-10-000 | Various | Unidentified Registered Entities | 21 |
| 12/30/2011 | NP12-9-000 | RFC | Unidentified Registered Entity | 1 |
| 1/31/2012 | RC12-7-000 | Various | Unidentified Registered Entities | 30 |
| 1/31/2012 | NP12-12-000 | Various | Unidentified Registered Entities | 18 |
| 1/31/2012 | NP12-11-000 | WECC | Unidentified Registered Entity | 1 |
| 2/29/2012 | RC12-8-000 | Various | Unidentified Registered Entities | 24 |
| 2/29/2012 | NP12-18-000 | Various | Unidentified Registered Entities | 23 |
| 2/29/2012 | NP12-17-000 | SPP RE | Unidentified Registered Entity | 1 |
| 2/29/2012 | NP12-16-000 | WECC | Unidentified Registered Entity | 1 |
| 3/30/2012 | RC12-10-000 | Various | Unidentified Registered Entities | 12 |
| 3/30/2012 | NP12-22-000 | Various | Unidentified Registered Entities | 15 |
| 3/30/2012 | NP12-20-000 | WECC | Unidentified Registered Entity | 1 |
| 4/30/2012 | RC12-11-000 | Various | Unidentified Registered Entities | 18 |
| 4/30/2012 | NP12-26-000 | Various | Unidentified Registered Entities | 18 |
| 4/30/2012 | NP12-25-000 | RFC | Unidentified Registered Entity | 1 |
| 5/30/2012 | RC12-12-000 | Various | Unidentified Registered Entities | 40 |
| 5/30/2012 | NP12-29-000 | WECC | Unidentified Registered Entity | 1 |
| 5/30/2012 | NP12-27-000 | Various | Unidentified Registered Entities | 20 |
| 6/29/2012 | RC12-13-000 | Various | Unidentified Registered Entities | 40 |
| 6/29/2012 | NP12-36-000 | Various | Unidentified Registered Entities | 15 |
| 7/31/2012 | RC12-14-000 | Various | Unidentified Registered Entities | 30 |
| 7/31/2012 | NP12-40-000 | Various | Unidentified Registered Entities | 15 |
| 7/31/2012 | NP12-38-000 | WECC | Unidentified Registered Entity | 1 |
| 7/31/2012 | NP12-37-000 | WECC | Unidentified Registered Entities | 4 |
| 8/31/2012 | RC12-15-000 | Various | Unidentified Registered Entities | 38 |
| 8/31/2012 | NP12-44-000 | Various | Unidentified Registered Entities | 16 |
| 8/31/2012 | NP12-43-000 | WECC | Unidentified Registered Entity | 1 |
| 9/28/2012 | RC12-16-000 | Various | Unidentified Registered Entities | 41 |
| 9/28/2012 | NP12-47-000 | Various | Unidentified Registered Entities | 14 |
| 9/28/2012 | NP12-46-000 | WECC | Unidentified Registered Entity | 1 |
| 9/28/2012 | NP12-45-000 | FRCC | Unidentified Registered Entity | 1 |
| 10/31/2012 | RC13-1-000 | Various | Unidentified Registered Entities | 44 |
| 10/31/2012 | NP13-5-000 | Various | Unidentified Registered Entities | 19 |
| 10/31/2012 | NP13-4-000 | RFC | Unidentified Registered Entities | 3 |
| 10/31/2012 | NP13-1-000 | WECC | Unidentified Registered Entity | 1 |

| Date | FERC Docket Number | Region | Registered Entity | Entities |
|------------|--------------------|-----------|----------------------------------|----------|
| 11/30/2012 | RC13-2-000 | Various | Unidentified Registered Entities | 25 |
| 11/30/2012 | NP13-6-000 | WECC | Unidentified Registered Entity | 1 |
| 12/31/2012 | RC13-3-000 | Various | Unidentified Registered Entities | 25 |
| 12/31/2012 | NP13-19-000 | SERC | Unidentified Registered Entity | 1 |
| 12/31/2012 | NP13-18-000 | SPP | Unidentified Registered Entity | 1 |
| 12/31/2012 | NP13-17-000 | RFC | Unidentified Registered Entities | 3 |
| 12/31/2012 | NP13-16-000 | WECC | Unidentified Registered Entity | 1 |
| 12/31/2012 | NP13-12-000 | Various | Unidentified Registered Entities | 21 |
| 12/31/2012 | NP13-11-000 | SPP | Unidentified Registered Entity | 1 |
| 1/31/2013 | RC13-5-000 | Various | Unidentified Registered Entities | 22 |
| 1/31/2013 | NP13-23-000 | Various | Unidentified Registered Entities | 22 |
| 1/31/2013 | NP13-22-000 | WECC | Unidentified Registered Entity | 1 |
| 2/28/2013 | RC13-6-000 | Various | Unidentified Registered Entities | 27 |
| 2/28/2013 | NP13-27-000 | Various | Unidentified Registered Entities | 14 |
| 2/28/2013 | NP13-24-000 | WECC | Unidentified Registered Entity | 3 |
| 3/27/2013 | NP13-30-000 | RFC | Unidentified Registered Entity | 3 |
| 3/27/2013 | NP13-29-000 | Various | Unidentified Registered Entities | 10 |
| 3/27/2013 | NP13-28-000 | Various | Unidentified Registered Entity | 1 |
| 4/30/2013 | RC13-8-000 | Various | Unidentified Registered Entities | 50 |
| 4/30/2013 | NP13-33-000 | Various | Unidentified Registered Entities | 18 |
| 4/30/2013 | NP13-32-000 | NERC | Unidentified Registered Entity | 1 |
| 5/30/2013 | NP13-34-000 | Texas RE | Unidentified Registered Entity | 1 |
| 5/30/2013 | RC13-9-000 | Various | Unidentified Registered Entities | 53 |
| 5/30/2013 | NP13-38-000 | WECC | Unidentified Registered Entity | 1 |
| 5/30/2013 | NP13-39-000 | Various | Unidentified Registered Entities | 16 |
| 6/27/2013 | RC13-10-000 | Various | Unidentified Registered Entities | 52 |
| 6/27/2013 | NP13-41-000 | Various | Unidentified Registered Entities | 20 |
| 7/31/2013 | NP13-47-000 | RFC, SERC | Unidentified Registered Entities | 2 |
| 7/31/2013 | NP13-46-000 | Various | Unidentified Registered Entities | 18 |
| 7/31/2013 | NP13-45-000 | WECC | Unidentified Registered Entity | 1 |
| 8/30/2013 | NP13-51-000 | Various | Unidentified Registered Entities | 18 |
| 9/30/2013 | NP13-57-000 | Various | Unidentified Registered Entities | 12 |
| 9/30/2013 | NP13-55-000 | WECC | Unidentified Registered Entity | 1 |
| 10/30/2013 | NP14-5-000 | RFC | Unidentified Registered Entity | 1 |
| 10/30/2013 | NP14-4-000 | RF, SERC | Unidentified Registered Entities | 16 |
| 11/27/2013 | NP14-6-000 | Various | Unidentified Registered Entities | 14 |
| 12/30/2013 | NP14-22-000 | WECC | Unidentified Registered Entity | 1 |
| 12/30/2013 | NP14-20-000 | SERC | Unidentified Registered Entity | 1 |
| 12/30/2013 | NP14-19-000 | WECC | Unidentified Registered Entity | 1 |
| 12/30/2013 | NP14-18-000 | SERC | Unidentified Registered Entity | 1 |
| 12/30/2013 | NP14-17-000 | WECC | Unidentified Registered Entity | 1 |
| 12/30/2013 | NP14-16-000 | SERC | Unidentified Registered Entity | 1 |

| Date | FERC Docket Number | Region | Registered Entity | Entities |
|------------|--------------------|---------|----------------------------------|----------|
| 12/30/2013 | NP14-14-000 | Various | Unidentified Registered Entities | 18 |
| 12/31/2013 | NP14-26-000 | SERC | Unidentified Registered Entity | 1 |
| 12/31/2013 | NP14-25-000 | SERC | Unidentified Registered Entity | 1 |
| 12/31/2013 | NP14-24-000 | SERC | Unidentified Registered Entity | 1 |
| 12/31/2013 | NP14-23-000 | SPP RE | Unidentified Registered Entity | 1 |
| 12/31/2013 | NP14-21-000 | SERC | Unidentified Registered Entity | 1 |

In the instances where there was a “Spreadsheet NOP” or a “FFT” spreadsheet I request a copy of the spreadsheet that lists the name(s) of the entity subject to the regulatory action as well as the “Notice of Penalty.” There is a total of 190 docket numbers covered under this request, with a total of 1384 “Unidentified Registered Entities.”

The records sought are not Critical Energy Infrastructure Information (CEII) or otherwise classified to protect national security:

I note that FERC Order No. 833 holds that the Commission’s practice is that information that “simply give[s] the general location of the critical infrastructure” or simply provides the name of the facility is not Critical Energy Infrastructure Information (CEII).² I am not seeking any CEII. I simply ask for disclosure of the identities of the “Unidentified Registered Entities” in the above dockets.

There is no national security reason or FOIA exemption that should prevent disclosure of the identity of this violator of reliability standards to the public, because the NERC Notice of Penalty claims that the cybersecurity vulnerabilities have been remedied.

Mere disclosure of the identity of the violating entity, without disclosure of the details of any remedied cybersecurity violations, will not provide adversaries information of any value but instead will likely reduce future violations. Disclosure of the identity of violators will prompt other utilities to be more diligent in order to avoid adverse publicity. The possibility of public shaming is a key component of the mandatory system of electric reliability standards established by Congress under Section 215 of the Federal Power Act and further codified in the Code of Federal Regulations. For example, when a utility has caused a blackout, FERC has had no issue in identifying the offending utilities and the amount of the fines. Would it not be better to identify reliability standard violators and therefore avoid blackouts?

I lastly note that the public has already been forced to wait years for this information, allowing electric utilities to hide behavior that causes profound risk to the public interest.

Under FERC’s regulations, the names of the entities must be disclosed:

18 CFR § 39.7 (b)(4) provides that: “Each violation or alleged violation shall be treated as nonpublic until the matter is filed with the Commission as a notice of penalty or resolved by an admission that the user, owner or operator of the Bulk-Power System violated a Reliability Standard or by a settlement or other negotiated disposition.” [Emphasis added.]

Further, 18 CFR § 39.7(d)(1) provides that a notice of penalty by the Electric Reliability Organization shall consist of, *inter alia*: “The name of the entity on whom the penalty is imposed.”

² Order No. 833 at pg. 17. Also see 18 C.F.R. §388.113(c)(1)(iv).

The regulations are very clear that the name of the entity on whom the penalty is imposed is to be disclosed. Yet, somehow this is not the practice at NERC and the records I am requesting have had the names of the registered entities hidden from the public.

The records sought would not reveal trade secrets and commercial or financial information obtained from a person and privileged or confidential:

I note that it has been practice for FERC and NERC to disclose the identities of some entities who have been subject to regulatory fines by NERC. Therefore, those entities violating reliability standards have not been considered privileged or confidential information, solely on the basis of being a violator.

I also note that it is inconsistent with a well-functioning democracy for monetary penalties to be assessed against regulated entities whose identities are then held as secrets. I urge the Commission to reconsider the implications of allowing NERC, the FERC-designated Electric Reliability Organization (ERO), to have delegated authority to assess fines for wrongdoing and then to keep the identities of wrongdoers from public view. I know of no other federal regulator that allows this odious practice.

Request for Waiver of Fees:

I am a private citizen with expertise in emergency preparedness and critical infrastructure protection. I maintain a blog where I intend to disseminate this information³. I accept no advertising on my blog and derive no revenue from writing or posting my blog articles.

As set forth fully below, I am entitled to a waiver of fees as I meet all the requirements of 18 C.F.R. §388.109(c).

Requirement: In accordance with 18 C.F.R. §388.109(c)(1), “(1) Any fee described in this section may be reduced or waived if the requester demonstrates that disclosure of the information sought is: (i) In the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government, and (ii) Not primarily in the commercial interest of the requester.”

Answer: Disclosure of this information will inform the public as to the actions the government and the designated ERO have taken to insure the security of the bulk power system. There has been a great deal of media attention and government notices regarding recent cyberattacks and cybersecurity breaches to the electric grid.⁴ Disclosure of the requested information is critical to the public’s understanding of how FERC and the ERO holds regulated entities accountable to compliance with regulatory standards for cybersecurity.

I have no commercial interest in these records and will use these records in research and information dissemination to the public.

Requirement: In accordance with 18 C.F.R. §388.109(c)(2) “The Commission will consider the following criteria to determine the public interest standard:”

Answer: I will answer each criterion in turn.

³ <https://michaelmabee.info/category/mikes-blog/> (accessed April 13, 2018).

⁴ See for example: US-CERT Alert (TA18-074A) <https://www.us-cert.gov/ncas/alerts/TA18-074A> (accessed March 15, 2018); Gizmodo: “FBI and DHS Warn That Russia Has Been Poking at Our Energy Grid.” <https://apple.news/AHv5RwYqbSf-El-yla355Jw> (accessed March 15, 2018); Washington Free Beacon: “Russia Implicated in Ongoing Hack on U.S. Grid.” <https://apple.news/AGs6ieh6wSP-1tQkUFttREA> (accessed March 15, 2018); Slate: “What Does It Mean to Hack an Electrical Grid?” <https://apple.news/Au5gy7bTtDSovpvzg5j79w>

Criterion: (i) “Whether the subject of the requested records concerns the operations or activities of the government”

Answer: The protection of the critical infrastructure, including the bulk power system, is a clear function of the federal government.⁵ The regulation of the critical infrastructures by the federal government and the transparency of the process – including the identities of entities that violate reliability standards– concerns the operations or activities of the government.

Criterion: (ii) “Whether the disclosure is likely to contribute to an understanding of government operations or activities”

Answer: According to NERC, many of “[t]hese violations posed a serious or substantial risk to the reliability of the bulk power system (BPS).” The entities in question risked the reliable operation of the bulk power system and therefore the public has a right to examine this incident and the behavior and actions of the violating entity.

Criterion: (iii) “Whether disclosure of the requested information will contribute to public understanding”

Answer: As previously noted, there has been a great deal of public attention, press articles and increased awareness to the threat of cyberattacks against the bulk power system. The identity of entities that place the public at risk by violating cybersecurity standards is critical to the public understanding of the effectiveness of existing standards.

Criterion: (iv) “Whether the disclosure is likely to contribute significantly to public understanding of government operations or facilities.”

Answer: Under Section 215 of the Federal Power Act, regulation of the bulk power system is clearly a government operation. The public needs to understand how reliability standards are being enforced.

Requirement: In accordance with 18 C.F.R. §388.109(c)(3) “The Commission will consider the following criteria to determine the commercial interest of the requester:”

Answer: I will answer each criterion in turn.

Criterion: (i) Whether the requester has a commercial interest that would be furthered by the requested disclosure.

Answer: No. The requester a private citizen and has no commercial interest in the information.

And, if so: criterion: (ii) Whether the magnitude of the identified commercial interest of the requester is sufficiently large, in comparison with the public interest in disclosure, that disclosure is primarily in the commercial interest of the requester.

⁵ Executive Order 13800 “Strengthening the Cybersecurity of Federal Networks and Critical Infrastructure.” May 11, 2017. <https://www.gpo.gov/fdsys/pkg/FR-2017-05-16/pdf/2017-10004.pdf> (accessed March 24, 2018); Presidential Policy Directive 21 (PPD-21) – Critical Infrastructure Security and Resilience. February 12, 2013. <https://obamawhitehouse.archives.gov/the-press-office/2013/02/12/presidential-policy-directive-critical-infrastructure-security-and-resil> (accessed March 24, 2018).

FOIA Request

9

Answer: Not applicable since the requester has no commercial interest in the information.

The records may be provided to me electronically at this email address: CivilDefenseBook@gmail.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'm' followed by a flourish.

Michael Mabee

Exhibit 105

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

Plaintiff's August 3, 2019 FOIA Request.

Michael Mabee
 8 Westgate Road
 Mont Vernon, NH 03057
 (516) 808-0883
 CivilDefenseBook@gmail.com

Accepted: August 5, 2019

Track 2

Due Date: September 3, 2019

August 3, 2019

Leonard Tao,
 Director and Chief FOIA Officer
 Federal Energy Regulatory Commission
 888 First Street, NE
 Washington, DC 20426

Subject: Request under the Freedom of Information Act (FOIA), 5 U.S.C. § 552.

Dear Mr. Tao:

I request records under the Freedom of Information Act, which are described below.¹ Further, as more fully set forth below, I also request a fee waiver as I have no commercial interest in the described records and it is in the public interest for the Federal Energy Regulatory Commission (FERC) to disclose these records to the public.

Description of records sought:

I seek the "NERC Notice of Penalty" version which includes the name of the registered entity (and which has been previously withheld from the public) for the following docket numbers:

| Date | FERC Docket Number | Region | Registered Entity | Entities |
|-----------|--------------------|-----------|----------------------------------|----------|
| 1/25/2019 | NP19-4-000 | unk | Unidentified Registered Entity | 1 |
| 2/28/2019 | NP19-5-000 | FRCC/SPP | Unidentified Registered Entities | unk |
| 3/28/2019 | NP19-6-000 | WECC | Unidentified Registered Entities | unk |
| 4/30/2019 | NP19-7-000 | WECC | Unidentified Registered Entity | 1 |
| 4/30/2019 | NP19-9-000 | FRCC | Unidentified Registered Entity | 1 |
| 5/30/2019 | NP19-10-000 | unk | Unidentified Registered Entity | 1 |
| 5/30/2019 | NP19-11-000 | unk | Unidentified Registered Entity | 1 |
| 6/26/2019 | NP19-14-000 | SERC | Unidentified Registered Entity | 1 |
| 6/27/2019 | NP19-12-000 | NPCC/WECC | Unidentified Registered Entities | unk |
| 7/31/2019 | NP19-15-000 | NPCC/WECC | Unidentified Registered Entities | unk |

In the instances where there was a "Spreadsheet NOP" or a "FFT" spreadsheet I request a copy of the spreadsheet that lists the name(s) of the entity subject to the regulatory action as well as the "Notice of Penalty." There is a total of 10 docket numbers covered under this request, with an unknown total of "Unidentified Registered Entities."

¹ This is a new request. I submitted a previous requests for a different sets of records on December 18, 2018 (FOIA-2019-0019) and on January 12, 2019 (FOIA 2019-0030).

The records sought are not Critical Energy Infrastructure Information (CEII) or otherwise classified to protect national security:

I note that FERC Order No. 833 holds that the Commission's practice is that information that "simply give[s] the general location of the critical infrastructure" or simply provides the name of the facility is not Critical Energy Infrastructure Information (CEII).² I am not seeking any CEII. I simply ask for disclosure of the identities of the "Unidentified Registered Entities" in the above dockets.

There is no national security reason or FOIA exemption that should prevent disclosure of the identity of this violator of reliability standards to the public, because the NERC Notice of Penalty claims that the cybersecurity vulnerabilities have been remedied.

Mere disclosure of the identity of the violating entity, without disclosure of the details of any remedied cybersecurity violations, will not provide adversaries information of any value but instead will likely reduce future violations. Disclosure of the identity of violators will prompt other utilities to be more diligent in order to avoid adverse publicity. The possibility of public shaming is a key component of the mandatory system of electric reliability standards established by Congress under Section 215 of the Federal Power Act and further codified in the Code of Federal Regulations. For example, when a utility has caused a blackout, FERC has had no issue in identifying the offending utilities and the amount of the fines. Would it not be better to identify reliability standard violators and therefore avoid blackouts?

I lastly note that allowing electric utilities to hide behavior that causes such a profound risk is contrary to the public interest and provides no incentive for the regulated entities to change their behavior.

Under FERC's regulations, the names of the entities must be disclosed:

18 CFR § 39.7 (b)(4) provides that: "Each violation or alleged violation shall be treated as nonpublic until the matter is filed with the Commission as a notice of penalty or resolved by an admission that the user, owner or operator of the Bulk-Power System violated a Reliability Standard or by a settlement or other negotiated disposition." [Emphasis added.]

Further, 18 CFR § 39.7(d)(1) provides that a notice of penalty by the Electric Reliability Organization shall consist of, *inter alia*: "The name of the entity on whom the penalty is imposed."

The regulations are very clear that the name of the entity on whom the penalty is imposed is to be disclosed. Yet, somehow this is not the practice at NERC and the records I am requesting have had the names of the registered entities hidden from the public.

The records sought would not reveal trade secrets and commercial or financial information obtained from a person and privileged or confidential:

I note that it has been practice for FERC and NERC to disclose the identities of some entities who have been subject to regulatory fines by NERC. Therefore, those entities violating reliability standards have not been considered privileged or confidential information, solely on the basis of being a violator.

I also note that it is inconsistent with a well-functioning democracy for monetary penalties to be assessed against regulated entities whose identities are then held as secrets. I urge the Commission to reconsider the implications of allowing NERC, the FERC-designated Electric Reliability Organization (ERO), to have delegated authority to assess fines for wrongdoing and then to keep the identities of wrongdoers from public view. I know of no other federal regulator that allows this odious practice.

² Order No. 833 at pg. 17. Also see 18 C.F.R. §388.113(c)(1)(iv).

According to NERC, the majority of the violations have already been mitigated.

Appendix 1 (attached) is the relevant entries from NERC's website³ showing that all the requested dockets have already passed the "Mitigation Completion Date" with one exception. That exception is NP19-4-000 which the press has already outed as Duke Energy Corp.⁴ Therefore, all the names of these violators should be released to the public.

Request for Waiver of Fees:

I am a private citizen with expertise in emergency preparedness and critical infrastructure protection. I maintain a blog where I intend to disseminate this information⁵. I accept no advertising on my blog and derive no revenue from writing or posting my blog articles.

As set forth fully below, I am entitled to a waiver of fees as I meet all the requirements of 18 C.F.R. §388.109(c).

Requirement: In accordance with 18 C.F.R. §388.109(c)(1), "(1) Any fee described in this section may be reduced or waived if the requester demonstrates that disclosure of the information sought is: (i) In the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government, and (ii) Not primarily in the commercial interest of the requester."

Answer: Disclosure of this information will inform the public as to the actions the government and the designated ERO have taken to insure the security of the bulk power system. There has been a great deal of media attention and government notices and hearings regarding recent cyberattacks and cybersecurity breaches to the electric grid.⁶ Disclosure of the requested information is critical to the public's understanding of how FERC and the ERO holds regulated entities accountable to compliance with regulatory standards for cybersecurity.

I have no commercial interest in these records and will use these records in research and information dissemination to the public.

Requirement: In accordance with 18 C.F.R. §388.109(c)(2) "The Commission will consider the following criteria to determine the public interest standard:"

Answer: I will answer each criterion in turn.

³ [https://www.nerc.com/pa/comp/CE/Enforcement%20Actions%20DL/Searchable Enforcement Page 07312019.xlsx](https://www.nerc.com/pa/comp/CE/Enforcement%20Actions%20DL/Searchable%20Enforcement%20Page%2007312019.xlsx) (accessed August 3, 2019).

⁴ Sobczak, Blake and Behr, Peter. "Duke agreed to pay record fine for lax security — sources" E&E News, February 1, 2019. <https://www.eenews.net/energywire/2019/02/01/stories/1060119265?fbclid> (accessed August 3, 2019).

⁵ <https://michaelmabee.info> (accessed April 13, 2018).

⁶ See for example: US-CERT Alert (TA18-074A) <https://www.us-cert.gov/ncas/alerts/TA18-074A> (accessed March 15, 2018); Gizmodo: "FBI and DHS Warn That Russia Has Been Poking at Our Energy Grid." <https://apple.news/AHv5RWYqbSf-El-yla355Jw> (accessed March 15, 2018); Washington Free Beacon: "Russia Implicated in Ongoing Hack on U.S. Grid." <https://apple.news/AGs6ieh6wSP-1tQkUFttREA> (accessed March 15, 2018); Slate: "What Does It Mean to Hack an Electrical Grid?" <https://apple.news/Au5gy7bTITDSovpvzg5j79w> Senate Hearing: "Hearing to Consider the Status and Outlook for Cybersecurity Efforts in the Energy Industry." February 14, 2019. <https://michaelmabee.info/senate-cybersecurity-hearing/> (accessed August 3, 2019); House Hearing: "Keeping The Lights On: Addressing Cyber Threats To The Grid." July 12, 2019. <https://michaelmabee.info/house-cybersecurity-hearing/> (accessed August 3, 2019).

Criterion: (i) “Whether the subject of the requested records concerns the operations or activities of the government”

Answer: The protection of the critical infrastructure, including the bulk power system, is a clear function of the federal government.⁷ The regulation of the critical infrastructures by the federal government and the transparency of the process – including the identities of entities that violate reliability standards– concerns the operations or activities of the government.

Criterion: (ii) “Whether the disclosure is likely to contribute to an understanding of government operations or activities”

Answer: According to NERC, many of “[t]hese violations posed a serious or substantial risk to the reliability of the bulk power system (BPS).” The entities in question risked the reliable operation of the bulk power system and therefore the public has a right to examine this incident and the behavior and actions of the violating entity.

Criterion: (iii) “Whether disclosure of the requested information will contribute to public understanding”

Answer: As previously noted, there has been a great deal of public attention, press articles, Congressional hearings and increased awareness to the threat of cyberattacks against the bulk power system. The identity of entities that place the public at risk by violating cybersecurity standards is critical to the public understanding of the effectiveness of existing standards.

Criterion: (iv) “Whether the disclosure is likely to contribute significantly to public understanding of government operations or facilities.”

Answer: Under Section 215 of the Federal Power Act, regulation of the bulk power system is clearly a government operation. The public needs to understand how reliability standards are being enforced.

Requirement: In accordance with 18 C.F.R. §388.109(c)(3) “The Commission will consider the following criteria to determine the commercial interest of the requester:”

Answer: I will answer each criterion in turn.

Criterion: (i) Whether the requester has a commercial interest that would be furthered by the requested disclosure.

Answer: No. The requester a private citizen and has no commercial interest in the information.

And, if so: criterion: (ii) Whether the magnitude of the identified commercial interest of the requester is sufficiently large, in comparison with the public interest in disclosure, that disclosure is primarily in the commercial interest of the requester.

Answer: Not applicable since the requester has no commercial interest in the information.

⁷ Executive Order 13800 “Strengthening the Cybersecurity of Federal Networks and Critical Infrastructure.” May 11, 2017. <https://www.gpo.gov/fdsys/pkg/FR-2017-05-16/pdf/2017-10004.pdf> (accessed March 24, 2018); Presidential Policy Directive 21 (PPD-21) – Critical Infrastructure Security and Resilience. February 12, 2013. <https://obamawhitehouse.archives.gov/the-press-office/2013/02/12/presidential-policy-directive-critical-infrastructure-security-and-resil> (accessed March 24, 2018).

FOIA Request

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The records may be provided to me electronically at this email address: CivilDefenseBook@gmail.com.

Sincerely,

A handwritten signature in blue ink, appearing to be 'm' followed by a flourish.

Michael Mabee

| Date | Regulatory Authority | Regulatory Filing ID | Region | Registered Entity | NERC Violation ID | Mitigation Completion Date |
|-----------|----------------------|----------------------|--------|--------------------------------|-------------------|----------------------------|
| 7/31/2019 | FERC | NP19-15-000 | WECC | Unidentified Registered Entity | WECC2016015862 | 11/14/2017 |
| 7/31/2019 | FERC | NP19-15-000 | WECC | Unidentified Registered Entity | WECC2018020282 | 5/15/2017 |
| 7/31/2019 | FERC | NP19-15-000 | NPCC | Unidentified Registered Entity | NPCC2018020351 | 9/4/2018 |
| 7/31/2019 | FERC | NP19-15-000 | NPCC | Unidentified Registered Entity | NPCC2018020346 | 9/6/2018 |
| 7/31/2019 | FERC | NP19-15-000 | NPCC | Unidentified Registered Entity | NPCC2018020350 | 9/18/2018 |
| 7/31/2019 | FERC | NP19-15-000 | NPCC | Unidentified Registered Entity | NPCC2018020348 | 9/4/2018 |
| 7/31/2019 | FERC | NP19-15-000 | NPCC | Unidentified Registered Entity | NPCC2018020347 | 9/4/2018 |
| 7/31/2019 | FERC | NP19-15-000 | WECC | Unidentified Registered Entity | WECC2017016929 | 6/5/2018 |
| 7/31/2019 | FERC | NP19-15-000 | WECC | Unidentified Registered Entity | WECC2017016926 | 3/29/2019 |
| 7/31/2019 | FERC | NP19-15-000 | WECC | Unidentified Registered Entity | WECC2017016940 | 10/19/2018 |
| 7/31/2019 | FERC | NP19-15-000 | WECC | Unidentified Registered Entity | WECC2017016938 | 5/17/2018 |
| 7/31/2019 | FERC | NP19-15-000 | WECC | Unidentified Registered Entity | WECC2017016939 | 4/10/2018 |
| 7/31/2019 | FERC | NP19-15-000 | WECC | Unidentified Registered Entity | WECC2017016928 | 12/19/2018 |
| 7/31/2019 | FERC | NP19-15-000 | WECC | Unidentified Registered Entity | WECC2017016941 | 5/23/2018 |
| 7/31/2019 | FERC | NP19-15-000 | WECC | Unidentified Registered Entity | WECC2018019006 | 4/4/2018 |
| 7/31/2019 | FERC | NP19-15-000 | WECC | Unidentified Registered Entity | WECC2018020039 | 5/3/2018 |
| 7/31/2019 | FERC | NP19-15-000 | WECC | Unidentified Registered Entity | WECC2017017885 | 2/8/2019 |
| 7/31/2019 | FERC | NP19-15-000 | WECC | Unidentified Registered Entity | WECC2017018174 | 10/4/2018 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2016015954 | 4/19/2019 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2017018136 | 9/15/2017 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2017018279 | 9/22/2017 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2017018774 | 12/18/2017 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2016016548 | 8/17/2018 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2017017286 | 6/26/2018 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2017018440 | 1/23/2018 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2017018441 | 4/18/2019 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2016016492 | 1/19/2017 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2017018467 | 10/11/2017 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2017017236 | 7/10/2018 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2017016832 | 2/8/2019 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2017018246 | 7/12/2018 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2018019200 | 7/23/2018 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2017018548 | 12/6/2017 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2016016339 | 10/26/2016 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2016016321 | 4/27/2018 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2018019106 | 4/27/2018 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2016016379 | 9/4/2018 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2016016572 | 9/4/2018 |
| 6/27/2019 | FERC | NP19-14-000 | SERC | Unidentified Registered Entity | SERC2017017564 | 9/4/2018 |
| 6/27/2019 | FERC | NP19-12-000 | NPCC | Unidentified Registered Entity | NPCC2018020059 | 12/14/2018 |
| 6/27/2019 | FERC | NP19-12-000 | NPCC | Unidentified Registered Entity | NPCC2018020060 | 12/14/2018 |
| 6/27/2019 | FERC | NP19-12-000 | NPCC | Unidentified Registered Entity | NPCC2018020061 | 12/14/2018 |
| 6/27/2019 | FERC | NP19-12-000 | NPCC | Unidentified Registered Entity | NPCC2018020063 | 12/14/2018 |
| 6/27/2019 | FERC | NP19-12-000 | NPCC | Unidentified Registered Entity | NPCC2018020064 | 12/14/2018 |
| 6/27/2019 | FERC | NP19-12-000 | NPCC | Unidentified Registered Entity | NPCC2018020062 | 12/14/2018 |
| 6/27/2019 | FERC | NP19-12-000 | WECC | Unidentified Registered Entity | WECC2017018752 | 11/6/2017 |
| 6/27/2019 | FERC | NP19-12-000 | WECC | Unidentified Registered Entity | WECC2018019340 | 8/14/2018 |
| 6/27/2019 | FERC | NP19-12-000 | WECC | Unidentified Registered Entity | WECC2017018489 | 11/8/2017 |
| 6/27/2019 | FERC | NP19-12-000 | WECC | Unidentified Registered Entity | WECC2017018732 | 8/15/2018 |
| 6/27/2019 | FERC | NP19-12-000 | WECC | Unidentified Registered Entity | WECC2017017229 | 3/1/2017 |
| 6/27/2019 | FERC | NP19-12-000 | WECC | Unidentified Registered Entity | WECC2018020044 | 12/19/2017 |
| 6/27/2019 | FERC | NP19-12-000 | WECC | Unidentified Registered Entity | WECC2018020045 | 12/19/2017 |

[illegible]

[illegible]

[illegible]

[illegible]

New FOIA Request

civildefensebook@gmail.com

Sat 8/3/2019 4:37 PM

To: FOIA-CEII <FOIA-CEII@ferc.gov>;

 1 attachments (223 KB)

2019-08-03 FERC FOIA Request (Mabee).pdf;

FERC:

Please see the attached new FOIA request.

Thank you,

Michael Mabee

(516) 808-0883

[Secure The Grid – CLICK HERE](#)

Exhibit 106

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

The March 21, 2019 agreement between Defendant and Plaintiff.

At the request of FERC's staff, I agreed that FERC could provide page 1 of the public version of the "Notice of Penalty" with the docket number and name of the "Unidentified Registered Entity(s)" inserted on the top of the page.

civildefensebook@gmail.com

From: civildefensebook@gmail.com
Sent: Thursday, March 21, 2019 8:53 AM
To: 'Jonathan O'Connell'; 'Michelle A. Davis'
Cc: 'FOIA-CEII'
Subject: RE: FOIA 19-30 and FOIA 19-19

Jonathan,

This confirms that for FOIA2019-19 and FOIA2019-30 I am okay with FERC adding the docket number along with the URE name to the NOP in connection with any future releases of URE identities.

Michael Mabee
(516) 808-0883

[Secure The Grid – CLICK HERE](#)

From: Jonathan O'Connell <Jonathan.O'Connell@ferc.gov>
Sent: Thursday, March 21, 2019 9:38 AM
To: civildefensebook@gmail.com; Michelle A. Davis <Michelle.Davis2@ferc.gov>
Cc: FOIA-CEII <FOIA-CEII@ferc.gov>; Jonathan O'Connell <Jonathan.O'Connell@ferc.gov>
Subject: RE: FOIA 19-30 and FOIA 19-19

Good morning Mike,

Thanks for your voicemail and the note below. I do not anticipate any issue with adding the docket no. in connection with any future releases of URE identities. Please confirm that you are okay with us doing it on a prospective basis. Thanks again for your patience in processing your request, and the kind words in your voicemail regarding staff's efforts.

Jonathan E. O'Connell, SHRM-SCP
Attorney-Advisor
Federal Energy Regulatory Commission
Office of General Counsel
General and Administrative Law
888 First Street N.E.
Washington, D.C. 20426
202-502-6708
jonathan.oconnell@ferc.gov

From: civildefensebook@gmail.com [<mailto:civildefensebook@gmail.com>]
Sent: Wednesday, March 20, 2019 6:55 PM
To: Jonathan O'Connell <Jonathan.O'Connell@ferc.gov>; Michelle A. Davis <Michelle.Davis2@ferc.gov>
Cc: FOIA-CEII <FOIA-CEII@ferc.gov>
Subject: RE: FOIA 19-30 and FOIA 19-19

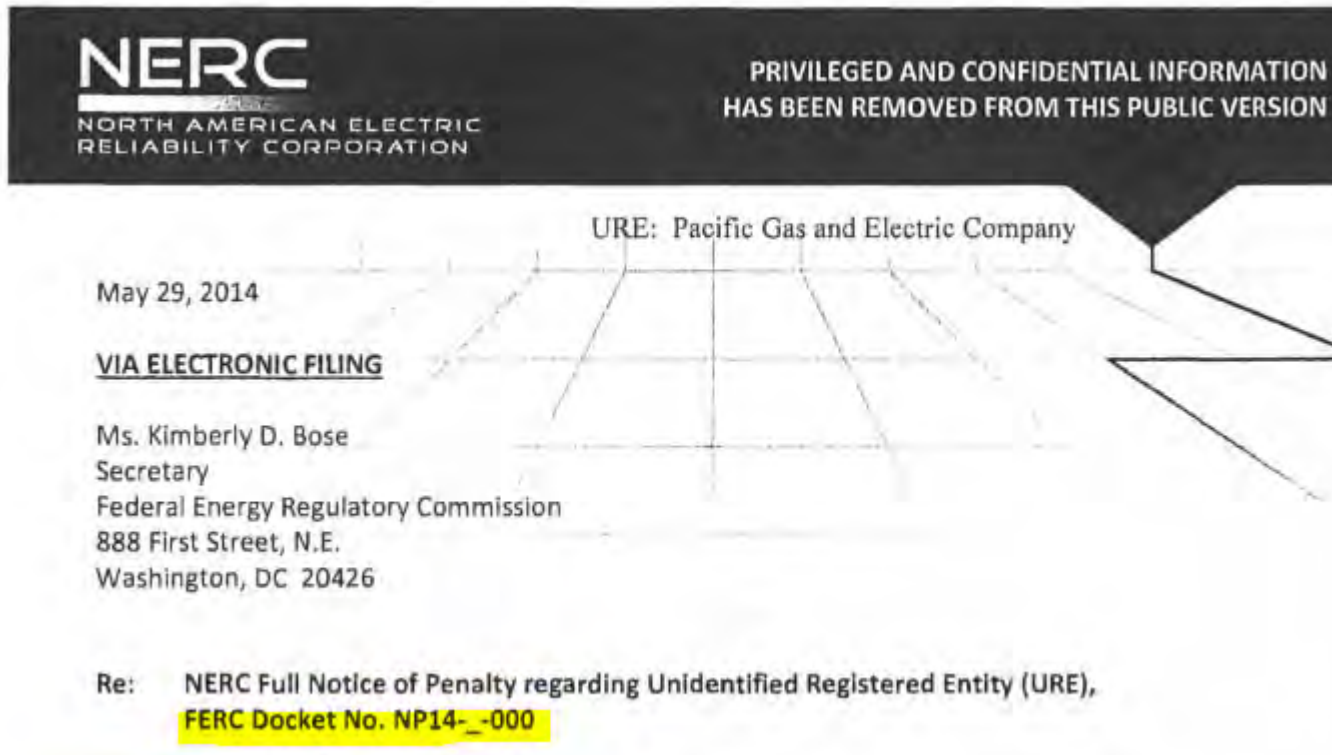
Jonathan and Michelle:

I have identified an issue with your proposed method of disclosure. I also have a proposed fix which I do not believe should be any additional work. Many times, there are multiple NOPs submitted on one day. It is going to be difficult for me to determine which NOP corresponds to which docket number as the NOP itself does not yet have a docket number yet when it was submitted by NERC (see below example).

I propose that you insert the FERC docket number below the name of the URE that you are inserting on top the pages. That would satisfy my needs and I do not believe it would be any additional work for you.

I hope this fix is acceptable.

Mike



Michael Mabee
(516) 808-0883
[Secure The Grid – CLICK HERE](#)

civildefensebook@gmail.com

From: Jonathan O'Connell <Jonathan.O'Connell@ferc.gov>
Sent: Friday, March 1, 2019 8:58 AM
To: CivilDefenseBook
Cc: Jonathan O'Connell; Michelle A. Davis
Subject: FOIA 19-30

Hi Mike,

It was good chatting last night. Per our discussion, thanks again for the 10 day extension in connection with FOIA FY19-30. As mentioned, Michelle Davis (cc'd) and I are working on these FOIAs together, and we both appreciate the considerable flexibility you've provided us as we work to process these requests. Have a great weekend!

Jon

Jonathan E. O'Connell, SHRM-SCP
Attorney-Advisor
Federal Energy Regulatory Commission
Office of General Counsel
General and Administrative Law
888 First Street N.E.
Washington, D.C. 20426
202-502-6708
jonathan.oconnell@ferc.gov

Exhibit 107

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

FERC's September 19, 2019 determination letter to Foundation for Resilient Societies (FRS).

Marked to show the two docket numbers in which the violator's names were released to FRS:
NP11-1-000 and NP12-20-000.

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

SEP 19 2019

Re: Second Rolling Response
FOIA No. FY19-69

VIA EMAIL AND REGULAR MAIL

Thomas S. Popik
Chairman and President
Foundation for Resilient Societies
24 Front Street, Suite 203
Exeter, NH 03833
thomasp@resilientsocieties.org

Dear Mr. Popik:

This is a response to your correspondence received on April 24, 2019, in which you requested information pursuant to the Freedom of Information Act (FOIA),¹ and the Federal Energy Regulatory Commission's (Commission) FOIA regulations, 18 C.F.R. § 388.108 (2019).

By letter dated August 13, 2019, I advised the submitter and the concerned Unidentified Registered Entities (URE) that a copy of the public version of the Notice of Penalty associated with Docket Nos. NP11-1 and NP12-20 along with the name of the URE inserted on the first page, would be disclosed to you no sooner than five calendar days from the date of my letter. *See* 18 C.F.R. § 388.112(e). The five-day notice period has elapsed and I am now releasing these public NOPs with the associated URE names on the first page to you.

Ordinarily, any appeal from a FOIA determination must be filed within 90 days of the date of issuance as provided by the FOIA and 18 C.F.R. § 388.110(a)(1) of the Commission's regulations. However, because your request is being processed on a rolling basis, the Commission will hold your appeal rights in abeyance pending a final determination. This will allow you to file a single appeal at the conclusion of our processing of your request.

If you decide to appeal, this appeal must be in writing, addressed to James P. Danly, General Counsel, Federal Energy Regulatory Commission, 888 First Street, NE, Washington, D.C. 20426, and clearly marked "Freedom of Information Act Appeal." Please include a copy to Charles A. Beamon, Associate General Counsel, General and Administrative Law, at the same address.

¹ 5 U.S.C. § 552, *as amended* by the FOIA Improvement Act of 2016, Pub. L. No. 114-185, 130 Stat. 538 (2016).

FOIA No. FY19-69

- 2 -

You also have the right to seek dispute resolution services from the FOIA Public Liaison of the agency or the Office of Government Information Services (OGIS). Using OGIS services does not affect your right to pursue your appeal. You may contact OGIS by mail at Office of Government Information Services, National Archives and Records Administration, Room 2510, 8601 Adelphi Road, College Park, MD 20740-6001; email at ogis@nara.gov; telephone at 301-837-1996; facsimile at 301-837-0348; or toll-free at 1-877-684-6448.

Sincerely,

A handwritten signature in black ink, appearing to read "Leonard M. Tao". The signature is fluid and cursive, with the first name "Leonard" being the most prominent part.

Leonard M. Tao
Director
Office of External Affairs

cc:

Edwin G. Kichline, Esq.
North American Electric Reliability Corporation
1325 G Street N.W. Suite 600
Washington, DC 20005
edwin.kichline@nerc.net

Sonia Mendonca, Esq.
North American Electric Reliability Corporation
1325 G Street N.W. Suite 600
Washington, DC 20005
Sonia.mendonca@nerc.net

(Enclosures)

Exhibit 108

To Declaration of Michael Mabee
Civil Action No. 19-3448 (FYP)

Description:

FERC's January 29, 2021 denial letter regarding, among others, docket no.
NP11-1-000.

Federal Energy Regulatory Commission
Washington, D.C. 20426
January 29, 2021

Re: FOIA FY19-30 and FOIA
FY19-19 (Rolling)
Response Letter – Denial

VIA ELECTRONIC MAIL ONLY

Michael Mabee
6937 Nine Mile Bridge Road
Fort Worth, TX 76135
CivilDefenseBook@gmail.com

Dear Mr. Mabee:

This is a rolling response to your correspondence received in January 2019, in which you requested information pursuant to the Freedom of Information Act (FOIA), and the Federal Energy Regulatory Commission's (Commission) FOIA regulations. *See* 5 U.S.C. § 552 (2018); 18 C.F.R. § 388.108 (2020). Your request is for the names of the Unidentified Registered Entities (UREs) associated with various public dockets, including: NP10-159; NP10-160; **NP11-1**; NP11-4; NP11-218; NP11-234; NP10-135; NP10-136; NP17-13; and NP17-26. Based on staff's internal assessment, disclosure of the UREs associated with these dockets is not appropriate. Accordingly, as discussed further below, the identities will be withheld pursuant to Exemption 3 and Exemption 7(F).

