



## Secure the Grid Coalition

A Project of the Center for Security Policy  
2020 Pennsylvania Avenue, N.W., Suite 189  
Washington, D.C. 20006

June 4, 2020

The Honorable Angus King  
The Honorable Mike Gallagher  
Cyberspace Solarium Commission  
2900 Crystal Drive, Suite 250  
Arlington, VA 22202

Dear Senator King and Representative Gallagher:

We represent a large coalition of national security experts, policymakers, government civil servants, and patriotic American citizens who are rightly and deeply concerned about the security of our nation's most critical infrastructure – the electric grid. We are writing first to *commend* you on the excellent work of the Solarium Commission. Secondly, we write to *warn* you about the danger to the security, reliability, and safety of the electric grid created by a bill recently filed by Senators Murkowski & Risch in the Senate Energy Committee: [S.3688](#).

As you will see in Appendix A, we collectively conclude that there is no way this bill could be amended and still be helpful for the cybersecurity of energy infrastructure. It appears that it was drafted by the utility industry for the express purpose of codifying the current “security through obscurity” regime that keeps us vulnerable and betrays the public trust. This systemic coverup of electric grid standard violations by the industry and their self-regulator, the North American Electric Reliability Corporation (NERC) has been enabled by the Federal Energy Regulatory Commission (FERC).

As you will see in Appendix B, one of our Coalition members – Command Sergeant Major Michael Mabee (U.S. Army, Retired) – wrote to Senators Murkowski and Manchin 18 months ago with his concerns about this coverup and how, since it began in 2010, there have been far fewer incentives for grid operators to fix grid security issues. Mr. Mabee's letter was met with no response.

As you will see in Appendix C, Mr. Mabee created the CIP violation database to disclose to the public the identities of violators of Critical Infrastructure Protection (CIP) standards as his investigation continues. Unfortunately, Mr. Mabee was forced to file a lawsuit against FERC under the Freedom of Information Act (FOIA) due to FERC's delay and denial of his FOIA requests.

On August 27, 2019, FERC opened Docket AD19-18-000 with a “White Paper” requesting comments from the public on the issue of transparency. As you will see in Appendix D, there were 61 individuals and/or organizations which filed comments in favor of increased transparency and 12 which filed comments against it. Clearly, the public and state governments favored increased transparency.

Two very important findings of your Commission that S.3688 seriously challenges are (1) the current vulnerability of national security facilities in many of the 50 states, including Alaska and Hawaii and (2) the systemic weaknesses of the FERC/NERC CIP standard, i.e., how few (less than 10%) of the lower 48 state Transmission systems are covered by those standards. Alaska and Hawaii are further menaced by the exclusion of those states from Section 215 of the EPA which S.3688 ignores.

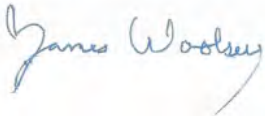
Similarly, the Executive Order on Securing the United States Bulk-Power System (13920) issued on May 1, 2020 declared a national emergency with respect to the threat to the United States bulk-power system and improved the conditions through which your Commission's recommendations could be applied to the electric power industry, especially with regard to mitigating supply chain vulnerabilities. In fact, numerous security experts have pointed out that the current NERC CIP standards on

cybersecurity do not comport with this Executive Order, prompting FERC to open a legal docket on this important matter ([Docket EL20-46-000](#)). S.3688 could make it extremely difficult for independent security experts to analyze inconsistencies such as these and thus curtail the much-needed public policy debate on how to improve the nation’s cybersecurity.

**The Solarium Commission’s major recommendation on Deterrence critically needs early implementation to establish a solid base for cybersecurity defense of the nation; clearing the way for subordinate actions on DoD and IC defensive measures, regulatory standards, EO13920 tasks, and other pending congressional legislation. S. 3688 stands in the way.**

We hope that this letter and its associated appendices make it clear to your Commission that the S. 3688 was crafted in order to further obscure from public scrutiny the types of real reforms needed to improve security – and especially cybersecurity – for the electric grid, that it is contrary to the public interest, and that it should be met with opposition from elected officials who place transparency, accountability, and security above the special interests of the industries regulated by government.

Sincerely,



Ambassador R. James Woolsey  
Former Director,  
Central Intelligence



Frank Gaffney  
Founder & Executive Chairman,  
Center for Security Policy



Tommy Waller  
Director,  
Secure the Grid Coalition



CSM Michael Mabee, USA Ret.  
Unpaid Volunteer Researcher  
Secure the Grid Coalition

Appendix A – Irreparable Issues with S. 3688

Appendix B – Letter to Senators Murkowski & Manchin, January 30, 2019

Appendix C – Website: CIP Violation Database and FOIAs

Appendix D – Article: Multiple States to FERC: “The public has a right to know”

cc:

Senate Energy and Natural Resources Committee

## Appendix A – Irreparable Issues with S. 3688

Below are the reasons we our Secure the Grid Coalition believes that S.3688 exacerbates grid vulnerabilities and violates the public trust:

- **It appears to conflict directly with and counteract progress made by the Congressional Solarium Commission (CSC).** We have found that the bill could be a serious complication to the authorities, responsibilities and actions detailed in dozens of CSC-recommended organizational and legislative changes aimed at a more “federal” national cybersecurity program.
- **It codifies a major departure from the original intent for transparency & public disclosure.** The initial agreements established between the Federal Government and the electric power industry at the inception of the FERC/NERC regulatory regime were that this self-regulated industry was supposed to maintain a “high level of transparency and public disclosure” and ensure that members of the public would have access to and be able to participate in the rulemaking and enforcement regime. This bill shutter access to the public by:
  - Exporting the “Security through Obscurity” regime to other government agencies by offering assistance to those agencies in labeling information as Critical Energy Infrastructure Information (CEII) in order to prevent FOIA access;
  - Codifying government inaction and regulatory malfeasance by releasing FERC from any responsibility for untimely processing of FOIA requests, establishing that FERC’s failure to grant or deny a request after (1) year from submission will automatically designate the requested information as CEII and for a period of 10 years.
  - Allowing blanket CEII designations for a duration that can be extended at the will of FERC (i.e., forever);
  - Allows utilities the freedom *not* to designate information as CEII until after it becomes the subject of a FOIA request;
  - Allows FERC to later designate information as CEII that they previously determined wasn’t;
  - Establishes that FERC may grant CEII to a member of the public only if that member has entered into an NDA with the source of the information which has been approved by an administrative law judge from DOE or FERC.

Again, it should be noted that this bill was filed following FERC’s “White Paper” on transparency and Docket Docket AD19-18-000. On that docket, Former Chief Information Officer of the U.S. National Security Agency (NSA), George Cotter stated the following:

*“There are no security benefits that will accrue to the BPS by further denial of access to violations of CIP Standards. NERC E-ISAC is aware of this entire threat evolution. NERC should be held criminally liable should these capabilities ever be used against this nation. Instead, NERC jointly sponsors this industry biased White Paper thinly disguised as protective of the BPS, in reality intended to further insulate utilities from liability lawsuits, state PUCs, CIP compliance actions, and, of course, other Federal examination.”<sup>1</sup>*

Considering this, if S. 3688 were to become law and when a safety, reliability, or security violation causes a major blackout and loss of life and property, how will policymakers or the public ever ascertain who should be held liable? This is an unprecedented insulation from

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<sup>1</sup> <https://securethegrid.com/wp-content/uploads/2019/09/2019-09-12-Comments-of-George-Cotter-001433795044-1.pdf>

liability for the federal regulators and the industry upon which every other industry depends and it comes at great expense to the public trust.

- **It establishes a parallel classification system not in the public interest & violates Executive Order 13526 of December 29, 2009 “Classified National Security Information”<sup>2</sup>:** The bill codifies “CEII” which has informally been established by the electric power industry and FERC as a parallel classification system that is not in the public interest and is in conflict with established federal guidelines. For example,
  - Section 1.2 of Executive Order 13562 states that *“Information may be classified at one of the following three levels: (1) Top Secret, (2) Secret, (3) Confidential”* and that *“Except as otherwise provided by statute, no other terms shall be used to identify United States classified information.”*
  - *“Sec. 1.7. Classification Prohibitions and Limitations. (a) In no case shall information be classified, continue to be maintained as classified, or fail to be declassified in order to:  
(1) conceal violations of law, inefficiency, or administrative error;  
(2) prevent embarrassment to a person, organization, or agency;  
(3) restrain competition; or  
(4) prevent or delay the release of information that does not require protection in the interest of the national security.”*

As we have made clear in Appendices B through D, we have observed that since 2010, electric utilities have routinely used CEII as an excuse to conceal violations of law, inefficiency, and administrative error and to prevent embarrassment. This legislation gives those utilities free reign to expand this repugnant practice and maintain it indefinitely, to the great detriment of the public. It also prevents a concerned public from utilizing the Freedom of Information Act (FOIA) to ascertain which utilities have violated standards, broken laws, or put their ratepayers at risk.

