



Western Electricity Coordinating Council

# *WECC Update*

## *Compliance and Enforcement*

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WIRAB/CREPC Meeting  
November 5, 2009

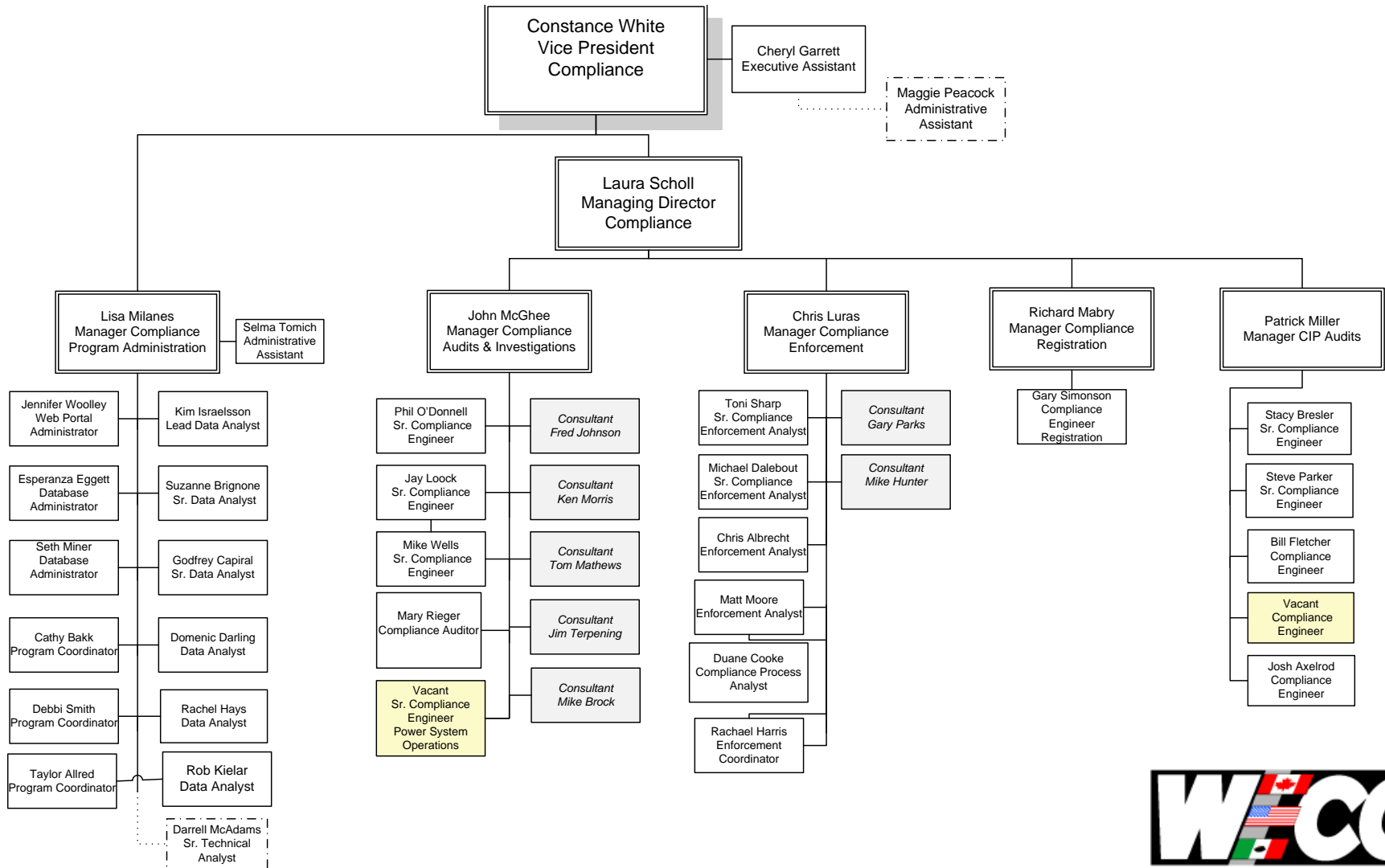
Chris Luras  
Manager of Compliance Enforcement

# *WECC COMPLIANCE UPDATE*

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- Compliance – a 4Q09 Snapshot
- Audit Update (Order 693 and 706 Audits)
  - 693'ers
  - 706'ers - Critical Infrastructure Protection
- Technical Feasibility Exceptions
- Enforcement Update
- Status of “Backlog” Violations
- Final Points