Identities of UREs

Before making a determination as to whether this information is appropriate for release under FOIA, a case-by-case assessment of the requested information must consider the following: the nature of the Critical Infrastructure Protection (CIP) violation, including whether there is a Technical Feasibility Exception involved that does not allow the Unidentified Registered Entity to fully meet the CIP requirements; whether vendor-related information is contained in the Notices of Penalty (NOP); whether mitigation is complete; the content of the public and non-public versions of the NOP; the extent to which the disclosure of the identity of the URE and other information would be useful to someone seeking to cause harm; whether a successful audit has occurred since the violation(s); whether the violation(s) was administrative or technical in nature; and the length of time that has elapsed since the filing of the public NOP. An application of these factors will dictate whether a particular FOIA exemption, including 7(F) and/or Exemption 3, is appropriate. *See Garcia v. U.S. DOJ*, 181 F. Supp. 2d 356, 378 (S.D.N.Y. 2002) (“In evaluating the validity of an agency's invocation of Exemption 7(F), the court should within limits, defer to the agency's assessment of danger.”) (citation and internal quotations omitted).

FOIA FY19-30

- 2 -

Based on the application of the various factors discussed above, I conclude that disclosing the identities of the UREs associated with these dockets, would create a risk of harm or detriment to life, physical safety, or security because the specified UREs could become the target of a potentially bad actor. Therefore, the information is protected from disclosure under FOIA Exemption 7(F). *See* 5 U.S.C. § 552(b)(7)(F) (protecting law enforcement information where release “could reasonably be expected to endanger the life or physical safety of any individual.”). Additionally, the information is protected under FOIA Exemption 3. *See* Fixing America's Surface Transportation Act, Pub. L. No. 114-94, § 61003 (2015) (specifically exempting the disclosure of CEII and establishing applicability of FOIA Exemption 3, 5 U.S.C. § 552(b)(3)). Accordingly, the names of the UREs associated with the foregoing dockets will not be disclosed.

On November 18, 2019, you filed suit in the U.S. District Court for the District of Columbia asserting claims in connection with this FOIA request. *See Mabee v. Fed. Energy Reg. Comm'n.*, Civil Action No. 19-3448 (KBJ) (D.D.C.). Because this FOIA request is currently in litigation, this letter does not contain information regarding administrative appeal of the response to the FOIA request.

For any further assistance or to discuss any aspect of your request, you may contact Assistant United States Attorney April D. Seabrook by email at april.seabrook@usdoj.gov, by phone at (202) 252-2525, or by mail at United States Attorney's Office – Civil Division, U.S. Department of Justice, 555 Fourth Street, N.W., Washington, D.C. 20530.

Sincerely,

LINDSEE Digitally signed by
LINDSEE GENTRY
GENTRY Date: 2021.01.29
16:19:47 -05'00'

Lindsee Gentry
Director
Office of External Affairs

FOIA FY19-30

- 3 -

Cc Mr. Peter Sorenson, Esq.
Counsel for Mr. Mabee
petesorenson@gmail.com

James M. McGrane
Senior Counsel
North American Electric Reliability Corporation
1325 G Street N.W. Suite 600
Washington, D.C. 20005
James.McGrane@nerc.net

Exhibit 109

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

FERC's February 26, 2021 denial letter.

Showing the denial of, among others, docket no. NP12-20-000.

Federal Energy Regulatory Commission
Washington, D.C. 20426

November 25, 2020

Re: FOIA FY19-30 (Rolling)
Fourteenth Response Letter –
Denial

VIA ELECTRONIC MAIL ONLY

Michael Mabee
6937 Nine Mile Bridge Road
Fort Worth, TX 76135
CivilDefenseBook@gmail.com

Dear Mr. Mabee:

This is a rolling response to your correspondence received on January 16, 2019, in which you requested information pursuant to the Freedom of Information Act (FOIA), and the Federal Energy Regulatory Commission's (Commission) FOIA regulations. *See* 5 U.S.C. § 552 (2018); 18 C.F.R. § 388.108 (2020). Your request is for the names of the Unidentified Registered Entities (UREs) associated with various public dockets, including: NP12-17; NP12-20; NP12-25; NP12-29; NP12-43; NP13-24; NP13-32; NP13-47; NP13-55; and NP14-5.¹ Based on staff's internal assessment, disclosure of the UREs associated with these dockets is not appropriate. Accordingly, as discussed further below, the identities will be withheld pursuant to Exemption 3 and Exemption 7(F).

Identities of UREs

Before making a determination as to whether this information is appropriate for release under FOIA, a case-by-case assessment of the requested information must consider the following: the nature of the Critical Infrastructure Protection (CIP) violation, including whether there is a Technical Feasibility Exception involved that does not allow the Unidentified Registered Entity to fully meet the CIP requirements; whether vendor-related information is contained in the Notices of Penalty (NOP); whether mitigation is complete; the content of the public and non-public versions of the NOP; the extent to which the disclosure of the identity of the URE and other information would be useful to someone seeking to cause harm; whether a successful audit has occurred since the violation(s); whether the violation(s) was administrative or technical in nature; and the length of time that has elapsed since the filing of the public NOP. An application of these

¹ As you are aware, given the volume of dockets in your request, this FOIA response will be processed on a rolling basis.

FOIA FY19-30

- 2 -

factors will dictate whether a particular FOIA exemption, including 7(F) and/or Exemption 3, is appropriate. *See Garcia v. U.S. DOJ*, 181 F. Supp. 2d 356, 378 (S.D.N.Y. 2002) (“In evaluating the validity of an agency's invocation of Exemption 7(F), the court should within limits, defer to the agency's assessment of danger.”) (citation and internal quotations omitted).

Based on the application of the various factors discussed above, I conclude that disclosing the identities of the UREs associated with these dockets, would create a risk of harm or detriment to life, physical safety, or security because the specified UREs could become the target of a potentially bad actor. Therefore, the information is protected from disclosure under FOIA Exemption 7(F). *See* 5 U.S.C. § 552(b)(7)(F) (protecting law enforcement information where release “could reasonably be expected to endanger the life or physical safety of any individual.”). Additionally, the information is protected under FOIA Exemption 3. *See* Fixing America's Surface Transportation Act, Pub. L. No. 114-94, § 61003 (2015) (specifically exempting the disclosure of CEII and establishing applicability of FOIA Exemption 3, 5 U.S.C. § 552(b)(3)). Accordingly, the names of the UREs associated with the foregoing dockets will not be disclosed.

On November 18, 2019, you filed suit in the U.S. District Court for the District of Columbia asserting claims in connection with this FOIA request. *See Mabee v. Fed. Energy Reg. Comm'n.*, Civil Action No. 19-3448 (KBJ) (D.D.C.). Because this FOIA request is currently in litigation, this letter does not contain information regarding administrative appeal of the response to the FOIA request.

For any further assistance or to discuss any aspect of your request, you may contact Assistant United States Attorney April D. Seabrook by email at april.seabrook@usdoj.gov, by phone at (202) 252-2525, or by mail at United States Attorney's Office – Civil Division, U.S. Department of Justice, 555 Fourth Street, N.W., Washington, D.C. 20530.

Sincerely,

LINDSEE
GENTRY

Digitally signed by
LINDSEE GENTRY
Date: 2020.11.25
14:41:24 -05'00'

Lindsee Gentry
Director
Office of External Affairs

FOIA FY19-30

- 3 -

Cc Mr. Peter Sorenson, Esq.
Counsel for Mr. Mabee
petesorenson@gmail.com

James M. McGrane
Senior Counsel
North American Electric Reliability Corporation
1325 G Street N.W. Suite 600
Washington, D.C. 20005
James.McGrane@nerc.net

Exhibit 110

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

FERC's August 2, 2018 release letter.

Showing the release of the name of the violator in docket no. NP18-7-000.

FEDERAL ENERGY REGULATORY COMMISSION

WASHINGTON, D. C. 20426

AUG - 2 2018

OFFICE OF THE GENERAL COUNSEL

Re: Freedom of Information Act
Appeal, FOIA No. FY18-75

VIA E-MAIL AND CERTIFIED MAIL

Michael Mabee (without enclosures)
8 Westgate Road
Mont Vernon, NH 03057
CivilDefenseBook@gmail.com

Dear Mr. Mabee:

This letter responds to your correspondence received on June 16, 2018, in which you appealed the May 25, 2018 denial of your request filed pursuant to the Freedom of Information Act (FOIA) and the Federal Energy Regulatory Commission's (Commission) FOIA regulations. 5 U.S.C. § 552, *as amended* by the FOIA Improvement Act of 2016, Pub. L. No. 114-185, 130 Stat. 538 (2016); 18 C.F.R. § 388.108 (2018).

On April 13, 2018, you requested the following:

1. correspondence between FERC and the North American Electric Reliability Corporation (NERC) identifying the 'Unidentified Registered Entity' described in the document: 'NERC Full Notice of Penalty regarding Unidentified Registered Entity' filed with FERC on February 28, 2018.¹
2. correspondence between FERC and NERC laying out any purported rationale for withholding the identity of the 'Unidentified Registered Entity' from public view.

On April 23, 2018, Commission staff notified NERC of your request and provided an opportunity to comment pursuant to 18 C.F.R. § 388.112. NERC submitted comments on April 30, 2018, objecting to "the FOIA Request because [FERC] has instructed NERC not to divulge the identity of entities that have violated NERC Critical Infrastructure Protection ('CIP') Reliability Standards." In support of the foregoing, NERC cited certain Commission orders.

¹ Your request was not construed to seek the February 28, 2018 NERC Full Notice of Penalty itself.

FOIA Appeal No. – FY18-75

- 2 -

On May 25, 2018, Leonard M. Tao, Director of the Office of External Affairs (Director), determined that the seven (7) responsive documents² were protected from disclosure in their entirety pursuant to FOIA Exemptions 3 and 7(F), and therefore, denied your request. By letter dated June 16, 2018, you appealed that determination. Specifically, you argue that you are not seeking Critical Energy/Electric Infrastructure Information (CEII) and that you “simply ask for disclosure of the identity of the ‘Unidentified Registered Entity’ [URE] and why this information has been withheld.”

FOIA Exemption 3 protects information “specifically exempted from disclosure by statute.” Here, CEII is specifically exempted from disclosure under the Fixing America’s Surface Transportation Act, Pub. L. No. 118-94, § 61003 (2015). I conclude that the responsive documents contain sensitive cyber security-related information that qualifies for protection as CEII, and thus, was appropriately withheld. *See* 18 C.F.R. § 388.113(c). FOIA Exemption 7(F), exempts “records or information compiled for law enforcement purposes” to the extent that release of such information “could reasonably be expected to endanger the life or physical safety of any individual.” *See* 5 U.S.C. § 552(b)(7)(F).³ In this regard, the requested documents contain information regarding cyber security and risks to the URE, as well the techniques used to resolve the incident and associated possible vulnerabilities, the disclosure of which could provide a potential bad actor with information that may assist it in targeting the entity for cyber intrusion attacks. *See Public Employees for Environmental Responsibility, U.S. Section, Int’l Boundary and Water Comm.*, 740 F.3d 195, 206 (D.C. Cir. 2014) (Exemption 7(F) protects “the many potential threats posed by the release of sensitive agency information.”). Therefore, the Director also correctly invoked FOIA Exemption 7(F) to withhold the relevant documents.

While it is possible that the name of a URE may constitute CEII under 18 C.F.R. 388.113 and qualify for protection under Exemption 7(F), under the circumstances and facts presented in this particular case, I conclude that the name of the URE can be disclosed. However, other information contained in the documents which I conclude should remain protected under Exemptions 3 and 7 has been redacted. Additionally, the names of lower-level employees have been redacted pursuant to FOIA Exemption 6. *See*

² These documents consist of various email correspondence between FERC and NERC regarding questions concerning details relative to the incident resulting in the Notice of Penalty.

³ I note that Exemption 7(F) applies to civil, as well as criminal law enforcement matters. *See Vento v. IRS*, 714 F. Supp. 2d 137, 148 (D.D.C. 2010) (holding that distinguishing between civil and criminal enforcement is incorrect because there “is no warrant in the law for that distinction and the federal courts have rejected it.”)

FOIA Appeal No. – FY18-75

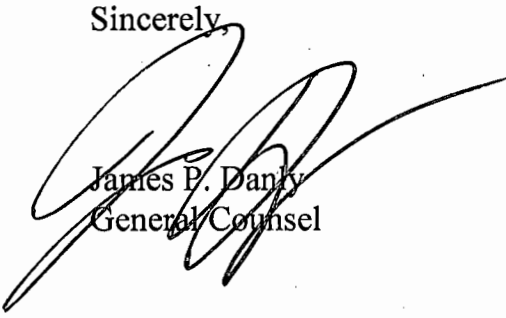
- 3 -

Judicial Watch, Inc. v. Bd. of Governors of Fed. Reserve System, 773 F. Supp. 2d 57, 62 (D.D.C. 2011); *see also Elec. Privacy Info. Ctr. v. Dep't of Homeland Sec.*, 384 F. Supp. 2d 100 (D.D.C. 2005) and *Cofield v. City of LaGrange, Ga.*, 913 F. Supp. 608, 616 (D.D.C. 1996).

Accordingly, your appeal is granted in part and denied in part. This letter also constitutes notice to NERC that this information will be made available to you no sooner than five (5) calendar days from the date of this letter. *See* 18 C.F.R. § 388.112(e).

Judicial review of this decision is available to you in the United States District Court for the judicial district in which you live, or in the United States District Court for the District of Columbia, which would be the location of the data that you seek. You may also seek mediation from the Office of Government Information Services (OGIS). Using OGIS services does not affect your right to pursue litigation. You may contact OGIS by mail at Office of Government Information Services, National Archives and Records Administration, Room 2510, 8601 Adelphi Road, College Park, MD 20740-6001; email at ogis@nara.gov; telephone at (301) 837-1996; facsimile at (301) 837-0348; or toll-free at 1-(877) 684-6448.

Sincerely,


James P. Dandy
General Counsel

Via Email

Edwin G. Kichline (with enclosures)
Senior Counsel and Director of
Enforcement Oversight
North American Electric Reliability Corporation
1325 G Street N.W. Suite 600
Washington, D.C. 20005
edwin.kichline@nerc.net

Exhibit 111

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

FERC's March 30, 2020 denial letter.

Showing denial of, among others, docket no. NP11-59-000

Federal Energy Regulatory Commission
Washington, D.C. 20426

March 30, 2020

Re: FOIA FY19-30 (Rolling)
Fifth Response Letter – Denial

VIA ELECTRONIC MAIL

Michael Mabee
8 Westgate Road
Mont Vernon, NH 03057
CivilDefenseBook@gmail.com

Dear Mr. Mabee:

This is a rolling response to your correspondence received on January 16, 2019, in which you requested information pursuant to the Freedom of Information Act (FOIA), and the Federal Energy Regulatory Commission's (Commission) FOIA regulations, 18 C.F.R. § 388.108 (2020). Your request is for the names of the UREs associated with various public dockets, including: NP11-21-000; NP11-22-000; NP11-56-000; NP11-59-000; NP11-63-000; NP11-64-000; NP11-70-000; NP11-72-000; NP11-76-000; NP11-79-000; and NP11-81-000.¹ Based on staff's internal assessment, disclosure of the UREs associated with these dockets is not appropriate. Accordingly, as discussed further below, the identities will be withheld pursuant to Exemption 3 and Exemption 7(F).

Identities of UREs

Before making a determination as to whether this information is appropriate for release under FOIA, a case-by-case assessment of the requested information must consider the following: the nature of the Critical Infrastructure Protection (CIP) violation, including whether there is a Technical Feasibility Exception involved that does not allow the Unidentified Registered Entity (URE) to fully meet the CIP requirements; whether vendor-related information is contained in the Notices of Penalty (NOP); whether mitigation is complete; the content of the public and non-public versions of the NOP; the extent to which the disclosure of the identity of the URE and other information would be useful to someone seeking to cause harm; whether a successful audit has occurred since the violation(s); whether the violation(s) was administrative or technical in nature; and the length of time that has elapsed since the filing of the public NOP. An application of these factors will dictate whether a particular FOIA exemption, including 7(F) and/or

¹ As you are aware, given the volume of dockets in your request, this FOIA response will be processed on a rolling basis.

FOIA FY19-30

- 2 -

Exemption 3, is appropriate. *See Garcia v. U.S. DOJ*, 181 F. Supp. 2d 356, 378 (S.D.N.Y. 2002) (“In evaluating the validity of an agency's invocation of Exemption 7(F), the court should within limits, defer to the agency's assessment of danger.”) (citation and internal quotations omitted).

Based on the application of the various factors discussed above, I conclude that disclosing the identity of the UREs associated with these dockets, would create a risk of harm or detriment to life, physical safety, or security because the specified UREs could become the target of a potentially bad actor. Therefore, the information is protected from disclosure under FOIA Exemption 7(F). *See* 5 U.S.C. § 552(b)(7)(F) (protecting law enforcement information where release “could reasonably be expected to endanger the life or physical safety of any individual.”). Additionally, the information is protected under FOIA Exemption 3. *See* the Fixing America's Surface Transportation Act, Pub. L. No. 114-94, § 61003 (2015) (specifically exempting the disclosure of CEII and establishing applicability of FOIA Exemption 3, 5 U.S.C. § 552(b)(3)). Accordingly, the names of the UREs associated with the foregoing dockets will not be disclosed.

On November 18, 2019, you filed suit in the U.S. District Court for the District of Columbia asserting claims in connection with this FOIA request. *See Mabee v. Fed. Energy Reg. Comm'n.*, Civil Action No. 19-3448 (KBJ) (D.D.C.). Because this FOIA request is currently in litigation, this letter does not contain information regarding administrative appeal of the response to the FOIA request.

For any further assistance or to discuss any aspect of your request, you may contact Assistant United States Attorney April Denise Seabrook by email at april.seabrook@usdoj.gov, by phone at (202) 252-2525, or by mail at United States Attorney's Office – Civil Division, U.S. Department of Justice, 555 Fourth Street, N.W., Washington, DC 20530.

Sincerely,

Lindsee Gentry
Director
Office of External Affairs

FOIA FY19-30

- 3 -

Cc Mr. Peter Sorenson, Esq.
Counsel for Mr. Mabee
petesorenson@gmail.com

Edwin G. Kichline
Senior Counsel and Director of Enforcement Oversight
North American Electric Reliability Corporation
1325 G Street N.W. Suite 600
Washington, D.C. 20005
edwin.kichline@nerc.net

Exhibit 112

To Declaration of Michael Mabee
Civil Action No. 19-3448 (FYP)

Description:

FERC's September 25, 2020 denial letter.

Showing FERC's denial of, among others, docket no. NP12-9-000

Federal Energy Regulatory Commission
Washington, D.C. 20426

September 25, 2020

Re: FOIA FY19-30 (Rolling)
Twelfth Response Letter – Denial

VIA ELECTRONIC MAIL ONLY

Michael Mabee
8 Westgate Road
Mont Vernon, NH 03057
CivilDefenseBook@gmail.com

Dear Mr. Mabee:

This is a rolling response to your correspondence received on January 16, 2019, in which you requested information pursuant to the Freedom of Information Act (FOIA), and the Federal Energy Regulatory Commission's (Commission) FOIA regulations. *See* 5 U.S.C. § 552 (2018); 18 C.F.R. § 388.108 (2020). Your request is for the names of the Unidentified Registered Entities (UREs) associated with various public dockets, including: NP11-237; NP12-3; NP12-4; NP12-9; NP12-11; NP13-11; NP13-16; NP13-18; NP13-19; NP13-22; and NP13-28.¹ Based on staff's internal assessment, disclosure of the UREs associated with these dockets is not appropriate. Accordingly, as discussed further below, the identities will be withheld pursuant to Exemption 3 and Exemption 7(F).

Identities of UREs

Before making a determination as to whether this information is appropriate for release under FOIA, a case-by-case assessment of the requested information must consider the following: the nature of the Critical Infrastructure Protection (CIP) violation, including whether there is a Technical Feasibility Exception involved that does not allow the Unidentified Registered Entity to fully meet the CIP requirements; whether vendor-related information is contained in the Notices of Penalty (NOP); whether mitigation is complete; the content of the public and non-public versions of the NOP; the extent to which the disclosure of the identity of the URE and other information would be useful to someone seeking to cause harm; whether a successful audit has occurred since the violation(s); whether the violation(s) was administrative or technical in nature; and the

¹ As you are aware, given the volume of dockets in your request, this FOIA response will be processed on a rolling basis.

FOIA FY19-30

- 2 -

length of time that has elapsed since the filing of the public NOP. An application of these factors will dictate whether a particular FOIA exemption, including 7(F) and/or Exemption 3, is appropriate. *See Garcia v. U.S. DOJ*, 181 F. Supp. 2d 356, 378 (S.D.N.Y. 2002) (“In evaluating the validity of an agency's invocation of Exemption 7(F), the court should within limits, defer to the agency's assessment of danger.”) (citation and internal quotations omitted).

Based on the application of the various factors discussed above, I conclude that disclosing the identities of the UREs associated with these dockets, would create a risk of harm or detriment to life, physical safety, or security because the specified UREs could become the target of a potentially bad actor. Therefore, the information is protected from disclosure under FOIA Exemption 7(F). *See* 5 U.S.C. § 552(b)(7)(F) (protecting law enforcement information where release “could reasonably be expected to endanger the life or physical safety of any individual.”). Additionally, the information is protected under FOIA Exemption 3. *See* Fixing America's Surface Transportation Act, Pub. L. No. 114-94, § 61003 (2015) (specifically exempting the disclosure of CEII and establishing applicability of FOIA Exemption 3, 5 U.S.C. § 552(b)(3)). Accordingly, the names of the UREs associated with the foregoing dockets will not be disclosed.

On November 18, 2019, you filed suit in the U.S. District Court for the District of Columbia asserting claims in connection with this FOIA request. *See Mabee v. Fed. Energy Reg. Comm'n.*, Civil Action No. 19-3448 (KBJ) (D.D.C.). Because this FOIA request is currently in litigation, this letter does not contain information regarding administrative appeal of the response to the FOIA request.

For any further assistance or to discuss any aspect of your request, you may contact Assistant United States Attorney April D. Seabrook by email at april.seabrook@usdoj.gov, by phone at (202) 252-2525, or by mail at United States Attorney's Office – Civil Division, U.S. Department of Justice, 555 Fourth Street, N.W., Washington, D.C. 20530.

Sincerely,

LINDSEE
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LINDSEE GENTRY
Date: 2020.09.25
17:08:51 -04'00'

Lindsee Gentry
Director
Office of External Affairs

FOIA FY19-30

- 3 -

Cc Mr. Peter Sorenson, Esq.
Counsel for Mr. Mabee
petesorenson@gmail.com

Sônia Mendonça
Senior Vice President, General Counsel, and Corporate Secretary
North American Electric Reliability Corporation
1325 G Street N.W. Suite 600
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Sonia.mendonca@nerc.net

Edwin G. Kichline
Senior Counsel and Director of Enforcement Oversight
North American Electric Reliability Corporation
1325 G Street N.W. Suite 600
Washington, D.C. 20005
edwin.kichline@nerc.net

Exhibit 113

To Declaration of Michael Mabee

Description:

Excerpts from NP10-160-000 NOP, FERC No Further Review Letter & FOIA denial letter.

Mitigation dates are highlighted in the NOP.

Note: For brevity, Exhibits 113-116 contain excerpts of the public Notices of Penalty. However, the expert witnesses reviewed the full and complete version of the Notices of Penalty represented by these exhibits. The full public Notice of Penalties for these four dockets are available on FERC's website

(<https://elibrary.ferc.gov/eLibrary/search>) by searching for either the docket numbers or for the Accession Numbers: NP10-160-000: Accession Number 20100913-5034; NP10-135-000: Accession Number 20100706-5172; NP18-7-000: Accession Number 20180228-5108; and NP18-14-000: Accession Number 20180531-5251.



September 13, 2010

Ms. Kimberly Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: NERC Omnibus II Notice of Penalty
FERC Docket No. NP10-__-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this second Omnibus Notice of Penalty¹ (Omnibus II NOP) regarding 20 Registered Entities² listed in Attachment A,³ in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations and orders, as well as NERC Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).⁴

The Registered Entities identified in Attachment A are located within the footprints of three of the eight NERC Regional Entities, including Southwest Power Pool Regional Entity (SPP RE), Texas Reliability Entity (Texas RE) and Western Electricity Coordinating Council (WECC) (Three Regional Entities). In addition, violations⁵ that were incurred by three former WECC Reliability Coordinators (RC) and were processed by NERC as the Compliance Enforcement Authority (NCEA) are included in this Omnibus II filing.⁶ The three former WECC RCs are identified in Attachment A.

¹ *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards* (Order No. 672), III FERC Stats. & Regs. ¶ 31,204 (2006); *Notice of New Docket Prefix "NP" for Notices of Penalty Filed by the North American Electric Reliability Corporation*, Docket No. RM05-30-000 (February 7, 2008). *See also* 18 C.F.R. Part 39 (2010). *Mandatory Reliability Standards for the Bulk-Power System*, FERC Stats. & Regs. ¶ 31,242 (2007) (Order No. 693), *reh'g denied*, 120 FERC ¶ 61,053 (2007) (Order No. 693-A). *See* 18 C.F.R. § 39.7(c)(2). *See also* *Notice of No Further Review and Guidance Order*, 132 FERC ¶ 61,182 (2010).

² Corresponding NERC Registry ID Numbers for each Registered Entity are identified in Attachment A.

³ Attachment A is an excel spreadsheet which consists of four tabs for the respective three Regional Entities and the NERC Compliance Enforcement Authority (NCEA) participating in this filing.

⁴ *See* 18 C.F.R. § 39.7(c)(2).

⁵ For purposes of this document, the violations at issue are described as "violations," regardless of their procedural posture and whether they were possible, alleged, or confirmed violations.

⁶ WECC RC accepted the disposition of these violations on behalf of the three former entities.

116-390 Village Blvd.
Princeton, NJ 08540
609.452.8060 | www.nerc.com

NERC Omnibus II Notice of Penalty

September 13, 2010

Page 7

- Seventh, the Three Regional Entities and NCEA considered the violation time horizon and concluded the possible violations were appropriate for inclusion in this Omnibus II NOP.
- Eighth, the Three Regional Entities and NCEA considered whether there was a the failure of the Registered Entity to comply with compliance directives or to timely complete Mitigation Plans for pre- and post-June 18, 2007 violations.
- Ninth, in all cases, the Three Regional Entities and NCEA did not find any attempt by a Registered Entity to conceal the violation or information needed to investigate the violation.
- Tenth, the Three Regional Entities and NCEA did not find evidence of any intentional violations.
- Finally, the Three Regional Entities and NCEA have taken into consideration a Registered Entity's ability to pay a penalty and the dissolution of the three former WECC Reliability Coordinators.

As a result, penalties were assessed accordingly and are reflected in Attachment A. Of the 62 violations addressed in this Omnibus II NOP, only one (1) has a financial penalty of (\$35,000).

Status of Mitigation Plan¹³

The status of each Mitigation Plan to address the possible violations is identified in Attachment A. The Mitigation Plans have all been accepted by the Regional Entity or NCEA and approved by NERC. The Mitigation Plan number for each possible violation is identified in Attachment A, and each Mitigation Plan has been submitted to FERC as non-public information in accordance with FERC orders.

Information also is provided regarding the dates of a Registered Entity's certification of completion of its Mitigation Plan and Regional Entity verification of such completion. As evidence of completion of its Mitigation Plan, each Registered Entity, or WECC RC in the case of the NCEA-processed violations, submitted a signed, formal document and procedure assigning and identifying a senior manager by name, title, business address and date of designation as required.

Statement Describing the Proposed Penalty, Sanction or Enforcement Action Imposed¹⁴

Basis for Determination

Taking into consideration the Commission's direction in Order No. 693, the NERC Sanction Guidelines and the Commission's July 3, 2008 Guidance Order, the October 26, 2009 Guidance

¹³ See 18 C.F.R. § 39.7(d)(7).

¹⁴ See 18 C.F.R. § 39.7(d)(4).



October 8, 2010

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Re: NERC Notice of Penalty regarding Omnibus II, FERC Docket No. NP10-160-000

Dear Ms. Bose:

The North American Electric Reliability Corporation (“NERC”) respectfully submits this supplemental information to the Federal Energy Regulatory Commission (“FERC” or the “Commission”) regarding the Western Electricity Coordinating Council Reliability Coordinator violations that were included in the September 13, 2010 Omnibus II filing under the name of NERC as Compliance Enforcement Authority (“CEA”) in the above referenced proceeding.¹

Specifically, the instant filing provides additional information regarding the risk to the bulk power system during the pendency of the violation up to and including mitigation of the violation. The new additional text is denoted by red font.

Accordingly, NERC respectfully requests that the Commission accept this response and issue an order consistent with the comments provided herein.

Respectfully submitted,

/s/ Rebecca J. Michael

Rebecca J. Michael

*Attorney for North American Electric
Reliability Corporation*

cc: Official service list in Docket No. NP10-160-000

¹ The three WECC Reliability Coordinators (WECC RCs) that became the NERC as CEA entity are the following: WECC RC – Pacific Northwest Security Coordinator, WECC RC – California Mexico Reliability Coordinator OC, and WECC RC – Rocky Mountain – Desert Southwest Reliability.

ATTACHMENT A - OMNIBUS II SPREADSHEET

| | A | B | C | D | E | F | G | H | I | J | K | L | M | N | O | P | Q | R | S | T | U | V | W |
|----|--------|--------------------------------------|--------|---------------------|-----------|--|--|--|----------------------|------|-------------------------------|-----------------------|--|----------------------|--------------------|--------------------------------|---|------------------------|---------------------------|---|--|--------------------|--------------------------------|
| | Region | Registered Entity | NOC-ID | NERC Violation ID # | NCR_ID | Date Identified or Received (Pre-June 18 Violation)* *if applicable | Date Identified or Received (Post-June 18 Violation) | Description of the Violation | Reliability Standard | Req. | Regional Reliability Standard | Violation Risk Factor | Risk Assessment | Violation Start Date | Violation End Date | Total Penalty or Sanction (\$) | Basis for the Penalty | Mitigation Plan Number | Mitigation Plan Completed | Registered Entity Certification of Mitigation Plan Completion | Regional Entity Verification of Mitigation Plan Completion | Discovery Method | Prior Violation Filing Dockets |
| 1 | | | | | | | | | | | | | | | | | | | | | | | |
| | WECC | USACE-Portland District | 519 | WECC200801718 | NCR05538 | | 6/30/2008 | USACE-Portland District did not include all applicable Protection System devices, specifically voltage and current sensing devices and DC control circuitry, in its maintenance and testing program and therefore was not conducting the testing of the missing devices. | PRC-005-1 | 2 | | Lower / High | WECC determined that the violation did not constitute a serious or substantial risk to the bulk power system because USACE-Portland District had a Protection System Maintenance and Testing Program, and USACE-Portland District's maintenance and testing program included protective relays, associated communication systems, and station batteries. | 8/10/2007 | 12/31/2008 | \$0 | The violation did not pose serious or substantial risk to the bulk power system. As explained in the cover NOP, WECC considered that USACE-Portland District had a separate prior violation of this Reliability Standard. | MIT-08-2126 | 12/31/2008 | 12/31/2008 | 11/11/2009 | Self-Certification | NP10-2-000 |
| 24 | WECC | USACE-Seattle District | 520 | WECC200801190 | NCR05539 | | 6/30/2008 | USACE-Seattle District did not have procedures for the recognition of and for making its operating personnel aware of sabotage events on its facilities, as required by the Reliability Standard. | CIP-001-1 | 1 | | Medium | WECC determined that the violation did not constitute a serious or substantial risk to the bulk power system because 1) USACE has a set of emergency plans and physical security procedures that cover sabotage generally, 2) of the nature and the location of USACE-Seattle District's assets, and 3) the violation was a documentation issue. | 8/10/2007 | 10/8/2008 | \$0 | The violation was a documentation issue, it was the first violation of this Reliability Standard incurred by USACE-Seattle District and it did not constitute a serious or substantial risk to the bulk power system. | MIT-08-1215 | 10/8/2008 | 12/31/2008 | 8/28/2009 | Self-Certification | NP10-2-000 |
| 25 | WECC | USACE-Seattle District | 520 | WECC200801191 | NCR05539 | | 6/30/2008 | USACE-Seattle District did not provide its operating personnel with sabotage response guidelines, including personnel to contact for reporting disturbances due to sabotage events. | CIP-001-1 | 3 | | Medium | WECC determined that the violation did not constitute a serious or substantial risk to the bulk power system because 1) USACE has a set of emergency plans and physical security procedures that cover sabotage generally and 2) of the nature and the location of USACE-Seattle District's assets and the documentation nature of the violation. | 8/10/2007 | 10/8/2008 | \$0 | The violation was the first violation of this Reliability Standard incurred by USACE-Seattle District and it did not constitute a serious or substantial risk to the bulk power system. | MIT-08-1215 | 10/8/2008 | 12/31/2008 | 8/28/2009 | Self-Certification | NP10-2-000 |
| 26 | WECC | USACE-Seattle District | 520 | WECC200801192 | NCR05539 | | 6/30/2008 | USACE-Seattle District did not establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) officials and did not develop reporting procedures as appropriate to the circumstances. | CIP-001-1 | 4 | | Medium | WECC determined that the violation did not constitute a serious or substantial risk to the bulk power system because 1) USACE has a set of emergency plans and physical security procedures that cover sabotage generally and 2) of the nature and the location of USACE-Seattle District's assets and the documentation nature of the violation. | 8/10/2007 | 10/8/2008 | \$0 | The violation was the first violation of this Reliability Standard incurred by USACE-Seattle District and it did not constitute a serious or substantial risk to the bulk power system. | MIT-08-1215 | 10/8/2008 | 12/31/2008 | 8/28/2009 | Self-Certification | NP10-2-000 |
| 27 | WECC | Unidentified Registered Entity (URE) | 511 | WECC200800XXX | NCRXXXX X | | 6/30/2008 | URE did not have test procedures for two Critical Cyber Assets, URE's Energy Control Center and Backup Energy Control Center. URE's test methodology did not outline baseline production and development parameters and URE could not demonstrate that its testing procedure minimized adverse effects on URE's production system or its operations. URE did not document that it conducted its testing in a manner that reflected URE's production environment and URE did not document all test results. | CIP-007-1 | 1 | | Medium / Lower | WECC determined that the violation did not constitute a serious or substantial risk to the bulk power system because procedures existed, even though the procedures did not include all of the elements required by the Standard. | 7/1/2008 | 10/15/2009 | \$0 | The violation was self-reported, it was a documentation issue, it was the first violation of this Reliability Standard incurred by URE and it did not constitute a serious or substantial risk to the bulk power system. URE did not complete its original Mitigation Plan by the approved 6/12/2009 completion date. WECC approved the 9/4/2009 revised Mitigation Plan that was completed on 10/15/2009. WECC considered these factors and determined that, notwithstanding the late completion of the Mitigation Plan, a zero dollar penalty was appropriate for this violation. | MIT-08-1453 | 10/15/2009 | 10/15/2009 | 11/11/2009 | Self-Report | NP10-2-000 |
| 28 | WECC | Unidentified Registered Entity (URE) | N/A | WECC200800XXX | NCRXXXX X | | 6/30/2008 | URE's Cyber Security Policy did not address all the requirements in Standards CIP-002 through CIP-009. | CIP-003-1 | 1 | | Lower | WECC determined that the violation did not constitute a serious or substantial risk to the bulk power system because URE had a Cyber Security Policy but did not have all required elements. | 7/1/2008 | 10/16/2009 | \$0 | The violation was self-reported, it was the first violation of this Reliability Standard incurred by URE and it did not constitute a serious or substantial risk to the bulk power system. WECC rejected URE's 6/12/2009 Certification of Completion. WECC approved URE's 9/4/2009 revised Mitigation Plan that was completed on 10/15/2009. WECC considered these factors and determined that, notwithstanding the late completion of the Mitigation Plan, a zero dollar penalty was appropriate for this violation. | MIT-08-1452 | 10/16/2009 | 10/16/2009 | 11/11/2009 | Self-Report | NP10-2-000 |
| 29 | | | | | | | | | | | | | | | | | | | | | | | |

133 FERC ¶ 61,036
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation

Docket No. NP10-160-000

NOTICE

(October 13, 2010)

Take notice that the Commission will not further review, on its own motion, the Notice of Penalty in Docket No. NP10-160-00 as to the following Registered Entities:

Black Hills/Colorado Electric Utility Company, LP
California Department of Water Resources
City of Forest Grove Light and Power
City of Ukiah
Imperial Irrigation District
National Nuclear Security Administration - Los Alamos National Laboratory
Navopache Electric Cooperative, Inc.
Public Service Company of New Mexico
Sacramento Municipal Utility District
Southern Nevada Water Authority
TransAlta Centralia Generation, LLC
Tri-Dam Project of the Oakdale and South Joaquin Irrigation Districts
United State Army Corps of Engineers, Portland District
United States Army Corps of Engineers, Seattle District
Unidentified Registered Entity
WECC RC [California/Mexico Reliability Coordinator]
WECC RC [Pacific Northwest Security Coordinator]
WECC RC [Rocky Mountain Desert Southwest Reliability Coordinator]

By direction of the Commission.

Nathaniel J. Davis, Sr.,
Deputy Secretary.

Federal Energy Regulatory Commission
Washington, D.C. 20426
January 29, 2021

Re: FOIA FY19-30 and FOIA
FY19-19 (Rolling)
Response Letter – Denial

VIA ELECTRONIC MAIL ONLY

Michael Mabee
6937 Nine Mile Bridge Road
Fort Worth, TX 76135
CivilDefenseBook@gmail.com

Dear Mr. Mabee:

This is a rolling response to your correspondence received in January 2019, in which you requested information pursuant to the Freedom of Information Act (FOIA), and the Federal Energy Regulatory Commission's (Commission) FOIA regulations. *See* 5 U.S.C. § 552 (2018); 18 C.F.R. § 388.108 (2020). Your request is for the names of the Unidentified Registered Entities (UREs) associated with various public dockets, including: NP10-159; NP10-160; NP11-1; NP11-4; NP11-218; NP11-234; NP10-135; NP10-136; NP17-13; and NP17-26. Based on staff's internal assessment, disclosure of the UREs associated with these dockets is not appropriate. Accordingly, as discussed further below, the identities will be withheld pursuant to Exemption 3 and Exemption 7(F).

Identities of UREs

Before making a determination as to whether this information is appropriate for release under FOIA, a case-by-case assessment of the requested information must consider the following: the nature of the Critical Infrastructure Protection (CIP) violation, including whether there is a Technical Feasibility Exception involved that does not allow the Unidentified Registered Entity to fully meet the CIP requirements; whether vendor-related information is contained in the Notices of Penalty (NOP); whether mitigation is complete; the content of the public and non-public versions of the NOP; the extent to which the disclosure of the identity of the URE and other information would be useful to someone seeking to cause harm; whether a successful audit has occurred since the violation(s); whether the violation(s) was administrative or technical in nature; and the length of time that has elapsed since the filing of the public NOP. An application of these factors will dictate whether a particular FOIA exemption, including 7(F) and/or Exemption 3, is appropriate. *See Garcia v. U.S. DOJ*, 181 F. Supp. 2d 356, 378 (S.D.N.Y. 2002) (“In evaluating the validity of an agency's invocation of Exemption 7(F), the court should within limits, defer to the agency's assessment of danger.”) (citation and internal quotations omitted).

FOIA FY19-30

- 2 -

Based on the application of the various factors discussed above, I conclude that disclosing the identities of the UREs associated with these dockets, would create a risk of harm or detriment to life, physical safety, or security because the specified UREs could become the target of a potentially bad actor. Therefore, the information is protected from disclosure under FOIA Exemption 7(F). *See* 5 U.S.C. § 552(b)(7)(F) (protecting law enforcement information where release “could reasonably be expected to endanger the life or physical safety of any individual.”). Additionally, the information is protected under FOIA Exemption 3. *See* Fixing America's Surface Transportation Act, Pub. L. No. 114-94, § 61003 (2015) (specifically exempting the disclosure of CEII and establishing applicability of FOIA Exemption 3, 5 U.S.C. § 552(b)(3)). Accordingly, the names of the UREs associated with the foregoing dockets will not be disclosed.

On November 18, 2019, you filed suit in the U.S. District Court for the District of Columbia asserting claims in connection with this FOIA request. *See Mabee v. Fed. Energy Reg. Comm'n.*, Civil Action No. 19-3448 (KBJ) (D.D.C.). Because this FOIA request is currently in litigation, this letter does not contain information regarding administrative appeal of the response to the FOIA request.

For any further assistance or to discuss any aspect of your request, you may contact Assistant United States Attorney April D. Seabrook by email at april.seabrook@usdoj.gov, by phone at (202) 252-2525, or by mail at United States Attorney's Office – Civil Division, U.S. Department of Justice, 555 Fourth Street, N.W., Washington, D.C. 20530.

Sincerely,

LINDSEE Digitally signed by
LINDSEE GENTRY
GENTRY Date: 2021.01.29
16:19:47 -05'00'

Lindsee Gentry
Director
Office of External Affairs

FOIA FY19-30

- 3 -

Cc Mr. Peter Sorenson, Esq.
Counsel for Mr. Mabee
petesorenson@gmail.com

James M. McGrane
Senior Counsel
North American Electric Reliability Corporation
1325 G Street N.W. Suite 600
Washington, D.C. 20005
James.McGrane@nerc.net

Exhibit 114

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

Excerpts from NP10-135-000 NOP, FERC No Further Review Letter & FOIA denial letter.

Mitigation dates are highlighted in the NOP.

Note: For brevity, Exhibits 113-116 contain excerpts of the public Notices of Penalty. However, the expert witnesses reviewed the full and complete version of the Notices of Penalty represented by these exhibits. The full public Notice of Penalties for these four dockets are available on FERC's website

(<https://elibrary.ferc.gov/eLibrary/search>) by searching for either the docket numbers or for the Accession Numbers: NP10-160-000: Accession Number 20100913-5034; NP10-135-000: Accession Number 20100706-5172; NP18-7-000: Accession Number 20180228-5108; and NP18-14-000: Accession Number 20180531-5251.



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

PRIVILEGED AND CONFIDENTIAL INFORMATION
HAS BEEN REMOVED FROM THIS PUBLIC VERSION

July 6, 2010

Ms. Kimberly Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: NERC Notice of Penalty,
FERC Docket No. NP10-_-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Notice of Penalty,¹ which includes one (1) Non-Public Exhibit pertaining to a NERC Registered Entity. The Notice of Penalty set forth in the Non-Public Exhibit contains, in whole or in part, violations of the CIP-002 through CIP-009 Reliability Standards that were resolved by Settlement Agreement. The Registered Entity does not dispute the violation and the penalty. This filing is submitted in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations and orders, as well as NERC Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).²

The Non-Public Exhibit identifies the Reliability Standards at issue, the basis for the violation and the impact to reliability, and the ultimate disposition. A summary is set forth below:

¹ *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards* (Order No. 672), III FERC Stats. & Regs. ¶ 31,204 (2006); *Notice of New Docket Prefix "NP" for Notices of Penalty Filed by the North American Electric Reliability Corporation*, Docket No. RM05-30-000 (February 7, 2008). *See also* 18 C.F.R. Part 39 (2008). *Mandatory Reliability Standards for the Bulk-Power System*, FERC Stats. & Regs. ¶ 31,242 (2007) (Order No. 693), *reh'g denied*, 120 FERC ¶ 61,053 (2007) (Order No. 693-A). *See* 18 C.F.R. § 39.7(c)(2).

² *See* 18 C.F.R. § 39.7(c)(2).