- **It forces states to adopt inadequate cybersecurity standards, conceals risks to their ratepayers, and diminishes the emerging capabilities of the National Guard and Reserves to cyber defend critical assets in their states.** The bill forces the states to conform to the CIP standards which our Secure the Grid Coalition has pointed out are inadequate and rarely enforced. The bill also prevents state Public Service Commissioners from learning about risks to their rate payers. Finally, at a time when the SecDef, Service Secretaries, and the National Guard Bureau are exploring methods to identify and train National Guard and structured Military Reserve elements at each such state level for potential development for cybersecurity roles for the grid (and other) critical infrastructure defense, this bill constructs massive bureaucratic and administrative obstacles to that progress. The bill could force states that have already set up cyber units, and gained appropriate authorities therein, to go back to the drawing board with regard to information sharing.
- **It may violate the jurisdiction of other federal organizations and ruin their efforts at gaining public trust.** Attorneys in each of the affected federal agencies will have to take a close look at the bill, but on its surface it appears to violate the established jurisdictions of these agencies. For example, the Nuclear Regulatory Commission has worked diligently to involve the public on issues of safety and this bill could stifle those efforts and compromise the trust and confidence gained by the American public in the safety and security of the nuclear power industry if they thought that NRC could use the legislation to begin concealing information from public scrutiny under the guise of CEII.

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<sup>2</sup> <https://www.govinfo.gov/content/pkg/CFR-2010-title3-vol1/pdf/CFR-2010-title3-vol1-eo13526.pdf>

- **Stifles needed changes in corporate culture which put the public at great risk.** This bill incentivizes utilities to continue obscuring from public and regulator scrutiny any and every vulnerability and/or issue of non-compliance with established safety, security, and reliability standards. The bill enables utilities to make up arguments on the fly that information is “CEII” in an effort to keep it from public view.

Pacific Gas and Electric (PG&E) is a case study of how corporate culture that is lackadaisical about security and compliance puts its ratepayers at risk. This bill would further enable the types of egregious behavior that has already resulted in felony convictions, massive economic damages, and significant loss of life, on the part of PG&E such as:

- Physical Security risks – a year after the now famous April 16, 2013 attack on PG&E’s Metcalf substation, the same substation was breached in August 2014<sup>3</sup> and the utility’s director of corporate security said publicly that PG&E has ‘high level security’ at critical facilities” while reporting internally that “In reality PG&E is years away from a healthy and robust physical security posture.”<sup>4</sup> Further obscurity of physical security violations will only reinforce this type of dishonesty.
  - Safety risks – On July 31, 2009, PG&E was fined \$100,000 for violating the transmission vegetation management standard. Then, after the NERC/FERC coverup began in 2010 there are violations this standard in the Western Interconnection. This is the same location where more than 86 deaths occurred in the “Camp Fire” – the deadliest and most destructive wildfire in California history. It is possible PG&E is a culprit but their identify remains concealed from public scrutiny.<sup>5</sup>
  - Cybersecurity risks – On May 30, 2016 cybersecurity expert Chris Vickery reported a massive data breach by PG&E. On February 28, 2018 NERC issued a “Notice of Penalty regarding Unidentified Registered Entity” in which the NERC-anonymized entity apparently agreed to pay penalties of \$2,700,000 for very serious cybersecurity violations.<sup>6</sup> The PG&E data breach in 2016 and NERC’s cover-up of the identity of the “Unidentified Registered Entity” — who by NERC’s own admission was involved in a dangerous data breach — is ample proof that a watchful regulator is necessary to protect the bulk power system. Yet, it seems that regulator currently conspires with its Congressional overseers to further insulate the industry and itself from public scrutiny.
  - Economic risks – PG&E ultimately went bankrupt and now either the rate payer or the taxpayer will foot the bill for their recovery. In either case, how is it in the public interest that a utility be allowed to incur so many risks and yet be insulated so well from public scrutiny?
- **Stifles security and resilience investments & cost recovery mechanisms:** We observe that the Federal Power Act of 2005, section 215, was an unfunded mandate whereby utilities have been told they have to improve cybersecurity but that the cost recovery would come from Public Utility Commissioners. Utilities now face issues with paying for necessary security and reliability upgrades because they are a “victim of their own success” in obscuring from public scrutiny the challenges they face on these fronts since their violations have been covered up for so long. This bill will “codify that coverup” and enable even more safety, security, and reliability violations to be lumped in as “CEII” and further distance the industry from achieving cost recovery mechanisms. The bill severely disadvantages state public service commissioners in being able to maintain visibility over the industry’s vulnerabilities, making the industry less capable of justifying rate increases to pay for resilience.

<sup>3</sup> <https://www.mercurynews.com/2014/08/28/puc-launches-probe-into-breach-at-pge-substation-in-san-jose/>

<sup>4</sup> <https://michaelmabee.info/metcalf-attack-pge-security-memo/>

<sup>5</sup> <https://michaelmabee.info/transmission-vegetation-management/>

<sup>6</sup> <https://michaelmabee.info/grid-cybersecurity-comments-ferc/>

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January 30, 2019

The Honorable Lisa Murkowski, Chairman  
The Honorable Joe Manchin III, Ranking Member  
U.S. Senate Committee on Energy and Natural Resources  
304 Dirksen Senate Building  
Washington, DC 20510

Dear Senators Murkowski and Manchin

I am writing in regard to the systemic coverup of electric grid standard violations by the utility industry and their self-regulatory body, the North American Electric Reliability Corporation (NERC). This coverup has been enabled by the Federal Energy Regulatory Commission (FERC).

I am a regular citizen who has discovered the magnitude of this betrayal of the public trust. I ask that your committee open a formal investigation. With continuing wildfires caused by utilities in the Western Interconnection, and the names of vegetation management violators being hidden, many lives are at risk. A cybersecurity attack and resulting long-term blackout could also cause widespread casualties.

In February of 2018, I read about a “white hat” security researcher who found confidential records of PG&E’s network configuration, including passwords, on the public internet. Checking the FERC library, I found a record of a cybersecurity standard violation in about the same timeframe. However, FERC and NERC did not name the violator, instead calling the utility an “Unidentified Registered Entity.”

I filed a Freedom of Information Act (FOIA) request – and an appeal when my request was denied – in order to obtain the identity of the violator.<sup>1</sup> To this day, further details are still withheld from public examination.

On August 24, 2018, the Wall Street Journal ran a story titled: “PG&E Identified as Utility That Lost Control of Confidential Information.” Subtitle: “As a result of 2016 failure, 30,000 records about PG&E’s cyber assets were exposed on the internet.”<sup>2</sup> This was the first time the public found out about PG&E’s massive cyber breach and that PG&E was the violator subjected to a 2.7 million dollar regulatory fine. I was quoted in the Wall Street Journal article and cited as the source of the information.

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<sup>1</sup> See FERC docket number NP18-7-000.

<sup>2</sup> Smith, Rebecca. The Wall Street Journal. August 24, 2018. <https://www.wsj.com/articles/pg-e-identified-as-utility-that-lost-control-of-confidential-information-1535145850> (accessed November 22, 2018).

I did further research and discovered that since July of 2010, NERC has routinely been withholding the identities of regulated entities that violate Critical Infrastructure Protection (CIP) Standards even when there is no reasonable “national security” reason to do so. FERC has allowed this odious practice to continue, even though the agency has a regulation clearly stating that the Notices of Penalty will be disclosed to the public after the vulnerability is remedied.<sup>3</sup>

My research has uncovered that FERC has hidden information in 243 dockets involving at least 1465 registered entities between 2010 and 2018. Attached is a list of these dockets for your review. I have filed FOIA request for these records, but I expect, as happened previously, NERC will oppose the release of this information and FERC will deny my request. I believe that without the intervention of your oversight committee, this FERC/NERC cover up will likely continue.

A review of the publicly available information on these dockets reveals troubling issues, however, without the disclosure of the names of the entities and the text of settlement agreements, it is impossible for the public to fully appreciate how standards violations by utilities place lives at risk. Here are some examples:

- Since the Metcalf substation attack on April 16, 2013, one would think that there would be utility focus on physical security for high voltage transformers – most of which are guarded only by a chain link fence and crossed fingers. So exactly how many enforcement actions would you guess there have been in the last 5 years for “CIP-014” physical security? Only one. (FERC Docket NP18-14-000.)
- Many of the “penalties” result from settlement agreements (e.g., the “Unidentified Registered Entity” agreed to pay the “penalty” and in many cases does not admit fault for the violation). Without knowing the details of the settlement agreements, the public cannot adequately analyze the terms and penalties, or even identify offending utilities.
- In some of the cases that were “settled,” the regulated entities were “uncooperative” (FERC Docket NP16-12-000) or “not fully transparent and forthcoming” (FERC Docket NP18-7-000). “Settling” with such actors raises many regulatory red flags and the public needs to analyze these FERC-approved transactions in more detail.
- I have found numerous examples of non-CIP violations that have been redacted. For example, I have found at least 4 violations of vegetation management standards for transmission lines in the Western Interconnection – the same region where over 86 deaths occurred in the “Camp Fire” – the deadliest and most destructive wildfire in California history. This is the same region where a “regulated entity” (PG&E) has significant liability for wildfires. The public has a right to know who standard violators are.

After this FERC/NERC cover up started in July of 2010, *there has been less incentive to fix the grid security problems*. That’s why disclosure is important. Why should utilities spend money to fix grave cybersecurity issues if they know that 1) if caught, the friendly regulator will “settle” the violation privately, 2) the utility can negotiate a trivial fine, and 3) the utility’s name will not be disclosed to the public?

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<sup>3</sup> 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.”

I request that your Committee hold a hearing on this critical matter. I am willing to testify as to my findings and research, as well, as why this conduct by NERC and FERC is endangering the U.S. electric grid and the public safety.