# WECC Compliance Department – 4Q09



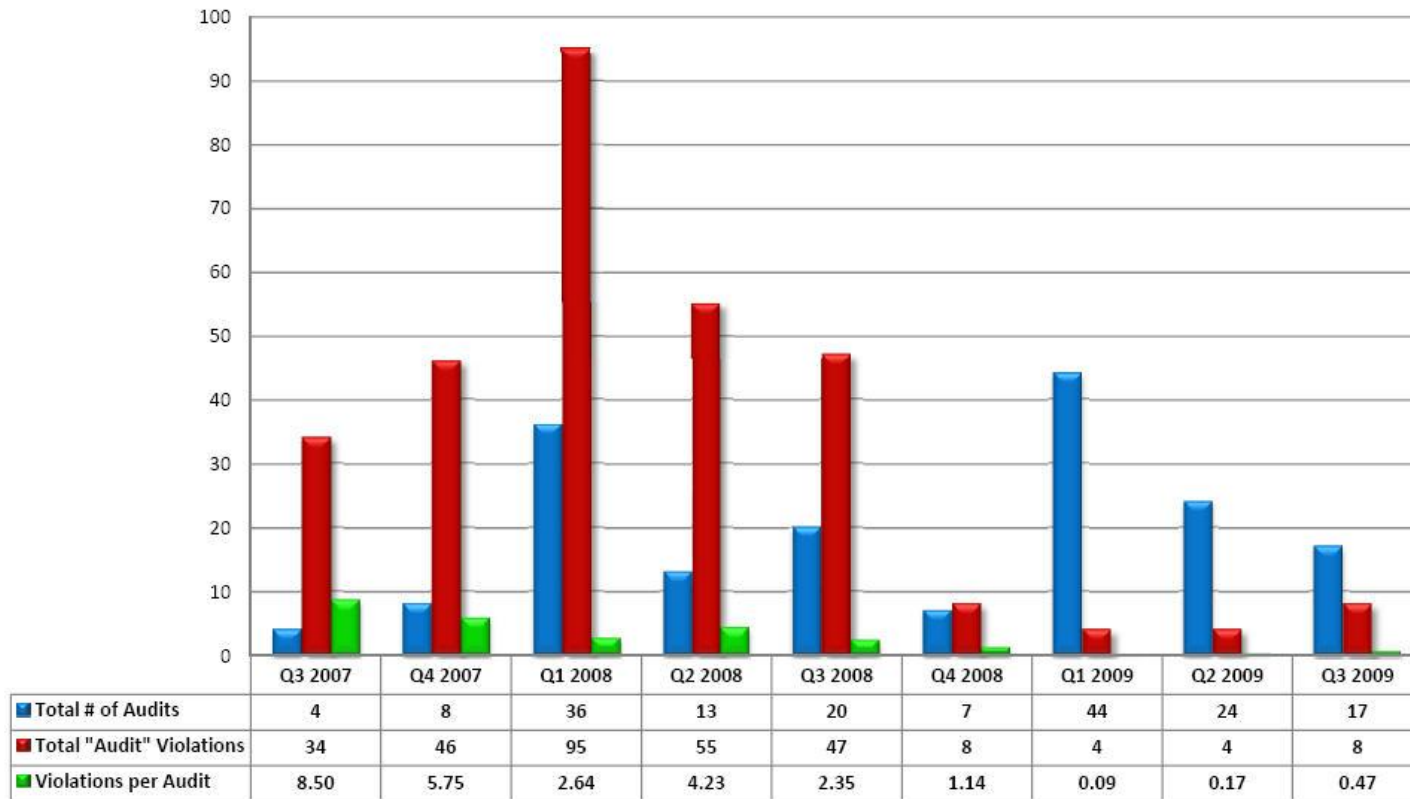
# *Order 693 Audit Update*

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- Audit teams continue to receive high marks for professionalism and expertise
- Moving toward electronic data submittal
- Improved Compliance Culture WECC-wide
  - Better understanding of the Standards
  - “Stronger commitment towards compliance”
  - Number of possible violations per audit declined in 2009

# Audit Violation Trends

Summary of Audit Violations - Post June 18, 2007



# *Order 706 (CIP) Spot Check Update*

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- Key Learnings

- Due to complexity of data and processes, spot checks requiring “deeper dive”
- Violations take longer to process through Enforcement

- Positive Feedback from NERC and FERC Observers

- Depth and breadth of reviews

# *CIP Technical Feasibility Exceptions (TFEs)*

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- Part A Implementation – 10/12/09
  - WebEx Outreach
  - Anticipate majority of filings in January 2010
- Subsequent Part B Reviews of TFE evidence will be conducted via spot check
- FERC has not yet approved the entire process; WECC anticipates changes
- Significant amount of workload for both the Registered Entity and WECC