NERC Notice of Penalty
July 6, 2010
Page 2

**PRIVILEGED AND CONFIDENTIAL INFORMATION
HAS BEEN REMOVED FROM THIS PUBLIC VERSION**

| NERC Violation ID* | Reliability Std. | Req. (R) | Approved VRF | Basis for Violation | Total Penalty (\$) |
|--------------------|------------------|----------|--------------|---|--------------------|
| WECC200901701 | CIP-005-1 | 2 | Medium | <p>The Registered Entity's unrestricted firewall access on the first connection to the Electronic Security Perimeter did not follow an access control model that denied access by default. The Registered Entity's direct outside connection on the second connection was a failure to only enable ports within the Electronic Security Perimeter.</p> <p>The Registered Entity mitigated this violation by correcting: (i) the rule set on the firewall for the two outbound circuits at issue; and (ii) the cabling error that connected the Critical Cyber Asset servers to an outbound node. Actions taken included reconnecting these two circuits through a proper Electronic Security Perimeter border firewall and configuring the necessary firewall rule sets to appropriately restrict access.</p> | 8,000 |

*Due to the confidential nature of the CIP-002 through CIP-009 violations, the Registered Entity's name is not identified.

Request for Confidential Treatment

Information in and certain attachments to the instant Notice of Penalty include privileged and confidential information as defined by the Commission's regulations at 18 C.F.R. Part 388 and orders, as well as NERC Rules of Procedure including the NERC CMEP Appendix 4C. Specifically, this includes non-public information related to certain Reliability Standard violations, certain Regional Entity investigative files, Registered Entity sensitive business and confidential information exempt from the mandatory public disclosure requirements of the Freedom of Information Act, 5 U.S.C. 552, and should be withheld from public disclosure.

In accordance with the Commission's Rules of Practice and Procedure, 18 C.F.R. § 388.112, a non-public version of the information redacted from the public filing is being provided under separate cover.

Because certain of the attached documents are deemed "confidential" by NERC, Registered Entities and Regional Entities, NERC requests that the confidential, non-public information be provided special treatment in accordance with the above regulation.

NERC Notice of Penalty
July 6, 2010
Page 3

**PRIVILEGED AND CONFIDENTIAL INFORMATION
HAS BEEN REMOVED FROM THIS PUBLIC VERSION**

Notices and Communications

Notices and communications with respect to this filing may be addressed to the following:

| | |
|--|--|
| <p>Gerald W. Cauley President and Chief Executive Officer David N. Cook* Vice President and General Counsel North American Electric Reliability Corporation 116-390 Village Boulevard Princeton, New Jersey 08540-5721 (609)452-8060 (609) 452-9550 – facsimile gerry.cauley@nerc.net david.cook@nerc.net</p> <p>Christopher Luras* Manager of Compliance Enforcement Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6887 (801) 883-6894 – facsimile CLuras@wecc.biz</p> <p>Steven Goodwill* General Counsel Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6857 (801) 883-6894 – facsimile SGoodwill@wecc.biz</p> <p>*Persons to be included on the Commission's service list are indicated with an asterisk. NERC requests waiver of the Commission's rules and regulations to permit the inclusion of more than two people on the service list.</p> | <p>Rebecca J. Michael* Assistant General Counsel Holly A Hawkins* Attorney V. Davis Smith* Attorney (admitted in IN; not admitted in D.C. or NJ) North American Electric Reliability Corporation 1120 G Street, N.W. Suite 990 Washington, D.C. 20005-3801 (202) 393-3998 (202) 393-3955 – facsimile rebecca.michael@nerc.net holly.hawkins@nerc.net davis.smith@nerc.net</p> <p>Louise McCarren* Chief Executive Officer Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6868 (801) 582-3918 – facsimile Louise@wecc.biz</p> <p>Constance White* Vice President of Compliance Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6885 (801) 883-6894 – facsimile CWhite@wecc.biz</p> |
|--|--|

NERC Notice of Penalty
July 6, 2010
Page 4

**PRIVILEGED AND CONFIDENTIAL INFORMATION
HAS BEEN REMOVED FROM THIS PUBLIC VERSION**

Conclusion

NERC respectfully requests that the Commission accept this Notice of Penalty as compliant with its rules, regulations and orders.

Respectfully submitted,

/s/ Rebecca J. Michael

Gerald W. Cauley
President and Chief Executive Officer
David N. Cook
Vice President and General Counsel
North American Electric Reliability Corporation
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Rebecca J. Michael
Assistant General Counsel
Holly A. Hawkins
Attorney
V. Davis Smith
Attorney (admitted in IN;
not admitted in D.C. or NJ)
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holly.hawkins@nerc.net
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UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation

Docket Nos. NP10-119-000
NP10-120-000
NP10-121-000
NP10-122-000
NP10-123-000
NP10-124-000
NP10-125-000
NP10-126-000
NP10-127-000
NP10-128-000
NP10-129-000
NP10-130-000
NP10-131-000
NP10-132-000
NP10-133-000
NP10-134-000
NP10-135-000
NP10-136-000
NP10-137-000
NP10-138-000
NP10-139-000
NP10-142-000

NOTICE

(August 5, 2010)

Take notice that the Commission will not further review, on its own motion, the following Notices of Penalty:¹

¹ The Secretary is issuing this notice as to Docket Nos. NP10-121-000, NP10-123-000, NP10-130-000, and NP10-134-000 pursuant to authority the Commission delegated in Order No. 728. *See Delegations for Notices of Penalty*, FERC Stats. & Regs. ¶ 31,298 (2009). Pursuant to sections 375.311(u) and (v) of the Commission's regulations, 18 C.F.R. §§ 375.311(u) and (v) (2010), by separate order the Director of the Office of Enforcement is extending the time period for the Commission's consideration of Docket Nos. NP10-140-000 and NP10-141-000 for the purpose of directing NERC and the Regional Entities to provide further information for our consideration.

Docket No. NP10-119-000, *et al.*

2

| <u>Docket No.</u> | <u>Filing Date</u> | <u>Registered Entity</u> |
|-------------------|--------------------|--|
| NP10-119-000 | July 6, 2010 | Citizens Electric Corporation |
| NP10-120-000 | July 6, 2010 | E.ON U.S. Services Inc. |
| NP10-121-000 | July 6, 2010 | Reedy Creek Improvement District |
| NP10-122-000 | July 6, 2010 | The Empire District Electric Company |
| NP10-123-000 | July 6, 2010 | Board of Public Utilities, City of McPherson, Kansas |
| NP10-124-000 | July 6, 2010 | Elk Hills Power, LLC |
| NP10-125-000 | July 6, 2010 | Covanta York Renewable Energy, LLC |
| NP10-126-000 | July 6, 2010 | Lincoln Generating Facility, LLC |
| NP10-127-000 | July 6, 2010 | SRW Cogeneration Limited Partnership |
| NP10-128-000 | July 6, 2010 | National Grid Generation, LLC |
| NP10-129-000 | July 6, 2010 | Benton County Wind Farm, LLC |
| NP10-130-000 | July 6, 2010 | Unidentified Registered Entity |
| NP10-131-000 | July 6, 2010 | Unidentified Registered Entity |
| NP10-132-000 | July 6, 2010 | Camp Grove Wind Farm, LLC |
| NP10-133-000 | July 6, 2010 | Hermiston Generating Co., L.P. |
| NP10-134-000 | July 6, 2010 | Unidentified Registered Entity |
| NP10-135-000 | July 6, 2010 | Unidentified Registered Entity |
| NP10-136-000 | July 6, 2010 | Unidentified Registered Entity |
| NP10-137-000 | July 6, 2010 | Unidentified Registered Entity |
| NP10-138-000 | July 6, 2010 | Unidentified Registered Entity |

Docket No. NP10-119-000, *et al.*

3

NP10-139-000 July 6, 2010

Unidentified Registered Entity

NP10-142-000 July 6, 2010

NAES Corporation – Lincoln Generating
Facility

By direction of the Commission.

Nathaniel J. Davis, Sr.,
Deputy Secretary.

Federal Energy Regulatory Commission
Washington, D.C. 20426
January 29, 2021

Re: FOIA FY19-30 and FOIA
FY19-19 (Rolling)
Response Letter – Denial

VIA ELECTRONIC MAIL ONLY

Michael Mabee
6937 Nine Mile Bridge Road
Fort Worth, TX 76135
CivilDefenseBook@gmail.com

Dear Mr. Mabee:

This is a rolling response to your correspondence received in January 2019, in which you requested information pursuant to the Freedom of Information Act (FOIA), and the Federal Energy Regulatory Commission's (Commission) FOIA regulations. *See* 5 U.S.C. § 552 (2018); 18 C.F.R. § 388.108 (2020). Your request is for the names of the Unidentified Registered Entities (UREs) associated with various public dockets, including: NP10-159; NP10-160; NP11-1; NP11-4; NP11-218; NP11-234; NP10-135; NP10-136; NP17-13; and NP17-26. Based on staff's internal assessment, disclosure of the UREs associated with these dockets is not appropriate. Accordingly, as discussed further below, the identities will be withheld pursuant to Exemption 3 and Exemption 7(F).

Identities of UREs

Before making a determination as to whether this information is appropriate for release under FOIA, a case-by-case assessment of the requested information must consider the following: the nature of the Critical Infrastructure Protection (CIP) violation, including whether there is a Technical Feasibility Exception involved that does not allow the Unidentified Registered Entity to fully meet the CIP requirements; whether vendor-related information is contained in the Notices of Penalty (NOP); whether mitigation is complete; the content of the public and non-public versions of the NOP; the extent to which the disclosure of the identity of the URE and other information would be useful to someone seeking to cause harm; whether a successful audit has occurred since the violation(s); whether the violation(s) was administrative or technical in nature; and the length of time that has elapsed since the filing of the public NOP. An application of these factors will dictate whether a particular FOIA exemption, including 7(F) and/or Exemption 3, is appropriate. *See Garcia v. U.S. DOJ*, 181 F. Supp. 2d 356, 378 (S.D.N.Y. 2002) ("In evaluating the validity of an agency's invocation of Exemption 7(F), the court should within limits, defer to the agency's assessment of danger.") (citation and internal quotations omitted).

FOIA FY19-30

- 2 -

Based on the application of the various factors discussed above, I conclude that disclosing the identities of the UREs associated with these dockets, would create a risk of harm or detriment to life, physical safety, or security because the specified UREs could become the target of a potentially bad actor. Therefore, the information is protected from disclosure under FOIA Exemption 7(F). *See* 5 U.S.C. § 552(b)(7)(F) (protecting law enforcement information where release “could reasonably be expected to endanger the life or physical safety of any individual.”). Additionally, the information is protected under FOIA Exemption 3. *See* Fixing America's Surface Transportation Act, Pub. L. No. 114-94, § 61003 (2015) (specifically exempting the disclosure of CEII and establishing applicability of FOIA Exemption 3, 5 U.S.C. § 552(b)(3)). Accordingly, the names of the UREs associated with the foregoing dockets will not be disclosed.

On November 18, 2019, you filed suit in the U.S. District Court for the District of Columbia asserting claims in connection with this FOIA request. *See Mabee v. Fed. Energy Reg. Comm'n.*, Civil Action No. 19-3448 (KBJ) (D.D.C.). Because this FOIA request is currently in litigation, this letter does not contain information regarding administrative appeal of the response to the FOIA request.

For any further assistance or to discuss any aspect of your request, you may contact Assistant United States Attorney April D. Seabrook by email at april.seabrook@usdoj.gov, by phone at (202) 252-2525, or by mail at United States Attorney's Office – Civil Division, U.S. Department of Justice, 555 Fourth Street, N.W., Washington, D.C. 20530.

Sincerely,

LINDSEE Digitally signed by
LINDSEE GENTRY
GENTRY Date: 2021.01.29
16:19:47 -05'00'

Lindsee Gentry
Director
Office of External Affairs

FOIA FY19-30

- 3 -

Cc Mr. Peter Sorenson, Esq.
Counsel for Mr. Mabee
petesorenson@gmail.com

James M. McGrane
Senior Counsel
North American Electric Reliability Corporation
1325 G Street N.W. Suite 600
Washington, D.C. 20005
James.McGrane@nerc.net

Exhibit 115

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

Excerpts from NP18-7-000 NOP, FERC No Further Review Letter & FOIA denial letter.

Mitigation dates are highlighted in the NOP.

Note: For brevity, Exhibits 113-116 contain excerpts of the public Notices of Penalty. However, the expert witnesses reviewed the full and complete version of the Notices of Penalty represented by these exhibits. The full public Notice of Penalties for these four dockets are available on FERC's website

(<https://elibrary.ferc.gov/eLibrary/search>) by searching for either the docket numbers or for the Accession Numbers: NP10-160-000: Accession Number 20100913-5034; NP10-135-000: Accession Number 20100706-5172; NP18-7-000: Accession Number 20180228-5108; and NP18-14-000: Accession Number 20180531-5251.



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

NON-PUBLIC AND CONFIDENTIAL INFORMATION
HAS BEEN REMOVED FROM THIS PUBLIC VERSION

February 28, 2018

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

**Re: NERC Full Notice of Penalty regarding Unidentified Registered Entity,
FERC Docket No. NP18-_-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Notice of Penalty¹ regarding noncompliance by an Unidentified Registered Entity (URE) in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations, and orders, as well as NERC's Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).²

NERC is filing this Notice of Penalty, with information and details regarding the nature and resolution of the violations,³ with the Commission because Western Electricity Coordinating Council (WECC) and URE have entered into a Settlement Agreement to resolve all outstanding issues arising from WECC's determination and findings of two violations of the Critical Infrastructure Protection (CIP) NERC Reliability Standards.

¹ *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards* (Order No. 672), III FERC Stats. & Regs. ¶ 31,204 (2006); *Notice of New Docket Prefix "NP" for Notices of Penalty Filed by the North American Electric Reliability Corporation*, Docket No. RM05-30-000 (February 7, 2008). See also 18 C.F.R. Part 39 (2017). *Mandatory Reliability Standards for the Bulk-Power System*, FERC Stats. & Regs. ¶ 31,242 (2007) (Order No. 693), *reh'g denied*, 120 FERC ¶ 61,053 (2007) (Order No. 693-A). See 18 C.F.R. § 39.7(c)(2).

² See 18 C.F.R. § 39.7(c)(2) and 18 C.F.R. § 39.7(d).

³ For purposes of this document, each violation at issue is described as a "violation," regardless of its procedural posture and whether it was a possible, alleged, or confirmed violation.

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NERC Notice of Penalty
Unidentified Registered Entity
February 28, 2018
Page 2

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According to the Settlement Agreement, URE neither admits nor denies the violations, but has agreed to the assessed penalty of two million seven hundred thousand dollars (\$2,700,000), in addition to other remedies and actions to mitigate the instant violations and facilitate future compliance under the terms and conditions of the Settlement Agreement.

Statement of Findings Underlying the Violations

This Notice of Penalty incorporates the findings and justifications set forth in the Settlement Agreement, by and between WECC and URE. The details of the findings and basis for the penalty are set forth in the Settlement Agreement and herein. This Notice of Penalty filing contains the basis for approval of the Settlement Agreement by the NERC Board of Trustees Compliance Committee (NERC BOTCC).

In accordance with Section 39.7 of the Commission's regulations, 18 C.F.R. § 39.7 (2017), NERC provides the following summary table identifying each violation of a Reliability Standard resolved by the Settlement Agreement.

| Violation(s) Determined and Discovery Method | | | | | | |
|--|-----------|------|-------------------|-------------------|---------|----------------|
| *SR = Self-Report / SC = Self-Certification / CA = Compliance Audit / SPC = Spot Check / CI = Compliance Investigation | | | | | | |
| NERC Violation ID | Standard | Req. | VRF/VSL | Discovery Method* | Risk | Penalty Amount |
| WECC2016016233 | CIP-003-3 | R4 | Medium/ Severe | SR | Serious | \$2.7M |
| WECC2016016234 | CIP-003-3 | R5 | Lower/ Severe | | | |

Background to the Violations

URE received a report of an online data exposure with data possibly associated with URE. The report came from a white hat security researcher not associated with URE. A third-party URE contractor exceeded its authorized access by improperly copying certain URE data from URE's network environment to the contractor's network environment, where it was no longer subject to URE's visibility or controls. The contractor failed to comply with URE's information protection program on which it was trained. While the data was on the contractor's network, a subset of live URE data was accessible online without the need to enter a user ID or password. This subset of data included over

NERC Notice of Penalty
Unidentified Registered Entity
February 28, 2018
Page 5

NON-PUBLIC AND CONFIDENTIAL INFORMATION
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completion, the vendor would then securely transfer the new version of code to an authorized URE employee who would load it back onto the asset management database;

5. Changed access controls to the database. URE also deployed a suite program to provide policies and controls to prevent confidential-Bulk Electric System (BES) Cyber System Information or restricted-BES Cyber System Information classified emails and attachments from being sent to outside email addresses;
6. Improved security controls for vendor management by requiring vendors to take information security and privacy awareness training annually, implementing a new vendor remote access platform, and enhancing policies, background checks, and contract language for vendor employees; and
7. Classified all BES Cyber System Information for both production and non-production assets.

URE certified that it had completed its Mitigation Plan, and WECC verified that URE had completed all mitigation activities.

VIOLATION DESCRIPTIONS

CIP-003-3 R4 - OVERVIEW

WECC determined that URE did not adequately implement its program to identify, classify, and protect information associated with CCAs, as required by CIP-003-3 R4. Specifically, in the above described incident, WECC found that URE failed to adequately implement the following areas of its program to identify, classify, and protect information associated with CCAs:

1. URE failed to identify and classify the information used in the system in accordance with its information protection policy. URE stated it did not classify in accordance with its policy because the information was part of a pre-production asset management system. Even though the data was in a pre-production system, it is live CCA Information, and URE was required to implement a program to identify, classify, and protect this information.
2. Due to URE's failure to classify the information, URE also failed to provide the proper protections during storage and transmission, distribution, and duplication, in accordance with its policy.
3. URE failed to designate the system and the contractor's network IP as a CCA Information approved storage location and store CCA Information in an approved location.
4. URE failed to ensure that personnel handling CCA Information adhered to URE's protection measures.

NERC Notice of Penalty
Unidentified Registered Entity
February 28, 2018
Page 6

NON-PUBLIC AND CONFIDENTIAL INFORMATION
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5. URE failed to activate its existing policies or procedures for sharing protected information with third parties before information was disseminated, either electronically or physically, in accordance with its policy.

The cause of this violation was URE's failure to apply its information protection program to the CCA Information in its pre-production environment.

WECC determined that this violation posed a serious and substantial risk to the reliability of the BPS.

WECC determined the duration of the violation to be approximately 590 days, from the date the third-party contractor exposed the information on the Internet, through when URE completed classifying all CCA Information for production and non-production assets. WECC cannot confirm that another third party did not capture and retain possession of the exposed data.

CIP-003-3 R5 - OVERVIEW

WECC determined that URE did not implement a program for managing access to protected CCA Information, as required by CIP-003-3 R5. Specifically, in the above described incident, WECC found that URE failed to ensure that the contractor protected the CCA Information when it improperly copied the data from URE's network environment to the contractor's network environment, where it was no longer subject to URE's visibility or controls. In response to a data request, due to the fact that the contractor copied the data to an unapproved location, URE stated that the security controls for the contractor's storage location were not understood or documented. WECC found that URE did not understand or document the security controls at the contractor's location before it released information to the contractor, and afterward, when the data was exposed to the Internet, it failed to adequately implement its program for managing access.

The cause of this violation was URE's failure to ensure its contractor followed its information protection program and procedures on which the contractor was trained.

WECC determined that this violation posed a serious and substantial risk to the reliability of the BPS.

WECC determined the duration of the violation to be approximately 80 days, from the date the third-party contractor exposed the information on the Internet, through when the white hat security researcher deleted all remaining electronic copies of data and screen shots from his hard drive and sanitized his device to prevent future access. WECC cannot confirm that another third party did not capture and retain possession of the exposed data.

NERC Notice of Penalty
Unidentified Registered Entity
February 28, 2018
Page 7

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Regional Entity's Basis for Penalty

According to the Settlement Agreement, WECC has assessed a penalty of two million seven hundred thousand dollars (\$2,700,000) for the referenced violations as well as a non-monetary sanction. As an additional sanction designed to reduce the opportunities for a malicious actor to use the exposed data, WECC required URE to set its relevant CIP passwords-remembered to "all" or the maximum the system will remember to prevent passwords from being used more than once, or to maximize the frequency for which a password may be used.

In reaching this determination, WECC considered the following factors:

1. the instant violations constitute URE's first occurrence of violations of the subject NERC Reliability Standards;
2. URE had an internal compliance program at the time of the violation;
3. URE self-reported the violations;
4. URE was not fully transparent and forthcoming with all pertinent information detailing the data exposed in the incident. Specifically, URE did not provide WECC initially with all the data fields exposed in the incident;
5. the violations posed a serious and substantial risk to the reliability of the BPS; and
6. there were no other mitigating or aggravating factors or extenuating circumstances that would affect the assessed penalty.

After consideration of the above factors, WECC determined that, in this instance, the penalty amount of two million seven hundred thousand dollars (\$2,700,000) is appropriate and bears a reasonable relation to the seriousness and duration of the violations.

NERC Notice of Penalty
Unidentified Registered Entity
February 28, 2018
Page 8

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Statement Describing the Assessed Penalty, Sanction or Enforcement Action Imposed⁴

Basis for Determination

Taking into consideration the Commission's direction in Order No. 693, the NERC Sanction Guidelines and the Commission's July 3, 2008, October 26, 2009 and August 27, 2010 Guidance Orders,⁵ the NERC BOTCC reviewed the Settlement Agreement and supporting documentation on February 6, 2018, and approved the Settlement Agreement. In approving the Settlement Agreement, the NERC BOTCC reviewed the applicable requirements of the Commission-approved Reliability Standards and the underlying facts and circumstances of the violations at issue.

For the foregoing reasons, the NERC BOTCC approved the Settlement Agreement and believes that the assessed penalty of two million seven hundred thousand dollars (\$2,700,000) is appropriate for the violations and circumstances at issue, and is consistent with NERC's goal to promote and ensure reliability of the BPS.

Pursuant to 18 C.F.R. § 39.7(e), the penalty will be effective upon expiration of the 30-day period following the filing of this Notice of Penalty with FERC, or, if FERC decides to review the penalty, upon final determination by FERC.

⁴ See 18 C.F.R. § 39.7(d)(4).

⁵ *North American Electric Reliability Corporation*, "Guidance Order on Reliability Notices of Penalty," 124 FERC ¶ 61,015 (2008); *North American Electric Reliability Corporation*, "Further Guidance Order on Reliability Notices of Penalty," 129 FERC ¶ 61,069 (2009); *North American Electric Reliability Corporation*, "Notice of No Further Review and Guidance Order," 132 FERC ¶ 61,182 (2010).

NERC Notice of Penalty
Unidentified Registered Entity
February 28, 2018
Page 9

NON-PUBLIC AND CONFIDENTIAL INFORMATION
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Notices and Communications: Notices and communications with respect to this filing may be addressed to the following:

| | |
|---|---|
| <p>Jim Robb* Chief Executive Officer Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6853 (801) 883-6894 – facsimile jrobb@wecc.biz</p> <p>Steve Goodwill* Vice President and General Counsel Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6857 (801) 883-6894 – facsimile sgoodwill@wecc.biz</p> <p>Ruben Arredondo* Senior Legal Counsel Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 819-7674 (801) 883-6894 – facsimile rarredondo@wecc.biz</p> <p>Heather Laws* Director of Enforcement Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 819-7642 (801) 883-6894 – facsimile hlaws@wecc.biz</p> | <p>.. na C. Mendonça Vice President, Acting General Counsel and Corporate Secretary, and Director of Enforcement North American Electric Reliability Corporation 1325 G Street N.W. Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile sonia.mendonca@nerc.net</p> <p>Edwin G. Kichline* Senior Counsel and Director of Enforcement Oversight North American Electric Reliability Corporation 1325 G Street N.W. Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile edwin.kichline@nerc.net</p> <p>Leigh Anne Faugust* Counsel North American Electric Reliability Corporation 1325 G Street N.W. Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile leigh.faugust@nerc.net</p> |
|---|---|

NERC Notice of Penalty
Unidentified Registered Entity
February 28, 2018
Page 10

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*Persons to be included on the Commission's service list are indicated with an asterisk. NERC requests waiver of the Commission's rules and regulations to permit the inclusion of more than two people on the service list.

NERC Notice of Penalty
Unidentified Registered Entity
February 28, 2018
Page 11

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Conclusion

NERC respectfully requests that the Commission accept this Notice of Penalty as compliant with its rules, regulations, and orders.

Respectfully submitted,

/s/ Leigh Anne Faugust

Sonia C. Mendonça
Vice President, Acting General Counsel and
Corporate Secretary, and Director of
Enforcement
Edwin G. Kichline
Senior Counsel and Director of
Enforcement Oversight
Leigh Anne Faugust
Counsel
North American Electric Reliability
Corporation
1325 G Street N.W.
Suite 600
Washington, DC 20005
(202) 400-3000
(202) 644-8099 - facsimile
sonia.mendonca@nerc.net
edwin.kichline@nerc.net
leigh.faugust@nerc.net

cc: Unidentified Registered Entity
Western Electricity Coordinating Council

163 FERC ¶ 61,153
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation

Docket Nos. NP18-10-000

→ NP18-7-000

NOTICE

(Issued May 30, 2018)

Take notice that the Commission will not further review, on its own motion, the following Notices of Penalty:

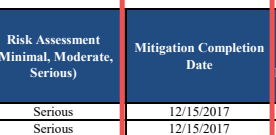
| <u>Docket No.</u> | <u>Filing Date</u> | <u>Registered Entity</u> |
|-------------------|--------------------|--------------------------|
| NP18-10-000 | April 30, 2018 | Spreadsheet NOP |

In addition, pursuant to 18 C.F.R. §39.7(e)(1) (2012), the Commission extended until May 29, 2018, the time period for consideration whether to review on its own motion the penalty contained in the Notice of Penalty in Docket No. NP18-7-000.

→ If no further action is taken by the Commission in this matter by that date, the penalties will be deemed affirmed by operation of law.

By direction of the Commission.

Nathaniel J. Davis, Sr.,
Deputy Secretary.



| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|-----|---|--|----------------------------|------------------------------------|
| 2/28/2018 | NP18-7-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$2,700,000 | WECC2016016233 | CIP-003-3 | R4 | Medium | Serious | 12/15/2017 | X |
| 2/28/2018 | NP18-7-000 | WECC | Unidentified Registered Entity | NCRXXXXX | \$2,700,000 | WECC2016016234 | CIP-003-3 | R5 | Medium | Serious | 12/15/2017 | X |

Federal Energy Regulatory Commission
Washington, D.C. 20426
February 26, 2021

Re: FOIA FY19-30 and FOIA
FY19-19 (Rolling)
Response Letter – Denial

VIA ELECTRONIC MAIL ONLY

Michael Mabee
6937 Nine Mile Bridge Road
Fort Worth, TX 76135
CivilDefenseBook@gmail.com

Dear Mr. Mabee:

This is a rolling response to your correspondence received in January 2019, in which you requested information pursuant to the Freedom of Information Act (FOIA), and the Federal Energy Regulatory Commission's (Commission) FOIA regulations. *See* 5 U.S.C. § 552; 18 C.F.R. § 388.108 (2020). Your request is for the names of the Unidentified Registered Entities (UREs) associated with various public dockets, including: NP11-247; NP11-262; NP11-263; NP11-264; NP17-21; NP17-25; NP18-2; NP18-7; NP18-14; and NP18-15. Based on staff's internal assessment, disclosure of the UREs associated with these dockets is not appropriate. Accordingly, as discussed further below, the identities will be withheld pursuant to Exemption 3 and Exemption 7(F).

Identities of UREs

Before making a determination as to whether this information is appropriate for release under FOIA, a case-by-case assessment of the requested information must consider the following: the nature of the Critical Infrastructure Protection (CIP) violation, including whether there is a Technical Feasibility Exception involved that does not allow the Unidentified Registered Entity to fully meet the CIP requirements; whether vendor-related information is contained in the Notices of Penalty (NOP); whether mitigation is complete; the content of the public and non-public versions of the NOP; the extent to which the disclosure of the identity of the URE and other information would be useful to someone seeking to cause harm; whether a successful audit has occurred since the violation(s); whether the violation(s) was administrative or technical in nature; and the length of time that has elapsed since the filing of the public NOP. An application of these factors will dictate whether a particular FOIA exemption, including 7(F) and/or Exemption 3, is appropriate. *See Garcia v. U.S. DOJ*, 181 F. Supp. 2d 356, 378 (S.D.N.Y. 2002) (“In evaluating the validity of an agency's invocation of Exemption

FOIA FY19-30 and FOIAFY19-19 - 2 -

7(F), the court should within limits, defer to the agency's assessment of danger.”) (citation and internal quotations omitted).

Based on the application of the various factors discussed above, I conclude that disclosing the identities of the UREs associated with these dockets, would create a risk of harm or detriment to life, physical safety, or security because the specified UREs could become the target of a potentially bad actor. Therefore, the information is protected from disclosure under FOIA Exemption 7(F). *See* 5 U.S.C. § 552(b)(7)(F) (protecting law enforcement information where release “could reasonably be expected to endanger the life or physical safety of any individual.”). Additionally, the information is protected under FOIA Exemption 3. *See* Fixing America's Surface Transportation Act, Pub. L. No. 114-94, § 61003 (2015) (specifically exempting the disclosure of CEII and establishing applicability of FOIA Exemption 3, 5 U.S.C. § 552(b)(3)). Accordingly, the names of the UREs associated with the foregoing dockets will not be disclosed.

On November 18, 2019, you filed suit in the U.S. District Court for the District of Columbia asserting claims in connection with this FOIA request. *See Mabee v. Fed. Energy Reg. Comm’n.*, Civil Action No. 19-3448 (KBJ) (D.D.C.). Because this FOIA request is currently in litigation, this letter does not contain information regarding administrative appeal of the response to the FOIA request.

For any further assistance or to discuss any aspect of your request, you may contact Assistant United States Attorney April D. Seabrook by email at april.seabrook@usdoj.gov, by phone at (202) 252-2525, or by mail at United States Attorney’s Office – Civil Division, U.S. Department of Justice, 555 Fourth Street, N.W., Washington, D.C. 20530.

Sincerely,

MARY O'DRISCOLL

Digitally signed by MARY
O'DRISCOLL
Date: 2021.02.26 14:16:17 -05'00'

Mary O'Driscoll
Acting Director
Office of External Affairs

FOIA FY19-30 and FOIAFY19-19

- 3 -

Cc Mr. Peter Sorenson, Esq.
Counsel for Mr. Mabee
petesorenson@gmail.com

James M. McGrane
Senior Counsel
North American Electric Reliability Corporation
1325 G Street N.W. Suite 600
Washington, D.C. 20005
James.McGrane@nerc.net

Exhibit 116

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

Excerpts from NP18-14-000 NOP, FERC No Further Review Letter & FOIA denial letter.

Mitigation dates are highlighted in the NOP.

Note: For brevity, Exhibits 113-116 contain excerpts of the public Notices of Penalty. However, the expert witnesses reviewed the full and complete version of the Notices of Penalty represented by these exhibits. The full public Notice of Penalties for these four dockets are available on FERC's website

(<https://elibrary.ferc.gov/eLibrary/search>) by searching for either the docket numbers or for the Accession Numbers: NP10-160-000: Accession Number 20100913-5034; NP10-135-000: Accession Number 20100706-5172; NP18-7-000: Accession Number 20180228-5108; and NP18-14-000: Accession Number 20180531-5251.



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

NON-PUBLIC AND CONFIDENTIAL INFORMATION
HAS BEEN REMOVED FROM THIS PUBLIC VERSION

May 31, 2018

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

**Re: NERC Full Notice of Penalty regarding Unidentified Registered Entity
FERC Docket No. NP18-_-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Notice of Penalty¹ regarding noncompliance by an Unidentified Registered Entity (URE) in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations, and orders, as well as NERC's Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).²

NERC is filing this Notice of Penalty, with information and details regarding the nature and resolution of the violations,³ with the Commission because ReliabilityFirst Corporation (ReliabilityFirst) and URE have entered into a Settlement Agreement to resolve all outstanding issues arising from ReliabilityFirst's determination and findings of 22 violations of the Critical Infrastructure Protection (CIP) NERC Reliability Standards.

¹ *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards* (Order No. 672), III FERC Stats. & Regs. ¶ 31,204 (2006); *Notice of New Docket Prefix "NP" for Notices of Penalty Filed by the North American Electric Reliability Corporation*, Docket No. RM05-30-000 (February 7, 2008). See also 18 C.F.R. Part 39 (2018). *Mandatory Reliability Standards for the Bulk-Power System*, FERC Stats. & Regs. ¶ 31,242 (2007) (Order No. 693), *reh'g denied*, 120 FERC ¶ 61,053 (2007) (Order No. 693-A). See 18 C.F.R. § 39.7(c)(2).

² See 18 C.F.R. § 39.7(c)(2) and 18 C.F.R. § 39.7(d).

³ For purposes of this document, each violation at issue is described as a "violation," regardless of its procedural posture and whether it was a possible, alleged, or confirmed violation.

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NERC Notice of Penalty
Unidentified Registered Entity
May 31, 2018
Page 2

NON-PUBLIC AND CONFIDENTIAL INFORMATION
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According to the Settlement Agreement, URE admits to the violations and has agreed to the assessed penalty of one hundred eighty thousand dollars (\$180,000), in addition to other remedies and actions to mitigate the instant violations and facilitate future compliance under the terms and conditions of the Settlement Agreement.

Statement of Findings Underlying the Violations

This Notice of Penalty incorporates the findings and justifications set forth in the Settlement Agreement, by and between ReliabilityFirst and URE. The details of the findings and basis for the penalty are set forth herein. This Notice of Penalty filing contains the basis for approval of the Settlement Agreement by the NERC Board of Trustees Compliance Committee (NERC BOTCC).

In accordance with Section 39.7 of the Commission's regulations, 18 C.F.R. § 39.7 (2018), NERC provides the following summary table identifying each violation of a Reliability Standard resolved by the Settlement Agreement. Further information on the subject violations is set forth herein.

NERC Notice of Penalty
Unidentified Registered Entity
May 31, 2018
Page 3

NON-PUBLIC AND CONFIDENTIAL INFORMATION
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| Violation(s) Determined and Discovery Method | | | | | | |
|--|------------|------|---------------------|---------------------------|----------|----------------|
| *SR = Self-Report / SC = Self-Certification / CA = Compliance Audit / SPC = Spot Check / CI = Compliance Investigation | | | | | | |
| NERC Violation ID | Standard | Req. | VRF/ VSL | Discovery Method* Date | Risk | Penalty Amount |
| RFC2015014936 | CIP-003-3 | R5 | Lower/ Severe | SR | Minimal | \$180K |
| RFC2016015692 | CIP-003-3 | R5 | Lower/ Severe | SR | Moderate | |
| RFC2015015313 | CIP-003-3 | R6 | Medium/ Severe | SR | Minimal | |
| RFC2016015717 | CIP-003-3 | R6 | Lower/ Severe | SR | Minimal | |
| RFC2015015008 | CIP-004-3a | R3 | Medium/ Moderate | SR | Minimal | |
| RFC2015015009 | CIP-004-3a | R4 | Lower/ High | SR | Minimal | |
| RFC2015015402 | CIP-004-3a | R4 | Lower/ Severe | SR | Minimal | |
| RFC2016015716 | CIP-004-3a | R4 | Lower/ Severe | SR | Minimal | |
| RFC2016016474 | CIP-005-3a | R1 | Medium/ Severe | SR | Moderate | |
| RFC2015015314 | CIP-006-3c | R1 | Medium/ Severe | SR | Minimal | |
| RFC2016015844 | CIP-006-3c | R5 | Medium/ Severe | SR | Serious | |
| RFC2016015715 | CIP-007-3a | R1 | Medium/ Severe | SR | Minimal | |
| RFC2016015714 | CIP-007-3a | R2 | Medium/ Severe | SR | Moderate | |

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|---------------|------------|----|-------------------|----|----------|--------|
| RFC2015015241 | CIP-007-3a | R3 | Lower/ Severe | SR | Minimal | \$180K |
| RFC2016015843 | CIP-007-3a | R3 | Lower/ Severe | SR | Minimal | |
| RFC2016015538 | CIP-007-3a | R5 | Lower/ Severe | SR | Minimal | |
| RFC2016015713 | CIP-007-3a | R5 | Medium/ Severe | SR | Moderate | |
| RFC2016015752 | CIP-007-3a | R6 | Medium/ Severe | SR | Moderate | |
| RFC2015015107 | CIP-007-3a | R6 | Lower/ Severe | SR | Minimal | |
| RFC2017017565 | CIP-007-6 | R2 | High/ Severe | CA | Minimal | |
| RFC2017017566 | CIP-007-6 | R5 | Medium/ High | CA | Minimal | |
| RFC2015015312 | CIP-014-2 | R1 | High/ Lower | SR | Moderate | |

RISK COMMON TO THE VIOLATIONS

ReliabilityFirst determined the penalty in this case based on the six moderate risk violations and the one serious risk violation.

Fifteen of the violations posed a minimal risk, six posed a moderate risk, and one posed a serious and substantial risk to the reliability of the bulk power system (BPS). ReliabilityFirst determined the violations do not involve and are not indicative of programmatic issues across URE's CIP compliance program. URE implemented internal controls that identified many of the instant violations. While most of the violations were short in duration, or relatively short, several of the moderate risk violations had longer durations (up to two years), indicating a potential weakness in detective controls in these areas.

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Nevertheless, these moderate risk violations generally involved isolated systems or assets, and thus, did not involve programmatic or systemic issues.

URE had some internal controls in place that mitigated the risk to the BPS. For example, URE's buildings and Physical Security Perimeters (PSPs) were under surveillance 24 hours a day, seven days a week; Physical Access Control Systems (PACSS) were isolated, requiring authorized physical and electronic access; Bulk Electric System (BES) Cyber Assets had both logical and physical protection; and URE used detective logging and alarming tools.

The serious risk violation provided the opportunity for undetected compromise of an unmanned, critical substation and showed URE's inability to respond due to lack of situational awareness. While the risk was somewhat mitigated because certain assets were being monitored via an alert and monitoring program, which would have detected unauthorized changes, and local physical access controls were working, URE's headquarters could not monitor or communicate with the site and thus would have been unaware of and unable to respond to an intrusion.

CIP-003-3 R5 (RFC2015014936) - OVERVIEW

ReliabilityFirst determined that URE failed to document and implement a program for managing access to protected Critical Cyber Assets (CCAs) as required by CIP-003-3 R5, in three separate instances. In two instances, employees did not immediately pick up printed versions of CIP documents from printers. In the third instance, URE inadvertently set the confidentiality classification level for a CIP process document to "public" view on its internal site.

ReliabilityFirst determined the duration of the violation to be approximately one year and nine months, from when the confidential document was inadvertently set to "public" view, to the date by which all three instances were mitigated by protecting or destroying the confidential information.

The violation involved the management practices of external interdependencies and workforce management. External interdependencies management was involved because URE's contractor failed to protect CIP information as required. Workforce management was involved because, in all three instances, additional training and awareness could have helped to prevent these errors.

ReliabilityFirst determined that this violation posed a minimal risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

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1. Identify and implement a technological solution to control and monitor end-point printing;
2. Train on and validate the solution's effectiveness;
3. Identify changes required to maintain integrity of documents within the document repository when updating, changing, or moving documents;
4. Prevent URE resources from uploading documentation directly to internal site through a certain mode, therefore forcing documentation to be added in an approved and documented method; and
5. Validate the metadata prior to document publication.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.



CIP-003-3 R5 (RFC2016015692) – OVERVIEW

ReliabilityFirst determined that URE failed to document and implement a program for managing access to protected CCAs as required by CIP-003-3 R5. Specifically, a URE reliability assurance team member was able to access a file in a URE NERC compliance information folder, which contained CIP protected information.

ReliabilityFirst determined the duration of the violation to be approximately two years and one month, from the date URE permitted unauthorized individuals access to CIP information, to the date URE completed its Mitigation Plan.

The violation involved the management practice of asset and configuration management because URE did not have an accurate understanding of the effects of the configurations of folders within its access system.

ReliabilityFirst determined that this violation posed a moderate risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Investigate and resolve issues with folder permissions on the relevant folder;
2. Identify folders that contain information utilizing a certain document (URE's list of approved BES Cyber System information repositories) as well as existing enterprise job roles;
3. Contact CIP data owners to confirm that all of their repositories are listed on the relevant repository list document;
4. Create a procedure for how new file share repositories will be created on servers;
5. Create a procedure to migrate the folders identified in milestone two;

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6. Migrate the relevant folders; and
7. Remove creator owner permissions from all shared folders identified in milestone two.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

CIP-003-3 R6 (RFC2015015313) – OVERVIEW

ReliabilityFirst determined that URE failed to have minimum security management controls in place to protect CCAs. Specifically, an analyst added a device to URE's logging tool, and added the correct group to receive the alerting for the device. The next day, another analyst deleted the device from the logging tool. Thereafter, the logging tool was retaining logs for a certain device, but the device was not in the correct group to alert on the required conditions.

ReliabilityFirst determined the duration of the violation to be approximately four-and-a-half months, from the date the device was deleted and thus not alerting, to the date URE added the device to the correct alerting group.

The root cause of this violation was that an analyst did not follow the proper change management process despite being trained on the proper procedure for change management. This violation involved the management practices of asset and configuration management and workforce management. Asset and configuration management was involved because URE did not adhere to its configuration management process. Workforce management was involved because URE staff did not adhere to their internal procedures and controls in configuring a Cyber Asset.

ReliabilityFirst determined that this violation posed a minimal risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Terminate the analyst as a result of not satisfactorily performing his job responsibilities relating to this incident and other actions;
2. Determine the extent of condition by verifying that all assets which are defined in URE's CCA lists are sending logs to the logging tool and are associated with the correct groups to generate alerts defined in a relevant security status monitoring process;
3. Evaluate the solution to monitor the configuration of the logging tool's log sources that controls CIP alerting and test email alerting;

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4. Build a new rule in the logging tool to alert the manager of the cyber security department and the director of networks and information security department after the logging tool has not received logs from a certain period of time;
5. Implement a solution to monitor the logging tool's log source group defined that controls CIP alerting and configured email alerts to the cyber security team when there are changes to that group;
6. Update the processes and work forms associated with change management and commissioning to include specific controls an asset administrator must act upon to ensure CIP-005 and CIP-007 controls are addressed in alignment with the current CIP version; and
7. Conduct a page-turn training session of newly proposed processes and work forms, and address all applicable questions and concerns during the page-turn exercise.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

CIP-003-3 R6 (RFC2016015717) – OVERVIEW

ReliabilityFirst determined that URE failed to have minimum security management controls in place to protect CCAs. Specifically, in two instances URE did not follow the established change management process: first, when URE deployed a PACS intelligent controller into production, and second, when URE made changes to several assets.

ReliabilityFirst determined the duration of the violation to be approximately 10 months, from the date URE was required to comply with CIP-003-3 R6, to the date URE completed its Mitigation Plan.

Regarding the first instance, the root cause was lack of managerial oversight during a transition process where URE was transitioning the responsibility of the PACS devices from its security department, which did not have the appropriate technical expertise, to its engineering group. This violation occurred during the transition time when these Cyber Assets were being incorporated into the engineering group's change control process. Regarding the second instance, the violation involved the management practices of asset and configuration management and workforce management. Asset and configuration management was involved because URE did not adhere to its configuration management process. Workforce management was involved because URE staff did not adhere to their internal procedures and controls in configuring a Cyber Asset.

ReliabilityFirst determined that this violation posed a minimal risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

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1. Complete changes to the engineering change control process to align with CIP Version 5;
2. Update engineering CIP Cyber Asset management system (CAMS) to align with the new change control process;
3. Develop CIP Version 5 capable baseline configuration in CAMS;
4. File and obtain approval of Technical Feasibility Exceptions (TFEs) for the PACS to complete CIP Version 5 commissioning tasks in CAMS;
5. Develop a separate security configuration procedure for the relevant controller;
6. Complete commissioning and change control tasks for assets installed at the relevant locations;
7. Establish a change review board;
8. Train all engineering personnel responsible for the use of CAMS for all CIP changes on related systems;
9. Implement a new change management tool; and
10. Train relevant teams on the use of the new change management tool.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

CIP-004-3a R3 (RFC2015015008) – OVERVIEW

ReliabilityFirst determined that URE failed to have a documented Personnel Risk Assessment (PRA) program for personnel having authorized cyber or authorized unescorted physical access to CCAs. Specifically, URE granted four employees unescorted physical access without appropriately documented PRAs.