Respectfully,

A handwritten signature in blue ink, appearing to read 'mabe', is positioned above the name Michael Mabee.

Michael Mabee

Attachment: FERC Dockets where identities of CIP violators were withheld from the public

CC: Senator Maggie Hassan (NH)  
Senator Jeanne Shaheen (NH)  
Representative Ann McLane Kuster (NH)



"Unidentified Registered Entity" Dockets 2010-2018

| Date       | FERC Docket Number | Region   | Registered Entity                       | Entities | Total Penalty (\$) | NOP                               | Order                               | A2 Spreadsheet                                |
|------------|--------------------|----------|---|----------|--------------------|-----------------------------------|-------------------------------------|---|
| 7/6/2010   | NP10-130-000       | SERC     | Unidentified Registered Entity          | 1        | \$0                | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 7/6/2010   | NP10-131-000       | SERC     | Unidentified Registered Entity          | 1        | \$5,000            | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 7/6/2010   | NP10-134-000       | SPP      | Unidentified Registered Entity          | 1        | \$0                | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 7/6/2010   | NP10-135-000       | WECC     | Unidentified Registered Entity          | 1        | \$8,000            | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 7/6/2010   | NP10-136-000       | WECC     | Unidentified Registered Entity          | 1        | \$7,000            | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 7/6/2010   | NP10-137-000       | WECC     | Unidentified Registered Entity          | 1        | \$39,000           | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 7/6/2010   | NP10-138-000       | RFC      | Unidentified Registered Entity          | 1        | \$5,000            | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 7/6/2010   | NP10-139-000       | WECC     | Unidentified Registered Entity          | 1        | \$3,000            | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 7/6/2010   | NP10-140-000       | RFC      | Unidentified Registered Entity          | 1        | \$5,600            | <a href="#">View NOP</a>          | <a href="#">View Order</a>          | <a href="#">View Data request</a>             |
| 7/30/2010  | NP10-159-000       | WECC     | Unidentified Registered Entity          | 1        | \$109,000          | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 9/13/2010  | NP10-160-000       | WECC     | Unidentified Registered Entity          | 1        | \$0                | <a href="#">View NOP</a>          | <a href="#">View Order 1</a>        | <a href="#">NERC Filing</a>                   |
| 10/7/2010  | NP11-1-000         | WECC     | Unidentified Registered Entity          | 1        | \$106,000          | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 10/7/2010  | NP11-2-000         | WECC     | Unidentified Registered Entity          | 1        | \$9,000            | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 10/7/2010  | NP11-3-000         | SERC     | Unidentified Registered Entity          | 1        | \$6,000            | <a href="#">View NOP</a>          | <a href="#">View Order</a>          | <a href="#">View Data Request</a>             |
| 10/7/2010  | NP11-4-000         | FRCC     | Unidentified Registered Entity          | 1        | \$250,000          | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 10/7/2010  | NP11-5-000         | SERC     | Unidentified Registered Entity          | 1        | \$16,000           | <a href="#">View NOP</a>          | <a href="#">View Order</a>          | <a href="#">View Data Request</a>             |
| 11/5/2010  | NP11-21-000        | RFC      | Unidentified Registered Entity          | 1        | \$8,000            | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 11/5/2010  | NP11-22-000        | SERC     | Unidentified Registered Entity          | 1        | \$5,000            | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 11/30/2010 | NP11-47-000        | SERC     | Unidentified Registered Entity          | 1        | \$0                | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 11/30/2010 | NP11-56-000        | SERC     | Unidentified Registered Entity          | 1        | \$0                | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 12/22/2010 | NP11-59-000        | RFC      | Unidentified Registered Entity          | 1        | \$7,000            | <a href="#">View NOP</a>          | <a href="#">View Extension</a>      |   |
| 12/22/2010 | NP11-63-000        | WECC     | Unidentified Registered Entity          | 1        | \$80,000           | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 12/22/2010 | NP11-64-000        | WECC     | Unidentified Registered Entity          | 1        | \$38,500           | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 12/22/2010 | NP11-70-000        | WECC     | Unidentified Registered Entity          | 1        | \$55,000           | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 12/22/2010 | NP11-72-000        | SERC     | Unidentified Registered Entity          | 1        | \$2,000            | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 12/22/2010 | NP11-76-000        | SERC     | Unidentified Registered Entity          | 1        | \$0                | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 12/22/2010 | NP11-79-000        | FRCC     | Unidentified Registered Entity          | 1        | \$100,000          | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 12/22/2010 | NP11-81-000        | MRO, SPP | Unidentified Registered Entities        | 2        | \$50,000           | <a href="#">View NOP</a>          | <a href="#">View Order</a>          |   |
| 1/31/2011  | NP11-102-000       | WECC     | Unidentified Registered Entity          | 1        | \$6,500            | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 1/31/2011  | NP11-98-000        | WECC     | Unidentified Registered Entity          | 1        | \$5,000            | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 2/1/2011   | NP11-104-000       | Various  | <b>Unidentified Registered Entities</b> | 6        | \$9                | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 2/23/2011  | NP11-106-000       | RFC      | Unidentified Registered Entity          | 1        | \$15,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 2/23/2011  | NP11-111-000       | MRO      | Unidentified Registered Entity          | 1        | \$120,000          | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 2/23/2011  | NP11-116-000       | FRCC     | Unidentified Registered Entity          | 1        | \$75,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 2/23/2011  | NP11-124-000       | RFC      | Unidentified Registered Entity          | 1        | \$100,000          | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 2/23/2011  | NP11-125-000       | SPP, RFC | Unidentified Registered Entity          | 1        | \$77,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 2/23/2011  | NP11-127-000       | FRCC     | Unidentified Registered Entity          | 1        | \$55,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 2/23/2011  | NP11-128-000       | WECC     | Unidentified Registered Entity          | 1        | \$450,000          | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 2/28/2011  | NP11-133-000       | Various  | <b>Unidentified Registered Entities</b> | 5        | \$11,500           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 3/30/2011  | NP11-136-000       | WECC     | Unidentified Registered Entity          | 1        | \$14,500           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 3/30/2011  | NP11-137-000       | WECC     | Unidentified Registered Entity          | 1        | \$106,000          | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 3/30/2011  | NP11-140-000       | WECC     | Unidentified Registered Entity          | 1        | \$27,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 3/30/2011  | NP11-143-000       | SERC     | Unidentified Registered Entity          | 1        | \$5,000            | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 3/30/2011  | NP11-145-000       | WECC     | Unidentified Registered Entity          | 1        | \$13,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 3/30/2011  | NP11-146-000       | RFC      | Unidentified Registered Entities        | 3        | \$52,500           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |

"Unidentified Registered Entity" Dockets 2010-2018

| Date      | FERC Docket Number | Region     | Registered Entity                | Entities | Total Penalty (\$) | NOP                               | Order                               | A2 Spreadsheet                                |
|-----------|--------------------|------------|----------------------------------|----------|--------------------|-----------------------------------|-------------------------------------|---|
| 3/30/2011 | NP11-149-000       | RFC        | Unidentified Registered Entity   | 1        | \$20,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 3/30/2011 | NP11-150-000       | MRO        | Unidentified Registered Entity   | 1        | \$0                | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 3/30/2011 | NP11-155-000       | WECC       | Unidentified Registered Entity   | 1        | \$2,000            | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 3/30/2011 | NP11-156-000       | SERC       | Unidentified Registered Entity   | 1        | \$12,500           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 3/30/2011 | NP11-157-000       | SERC       | Unidentified Registered Entity   | 1        | \$7,000            | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 3/30/2011 | NP11-161-000       | WECC       | Unidentified Registered Entity   | 1        | \$35,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 3/31/2011 | NP11-162-000       | TRE, NPCC  | Unidentified Registered Entities | 2        | \$10,500           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 4/29/2011 | NP11-166-000       | SPP, TRE   | Unidentified Registered Entity   | 1        | \$50,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 4/29/2011 | NP11-167-000       | WECC       | Unidentified Registered Entity   | 1        | \$89,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 4/29/2011 | NP11-174-000       | RFC        | Unidentified Registered Entity   | 1        | \$15,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 4/29/2011 | NP11-175-000       | WECC       | Unidentified Registered Entity   | 1        | \$32,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 4/29/2011 | NP11-176-000       | WECC       | Unidentified Registered Entity   | 1        | \$80,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 4/29/2011 | NP11-178-000       | WECC       | Unidentified Registered Entity   | 1        | \$35,000           | <a href="#">View NOP &gt;</a>     | <a href="#">View Order &gt;&gt;</a> |   |
| 4/29/2011 | NP11-179-000       | MRO        | Unidentified Registered Entity   | 1        | \$10,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 4/29/2011 | NP11-180-000       | WECC       | Unidentified Registered Entity   | 1        | \$71,500           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 4/29/2011 | NP11-181-000       | FRCC, NPCC | Unidentified Registered Entities | 6        | \$39,500           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 5/26/2011 | NP11-182-000       | WECC       | Unidentified Registered Entity   | 1        | \$59,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 5/26/2011 | NP11-184-000       | RFC        | Unidentified Registered Entity   | 1        | \$70,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View Data Request &gt;&gt;</a>    |
| 5/26/2011 | NP11-188-000       | SPP        | Unidentified Registered Entity   | 1        | \$16,860           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 5/26/2011 | NP11-189-000       | FRCC       | Unidentified Registered Entity   | 1        | \$17,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 5/26/2011 | NP11-192-000       | WECC       | Unidentified Registered Entity   | 1        | \$12,200           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 5/26/2011 | NP11-193-000       | WECC       | Unidentified Registered Entity   | 1        | \$60,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 5/26/2011 | NP11-198-000       | SPP        | Unidentified Registered Entity   | 1        | \$17,860           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 5/26/2011 | NP11-199-000       | Various    | Unidentified Registered Entities | 3        | \$3,500            | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 6/29/2011 | NP11-204-000       | WECC       | Unidentified Registered Entity   | 1        | \$37,500           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 6/29/2011 | NP11-205-000       | WECC       | Unidentified Registered Entity   | 1        | \$22,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 6/29/2011 | NP11-206-000       | NPCC       | Unidentified Registered Entity   | 3        | \$80,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View Supplemental &gt;&gt;</a>    |
| 6/29/2011 | NP11-211-000       | WECC       | Unidentified Registered Entity   | 1        | \$14,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 6/29/2011 | NP11-212-000       | WECC       | Unidentified Registered Entity   | 1        | \$381,600          | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 6/29/2011 | NP11-213-000       | WECC       | Unidentified Registered Entity   | 1        | \$143,500          | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View Supplemental &gt;&gt;</a>    |
| 6/29/2011 | NP11-218-000       | WECC       | Unidentified Registered Entity   | 1        | \$130,000          | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 6/29/2011 | NP11-223-000       | SPP        | Unidentified Registered Entity   | 1        | \$30,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 6/29/2011 | NP11-225-000       | RFC        | Unidentified Registered Entity   | 1        | \$10,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 6/29/2011 | NP11-226-000       | RFC        | Unidentified Registered Entity   | 1        | \$85,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 7/28/2011 | NP11-229-000       | WECC       | Unidentified Registered Entity   | 1        | \$75,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 7/28/2011 | NP11-230-000       | RFC        | Unidentified Registered Entity   | 1        | \$18,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 7/28/2011 | NP11-233-000       | WECC       | Unidentified Registered Entity   | 1        | \$70,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 7/28/2011 | NP11-234-000       | WECC       | Unidentified Registered Entity   | 1        | \$35,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 7/28/2011 | NP11-237-000       | RFC        | Unidentified Registered Entity   | 3        | \$180,000          | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 7/28/2011 | NP11-243-000       | RFC        | Unidentified Registered Entity   | 1        | \$20,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 7/28/2011 | NP11-247-000       | RFC        | Unidentified Registered Entity   | 1        | \$15,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 7/28/2011 | NP11-248-000       | WECC       | Unidentified Registered Entity   | 1        | \$5,000            | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 7/28/2011 | NP11-249-000       | WECC       | Unidentified Registered Entity   | 1        | \$18,000           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 7/28/2011 | NP11-250-000       | WECC       | Unidentified Registered Entity   | 1        | \$12,600           | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 7/28/2011 | NP11-251-000       | WECC       | Unidentified Registered Entity   | 1        | \$7,000            | <a href="#">View NOP &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |

"Unidentified Registered Entity" Dockets 2010-2018

| Date       | FERC Docket Number | Region   | Registered Entity                | Entities | Total Penalty (\$) | NOP                                      | Order                               | A2 Spreadsheet  |
|------------|--------------------|----------|----------------------------------|----------|--------------------|--|-------------------------------------|---|
| 7/29/2011  | NP11-253-000       | Various  | Unidentified Registered Entities | 8        | \$26,500           | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 8/31/2011  | NP11-261-000       | RFC      | Unidentified Registered Entity   | 1        | \$70,000           | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> |   |
| 8/31/2011  | NP11-262-000       | SPP      | Unidentified Registered Entity   | 1        | \$12,000           | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> |   |
| 8/31/2011  | NP11-263-000       | TRE      | Unidentified Registered Entity   | 1        | \$11,000           | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> |   |
| 8/31/2011  | NP11-264-000       | SPP      | Unidentified Registered Entity   | 1        | \$8,000            | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> |   |
| 8/31/2011  | NP11-266-000       | Various  | Unidentified Registered Entities | 5        | \$63,500           | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 9/30/2011  | NP11-269-000       | WECC     | Unidentified Registered Entity   | 1        | \$225,000          | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> |   |
| 9/30/2011  | NP11-270-000       | Various  | Unidentified Registered Entities | 21       | \$193,900          | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 9/30/2011  | RC11-6-000         | Various  | Unidentified Registered Entities | 59       | \$0                | <a href="#">View Filing &gt;&gt;</a>     | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-1 Spreadsheet &gt;&gt;</a>           |
| 10/31/2011 | NP12-1-000         | RFC      | Unidentified Registered Entities | 3        | \$275,000          | <a href="#">View Filing &gt;&gt;</a>     | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Corrected Spreadsheet &gt;&gt;</a> |
| 10/31/2011 | NP12-2-000         | Various  | Unidentified Registered Entities | 16       | \$184,200          | <a href="#">View Filing &gt;&gt;</a>     | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 10/31/2011 | RC12-1-000         | Various  | Unidentified Registered Entities | 33       | \$0                | <a href="#">View Filing &gt;&gt;</a>     | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-1 Spreadsheet &gt;&gt;</a>           |
| 11/30/2011 | NP12-3-000         | WECC     | Unidentified Registered Entity   | 1        | \$125,000          | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> |   |
| 11/30/2011 | NP12-4-000         | WECC     | Unidentified Registered Entity   | 1        | \$160,000          | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> |   |
| 11/30/2011 | NP12-5-000         | RF, WECC | Unidentified Registered Entities | 12       | \$89,000           | <a href="#">View Filing &gt;&gt;</a>     | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 11/30/2011 | RC12-2-000         | Various  | Unidentified Registered Entities | 30       | \$0                | <a href="#">View Filing &gt;&gt;</a>     | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-1 Spreadsheet &gt;&gt;</a>           |
| 12/30/2011 | NP12-10-000        | Various  | Unidentified Registered Entities | 21       | \$109,600          | <a href="#">View Filing &gt;&gt;</a>     | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Corrected Spreadsheet &gt;&gt;</a> |
| 12/30/2011 | NP12-9-000         | RFC      | Unidentified Registered Entity   | 1        | \$60,000           | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> |   |
| 12/30/2011 | RC12-6-000         | Various  | Unidentified Registered Entities | 40       | \$0                | <a href="#">View Filing &gt;&gt;</a>     | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-1 Spreadsheet &gt;&gt;</a>           |
| 1/31/2012  | NP12-11-000        | WECC     | Unidentified Registered Entity   | 1        | \$135,000          | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> |   |
| 1/31/2012  | NP12-12-000        | Various  | Unidentified Registered Entities | 18       | \$160,500          | <a href="#">View Filing &gt;&gt;</a>     | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 1/31/2012  | RC12-7-000         | Various  | Unidentified Registered Entities | 30       | \$0                | <a href="#">View Filing &gt;&gt;</a>     | <a href="#">View Order &gt;&gt;</a> |   |
| 2/29/2012  | NP12-16-000        | WECC     | Unidentified Registered Entity   | 1        | \$80,000           | <a href="#">Filing</a>                   |                                     |   |
| 2/29/2012  | NP12-17-000        | SPP RE   | Unidentified Registered Entity   | 1        | \$40,000           | <a href="#">Filing</a>                   |                                     |   |
| 2/29/2012  | NP12-18-000        | Various  | Unidentified Registered Entities | 23       | \$222,900          | <a href="#">View Filing &gt;&gt;</a>     | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 2/29/2012  | RC12-8-000         | Various  | Unidentified Registered Entities | 24       | \$0                | <a href="#">View Filing &gt;&gt;</a>     | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-1 Spreadsheet &gt;&gt;</a>           |
| 3/30/2012  | NP12-20-000        | WECC     | Unidentified Registered Entity   | 1        | \$60,000           | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> |   |
| 3/30/2012  | NP12-22-000        | Various  | Unidentified Registered Entities | 15       | \$42,000           | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 3/30/2012  | RC12-10-000        | Various  | Unidentified Registered Entities | 12       | \$0                | <a href="#">View Filing &gt;&gt;</a>     |                                     | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 4/30/2012  | NP12-25-000        | RFC      | Unidentified Registered Entity   | 1        | \$115,000          | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> |   |
| 4/30/2012  | NP12-26-000        | Various  | Unidentified Registered Entities | 18       | \$95,300           | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 4/30/2012  | RC12-11-000        | Various  | Unidentified Registered Entities | 18       | \$0                | <a href="#">View Supplemental Filing</a> |                                     | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 5/30/2012  | NP12-27-000        | Various  | Unidentified Registered Entities | 20       | \$48,600           | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet</a>                    |
| 5/30/2012  | NP12-29-000        | WECC     | Unidentified Registered Entity   | 1        | \$162,200          | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> |   |
| 5/30/2012  | RC12-12-000        | Various  | Unidentified Registered Entities | 40       | \$0                | <a href="#">View Filing &gt;&gt;</a>     |                                     | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 6/29/2012  | NP12-36-000        | Various  | Unidentified Registered Entities | 15       | \$121,900          | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet</a>                    |
| 6/29/2012  | RC12-13-000        | Various  | Unidentified Registered Entities | 40       | \$0                | <a href="#">View Filing &gt;&gt;</a>     |                                     | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 7/31/2012  | NP12-37-000        | WECC     | Unidentified Registered Entities | 4        | \$134,350          | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> |   |
| 7/31/2012  | NP12-38-000        | WECC     | Unidentified Registered Entity   | 1        | \$72,000           | <a href="#">Filing</a>                   | <a href="#">View Order &gt;&gt;</a> |   |
| 7/31/2012  | NP12-40-000        | Various  | Unidentified Registered Entities | 15       | \$101,100          | <a href="#">Filing</a>                   | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 7/31/2012  | RC12-14-000        | Various  | Unidentified Registered Entities | 30       | \$0                | <a href="#">View Filing &gt;&gt;</a>     |                                     | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 8/31/2012  | NP12-43-000        | WECC     | Unidentified Registered Entity   | 1        | \$70,000           | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> |   |
| 8/31/2012  | NP12-44-000        | Various  | Unidentified Registered Entities | 16       | \$182,800          | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 8/31/2012  | RC12-15-000        | Various  | Unidentified Registered Entities | 38       | \$0                | <a href="#">View Filing &gt;&gt;</a>     | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a>           |
| 9/28/2012  | NP12-45-000        | FRCC     | Unidentified Registered Entity   | 1        | \$150,000          | <a href="#">View NOP &gt;&gt;</a>        | <a href="#">View Order &gt;&gt;</a> |   |