# *Enforcement Update*

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- Omnibus approved by NERC; awaiting FERC approval
- 2 WECC violations have been approved by FERC
- WECC has settled 919 violations for 175 Entities (10/29/2009)
- Real time processing of violations

# *Enforcement Trends - 2009*

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- 86 percent of all violations are from Self Reports or Self Certifications
- Dismissal Rate decreased in 2009
- Penalties
  - Most of the 2009 NAVAPS contain a penalty, whereas only some of the 2008 NAVAPS contained a penalty
- In approximately 20 percent of the NAVAPS issued, Entity Accepts the violations and penalties
- Settlement Negotiations usually last one day

# *Status of Violations – October 2008*

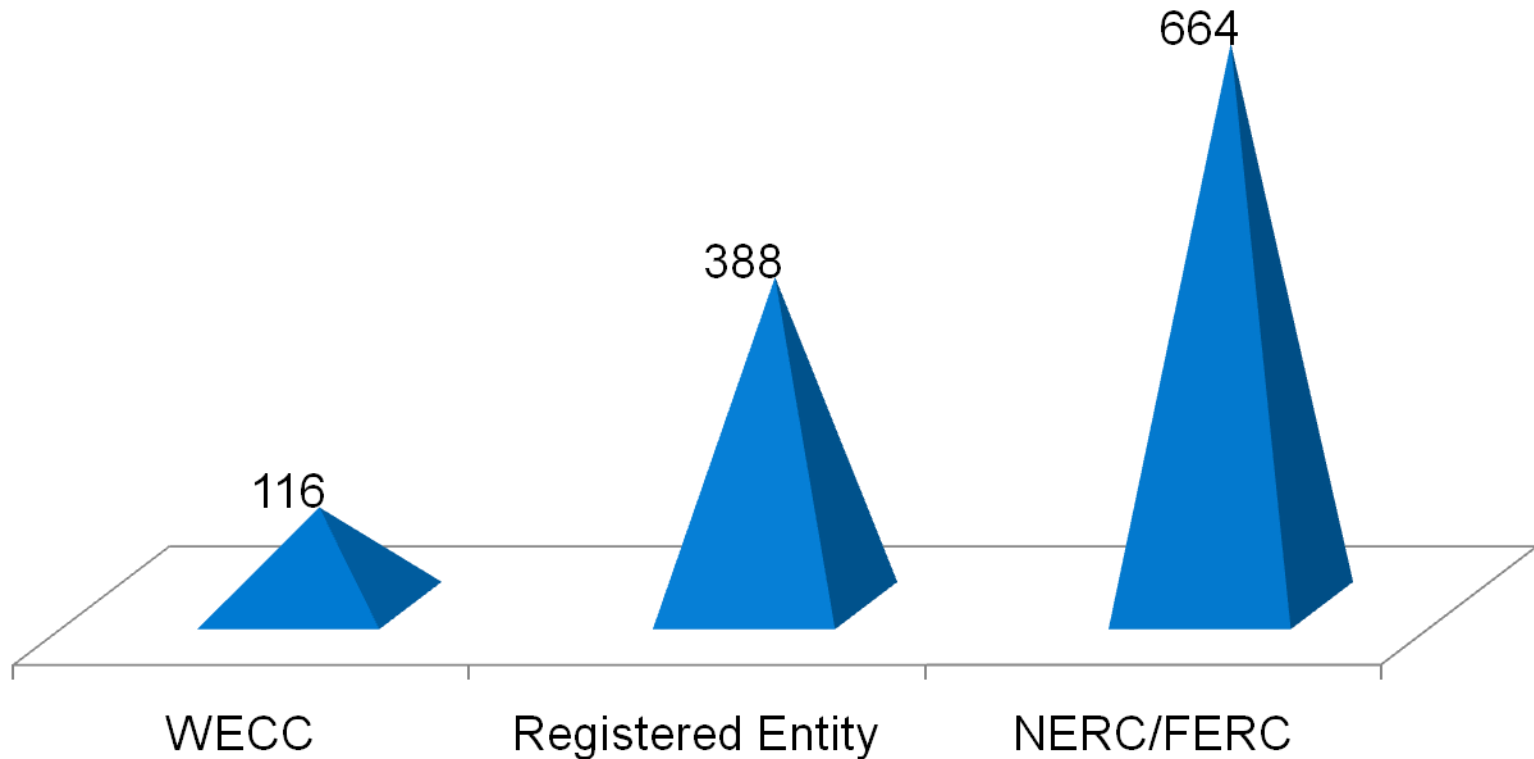
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- 776 violations hadn't received a NAVAPS
- Zero Violations at NERC /FERC