ReliabilityFirst determined the duration of the violation to be approximately one month, from the date URE granted unescorted physical access without the requisite PRAs, to the date URE revoked the access.

Regarding the root cause, a specialist reviewed a large number of identities over a three-day period during the rollout of URE's new role-based access process, which led to these four errors in the process. This violation involved the management practice of work management and verification as the errors were caused because of having to review many PRAs in a short period, and not conducting a review to verify that there were no errors in that review process.

ReliabilityFirst determined that this violation posed a minimal risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

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1. Conduct individual counseling with the security specialist;
2. Conduct a meeting with the impacted groups to discuss the incident;
3. Conduct reinforcement training of all corporate security personnel involved with CIP-004-3 R3 compliance;
4. Formulate a likelihood risk-based PRA review methodology;
5. Conduct a review of PRA documentation for those identified individuals and took immediate action on any issues identified therein; and
6. Revise URE policy requiring URE corporate security to perform PRAs on all individuals requiring any level of unescorted access, whether CIP or non-CIP in nature, thus eliminating the reliance on another entity to perform the PRA.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

CIP-004-3a R4 (RFC2015015009) – OVERVIEW

ReliabilityFirst determined that URE failed to maintain lists of personnel with authorized cyber or authorized unescorted physical access to CCAs. Specifically, this violation involves three instances of URE not properly revoking access within the seven-day period.

ReliabilityFirst determined the duration of the violation to be approximately one year, from the date URE was required to comply with CIP-004-3a R4, to the date URE completed its Mitigation Plan.

The violation involved the management practice of workforce management because they involve employees taking some, but not all steps necessary to complete revocation in a timely manner as a result of rushing through the tasks. Additionally, URE could have had additional controls in place to ensure the employees completed all necessary steps to revoke access in a timely manner.

ReliabilityFirst determined that this violation posed a minimal risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Modify the workflows for all access revocation-related requests to include a reviewer step;
2. Identify any additional identities with “invalid” termination dates;
3. Disable future termination capability;
4. Train system administrators of the identity access system regarding the capability changes and process handling;

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5. Modify workflows to accommodate an escalation process for all individual access revocations; and
6. Review and revise the process and requirements for revocation of access when a temporary leave of absence occurs.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

CIP-004-3a R4 (RFC2015015402) – OVERVIEW

ReliabilityFirst determined that URE failed to maintain lists of personnel with authorized cyber or authorized unescorted physical access to CCAs. Specifically, access for one URE employee located at another registered entity's facility was not properly revoked within the seven-day period.

ReliabilityFirst determined the duration of the violation to be approximately four-and-a-half months, from the date URE was required to remove the employee's access to the date URE removed the access.

The root cause was that the registered entity that owned the facility the employee was located failed to follow the procedure for notifying URE when an employee no longer needs access. Additionally, URE's additional proactive measure, where URE sent weekly emails to the registered entity identifying the individuals who currently had access, failed because the registered entity did not properly review the weekly email. URE had been sending the registered entity the weekly emails since before the violation began. The email should have prompted the registered entity to inform URE of the individual's departure from the company within the required timeframe. The violation also involved the management practice of external interdependencies because URE failed to mitigate risks relating to third parties

ReliabilityFirst determined that this violation posed a minimal risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Request access removal form from the registered entity;
2. Receive access removal form;
3. Request follow-up resignation data regarding the employee in question;
4. Receive resignation data from the registered entity;
5. Receive results of the registered entity's internal investigation;
6. Set up a meeting with the registered entity to identify corrective or preventive actions;

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7. Reinforce with the registered entity the CIP-004-3 and future CIP-004-5 access removal requirements;
8. Receive evidence of the registered entity's internal training regarding CIP-004 access removal requirements; and
9. Revise the unescorted physical access agreement between URE and the registered entity.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

CIP-004-3a R4 (RFC2016015716) – OVERVIEW

ReliabilityFirst determined that URE failed to maintain lists of personnel with authorized cyber or authorized unescorted physical access to CCAs. Specifically, access for one URE employee was not properly revoked within the seven-day period after changing job duties within URE.

ReliabilityFirst determined the duration of the violation to be approximately two weeks, from the date URE should have removed access, to the date URE removed access.

The root cause was an unclear designation of CIP versus non-CIP access within URE's alert tool, which contributed to human performance issues in completing the access removal tasks. This violation involved the management practice of workforce management because additional training, along with clearer designations in the system, could have helped prevent this violation.

ReliabilityFirst determined that this violation posed a minimal risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Introduce and train affected personnel on the new CIP Standards;
2. Launch a new CIP access revocation process; and
3. Email notifications from the alert tool with priority status to revoke CIP access initiated.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

CIP-005-3a R1 (RFC2016016474) – OVERVIEW

ReliabilityFirst determined that URE failed to ensure that every CCA resided within an Electronic Security Perimeter (ESP). Specifically, URE did not identify and document an access point to the ESP.

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ReliabilityFirst determined the duration of the violation to be approximately one year and seven months, from the first date that a substation technician was dispatched to perform maintenance that required connection to both CAMs and a BES Cyber Asset, to the date URE completed its Mitigation Plan.

The violation involved the management practice of verification because URE failed to verify that it properly identified and understood all external routable connections and access points.

ReliabilityFirst determined that this violation posed a moderate risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Update URE's cyber security policy to address that URE resources shall only utilize URE authorized Transient Cyber Assets (TCAs) when connecting to a High or Medium impact BES Cyber System(s), Protected Cyber Asset(s), and/or ESP(s);
2. Implement a project plan for TCAs that will include technical, procedural, and process controls to prevent TCA laptops from becoming unintended access points;
3. Drafted, as part of the project plan, a test plan which establishes technical controls that disable a TCA laptop's logical input and output ports (Ethernet and console ports) when connected to URE's Virtual Private Network (VPN);
4. Execute, as part of the project plan, the technical controls test plan and provide evidence showing the results that the TCA laptop's logical input and output ports are disabled when connected to URE's VPN.
5. Perform, as part of the project plan, training with URE resources in the field on how to use the technical and cyber security controls on a TCA laptop; and
6. Deploy, as part of the project plan, TCA laptops to authorized TCA users.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

CIP-006-3c R1 (RFC2015015314) – OVERVIEW

ReliabilityFirst determined that URE failed to document, implement, and maintain a physical security plan as required by CIP-006-3c R1. Specifically, during a routine inspection URE discovered that an air conditioning unit was an exploitable access point into an identified PSP.

ReliabilityFirst determined the duration of the violation to be approximately 11 months, from the date URE was required to comply with CIP-006-3c R1.1, to the date URE completed its Mitigation Plan.

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The root cause was a lack of communication prior to installing the air conditioning unit. This violation involved the management practice of grid maintenance because URE failed to maintain properly its facilities.

ReliabilityFirst determined that this violation posed a minimal risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Review the violation with the facilities manager to clearly identify the issue and impacts;
2. Seal and secure the access point to the PSP;
3. Conduct a lessons learned meeting to review the violation and the root cause with the supply chain and facilities group;
4. Create and publish a new process document; and
5. Conduct training of all affected groups on the process document.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.



CIP-006-3c R5 (RFC2016015844) – OVERVIEW

ReliabilityFirst determined that URE failed to document and implement the technical and procedural controls for monitoring physical access at all access points to the PSPs 24 hours a day, seven days a week. Specifically, the power supply to a security rack was shut off during maintenance work at one of URE's facilities, and for six days afterwards the facility was not communicating with URE's headquarters.

ReliabilityFirst determined the duration of the violation to be approximately six days, from the date URE failed to monitor physical access, to the date URE restored monitoring capabilities.

The violation involved the management practices of grid maintenance and workforce management. Grid maintenance was involved because URE did not properly mitigate the risks of the maintenance work on the station. More specifically, URE's vendor properly submitted a maintenance ticket, but there was a miscommunication between groups, so URE and the vendor did not consider the security systems that operate on the same network where the maintenance activities were being performed.

ReliabilityFirst determined that this violation posed a serious and substantial risk to the reliability of the BPS.

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URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Complete repairs and re-establish security monitoring at the relevant facility;
2. Conduct PACS incident lessons learned meeting;
3. Revise security command center alarm response policy to clarify responsibilities;
4. Review current processes and practices to determine a need for alignment with roles and responsibilities;
5. Revise or create documentation regarding roles and responsibilities;
6. Provide training on new or revised policies and processes regarding PACS outage reporting, troubleshooting, and communications;
7. Develop PACS service level agreement policy document that documents responsibilities for the use, maintenance, and management of physical security controls; and
8. Approve and implement PACS service level agreement.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.



CIP-007-3a R1 (RFC2016015715) – OVERVIEW

ReliabilityFirst determined that URE failed to ensure that new Cyber Assets and significant changes to existing Cyber Assets within the ESP do not adversely affect existing cyber security controls. Specifically, a URE asset administrator performed a PACS modification, but did not complete the change and configuration management process documentation for a device that was replaced.

ReliabilityFirst determined the duration of the violation to be approximately seven months, from the date URE introduced the assets into its environment, to the date by which URE completed the change control activities.

The root cause was a lack of workforce management in that the corporate security department charged with managing the assets did not have expertise to provide technical oversight of the PACS devices.

ReliabilityFirst determined that this violation posed a minimal risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Complete changes to engineering change control process to align with CIP Version 5;

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2. Update the engineering CIP CAMS to align with the new change control process;
3. Develop CIP Version 5 baseline configuration in the engineering CAMS.
4. File and obtain approval of TFEs for the PACS to complete CIP Version 5 commissioning tasks in CAMS;
5. Develop and implement a separate security configuration procedure for relevant controllers;
6. Complete commissioning and change control tasks for assets installed at the relevant locations; and
7. Train all engineering personnel responsible for the use of CAMS for all CIP changes on related systems.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

CIP-007-3a R2 (RFC2016015714) – OVERVIEW

ReliabilityFirst determined that URE failed to establish, document, and implement a process to ensure that only those ports and services required for normal and emergency operations are enabled. Specifically, URE had multiple undocumented services with ports enabled related to its PACS, and one of those ports was unnecessary for operations.

ReliabilityFirst determined the duration of the violation to be approximately eight months, from the date URE was required to comply with CIP-007-3a R2, to the date URE completed its Mitigation Plan.

The violation involved the management practices of verification and workforce management. Verification management was involved because URE failed to verify and document that the ports and services were necessary for operations.

ReliabilityFirst determined that this violation posed a moderate risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Reassign these Cyber Assets to an asset manager capable of reviewing CIP controls;
2. Implement a new monitoring program; and
3. Verify its Cyber Vulnerability Assessment (CVA) Action Plan to remove the undocumented ports and accounts.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

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CIP-007-6 R2 (RFC2017017565) – OVERVIEW

ReliabilityFirst determined that URE failed to implement one or more documented processes that collectively include each of the applicable requirement parts in CIP-007-6 Table R2-Security Patch Management. Specifically, URE was two weeks late in completing evaluations of security patches for two Cyber Assets, which were both PACS.

ReliabilityFirst determined the duration of the violation to be approximately two weeks, from the date by which URE was required to complete the evaluations, to the date URE completed the evaluations.

The root cause was an error in calculating the date to perform the evaluation of security patches. The calculation for the next security patch evaluation was based on the implementation of the previous month's security patches rather than the previous evaluations.

ReliabilityFirst determined that this violation posed a minimal risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Conduct a meeting to discuss patch evaluation process changes with asset managers;
2. Draft proposed document changes and distribute them for comments;
3. Hold a meeting to review and finalize changes to process documents with asset managers;
4. Publish updated documents to URE's internal site; and
5. Determine if automatic notifications can be implemented based on available technology and resources.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

CIP-007-3a R3 (RFC2015015241) – OVERVIEW

ReliabilityFirst determined that URE failed to establish, document, and implement a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the ESP. Specifically, URE failed to install three sets of patches in a timely manner, and no compensating measures were documented to mitigate risk exposure.

ReliabilityFirst determined the duration of the violation to be approximately three-and-a-half months, from the date by which URE was required to implement the first set of patches, to the date URE evaluated the third set of patches.

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The root cause is that there were too many individuals involved in the patching process and roles and responsibilities were not clear. Additionally, this violation involved the management practice of asset and configuration management because URE's processes lacked sufficient controls to manage the timely implementation of changes to assets.

ReliabilityFirst determined that this violation posed a minimal risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Facilitate CIP server patching transition meetings;
2. Have the engineering department walk through the current process with the server team;
3. Take an inventory and review CIP forms by asset type/class that are completed by the engineering and security departments for CIP patching with the server team;
4. Implement a relevant patching tool and integrate it to all applicable CIP Cyber Assets;
5. Provide the server team with asset baseline information and historical patching data;
6. Have the engineering department provide a review of the previous patch evaluation performed by the server team;
7. Transition the operating system patch management duties for certain servers to the server team;
8. Update process documents to reflect common process across the multiple asset classes the server team will be handling in the future;
9. Perform an extent of condition assessment to identify any missing patches on the Cyber Assets; and
10. Remediate all missing patches on all applicable CIP Cyber Assets following the change management process.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

CIP-007-3a R3 (RFC2016015843) – OVERVIEW

ReliabilityFirst determined that URE failed to establish, document, and implement a security patch management program for tracking, evaluating, testing, and installing applicable cyber security software patches for all Cyber Assets within the ESP. Specifically, URE failed to patch a certain server and failed to evaluate software supplied and installed by URE on associated devices.

ReliabilityFirst determined the duration of the violation to be approximately one year and eight months, from the date the asset was declared a PACS, to the date URE completed its Mitigation Plan.

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The root cause was miscommunication between URE and its vendor. The vendor agreement stated that the vendor would assist in the evaluation and implementation of patches. The violation involved the management practices of external interdependencies and workforce management. External interdependencies management was involved because URE's coordination with the external vendor did not assure that patches were installed in a timely fashion. Workforce management was involved because URE staff did not properly secure or control the PACS logging system.

ReliabilityFirst determined that this violation posed a minimal risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Patch the relevant server;
2. Update procedures to include the relevant server in the server teams' procedure;
3. Incorporate the relevant server into the server team's monthly patching process;
4. Perform an extent of condition assessment to find and address any other CIP assets that have any patching deficiencies; and
5. Remedy any patching deficiencies found during the extent of condition assessment.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.



CIP-007-3a R5 (RFC2016015538) – OVERVIEW

ReliabilityFirst determined that URE failed to establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access. Specifically, URE did not change one password for a relay despite documentation stating the password was changed.

ReliabilityFirst determined the duration of the violation to be approximately three months, from 15 months from the prior password change, to the date URE changed the password.

This violation involved the management practice of verification, as URE did not have a verification process to ensure that all passwords were changed.

ReliabilityFirst determined that this violation posed a minimal risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

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1. Update the relevant driver to support a relevant relay model, which allows for the automatic update of passwords to occur annually;
2. Revise the relevant baseline testing and approval of engineering Cyber Assets process to include a step/instruction to update the relevant drivers if applicable; and
3. Train employees and contractors during a safety stand down.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

CIP-007-3a R5 (RFC2016015713) – OVERVIEW

ReliabilityFirst determined that URE failed to establish, implement, and document technical and procedural controls that enforce access authentication of, and accountability for, all user activity, and that minimize the risk of unauthorized system access. Specifically, URE had three relevant instances wherein user accounts were either not documented, had insufficient administrator rights, or lacked approved access records.

ReliabilityFirst determined the duration of the violation to be approximately one year and seven months, from the date URE was required to comply with CIP-007-3a R5, to the date URE completed its Mitigation Plan.

The violation involved the management practices of external interdependencies and workforce management. External interdependencies management was involved because URE's access provision for its external vendor did not provide the necessary approval. Workforce management was involved because URE staff did not follow procedures to document user accounts properly.

ReliabilityFirst determined that this violation posed a moderate risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Reassign the relevant Cyber Assets to an asset manager capable of reviewing CIP controls;
2. Implement a new baseline monitoring program;
3. Verify that its CVA Action Plan to remove the undocumented accounts was implemented;
4. Establish a team and conduct a series of meetings to develop a service level agreement between departments;
5. Use the service level agreement forum to determine the required permissions for each functional group;
6. Implement the appropriate access between each functional group;

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7. Include relevant security shared accounts in an URE centralized password safe;
8. Create relevant security roles in the access request system to document who has access to the password safe; and
9. Create requests and grant access through the access request system for individuals needing access to the relevant security system.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

CIP-007-6 R5 (RFC2017017566) – OVERVIEW

ReliabilityFirst determined that URE failed to implement one or more documented processes that collectively include each of the applicable requirement parts in CIP-007-6 Table R5-System Access Controls. Specifically, URE failed to change passwords at least once every 15 calendar months for a shared account that could be used for interactive user access for two Cyber Assets, both PACS.

ReliabilityFirst determined the duration of the violation to be approximately two-and-a-half months, from the date by which URE should have changed the passwords, to the date by which URE changed the passwords.

The root cause was an error during transition when the servers came under the ownership of the server team. The violation involved the management practice of verification because URE failed to verify that each PACS had current patches after the transition to the server team.

ReliabilityFirst determined that this violation posed a minimal risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Change the password for the relevant account in the related database program;
2. Discuss with groups to see if changes to process and documentation is required;
3. Establish extent of condition;
4. Update and publish any required document revisions;
5. Validate all asset password last-changed dates are synced with the relevant database program; and
6. Create a checklist for adding a new account in the relevant database program and validating the last change.

URE certified that all mitigation actions were completed.

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CIP-007-3a R6 (RFC2015015107) – OVERVIEW

ReliabilityFirst determined that URE failed to ensure that all Cyber Assets within the ESP, as technically feasible, implement automated tools or organizational process controls to monitor system events that are related to cyber security. Specifically, when URE commissioned four devices they inadvertently created firewall rules that disallowed logging.

ReliabilityFirst determined the duration of the violation to be approximately one month, from the date URE commissioned the devices, to the date the devices began sending logs to the logging tool.

The issue occurred because of a hierarchy issue where a different device was programed incorrectly and placed higher in the hierarchy, thereby blocking traffic from the four devices. The violation involved the management practices of asset and configuration management and verification. Asset and configuration management was involved because URE failed to manage changes to the devices during the commissioning process. Additionally, verification was involved because URE failed to verify that the firewall rule correction worked as intended prior to commissioning the devices.

ReliabilityFirst determined that this violation posed a minimal risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Terminate the cyber security analyst as a result of not satisfactorily performing his job responsibilities;
2. Determine the extent of condition by verifying that all assets which are defined in CCA lists are sending logs to the logging tool and are associated with the correct groups to generate alerts defined in its related process;
3. Evaluate a solution to monitor the configuration of the logging tool's log sources that controls CIP alerting and test email alerting;
4. Build a new rule in the logging tool to alert the manager of the cyber security department and the director of the networks and information security department after the logging tool has not received logs from a device in 96 hours;
5. Implement a solution to monitor the logging tool's logs;
6. Update the processes and work forms associated with change management and commission to include specific controls an asset administrator must act upon to ensure CIP-005 and CIP-007 controls are addressed in alignment with CIP Version 5;
7. Conduct a training session on newly proposed processes and work forms, and address all applicable Subject Matter Expert (SME) questions and concerns during the page-turn exercise;

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8. Correct any findings or deficiencies discovered during the extent of condition analysis conducted in Milestone 2; and
9. Complete a CIP-007 R6 Mitigation Plan closure report.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

CIP-007-3a R6 (RFC2016015752) – OVERVIEW

ReliabilityFirst determined that URE failed to ensure that all Cyber Assets within the ESP, as technically feasible, implement automated tools or organizational process controls to monitor system events that are related to cyber security. Specifically, in two instances certain programs were not sending failed login attempt notifications to URE's logging tool.

ReliabilityFirst determined the duration of the violation to be approximately six months, from the date URE failed to monitor logs in the second instance, to the date URE completed its Mitigation Plan.

The violation involved the management practices of asset and configuration management because URE did not adhere to its configuration management process.

ReliabilityFirst determined that this violation posed a moderate risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Investigate and resolve logging issues with the two relevant programs;
2. Establish a change review board;
3. Implement a certain monitoring program as a change management tool;
4. Train teams on change control process and the new monitoring program;
5. Update relevant documents for asset classes to include specific and proper logging configuration and specific testing measures to prove logging is functional;
6. Perform logging extent of condition assessment to analyze all CIP devices to ensure they are logging to the logging tool properly; and
7. Update any additional relevant documents to include specific and proper logging configuration and specific testing measures to prove logging is functional.

URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.

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CIP-014-2 R1 (RFC2015015312) – OVERVIEW

ReliabilityFirst determined that URE failed to perform an initial risk assessment and subsequent risk assessments of its transmission stations and transmission substations that meet the criteria specified in CIP-014-2. Specifically, URE did not assess one substation pursuant to Section 4.1.1 of the CIP-014-2.

ReliabilityFirst determined the duration of the violation to be approximately five days, from the date URE was required to comply with CIP-014-2 R1, to the date URE completed its risk assessment for the substation at issue.

The major contributing cause was a change to the baseline list of substations used during the evaluation process occurred (to add the substation) and was not communicated to those conducting the assessment. The violation involved the management practice of verification because URE failed to verify that each qualifying substation would be reviewed in compliance with CIP-014.

ReliabilityFirst determined that this violation posed a moderate risk to the reliability of the BPS.

URE submitted a Mitigation Plan to address the referenced violation, and committed to the following actions:

1. Perform a review of applicability Section 4.1.1 and identify all missing substations;
2. Perform risk assessments for missing substations;
3. Include a planning SME as a reviewer of CIP-002-5 BES Cyber Asset identification process results; and
4. Revise the CIP-014 R1 planning process to include a secondary review of the list of applicable substations to confirm it is complete.

Regional Entity's Basis for Penalty

According to the Settlement Agreement, ReliabilityFirst has assessed a penalty of one hundred eighty thousand dollars (\$180,000) for the referenced violations.

In reaching this determination, ReliabilityFirst considered the following factors:

1. URE had relevant prior violations of CIP-007-3a R2 and R5;
2. URE had an internal compliance program at the time of the violation, which was considered a mitigating factor in penalty determination;
3. URE self-reported 20 of the violations;

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4. URE was highly cooperative throughout the compliance enforcement process;
5. there was neither evidence of any attempt to conceal a violation nor evidence of intent to do so;
6. fifteen of the violations posed a minimal risk, six of the violations posed a moderate risk, and one violation posed a serious and substantial risk to the reliability of the BPS; and
7. there were no other mitigating or aggravating factors or extenuating circumstances that would affect the assessed penalty.

After consideration of the above factors, ReliabilityFirst determined that, in this instance, the penalty amount of one hundred eighty thousand dollars (\$180,000) is appropriate and bears a reasonable relation to the seriousness and duration of the violations.

Statement Describing the Assessed Penalty, Sanction or Enforcement Action Imposed⁴

Basis for Determination

Taking into consideration the Commission's direction in Order No. 693, the NERC Sanction Guidelines and the Commission's July 3, 2008, October 26, 2009 and August 27, 2010 Guidance Orders,⁵ the NERC BOTCC reviewed the violations on May 8, 2018 and approved the terms of the Settlement Agreement. In approving the terms of the Settlement Agreement, the NERC BOTCC reviewed the applicable requirements of the Commission-approved Reliability Standards and the underlying facts and circumstances of the violations at issue.

For the foregoing reasons, the NERC BOTCC approved the terms of the Settlement Agreement and believes that the assessed penalty of one hundred eighty thousand dollars (\$180,000) is appropriate for the violations and circumstances at issue, and is consistent with NERC's goal to promote and ensure reliability of the BPS.

⁴ See 18 C.F.R. § 39.7(d)(4).

⁵ *North American Electric Reliability Corporation*, "Guidance Order on Reliability Notices of Penalty," 124 FERC ¶ 61,015 (2008); *North American Electric Reliability Corporation*, "Further Guidance Order on Reliability Notices of Penalty," 129 FERC ¶ 61,069 (2009); *North American Electric Reliability Corporation*, "Notice of No Further Review and Guidance Order," 132 FERC ¶ 61,182 (2010).

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Pursuant to 18 C.F.R. § 39.7(e), the penalty will be effective upon expiration of the 30-day period following the filing of this Notice of Penalty with FERC, or, if FERC decides to review the penalty, upon final determination by FERC.

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Unidentified Registered Entity
May 31, 2018
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Notices and Communications: Notices and communications with respect to this filing may be addressed to the following:

| | |
|--|--|
| <p>Jason Blake*</p> <p>General Counsel & Corporate Secretary ReliabilityFirst Corporation 3 Summit Park Drive, Suite 600 Cleveland, OH 44131 jason.blake@rfirst.org (216) 503-0683 (216) 503-9207 facsimile</p> <p>Kristen M. Senk*</p> <p>Managing Enforcement Counsel ReliabilityFirst Corporation 3 Summit Park Drive, Suite 600 Cleveland, OH 44131 kristen.senk@rfirst.org (216) 503-06769 (216) 503-9207 – facsimile</p> <p>*Persons to be included on the Commission's service list are indicated with an asterisk. NERC requests waiver of the Commission's rules and regulations to permit the inclusion of more than two people on the service list.</p> | <p>Sonia C. Mendonça*</p> <p>Vice President, Deputy General Counsel, and Director of Enforcement North American Electric Reliability Corporation 1325 G Street N.W. Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile sonia.mendonca@nerc.net</p> <p>Edwin G. Kichline*</p> <p>Senior Counsel and Director of Enforcement Oversight North American Electric Reliability Corporation 1325 G Street N.W. Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile edwin.kichline@nerc.net</p> <p>Robert Goldfin*</p> <p>Associate Counsel North American Electric Reliability Corporation 1325 G Street N.W. Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile robert.goldfin@nerc.net</p> |
|--|--|

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Unidentified Registered Entity
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Conclusion

NERC respectfully requests that the Commission accept this Notice of Penalty as compliant with its rules, regulations, and orders.

Respectfully submitted,

/s/ Robert P. Goldfin

Sonia C. Mendonça
Vice President, Deputy General Counsel,
and Director of Enforcement
Edwin G. Kichline
Senior Counsel and Director of
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Robert P. Goldfin
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cc: Unidentified Registered Entity
ReliabilityFirst Corporation

163 FERC ¶ 61,233
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation

Docket Nos. NP18-11-000
NP18-12-000
NP18-13-000
NP18-14-000
NP18-15-000

NOTICE

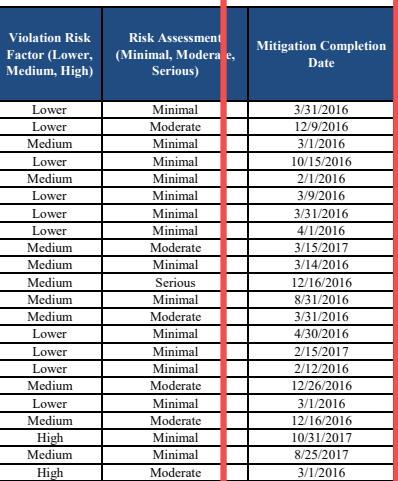
(June 29, 2018)

Take notice that the Commission will not further review, on its own motion, the following Notices of Penalty:

| <u>Docket No.</u> | <u>Filing Date</u> | <u>Registered Entity</u> |
|-------------------|--------------------|--------------------------------------|
| NP18-11-000 | May 31, 2018 | Oncor Electric Delivery Company, LLC |
| NP18-12-000 | May 31, 2018 | Connecticut Light & Power Company |
| NP18-13-000 | May 31, 2018 | Minnkota Power Cooperative, Inc. |
| NP18-14-000 | May 31, 2018 | Unidentified Registered Entity |
| NP18-15-000 | May 31, 2018 | Spreadsheet NOP |

By direction of the Commission.

Kimberly D. Bose,
Secretary.



| Filing Date | Docket Number | Regional Entity | Registered Entity | NCR ID (NERC Compliance Registry Identifier) | Total Penalty (\$) (The total penalty amount represents an aggregate amount for the filing; it does not represent an amount per violation.) | NERC Violation ID | Reliability Standard | Req | Violation Risk Factor (Lower, Medium, High) | Risk Assessment (Minimal, Moderate, Serious) | Mitigation Completion Date | Notice of No Further Review Issued |
|-------------|---------------|-----------------|--------------------------------|--|---|-------------------|----------------------|-----|---|--|----------------------------|------------------------------------|
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015014936 | CIP-003-3 | R5 | Lower | Minimal | 3/31/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015692 | CIP-003-3 | R5 | Lower | Moderate | 12/9/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015313 | CIP-003-3 | R6 | Medium | Minimal | 3/1/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015717 | CIP-003-3 | R6 | Lower | Minimal | 10/15/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015008 | CIP-004-3a | R3 | Medium | Minimal | 2/1/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015716 | CIP-004-3a | R4 | Lower | Minimal | 3/9/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015009 | CIP-004-3a | R4 | Lower | Minimal | 3/31/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015402 | CIP-004-3a | R4 | Lower | Minimal | 4/1/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016016474 | CIP-005-3a | R1 | Medium | Moderate | 3/15/2017 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015314 | CIP-006-3c | R1 | Medium | Minimal | 3/14/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015844 | CIP-006-3c | R5 | Medium | Serious | 12/16/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015715 | CIP-007-3a | R1 | Medium | Minimal | 8/31/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015714 | CIP-007-3a | R2 | Medium | Moderate | 3/31/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015241 | CIP-007-3a | R3 | Lower | Minimal | 4/30/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015843 | CIP-007-3a | R3 | Lower | Minimal | 2/15/2017 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015538 | CIP-007-3a | R5 | Lower | Minimal | 2/12/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015713 | CIP-007-3a | R5 | Medium | Moderate | 12/26/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015107 | CIP-007-3a | R6 | Lower | Minimal | 3/1/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2016015752 | CIP-007-3a | R6 | Medium | Moderate | 12/16/2016 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2017017565 | CIP-007-6 | R2 | High | Minimal | 10/31/2017 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2017017566 | CIP-007-6 | R5 | Medium | Minimal | 8/25/2017 | X |
| 5/31/2018 | NP18-14-000 | RF | Unidentified Registered Entity | NCRXXXXX | \$180,000 | RFC2015015312 | CIP-014-2 | R1 | High | Moderate | 3/1/2016 | X |

Federal Energy Regulatory Commission
Washington, D.C. 20426
February 26, 2021

Re: FOIA FY19-30 and FOIA
FY19-19 (Rolling)
Response Letter – Denial

VIA ELECTRONIC MAIL ONLY

Michael Mabee
6937 Nine Mile Bridge Road
Fort Worth, TX 76135
CivilDefenseBook@gmail.com

Dear Mr. Mabee:

This is a rolling response to your correspondence received in January 2019, in which you requested information pursuant to the Freedom of Information Act (FOIA), and the Federal Energy Regulatory Commission's (Commission) FOIA regulations. *See* 5 U.S.C. § 552; 18 C.F.R. § 388.108 (2020). Your request is for the names of the Unidentified Registered Entities (UREs) associated with various public dockets, including: NP11-247; NP11-262; NP11-263; NP11-264; NP17-21; NP17-25; NP18-2; NP18-7; NP18-14; and NP18-15. Based on staff's internal assessment, disclosure of the UREs associated with these dockets is not appropriate. Accordingly, as discussed further below, the identities will be withheld pursuant to Exemption 3 and Exemption 7(F).

Identities of UREs

Before making a determination as to whether this information is appropriate for release under FOIA, a case-by-case assessment of the requested information must consider the following: the nature of the Critical Infrastructure Protection (CIP) violation, including whether there is a Technical Feasibility Exception involved that does not allow the Unidentified Registered Entity to fully meet the CIP requirements; whether vendor-related information is contained in the Notices of Penalty (NOP); whether mitigation is complete; the content of the public and non-public versions of the NOP; the extent to which the disclosure of the identity of the URE and other information would be useful to someone seeking to cause harm; whether a successful audit has occurred since the violation(s); whether the violation(s) was administrative or technical in nature; and the length of time that has elapsed since the filing of the public NOP. An application of these factors will dictate whether a particular FOIA exemption, including 7(F) and/or Exemption 3, is appropriate. *See Garcia v. U.S. DOJ*, 181 F. Supp. 2d 356, 378 (S.D.N.Y. 2002) ("In evaluating the validity of an agency's invocation of Exemption

FOIA FY19-30 and FOIAFY19-19 - 2 -

7(F), the court should within limits, defer to the agency's assessment of danger.”) (citation and internal quotations omitted).

Based on the application of the various factors discussed above, I conclude that disclosing the identities of the UREs associated with these dockets, would create a risk of harm or detriment to life, physical safety, or security because the specified UREs could become the target of a potentially bad actor. Therefore, the information is protected from disclosure under FOIA Exemption 7(F). *See* 5 U.S.C. § 552(b)(7)(F) (protecting law enforcement information where release “could reasonably be expected to endanger the life or physical safety of any individual.”). Additionally, the information is protected under FOIA Exemption 3. *See* Fixing America's Surface Transportation Act, Pub. L. No. 114-94, § 61003 (2015) (specifically exempting the disclosure of CEII and establishing applicability of FOIA Exemption 3, 5 U.S.C. § 552(b)(3)). Accordingly, the names of the UREs associated with the foregoing dockets will not be disclosed.

On November 18, 2019, you filed suit in the U.S. District Court for the District of Columbia asserting claims in connection with this FOIA request. *See Mabee v. Fed. Energy Reg. Comm’n*, Civil Action No. 19-3448 (KBJ) (D.D.C.). Because this FOIA request is currently in litigation, this letter does not contain information regarding administrative appeal of the response to the FOIA request.

For any further assistance or to discuss any aspect of your request, you may contact Assistant United States Attorney April D. Seabrook by email at april.seabrook@usdoj.gov, by phone at (202) 252-2525, or by mail at United States Attorney’s Office – Civil Division, U.S. Department of Justice, 555 Fourth Street, N.W., Washington, D.C. 20530.

Sincerely,

MARY O'DRISCOLL

Digitally signed by MARY
O'DRISCOLL
Date: 2021.02.26 14:16:17 -05'00'

Mary O'Driscoll
Acting Director
Office of External Affairs

FOIA FY19-30 and FOIAFY19-19

- 3 -

Cc Mr. Peter Sorenson, Esq.
Counsel for Mr. Mabee
petesorenson@gmail.com

James M. McGrane
Senior Counsel
North American Electric Reliability Corporation
1325 G Street N.W. Suite 600
Washington, D.C. 20005
James.McGrane@nerc.net

Exhibit 117

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

NRC Confirmatory Order dated January 26, 2022.

Showing that a violator of a physical security related violation was publicly named.



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

January 26, 2022

EA-21-041

Mr. Kelly Trice
President
Holtec Decommissioning International, LLC
1 Holtec Blvd., Krishna P. Singh Technology Campus
Camden, NJ 08104

**SUBJECT: CONFIRMATORY ORDER RELATED TO OYSTER CREEK NUCLEAR
GENERATING STATION – NRC INVESTIGATION REPORT I-2020-007; NRC
INSPECTION REPORT NOS. 05000219/2021402 & 07200015/2021401**

Dear Mr. Trice:

The enclosed Confirmatory Order is being issued to Holtec Decommissioning International, LLC as a result of a successful alternative dispute resolution (ADR) mediation session. The commitments in the Confirmatory Order were made by your representatives as part of a settlement agreement between HDI and the U.S. Nuclear Regulatory Commission (NRC). The mediation and settlement agreement was related to apparent violations (AVs) of NRC requirements at HDI's Oyster Creek Nuclear Generating Station (Oyster Creek) described in Inspection Report Nos. 05000219/2021402 & 07200015/2021401 enclosed with an NRC letter dated July 28, 2021 (ML21176A049).¹ The report documented the results of an investigation that evaluated whether a (now-former) training superintendent at Oyster Creek, who was also responsible for performing armorer duties, deliberately failed to perform firearms maintenance activities and falsified records related to those activities.

In the July 28, 2021 letter, the NRC informed HDI that the NRC identified three AVs associated with the investigation, and that two of the AVs were under consideration for escalated enforcement action, including a civil penalty, in accordance with the NRC Enforcement Policy. In the letter, the NRC provided HDI the option of responding to the apparent violations in writing, participating in a pre-decisional enforcement conference, or requesting ADR with the NRC in an attempt to resolve the issue. In response to our letter, HDI requested ADR. An ADR mediation session was consequently held on October 14, 2021, and a preliminary settlement agreement was reached.

As evidenced by the signed "Consent and Hearing Waiver Form" (Enclosure 1), dated January 19, 2022, you agreed to issuance of a Confirmatory Order (Enclosure 2). The Confirmatory Order confirms the commitments made as part of the preliminary settlement agreement. As part of this agreement, HDI has committed to a number of significant actions that are expected to improve the security performance of the fleet. The NRC notes that, prior to

¹ Designation in parentheses refers to an Agency-wide Documents Access and Management System (ADAMS) accession number. Unless otherwise noted, documents referenced in this letter are publicly-available using the accession number in ADAMS.

K. Trice

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this ADR session, HDI initiated some measures to address the issues raised by the apparent violations. The NRC will continue to monitor HDI's progress in this area. As described in the Confirmatory Order, in consideration of these commitments, the NRC agreed to issue a reduced civil penalty of \$50,000. HDI must pay the civil penalty in accordance with Section V of the Order.

The NRC will conduct follow-up inspections, as necessary, to ascertain whether the actions taken by HDI to address the commitments of the Confirmatory Order, are complete and effective. Our inspection activities will be guided by Inspection Procedure 92702, "Follow-up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, and Orders."

Pursuant to Section 223 of the Atomic Energy Act of 1954, as amended, any person who willfully violates, attempts to violate, or conspires to violate, any provision of this Confirmatory Order shall be subject to criminal prosecution as set forth in that section. Violation of this Confirmatory Order may also subject the person to civil monetary penalty.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 2.390, of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be made available electronically for public inspection in the NRC Public Document Room and from the NRC's Agencywide Document Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. The Confirmatory Order will also be published in the *Federal Register*. The NRC also includes significant enforcement actions, including Confirmatory Orders, on its Web site at <http://www.nrc.gov/reading-rm/doc-collections/enforcement/actions/>.

Sincerely,

**Raymond
K. Lorson**

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Raymond K. Lorson
Date: 2022.01.26
12:44:45 -05'00'

Raymond K. Lorson
Deputy Regional Administrator

Docket No. 50-219
License No. DPR-16

Enclosures:

1. Consent and Hearing Wavier
2. Confirmatory Order
3. Civil Penalty Invoice No. EA-21-041
4. NUREG/BR-0254, "Payment Methods"

cc: Distribution via ListServ

Exhibit 118

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

NRC Notice of Violation dated November 18, 1997.

Showing that a violator of a nuclear safety regulations was publicly named.



EA-97-382 - Arkansas Nuclear 1 & 2 (Entergy Operations, Inc.)

November 18, 1997

EA 97-382

C. Randy Hutchinson, Vice President
Operations
Arkansas Nuclear One
Entergy Operations, Inc.
1448 S.R. 333
Russellville, Arkansas 72801-0967

SUBJECT: NOTICE OF VIOLATION (NRC INSPECTION REPORT 50-313/97-14; 50-368/97-14)

Dear Mr. Hutchinson:

This is in reference to the predecisional enforcement conference held in the NRC's Arlington, Texas office on September 26, 1997. The conference was conducted to discuss three apparent violations of NRC requirements related to inspections of steam generator tubes at Arkansas Nuclear One, Units 1 and 2. The results of our inspection were discussed with your staff during a telephonic exit briefing conducted on August 8, 1997, and were documented in the subject NRC Inspection Report, which was issued September 12, 1997. After the September 26 conference, ANO provided further information and clarification during a telephone discussion held on October 2, 1997.

The three apparent violations described in the inspection report involved: (1) a failure to comply with 10 CFR Part 50 Appendix B Criterion IX in the use of data in bobbin coil sizing qualification criteria that did not conform to the requirements of the selected qualification method; (2) the failure to remove Unit 2 tubes from service which contained flaws that exceeded the plugging limit of the Technical Specifications; and (3) the lack of prompt corrective action in November 1995 prior to returning potentially defective sleeved tubes to service.

During the September 26 conference, Entergy expressed disagreement with the first apparent violation, contending that Entergy's sizing qualification for intergranular attack (IGA) met the provisions of appropriate industry qualification processes (EPRI Appendix "H"), and therefore Entergy was in compliance with 10 CFR Part 50 Appendix B. With regard to the second apparent violation, which involved Unit 2 steam generators, Entergy agreed that the violation occurred but contended that the violation warranted treatment as a non-cited violation. Entergy also disputed the third apparent violation, which is discussed below.

The NRC considered Entergy's arguments and has concluded that violations of NRC requirements occurred. The violations are cited in the enclosed Notice of Violation (Notice). Based on the discussions at the conference, we have modified the first violation to state that Entergy's inservice inspections of Unit 1 steam generators were not appropriately controlled and accomplished to identify tube defects that exceeded the technical specification plugging limit. The second violation involves Unit 2 steam generator tubes, with defects greater than the technical specification plugging limit, that were improperly considered operable.

Although these violations involve steam generators of different designs and different IGA flaw sizing methodologies, the violations are similar in that your methods for sizing IGA and tubing degradation in both Units 1 and 2 steam generators were shown to have been inadequate. The actual safety consequence of these violations is low because no significant leakage occurred as a result of tube leaks. These issues are of regulatory significance because of the programmatic nature of the problem; that is, you relied on methods which were incapable of detecting flaws greater than the plugging limit, and as a result, operated Units 1 and 2 with steam generators with tubes containing flaws that exceeded the technical specification plugging limit of 40 percent through wall (TW). Therefore, these two violations have been categorized in the aggregate in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600, as a Severity Level III problem.

In accordance with the Enforcement Policy, a base civil penalty in the amount of \$55,000 is considered for a Severity Level III problem. Because your facility has been the subject of escalated enforcement actions within the last 2 years¹ [N 1], the NRC considered whether credit was warranted for *Identification* and *Corrective Action* in accordance with the civil penalty assessment process in Section VI.B.2 of the Enforcement Policy. Since

Entergy identified both issues, the NRC has determined that Entergy is deserving of *Identification* credit. Further, the NRC has determined that Entergy is deserving of *Corrective Action* credit. Entergy's corrective actions for the first violation included declaring the steam generators inoperable, notifying the NRC, requesting (and being granted) a Notice of Enforcement Discretion from the NRC, administratively precluding IGA sizing, and investigating the cause of the problem. Entergy's corrective actions to the second violation included reviewing more "no detectable degradation" determinations to verify the quality of the 2R12 analyses, performing enhanced inservice inspections of indications, repairing the eggcrate cracks, enhancing training, and providing additional oversight of the inservice inspections.

Therefore, to encourage prompt identification and comprehensive correction of violations, I have been authorized not to propose a civil penalty in this case. However, significant violations in the future could result in a civil penalty.

The third violation cited in the enclosed notice involves Entergy's failure to take prompt corrective actions prior to returning to service potentially defective sleeved tubes exhibiting weld zone eddy current indications. At the conference, Entergy representatives expressed disagreement with this violation, contending that sufficient technical basis existed (including ultrasonic testing and visual testing) to justify use of the sleeves as-is. Further, Entergy representatives noted that, after re-inspection, only one of 28 indications was identified for repair based on new acceptance criteria and that all 28 indications met structural and leakage requirements. Notwithstanding Entergy's argument that the structural integrity of the sleeves was maintained, the NRC's position is that Entergy had an indication of a condition adverse to quality, and it took inadequate corrective actions. Specifically, your actions (in October 1995, during 2R11) were not adequate to evaluate defects that existed at the time, nor did you perform an operability assessment at the time. Therefore, in accordance with the its Enforcement Policy, the NRC has classified this violation at Severity Level IV.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be placed in the NRC Public Document Room (PDR).

Sincerely, Ellis W. Merschoff Regional Administrator

Dockets: 50-313 & 50-368

Licenses: DPR-51 & NPF-6

cc w/Enclosure:

Executive Vice President

& Chief Operating Officer

Entergy Operations, Inc.

P.O. Box 31995

Jackson, Mississippi 39286-1995

Vice President

Operations Support

Entergy Operations, Inc.