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| Date       | FERC Docket Number | Region    | Registered Entity                | Entities | Total Penalty (\$) | NOP                                  | Order                               | A2 Spreadsheet                                |
|------------|--------------------|-----------|----------------------------------|----------|--------------------|--------------------------------------|-------------------------------------|---|
| 9/28/2012  | NP12-46-000        | WECC      | Unidentified Registered Entity   | 1        | \$200,000          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> |   |
| 9/28/2012  | NP12-47-000        | Various   | Unidentified Registered Entities | 14       | \$113,400          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 9/28/2012  | RC12-16-000        | Various   | Unidentified Registered Entities | 41       | \$0                | <a href="#">View Filing &gt;&gt;</a> |                                     | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 10/31/2012 | NP13-1-000         | WECC      | Unidentified Registered Entity   | 1        | \$200,000          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> |   |
| 10/31/2012 | NP13-4-000         | RFC       | Unidentified Registered Entities | 3        | \$725,000          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> |   |
| 10/31/2012 | NP13-5-000         | Various   | Unidentified Registered Entities | 19       | \$216,000          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 10/31/2012 | RC13-1-000         | Various   | Unidentified Registered Entities | 44       | \$0                | <a href="#">View Filing &gt;&gt;</a> |                                     | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 11/30/2012 | NP13-6-000         | WECC      | Unidentified Registered Entity   | 1        | \$62,500           | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> |   |
| 11/30/2012 | RC13-2-000         | Various   | Unidentified Registered Entities | 25       | \$0                | <a href="#">View Filing &gt;&gt;</a> |                                     | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 12/31/2012 | NP13-11-000        | SPP       | Unidentified Registered Entity   | 1        | \$107,000          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View NOP &gt;&gt;</a>   |   |
| 12/31/2012 | NP13-12-000        | Various   | Unidentified Registered Entities | 21       | \$214,000          | <a href="#">View Filing &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 12/31/2012 | NP13-16-000        | WECC      | Unidentified Registered Entity   | 1        | \$207,000          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View NOP &gt;&gt;</a>   |   |
| 12/31/2012 | NP13-17-000        | RFC       | Unidentified Registered Entities | 3        | \$80,000           | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> |   |
| 12/31/2012 | NP13-18-000        | SPP       | Unidentified Registered Entity   | 1        | \$153,000          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View NOP &gt;&gt;</a>   |   |
| 12/31/2012 | NP13-19-000        | SERC      | Unidentified Registered Entity   | 1        | \$950,000          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View NOP &gt;&gt;</a>   |   |
| 12/31/2012 | RC13-3-000         | Various   | Unidentified Registered Entities | 25       | \$0                | <a href="#">View Filing &gt;&gt;</a> |                                     | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 1/31/2013  | NP13-22-000        | WECC      | Unidentified Registered Entity   | 1        | \$115,000          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> |   |
| 1/31/2013  | NP13-23-000        | Various   | Unidentified Registered Entities | 22       | \$73,000           | <a href="#">View Filing &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 1/31/2013  | RC13-5-000         | Various   | Unidentified Registered Entities | 22       | \$0                | <a href="#">View Filing &gt;&gt;</a> |                                     | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 2/28/2013  | <b>NP13-24-000</b> | WECC      | Unidentified Registered Entity   | 3        | \$151,500          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> |   |
| 2/28/2013  | NP13-27-000        | Various   | Unidentified Registered Entities | 14       | \$53,000           | <a href="#">View Filing &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 2/28/2013  | RC13-6-000         | Various   | Unidentified Registered Entities | 27       | \$0                | <a href="#">View Filing &gt;&gt;</a> |                                     | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 3/27/2013  | <b>NP13-30-000</b> | RFC       | Unidentified Registered Entity   | 3        | \$120,000          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> | <a href="#">View Errata &gt;&gt;</a>          |
| 3/27/2013  | NP13-28-000        | Various   | Unidentified Registered Entity   | 1        | \$90,000           | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> |   |
| 3/27/2013  | NP13-29-000        | Various   | Unidentified Registered Entities | 10       | \$80,000           | <a href="#">View Filing &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 4/30/2013  | NP13-32-000        | NERC      | Unidentified Registered Entity   | 1        | \$40,000           | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> |   |
| 4/30/2013  | NP13-33-000        | Various   | Unidentified Registered Entities | 18       | \$315,250          | <a href="#">View Filing &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 4/30/2013  | RC13-8-000         | Various   | Unidentified Registered Entities | 50       | \$0                | <a href="#">View Filing &gt;&gt;</a> |                                     | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 5/30/2013  | NP13-34-000        | Texas RE  | Unidentified Registered Entity   | 1        | \$137,000          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> | <a href="#">View Errata &gt;&gt;</a>          |
| 5/30/2013  | NP13-38-000        | WECC      | Unidentified Registered Entity   | 1        | \$291,000          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> |   |
| 5/30/2013  | NP13-39-000        | Various   | Unidentified Registered Entities | 16       | \$67,500           | <a href="#">View Filing &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 5/30/2013  | RC13-9-000         | Various   | Unidentified Registered Entities | 53       | \$0                | <a href="#">View Filing &gt;&gt;</a> |                                     | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 6/27/2013  | NP13-41-000        | Various   | Unidentified Registered Entities | 20       | \$198,000          | <a href="#">View Filing &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 6/27/2013  | RC13-10-000        | Various   | Unidentified Registered Entities | 52       | \$0                | <a href="#">View Filing &gt;&gt;</a> |                                     | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 7/31/2013  | NP13-45-000        | WECC      | Unidentified Registered Entity   | 1        | \$198,000          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> |   |
| 7/31/2013  | NP13-46-000        | Various   | Unidentified Registered Entities | 18       | \$112,000          | <a href="#">View Filing &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 7/31/2013  | NP13-47-000        | RFC, SERC | Unidentified Registered Entities | 2        | \$350,000          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> |   |
| 8/30/2013  | NP13-51-000        | Various   | Unidentified Registered Entities | 18       | \$98,000           | <a href="#">View Filing &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> |   |
| 9/30/2013  | NP13-55-000        | WECC      | Unidentified Registered Entity   | 1        | \$150,000          | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> |   |
| 9/30/2013  | NP13-57-000        | Various   | Unidentified Registered Entities | 12       | \$189,000          | <a href="#">View Filing &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 10/30/2013 | NP14-4-000         | RF, SERC  | Unidentified Registered Entities | 16       | \$55,000           | <a href="#">View Filing &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 10/30/2013 | NP14-5-000         | RFC       | Unidentified Registered Entity   | 1        | \$0                | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> |   |
| 11/27/2013 | NP14-6-000         | Various   | Unidentified Registered Entities | 14       | \$142,000          | <a href="#">View Filing &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 12/30/2013 | NP14-14-000        | Various   | Unidentified Registered Entities | 18       | \$276,500          | <a href="#">View Filing &gt;&gt;</a> | <a href="#">View Order &gt;&gt;</a> | <a href="#">View A-2 Spreadsheet &gt;&gt;</a> |
| 12/30/2013 | NP14-16-000        | SERC      | Unidentified Registered Entity   | 1        | \$50,000           | <a href="#">View NOP &gt;&gt;</a>    | <a href="#">View Order &gt;&gt;</a> |   |