# Status of Violations - Current

10/29/2009

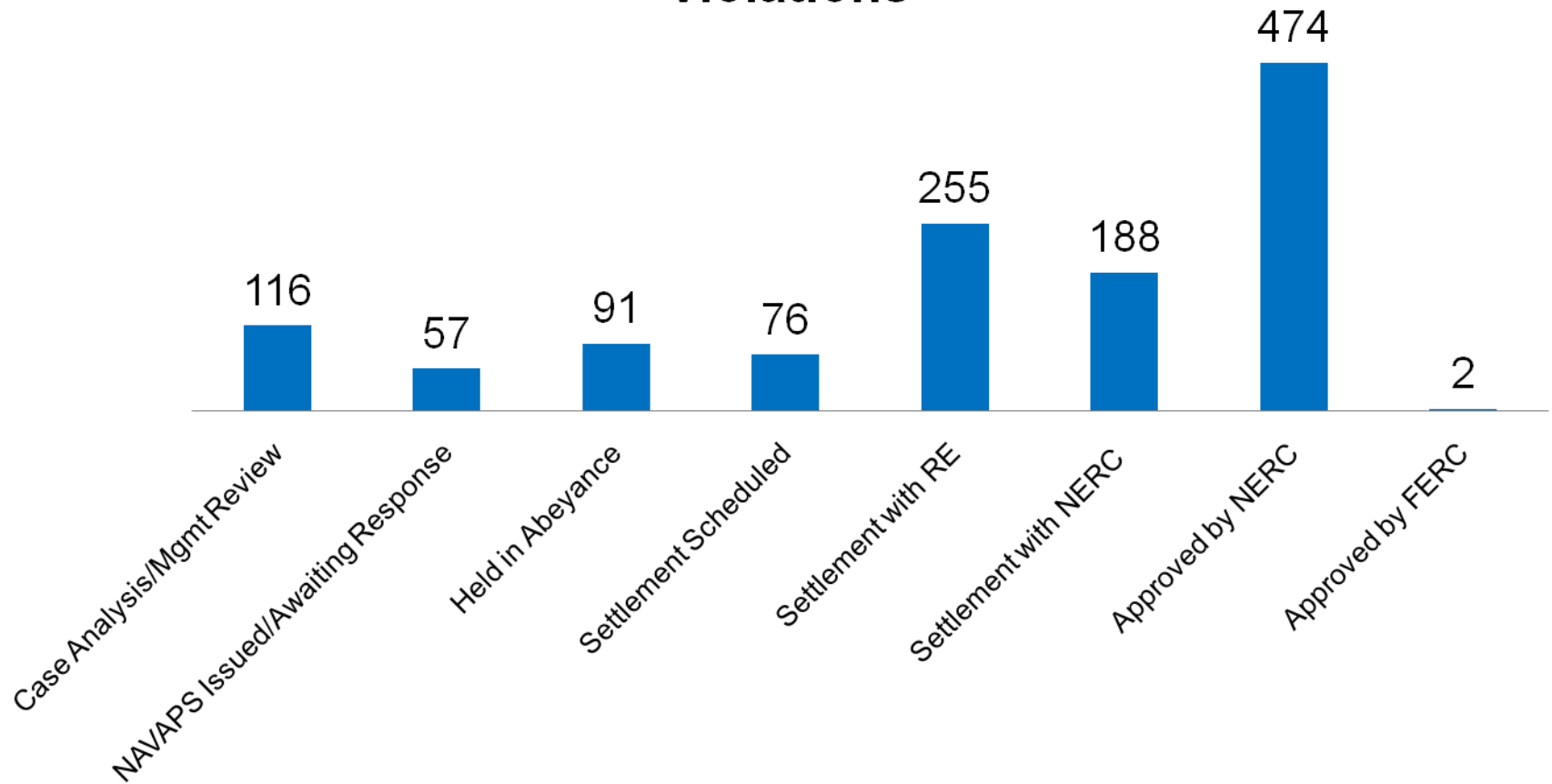
## Violations



# Status of Violations - Current

10/29/2009

## Violations



# *Final Points*

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- Penalties
  - Majority of 2009 WECC cases have Penalties associated with the violations
- Focus on new CIP Standards and TFEs
- Violations will be processed efficiently and quickly

# QUESTIONS?

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Chris Luras  
Manager of Compliance Enforcement  
WECC  
801-883-6887  
[cluras@wecc.biz](mailto:cluras@wecc.biz)