P.O. Box 31995

Jackson, Mississippi 39286

Manager, Washington Nuclear Operations

ABB Combustion Engineering Nuclear Power

12300 Twinbrook Parkway, Suite 330

Rockville, Maryland 20852

County Judge of Pope County

Pope County Courthouse

Russellville, Arkansas 72801

Winston & Strawn

1400 L Street, N.W.

Washington, D.C. 20005-3502

David D. Snellings, Jr., Director

Division of Radiation Control and

Emergency Management

Arkansas Department of Health

4815 West Markham Street, Mail Slot 30

Little Rock, Arkansas 72205-3867

Manager
Rockville Nuclear Licensing
Framatome Technologies
1700 Rockville Pike, Suite 525
Rockville, Maryland 20852

NOTICE OF VIOLATION

Entergy Operations, Inc. Dockets: 50-313; 50-368 Arkansas Nuclear One Licenses: DPR-51; NPF-6 EA 97-382
During an NRC inspection conducted on May 27 through August 8, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

A. Criterion IX of Appendix B to 10 CFR Part 50 states, in part, "Measures shall be established to assure that special processes, including. . . nondestructive testing, are controlled and accomplished. . . using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements."

Unit 1 Technical Specification 4.18.2a. states, in part, "Inservice inspection of steam generator tubing shall include nondestructive examination by eddy-current testing or other equivalent. . . ." Technical Specification 4.18.5b, through Amendment No. 134 to Facility Operating License No. DPR-51, states, in part, "The steam generator shall be determined operable after completing the corresponding actions (plug or sleeve all tubes exceeding the plugging limit and all tubes containing through-wall cracks) required by Table 4.18-2. . . ." Table 4.18-2 requires defective tubes to be plugged or sleeved. Technical Specification 4.18.5a defines a defect as an imperfection which exceeds the plugging limit, a defective tube as one containing a defect in its pressure boundary, and the plugging limit as equal to 40 percent of the nominal tube wall thickness.

Unit 2 Technical Specification 4.4.5.0 requires that each steam generator shall be demonstrated operable by performance of an augmented inservice inspection program. Technical Specification 4.4.5.2 states, in part, ". . . the inspected tubes shall be verified acceptable per the acceptance criteria of Specification 4.4.5.4. . . ." Technical Specification 4.4.5.4b. states, in part, "The steam generator shall be determined operable after completing the corresponding actions (plug or repair all tubes exceeding the plugging or repair limit and all tubes containing through-wall cracks) required by Table 4.4-2. . . ." Table 4.4-2 requires defective tubes to be plugged or sleeved. Technical Specification 4.4.5.4a. defines a defect as an imperfection which exceeds the plugging limit, a defective tube as one containing a defect, and the plugging limit as equal to 40 percent of the nominal parent tube wall thickness.

1. *Contrary to the above, from October 25, 1996 (the date of return to power operations following outage 1R13) through April 9, 1997 (the date of approval of enforcement discretion), eddy current examinations of Unit 1 steam generator tubes performed during Unit 1 Refueling Outage 1R13 were not appropriately controlled and accomplished to identify tube defects in Unit 1 steam generator tubes that could have exceeded the technical specifications plugging limit. Specifically, the licensee inadequately controlled its eddy current testing and sizing technique used during Unit 1 Refueling Outage 1R13 to measure the depth of intergranular attack present in steam generator tubing at locations within the upper tube sheet. All tubes that were found by use of this technique to contain intergranular attack with a depth less than 40 percent of the nominal tube wall thickness were allowed to remain in service on return to power operations on October 25, 1996. Subsequent metallographic examination of three tubes exhibiting upper tube sheet intergranular attack, which were removed from Steam Generator B during the refueling outage, found actual flaw depths that exceeded the depths predicted by the sizing technique. This created the potential for flaws being left in service up to April 9, 1997 (i.e., the date of enforcement discretion approval) that exceeded the plugging limit of the Technical Specifications. (01013)*

2. *Contrary to the above, from January through May 1997, adequate measures were not taken to assure that inservice inspections of Unit 2 steam generators tubes were controlled and accomplished to identify defects exceeding the plugging limit. Reevaluation, in May 1997, of data obtained during Unit 2 Outage 2F96-1 bobbin coil examination (performed before January 1997) identified 76 tubes in Steam Generator A and 122 tubes in Steam Generator B that had defects in excess of the plugging limit of the Technical Specifications. (01023)*

These violations represent a Severity Level III problem (Supplement I) (50-313/9714-01).

B. Criterion XVI of Appendix B to 10 CFR Part 50 states, in part, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. . . ."

Contrary to the above, in November 1995, the licensee failed to take adequate corrective actions, during Refueling Outage 2R11, after identifying defects in welded sleeves in Unit 2 steam generators tubing, and prior to returning these potentially defective Unit 2 sleeved tubes to service. Although the licensee performed additional testing (ultrasonic and visual testing), these were inadequate to evaluate defects that existed at the time, and the licensee did not perform an operability assessment at that time. (02014)

This is a Severity Level IV violation (Supplement I) (50-368/9714-03).

Pursuant to the provisions of 10 CFR 2.201, Entergy Operations, Inc. (Licensee) is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violations, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Arlington, Texas
this 18th day of November 1997

1. A Severity Level III problem and a \$50,000 civil penalty was issued on April 9, 1997, involving fire protection inadequacies and the plant staff's inadequate response to indications of a fire (EA 96-512).

Page Last Reviewed/Updated Wednesday, March 24, 2021

Exhibit 119

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

February 26, 2021 FERC determination letter in FOIA 2019-30.

Showing FERC denied my request to release the name associated with Docket NP18-7-000.

Federal Energy Regulatory Commission
Washington, D.C. 20426
February 26, 2021

Re: FOIA FY19-30 and FOIA
FY19-19 (Rolling)
Response Letter – Denial

VIA ELECTRONIC MAIL ONLY

Michael Mabee
6937 Nine Mile Bridge Road
Fort Worth, TX 76135
CivilDefenseBook@gmail.com

Dear Mr. Mabee:

This is a rolling response to your correspondence received in January 2019, in which you requested information pursuant to the Freedom of Information Act (FOIA), and the Federal Energy Regulatory Commission's (Commission) FOIA regulations. *See* 5 U.S.C. § 552; 18 C.F.R. § 388.108 (2020). Your request is for the names of the Unidentified Registered Entities (UREs) associated with various public dockets, including: NP11-247; NP11-262; NP11-263; NP11-264; NP17-21; NP17-25; NP18-2; NP18-7; NP18-14; and NP18-15. Based on staff's internal assessment, disclosure of the UREs associated with these dockets is not appropriate. Accordingly, as discussed further below, the identities will be withheld pursuant to Exemption 3 and Exemption 7(F).

Identities of UREs

Before making a determination as to whether this information is appropriate for release under FOIA, a case-by-case assessment of the requested information must consider the following: the nature of the Critical Infrastructure Protection (CIP) violation, including whether there is a Technical Feasibility Exception involved that does not allow the Unidentified Registered Entity to fully meet the CIP requirements; whether vendor-related information is contained in the Notices of Penalty (NOP); whether mitigation is complete; the content of the public and non-public versions of the NOP; the extent to which the disclosure of the identity of the URE and other information would be useful to someone seeking to cause harm; whether a successful audit has occurred since the violation(s); whether the violation(s) was administrative or technical in nature; and the length of time that has elapsed since the filing of the public NOP. An application of these factors will dictate whether a particular FOIA exemption, including 7(F) and/or Exemption 3, is appropriate. *See Garcia v. U.S. DOJ*, 181 F. Supp. 2d 356, 378 (S.D.N.Y. 2002) (“In evaluating the validity of an agency's invocation of Exemption

FOIA FY19-30 and FOIAFY19-19 - 2 -

7(F), the court should within limits, defer to the agency's assessment of danger.”) (citation and internal quotations omitted).

Based on the application of the various factors discussed above, I conclude that disclosing the identities of the UREs associated with these dockets, would create a risk of harm or detriment to life, physical safety, or security because the specified UREs could become the target of a potentially bad actor. Therefore, the information is protected from disclosure under FOIA Exemption 7(F). *See* 5 U.S.C. § 552(b)(7)(F) (protecting law enforcement information where release “could reasonably be expected to endanger the life or physical safety of any individual.”). Additionally, the information is protected under FOIA Exemption 3. *See* Fixing America's Surface Transportation Act, Pub. L. No. 114-94, § 61003 (2015) (specifically exempting the disclosure of CEII and establishing applicability of FOIA Exemption 3, 5 U.S.C. § 552(b)(3)). Accordingly, the names of the UREs associated with the foregoing dockets will not be disclosed.

On November 18, 2019, you filed suit in the U.S. District Court for the District of Columbia asserting claims in connection with this FOIA request. *See Mabee v. Fed. Energy Reg. Comm’n*, Civil Action No. 19-3448 (KBJ) (D.D.C.). Because this FOIA request is currently in litigation, this letter does not contain information regarding administrative appeal of the response to the FOIA request.

For any further assistance or to discuss any aspect of your request, you may contact Assistant United States Attorney April D. Seabrook by email at april.seabrook@usdoj.gov, by phone at (202) 252-2525, or by mail at United States Attorney’s Office – Civil Division, U.S. Department of Justice, 555 Fourth Street, N.W., Washington, D.C. 20530.

Sincerely,

MARY O'DRISCOLL

Digitally signed by MARY
O'DRISCOLL
Date: 2021.02.26 14:16:17 -05'00'

Mary O'Driscoll
Acting Director
Office of External Affairs

FOIA FY19-30 and FOIAFY19-19 - 3 -

Cc Mr. Peter Sorenson, Esq.
Counsel for Mr. Mabee
petesorenson@gmail.com

James M. McGrane
Senior Counsel
North American Electric Reliability Corporation
1325 G Street N.W. Suite 600
Washington, D.C. 20005
James.McGrane@nerc.net

Exhibit 120

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

FERC Order 135 FERC ¶ 61,118

Showing that FERC identified Midwest Independent Transmission System Operator, Inc. (MISO) as the “Unidentified registered Entity” cited in NP11-59-000. (The name was denied to me in Exhibit 111.)

135 FERC ¶ 61,118
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Jon Wellinghoff, Chairman;
Marc Spitzer, Philip D. Moeller,
John R. Norris, and Cheryl A. LaFleur.

Midwest Independent Transmission System
Operator, Inc.

Docket No. ER11-2798-000

ORDER ON RECOVERY OF PENALTY ASSESSMENTS

(Issued May 6, 2011)

1. On January 28, 2011, as supplemented on March 9, 2011, Midwest Independent Transmission System Operator, Inc. (MISO) requested, pursuant to section 205 of the Federal Power Act (FPA),¹ Part 35 of the Commission's regulations,² and Schedule 34, "Allocation of Costs Associated with Reliability Penalty Assessments" (Schedule 34) to MISO's Open Access Transmission, Energy and Operating Reserve Markets Tariff (Tariff), the Commission's approval to recover \$7,000 in penalty costs from Tariff customers. These costs result from a settlement agreement (Settlement Agreement) entered into by and between MISO and ReliabilityFirst to resolve outstanding issues arising from a non-public investigation.³

2. For the reasons discussed below, we grant MISO's request to recover the penalty costs assessed in the Settlement Agreement and its proposed allocation methodology for recovery of such penalty costs from Tariff Customers in accordance with Schedule 34 of the Tariff.

¹ 16 U.S.C. § 824d (2006).

² 18 C.F.R. Part 35 (2010).

³ The Abbreviated Notice of Penalty (NOP) was filed by the North American Electric Reliability Corporation (NERC) on December 22, 2010 in Docket No. NP11-59-000.

I. Background

3. After issuance of the Commission's order providing guidance concerning cost recovery for penalties which may be assessed against Regional Transmission Organizations and Independent System Operators for non-compliance with NERC's Reliability Standards,⁴ MISO submitted a section 205 filing to the Commission proposing Schedule 34 to its Tariff. The Commission conditionally accepted MISO's Schedule 34, subject to a compliance filing, finding that it complied with the Guidance Order and provided a reasonable mechanism for the recovery of a monetary penalty assessed against MISO for a NERC Reliability Standard violation.⁵ Under Schedule 34, MISO may seek to directly assign penalty costs to Tariff Customers or Members if, as the result of the Compliance Monitoring and Enforcement Process, NERC or a Regional Entity finds that such Tariff Customers or Members directly contributed to or were a root cause(s) of a confirmed violation. Where penalties cannot be directly assigned to a particular, identifiable Tariff Customer or Member or are the fault of MISO itself, MISO may seek Commission approval to recover penalty costs from all Tariff Customers and/or Members pursuant to a Commission-approved methodology for allocation of penalty costs.

4. The \$7,000 in penalty costs at issue resulted from the Settlement Agreement resolving outstanding issues concerning NERC Critical Infrastructure Protection Reliability Standard CIP-004-1, Requirements 3.2 and 3.3.⁶ The NOP did not disclose MISO's identity, and MISO redacted information in its original January 28 filing that would reveal its identity. However, to address concerns relating to the notice requirements of the FPA, MISO submitted a supplemental filing on March 9, 2010 that included the originally non-public, unredacted version of its January 28 filing.

5. In its filing, MISO describes its corporate compliance program, and notes that, since 2008, its incentive compensation has included a specific incentive target directly tying a component of incentive compensation to reliability and compliance performance. MISO states that the issues that were the subject of the NOP were neither intentional nor grossly negligent, but were simply an administrative oversight by staff-level personnel. As a non-profit entity for which all funds received have been allocated to specific uses,

⁴ *Reliability Standard Compliance and Enforcement in Regions with Regional Transmission Organizations or Independent System Operators*, 122 FERC ¶ 61,247 (2008) (Guidance Order).

⁵ *Midwest Independent Transmission System Operator, Inc.*, 128 FERC ¶ 61,229 (2009) (September 8 Order).

⁶ These requirements pertain to updating and documenting personnel risk assessments.

MISO states that it has no reserve from which it can pay the penalty assessed in the NOP without Commission approval.

II. MISO's Request

6. MISO seeks the Commission's approval to recover the penalty costs assessed under the Settlement Agreement using the proposed method for allocating the penalty costs. It proposes to allocate the penalty costs on a *pro rata* basis to all Tariff Customers based upon Schedule 10 billing determinants calculated during the calendar month immediately following the month in which its filing is approved by the Commission. Each Tariff Customer's share of the penalty will be calculated by dividing its total Network Load for the month or its total Reserved Capacity for Point-to-Point Transmission Service for the month (whichever is applicable) by the sum of the total Network Load for all Network Integration Transmission Service for the month and total Reserved Capacity for all Point-to-Point Transmission Service for that month, as those terms are defined in the Tariff. MISO anticipates that the requested allocation will result in a charge of less than one one-thousandth of one cent per megawatt hour.

III. Notice, Interventions, and Responsive Pleadings

7. On January 31, 2011, notice of the January 28 filing was published in the *Federal Register*, 76 Fed. Reg. 6775 (2011), with interventions or protests due on or before February 22, 2011. Timely motions to intervene were filed by Exelon Corporation and MISO Transmission Owners (MISO TO).⁷ Timely motions to intervene and protests were filed by American Municipal Power, Inc. (AMP), the Organization of MISO States (OMS), and Wisconsin Electric Power Company (Wisconsin Electric). Consumers

⁷ The MISO Transmission Owners for this filing consist of: Ameren Services Company, as agent for Union Electric Company; Ameren Illinois Company; American Transmission Company LLC; City Water, Light & Power (Springfield, IL); Dairyland Power Cooperative; Duke Energy Corporation for Duke Energy Ohio, Inc., Duke Energy Indiana, Inc., and Duke Energy Kentucky, Inc.; Great River Energy; Hoosier Energy Rural Electric Cooperative, Inc.; Indiana Municipal Power Agency; Indianapolis Power & Light Company; International Transmission Company; ITC Midwest LLC; Michigan Electric Transmission Company, LLC; Michigan Public Power Agency; MidAmerican Energy Company; Minnesota Power (and its subsidiary Superior Water, L&P); Montana-Dakota Utilities Co.; Northern Indiana Public Service Company; Northern States Power Company, a Minnesota corporation, and Northern States Power Company, a Wisconsin corporation, subsidiaries of Xcel Energy Inc.; Northwestern Wisconsin Electric Company; Otter Tail Power Company; Southern Illinois Power Cooperative; Southern Indiana Gas & Electric Company; Southern Minnesota Municipal Power Agency; Wabash Valley Power Association, Inc.; and Wolverine Power Supply Cooperative, Inc.

Energy Company (CECo) filed what was, at that time, a motion to intervene out-of-time. MISO and MISO TOs filed answers. Notice of the March 9 filing was published in the *Federal Register*, 76 Fed. Reg. 14,965 (2011), with interventions or protests due on or before March 30, 2011. Duke Energy Corporation filed a timely motion to intervene. OMS filed a comment and answer.

IV. Discussion

A. Procedural Matters

8. Pursuant to Rule 214 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2010), the notice of intervention and timely, unopposed motions to intervene serve to make the entities that filed interventions parties to this proceeding.

9. Rule 213(a)(2) of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2) (2010), prohibits an answer to a protest or answer unless otherwise ordered by the decisional authority. We will accept the answers from MISO TOs, MISO and OMS because they have provided information that assisted us in our decision-making process.

B. Substantive Matters

1. Comments and Protests

10. In its protest, Wisconsin Electric contends that the redacted version of MISO’s January 28 filing does not provide enough information for the public and interested parties to assess the proposal and therefore should be rejected because it does not satisfy the notice requirements to affected customers.⁸ Alternatively, Wisconsin Electric states that, if the Commission deems it appropriate to act on the filing, the proposed allocation of the penalty costs is not broad enough to encompass all of the customers taking service provided by MISO. Consequently, Wisconsin Electric argues that there could be other customers receiving services who should also share in the penalty cost, such as Reliability Coordination Customers⁹ and Transmission Owners.

11. In its protest, AMP also argues that the January 28 filing is inappropriately redacted, and it is unjust and unreasonable to allocate NERC penalty costs without giving notice to the affected parties of a charge pursuant to section 35.3 of the Commission’s

⁸ Wisconsin Electric Protest at 3.

⁹ Section 1.559 of the Tariff defines “Reliability Coordination Customer” as “any entity taking Reliability Coordination Service under Part I of Module F of the Tariff.”

regulations.¹⁰ AMP further contends that redacting such information as Tariff, Schedule and penalty amount prevents parties from assessing whether they are being charged just and reasonable rates, and the Commission should therefore discourage such practices.

12. OMS protests the January 28 filing on the grounds that it is excessively redacted and therefore fails to satisfy the requirement of section 205 of the Federal Power Act that tariff changes can be made only with notice to affected customers.¹¹ Additionally, OMS is concerned with the policy of allowing a not-for-profit entity to pass through the costs of NERC penalties because it results in a disincentive for such entity to comply with Reliability Standards. Therefore, OMS requests that the Commission either reject the January 28 filing or set it for hearing.¹²

2. Answers

13. In its answer, MISO explains that it is not authorized to use any revenues collected through its current funding rate schedules to pay penalty costs and therefore argues that the Commission must approve the January 28 filing in order for it to discharge its obligations to NERC and ReliabilityFirst.¹³ In response to OMS' request for the filing to be set for hearing, MISO states that its recovery of the penalty costs is justified, and it acted in the best interest of stakeholders by agreeing to a settlement which avoided potentially lengthy and costly litigation. In response to Wisconsin Electric's claim that the proposed allocation is not broad enough, MISO states that its allocation methodology is fair because it attempts to balance the desire for a broad allocation with the need for administrative efficiencies, especially for a penalty as small as the one that MISO is seeking to collect.¹⁴ In response to the protestors' comments that MISO failed to provide adequate notice, MISO disagrees and states that it complied with the conflicting requirements of section 205 and Schedule 34 of the Tariff by submitting both a redacted, public version and an un-redacted, non-public version of the January 28 filing.¹⁵ MISO also states that the January 28 filing alerted interested parties that a non-public filing had been provided to the Commission and that any interested party could have requested it

¹⁰ AMP Protest at 4-5; *see* 18 C.F.R. § 35.3 (2010).

¹¹ OMS Protest at 2.

¹² *Id.* at 3.

¹³ MISO Answer at 2.

¹⁴ *Id.* at 6.

¹⁵ *Id.* at 7.

from MISO since the public filing was posted on the MISO website.¹⁶ Further, MISO requests that the Commission provide guidance regarding submissions of a cost recovery filing that complies with both the notice requirements of Section 205 of the FPA and the confidentiality requirements of 18 C.F.R. § 39.7(b)(4) (2010).¹⁷

14. In their answer, MISO TOs support Wisconsin Electric's contention that the penalty costs should be allocated to Reliability Coordination Customers since they are defined under the MISO Tariff as Tariff Customers.¹⁸ However, MISO TOs disagree with the contention that a portion of the penalty costs should be allocated to Transmission Owners. According to MISO TOs, the Commission required MISO to modify section 3, in its order approving Schedule 34, to state that penalty costs could be recovered from Tariff Customers and/or Members.¹⁹ MISO TOs claim that this revision allows MISO discretion to determine its cost allocation methodology and in this filing MISO limited its collection of penalty costs to Tariff Customers.²⁰

15. In its comment on MISO's supplemental March 9 filing and its answer, OMS agrees with MISO that the Commission should provide guidance regarding the conflict between the requirements of section 205 of the FPA and the rules relating to penalty violations, specifically 18 C.F.R. § 39.7(b)(4) (2010).²¹ OMS argues that the guidance should allow details of violation reports and investigations to remain non-public but should provide open and sufficient notice of rate filings, including the identity of the filing entity. OMS disagrees with MISO's claim that MISO provided adequate notice. Instead, OMS argues that it took considerable research to figure out that the filing was made by MISO. Finally, OMS states that MISO's March 9 filing should not be given any precedential value in terms of the methodology for future penalty filings.²²

¹⁶ *Id.* at 8-9.

¹⁷ *Id.* at 10.

¹⁸ *Id.* at 3-4.

¹⁹ MISO TOs Answer at n. 9, citing to section 1.412 of the Tariff and noting that "Member" includes "Transmission Owners."

²⁰ *Id.* at 4.

²¹ OMS Response at 1.

²² *Id.* at 2.

3. Commission Determination

16. At the outset, we note that, in its March 9 filing, MISO filed the non-public version of its January 28 filing as a public filing. Therefore, issues concerning the public version of MISO's January 28 filing are now moot. Thus, because MISO's March 9 filing is the non-redacted version of the January 28 filing, we find that the protests submitted by OMS, Wisconsin Electric, and AMP regarding a lack of sufficient notice provided by MISO to be moot.

17. We grant MISO's request to allocate penalty costs under Schedule 34. The Commission has stated that the existence of Schedule 34 "serves to notify all Tariff Customers and Members of their potential responsibility for the costs of monetary reliability penalties assessed to the Midwest ISO."²³ However, we will provide further guidance regarding the requirements of section 205 of the FPA and the rules relating to the non-public status of certain violations of reliability standards, specifically 18 C.F.R. § 39.7(b)(4) (2010). With respect to the notice requirement for a section 205 filing where MISO proposes to allocate specific costs associated with penalty assessments under Schedule 34 of the MISO Tariff, we clarify that this section 205 filing should identify, at minimum, the filing party, the party, if not the filing party, whose act or failure to act gave rise to the penalty, the penalty amount to be allocated, the rate schedule to be used, the method of cost recovery to be used, and the proposed effective date. We believe that identification of these elements will, in most situations, provide sufficient notice to affected parties while not running afoul of 18 C.F.R. § 39.7(b)(4) (2010).

18. Notwithstanding the above, if a filer believes that this minimal information could jeopardize the security of the Bulk-Power System if publicly disclosed, it should not disclose the information but generally state its position in the public version of its proposal to recover costs. The filer should fully support its confidentiality claim in the non-public version of its proposal to recover penalty costs so that the Commission may make a determination as to whether unmasking the party subject to the penalty would be inconsistent with section 39.7(b)(4).

19. It is the Commission's obligation to review each filing to recover and allocate the costs associated with NERC penalty assessments on a case-by-case basis in accordance with the guidelines set forth in the Guidance Order.²⁴ In the instant filing, we find MISO has provided adequate information regarding its internal compliance program that includes each applicable NERC Reliability Standard to support its proposal. MISO explains that its Board of Directors provides incentive goals that include specific

²³ September 8 Order, 128 FERC ¶ 61,229 at P 37.

²⁴ Guidance Order, 122 FERC ¶ 61,247 at P 27.

incentives and bonuses targeted at encouraging employees to prioritize compliance with the NERC Reliability Standards. MISO also explains that its violations were neither intentional, nor grossly negligent, and did not involve any management personnel. Finally, NERC stated in the NOP that MISO self-reported the violation, was cooperative throughout the compliance enforcement process, and did not try to conceal the violations.²⁵ Based on these facts, we find that it is just and reasonable to allow MISO to recover these NERC penalty costs under Schedule 34 in order to comply with the NOP and pay the NERC penalty. Therefore, we reject OMS' request to reject the filing outright or to set it for hearing.

20. In addition, we reject Wisconsin Electric's request to direct MISO to allocate penalty costs to Members. In its September 8 Order approving Schedule 34, the Commission required MISO to modify section 3 to state that costs could be recovered from Tariff Customers *and/or* Members, rather than Tariff Customers *and* Members as originally proposed.²⁶ The Commission found that "the addition of '/or' to Original Sheet No. 2280W provides flexibility in the cost allocation methodology to be proposed by Midwest ISO in a section 205 filing, as each situation may warrant a different cost allocation result."²⁷ We find that in the present situation, where the rate impact of NERC penalty costs will be *de minimis*, flexibility is particularly appropriate.

21. Further, while MISO has filed under Schedule 34, MISO proposes to use the billing determinants of Schedule 10 to calculate the penalty cost allocation to Tariff Customers.²⁸ However, using the billing determinants of Schedule 10, MISO would allocate costs only to Tariff Customers taking Network and Point-to-Point Transmission Service, not *all* Tariff Customers, as defined in the Tariff. We find good cause to waive the Tariff to permit recovery only from Tariff Customers taking Network and Point-to-Point Transmission Service. In this regard, we note that the alternative of instead using other Schedules to allocate the penalty costs would be inefficient, given that the costs of implementing such cost recovery, with sufficient precision to avoid double-billing, could easily exceed the small amounts for which recovery is sought.

²⁵ NERC Notice of Penalty, Docket No. NP11-59-000 at 3.

²⁶ September 8 Order, 128 FERC ¶ 61,229 at P 41.

²⁷ *Id.*

²⁸ The Tariff defines "Tariff Customer" as "A Market Participant, Transmission Customer or Coordination Customer," and "Coordination Customer" includes "Reliability Coordination Customer, and Congestion Management Customer." See sections 1.652 and 1.98 of the Tariff, respectively.

Docket No. ER11-2798-000

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22. We will grant waiver of the 60-day prior notice requirement for good cause shown and accept MISO's proposal to allocate NERC penalty costs under Schedule 34 effective as of the date of this order. We agree with MISO that good cause exists because granting waiver will enable it to collect the allocated NERC penalty costs, which total only \$7,000, within the next billing cycle allowing MISO to pay its NERC penalty promptly.

The Commission orders:

MISO's proposed allocation of NERC penalty costs is hereby accepted for filing, effective as of the date of this order.

By the Commission.

(S E A L)

Kimberly D. Bose,
Secretary.

Document Content(s)

ER11-2798-000.DOC.....1

Exhibit 121

To Declaration of Michael Mabee

Civil Action No. 19-3448 (FYP)

Description:

FERC Order 139 FERC ¶ 61,038 & Page 1 of MISO Petition.

Showing that Midwest Independent Transmission System Operator, Inc. (MISO) Identified themselves in a public docket as the “Unidentified registered Entity” subject to NP12-9-000.

The FERC order contains a Typo on the docket number, but clearly FERC intended to FERC identify Midwest Independent Transmission System Operator, Inc. (MISO) as the “Unidentified registered Entity” cited in NP12-9-000. (The name was denied to me in Exhibit 112.)



Christina Bigelow
Compliance Counsel
Direct Dial: 317-249-5132
E-mail: cbigelow@misoenergy.org

February 16, 2012

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

**Re: Midwest Independent Transmission System Operator, Inc.
Request for Recovery of Charges in Accordance with Schedule 34 (Allocation
of Costs Associated with Penalty Assessments) of its Open Access
Transmission, Energy and Operating Reserve Markets Tariff and Expedited
Treatment
FERC Docket No. ER12-_-000**

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act ("FPA"), 16 U.S.C. § 824d, Part 35 of the Federal Energy Regulatory Commission's ("FERC" or "Commission") regulations, 18 C.F.R. § 35, *et seq.*, and Schedule 34 - Allocation of Costs Associated with Penalty Assessments ("Schedule 34") to the Midwest Independent Transmission System Operator, Inc. ("MISO" or "the Company") Open Access Transmission, Energy and Operating Reserve Markets Tariff ("Tariff"), MISO respectfully requests the Commission's approval to recover \$60,000 associated with a Settlement Agreement and Notice of Penalty ("NOP") filed by the North American Electric Reliability Corporation ("NERC") on December 30, 2011 in Docket No. NP12-9-000. Additionally, to enable MISO to remit payment to the ReliabilityFirst Corporation ("ReliabilityFirst") in a timely manner, MISO also respectfully requests that the Commission provide expedited treatment of its requests herein as described in Section V below.

Midwest Independent
Transmission System Operator, Inc.

Mailing Address:
P. O. Box 4202
Carmel, IN 46082-4202

Overnight Deliveries:
720 City Center Drive
Carmel, IN 46032

www.midwestiso.org
317-249-5400

139 FERC ¶ 61,038
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Jon Wellinghoff, Chairman;
Philip D. Moeller, John R. Norris,
and Cheryl A. LaFleur.

Midwest Independent Transmission System Operator, Inc. Docket No. ER12-1112-000

ORDER ON RECOVERY OF PENALTY ASSESSMENTS

(Issued April 16, 2012)

1. On February 16, 2012, Midwest Independent Transmission System Operator, Inc. (MISO) requested, pursuant to section 205 of the Federal Power Act (FPA),¹ Part 35 of the Commission's regulations,² and Schedule 34 (Allocation of Costs Associated with Reliability Penalty Assessments) to its Open Access Transmission, Energy and Operating Reserve Markets Tariff (Tariff), Commission approval to recover \$60,000 in penalty costs from Tariff Customers. These penalty costs result from a settlement agreement (Settlement Agreement) entered into by and between MISO and ReliabilityFirst that resolved all outstanding issues arising from a non-public investigation by the North American Electric Reliability Corporation (NERC).³ MISO proposes to allocate the costs assessed under the Settlement Agreement on a *pro rata* basis to all Tariff Customers during the calendar month immediately following the month in which this filing is accepted or approved by the Commission.

2. For the reasons discussed below, we accept MISO's proposal, as modified in its Answer, to recover the penalty costs assessed in the Settlement Agreement from Tariff Customers. We also deny MISO's request for waiver of the Commission's 60-day prior notice requirement and establish an effective date of April 17, 2012.

¹ 16 U.S.C. § 824d (2006).

² 18 C.F.R. Part 35 (2011).

³ NERC filed with the Commission, the Abbreviated Notice of Penalty on December 22, 2010 in Docket No. NP11-59-000.

I. Background

3. The Commission issued an order providing guidance concerning cost recovery for penalties that may be assessed against Regional Transmission Organizations (RTOs) and Independent System Operators (ISOs) for non-compliance with NERC's Reliability Standards.⁴ MISO submitted a FPA section 205 filing to the Commission proposing to add Schedule 34 to its Tariff. The Commission conditionally accepted MISO's Schedule 34, subject to a compliance filing. The Commission found that MISO complied with the Guidance Order and it provided a reasonable mechanism to recover NERC Reliability Standard violation monetary penalties assessed against MISO.⁵ Under Schedule 34, MISO may seek to directly assign penalty costs to Tariff Customers or Members if, as the result of the Compliance Monitoring and Enforcement Process, NERC or a Regional Entity finds that such Tariff Customers or Members directly contributed to or were a root cause(s) of a confirmed violation. Where penalties cannot be directly assigned to a particular, identifiable Tariff Customer or Member or are the fault of MISO itself, MISO may seek Commission approval to recover penalty costs from Tariff Customers and/or Members pursuant to a Commission-approved allocation methodology.⁶

II. MISO's Filing

4. MISO seeks Commission approval to recover \$60,000 in penalty costs assessed under a Settlement Agreement using the proposed method for allocating the penalty costs. The \$60,000 in penalty costs at issue resulted from a Settlement Agreement resolving all outstanding issues arising from alleged violations of NERC Reliability

⁴ See *Reliability Standard Compliance and Enforcement in Regions with Regional Transmission Organizations or Independent System Operators*, 122 FERC ¶ 61,247 (2008) (Guidance Order).

⁵ See *Midwest Independent Transmission System Operator, Inc.*, 128 FERC ¶ 61,229 (2009) (September 8 Order).

⁶ See February 16, 2012 Filing at 3.

Standards CIP-004-1, Requirement 4;⁷ BAL-005-1b, Requirement 9;⁸ BAL-006-1.1, Requirement 4;⁹ INT-003-2, Requirement 1;¹⁰ and INT-006-2, Requirement 1.¹¹

5. MISO proposes to allocate the penalty costs on a *pro rata* basis to Tariff Customers based upon the billing determinants under Schedule 10 (ISO Cost Recovery Adder) of the Tariff for the calendar month immediately following the month in which its filing is approved by the Commission. Each Tariff Customer's share of the penalty will be calculated by dividing its total Network Load for the month or its total Reserved Capacity for Point-to-Point Transmission Service for the month (whichever is applicable) by the sum of the total Network Load for all Network Integration Transmission Service for the month and total Reserved Capacity for all Point-to-Point Transmission Service for that month, as those terms are defined in the Tariff. MISO anticipates that the requested allocation will result in a charge of less than one one-thousandth of one cent per megawatt hour.¹²

6. Specifically, MISO states that the impact from the billing of a \$60,000 penalty to its largest Tariff Customer for that month is anticipated to not exceed \$4,758.15, which represents an additional charge of 0.49 percent of all amounts owed under Schedule 10.

⁷ Requirement 4 of CIP-004-1 requires a MISO to maintain a list of personnel with access to Critical Cyber Assets; Requirement 4.1 requires the quarterly review of this list. *See* February 16, 2012 Filing at 2, n.1.

⁸ Requirement 9 of BAL-005-1b requires a Balancing Authority to include all Interchange Schedules with Adjacent Balancing Authorities in its calculation of Net Scheduled Interchange. *See* February 16, 2012 Filing at 2, n.2.

⁹ Requirement 4 of BAL-006-1.1 requires Adjacent Balancing Authorities to operate to a common Net Interchange Schedule and Actual Net Interchange value and to record these hourly values. *Id.* at 2, n.3.

¹⁰ Requirement 1 of INT-003-2 requires a Receiving Balancing Authority to confirm Interchange Schedules with the Sending Balancing Authority before implementing these schedules in its ACE equation. *Id.* at 2, n.4.

¹¹ Requirement 1 of INT-006-2 requires a Balancing Authority and Transmission Service Provider to respond to requests to transition an Arranged Interchange to a Confirmed Interchange within specified time periods. *Id.* at 2, n.5.

¹² February 16, 2012 Filing at 5.

MISO anticipates an additional charge of \$0.05 to its smallest Tariff Customers for that month which represents 0.50 percent of all amounts owed under Tariff, Schedule 10.¹³

III. Notice, Interventions, and Responsive Pleadings

7. On, February 28, 2012 notice of the filing was published in the *Federal Register*, 77 Fed. Reg. 11,526 (2012), with interventions or protests due on or before March 8, 2012. Timely motions to intervene were filed by Detroit Edison Company, American Municipal Power, Inc., Consumers Energy Company, and Wisconsin Electric Power Company. A timely motion to intervene with comments was filed by the MISO Transmission Owners.¹⁴ Duke Energy Corporation (Duke Energy) on behalf of three of its franchised utility affiliates,¹⁵ as well as Duke Energy Business Services, LLC and Duke Energy Commercial Asset Management, Inc. filed a motion to intervene out-of-time.

8. MISO filed an answer to the MISO Transmission Owners' Comments.

¹³ *Id.* at 2.

¹⁴ The MISO Transmission Owners for this filing consist of: Ameren Services Company, as agent for Union Electric Company d/b/a Ameren Missouri, Ameren Illinois Company d/b/a Ameren Illinois and Ameren Transmission Company of Illinois; American Transmission Company LLC; Big Rivers Electric Corporation; Central Minnesota Municipal Power Agency; City Water, Light & Power (Springfield, IL); Dairyland Power Cooperative; Duke Energy Corporation for Duke Energy Indiana, Inc.; Great River Energy; Hoosier Energy Rural Electric Cooperative, Inc.; Indiana Municipal Power Agency; Indianapolis Power & Light Company; International Transmission Company d/b/a ITCTransmission; ITC Midwest LLC; Michigan Electric Transmission Company, LLC; Michigan Public Power Agency; MidAmerican Energy Company; Minnesota Power (and its subsidiary Superior Water, L&P); Missouri River Energy Services; Montana-Dakota Utilities Co.; Northern Indiana Public Service Company; Northern States Power Company, a Minnesota corporation, and Northern States Power Company, a Wisconsin corporation, subsidiaries of Xcel Energy Inc.; Northwestern Wisconsin Electric Company; Otter Tail Power Company; Southern Illinois Power Cooperative; Southern Indiana Gas & Electric Company (d/b/a Vectren Energy Delivery of Indiana); Southern Minnesota Municipal Power Agency; Wabash Valley Power Association, Inc.; and Wolverine Power Supply Cooperative, Inc.

¹⁵ Duke Energy Ohio, Inc., Duke Energy Kentucky, Inc., and Duke Energy Indiana, Inc.

IV. Discussion

A. Procedural Matters

9. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2011), the timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding.

10. Pursuant to Rule 214(d) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214(d) (2011), the Commission will grant Duke Energy's late-filed motion to intervene given its interest in the proceeding, the early stage of the proceeding, and the absence of undue prejudice or delay.

11. Rule 213(a)(2) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2) (2010), prohibits an answer to a protest or answer unless otherwise ordered by the decisional authority. We will accept MISO's answer because it provided information that assisted us in our decision-making process.

B. Substantive Matters

1. Comments and Protests

12. MISO Transmission Owners generally support MISO's proposed recovery of the Settlement Agreement Costs. However, they assert that the Commission should direct MISO to revise its proposed recovery mechanism and allocate the penalty costs to all Tariff Customers.¹⁶ They note that the proposed allocation method recovers the penalty costs only from MISO's Transmission Customers. MISO Transmission Owners point out that Schedule 10 billing determinants (on which the proposed allocation method is based) are determined by using MWhs of Point-To-Point and Network Integration Transmission Service. They state that Schedule 34 does not allow MISO to recover the costs solely from Transmission Customers when a monetary penalty has been assessed as a result of MISO's conduct. They argue that MISO cannot ignore the clear language of its Tariff and assert that: "To be consistent with Schedule 34 and its stated intention of 'billing and invoicing of MISO Tariff Customers,' [fn omitted] MISO should be required to allocate a portion of the Settlement Agreement Costs to Coordination Customers."¹⁷

2. Answer

13. In its answer, MISO states that it developed an allocation methodology that attempted to balance a broad allocation with the need for administrative efficiency.

¹⁶ MISO Transmission Owners Comments at 4.

¹⁷ *Id.* at 5.

MISO goes on to say that Schedule 10 billing determinants are relatively straightforward to calculate, and that allows MISO to calculate penalty allocations with minimal additional administrative costs. With regard to MISO Transmission Owners' comments, MISO states that cost allocation decisions require a balancing of competing interests, including not only cost allocation considerations, but also administrative feasibility and efficiencies. However, MISO states that it has developed an alternative cost allocation methodology to address MISO Transmission Owners' comments. MISO states that the alternative cost allocation methodology will reach approximately 95 percent of its Tariff customers while still "balancing of competing interests, including not only cost allocation considerations, but also administrative feasibility and efficiencies"¹⁸ In order to achieve this, MISO proposes in its answer to utilize billing determinants under Schedule 17 (Energy Market Support Administrative Service Cost Recovery Adder) of the Tariff. Under this alternate cost allocation methodology, Tariff Customers will be assessed the reliability penalty costs in proportion to their Schedule 17 billing determinants for the calendar month immediately following the month in which this filing is accepted or approved by the Commission.

14. MISO states that for the month in which Schedule 17 determinants are used to allocate the reliability penalty costs, MISO will sum, for each Tariff Customer, the applicable billing determinants under Schedule 17 which include: (1) all MWh injected into the Transmission System by all Market Participants including deliveries to the Transmission System from generation located both within the Transmission System and outside of the Transmission System; (2) all MWh extracted from the Transmission System by all Market Participants including MWh delivered to loads located both within the Transmission System and outside of the Transmission System (including all out and through transactions using the Transmission System); and (3) all Bids or Offers for Energy that settle in the Day-Ahead Energy and Operating Reserve Markets, but do not actually inject MWh into or extract MWh from the Transmission System in the Real-Time Energy and Operating Reserve Markets, expressed in MWh. MISO will then divide each Tariff Customer's billing determinants by the aggregate billing determinants of all Tariff Customers to arrive at the share of penalty costs to be borne by each Tariff Customer.¹⁹

3. Commission Determination

15. We accept MISO's proposal, as modified in its Answer, to recover penalty costs under Schedule 34 of its Tariff using Schedule 17 billing determinants. The Commission stated that Schedule 34 provides a reasonable mechanism for MISO to seek recovery of the costs of a monetary penalty assessed against MISO for a Reliability Standard

¹⁸ MISO Answer at 3.

¹⁹ *Id.* at 4.

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violation, either on a direct-assignment basis or to be allocated broadly to all Tariff Customers and Members.²⁰ The Commission stated that in its September 8 Order that Schedule 34 “provides flexibility in the cost allocation methodology to be proposed by Midwest ISO in a section 205 filing, as each situation may dictate a different cost allocation result.”²¹ We agree with MISO that using Schedule 17 billing determinants will strike a reasonable balance of competing interests, including not only cost allocation considerations, but also administrative feasibility and efficiencies. Accordingly, we accept MISO’s alternate proposal to allocate penalty costs under Schedule 34 of its Tariff utilizing Schedule 17 billing determinants as proposed in its answer.

16. MISO requests waiver of the Commission’s prior notice requirement. We deny MISO’s request for waiver of the Commission’s prior notice requirement. MISO states that it will allocate the costs assessed under the Settlement Agreement during the calendar month immediately following the month in which this filing is accepted or approved by the Commission. As such, we accept the filing effective April 17, 2012, sixty days after the filing date.

The Commission orders:

MISO’s revised proposed allocation of NERC penalty costs is hereby accepted, effective April 17, 2012, as discussed in the body of this order.

By the Commission.

(S E A L)

Kimberly D. Bose,
Secretary.

²⁰ See September 8 Order, 128 FERC ¶ 61,229 at P 35.

²¹ *Id.* at P 41.

Document Content(s)

ER12-1112-000 [1] .DOCX.....1

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL MABEE,

Plaintiff,

V.

Civil Action No. 19-3448 (FYP)

FEDERAL ENERGY REGULATORY
COMMISSION,

Defendant.

DECLARATION OF GEORGE R. COTTER

I, George R. Cotter, being sworn on oath, do declare that the following statements are true and correct to the best of my knowledge and belief:

1. I have been asked by the Plaintiff in this action, Michael Mabee, to submit this Declaration. If I were to testify at a deposition or at a trial, I would testify to the facts I am including in this Declaration.

2. In preparation for submitting this Declaration, I reviewed the following documents that were Exhibits attached to the Declaration of Michael Mabee, dated June 4, 2022 . These Exhibits included:

- Exhibit 113 – NP10-160-000 NOP, FERC No Further Review Letter & FOIA denial letter.

- Exhibit 114 – NP10-135-000 NOP, FERC No Further Review Letter & FOIA denial letter.
- Exhibit 115 – NP18-7-000 NOP, FERC No Further Review Letter & FOIA denial letter.
- Exhibit 116 – NP18-14-000 NOP, FERC No Further Review Letter & FOIA denial letter.

BACKGROUND

3. I am a retired cryptologist from the National Security Agency (NSA), having spent over 60 years in cryptology, both defense and offense. I have held many senior technical and management positions in support of both agency missions, Signals Intelligence and Cybersecurity.