"Unidentified Registered Entity" Dockets 2010-2018

| Date       | FERC Docket Number | Region    | Registered Entity                | Entities | Total Penalty (\$) | NOP                              | Order                              | A2 Spreadsheet                       |
|------------|--------------------|-----------|----------------------------------|----------|--------------------|----------------------------------|------------------------------------|--------------------------------------|
| 12/30/2013 | NP14-17-000        | WECC      | Unidentified Registered Entity   | 1        | \$144,000          | <a href="#">View NOP&gt;&gt;</a> | <a href="#">View Order&gt;&gt;</a> |                                      |
| 12/30/2013 | NP14-18-000        | SERC      | Unidentified Registered Entity   | 1        | \$110,000          | <a href="#">View NOP&gt;&gt;</a> | <a href="#">View Order&gt;&gt;</a> |                                      |
| 12/30/2013 | NP14-19-000        | WECC      | Unidentified Registered Entity   | 1        | \$185,000          | <a href="#">View NOP&gt;&gt;</a> | <a href="#">View Order&gt;&gt;</a> | <a href="#">View Errata&gt;&gt;</a>  |
| 12/30/2013 | NP14-20-000        | SERC      | Unidentified Registered Entity   | 1        | \$198,000          | <a href="#">View NOP&gt;&gt;</a> | <a href="#">View Order&gt;&gt;</a> |                                      |
| 12/30/2013 | NP14-22-000        | WECC      | Unidentified Registered Entity   | 1        | \$150,000          | <a href="#">View NOP&gt;&gt;</a> | <a href="#">View Order&gt;&gt;</a> |                                      |
| 12/31/2013 | NP14-21-000        | SERC      | Unidentified Registered Entity   | 1        | \$175,000          | <a href="#">View NOP&gt;&gt;</a> | <a href="#">View Order&gt;&gt;</a> |                                      |
| 12/31/2013 | NP14-23-000        | SPP RE    | Unidentified Registered Entity   | 1        | \$100,000          | <a href="#">View NOP&gt;&gt;</a> | <a href="#">View Order&gt;&gt;</a> |                                      |
| 12/31/2013 | NP14-24-000        | SERC      | Unidentified Registered Entity   | 1        | \$350,000          | <a href="#">View NOP&gt;&gt;</a> | <a href="#">View Order&gt;&gt;</a> |                                      |
| 12/31/2013 | NP14-25-000        | SERC      | Unidentified Registered Entity   | 1        | \$250,000          | <a href="#">View NOP&gt;&gt;</a> | <a href="#">View Order&gt;&gt;</a> |                                      |
| 12/31/2013 | NP14-26-000        | SERC      | Unidentified Registered Entity   | 1        | \$120,000          | <a href="#">View NOP&gt;&gt;</a> | <a href="#">View Order&gt;&gt;</a> |                                      |
| 2014-01-30 | NP14-29-000        | WECC      | Unidentified Registered Entity   | 1        | \$109,000          | <a href="#">View NOP</a>         | <a href="#">View Order</a>         |                                      |
| 2014-01-30 | NP14-30-000        | RFC       | Unidentified Registered Entity   | 1        | \$75,000           | <a href="#">View NOP</a>         | <a href="#">View Order</a>         |                                      |
| 2014-02-27 | NP14-32-000        | SPP RE    | Unidentified Registered Entity   | 1        | \$0                | <a href="#">View NOP</a>         | <a href="#">View Order</a>         |                                      |
| 2014-03-31 | NP14-37-000        | WECC      | Unidentified Registered Entity   | 1        | \$465,000          | <a href="#">View NOP</a>         | <a href="#">View Order</a>         |                                      |
| 2014-04-30 | NP14-39-000        | WECC      | Unidentified Registered Entity   | 1        | \$155,000          | <a href="#">View NOP</a>         | <a href="#">View Order</a>         |                                      |
| 2014-05-29 | NP14-41-000        | WECC      | Unidentified Registered Entity   | 1        | \$98,500           | <a href="#">View NOP</a>         | <a href="#">View Order</a>         |                                      |
| 2014-05-29 | NP14-42-000        | SERC      | Unidentified Registered Entity   | 1        | \$250,000          | <a href="#">View NOP</a>         | <a href="#">View Order</a>         |                                      |
| 2014-07-31 | NP14-45-000        | WECC      | Unidentified Registered Entity   | 1        | \$180,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2014-07-31 | NP14-46-000        | RFC       | Unidentified Registered Entities | 7        | \$50,000           | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2014-08-27 | NP14-48-000        | RFC/NPCC  | Unidentified Registered Entities | 3        | \$625,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2014-10-30 | NP15-5-000         | SPP       | Unidentified Registered Entity   | 1        | \$45,000           | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2014-10-30 | NP15-6-000         | TRE       | Unidentified Registered Entity   | 1        | \$106,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2014-11-25 | NP15-10-000        | WECC      | Unidentified Registered Entity   | 1        | \$150,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2014-11-25 | NP15-11-000        | RFC       | Unidentified Registered Entity   | 1        | \$75,000           | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2014-11-25 | NP15-9-000         | MRO       | Unidentified Registered Entity   | 1        | \$150,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2014-12-30 | NP15-13-000        | RFC       | Unidentified Registered Entity   | 1        | \$0                | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2014-12-30 | NP15-15-000        | SERC      | Unidentified Registered Entities | 2        | \$120,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2014-12-30 | NP15-17-000        | WECC      | Unidentified Registered Entity   | 1        | \$120,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2014-12-30 | NP15-18-000        | Multiple  | Unidentified Registered Entities | 10       | \$124,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         | <a href="#">View A-2 Spreadsheet</a> |
| 2015-02-26 | NP15-20-000        | SERC      | Unidentified Registered Entity   | 1        | \$70,000           | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2015-03-31 | NP15-23-000        | WECC      | Unidentified Registered Entities | 3        | \$165,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         | <a href="#">View A-2 Spreadsheet</a> |
| 2015-04-30 | NP15-24-000        | RFC       | Unidentified Registered Entity   | 1        | \$150,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2015-04-30 | NP15-26-000        | RFC       | Unidentified Registered Entity   | 1        | \$0                | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2015-08-31 | NP15-33-000        | RFC       | Unidentified Registered Entity   | 1        | \$425,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2015-10-29 | NP16-2-000         | WECC      | Unidentified Registered Entity   | 1        | \$160,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2015-12-01 | NP16-4-000         | WECC      | Unidentified Registered Entity   | 1        | \$205,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2015-12-01 | NP16-5-000         | WECC      | Unidentified Registered Entity   | 1        | \$200,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2015-12-30 | NP16-7-000         | SPP       | Unidentified Registered Entity   | 1        | \$235,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2016-01-28 | NP16-10-000        | RF        | Unidentified Registered Entity   | 1        | \$150,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2016-01-28 | NP16-9-000         | WECC      | Unidentified Registered Entity   | 1        | \$0                | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2016-02-29 | NP16-12-000        | RF        | Unidentified Registered Entity   | 1        | \$1,700,000        | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2016-04-28 | NP16-18-000        | RF / SERC | Unidentified Registered Entities | 5        | \$115,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         | <a href="#">View A-2 Spreadsheet</a> |
| 2016-05-31 | NP16-20-000        | FRCC      | Unidentified Registered Entity   | 1        | \$35,000           | <a href="#">View Filing</a>      | <a href="#">View Order</a>         | <a href="#">View A-2 Spreadsheet</a> |
| 2016-07-28 | NP16-23-000        | SERC      | Unidentified Registered Entity   | 1        | \$225,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |
| 2016-07-28 | NP16-24-000        | SERC      | Unidentified Registered Entity   | 1        | \$180,000          | <a href="#">View Filing</a>      | <a href="#">View Order</a>         |                                      |

"Unidentified Registered Entity" Dockets 2010-2018

| Date       | FERC Docket Number | Region     | Registered Entity                | Entities | Total Penalty (\$) | NOP                         | Order                       | A2 Spreadsheet                       |
|------------|--------------------|------------|----------------------------------|----------|--------------------|-----------------------------|-----------------------------|--------------------------------------|
| 2016-10-31 | NP17-2-000         | WECC       | Unidentified Registered Entity   | 1        | \$1,125,000        | <a href="#">View Filing</a> | <a href="#">View Order</a>  |                                      |
| 2016-10-31 | NP17-3-000         | WECC       | Unidentified Registered Entity   | 1        | \$250,000          | <a href="#">View Filing</a> | <a href="#">View Order</a>  |                                      |
| 2016-11-30 | NP17-8-000         | MRO        | Unidentified Registered Entity   | 1        | \$142,000          | <a href="#">View Filing</a> | <a href="#">View Order</a>  |                                      |
| 2016-12-29 | NP17-10-000        | WECC       | Unidentified Registered Entity   | 1        | \$0                | <a href="#">View Filing</a> | <a href="#">View Order</a>  |                                      |
| 2016-12-29 | NP17-11-000        | WECC       | Unidentified Registered Entity   | 1        | \$0                | <a href="#">View Filing</a> | <a href="#">View Order</a>  |                                      |
| 2016-12-29 | NP17-12-000        | WECC /SERC | Unidentified Registered Entities | 4        | \$60,000           | <a href="#">View Filing</a> | <a href="#">View Order</a>  | <a href="#">View A-2 Spreadsheet</a> |
| 2016-12-29 | NP17-13-000        | WECC       | Unidentified Registered Entity   | 1        | \$0                | <a href="#">View Filing</a> | <a href="#">View Notice</a> |                                      |
| 2017-04-27 | NP17-21-000        | WECC       | Unidentified Registered Entity   | 1        | \$201,000          | <a href="#">View Filing</a> | <a href="#">View Notice</a> |                                      |
| 2017-07-31 | NP17-25-000        | WECC       | Unidentified Registered Entity   | 1        | \$0                | <a href="#">View Filing</a> | <a href="#">View Notice</a> | <a href="#">View A-2</a>             |
| 2017-07-31 | NP17-26-000        | SPP RE     | Unidentified Registered Entity   | 1        | \$250,000          | <a href="#">View Filing</a> | <a href="#">View Notice</a> |                                      |
| 2017-09-28 | NP17-31-000        | SERC       | Unidentified Registered Entity   | 1        | \$500,000          | <a href="#">View Filing</a> | <a href="#">View Notice</a> |                                      |
| 2017-10-31 | NP18-2-000         | WECC       | Unidentified Registered Entities | 2        | \$0                | <a href="#">View Filing</a> | <a href="#">View Notice</a> | <a href="#">View A-2</a>             |
| 2018-02-28 | NP18-7-000         | WECC       | Unidentified Registered Entity   | 1        | \$2,700,000        | <a href="#">View Filing</a> | <a href="#">View Notice</a> |                                      |
| 2018-05-31 | NP18-14-000        | RF         | Unidentified Registered Entity   | 1        | \$180,000          | <a href="#">View Filing</a> | <a href="#">View Notice</a> |                                      |
| 2018-05-31 | NP18-15-000        | WECC       | Unidentified Registered Entity   | 1        | \$0                | <a href="#">View Filing</a> | <a href="#">View Notice</a> | <a href="#">View A-2</a>             |
| 2018-07-31 | NP18-21-000        | WECC       | Unidentified Registered Entity   | 1        | \$0                | <a href="#">View Filing</a> | <a href="#">View Notice</a> | <a href="#">View A-2</a>             |
| 2018-08-30 | NP18-22-000        | WECC       | Unidentified Registered Entity   | 1        | \$0                | <a href="#">View Filing</a> | <a href="#">View Notice</a> |                                      |
| 2018-09-27 | NP18-26-000        | NPCC       | Unidentified Registered Entity   | 1        | \$0                | <a href="#">View Filing</a> | <a href="#">View Notice</a> | <a href="#">View A-2</a>             |



# Grid Security Now!

Michael Mabee – Author of The Civil Defense Book

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## COVERUP UPDATE: CIP Violation Database and FOIAs

Posted on May 29, 2020 by Michael Mabee

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FOIA Lawsuit and CIP Violation Database: Exposing the NERC CIP Coverup

I created the CIP violation database to disclose to the public the identities of violators of Critical Infrastructure Protection (CIP) standards as my investigation continues. These identities have been covered up by the North American Electric Reliability Corporation ([NERC](#)) and the Federal Energy Regulatory Commission ([FERC](#)) since 2010. [[Read details of the coverup and my investigation HERE.](#)] Unfortunately, I have been forced to file a [lawsuit](#) against FERC under the Freedom of Information Act (FOIA) due to FERC's delay and denial of my FOIA requests. Details on my FOIAs and the lawsuit are all posted below.

Here is the current status of the CIP coverup and my FOIAs

|                          |                  |
|--------------------------|------------------|
| <b>Date Updated:</b>     | <b>5/29/2020</b> |
| <hr/>                    |                  |
| Total URE Dockets:       | 261              |
| <hr/>                    |                  |
| FOIAs Filed for:         | 259              |
| <hr/>                    |                  |
| Total UREs *:            | 1491             |
| <hr/>                    |                  |
| FOIA URE Names Released: | 10               |
| <hr/>                    |                  |
| FOIA URE Names Denied:   | 75               |
| <hr/>                    |                  |

\* Note: As of 2019 NERC is also hiding the number of UREs covered in spreadsheet NOPs, so we can no longer accurately determine the number of URE's involved.

**[SCROLL DOWN FOR CIP VIOLATION DATABASE!](#)**

## Background

I have filed 4 FOIA requests (so far) for the names of UREs ("Unidentified Registered Entities") which is the industry euphemism for "covered up company name." In addition, I was also forced to file a FOIA to get NERC's and the utility industry's objections to my FOIAs (ridiculous, I know). I also had to file a FOIA to disprove the electric industry's assertion that FERC has officially blessed off on withholding the names of CIP violators – and there were no responsive documents. So the industry is misrepresenting this (or lying, depending on how charitable you'd like to be).

As a result of my [December 2018 FOIA request](#), [January 2019 FOIA Request](#) and [August 2019 FOIA request](#) I will be getting the names a few at a time from FERC and will update the database as I get them. (Read [FERC's first response letter HERE.](#)) Note that I have objected to FERC's "rolling" treatment of my FOIA requests which appear to be a delay tactic to appease the industry.

As of April 28, 2020 FERC has processed only 84 of 259 dockets under my FOIA requests.



***At this rate, it will take FERC about 3 years to process my FOIAs.***

Unfortunately, I do not think this unacceptable delay is anything other than an attempt by FERC to constructively deny the FOIA. The Court agreed and on [January 28, 2020 issued an order](#) requiring FERC to process 10-15 dockets per month until production is complete.

I will continue to work in [FERC rulemaking](#) and Motions to intervene (see [HERE](#), [HERE](#), [HERE](#) and [HERE](#)) to fix this [NERC coverup](#) permanently.

It is also important to note that the *entire electric utility industry* is actively fighting these FOIAs. This is an extraordinary level of [objection](#) to disclosure of regulatory actions that the American people have the right to know about!

On January 18, 2019, Commission staff notified you, as well as the relevant UREs, of the request and provided an opportunity to comment pursuant to 18 C.F.R. § 388.112. [NERC submitted comments on January 28, 2019, objecting to the release of any Non-public NERC Full Notice of Penalty \("Non-public NOP"\)](#), as well as the identity of the UREs generally. [Additionally, a number of trade groups](#) submitted comments also objecting to disclosure of the Non-public NOPs and the URE identities. Finally, Commission staff has and is continuing to receive verbal comments from relevant UREs.

**Click for larger view**

I will only be posting the names that are confirmed. For example, you will find that in Docket NP18-7 the violator is Pacific Gas and Electric Company (PG&E). [This was confirmed by a previous FOIA I filed.](#)

The Database gives you details on all the covered up CIP violations to date and will be updated with the names of "UREs" as I receive them.

### FOIA Documents

I will post the FOIAs and all responses, disclosures, denials and appeals below.

### FOIA Lawsuit: Mabee v. Federal Energy Regulatory Commission

(NOTE: Lawsuit covers FOIAs 2019-0019, 2019-0030 and 2019-0099 below)

[Click HERE For Press Release On Lawsuit](#)

- [Document 1 - Complaint](#)
- [Document 2 - Summonses](#)
- [Document 3 - FOIA Order and Guidelines](#)
- [Document 4 - Notice of Appearance \(AUSA\)](#)
- [Document 5 - Proof of Service \(AG\)](#)
- [Document 6 - Proof of Service \(AUSA\)](#)
- [Document 7 - Proof of Service \(FERC\)](#)
- [Document 8 - Answer](#)
- [Document 9 - Joint Status Report January 13, 2020](#)
- [Court Order January 28, 2020](#)
- [Document 10 - Defendant's Monthly Status Report February 7, 2020](#)
- [Document 11 - Joint Status Report March 9, 2020](#)
- [Document 12 - Notice of Appearance \(AUSA\)](#)
- [Document 13 - Defendant's Monthly Status Report April 7, 2020](#)
- [Document 14 - Defendant's Monthly Status Report May 7, 2020](#)
- [Court Order May 11, 2020](#)

**FOIA 2019-0099** (For FERC "URE" Dockets from January-July 2019)

[Click HERE for my August 3, 2019 FOIA request to FERC](#)

[Click HERE for FERC's September 17, 2019 determination Letter \(Denial\)](#)

[Click HERE for my September 24, 2019 FOIA appeal to FERC \(2019-0099\)](#)

[Click HERE for FERC's November 7, 2019 denial of my appeal](#)

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**FOIA 2019-0019** (for FERC "URE" Dockets from 2014-2018)

[Click HERE for my December 18, 2018 FOIA request to FERC](#)

[Click HERE for FERC's January 18, 2019 "Submitter's Rights Letter."](#)

[Click HERE for NERC's January 28, 2019 objections to my FOIA](#)

[Click HERE for the electric industry Trade Associations objections to my FOIA](#)

[Click HERE for FERC's February 28, 2019 "Notice of Intent to Release" Letter](#)

[Click HERE for FERC's March 18, 2019 determination \(with disclosed documents\)](#)

[Click HERE for FERC's April 2, 2019 second determination \(denial\)](#)

[Click HERE for my April 17, 2019 FOIA appeal to FERC](#)

[Click here for NERC's April 23, 2019 objections to my FOIA](#)

[Click HERE for FERC's June 12, 2019 denial of my appeal](#)

[Click HERE for my August 3, 2019 estimated completion date request to FERC](#)

[Click HERE for my September 13, 2019 FOIA appeal to FERC \(2019-0019\)](#)

[Click HERE for FERC's October 21, 2019 denial letter](#)

[Click HERE for FERC's January 16, 2020 denial letter](#)

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**FOIA 2019-0030** (for FERC "URE" Dockets from 2010-2013)

[Click HERE for my January 12, 2019 FOIA request to FERC](#)

[Click HERE for NERC's February 15, 2019 objections to my FOIA](#)

[Click HERE for the electric industry Trade Associations objections to my FOIA](#)

[Click HERE for FERC's March 20, 2019 "Notice of Intent to Release" Letter](#)

[Click HERE for FERC's May 17, 2019 determination \(with disclosed documents\)](#)

[Click HERE for FERC's June 13, 2019 "Notice of Intent to Release" Letter](#)

[Click HERE for my August 3, 2019 estimated completion date request to FERC](#)

[Click HERE for FERC's September 3, 2019 determination \(with disclosed documents\)](#)

[Click HERE for my September 13, 2019 FOIA appeal to FERC \(2019-0030\)](#)

[Click HERE for FERC's October 25, 2019 denial letter](#)