4. I was the founding Director for the Department of Defense (DoD) Computer Security Center created in the early 1980's. I have managed the Agency's major communications and networks facilities and, subsequent to my retirement in 2008, served on the NSA Advisory Board (NSAAB) until 2018. During my service on the NSAAB, and continuing, I focused my research on the nation's electric system, commonly called the "GRID." I authored many White Papers on Security in the North American Grid, distributed to about 40 very senior Administration, Congressional and Regulatory organizations.

5. In summary, I have spent my entire adult life in the defense of my country against foreign adversaries who were attempting to do its national security systems grave harm, including defense of critical infrastructures, such as the National Grid. I believe I am very well qualified to comment on the merits of Mr. Mabee's lawsuit, in particular the singular FERC effort to deny identification of violators of Reliability Standards to the public. FERC's tireless

pursuit of FOIA access exclusion ranges from inappropriate claims that utility names are considered “Critical Energy/Electric Infrastructure Information (CEII),” to abuses of FOIA exemptions 3 and 7(F), to legislative influence meant to convince lawmakers to codify their dystopian practice of “Security through Obscurity.” These FERC efforts to hide entity names does nothing to protect the grid.

FERC, NERC, INDUSTRY CYBERSECURITY DECEIT AND DECEPTION

6. The Federal Energy Regulatory Commission (FERC) assertions are patently false that its regulatory policy of total denial of identifications of utilities, known as unidentified registered entities (UREs), who are subject to compliance review, is for national security protections. FERC and North American Electric Reliability Corporation (NERC) created cybersecurity standards in 2008 in response to the The Energy Policy Act of 2005 (EPAAct) [PUBLIC LAW 109–58—AUG. 8, 2005] which amended the Federal Power Act (FPAAct) by adding “Section 215 Electric Reliability.” This Section 215 of the FPAAct required FERC, NERC and Regional Entities (RE’s) to protect Grid Operations and in particular, operational real time power flows for Bulk Power System (BPS) generation and transmission systems. However, the Critical Infrastructure Protection (CIP) standards they created deliberately avoid any linkage to existing operational technologies (OT) governing BPS systems, thus maintaining exclusive control of standards by the RE’s.

7. This gap in mandatory cybersecurity coverage presents grave hazards to national security systems and other critical national infrastructures and has been documented by me in five Motions to Intervene (MOI’s) in FERC compliance reviews. FERC now attempts to prevent

the use of FOIA to expose its coverup of the agency's consistent and wilful failure to implement Section 215 of the FPAAct since 2005.

8. Nothing, absolutely nothing in my six decades experience with the nation's adversaries justifies FERC's abuse of the CEII designations. FERC's responses to Mr. Mabee's FOIA requests are just the agency's latest attempts at avoiding transparency, this time trying to use FOIA exemptions 3 and 7(F) and "CEII" as justifications to hide from public scrutiny not only the identities of regulatory violators but also FERC's failure to implement effective cybersecurity controls as required by law.

9. Unfortunately, Mr. Mabee is forced by these circumstances to limit his lawsuit to only the identification of offending utilities, in his singular efforts to keep FOIA alive for this major industry malfeasance. This amicus brief, a critique of the industry campaign, is intended to support his efforts.

10. The following detailed analyses are applied to the four Exhibits which I have reviewed.

Analysis of Exhibit 113 NP10-160-000 URE

11. Critical Infrastructure Protection Standards were approved by FERC in Order No. 706, January 18, 2008. Violations in NP10-160-000 (Mabee Decl. Exhibit 113) are identified as CIP 003-1 and CIP 007-1 and date from July 1, 2008. Violation CIP 003-1 -- "URE's Cyber Security Policy did not address all the requirements in Standards CIP-002 through CIP-009". Violation 007-1 -- "URE did not have test procedures for two Critical Cyber Assets, URE's Energy Control Center and Backup Energy Control Center. URE's test methodology did not outline baseline production and development parameters and URE could not demonstrate that its

testing procedure minimized adverse effects on URE's production system or its operations. URE did not document that it conducted its testing in a manner that reflected URE's production environment and URE did not document all test results.”

12. Nothing in this compliance report presents risks justifying CEII protection of the URE’s identity at this late date.

13. Furthermore, Order 672 which is directive to Order 706 states the following: “**321. *The proposed Reliability Standard must address a reliability concern that falls within the requirements of section 215 of the FPA. That is, it must provide for the reliable operation of Bulk-Power System facilities. It may not extend beyond reliable operation of such facilities or apply to other facilities. Such facilities include all those necessary for operating an interconnected electric energy transmission network, or any portion of that network, including control systems. The proposed Reliability Standard may apply to any design of planned additions or modifications of such facilities that is necessary to provide for reliable operation. It may also apply to Cybersecurity Protection.***” (Emphasis added)

14. Thus, the chain of connectivity across Orders Nos. 672 and 706 directly requires CIP 003-1 and CIP 007-1 standards to effectuate **operations** of the Bulk Power Systems but this fundamental principle has been studiously avoided by NERC and FERC. This is a contradiction in Reliability Standards. Therefore a reasonable person would ask if FERC’s decision to keep the identity of the URE from the public has to do with keeping this contradiction from public examination.

15. In summary, based on my experience and my thorough analysis of Exhibit 113 [NP10-160-000 URE], I find that the name of the URE is not CEII and that publicly disclosing it

the would not negatively affect national security, economic security, public health or safety, or put any individual at risk of harm.

Analysis of Exhibit 114 NP18-135-000 URE

16. In NP18-135-000 (Mabee Decl. Exhibit 114), the URE evidently violated CIP-005-1 in miswiring circuits into or out of the utility Security Perimeter. “The Registered Entity’s unrestricted firewall access on the first connection to the Electronic Security Perimeter did not follow an access control model that denied access by default. The Registered Entity’s direct outside connection on the second connection was a failure to only enable ports within the Electronic Security Perimeter.”

17. As stated in the Compliance report, “The Registered Entity mitigated this violation by correcting: (i) the rule set on the firewall for the two outbound circuits at issue; and (ii) the cabling error that connected the Critical Cyber Asset servers to an outbound node. Actions taken included reconnecting these two circuits through a proper Electronic Security Perimeter border firewall and configuring the necessary firewall rule sets to appropriately restrict access.”

18. The violations were successfully mitigated over 12 years ago. These were a physical change and a correction to firewall rules. To all appearances, these were fairly routine actions with an appropriate low financial penalty to match. There is therefore, no stated reason for the identity of the utility to be suppressed 12 years later. Although the violation may have affected CIP-002 through CIP-009 as cited in a footnote, the corrective action wouldn’t affect the application of CIP Standards over a span of 12 years. In the view of this cryptologist, security cannot be an issue; therefore, it would have to be something else. If there is an enduring problem

with this type of violation, FERC cannot suppress that. If the problem is not current, there is no danger to the utility or its personnel whatsoever.

19. It must be noted that the entire concept of “Security Perimeters” ensures major vulnerabilities in security across the entire Grid. NERC and the RE’s created this concept to avoid direct conflict of CIP Standards with non-CIP Reliability Standards in the communications (COM) category. The COM category shows up regularly in Compliance Audits of non-CIP Reliability Standards, perhaps the most critical engineering standard in the Grid as a whole. Hence, we have CIP-002 exclusion of communications and networks on the specious grounds that the industry does not “own” communications systems. An astute observer would ask how non-CIP Reliability Standards can be so dependent on the “COM” standard linking all these RE’s together for controlling Real-time Power Flows, a direct conflict between the two sets of standards. One might also wonder if FERC’s decision to keep the identity of the URE from the public has to do with keeping this direct conflict in the standards from public examination since careful examination reveals the conspiracy to isolate the RE’s from cybersecurity interference in their control of “Operations” and “Real-time Power Flows”.

20. In summary, based on my experience and my thorough analysis of Exhibit 114 [NP18-135-000 URE], I find that the name of the URE is not CEII and that publicly disclosing it would not negatively affect national security, economic security, public health or safety, or put any individual at risk of harm.

Analysis of Exhibit 115 NP-18-7-000 URE (PG&E)

21. There is no more obvious an example of misuse of CEII than that of attempting to hide the Pacific Gas & Electric Co as the violator of this massive compromise. This utility’s

violation of CIP Standards has been thoroughly revealed to the public through the media. The compromise was total. The only justification for FERC, NERC and the WECC to coverup the culpability of this major West Coast utility is the likelihood that its CIP violations could be used in pending liability lawsuits against PG&E, several of which involved fatalities. The violations clearly document the utility's failure to protect its widespread configuration database and all the security features intended to secure it. While the WECC significantly underplayed, with minimizing regularity, its capture of PG&E's transgressions, the scope is clearly significant, i.e., duration of violation 590 days, usernames, passwords, cryptographic details, internet exposure. The "Analysis of logs..." statement in FERC's brief hugely minimizes the opportunities and capabilities of the nation's adversaries to take advantage of this compromise in its malware planning and development without being detected. Why? Because this filing was contested by several large not-for-profit organizations with exposure to hundreds of thousands membership.

22. There is nothing useful to an attacker that was missing from the public record as should be clear to any objective reviewer, including this veteran cryptologist. In the mid-decade timeframe for PG&E's 590-day violations, the utility was constantly in trouble with the California PUC, wildfires due to poor vegetation management, maintenance difficulties on pipelines, with lawsuits on corporate culpability, and human fatalities. PG&E's failure to maintain minimal control over vital configuration data is the singular reason for FERC's coverup of its identification in the sanitization of NP18-7-000, an incredible NERC and FERC effort to minimize liability risks to this major utility.

23. In summary, based on my experience and my thorough analysis of Exhibit 115 [NP-18-7-000 URE (PG&E)], I conclude that if the identification of PG&E continues to be suppressed, this case can serve as the poster child for the death of FOIA in the energy industry.

Analysis of Exhibit 116 NP18-14-000 URE

24. FERC issued its “No Further Review Letter in NP18-14-000 on June 29, 2018, (Mabee Decl. 116). This URE is obviously a major utility having Transmission, Distribution and Control Center responsibilities, “obviously” because of the violations cited and the vulnerabilities reported. Its assessed penalty of \$180,000 is suspiciously low given the description of the compliance failures reported. There are six violations rated moderate and only one labeled serious. Close analysis suggests strongly that several of these violations were closely related which is a significant risk and should be separately assessed. For example, the CIP 014 violation appears to be related by duration and other details to the CIP 006 violation rated “serious.” Regrettably this is not the only issue with this Compliance assessment which has clearly been undervalued. FERC has gone to extraordinary lengths to avoid the conflict between the two separate Reliability Standards which are extremely difficult to keep separate due to the fundamental nature of the violations, heavily bearing on the communications and networks involved, including control center functions, with linkages to substations and, in fact, subcontractors. It is indeed likely that if the identification of the utility were available, other legal and security authorities would be involved. Even so, if these issues were mitigated within a year of the NOP, there would be no reason why disclosing this entity name would run afoul of FOIA Exemptions 3 or 7(F).

25. For example, the CIP 006 violation states: “URE did not properly mitigate the risks of the maintenance work on the station” *duration 6 days*, the CIP 014 violation states: the major contributing cause was a change to the baseline list of substations used during the evaluation process occurred (to add the substation) and was not communicated to those conducting the assessment. The violation involved the management practice of verification because URE failed

to verify that each qualifying substation would be reviewed in compliance with CIP-014”,
duration 5 days.

26. FERC was forced to refer to two non-CIP Reliability Standards, TPL 001-4 R6 and EOP 004-2 (sic., but it is clearly EOP 004-4 R2) to minimize its “moderate” rating and avoid linkage to other violations. Unfortunately for FERC, the EOP standards immediately follows the COM category, and out jumps COM-001 which states, clearly applicable to this compliance filing, ***“Complete loss of Interpersonal Communication and Alternative Interpersonal Communication capability at a BES control center”***. But NERC has built an exception into CIP 002-5 standards to “exempt” Communications and Networks, hence the reference to the “other” set of non-CIP Reliability Standards to justify the delinquency mark of “moderate”.

27. But this lawsuit seeks only the identification of the URE. However, the justification for this cryptologists filing, which must be carefully evaluated, is to demonstrate that the industry, FERC and NERC have carefully circumscribed Grid “Operations” and “Real-time Power Flows” to avoid potential conflicts from CIP Standards. Their procedures are designed to negate “FOIA” requests during current timeframes, a successful but extremely dangerous affront to National Security interests.

28. In summary, based on my experience and my thorough analysis of Exhibit 116 [NP18-14-000 URE], I conclude that FERC’s policies of hiding the URE identity from public scrutiny and then denying FOIA requests on grounds of CEII and exemptions 3 and 7(f) are more dangerous to our national security than allowing the public to know the name of the violator.

Negative Downstream Effects of FERC Deception

29. My analysis of Exhibits 113 through 116 presented above should make it clear that FERC's use of CEII or of Exemption 7(F) endangerment rationale to effectively block all public access to URE identifications and compliance violation details simply is unjustified, nay absurd, in the real world of Russian Federation or other cyber attacks.

30. Because Russian Federation cyber attacks are concealed from scrutiny in the US grid, there are notable downstream effects in other critical infrastructures. For example, Russian Federation capabilities developed in the process of penetrating the grid were used extensively in the 2016 US Presidential election, and in Federation attacks on energy supplies (the 2020 eastern U.S. pipeline pseudo-ransomware shutdown). Russian MOD/GRU malware (including INDUSTROYER) tested in the Ukraine Grid in 2015 and 2016, was probably employed in the July 2019 blackout of the NYC Manhattan West End. I postulated this to have been Russian payback for Cyber Command's blocking of Federation interference in the 2018 midterm elections. ConEd seems to have conspired with NERC in a coverup report on this event to the NY Public Utility Commission (PUC). Understand, there is a mountain of forensic evidence tying these negative downstream effects back to the FERC/NERC "Security through Obscurity" policies on hiding Russian penetrations of the U.S. national electric system.

FERC's POLICIES CREATE REAL ISSUES IN UTILITY LIABILITIES

31. It should not go unnoticed that the obscuring of utility identifications involved in compliance failures creates not just a huge risk in national security but also a heavy burden in holding utilities liable for dangers to their clients. Normally you would consider such identifications to be a FERC obligation. NERC serves as the "Electric Reliability Organization" (ERO) and is thus certified by FERC to establish and enforce Reliability Standards for the Bulk

Power System. As the ERO, NERC has certainly compromised its role in arbitrarily using CEII to hide a utility's liability in a compliance review, if not avoiding the review entirely, and FERC is wholly complicit in rubber-stamping the NERC violation reports labeled URE. The PG&E compromise is a real-world example involving 80 victims of recent California wildfires that should not be denied access by litigants.

32. Another crystal clear example of FERC permitting liability and litigation avoidance by regulators can be found in a compliance audit by the New York Independent System Operator (NYISO) - a not-for-profit corporation authorized by FERC in 1998 and responsible for operating the state's bulk electric grid. The NYISO compliance audit [NCR07133] of Long Island Power Authority (LIPA) was conducted on November 28/29 2017, report dated 12/8/2017, under the auspices of NERC's NPCC, a Regional Entity (RE). This audit was ostensibly for compliance with the major engineering Reliability Standards, which do not address cybersecurity requirements, but extensively address all operational functions, including real-time power flows. However, the auditors were careful to not only avoid inadvertent linkages to the CIP Standards, but to put all "Operations" and "Real-time Power Flow" operations off-limits in the audit. I am not able to determine, absent the FOIA material requested and not delivered to Mr. Mabee, whether this New York compliance matter is one of the entity names withheld from Mr. Mabee.

33. FERC permits liability limiting and ineffective audits. FERC is using FOIA exemptions 3 and 7(F) to justify hiding the identification of violators of 12-year old audits such as cited in Mr. Mabee's exhibits, claiming that making those identities public would "negatively affect national security, economic security, public health or safety, or put any individual at risk of harm." This is the height of hypocrisy.

FERC IS PLAYING BOTH SIDES OF THE STREET

34. Since Engineering (non-CIP) Reliability Standards show no linkages between (1) systems and technologies that control operational power flows, and (2) Critical Infrastructure Protection (CIP) Standards, FERC (and NERC) must protect its scheme of obscuring all traceable links from the separate compliance systems. This is difficult because with over 1500 “registered entities,” NERC must carefully control the requisite compliance assessments. It does this by maintaining a very limited data base of audits actually conducted, with limited redactions, so that it is accessible to its clientele. If the compliance audit must be reported to FERC, it is apparently treated fully like “CEII.” However, the few audits accessible to this researcher, such as the LIPA case cited above, can and have revealed the major flaws in the scheme.

CONCLUSION

35. This lawsuit essentially asks only for the identification of utilities that fail compliance assessments on standards critical to the operation and security of both the Bulk Power System (BPS) and interconnected Distribution systems, and which have received No Further Review letters from the regulatory agency in charge.

36. Given the in-depth background I have provided, along with the exhaustive context and detailed analysis of the four NOPs I have reviewed, I want to make it clear that in my professional opinion, FERC is completely unjustified in using CEII and FOIA exemptions 3 and 7(F) to deny Mr. Mabee’s FOIA requests. Releasing the names of these regulatory violators will not be a breach of CEII, nor will it pose any threat to any person.

Pursuant to 28 U.S.C. § 1746, I hereby affirm under penalty of perjury that the foregoing declaration is true and correct.

Executed this 8th day of June, 2022 at Edgewater, Maryland

/s/ George R. Cotter

George R. Cotter

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL MABEE,

Plaintiff,

V.

FEDERAL ENERGY REGULATORY
COMMISSION,

Defendant.

Civil Action No. 19-3448 (FYP)

DECLARATION OF TYSON SLOCUM

1. I am Tyson Slocum, and I direct the Energy Program at Public Citizen, Inc. Established in 1971, Public Citizen is a national, not-for-profit, non-partisan, research and advocacy organization representing the interests of household consumers. Public Citizen is active before the Federal Energy Regulatory Commission (FERC) promoting just and reasonable rates, and supporting efforts for utilities to be accountable to the public interest.

2. Among my varied duties as Director, I cover the regulation of petroleum, natural gas and power markets, where I am a very active intervenor and participant in proceedings before the Federal Energy Regulatory Commission. I have served in this capacity at Public Citizen for twenty-two years.

3. I am also a voting member of the U.S. Commodity Futures Trading Commission (CFTC)'s Energy & Environmental Markets Advisory Committee, and the CFTC's Market Risk Advisory Committee. I regularly intervene before the U.S. Department of Energy raising issues of interest to consumers in authorizations to export liquified natural gas (LNG). I have often

appeared before Congress presenting my research and opinions on a wide array of energy market matters, and frequently am featured in the media discussing these issues, including appearances on CNN, MSNBC, the New York Times and The Colbert Report. I am also a member of the faculty at the University of Maryland Honors College, where I teach a course I designed on energy and climate policy, and was named Teacher Of The Year in 2017.

4. Since one of my organization's top policy priorities is ensuring that public utilities are accountable to the public interest, I have been active in FERC proceedings urging the Commission to make public the identities of utilities that commit cybersecurity violations that result in a notice of penalty. On this issue, we believe that publicly identifying the names of utilities subject to a notice of penalty is necessary for the public interest. We do not seek public release of the detailed cybersecurity violations, or any other information that may compromise security—we only want the names of utilities made public.

5. It is clear that the name of a utility subject to a notice of penalty cannot qualify as protected Critical Energy Infrastructure Information. Throughout the economy, customers routinely have access to the names of companies that experience major cybersecurity breaches. Utilities are unique in that the Federal Power Act states “that the business of transmitting and selling electric energy for ultimate distribution to the public is affected with a public interest” [16 USC § 824(a)].

6. Releasing just the name of a utility subject to a notice of penalty cannot be expected to result in the endangerment of the life or physical safety of any individual. Releasing just the name of the utility will not compromise the utility's operations, or recklessly expose any sensitive information. In fact, publicly identifying the names of utilities subject to notice of

penalty violations can help improve and strengthen cybersecurity standards – thereby helping consumers and keeping our electricity system more secure.

7. Many utilities are authorized for full cost recovery at both the federal and state jurisdictional levels, and concealing the identity of a utility subject to a financial penalty can materially effect the rate recovery process. For example, concealing the name of violators could allow the utility to unreasonably seek rate recovery for not just the penalty amount, but any investments the utility is required to make under the terms of the notice of penalty. Absent the public knowledge of the violation, state utility commissions and public interest intervenors (such as Public Citizen) would be unable to assess whether such costs are properly recovered from ratepayers or should be borne by shareholders. This outcome would defeat the entire purpose of the penalty by forcing ratepayers to absorb the costs of utility imprudence. Furthermore, to the extent that a utility committing violations subject to a notice of penalty submits any cybersecurity-related rate recovery requests to regulators, knowing a utility's track record on such issues may materially affect regulators' assessment of such requests.

8. It is broadly in the public interest to require the public disclosure of a utility that is subject to a financial penalty for violations of federal reliability and cybersecurity rules. Concealing the names of utility violators sends a confusing message to the public that financial penalties do not come with full accountability, as future violators may be able to similarly hide behind of the veil of anonymity.

9. Directing the public release of the names of utility violators will not jeopardize cybersecurity, the security of the Bulk-Power System, or national security. Identifying the name of the utility subject to a notice of penalty will not identify any current or recurring vulnerabilities. Public release of the utility's name could improve cybersecurity, as regulators and

stakeholders could use such public information to better educate and prepare utilities' practices. In general, the more information that regulators and the public have about violators, the better able we all are to learn from past mistakes and reduce the likelihood of future ones. Keeping state regulators and the public in the dark about the cybersecurity track record of our electric utilities may actually create a false sense of security, and reduce the likelihood of more public awareness and vigilance needed to protect cybersecurity.

Pursuant to 28 U.S.C. § 1746, I hereby affirm under penalty of perjury that the foregoing declaration is true and correct.

Executed this 6th day of June, 2022 at City of Washington, District of Columbia.

/s/ Tyson Slocum

Tyson Slocum

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL MABEE,

Plaintiff,

V.

FEDERAL ENERGY REGULATORY COMMISSION,

Defendant.

Civil Action No. 19-3448 (FYP)

DECLARATION OF CHRISTOPHER ROBERT VICKERY

I, Christopher Robert Vickery, being sworn on oath, do declare that the following statements are true and correct to the best of my knowledge and belief:

I am currently employed as Sr. Risk Assessment Specialist at a publicly traded, US based, critical infrastructure company. Prior to this position I spent four years as Director of Cyber Risk Research at a Silicon Valley cybersecurity firm serving customers such as NASA and The New York Stock Exchange. US patent #11,023,610 ("Data breach detection and mitigation") lists my name as a co-inventor.

I am the security researcher referenced by NERC in Notice of Penalty docket no. NP18-7-000 (Exhibit 115). While researching vectors of internet data exposure as a hobby in May 2016, I discovered an unguarded and unprotected collection of data on the internet which had been configured for public accessibility. After downloading, reviewing, and realizing the

potential severity of this data in the wrong hands, I took it upon myself to notify Pacific Gas & Electric of their apparent oversight in hopes of the mistake being corrected.

The situation was not initially taken as a serious event by staff at Pacific Gas & Electric. I was informed by Pacific Gas & Electric that this data was "fake" and a "dummy data set" which could not possibly pose a risk of any harm. Despite these false claims, the database did indeed disappear from public visibility soon after my notification to Pacific Gas & Electric.

I was not fooled by Pacific Gas & Electric's assertions and I proceeded to publish an article which discussed what I had found. At all times I was careful to only publish safely redacted screenshots and discuss generalities of the content which, by that time, was no longer visible through the public internet in the manner I had come across it.

The article I wrote garnered sufficient attention to force a serious review by Pacific Gas & Electric. It came as no surprise to me that the data I had found was in fact not fake, nor was it dummy data. According to the eventual NERC investigation into the matter, this data represented "Critical Cyber Assets (CCAs)" of which exposure "posed a serious or substantial risk to the reliability of the bulk power system (BPS)."

At the request of Pacific Gas & Electric, I uploaded a copy of the data set to a Secure File Transfer Protocol server which was under the control of Pacific Gas & Electric. I then proceeded to wipe and overwrite the hard drive which I had used in downloading the data. These steps were documented in a signed and notarized affidavit which I provided to Pacific Gas & Electric in June of 2016.

Since that time, I have discussed the events of this situation with multiple journalists who wrote follow-up articles. I have reminisced openly about the remarkable and historic situation on

my very-public Twitter account. There is no doubt that Pacific Gas & Electric is the Unidentified Registered Entity (URE) subject to Notice of Penalty NP18-7-000.

Both the original discovery of this data breach and the eventual fine of \$2.7 million were widely covered by news outlets whose investigation efforts further cemented the connection to Pacific Gas & Electric. There is no reasonable possibility of the Unidentified Registered Entity referenced in NP18-7-000 being any company other than Pacific Gas & Electric.

I am uniquely situated to definitively state that it is not reasonable to claim a risk of cybersecurity harm will increase as a result of Pacific Gas & Electric being officially named as the Unidentified Registered Entity relevant to NERC Notice NP18-7-000.

I have reviewed the Plaintiff's December 18, 2018 Freedom of Information Act Request (Exhibit 103), NERC's February 28, 2018 Notice of Penalty in NP18-7-000, FERC's May 30, 2018 "No Further Review" notice and FERC's February 26, 2021 denial of the Plaintiff's FOIA request (Exhibit 115). Based on my review of the facts and my personal knowledge of the underlying events, I can conclude that FERC's release of Pacific Gas & Electric's name in conjunction with Notice of Penalty docket no. NP18-7-000 could not reasonably be expected to endanger the life or physical safety of any individual.

This identifying information is already in the public realm. It has been discussed openly and written about extensively. I have already personally disclosed the name of this Unidentified Registered Entity and at no point has Pacific Gas & Electric denied the claim or sought to compel retractions from me in publication of this basic information.

There is no merit whatsoever to any argument claiming the name "Pacific Gas & Electric" should be withheld from official acknowledgement of association with the events recorded by NP18-7-000 in relation to concerns of cybersecurity risk.

Pursuant to 28 U.S.C. § 1746, I hereby affirm under penalty of perjury that the foregoing declaration is true and correct.

Executed this 7th day of June, 2022

/s/ Christopher Robert Vickery
Christopher Robert Vickery

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL MABEE,

Plaintiff,

V.

Civil Action No. 19-3448 (FYP)

FEDERAL ENERGY REGULATORY
COMMISSION,

Defendant.

DECLARATION OF THOMAS J. WALLER JR.

I, Thomas J. Waller Jr., being sworn on oath, do declare that the following statements are true and correct to the best of my knowledge and belief:

1. I have been asked by the Plaintiff in this action, Michael Mabee, to submit this Declaration. If I were to testify at a deposition or at a trial, I would testify to the facts I am including in this Declaration.

2. In preparation for submitting this Declaration, I reviewed the following documents that were Exhibits attached to the Declaration of Michael Mabee, dated the 30th day of May 2022 . These Exhibits included:

Exhibit 113 – NP10-160-000 NOP, FERC No Further Review Letter & FOIA denial letter

Exhibit 114 – NP10-135-000 NOP, FERC No Further Review Letter & FOIA denial letter

Exhibit 115 – NP18-7-000 NOP, FERC No Further Review Letter & FOIA denial letter

Exhibit 116 – NP18-14-000 NOP, FERC No Further Review Letter & FOIA denial letter

BACKGROUND

3. I currently serve as the Director of Infrastructure Security at the not-for-profit non-partisan Center for Security Policy. My duties include educating policymakers at the federal, state, and local level in all branches of government and working daily with renowned national security experts to help provide those policymakers an unconstrained analysis of the current threat environment along with workable policy solutions to address these threats. In this capacity I have personally briefed policymakers ranging from the President of the United States to the U.S. Secretary of Energy to state public service commissioners to local town mayors. I have provided expert testimony to state legislatures around the country on a wide variety of topics but I am most frequently asked to testify on matters pertaining to infrastructure security – and predominantly issues surrounding the security of the U.S. electric grid. I am the co-director of the nationwide Secure the Grid Coalition which is focused on protecting the U.S. electric grid from all hazards.

4. My formal education includes numerous military schools and colleges, a degree in International Relations from Tulane University and executive education from the Wharton School. I also currently serve in the United States Marine Corps Reserves as a Lieutenant

Colonel, having recently successfully commanded the Marine Corps' only independent elite Force Reconnaissance Company. I maintain a Top-Secret SCI clearance with the U.S. Department of Defense and have been entrusted to command Marines in combat operations and in numerous theaters. I commanded Marines in combat operations in Afghanistan as a 2nd Lieutenant in 2004, then in Al Fallujah Iraq as a 1st Lieutenant in 2005, and again as a Captain in Al Anbar Province Iraq in 2006. I commanded Marines as a Major in sensitive operations in northern Africa in 2012 and in Latin America in 2013. At the rank of both Major and Lieutenant Colonel, I was recruited by the U.S. Air Force Air Education Training Command (AETC) to serve as a special staff member to the U.S. Air Force Electromagnetic Defense Task Force (EDTF) where I was tasked with coordinating numerous conferences and meetings between high-level executives focused on electric infrastructure security. The executives with which I worked ranged personnel at the White House National Security Council (NSC) to the Nuclear Regulatory Commission (NRC), to members of the private sector and academia.

5. I have contributed to numerous federal dockets other activities with agencies such as the Federal Energy Regulatory Commission (FERC) and the Department of Energy (DOE) and have worked closely with staff personnel from both of these organizations on matters pertaining to the defense of the U.S. electric grid.

6. I believe I am well qualified to comment on the merits of Mr. Mabee's lawsuit and to provide facts to the Court concerning the security of the electric grid and transparency in the regulatory process.

FERC's Inappropriate Use of FOIA Exemptions

7. Having thoroughly reviewed Mr. Mabee's declaration, it is clear to me that FERC is claiming that they cannot disclose the names of companies violating critical infrastructure protection (CIP) standards for supposed "national security purposes" on ground that these utilities' names are considered Critical Energy/Electric Infrastructure Information (CEII) and that disclosure "could reasonably be expected to endanger the life or physical safety of any individual" [FOIA Exemption 7(F)].

8. CEII is *"specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure (physical or virtual) that:*

- *Relates details about the production, generation, transmission, or distribution of energy;*
- *Could be useful to a person planning an attack on critical infrastructure;*
- *Is exempt from mandatory disclosure under the Freedom of Information Act; and*
- *Gives strategic information beyond the location of the critical infrastructure."*

9. FERC also considers CEII to be *"a system or asset of the bulk-power system, (physical or virtual) the incapacity or destruction of which would negatively affect: national security, economic security, public health or safety, or any combination of such matters."*

10. The name of a utility company is clearly not "a system or asset" which can be "incapacitated or destroyed." The name of a company is not "specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure (physical or virtual)" and gives no "strategic information beyond the location of the critical infrastructure." FERC might claim that the name of the company "could be useful to a person planning an attack on critical infrastructure," but this argument is null and void because the offending utilities have already mitigated the vulnerabilities which caused the enforcement actions in the first place.

11. Unless FERC is using CEII to protect the *reputation* of the utility company, this is an inappropriate excuse to deny disclosure. If FERC is in fact just trying to protect the reputation of these companies, *it is still an inappropriate excuse to deny disclosure.*

12. FERC's invoking of FOIA Exemption 7(F) is equally inappropriate. As the commander of an elite unit of Marines I have personally dealt with FOIA requests that "could reasonably be expected to endanger the life or physical safety of any individual." For example, a sailor in our unit was a highly skilled diver who participated in a highly sensitive dive mission with Joint Special Operations Command (JSOC) prior to coming to our unit. An award for heroism was mailed to our unit years after this operation and he was presented this award in a formation over which I presided. A picture was taken of only the medal on his uniform next to the words "U.S. Navy" embroidered on his uniform. Our higher headquarters posted this picture on social media (without naming the sailor) in an effort to recognize the service of members of our unit. Weeks later we received a FOIA request where a media outlet wanted to know the name of the sailor and the details surrounding the mission that led to his award. Our higher headquarters' judge advocate team appropriately argued that FOIA Exemption 7(F) should apply in this case because disclosing the sailor's identity and any details surrounding this highly sensitive mission "could reasonably be expected to endanger the life or physical safety of any individual" – i.e. the sailor and his family. Our heroic sailor has only one name and he and his family cannot change it. Utility companies can, and do, change names and ownership all the time. Disclosure of the name of a utility that has violated a CIP standard (and subsequently mitigated the offending vulnerability) *is not* a situation where one "could reasonably be expected to endanger the life or physical safety of any individual."

FERC Compared to Other Regulators of Critical Infrastructures

13. Not only is FERC inappropriately invoking CEII and inappropriately using FOIA exemptions, but they are setting a dangerous precedent for other government agencies charged with regulating critical infrastructures. FERC is the only agency I am aware of that hides the identities of companies that violate safety or security standards or when publicizing enforcement actions. While I could go through all 15 of the other forms of critical infrastructures, for the sake of the court's time, I have chosen to compare FERC to the regulators of just three critical infrastructure sectors: the nuclear sector, the transportation sector (which oversees pipelines), and the communications sector.

FERC Compared to the Nuclear Regulatory Commission (NRC)

14. For example, I will compare FERC disclosure of a physical security violation with that of the Nuclear Regulatory Commission (NRC) by referencing Mr. Mabee's Exhibits 116 and 117. In Exhibit 116 [NP18-14-000 NOP], NERC documented a violation of CIP-006-3c [Physical Security of Critical Cyber Assets] whereby the *"URE failed to document, implement, and maintain a physical security plan as required by CIP-006-3c R1. Specifically, during a routine inspection URE discovered that an air conditioning unit was an exploitable access point into an identified PSP (Physical Security Perimeter)."* In a worse case in the same NOP, the URE *"failed to document and implement the technical and procedural controls for monitoring physical access at all access points to the PSPs 24 hours a day, seven days a week. Specifically, the power supply to a security rack was shut off during maintenance work at one of URE's facilities, and for six days afterwards the facility was not communicating with URE's headquarters."*

15. It is important to point out that for both these physical security violations, the NOP clearly states, “*URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.*” Both vulnerabilities have been resolved for more than four years and even if they hadn’t, an attacker would have an incredibly difficult time finding which specific air conditioning unit to exploit or which facility wasn’t communicating with its headquarters by possessing merely the name of the offending utility. Yet FERC is resolute in concealing the name of that utility from public scrutiny on “national security” grounds. Contrast FERC’s approach with the NRC.

16. In Exhibit 117, Mr. Mabee makes it abundantly clear that a violation related to physical security (“*deliberately failing to perform firearm maintenance activities and falsifying records related to those activities*”) is treated entirely differently by the NRC who clearly named the violator – Holtec Decommissioning International, LLC.

FERC Compared to the Department of Transportation (DOT)

17. One can also compare FERC with the Department of Transportation (DOT) regarding pipeline security and pipeline safety. DOT maintains the Pipeline and Hazardous Materials Safety Administration (PHMSA) whose mission is “to protect people and the environment by advancing the safe transportation of energy and other hazardous materials that are essential to our daily lives.” Like FERC’s responsibilities, PHMSA “sets and enforces standards, educates, and conducts research to prevent incidents.”

18. Unlike FERC, PHMSA provides thorough reports to the public on all the agency’s enforcement activity via an online database that indicates how many enforcement cases are both initiated ("opened") and "closed" in a given year. [The database can be found here:

https://primis.phmsa.dot.gov/comm/reports/enforce/CasesOpen_opid_0.html?nocache=135#_TP_1_tab_1]

19. These PHMSA enforcement cases are initiated when an inspection identifies one or more probable violations of the pipeline safety statutes or regulations or in response to an accident. According to PHMSA, *“cases are “closed” only after PHMSA has determined that the required corrective actions have been completed by the operator, and after any corresponding civil penalties have been paid. In some cases, the corrective actions are so extensive or the agency's monitoring period is so protracted that the case may remain open for months or even years. This means that many of the cases which are shown as “closed” in a given year may have been initiated in prior years.”*

20. I have personally conducted a thorough review of the PHMSA enforcement database to compare its disclosure methodology with that of FERC. This review demonstrated that PHMSA undergoes a wide range of enforcement types and some are very similar to that of FERC. For example, one enforcement type is a “Corrective Action Order.” According to PHMSA, it “may issue a Corrective Action Order if it determines that a particular pipeline represents a serious hazard to life, property, or the environment.” PHMSA Corrective Action Orders are described 49 CFR 190.233 and “usually address urgent situations arising out of an accident, spill, or other significant, immediate, or imminent safety or environmental concern.” This description of the enforcement action is very similar to the type of justification used by FERC to invoke FOIA exemption 7(F) to conceal the identity of utilities violating NERC CIPs, yet PHMSA has no problem identifying the names of companies that are issued Corrective Action Orders.

21. For example, in one “Notice of Probable Violation” [CPF 3-2021-022-NOPV] PHMSA describes that its representatives conducted an inspection of ExxonMobil’s Control Room Management plan and procedures and records in Spring, Texas from July 27 through August 24, 2020 and found violations of “control room management” that appear very similar to the types of “control room management” violations noted in FERC’s notices of penalties, such as those provided by Mr. Mabee in Exhibits 113-116.

22. The PHMSA NOPV states: “*As a result of the inspection, it is alleged that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are: § 195.446 Control room management. (a) (e) Alarm management. Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms.*”

23. PHMSA found that “*Exxon’s records for monthly review of points having been taken off scan, have had alarms inhibited, generated false alarms, or that have had forced or manual values fail to comply with the regulation.*” For this, Exxon was fined, and the case proceeded through the PHMSA process to be mitigated and eventually closed. During the entire process, from opening to closing the case, PHMSA made no effort to deny the public access to the identity of the company found to have precipitated this serious safety and security violation.

[Details of this enforcement case can be found here:

[https://primis.phmsa.dot.gov/comm/reports/enforce/documents/32021022NOPV/32021022NOPV_PCP_05182021_\(20-187008\)_text.pdf](https://primis.phmsa.dot.gov/comm/reports/enforce/documents/32021022NOPV/32021022NOPV_PCP_05182021_(20-187008)_text.pdf)]

24. During my review of PHMSA’s enforcement database I confirmed that since 2002, PHMSA has initiated and closed a total of 4,395 cases and has publicly disclosed the identity of the company involved, *every single time*.

FERC Compared to Federal Communications Commission (FCC)

25. One can also compare FERC with the Federal Communications Commission (FCC) regarding enforcement issues concerning communications infrastructure security and safety, customer safety and privacy, and matters of national security. The FCC Enforcement Bureau maintains three divisions with enforcement duties. The Spectrum Enforcement Division *“investigates and takes or recommends enforcement action, where appropriate, in cases involving violation of technical rules such as 911 and E911, radio frequency equipment importation or marketing, unlicensed or unauthorized operation, tower lighting and marking, RF safety, cable signal leakage and EAS.”* The FCC’s 25 Field Offices *“conduct inspections and investigations of FCC regulated facilities, take or recommend enforcement action, where appropriate, for violation of technical rules such as radio frequency equipment importation or marketing, unlicensed or unauthorized operation, tower lighting and marking, RF Safety, cable signal leakage and EAS, and resolve or assist with the resolution of interference complaints.”* The Market Disputes Resolution Division *“adjudicates formal Section 208 complaints against common carriers (wireline and wireless) and participates in negotiations between parties to facilitate settlement of disputes before complaints are filed.”*

26. The FCC maintains a website that hosts public notices of the agency’s enforcement actions. These are located in a section labeled “Commission Documents (EDOCS)” which can be found here: <https://www.fcc.gov/documents>. Within these publicly available documents, the FCC provides notices of enforcement actions that clearly name violators.

27. Provided below are just three examples of public notices of FCC enforcement actions where the violators are clearly named:

- Title: “Four Companies Settle FCC Investigations of Compliance with 911 Rules”

Summary: “AT&T, CenturyLink (now Lumen Technologies), Intrado, and Verizon agreed to make a settlement payment and implement a compliance plan to ensure adherence to these 911 rules.”

Link:

<https://www.fcc.gov/document/four-companies-settle-fcc-investigations-compliance-911-rules>

- Title: “FCC Proposes \$660K Fine Against Truphone in Foreign Ownership Case”

Summary: “FCC proposes a \$660,639 fine against Truphone, Inc. for apparently exceeding statutorily prescribed foreign ownership limits in its FCC-issued licenses without Commission approval and for apparent unauthorized transfers of control.”

Link:

<https://www.fcc.gov/document/fcc-proposes-660k-fine-against-truphone-foreign-ownership-case>

- Title: “Citation to Massey, Wood and West and MWW Realty for Unlit Tower”

Summary: “The Enforcement Bureau of the Federal Communications Commission directs Massey, Wood and West, Inc. and MWW Realty Corp. to take immediate steps to comply with FCC antenna structure lighting and registration regulations”

Link:

<https://www.fcc.gov/document/citation-massey-wood-and-west-and-mww-realty-unlit-tower>

28. The FCC also issues enforcement actions such as a “Notice of Apparent Liability for Forfeiture and Admonishment” without concealing the names of violators. In one such notice

[File No.: EB-TCD-18-00027702], the FCC levied a massive fine against a cellular provider in the United States. The Commissioners stated, *“In this Notice of Apparent Liability, we propose a penalty of \$91,630,000 against T-Mobile USA, Inc. (T-Mobile or Company) for apparently violating section 222 of the Communications Act and the Commission’s regulations governing the privacy of customer information. We find that T-Mobile apparently disclosed its customers’ location information, without their consent, to third parties who were not authorized to receive it. In addition, even after highly publicized incidents put the Company on notice that its safeguards for protecting customer location information were inadequate, T-Mobile apparently continued to sell access to its customers’ location information for the better part of a year without putting in place reasonable safeguards—leaving its customers’ data at unreasonable risk of unauthorized disclosure.”* In this case, the actions of the cellular provider could have caused harm to the individual customers and in holding the company accountable, the FCC was fully transparent about the identity of company precipitating this serious violation.

29. During my review of the FCC enforcement page I was not able to find any areas where the Commission avoided publicly naming the violator of its regulations.

CONCLUSION

30. I have a number of other examples of other agencies and how they report, publicly, the name of the violators of civil violations. I could provide these in either testimony to the Court or a second Declaration, if that is necessary or desirable. Given the in-depth comparisons I have provided to other federal regulators, along with my own professional analysis of the use of CEII and FOIA exemptions, I conclude that FERC is inappropriately and unjustly denying Mr. Mabee’s FOIA requests. I further conclude that releasing the names of these regulatory violators will not be a breach of CEII, nor will it pose any threat to any person.

Pursuant to 28 U.S.C. § 1746, I hereby affirm under penalty of perjury that the foregoing declaration is true and correct.

Executed this 7th day of June, 2022 at Hammond, Louisiana.

/s/ Thomas J. Waller Jr.

Thomas J. Waller Jr.

leaving EPRI in 2002, I went to work for KEMA, Inc. where I served as the technical lead for the cyber security practice and started the first control system cybersecurity conference in 2002. Between 2003 and 2004, I helped the Idaho National Laboratory establish the Supervisory Control and Data Acquisition (SCADA) Test Bed. Through MITRE Corp. (a private no-for-profit company providing engineering and technical guidance for the Federal government), I supported the National Institute on Standards and Technology (NIST) in extending SP800-53 (a catalog of security controls for all information systems of the U.S. Federal government except those related to national security) for control systems. I supported the Pacific Northwest National Laboratory (PNNL) in supporting the Nuclear Regulatory Commission (NRC) on the development of the Regulatory Guide for nuclear plant cyber security (Reg Guide 5.71). I was a contractor who supported the U.S. Navy Mission Assurance Division on the Aurora hardware vulnerability and the Federal Energy Regulatory Commission (FERC) on control system cyber issues, including a review of the utilities' responses. I also worked under contract with the International Atomic Energy Agency (IAEA) on nuclear plant cyber security. I have testified to both House and Senate hearings on control system cyber security. I have conducted numerous control system cyber security assessments and developed control system cyber security policies. I am the Managing Director of the international standards on control system cyber security – ISA99 (the ISA62443 series of standards) and a participant in various international cyber security standards efforts. I have also worked on the North American Electric Reliability Corporation (NERC) Critical Infrastructure Protection (CIP) process since 2003 when it was initially conceived as the NERC Critical Infrastructure Protection Working Group to respond to a FERC “request” to do “something” about cyber security of the grid. Overall, I believe that I am

well qualified to comment on the merits, and testify if necessary, of Mr. Mabee's lawsuit as it pertains to cybersecurity concerns for the electric grid and transparency in the regulatory process.

Limitations of the NERC CIPs.

3. Originally, the NERC CIP process was meant to address the entire utility infrastructure. FERC Order 672 states the following: "321. The proposed Reliability Standard must address a reliability concern that falls within the requirements of section 215 of the FPA. That is, it must provide for the reliable operation of Bulk-Power System facilities. It may not extend beyond reliable operation of such facilities or apply to other facilities. Such facilities include all those necessary for operating an interconnected electric energy transmission network, or any portion of that network, including control systems. The proposed Reliability Standard may apply to any design of planned additions or modifications of such facilities that is necessary to provide for reliable operation. It may also apply to Cybersecurity Protection." [see FERC Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards, 18 CFR Part 39; Docket No. RM05-30-000; Order No. 672; Issued February 3, 2006; Paragraph 321 at 130, available at:

<https://cms.ferc.gov/sites/default/files/2020-04/20060203-3003%2814677850%29.pdf>]

4. However, over time, the scope has been scaled back to what it is today: bulk electric system electronic routable communications for selected assets and the associated programmatic compliance program. The detailed scope of the latest version of the NERC CIPs can be found at <https://www.nerc.com/pa/Stand/Pages/CIPStandards.aspx>.

5. The NERC CIPs were explicitly developed to exclude control system field devices such as process sensors, actuators, relays as they are inside the Electronic Security Perimeter

(ESP), which NERC defines as “the logical border surrounding a network to which BES Cyber Systems are connected using a routable protocol.” I am critical of the ESP concept, as NERC defines it because the ESP can be not only the routers, firewalls and switches in a control center, but anywhere a person is communicating via a cell phone to the utility’s SCADA system. However, I recognize that the NERC system is what is in place, and my comments below are attempting to point out why Mr. Mabee’s requested information of entity names of mitigated NOPs will pose no potential danger to any person.

6. Given the major exclusions in NERC CIPs, any information published in NERC compliance audits regarding the identity of CIP violators does not compromise the reliability of the electric grid. There is no basis for FERC to assert that releasing the names of the violators would endanger a person or property, especially since violations of NERC CIP rules are often programmatic in nature. Moreover, since the violations have been mitigated (according to NERC and FERC through the issued “No Further Review” letter), there is no basis to assert that the names somehow constitute CEII.

Critical Energy/Electric Infrastructure Information (CEII)

7. According to FERC (at <https://www.ferc.gov/ceii>), “Critical Energy/Electric Infrastructure Information (CEII) is specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure (physical or virtual) that:

1. Relates details about the production, generation, transmission, or distribution of energy;
 2. Could be useful to a person planning an attack on critical infrastructure;
 3. Is exempt from mandatory disclosure under the Freedom of Information Act;
- and

4. Gives strategic information beyond the location of the critical infrastructure.”

8. According to FERC (at <https://www.ferc.gov/ceii>), “*Critical energy/electric infrastructure* means a system or asset of the bulk-power system, (physical or virtual) the incapacity or destruction of which would negatively affect: national security, economic security, public health or safety, or any combination of such matters.”

Case Study on CEII: Michael Mabee’s Exhibit 115 - NP18-7-000

9. NERC CIP penalties are based on not meeting NERC CIP compliance. In NOP case NP 18-7-000, the Registered Entity’s unrestricted firewall access on the first connection to the Electronic Security Perimeter did not follow an access control model that denied access by default. The Registered Entity’s direct outside connection on the second connection was a failure to only enable ports within the Electronic Security Perimeter. The Registered Entity mitigated this violation by correcting: (i) the rule set on the firewall for the two outbound circuits at issue; and (ii) the cabling error that connected the Critical Cyber Asset servers to an outbound node. Actions taken included reconnecting these two circuits through a proper Electronic Security Perimeter border firewall and configuring the necessary firewall rule sets to appropriately restrict access.

10. This case (NP18-7-000) is almost 10 years old and the violation was addressed after being identified. It is my opinion that the case is clearly not CEII and thus would not negatively affect national security, economic security, public health, or safety, or put any individual at risk of harm. Moreover, in this case, NERC wants to continue maintaining anonymity of the utility for CEII reasons even though the utility has been publicly identified (see below).

Case Study on CEII: Students Find Public Information that CAN Be CEII

11. There is a significant amount of information in the public domain that can be considered CEII that has not been addressed by the utilities. I have been a research associate at the University of Missouri Science & Technology and this semester students were given a research assignment to select a utility or engineering company and then determine how well the company met the NIST Cyber Security Framework using only publicly available information.

12. While that research uncovered numerous examples of what may have been CEII in the public domain, one of these cases is independently relevant here as it is a name denied to Mr. Mabee but which is publicly available.

13. The Wall Street Journal reported that in May 2016 PG&E experienced a data breach of a database involving confidential information about its systems of 30,000 records that left it exposed on the internet for 70 days. PG&E was fined \$2.7 million by FERC. The breach of the database contained information from over 47,000 PG&E computers, virtual machines, servers, and other devices: specifically, IP addresses, operating systems, hostnames, locations, MAC addresses, and the 120 hashed employee passwords, or the plaintext NTLM, SOAP, and mail passwords. In May 2016 it doesn't appear that PG&E could accurately detect unexpected data flows which included customer information being exported from an internal database and exiting the network. It took PG&E 70 days to notice the cybersecurity breach. It should be noted this is the utility identified above that NERC said could not be publicly identified to Mr. Mabee for CEII reasons in NP-18-7-000. This failure was fully remediated by PG&E years ago and poses no threat to the critical infrastructures.

CONCLUSIONS

14. The information which NERC asserts is CEII, such as the name of the CIP violator in docket No. NP-18-7-000, the PG&E case discussed in paragraphs 9-10 above, often is not actually CEII. Assuming the utility has mitigated their CIP violations, identifying the utility by name does not constitute CEII nor can it be reasonably expected to endanger any individual or property.

15. Utilities still have common problems that need to be publicly identified for Congressional scrutiny of the regulatory system and for corporate credit rating agencies to understand their risk. Students with no utility or compliance experience demonstrated what CEII information continues to exist out in the open for attackers to find and exploit.

16. Identifying utilities that have experienced NERC CIP violations could not “reasonably be expected to endanger life or physical safety.” That is because by the time the NERC violation has been made public, it has already been remediated. This is similar to the Department of Homeland Security (DHS) ICS-CERT’s cyber vulnerability notifications. These public notifications, which include detailed identification of the products, are sent after mitigation has been identified. FERC’s use of FOIA exemption 7(F) to claim that releasing the names of CIP violators “could reasonably be expected to endanger the life or physical safety of any individual” is not protecting the safety or security of the Nation. Rather, it is protecting the “reputation” of the affected utility from the type of public, investor and Congressional scrutiny that would actually bolster national security.

Pursuant to 28 U.S.C. § 1746, I hereby affirm under penalty of perjury that the foregoing declaration is true and correct.

Executed this 7th day of June, 2022 at 10029 Oakleaf Place Cupertino, CA 95014

/S/ Joseph M. Weiss

Joseph M. Weiss

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL MABEE,

Plaintiff,

V.

FEDERAL ENERGY REGULATORY
COMMISSION,

Defendant.

Civil Action No. 19-3448 (FYP)

**PLAINTIFF’S STATEMENT OF FACTS AND RESPONSE TO DEFENDANT’S
STATEMENT OF FACTS**

Plaintiff Michael Mabee (“Mabee” or “Plaintiff”) respectfully responds to Defendant’s Statement of Facts [ECF No. 41-1] and presents additional material facts as follows:

Plaintiff's Response to Defendant's Statement of Facts (1-17):

1. On July 20, 2006, NERC was certified by FERC pursuant to authority delegated under section 215 of the Federal Power Act as the nation's designated Electric Reliability Organization. 116 FERC ¶ 61,062. Plaintiff ADMITS.

2. NERC became responsible for, among other things, the development and enforcement of reliability standards designed to maintain the reliability of the United States' electric grid. *Id.* Plaintiff DENIES. NERC has these responsibilities for the “bulk power system,” which is only one part of the electric grid. NERC generally does not have jurisdiction over the generation and

distribution portions of the electric grid. ¶ 10 Declaration of Michael Mabee (“Mabee Decl.”) [filed herein].

3. Such reliability standards include requirements associated with ensuring the physical security of electric infrastructure as well as requirements associated with ensuring the integrity of electric cyber security infrastructure. *Id.*; ¶ 8 Declaration of Barry Kuehnle (“Kuehnle Decl.”) [ECF No. 41-2.] Plaintiff ADMITS.

4. The reliability standards at issue here—the Critical Infrastructure Protection Reliability Standards—address matters such as background checks for employees with access to critical cyber assets, assuring that electric utilities and other industry stakeholders timely install security patches to protect software, and adequately training of electric utility staff on cyber security response measures. ¶ 8 Kuehnle Decl. [ECF No. 41-2.]. Plaintiff ADMITS.

5. NERC, together with its six “Regional Entities” located throughout the United States and Canada, conducts audits and other assessments regarding electric utility companies’ compliance with the Reliability Standards. *Id.* ¶ 9. Plaintiff ADMITS that this is correct on paper but notes that in reality NERC enforcement has decreased over the years and become more industry friendly, e.g., more warnings and less penalties. ¶¶ 29-30 Mabee Decl. [filed herein].

6. NERC and the Regional Entities may refer audit findings to their enforcement staff as potential violations of the Reliability Standards. *Id.* ¶ 10. Plaintiff ADMITS.

7. NERC files a “Notice of Penalty” with FERC. *Id.*; *see also* 16 U.S.C. § 824o(e)(2); 18 C.F.R. § 38.7(e). Plaintiff DENIES that 18 C.F.R. § 38.7(e) is the regulation involved; Plaintiff ADMITS that 18 C.F.R. § 39.7(e) is the regulation involved.

8. Section 215(e)(2) of the Federal Power Act provides that a penalty submitted by NERC “may take effect no earlier than 31 days after NERC files with [FERC] [the] notice of

penalty and record of the proceedings.” 16 U.S.C. § 824o(e)(2); *see also* 18 C.F.R. § 38.7(e).

Plaintiff DENIES that 18 C.F.R. § 38.7(e) is the regulation involved; Plaintiff ADMITS that 18 C.F.R. § 39.7(e) is the regulation involved.

9. The Federal Power Act states that “[s]uch penalty shall be subject to review by [FERC], on its own motion or upon application by the user, owner or operator that is the subject of the penalty filed within 30 days after the date such notice is filed with [FERC].” *Id.* Plaintiff ADMITS.

10. NERC’s typical practice has been to file the Notices of Penalty pertaining to violations of the Reliability Standards that involve grid operations (*e.g.*, vegetation management and balancing generation and load), as a public document without seeking a Critical Energy Infrastructure Information designation. ¶ 10 Kuehnle Decl. [ECF No. 41-2]. Plaintiff DENIES. Examples relevant to this judicial review are NP11-1-000, NP11-128-000 and NP11-137-000. ¶¶ 43-48 Mabee Decl. [filed herein].

11. For violations of the Reliability Standards that pertain to cyber security or physical security of the electric grid, NERC has requested that certain information be designated as Critical Energy Infrastructure Information. *Id.* Plaintiff DENIES. NERC initially released the names of violators to the public and only began withholding them in July 2010. Prior to that time they were routinely released. ¶ 23 Mabee Decl. [filed herein].

12. NERC’s public version of a Critical Infrastructure Protection-related Notice of Penalty does not contain the names of the relevant Entities and contains less detail regarding violations in order to avoid the disclosure of information that would be useful to individuals targeting attacks directed at critical electric infrastructure. *Id.* Plaintiff DENIES. NERC initially released the names of violators to the public and only began withholding them in July 2010.

Plaintiff asserts that FERC is not withholding the names of the regulatory violators to “protect the grid” but is withholding records to protect NERC and the utilities from embarrassment and accountability. ¶ 13 Mabee Decl. [filed herein].

13. The non-public Notices of Penalties contain the names of Entities found to have violated the Reliability Standards as well as additional details regarding the nature of the relevant violations. *Id.* Plaintiff does not have access to the non-public Notices of Penalties and therefore cannot answer.

14. FERC disclosed Entity identities associated with the 253 Notices of Penalty. *See* Production. Plaintiff ADMITS that FERC disclosed 141 out of 1,490 entity identities associated with the 253 Notices of Penalty. ¶ 38 Mabee Decl. [filed herein].

15. FERC withheld some entity identities, relying on Exemptions 3 and 7(F). 5 U.S.C. §§ 552(b)(3), (b)(7)(F). *Id.* Plaintiff ADMITS.

16. The energy grid’s distribution systems “face significant cybersecurity risks—that is, threats, vulnerabilities, and impacts—and are increasingly vulnerable to cyberattacks.” GAO-21-81 Electricity Grid Cybersecurity (March 2021). Plaintiff ADMITS that this quote is from the cited GAO report, but points out that neither NERC nor FERC has jurisdiction over the “[t]he energy grid’s distribution systems.” NERC and FERC have jurisdiction over the *bulk power system*, not the *distribution system*. ¶ 12 Mabee Decl. [filed herein].

17. “Threat actors are growing more adept at exploiting these vulnerabilities to execute cyberattacks.” *Id.* Plaintiff ADMITS.

Plaintiff’s Statement of Facts (18-end):

18. NERC submitted the first Critical Infrastructure Protection (CIP) Notices of Penalty (“NOPs”) to FERC on June 4th and 5th of 2008. The NOPs were filed against 17 entities, all of

whom were publicly named in the NOPs. (See Dockets NP08-8-000, NP08-9-000, NP08-11-000, NP08-12-000, NP08-13-000, NP08-15-000, NP08-16-000, NP08-17-000, NP08-18-000, NP08-19-000, NP08-20-000, NP08-22-000, NP08-24-000, NP08-25-000, NP08-28-000, NP08-30-000, and NP08-31-000.) ¶ 23 Mabee Decl. [filed herein].

19. On July 3, 2008 FERC issued a notice that it would not review the 17 CIP NOPs issued on June 4th and 5th of 2008. FERC also issued guidance in this order for future NOPs. Nowhere in this guidance did the issue of withholding an entity's name arise. See FERC Order 124 FERC ¶ 61,015.

20. Between June 2008 and June 2010, NERC included the name of the entity in all CIP violation NOPs submitted to FERC and available to the public and only began withholding the names in July 2010. ¶ 39 Mabee Decl. [filed herein].

21. Between June 2008 and June 2010, NERC publicly released the names of 261 CIP standards violators on their website as well as in public filings with FERC. ¶ 23 Mabee Decl. [filed herein].

22. Between July 2010 and November 2013 NERC released 124 additional names of CIP standard violators in publicly available NOPs and on their website. NERC withheld the names of 1,729 CIP violators during the same period. ¶¶ 24-25 Mabee Decl. [filed herein].

23. Starting on July 10, 2010, NERC began withholding most of the names of regulatory violators of CIP standards on their website and in public filings with FERC. ¶ 24 Mabee Decl. [filed herein].

24. After November 27, 2013 NERC began withholding all of the names of regulatory violators of CIP standards on their website and in public filings with FERC. Exhibit 101, 102, ¶ 26 Mabee Decl. [filed herein].

25. On December 18, 2018 Plaintiff filed a FOIA Request for 52 FERC Notice of Penalty (NOP) Dockets. On January 4, 2019, Plaintiff amended his FOIA request, adding one docket that had been inadvertently omitted (bringing the total to 53 dockets). FERC Acknowledged this request as FOIA No. FY19-19 (also referred to in some correspondence as FOIA No. 2019-0019). Exhibit 103, ¶ 34 Mabee Decl. [filed herein].

26. On January 12, 2019 Plaintiff filed a FOIA request for 190 FERC NOP Dockets. FERC Acknowledged this request as FOIA No. FY19-30 (also referred to in some correspondence as FOIA No. 2019-0030). Exhibit 104, ¶ 34 Mabee Decl. [filed herein].

27. On August 3, 2019 Plaintiff filed a FOIA request for 10 FERC NOP Dockets. FERC Acknowledged this request as FOIA No. FY19-99 (also referred to in some correspondence as FOIA No. 2019-0099). Exhibit 105, ¶ 34 Mabee Decl. [filed herein].

28. Plaintiff's three FOIA requests pertinent to this judicial review requests the names of all "Unidentified Registered Entities" in 253 NOP dockets filed with FERC between July 2010 and July of 2019. Thus, all NOPs in this judicial review were filed between 3 to 12 years ago. ¶ 39 Mabee Decl. [filed herein].

29. Some of the 253 NOPs are filed against a single entity while some of the NOPs are filed against multiple entities. In total, Plaintiff understands that the 253 dockets represent 1,490 total entity names that were withheld from the public by NERC when the NOPs were submitted to FERC. ¶ 27 Mabee Decl. [filed herein].

30. FERC has issued a "Notice of No Further Review" on all 253 NOP dockets associated with this judicial review, finalizing the NOPs as a matter of law. ¶ 40 Mabee Decl. [filed herein].

31. According to NERC's documents, all violations associated with 252 of the 253 dockets in this judicial review have been mitigated. The one possible exception is Docket NP19-4-000. ¶ 41 Mabee Decl. [filed herein].

32. It is unknown to Plaintiff if the violations associated with Docket NP19-4-000 have been mitigated as that information is no longer available to the public. Mabee ¶ 42 Mabee Decl. [filed herein].

33. On August 29, 2019, FERC issued a "Notice of No Further Review" on Docket NP19-4-000, making the NOP final. ¶ 42 Mabee Decl. [filed herein].

34. On November 7, 2019, FERC denied Plaintiff's request to release the name associated with Docket NP19-4-000. This docket was part of Plaintiff's August 3, 2019 FOIA request no. 2019-0099. Exhibit 105, ¶ 42 Mabee Decl. [filed herein].

35. In all cases but one, relevant to this judicial review, NERC filed the NOPs with FERC *after* the mitigation was completed. The only exception to this that Plaintiff is aware of is involving dockets subject to this judicial review is Docket NP19-4-000. ¶ 42 Mabee Decl. [filed herein].

36. When FERC issues a "Notice of No Further Review" and 30 days have passed since the NOP was filed NERC's NOP becomes final. ¶ 40 Mabee Decl. [filed herein].

37. Critical Infrastructure Protection (CIP) standards concern both physical security as well as cybersecurity. ¶ 19 Mabee Decl. [filed herein].

38. Plaintiff's three requests that are the subject of this judicial review includes requests for the identities of violators of both physical security and cyber security CIP standards. Exhibit 102, ¶ 27 Mabee Decl. [filed herein].

39. Plaintiff has identified at least five dockets in this judicial review where FERC denied Plaintiff's FOIA request to release the name of the violator, but released the name to another FOIA requester or in a public order. The five dockets described here are: Dockets No. NP11-1-000, No. NP12-20-000, No. NP18-7-000, No. NP11-59-000 and No. NP12-9-000. ¶ 49 Mabee Decl. [filed herein].

40. NERC has included violations of other non-CIP reliability standards in the CIP NOPs, causing the names of non-CIP violators to be withheld from the public. Examples relevant to this judicial review are NP11-1-000, NP11-128-000, NP11-137-000 and NP12-20-000 in which violations of standard FAC003-1 (Transmission Vegetation Management) were included with CIP violations and the names of the violators withheld from the public. Violations of transmission¶ 43 Mabee Decl. [filed herein].

41. On April 28, 2020 FERC denied Plaintiff's request to release the name associated with Docket NP11-128-000. This docket was part of Plaintiff's January 12, 2019 FOIA request no. 2019-0030. Exhibit 104, ¶ 45. Mabee Decl. [filed herein].

42. On May 27, 2020 FERC denied Plaintiff's request to release the name associated with Docket NP11-137-000. This docket was part of Plaintiff's January 12, 2019 FOIA request no. 2019-0030. Exhibit 104, ¶ 44 Mabee Decl. [filed herein].

43. On November 25, 2020 FERC denied Plaintiff's request to release the name associated with Docket NP12-20-000. This docket was part of Plaintiff's January 12, 2019 FOIA request no. 2019-0030. Exhibit 104. However, on September 19, 2019 FERC granted another FOIA requestor's request to release the name associated with Docket NP12-20-000. Exhibit 107, ¶¶ 46, 50 Mabee Decl. [filed herein].

44. On January 20, 2021 FERC denied Plaintiff's request to release the name associated with Docket NP11-1-000. This docket was part of Plaintiff's January 12, 2019 FOIA request no. 2019-0030. Exhibit 104. However, on September 19, 2019 FERC granted another FOIA requestor's request to release the name associated with Docket NP11-1-000. Exhibit 107, ¶¶ 47,51 Mabee Decl. [filed herein].

45. On February 26, 2021 FERC denied Plaintiff's request to release the name associated with Docket NP18-7-000. This docket was part of Plaintiff's December 18, 2018 FOIA request no. 2019-0019. Exhibit 103. However, FERC had previously released the name of the entity to Plaintiff on August 28, 2018. (See FOIA No. 18-75.) Exhibit 110, ¶ 52 Mabee Decl. [filed herein].

46. On December 22, 2010 NERC filed a NOP in Docket No. NP11-59-000 against an "Unidentified Registered Entity". The NOP found that the "Unidentified Registered Entity" had violated a cybersecurity standard, CIP-004-1, and was assessed a \$7,000 penalty. The "Unidentified Registered Entity" petitioned FERC to recover the cost of the penalties from its ratepayers (FERC Docket ER11-2798-000). Exhibit 120, ¶ 53 Mabee Decl. [filed herein].

47. On May 6, 2011, FERC publicly identified the "Unidentified Registered Entity" cited in Docket No. NP11-59-000 in conjunction with the cost recovery request as Midwest Independent Transmission System Operator, Inc. (FERC Docket ER11-2798-000). See FERC Order at 135 FERC ¶ 61,118. Exhibit 120, ¶ 53 Mabee Decl. [filed herein].

48. On March 30, 2020 FERC denied Plaintiff's request to release the name associated with Docket NP11-59-000. ¶ 53 Mabee Decl. [filed herein].

49. On December 30, 2011 NERC filed a NOP in Docket No. NP12-9-000 against an "Unidentified Registered Entity." The NOP found that the "Unidentified Registered Entity" had

violated a cybersecurity standard, CIP-004-1, and was assessed a \$60,000 penalty. ¶ 54 Mabee Decl. [filed herein].

50. On February 16, 2012, Midwest Independent Transmission System Operator, Inc. (MISO), admitting publicly that it was the “Unidentified Registered Entity” in NP12-9-000, petitioned FERC to recover the cost of the penalties from its ratepayers (FERC Docket ER12-1112-000) See (Exhibit 121 at 1.) On April 16, 2012 FERC publicly approved the cost recovery request. (Exhibit 121 at 2.) On April 16, 2012 FERC approved MISO’s petition to recover costs, thereby confirming that MISO was the subject “Unidentified registered Entity.” See FERC Order 139 FERC ¶ 61,038. Thus, the identity of the “Unidentified Registered Entity.” was made publicly available in FERC’s docket. ¶ 54 Mabee Decl. [filed herein].

51. On September 25, 2020 FERC denied Plaintiff’s request to release the name associated with Docket NP12-9-000. This docket was part of Plaintiff’s January 12, 2019 FOIA request no. 2019-0030. Exhibit 112, ¶ 54 Mabee Decl. [filed herein].

52. Plaintiff has found four FERC orders in which FERC approved requests by the CIP violators to pass CIP violation penalties on to their customers: FERC Docket ER11-2798-000, FERC Docket ER12-1112-000, FERC Docket ER15-764-000 and FERC Docket ER19-2362-000. In each instance, the identity of the violator was withheld from the public when the NOP was issued. In each instance, a separate docket was opened with an obscure “public notice” in the Federal Register which, in all four cases, did not give the public adequate information to determine if they were impacted. And in each case, FERC approved the penalty being passed on to the public. ¶ 55 Mabee Decl. [filed herein].

53. Before Plaintiff filed this judicial review on November 15, 2019, Defendant only processed 1.9 dockets per month. It would have taken 11 years to process 253 dockets at the rate of 1.9 per month. ¶ 36 Mabee Decl. [filed herein].

54. After Plaintiff filed this judicial review on November 15, 2019, and the Court issued its January 28, 2020 Minute Order, Defendant processed 11.4 dockets per month and finished production in January of 2022. ¶ 37 Mabee Decl. [filed herein].

55. On November 17, 2016 FERC issued Order No. 833 which provided: “In response to the Trade Associations’ comments seeking clarification if a name or location of a facility should be protected as CEII, the Commission’s current practice is that information that ‘simply give[s] the general location of the critical infrastructure’ or simply provides the name of the facility is not CEII.” See 157 FERC ¶ 61,123 at 17.

56. 18 CFR § 388.113(e)(1) provides that the designation of Critical Energy/Electric Infrastructure Information (CEII) “may last for up to a five-year period, unless re-designated.” ¶ 48 Mabee Decl. [filed herein].

57. The CEII designation by NERC on all NOPs over 5 years old has expired and has not been re-designated. Therefore, all names of entities over 5 years old are no longer CEII by regulation. ¶ 48 Mabee Decl. [filed herein].

58. In its 2021 “Compliance Monitoring and Enforcement Program Annual Report” NERC stated: “For all REs, 100 percent of mitigation for noncompliance discovered in 2015 or before has been reported as complete. Registered entities have made significant progress in mitigating older noncompliance from 2016-2018, with nearly 98.3 percent or more of noncompliance discovered in those years having been mitigated.” See:

<https://www.nerc.com/pa/comp/CE/ReportsDL/2021%20CMEP%20Annual%20Report.pdf>
(page 25). ¶ 31 Mabee Decl. [filed herein].

59. In its 2021 “Compliance Monitoring and Enforcement Program Annual Report” NERC stated: “Approximately 85 percent of all noncompliance processed in 2021 was processed via the CE and FFT disposition methods, which require no settlement agreement and have no penalties associated with them. This was a decrease from 2020, which saw approximately 91 percent of all noncompliance processed via the CE and FFT disposition methods. This change is a result of an increased percentage of Spreadsheet Notice of Penalties (SNOPs) and full NOPs filed in 2021 compared with 2020 (see figure A.10).” See:

<https://www.nerc.com/pa/comp/CE/ReportsDL/2021%20CMEP%20Annual%20Report.pdf>
(page 25). ¶¶ 29-30 Mabee Decl. [filed herein].

60. Of the 1,490 “Unidentified Registered Entity” names requested in Plaintiff’s three FOIA requests, Defendant released 141 “Unidentified Registered Entity” names. Defendant refused to release 1,349 “Unidentified Registered Entity” names. ¶ 38 Mabee Decl. [filed herein].

61. Christopher Robert Vickery is the security researcher referenced by NERC in NOP NP18-7-000 who originally discovered the data breach by PG&E. ¶ 2 Declaration of Christopher Robert Vickery (“Vickery Decl.”) [filed herein].

62. George Cotter is a nationally known cybersecurity expert with decades of experience including high level positions at the NSA. ¶¶ 3-5 Declaration of George Cotter [filed herein].

63. Joseph Weiss is a nationally known cybersecurity expert with decades of experience including work related directly to NERC Critical Infrastructure Protection (CIP) standards. ¶ 2 Declaration of Joseph Weiss [filed herein].

64. Thomas Waller is an expert on threats to the U.S. critical infrastructures, including the electric grid. ¶¶ 3-6 Declaration of Thomas Waller [filed herein].

65. Tyson Slocum is an expert on the U.S. Energy Sector, including the electric grid. He has directly been involved with some of the FERC dockets involved in this judicial review. ¶¶ 1-4 Declaration of Tyson Slocum [filed herein].

Dated this 13th day of June, 2022.

Respectfully submitted,

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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL MABEE,

Plaintiff,

V.

FEDERAL ENERGY
REGULATORY COMMISSION,

Defendant.

Civil Action No. 19-3448 (FYP)

**PLAINTIFF’S MEMORANDUM OF POINTS AND AUTHORITIES IN OPPOSITION
TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT AND IN SUPPORT OF
PLAINTIFF’S CROSS-MOTION FOR SUMMARY JUDGMENT**

I. INTRODUCTION

“Publicity is justly commended as a remedy for social and industrial diseases. Sunlight is said to be the best of disinfectants; electric light the most efficient policeman.”

- Justice Louis D. Brandeis

This famous quote sets the tone for this case. The quote originated with *Other People's Money*, and was later repeated by the Supreme Court in *Buckley v. Valeo*. 424 U.S. 1, 67 (1976) (per curiam) and n. 80 (quoting L. Brandeis, *Other People's Money* 62 (National Home Library Foundation ed. 1933)).

Plaintiff Michael Mabee (“Plaintiff” or “Mabee” or “Mr. Mabee”) is seeking Freedom of Information Act (FOIA) disclosure of records showing the names of regulatory violators, to wit: entities that own or operate portions of the electric grid, which have been found to have violated Defendant, the Federal Energy Regulatory Commission’s (“FERC”) approved

North American Electric Reliability Corporation (“NERC”) mandatory reliability standards. NERC is the “self-regulator” for the part of the electric grid known as the bulk power system and NERC’s quasi-governmental function as the federally designated “Energy Reliability Organization” under Section 215 of the Federal Power Act is overseen by FERC. *See* 16 U.S.C. §§ 791-825r.

FERC approves NERC enforcement actions by issuing “No Further Review” letters accepting, *inter alia*, NERC’s representations of completed mitigation of the violations. [filed herein] (Declaration of Michael Mabee)(“Mabee Decl.”), ¶ 21. This FERC action generally follows a NERC Notice of Penalty (“NOP”). [filed herein] Mabee Decl., ¶ 21.

Beginning in 2010, NERC began withholding the names of the regulatory violators at issue in this case from the public and FERC went along with NERC’s scheme. These withheld regulatory violator names are known by NERC and FERC as “Unidentified Registered Entities” or “UREs.” Mabee Decl. ¶ 11.

The requests for the names of the entities that committed the violations range from three to 12 years ago. Specifically, from the oldest violation on July 6, 2010 to the most recent violation dated July 31, 2019. [filed herein] Mabee Decl., ¶ 39.

II. BACKGROUND SUMMARY AND ISSUES FOR THE COURT

Plaintiff made three written requests seeking records showing the names of electric utility companies who have received an NOP for violations of mandatory reliability standards, known as Critical Infrastructure Protection (“CIP”) standards. At Defendant’s request, Plaintiff agreed to narrow the scope of his request to only the name of the regulatory violator inserted with the

docket number onto the first page of the public version of the NOP. [filed herein] Ex. 106; [filed herein] Mabee Decl., ¶ 35.

This judicial review presents two issues for the Court:

- 1) Does the “FAST Act” addition of Section 215A to the Federal Power Act, 16 U.S.C. § 824o-1, allow FERC, via Exemption 3, to withhold the entity names associated with mitigated NOP?
- 2) Is the release of the records showing only the names of the regulatory violators associated with a mitigated NOP properly withheld under Exemption 7(F)?

Even though Defendant has the burden of proof, Plaintiff presents substantial declarations proving FERC has violated FOIA and that this Court must compel Defendant to release the records sought.

III. PROCEDURAL POSTURE

A. Plaintiff Has Exhausted His Administrative Remedies.

Plaintiff has made three different requests totalling 253 dockets. On December 18, 2018, Plaintiff submitted a request for “NERC Full Notice of Penalty version which includes the name of the registered entity” for 53 dockets. [ECF No. 1] Complaint, at 7-8. The first request was assigned the control number FOIA No. #2019-0019 by Defendant. *Id.* On January 12, 2019, Plaintiff submitted a second request which requested the “NERC Full Notice of Penalty version which includes the name of the registered entity” for 190 dockets.

Id. at 10. The second request was assigned the control number FOIA No. #2019-0030 by Defendant. *Id.* On August 3, 2019, Plaintiff submitted a third request which requested “NERC Notice of Penalty which includes the name of the registered entity” for 10 dockets. *Id.* at 12. The third request was assigned the control number FOIA No. #2019-0099 by Defendant. *Id.*

An NOP is a record of a violation of mandatory reliability standards and may include a decision to impose a penalty by NERC. *See* 18 CFR § 39.7(c). Penalties may be issued by NERC for violations of, *inter alia*, NERC’s CIP standards, which are a subset of mandatory reliability standards. [filed herein] Mabee Decl., ¶ 19. At the time of the filing of this judicial review, all but a single violation covered by these requests had been mitigated according to NERC’s publicly available records. [filed herein] Mabee Decl., ¶ 39. Apart from *possibly* the aforementioned single violation, there is no longer any violation within Plaintiff’s requests that may be exploited to cause danger or harm to others. [filed herein] Mabee Decl., ¶ 41.

Plaintiff originally requested the entire “non-public” version of the NOPs; Plaintiff subsequently, in an act of good faith, agreed with Defendant to accept just the cover sheet (page 1) of the public version of the NOPs, with the name of the URE and docket number at the top of each cover sheet. [filed herein] Ex.106; [filed herein] Mabee Decl., ¶ 35; [ECF No. 41-2] Kuehnle Decl., ¶ 11.

The reduction of the scope of the request lowered the potential production of records, from thousands of pages of records, to a *maximum* of 253 pages (the total number of dockets requested by Plaintiff). FERC denied Plaintiff access to nearly every record requested.

Following appropriate administrative procedure, Plaintiff appealed his requests. Plaintiff duly appealed, on April 17, 2019, Defendant's partial denial of records related to his first request. [ECF No. 1 at 9]. The appeal of FOIA No. 2019-0019 was denied on October 21, 2019. *Id.* Plaintiff appealed Defendant's lack of response within the statutory timeline of the second request on September 13, 2019. *Id.* at 11. This appeal was denied on October 25, 2019. *Id.*

On September 24, 2019, Plaintiff appealed Defendant's lack of response to his third request. *Id.* at 12. Defendant denied the appeal on November 6, 2019. *Id.*

At the filing of this judicial review, nearly a year after Plaintiff's first request and eight months after Plaintiff agreed to substantially narrow his requests, Defendant had processed only 21 of 253 dockets, and released only 8 out of 1,490 entity names covered by Plaintiff's requests. *Id.* at 13. At that rate, Defendant would have taken approximately 12 years to finish its processing of Plaintiff's requests. [filed herein] Mabee Decl., ¶ 36. FOIA requires that records be released "promptly" 5 U.S.C. § 552(a)(3)(A). Defendant failed to produce records promptly.

B. Defendant Delayed Release of Records Prior to This Court's Order.

Defendant continued to delay release of duly requested records until after the Court issued its January 28, 2020 minute order which mandated: "Defendant shall process a minimum of 10-15 dockets per month and shall issue a response to Plaintiff's FOIA requests on the 30th day of each month or the next business day if the 30th falls on a weekend or holiday, until production is complete." Between the filing of this judicial review on November 11, 2019 and the Court's January 28, 2020 order, Defendant only produced 14 dockets, releasing the name of one entity, and denying Plaintiff's request to release the other names contained in the remaining dockets. After the Court's January 28, 2020 minute order, Defendant began producing an average of 11.4 dockets per month. [filed herein] Mabee Decl., ¶ 37. Prior to this Court's January 28, 2020 minute order, 218 of the 253 dockets remained unprocessed, representing 1,454 unprocessed entities of the 1,490 total.

C. Defendant Processed Additional Dockets but Continued to Withhold Most Records.

On January 28, 2020, this Court, via minute order, ordered Defendant to "process 10-15 dockets per month." Defendant produced monthly status updates every month starting in February 2020, and finished processing dockets by January 31, 2022. [filed herein] Mabee Decl., ¶ 37. Throughout this process, FERC asserted Exemption 3 and Exemption 7(F) to deny Plaintiff access to the names of the vast majority of the electric power companies that have been found to have violated NERC rules, even though the underlying violations had been mitigated. [filed herein] Mabee Decl., ¶ 39.

D. Defendant Failed to File Its Exhibit A.

Defendant filed its Motion for Summary Judgment on May 11, 2022. [ECF No. 41].

Defendant provided no Vaughn Index, nor did Defendant provide detailed information on the various types of NOPs at issue in this case. Defendant attached and filed the declaration of Mr. Kuehnle. [ECF No. 41-2] (“Kuehnle Decl.”). The Declaration states that Exhibit A is attached. [ECF No. 41-2] Kuehnle Decl., ¶ 13. *Exhibit A was not attached.* A document purporting to be Exhibit A was provided to Plaintiff on May 19, 2022. Defendant’s counsel stated, “[p]lease note that it does not show the redactions – we decided to leave out the redactions and create a clean Exhibit.” The unfiled Exhibit A, although received by Plaintiff, was not disclosed to the Court in Defendant’s filing. Defendant filed no errata.

The unfiled Exhibit A is discussed in the following paragraph of the Kuehnle

Declaration:

13. In order to ensure a consistent framework with respect to the analyses and conclusions, I, in collaboration with OER staff, including Ms. Eade and staff from FERC’s General & Administrative Law section, developed a framework to reflect and document our analyses and conclusions. An example of a redacted copy of this documentation utilized for the Notices of Penalty and the associated UREs is attached is Exhibit A to this declaration. [ECF No. 41-2] Kuehnle Decl., ¶ 13.

However, the five factors in the unfiled Exhibit A, purported by Defendant to represent FERC’s analysis, *supra*, differ from the eight factors listed in the declaration itself. [ECF No. 41-2] Kuehnle Decl., ¶¶ 13-14. Plaintiff wishes to draw the Court’s attention to this inconsistency. Plaintiff is thus unclear as to what FERC’s actual analysis

consisted of, or how the Court is to evaluate the evidence proffered in this reference in Defendant's Declaration to an unfiled "Exhibit."

IV. FERC HAS NOT MET ITS BURDEN OF PROOF

This Court is required to conduct a *de novo* review of the record when evaluating a motion for summary judgment, and the responding Federal agency bears the burden of proving that it has complied with its obligations under the FOIA. *See* 5 U.S.C. § 552(a)(4)(B); *In Def. of Animals v. NIH*, 543 F. Supp. 2d 83, 92–93 (D.D.C. 2008). The Court must analyze all underlying facts in the light most favorable to the FOIA requester, *see Willis v. DOJ*, 581 F. Supp. 2d 57, 65 (D.D.C. 2008), and it may grant summary judgment to an agency only after the agency establishes that it has "fully discharged its [FOIA] obligations," *Moore v. Aspin*, 916 F. Supp. 32, 35 (D.D.C. 1996). *Eddington v. U.S. Dep't of Just.*, No. CV 19-1991 (FYP), 2022 WL 218562 (D.D.C. Jan. 25, 2022) at 2.

"FOIA cases typically and appropriately are decided on motions for summary judgment." *Judicial Watch, Inc. v. Dep't of Navy*, 25 F. Supp. 3d 131, 136 (D.D.C. 2014) (quoting *Def. of Wildlife v. U.S. Border Patrol*, 623 F. Supp. 2d 83, 87 (D.D.C. 2009)). *See also Eddington* 2022 WL 218562 at 2. "In FOIA cases, '[s]ummary judgment may be granted on the basis of agency affidavits' when those affidavits 'contain reasonable specificity of detail rather than merely conclusory statements,' and when 'they are not called into question by contradictory evidence in the record or by evidence of agency bad faith.'" *Judicial Watch, Inc. v. U.S. Secret Serv.*, 726 F.3d 208, 215 (D.C. Cir. 2013) (quoting *Consumer Fed'n of Am. v. Dep't of Agric.*, 455 F.3d 283, 287 (D.C. Cir. 2006)).

Under FOIA "the dominant objective [] is disclosure, and exemptions are to be narrowly construed." *John Doe Agency v. John Doe Corp.*, 493 U.S. 146, 152 (1989). *See*

also, *Keeping Gov't Beholden, Inc. v. Dep't of Just.*, No. CV 17-1569 (FYP), 2021 WL 5918627 (D.D.C. Dec. 13, 2021) at 6.

A. Defendant Failed to Produce a Vaughn Index.

FERC failed to produce a sufficient description of the documents it has withheld and the exemptions under which it has withheld those documents. Under FOIA the agency must provide a “relatively detailed analysis (of the material withheld) in manageable segments.” *Vaughn v. Rosen*, 484 F.2d 820, 826 (D.D.C. 1973). This analysis should “enable[] a District Court judge to perform a searching *de novo* review.” *Church of Scientology of Cal., Inc. v. Turner*, 662 F.2d 784, 786 (D.C. Cir. 1980).

Exemption 3 is treated slightly differently than other exemptions and a categorical application of the exemption may be more adequate. *See Goland v. CIA*, 607 F.2d 339, 350 (D.C. Cir. 1978). However, an assertion of any Exemption still requires that “detailed, scrupulous description [of withheld documents].” *Church of Scientology of Cal., Inc.*, 662 F.2d at 786.

A Vaughn Index is the typical document that “specifi[ies] in detail which portions of the document are disclosable and which are allegedly exempt.” *Vaughn*, 484 F.2d at 827. These indices allow “further examination and would be an indispensable [sic] aid to the court of appeals reviewing the district court's decision.” *Ray v. Turner*, 587 F.2d 1187, 1192 (D.C. Cir. 1978). Finally, in *Vaughn*, the Court also noted that “while it is not impossible, it seems highly unlikely that a particular element of the information sought would be exempt under [multiple] exemptions.” 484 F.2d at 828. The government here failed to provide any relatively detailed description of the documents withheld.

The government in *Vaughn* claimed that records, as a whole, were exempt under three exemptions. *Id.* In *Vaughn*, the agency submitted “an affidavit of the Director of the Bureau of Personnel Management Evaluation.” *Id.* at 823. The affidavit “did not illuminate or reveal the contents of the information sought, but rather set forth in conclusory terms the Director’s opinion that the evaluations were not subject to disclosure under the FOIA.” *Id.* The Court ultimately found that a “more adequate, or rather less conclusory, justification of the Government’s legal claims, and more specificity by separating and indexing the assuredly exempt documents themselves,” would allow a “more adequate adversary testing.” *Id.* at 828.

In *ACLU v. C.I.A.*, the government provided no formal *Vaughn* Index, and provided no declaration that provided details of the reason for withholding. 710 F.3d 422, 434 (D.C. Cir. 2013). The District Court granted Defendant’s motion for summary judgment. *Id.* at 426. The Court of Appeals subsequently concluded that the lack of specificity in *ACLU* was unable to sustain the grant of summary judgment for Defendant and the Circuit Court reversed and remanded. *Id.* at 434.

In this case, the government has done what the government did in *Vaughn*. Defendant here asserts that both Exemption 3 and Exemption 7(F) apply to the same information. [ECF No. 41-2] Kuehnle Decl., ¶ 15. This is like the government in *Vaughn* which attempted to apply multiple exemptions to the same information. 484 F.2d at 827. Further, the analysis of the application of the exemptions here is conclusory like the analysis in *Vaughn*.

Defendant here “relied on Exemption 3 (protected Critical Energy/Infrastructure Information [CEII]) . . . in denying the release of the identities” of UREs. Kuehnle Decl. ¶

25. If Exemption 3 applied to the names of UREs then a broad assertion such as that may be appropriate. However, while Defendant's declarant has conclusorily asserted that the names constitute CEII, Defendant has not produced any evidence that the names have been designated as such by the Secretary or Commission as required by 16 U.S.C. § 824o-1(a)(3).

Finally, the lack of specificity for the reason of the withholding under Exemption 7(F) here is like the lack of specificity in *ACLU* where the government broadly refused to justify its withholding under FOIA. *ACLU*, 710 F.3d 422, 434 (D.C. Cir. 2013). This broad refusal ultimately led to a reversal of summary judgment in *ACLU*, *supra*.

Like *Vaughn* and *ACLU*, Defendant's application of Exemptions 3 and 7(F) to all documents fails to survive a "detailed, scrupulous" analysis.

B. Defendant Claims That Both Exemptions Apply to All Withheld Records.

FERC alleges that both Exemption 3 and 7(F) apply to all withheld records, but offers no analysis of any name associated with any specific NOP. [ECF No. 41] Memorandum in Support of Its Motion for Summary Judgment ("Def's Mem."). Each exemption, Defendant implies, must apply to every record withheld. FERC bears that burden of proof.

In this case there is contradictory evidence that neither Exemption applies in the form of Declarations. *See* [filed herein] Mabee Decl.; [filed herein] Declaration of Joseph Weiss ("Weiss Decl."); [filed herein] Declaration of George Cotter ("Cotter Decl."); [filed herein] Declaration of Thomas Waller Jr. ("Waller Decl."); [filed herein] Declaration of Christopher Vickery ("Vickery Decl."); [filed herein] Declaration of Tyson Slocum ("Slocum Decl.").

In summation, Defendant has not met its statutory burden of proof. FERC presents no evidence that any specific record has been analyzed for any Exemption. Further, there is

“contradictory evidence” where NERC claims 98-100% success in mitigation (fixed), yet here FERC claims a reasonable expectancy of danger for mitigated actions between three and 13 years old. [filed herein] Mabee Decl., ¶¶ 39-41. FERC’s regulations at 18 CFR § 388.113(e)(1) provide that the designation of CEII “may last for up to a five-year period, unless re-designated.” There is no evidence in this record that any of the dockets that are over five years old have been “redesignated” as CEII. [filed herein] Mabee Decl., ¶ 48.

V. PLAINTIFF OFFERS SPECIFIC EXAMPLES OF RECORDS IMPROPERLY WITHHELD

Out of respect for judicial resources, rather than discuss all 1,349 of the denials in detail, Mr. Mabee below points to nine representative NOPs which illustrate the names of UREs of mitigated violations (according to FERC) – all of which fail to qualify for Exemption 3 and Exemption 7(F) protection under FOIA. Plaintiff’s conclusions are supported by several cybersecurity, infrastructure security and energy experts with more than a century of combined experience. [filed herein] Cotter Decl.; [filed herein] Weiss Decl.; [filed herein] Waller Decl.; [filed herein] Vickery Decl.; [filed herein] Slocum Decl.

A. Examples of Mitigated NOPs That Were Not Disclosed to Plaintiff.

1. Example One:

Docket NP10-160-000: On September 13, 2010, NERC filed a Spreadsheet Notice of Penalty with FERC describing two violations by a URE which resulted in no monetary penalty. The two violations were administrative in nature. NERC’s Regional Entity verified that the mitigation was complete on November 11, 2009. FERC issued a “No Further Review” letter on October 13, 2009. Yet on January 29, 2021, FERC refused to release the name of the URE associated with docket NP10-160-000 whose two minor administrative

violations have been mitigated for over 11 years. [filed herein] Ex. 113; [filed herein] Mabee Decl., ¶¶ 60-62; [filed herein] Cotter Decl., ¶¶ 11-15.

2. Example Two:

Docket NP10-135-000: On July 6, 2010, NERC filed a Notice of Penalty with FERC. There was one violation cited with an \$8,000 penalty agreed upon in a settlement agreement between the Regional Entity and the URE. The violation was mitigated prior to the NOP being filed. FERC issued a “No Further Review” letter on August 5, 2010 accepting the NOP. Yet on January 29, 2021, FERC refused to release the name of this URE whose violation had been mitigated for over 11 years. [filed herein] Ex. 114; [filed herein] Mabee Decl., ¶¶ 63-64; [filed herein] Cotter Decl., ¶¶ 16-20.

3. Example Three:

Docket NP18-7-000: On February 28, 2018, NERC filed this Notice of Penalty with FERC. The URE agreed in a settlement to pay a \$2.7 million penalty. The mitigation was completed on December 15, 2017, and FERC Issued a “No Further review” letter on May 30, 2018. Yet on February 26, 2021, Defendant denied Plaintiff’s request to disclose the name of the URE. [filed herein] Ex. 115; [filed herein] Mabee Decl., ¶¶ 65-66; [filed herein] Cotter Decl., ¶¶ 21-23; [filed herein] Weiss Decl., ¶¶ 9-10, 13-14. The cybersecurity expert who discovered the data breach in 2016 that led to this NOP was Christopher Robert Vickery. Mr. Vickery’s declaration is attached which includes his professional assessment that there would be no danger in releasing the name of the URE associated with FERC docket NP18-7-000. [filed herein] Vickery Decl. at 1-3.

4. Example Four:

Docket NP18-14-000: On May 31, 2018, NERC filed an NOP with FERC. The NOP covered 22 violations of the NERC CIP Reliability Standards. According to NERC, the mitigation was completed by October 31, 2017, and the Regional Entity (ReliabilityFirst) verified that all mitigation actions were completed. Each violation has the entry: “URE certified, and ReliabilityFirst verified, that all mitigation actions were completed.” The URE entered a settlement agreement and agreed to pay \$180,000. FERC issued a “No Further Review” letter on June 29, 2018. On February 26, 2021, FERC denied Plaintiff’s request to disclose the name of the URE over three years after the violations had been mitigated. [filed herein] Ex. 116; [filed herein] Mabee Decl., ¶ 67; [filed herein] Cotter Decl., ¶¶ 24-28.

B. Examples of NOPs Denied to Plaintiff Here, but Disclosed to the Public at Other Times.

Contrary to FERC’s approach, Plaintiff has, with the information currently available to him, pointed to several URE names denied him that were disclosed to others. [filed herein] Mabee Decl. ¶¶ 49-55. These proffered representative cases offer detail and analysis from actual cases, unlike the hypothetical blanket approach tendered by FERC.

Here, FERC improperly and illegally used Exemptions 3 and 7(F) when it refused to release 1,349 URE names associated with Plaintiff’s requests, including the following six dockets: NP11-59-000, denied on March 30, 2020; NP11-128-000, denied on April 28, 2020; NP11-137-000, denied on May 27, 2020; NP12-20-000, denied on November 25, 2020; NP11-1-000, denied on January 20, 2021; NP18-7-000, denied on February 26, 2021. [filed herein] Plaintiff’s Statement of Facts and Response to Defendant’s Statement of Facts ¶¶ 41-49; [filed herein] Mabee Decl., ¶ 49.

FERC had previously released each of the names contained in the six NOPs, *supra*, to the public. However, FERC refused to release the very same names in response to Mr. Mabee's requests. *Id.* ¶ 49. FERC's inconsistent treatment of the same information in other requests underscores its illegal and inconsistent application of Exemptions 3 and 7(F).

VI. FERCs EXEMPTION 3 ANALYSIS FAILS

A. Exemption 3 Standard.

The Court of Appeals for the District of Columbia Circuit has held that records may be withheld under the authority of another statute pursuant to Exemption 3 "if -- and only if -- that statute meets the requirements of Exemption 3, including the threshold requirement that it specifically exempt matters from disclosure." *Reporters Comm. for Freedom of the Press v. Department of Justice*, 816 F.2d 730 (D.C. Cir. 1987), *modified on other grounds*, 831 F.2d 1124 (D.C. Cir. 1987), *rev'd on other grounds*, 489 U.S. 749 (1989).

It is difficult to meet the standard of Exemption 3 as the Federal Court of Claims held that 18 C.F.R. § 388.113 [the Nuclear Regulatory Commission (NRC) rule concerning nuclear power plants] does not apply to Mr. Seymore's testimony concerning the general location of AmerGen's nuclear fuel pools..." *United AmerGen Energy Co. LLC by and through Exelon Generation Co., LLC v United States*, 115 Fed. Cl. 132, 146-147 (2014).

B. The FAST Act Explained.

The Fixing America's Surface Transportation Act ("FAST Act") was passed by Congress and signed into law on December 4, 2015. 16 U.S.C. § 824o-1. The Act defines Critical Electric Infrastructure Information (CEII) as "information related to critical electric infrastructure, or proposed critical electrical infrastructure, generated by or provided to the

Commission [FERC] or other Federal agency, other than classified national security information, that is designated as critical electric infrastructure information by the Commission or the Secretary [of Energy] pursuant to subsection (d). Such term includes information that qualifies as critical energy infrastructure information under the Commission's regulations.” *Id.* at (a)(3).

Defendant argues that all the withheld URE names are CEII, thus exempt from disclosure, pursuant to 5 U.S.C. § 552(b)(3). FERC alleges that all the names are CEII without providing evidence that any names have ever been designated CEII.

Defendant has made no showing nor has it provided any documentation that the name of a violator has been designated as CEII. In fact, as described below, the opposite is true, according to FERC’s own orders and regulations. Under the statute, names of UREs are not CEII and therefore are not exempt under the FAST Act.

C. FERC’s Regulation Implementing the FAST Act.

FERC asserts that their internal analysis should apply to Exemption 3. Plaintiff rejects Defendant’s argument as the proper analysis here is found in 18 C.F.R. § 388.113. Subsection (c)(1) of 18 C.F.R. § 388.113 defines CEII as information... “that is designated as critical electric infrastructure information by the Commission . . .” 18 C.F.R. § 388.113(c). Again, there has neither been such designation of the name of an electric power company as CEII, nor does the name meet the definition of CEII by regulation.

Subsection (c)(2) of 18 C.F.R. § 388.113 further defines CEII as “specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that (i) relates details about the production, generation, transportation,

transmission, or distribution of energy; (ii) could be useful to a person in planning an attack on critical infrastructure . . .” 18 C.F.R. § 388.113 (c)(2).

FERC has explained that “section 388.113 pertaining to CEII documents is crafted to strike a balance between preventing the risk of harm if sensitive materials are disclosed to bad actors and allowing parties to fully participate in Commission proceedings.” *NEXUS Gas Transmission, LLC Texas E. Transmission, LP DTE Gas Co. Vector Pipeline L.P.*, 164 FERC ¶ 61,054 (2018) at 4. *See also Myersville Citizens for a Rural Cmty., Inc. v. FERC*, 783 F.3d 1301, 1327 (D.C. Cir. 2015); *Odland v. FERC*, 34 F. Supp. 3d 3, 11 (D.D.C. 2014).

The totality of the factors do not converge as required by the word “and” in the listing of CEII factors which is required to withhold the name of a violator.

The most critical portion of the CEII factors is stated at the outset, “specific engineering, vulnerability or detailed design information.” A publicly available entity name is not one of those criteria. FERC’s eight factor analysis, designed for this request, did not follow the CEII definition. The common sense analysis is to look to the underlying statute in deciding whether to apply Exemption 3. Names of code violators, civil and criminal defendants and the like are generally publicly available, absent facts very different from what we have here.

Plaintiff agrees that FERC should not disclose CEII which must be “specific engineering, vulnerability, or detailed design information.” FERC cannot, however, form an artificial nexus to violator names by claiming that its own disclosure of some details of the violations is, together with the entity names, CEII. Such an analysis is not based on the statutory CEII factors. FERC has not provided any evidence that the names of UREs are actually CEII.

Here, Mr. Mabee is not seeking any specific design or detailed plans secreted by FERC, NERC, or UREs. The remainder of the CEII definition does not apply to the facts pertinent to Plaintiff's requests. FERC does not point to any names of any companies that have been designated as CEII by FERC or by the Secretary of Energy. 18 C.F.R. § 388.113 (1).

As cybersecurity expert Joseph Wiess points out "[t]he information which NERC asserts is CEII, such as the name of the CIP violator in docket No. NP-18-7-000, the PG&E case discussed...above, often is not actually CEII. Assuming the utility has mitigated their CIP violations, identifying the utility by name does not constitute CEII nor can it be reasonably expected to endanger any individual or property." [filed herein] Weiss Decl., ¶ 14.

FERC's own regulations require the disclosure of the name of the violator at the time an NOP is filed with the Commission. 18 CFR § 39.7(b)(4) states that "[e]ach violation or alleged violation shall be treated as nonpublic *until the matter is filed with the Commission as a notice of penalty* or resolved by an admission that the user, owner or operator of the Bulk-Power System violated a Reliability Standard or by a settlement or other negotiated disposition." (emphasis added).

Moreover, in accordance with 18 CFR § 39.7(d)(1), the notice of penalty must include "[t]he name of the entity on whom the penalty is imposed." Therefore, when NERC filed the 253 NOPs subject to this judicial review, the names of the entities should have been disclosed publicly. The Federal regulations are very clear that the name of the entity on whom the NERC penalty is imposed must be disclosed.

To summarize, the proper CEII analysis, as opposed to the FERC factors utilized by Defendant:

- A. The names of violators are not specific engineering, vulnerability or detailed design information.
- B. The names are not useful to bad actors, as all of these entities are presumably public companies.
- C. The names do not give strategic information beyond the location of infrastructure. In fact, if the location were disclosed, which this statute allows, the name of the entity would be discernible. As some entities operate across multiple geographic entities including States, disclosing the location would provide more information than the mere disclosure of the name of the violator. Plaintiff is seeking less than what CEII would allow, even if the other factors were applicable, which is not the case.

“FERC might claim that the name of the company ‘could be useful to a person planning an attack on critical infrastructure,’ but this argument is null and void because the offending utilities have already mitigated the vulnerabilities which caused the enforcement actions in the first place.” [filed herein] Waller Decl. ¶ 10. Mr. Waller “further conclude[d] that releasing the names of these regulatory violators will not be a breach of CEII, nor will it pose any threat to any person.” [filed herein] Waller Decl. ¶ 30.

Finally, FERC argues that the name of every withheld, mitigated regulatory violator in *every* NOP is CEII. This argument directly contradicts FERC’s own regulation which states that the general location of the critical infrastructure, or simply the name of the

facility, is not CEII. 81 Fed. Reg. 245 ¶ 24 (quoting 18 C.F. R. § 388.113 (c)(1)(iv)).

Plaintiff's request for records is not seeking even the name of a facility (which is generally not CEII) but instead seeks the name of the URE that owns the facility.

To quote FERC, “[u]nder certain circumstances, information regarding the location of infrastructure or its name that is not already publicly known could be CEII. Therefore, we [FERC] clarify that, while as a general matter the location or name of infrastructure is not CEII, a submitter [i.e., URE, utility company] of information to the Commission may ask that non-public information about the location, or the name, of critical infrastructure be treated as CEII. The submitter would have to provide a justification for the request and explain why the information is not already publicly known.” 81 Fed. Reg. 245 ¶ 24. Defendant has provided no evidence that any submitter provided such “justification.”

VII. DEFENDANT'S CLAIM OF EXEMPTION 7(F) FAILS

5 U.S.C. § 552(b)(7) exempts from disclosure “records or information compiled for law enforcement purposes, but only to the extent that the production of such law enforcement records or information...(F) could reasonably be expected to endanger the life or physical safety of any individual....” In a judicial review of a request, the burden of persuasion is on the government agency, and doubts are to be resolved in favor of disclosure. *Id.* 5 U.S.C. § 552.

“[FOIA] should be administered with a clear presumption: In the face of doubt, openness prevails,” *Jud. Watch, Inc. v. U.S. Dep't of State*, 344 F. Supp. 3d 77, 78 (D.D.C. 2018), citing Presidential Memorandum for Heads of Executive Departments and Agencies Concerning the Freedom of Information Act, 74 Fed. Reg. 4683 (Jan. 21, 2009).

A core purpose of FOIA, as articulated by the Supreme Court in dealing with a FOIA privacy exemption, is “(W)hether disclosure of a private document is ‘warranted’ within the meaning of the exemption turns upon the nature of the requested document and its relationship to the FOIA's central purpose of exposing to public scrutiny official information that sheds light on an agency's performance of its statutory duties, rather than upon the particular purpose for which the document is requested or the identity of the requesting party.” *U.S. Dep't of Just. v. Reps. Comm. For Freedom of Press*, 489 U.S. 749, 750 (1989).

A. Releasing just the name of a utility, subject to a notice of penalty, cannot be expected to result in the endangerment of the life or physical safety of any individual.

If a gate was unlocked, but now is locked, how does disclosing the owner of the gate provide useful information to a person planning an attack? What is being protected here is not the public, it is the entities which have violated the rules. [filed herein] Slocum Decl., ¶ 8. Mitigation, by NERC rules which FERC approves in finding no further review is warranted, resolves the danger after mitigation.

If a gate was unlocked, but no longer is, what additional danger exists by disclosing the name of the URE that owns the formerly unlocked gate. Now the bad actor knows that the gate was improperly left open for a period of time, but the situation has since been fixed.

FERC alleges that, having told the public that some gates have been unlocked, to later reveal the URE that owns the gate creates a danger. It does not. The dangerous condition was fixed at mitigation.

Here, Defendant argues that “publicly disclosing the names of entities violating NERC Reliability Standards, pertaining to cybersecurity, increases the risk of cyberattack by linking vulnerabilities to specific electric utility companies. [ECF No. 41] Def’s Mem. at 22.

URE names, which are public, have no nexus to any potential danger once the violation has been mitigated.

Tyson Slocum, Director of Public Citizen’s Energy Program, declared “[r]eleasing just the name of a utility subject to a notice of penalty cannot be expected to result in the endangerment of the life or physical safety of any individual. Releasing just the name of the utility will not compromise the utility’s operations, or recklessly expose any sensitive information. In fact, publicly identifying the names of utilities subject to NOP violations can help improve and strengthen cybersecurity standards – thereby helping consumers and keeping our electricity system more secure.” [filed herein] Slocum Decl., ¶ 6.

The Center for Security Policy’s Infrastructure security expert, Thomas Waller Jr., concludes that Defendant’s use of Exemption 7(F) is inappropriate here. [filed herein] Waller Decl., ¶ 12. He draws upon his experience as a Lieutenant Colonel in the United States Marine Corps and as a commander of an elite unit to provide the Court with a real-world example of the *proper* use of Exemption 7(F) to protect a sailor under his charge. *Id.*

Defendant’s reliance on *Public Employees for Environmental Responsibility (PEER) v. United States Section, International Boundary & Water Commission, U.S.-Mexico* does not justify withholding records under Exemption 7(F) in this case. 740 F.3d 195 (D.C. Cir. 2014); [ECF No. 41] Def’s Mem. at 21. The facts in the case at bar are different from the facts that were properly reviewed in *PEER*. Plaintiff is drawing a factual distinctual analysis, and not a change in the interpretation of *PEER*.

The plaintiff in *PEER* was seeking the disclosure of records related to the emergency action plans and inundation maps of two dams located on the border between the United States and Mexico. *Id.*

The United States Court of Appeals for the District of Columbia Circuit held that the *ongoing* emergency action plans (which also included inundation maps) were compiled to enforce statutory duties to establish programs and policies to enhance *ongoing* dam safety for protection of human life and property, and thus met the Exemption 7 threshold. (emphasis added). *Id* at 203-04 [ECF No. 41] Def’s Mem. at 21.

Plaintiff, in this case, is not asking for maps, schematics or emergency action plans of any kind. Plaintiff is only requesting the names of electric power companies (UREs) which were issued NOPs, from three to 13 years ago. The violations for which these NOPs were issued have already been mitigated according to FERC. The rate-payers, shareholders and taxpayers involved with these UREs are among those for whom FOIA was enacted.

Plaintiff asserts, and the facts compel, when reviewed *de novo* this Court should conclude that disclosing the names of UREs does not violate Exemption 7(F). These companies have: 1) violated NERC Reliability Standards, 2) been issued NOPs by NERC in its quasi-governmental capacity under the Federal Power Act (all mitigated), and 3) been informed that there will be no further action. This is not the same as *PEER*’s on-going emergency action plans (which include the inundation maps) produced to model flooding after potential dam breaches.

No other Federal civil enforcement agency has tried to hide behind Exemption 7(F) in this manner. [filed herein] Mabee Decl., ¶¶68, 69; [filed herein] Waller Decl., ¶ 30. Defendant further argues that “Such information [similar to what the Plaintiff is asking for], gathered over time, could render entities vulnerable on the basis of future cybersecurity shortfalls connected with these same transmission control rooms.” [ECF No. 41] Def’s Mem. at 22.

Plaintiff is not seeking any information connected to cybersecurity or transmission control rooms. Plaintiff is asking only for disclosure of the names of the UREs who were issued NOPs, for violations which were mitigated (i.e., fixed, completed, done), over three years ago.

Defendant argues that “simply because mitigation has been completed does not mean that the vulnerability has been addressed and it make [sic] take time to truly assess whether an entity’s efforts to address the relevant threat or issue were successful.” [ECF No. 41] Def’s Mem. at 22.

Defendant offers no evidence to support its conclusion, which is at odds with the assurances provided by NERC and accepted by FERC that the offending utilities have mitigated the dangers associated with the violations that caused enforcement actions. Either the vulnerabilities were mitigated and the regulators (NERC, overseen by FERC) are confirming so, or the utilities have *not* taken necessary protective measures to address the relevant threat or issue that they stated they had. If the latter is the case, NERC and FERC grossly misrepresent the status of the mitigation of these violations to the public, Congress, ratepayers and shareholders.

Defendant's attempt to make this double-standard argument to prevent transparency surrounding regulatory violations is the type of government secrecy FOIA was enacted to prevent. Defendant would shroud for time immemorial the requested records. This government behavior goes against the spirit and purpose of FOIA. The Supreme Court has “repeatedly [] stressed [that] the fundamental principle of public access to Government documents” lies at the heart of FOIA. *John Doe Agency* 493 U.S. at 150. The purpose of this

principle is so that the public knows “what their government is up to.” *Dep’t of Justice v. Reporters Comm. for Freedom of the Press*, 489 U.S. 749, 773 (1989).

As mentioned, *supra*, the pertinent UREs have mitigated the violations for which the NOPs were issued eliminating any danger that would legally validate an exercise of Exemption 7(F).

Notably, in 252 of the 253 dockets in this judicial review, the violations were verified as mitigated by the regulator (NERC) before NERC submitted the NOP to FERC. [filed herein] Mabee Decl., ¶ 39. Therefore, no danger exists in releasing the names of the violators in these dockets. Disclosing the specific URE that committed and mitigated a violation could not be “reasonably expected to endanger the life or physical safety of any individual.”

NERC’s own rules state that mitigation means that these vulnerabilities have been addressed. Specifically, Appendix 2 to NERC’s Rules of Procedures defines mitigating activities and mitigation plan as follows:

“Mitigating Activities” means actions taken by a Registered Entity to correct and prevent recurrence of a noncompliance, whether or not the actions are embodied in a Mitigation Plan.

“Mitigation Plan” means an action plan developed by the Registered Entity to (1) correct a violation of a Reliability Standard and (2) prevent re-occurrence of the violation.

See NERC, *Definitions Used in the Rules of Procedure*, page 14, effective Jan. 19, 2021, https://www.nerc.com/AboutNERC/RulesOfProcedure/Appendix_2_ROP_Definitions_20210119.pdf.

NERC again answers the question “What is a Mitigation Plan and Mitigating Activities?” in a User Guide:

A Mitigation Plan is a formal action plan developed by a registered entity to (1) correct a noncompliance with a Reliability Standard, (2) address the causes of the noncompliance, and (3) reasonably prevent recurrence of the noncompliance. A registered entity may cover multiple instances of the same Standard and Requirement in one Mitigation Plan. However, for cases where an issue causes multiple noncompliance of multiple Standards and/or Requirements, a registered entity should create a separate Mitigation Plan for each Requirement with the information relevant only to that Requirement. The Mitigation Plan is subject to the formal review and acceptance process as described in Section 6.0 of Appendix 4C of the NERC Rules of Procedure.

Mitigating activities are sets of tasks developed by a registered entity to (1) correct a noncompliance with a Reliability Standard and/or Requirement, (2) address the cause of the noncompliance, and (3) of the noncompliance [sic]. In CITS and CDMS, registered entities typically submit mitigating activities as part of the reporting process when they have already completed them or will complete them in less than 12 months.

See, Registered Entity Self-Report and Mitigation Plan User Guide, Page 16, January

4, 2021, available at

<https://www.nerc.com/pa/comp/CE/Enforcement%20Actions%20DL/Registered%20Entity%20Self-Report%20and%20Mitigation%20Plan.pdf>.

Plaintiff has verified that, according to NERC's own publicly available documents, the entities which were involved in these NOPs have completed their mitigation plans and activities, and this was verified by the regulator, in 252 of 253 dockets. In the one docket, it is unknown whether mitigation is complete because NERC stopped disclosing the mitigation status to the public. [filed herein] Mabee Decl. ¶ 42.

A representative example is evidenced by NERC's statement in Exhibit 116 [filed herein] where NERC informs FERC that "URE certified that it had completed its Mitigation Plan, and [Western Electricity Coordinating Council] verified that URE had completed all mitigation activities" for each violation in the NOP. This phrase is highlighted 21 times for

the Court's convenience in the Exhibit 116. Further, it is FERC that has the burden to prove the exemptions it invokes.

Substantial evidence shows that no danger exists. NERC's own annual report cites a 98% mitigation rate in February, 2022. [filed herein] Mabee Decl., ¶ 31.

Additionally, other Federal agencies regularly name entities violating rules including the Nuclear Regulatory Commission (NRC) ([filed herein] Mabee Decl., ¶ 31; [filed herein] Waller Decl., ¶¶ 14-16) the Department of Transportation (DOT) [filed herein] Waller Decl., ¶¶ 17-24), the Federal Communications Commission (FCC) [filed herein] Waller Decl., ¶¶ 25-29).

To compare Defendant's present actions with other Federal regulators, the Court should review three excerpts from the Waller's declaration. Thomas Waller Jr. is a U.S. Marine Corps Lieutenant Colonel, Director of Infrastructure Security at the non-profit Center for Security Policy, and an expert with substantial experience with FERC. He states: "One can also compare FERC with the Department of Transportation (DOT) regarding pipeline security and pipeline safety. DOT maintains the Pipeline and Hazardous Materials Safety Administration (PHMSA) whose mission is 'to protect people and the environment by advancing the safe transportation of energy and other hazardous materials that are essential to our daily lives.'" [filed herein] Waller Decl., ¶ 17. Akin to FERC's responsibilities, PHMSA "sets and enforces standards, educates, and conducts research to prevent incidents." *Id.* According to Lieutenant Colonel Waller:

I have personally conducted a thorough review of the PHMSA enforcement database to compare its disclosure methodology with that of FERC. This review demonstrated that PHMSA undergoes a wide range of enforcement types and some are very similar to that of FERC. For example, one enforcement type is a "Corrective Action Order." According to PHMSA, it "may issue a Corrective Action Order if it determines that a particular pipeline represents a serious hazard to life, property, or the environment."

PHMSA Corrective Action Orders are described 49 CFR 190.233 and “usually address urgent situations arising out of an accident, spill, or other significant, immediate, or imminent safety or environmental concern.” This description of the enforcement action is very similar to the type of justification used by FERC to invoke Exemption 7(F) to conceal the identity of utilities violating NERC CIPs, yet PHMSA has no problem identifying the names of companies that are issued Corrective Action Orders.

[filed herein] Waller Decl., ¶ 20.

Colonel Waller concluded “during my review of PHMSA’s enforcement database I confirmed that since 2002, PHMSA has initiated and closed a total of 4,395 cases and has publicly disclosed the identity of the company involved, every single time.” *Id.* ¶ 24.

Lieutenant Colonel Waller makes it clear that the responsibilities and enforcement actions of DOT and FERC are very similar but their transparency practices are radically different. Plaintiff’s three requests, as amended, must be honored. Lieutenant Colonel Waller’s expert opinion is shared by many other experts. Disclosure makes an industry, whether pipeline or electric power, much more vigilant about safety and security.

Furthermore, Mr. Mabee has been denied records in this case where similar records were released in other cases, *supra*. [filed herein] Mabee Decl., ¶¶ 49-55.

FERC’s assertion of potential future danger as a result of past mitigated violations concerning names associated with two specific NOPs in this judicial review are rebutted by FERC’s own public disclosure of the very same information sought, and denied, in Plaintiff’s requests. In both cases, these NOPs were denied to Plaintiff but *were* disclosed by FERC in its public docket library. In these two cases, the entity sought to recover the cost of the NERC NOP penalties by charging them to their ratepayers. [filed herein] Mabee Decl., ¶¶ 53-54. The evident “danger” was apparently outweighed by the UREs need to recoup a financial gain.

NERC's Compliance Monitoring and Enforcement Program and Organization Registration and Certification Program Annual Report, February 9, 2022, *supra*, described the present mitigation status as follows: "Mitigation Completion Status For all REs (Registered Entities), 100 percent of mitigation for noncompliance discovered in 2015 or before has been reported as complete. Registered entities have made significant progress in mitigating older noncompliance from 2016-2018, with nearly 98.3 percent or more of noncompliance discovered in those years having been mitigated." [filed herein] Mabee Decl., ¶ 31.

In this case, FERC has disclosed 141 out of 1,490 of the URE names sought, a 9% rate. [filed herein] Mabee Decl. ¶ 38.

The inundation map and *ongoing* emergency plan cases cited by FERC, *Living Rivers, Inc. v. U.S. Bureau of Reclamation*, 272 F. Supp. 2d 1313, 1321-22 (D. Utah 2003), and *PEER*, 740 F.3d, are fundamentally factually different from this case. [ECF No. 41] Def's Mem. at 21.

The disclosure of the names of the companies by FERC have no nexus to any potential danger once the violation has been mitigated. The dam cases both involve potential flood events which concern existing conditions not subject to mitigation, and have nothing to do with the names of the entities controlling the facilities. In fact, the names of the dams were included in both cases.

Defendant stated, in its Motion for Summary Judgment, that this case is similar to *Living Rivers, Inc.*, 272 F. Supp. 2d 1313 (D. Utah 2003). [ECF No. 41] Def's Mem. Defendant, however, does not meet its burden of proof by pointing this Court to *Living*

Rivers because the facts are fundamentally different in the case at bar from the facts in *Living Rivers*, 272 F. Supp. 2d 1313 (D. Utah 2003).

The records sought in *Living Rivers, Inc.*, were “inundation maps,” produced to model potential flooding after dam breaches. *Living Rivers, Inc.*, 272 F. Supp. 2d 1313 (D. Utah 2003). This flooding, if occurred, would reasonably pose a risk of danger to the lives of individuals living in downstream areas below the dam. *Id.*

The Court in *Living Rivers, Inc.*, held that records created to protect dams from terrorism satisfy Exemptions 7's threshold, and reasoned that “the context in which an agency has currently compiled a document . . . determines whether it is ‘compiled for law enforcement purposes.’” *Living Rivers, Inc.*, 272 F. Supp. at 1319 (D. Utah 2003) (quoting *John Doe Agency*, 493 U.S. 146, 153-54 (1989)).

Plaintiff’s narrowed request, made in good faith, was only for the cover sheet of the public version of the NOPs, nearly all of which have been mitigated according to FERC, and each of which is a minimum of three years old, with the name of the URE and docket number at the top of each cover sheet. [filed herein] Ex.106; [filed herein] Mabee Decl., ¶ 35; [ECF No. 41-2] Kuehnle Decl., ¶ 11. [filed herein] Ex.106.

Living Rivers, Inc., involved a present and ongoing danger, derived from the knowledge of the level of flooding and destruction that would be caused in the event of an attack on the dam. 272 F. Supp. 2d 1313 (D. Utah 2003). In this case, the violations (which Defendant argues creates the same present and ongoing danger) have already been mitigated according to both NERC and FERC.

Furthermore, the name of a violator does not provide sufficient additional detail as to be expected to pose a danger to the lives or safety of others. [filed herein] Slocum Decl., ¶ 6;

[filed herein] Weiss Decl., ¶ 6. Rather than deal with the specifics of Plaintiff's requests by presenting evidence and potentially meeting its burden of proof, FERC offers a *Living Rivers, Inc.* defense about dangerous, unmitigated conditions that is inapplicable to this case.

Defendant's argument is that disclosing "inundation maps," which were produced to model flooding after dam breaches, mirrors the records requested by Plaintiff. This argument fails as nearly all of the NOPs in the requested records have been mitigated according to FERC. [filed herein] Ex.106; [filed herein] Mabee Decl., ¶ 35; [ECF No. 41-2] Kuehnle Decl., ¶ 11. Plaintiff's narrowed requests were not for anything similar to *ongoing* emergency plans which were part of the *PEER* facts.

Plaintiff asserts, and urges the Court to conclude, that the aforementioned records, *ongoing* emergency action plans in *PEER, supra*, and the requested records here (the cover sheet of the public version of the NOPs) are not legally equivalent and thus the records in this case should be produced by Defendant.

B. The Court cannot determine based on the existing record whether Defendant's reliance on FOIA Exemption 7(F) is proper.

In a FOIA case, filed by a plaintiff who was the accused in a law enforcement investigation, "neither the FBI nor the [Organized Crime Drug Enforcement Task Forces] demonstrated that the withholding of information under FOIA Exemption 7(F) was appropriate." *Gamboa v. Exec. Off. for United States Att'ys*, 65 F. Supp. 3d 157, 171 (D.D.C. 2014).

In *Gamboa*, the FBI stated that it was reasonable to expect that the release of identifying information would place the individual, who was the subject of the information, or their family, at great risk. *Id.* The United States District Court for the District of Columbia

ruled that the FBI's "conclusory statement alone" did not "justify withholding information under FOIA Exemption 7(F)." *Id.*

In *Petrucelli v. Dep't Of Just.*, the Defendant justified its withholding under 7(F) by saying in its declaration that the records sought "explained in detail [the plaintiff's] conviction for murder in aid of racketeering and imposition of a life sentence." 51 F. Supp. 3d 142, 172 (D.D.C. 2014). In that case, the District Court held it "cannot determine *based on the existing record* whether the [Executive Office for United States Attorneys]'s reliance on FOIA Exemption 7(F) is proper." *Id.* at 172-173 (emphasis added). If declaring that records detailing a murder conviction were not enough in *Petrucelli*, the existing record here is not enough information for the Court to determine whether FERC's reliance on Exemption 7(F) is proper.

Defendant stated that the "harm associated with an attack on a particular critical infrastructure asset would include, among others, those undergoing treatment at hospitals; first responders and those whom they serve; and even those simply relying upon traffic control in their daily commute." [ECF No. 41] Def's Mem. at 21.

Plaintiff draws the Court's attention to the lack of evidence provided by FERC concerning any of the particulars that would justify Exemption 7(F). FOIA is "broadly conceived to reflect a general philosophy of full agency disclosure, and its exemptions are exclusive, and must be narrowly construed." *FLRA v. U.S. Dep't of Veterans Affairs*, 958 F.2d 503, 508 (2d Cir.1992) (internal quotation marks omitted). Further, FOIA's purpose is to encourage public disclosure of information in the possession of Federal agencies so that the people may know what their government is up to. *Id.*

FERC has the burden of proving that the release of a record “could reasonably be expected to endanger the life or physical safety of an individual.” § 552(b)(7)(F). As mitigation is critical to the conclusion of the Court in this case, FERC has clearly not met its burden to justify nondisclosure, as any violation that has been mitigated for a minimum of three years would not constitute a danger, absent some evidence to the contrary. FERC did not provide any evidence to the contrary, rendering their invocation of Exemption 7(F) invalid under the facts of this case.

Further, FERC does not explain the alleged danger to the life or physical safety of any individual from specific URE names. Additionally, FERC does not cite the statutory language of 5 U.S.C. § 552(b)(7) in its discussion of how it evaluated Mr. Mabee’s requests. [ECF No. 41-2] Kuehnle Decl., ¶ 14.

Defendant asserts at page 2 of its Memorandum that it used the following eight analytical factors in reaching its conclusion that Exemption 3 and Exemption 7(F) apply to Mr. Mabee’s requests that the names of violators be disclosed:

1. The nature of the information contained in the publicly available version of the Notice of Penalty;
2. The nature of the Reliability Standard violation, including whether there is a Technical Feasibility exception that does not allow an entity to fully meet CIP standards;
3. Whether vendor-related information is contained in the (NOP);
4. Whether mitigation is complete;
5. The extent to which disclosure of the identity of the entity and other information would be useful to someone seeking to cause harm (presumably the “other information” is publicly available);
6. Whether a successful audit has occurred since the violation(s);
7. Whether the violation(s) was administrative or technical in nature;
8. The length of time that has elapsed since the filing of the public (NOP).

[ECF No. 41] Def’s Mem. at 7.

Declarant for FERC, Mr. Kuehnle, stated that disclosure of entity names “could reasonably endanger the life or safety of others.” [ECF No. 41-2] Kuehnle Decl., ¶ 17. This statement, apart from being conclusory, covers numerous violation scenarios and contains no relevant analysis of the specific records requested. Mr. Kuehnle stated that “based on the application of the factors . . . and relying upon my experience . . . a conclusion and recommendation was made as to whether to disclose the identity of each URE.” [ECF No. 41-2] Kuehnle Decl., ¶ 15. This represents the lack of depth in FERC’s analysis applied to 1,490 NOPs on 253 dockets. Thus, Defendant fails to meet its burden of establishing a justification for its withholdings.

NERC’s own data, in its February, 2022 Annual Report, *supra*, demonstrates FERC cannot effectively argue generalities as to a large number of cases, each one of which has a specific history. Plaintiff has provided four specific examples, *supra*, of types of cases for the Court’s consideration that underscores FERC’s inconsistent application of Exemption 7(F).

Plaintiff has provided substantial “contradictory evidence” concerning the treatment of requests, and suspect data, all of which *Judicial Watch* points to as reasons not to grant Defendant’s summary judgment motion. 726 F.3d 208.

Defendant has hypothesized a four digit password violation. FERC has not stated that this is an actual issue in any NOP in this case. Rather than putting forth hypothetical examples as justification for withholding actual names of violators for actual NOPs between three and 13 years old, Defendant should have shown the Court actual evidence of a dangerous, unmitigated violation. FERC has not.

NERC claims over 98% of the CIP violations have been mitigated. FERC could have segregated the two percent of violator names that pertain to unmitigated CIP violations, and produced the remainder. Defendant declined to do so. FERC should not be given the benefit of the doubt as to any on-going assertion of danger where a mitigation occurred years ago.

Rather than deal with the specifics of Mr. Mabee's requests by presenting actual evidence, Defendant offers a hypothetical within FERC, and an instance outside of FERC (PHMSA). It points to this hypothetical and PHMSA instance as examples of how danger would exist if detailed data about dangerous, unmitigated conditions were disclosed. [ECF No. 41] Def's Mem. In fact, Defendant's reliance on PHMSA is undercut by PHMSA's own practice of routinely sharing every violator's name. PHMSA, *Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order*, CPF 3-2022-026-NOPV, May 5, 2022 (Naming the alleged violator, Colonial Pipeline Company, and proposing a civil penalty of \$986,400 for control room management failures); [filed herein] Waller Decl., ¶ 24. Even if the FERC hypothetical were an issue within the withheld documents, given that the age of these NOPs is between three and 13 years old, FERC does not meet its burden on the hypothetical password issue.

C. This Court Should Compare FERC's Withholding to Other Federal Agencies Which Apply Exemption 7(F) Correctly.

This case is about releasing the names of violators where the government argues that the mitigated condition might cause the name to create a danger. The subject matter of these records is in the arena of electric power. The NRC in its enforcement proceedings names violators in conjunction with much more technical information than presented in FERC's NOPs. [filed herein] Mabee Decl., Exs. 117-118; [filed herein] Waller Decl., ¶¶ 14-17. For

example, the NRC violation shown in Exhibit 117 concerns a physical security violation at a nuclear generating plant.

The NRC published the name of the violator. However, physical security is one of the CIP standards in which NERC and FERC have hidden the names of the violators, specifically the entries for CIP-014-2, which is the physical security CIP standard. FERC has denied releasing the name of the violator in dockets NP17-29-000, NP18-14-000, and NP19-4-000 which were violations of, *inter alia*, CIP-014-2. [filed herein] Ex. 102.

The Court should view FERC's actions and disclosure in the context of Notices of Violation. [filed herein] Ex. 117. Lieutenant Colonel Waller compared the FERC disclosure of a physical security violation with that of an NRC alleged physical security violation. [filed herein] Waller Decl. ¶ 14.

Lieutenant Colonel Waller reviewed Mr. Mabee's Exhibits 116 and 117. In Exhibit 116 [NP18-14-000 NOP], NERC documented a violation of CIP-006-3c [Physical Security of Critical Cyber Assets] whereby the "URE failed to document, implement, and maintain a physical security plan as required by CIP-006-3c R1. Specifically, during a routine inspection URE discovered that an air conditioning unit was an exploitable access point into an identified PSP (Physical Security Perimeter)."

In a different, perhaps more severe, case in the same NOP, the URE "failed to document and implement the technical and procedural controls for monitoring physical access at all access points to the PSPs 24 hours a day, seven days a week. Specifically, the power supply to a security rack was shut off during maintenance work at one of URE's facilities, and for six days afterwards the facility was not communicating with URE's

headquarters.” [filed herein] Waller Decl. ¶ 14. These examples demonstrate that the requests here are not simply for cybersecurity information, but also physical security.

Another regulatory agency that provides thorough information to the public is the PHMSA. [filed herein] Waller Decl., ¶ 18. “Like FERC’s responsibilities, PHMSA ‘sets and enforces standards, educates, and conducts research to prevent incidents.’” [filed herein] Waller Decl., ¶ 17. Plaintiff argues that it is difficult to find any other civil enforcement agency that, upon a finding of a violation and mitigation of the violation, does not routinely make public the name of the violator. FERC’s illegal conduct in attempting to shield its regulated entities is not justified. This is particularly true where FERC’s own rules and data make clear that mitigation must, in fact, have been completed in whole or in large part.

Neither should FERC’s conduct of disclosing data and then saying that enforcement actions cannot identify violators, be allowed to serve as a model and to spread to other Federal agencies. PHMSA, discussed in Defendant’s declaration, identifies even alleged violators with names, alleged violations, and proposed civil penalties. *See supra*, Colonial Pipeline order.

“FOIA’s central purpose [is] [] exposing to public scrutiny official information that sheds light on an agency’s performance of its statutory duties...” *Reporters Comm. for Freedom of Press*, 489 U.S. at 774. The Court’s decision to allow secrecy here would send to all Federal agencies an incorrect reading of Exemption 7(F). If records of mitigated violations or violator names could be withheld based on bare allegations of hypothetical danger, free from FOIA’s policy of disclosure, other Federal agencies will join FERC in applying 7(F) illegally.

VIII. CONCLUSION

Plaintiff has presented three amended requests and has not received all of the records to which he and the public are entitled. Plaintiff agreed, in good faith and at Defendant's suggestion, to narrow his three requests to accept just the cover sheet (page 1) of the public version of the NOPs, with the name of the URE and docket number at the top of each cover sheet. The records requested contain the names of utility companies that were issued NOPs by FERC for violations at least three years ago. Nearly all of these violations have been mitigated.

FERC has not met its burden of proof. FERC did not produce a Vaughn Index. Furthermore, it did not specifically analyze URE names, and produce that analysis to Plaintiff or this Court.

Defendant contends that both Exemptions 3 and 7(F) apply to Plaintiff's requests, yet Defendant offers no analysis of why any URE name would be dangerous to the public if disclosed. Indeed, contradictory evidence exists that no danger to the public exists if the names of offending companies are released. This release of offender names occurs regularly across the government in nearly every other context by nearly every other agency.

Of the 1,490 NOPs in this case, Plaintiff has proffered and provided detailed information about four specific NOPs which demonstrate that FERC misapplied Exemptions 3 and 7(F). Additionally, Plaintiff has presented to the Court six names denied to him that were disclosed to others.

FERC inaccurately asserts that Exemption 3 applies. Its declarant has alleged that the names at issue in this case are CEII and can thus be withheld through the FAST Act. Plaintiff has presented extensive analysis of the legal standard proving that the names do not meet the statutory or regulatory requirements to be defined as CEII.

FERC misunderstands the Exemption 7(F) law when it applies that Exemption to the names of utility companies. As detailed above, Exemption 7(F) is intended to protect the public from such information that, if obtained by bad actors, could reasonably be expected to endanger the life or physical safety of others. This Exemption applies to information such as murder investigation informants, or dam failure inundation maps and *ongoing* emergency action plans. It does not apply to innocuous information like the name of a utility company that has violated a safety standard and mitigated the violation.

FERC has presented no individualized evidence on the applicability of either Exemption 3 or Exemption 7(F), and has released information inconsistent with its assertions of statutory exemptions. Plaintiff has presented significant contradictory evidence. Since 252 of the 253 dockets in this case have been mitigated (according to FERC itself) and no longer present a danger to the public, FERC's protestations to disclosure do not survive judicial scrutiny, nor are they in accord with other Federal agencies and the law.

THEREFORE, for the reasons mentioned *supra*, Defendant's Motion for Summary Judgment [ECF 41] must be denied, [filed herein] Plaintiff's Cross-Motion for Summary Judgment must be granted, and FERC must be ordered to promptly disclose the requested records

Dated this 13th day of June, 2022.

Respectfully submitted,

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