[Click HERE for FERC's December 12, 2019 determination letter \(with disclosed documents\)](#)

[Click HERE for FERC's February 26, 2020 denial letter](#)

[Click HERE for FERC's March 30, 2020 denial letter](#)

[Click HERE for FERC's April 28, 2020 denial letter](#)

[Click HERE for FERC's May 19, 2020 "Notice of Intent to Release" Letter](#)

[Click HERE for FERC's May 27, 2020 denial letter](#)

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**FOIA 2019-0056** (FOIA for the objections to my FOIAs)

[Click HERE for my March 15, 2019 FOIA to get the objections to my previous FOIAs](#)

[Click HERE for FERC's April 26, 2019 "Notice of Intent to Release" Letter](#)

[Click HERE for FERC's May 17, 2019 determination \(with disclosed documents\)](#)

[Click HERE for Trade Associations objections to my FOIAs \(Filed with Docket NP19-4-000\)](#)

**FOIA 2019-0061** (For alleged "agreement" between FERC and NERC)

[Click HERE for my FOIA for the alleged "agreement" between FERC and NERC to withhold identities](#)

[Click HERE for FERC's Response \(no responsive documents - in other words, the industry lied\)](#)

**FOIA 2018-0075** (for FERC Docket NP18-7-000)

[Click HERE for my April 13, 2018 FOIA request to FERC](#)

[Click HERE for FERC's May 25, 2018 denial letter](#)

[Click HERE for my June 16, 2018 FOIA appeal to FERC](#)

[Click HERE for August 2, 2018 letter from FERC](#)

[Click HERE for August 24, 2018 letter and disclosed documents from FERC](#)

**FOIA 2020-0043** (For FERC "URE" Dockets from August-December 2019)

[Click HERE for my January 1, 2020 FOIA Request to FERC](#)

[Click HERE for FERC's February 19, 2020 denial letter](#)

[Click HERE for my May 3, 2020 Appeal in FOIA 2020-0043](#)

## CIP Violation Database

Show  entries

Search:

| Date     | FERC Docket Number           | Region | Registered Entity             | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y Denied=N |
|----------|------------------------------|--------|-------------------------------|----------|--------------------|-----------|----------------------|
| 7/6/2010 | <a href="#">NP10-130-000</a> | SERC   | South Carolina Electric & Gas | 1        | \$0                | 2019-0030 | Y                    |
| 7/6/2010 | <a href="#">NP10-131-000</a> | SERC   | Progress Energy Carolinas     | 1        | \$5,000            | 2019-0030 | Y                    |
| 7/6/2010 | <a href="#">NP10-137-000</a> | WECC   | Tuscon Electric Power         | 1        | \$39,000           | 2019-0030 | Y                    |
| 7/6/2010 | <a href="#">NP10-138-000</a> | RFC    | Duke Energy Co.               | 1        | \$5,000            | 2019-0030 | Y                    |
| 7/6/2010 | <a href="#">NP10-139-000</a> | WECC   | Sunray Energy, Inc.           | 1        | \$3,000            | 2019-0030 | Y                    |

| Date      | FERC Docket Number           | Region   | Registered Entity                 | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|-----------|------------------------------|----------|-----------------------------------|----------|--------------------|-----------|-------------------------|
| 7/6/2010  | <a href="#">NP10-140-000</a> | RFC      | PJM                               | 1        | \$5,600            | 2019-0030 | Y                       |
| 7/6/2010  | <a href="#">NP10-134-000</a> | SPP      | Southwestern Power Administration | 1        | 0                  | 2019-0030 | Y                       |
| 2/27/2014 | <a href="#">NP14-32-000</a>  | SPP RE   | City Utilities of Springfield, MO | 1        | 0                  | 2019-0019 | Y                       |
| 5/29/2014 | <a href="#">NP14-41-000</a>  | WECC     | Pacific Gas and Electric Company  | 1        | \$98,500           | 2019-0019 | Y                       |
| 2/28/2018 | <a href="#">NP18-7-000</a>   | WECC     | Pacific Gas and Electric Company  | 1        | \$2,700,000        | 2018-0075 | Y                       |
| 1/25/2019 | <a href="#">NP19-4-000</a>   | XXX      | Unidentified Registered Entity    | 1        | \$10,000,000       | 2019-0099 | N                       |
| 2/28/2019 | <a href="#">NP19-5-000</a>   | FRCC/SPP | Unidentified Registered Entities  | 3        | 0                  | 2019-0099 | N                       |
| 3/28/2019 | <a href="#">NP19-6-000</a>   | WECC     | Unidentified Registered Entities  | 6        | 0                  | 2019-0099 | N                       |
| 4/30/2019 | <a href="#">NP19-7-000</a>   | WECC     | Unidentified Registered Entity    | 1        | 0                  | 2019-0099 | N                       |
| 4/30/2019 | <a href="#">NP19-9-000</a>   | FRCC     | Unidentified Registered Entity    | 1        | \$301,000          | 2019-0099 | N                       |
| 5/30/2019 | <a href="#">NP19-10-000</a>  | XXX      | Unidentified Registered Entity    | 1        | \$1,000,000        | 2019-0099 | N                       |
| 5/30/2019 | <a href="#">NP19-11-000</a>  | XXX      | Unidentified Registered Entity    | 1        | \$1,000,000        | 2019-0099 | N                       |

| Date       | FERC Docket Number          | Region    | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|------------|-----------------------------|-----------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 6/27/2019  | <a href="#">NP19-12-000</a> | NPCC/WECC | Unidentified Registered Entities | 2        | \$87,000           | 2019-0099 | N                       |
| 6/26/2019  | <a href="#">NP19-14-000</a> | SERC      | Unidentified Registered Entity   | 1        | \$775,000          | 2019-0099 | N                       |
| 7/21/2019  | <a href="#">NP19-15-000</a> | NPCC/WECC | Unidentified Registered Entities | 2        | \$164,000          | 2019-0099 | N                       |
| 1/30/2014  | <a href="#">NP14-30-000</a> | RFC       | Unidentified Registered Entity   | 1        | \$75,000           | 2019-0019 | N                       |
| 3/31/2014  | <a href="#">NP14-37-000</a> | WECC      | Unidentified Registered Entity   | 1        | \$465,000          | 2019-0019 | N                       |
| 4/30/2014  | <a href="#">NP14-39-000</a> | WECC      | Unidentified Registered Entity   | 1        | \$155,000          | 2019-0019 | N                       |
| 5/29/2014  | <a href="#">NP14-42-000</a> | SERC      | Unidentified Registered Entity   | 1        | \$250,000          | 2019-0019 | N                       |
| 7/31/2014  | <a href="#">NP14-45-000</a> | WECC      | Unidentified Registered Entity   | 1        | \$180,000          | 2019-0019 | N                       |
| 7/31/2014  | <a href="#">NP14-46-000</a> | RFC       | Unidentified Registered Entities | 7        | \$50,000           | 2019-0019 | N                       |
| 8/27/2014  | <a href="#">NP14-48-000</a> | RFC/NPCC  | Unidentified Registered Entities | 3        | \$625,000          | 2019-0019 | N                       |
| 12/30/2014 | <a href="#">NP15-13-000</a> | RFC       | Unidentified Registered Entity   | 1        | 0                  | 2019-0019 | N                       |

| Date       | FERC Docket Number          | Region   | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|------------|-----------------------------|----------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 12/30/2014 | <a href="#">NP15-15-000</a> | SERC     | Unidentified Registered Entities | 2        | \$120,000          | 2019-0019 | N                       |
| 12/30/2014 | <a href="#">NP15-17-000</a> | WECC     | Unidentified Registered Entity   | 1        | \$120,000          | 2019-0019 | N                       |
| 2/26/2015  | <a href="#">NP15-20-000</a> | SERC     | Unidentified Registered Entity   | 1        | \$70,000           | 2019-0019 | N                       |
| 4/30/2015  | <a href="#">NP15-24-000</a> | RFC      | Unidentified Registered Entity   | 1        | \$150,000          | 2019-0019 | N                       |
| 4/30/2015  | <a href="#">NP15-26-000</a> | RFC      | Unidentified Registered Entity   | 1        | 0                  | 2019-0019 | N                       |
| 8/31/2015  | <a href="#">NP15-33-000</a> | RFC      | Unidentified Registered Entity   | 1        | \$425,000          | 2019-0019 | N                       |
| 10/29/2015 | <a href="#">NP16-2-000</a>  | WECC     | Unidentified Registered Entity   | 1        | \$160,000          | 2019-0019 | N                       |
| 12/1/2015  | <a href="#">NP16-4-000</a>  | WECC     | Unidentified Registered Entity   | 1        | \$205,000          | 2019-0019 | N                       |
| 8/29/2019  | <a href="#">NP19-16-000</a> | WECC     | Unidentified Registered Entity   | 1        | \$2,100,00         | 2020-0043 | N                       |
| 8/29/2019  | <a href="#">NP19-17-000</a> | MRO      | Unidentified Registered Entities | 1        | 0                  | 2020-0043 | N                       |
| 9/26/2019  | <a href="#">NP19-18-000</a> | Texas RE | Unidentified Registered Entity   | 1        | 0                  | 2020-0043 | N                       |

| Date       | FERC Docket Number          | Region  | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|------------|-----------------------------|---------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 10/31/2019 | <a href="#">NP20-2-000</a>  | WECC    | Unidentified Registered Entity   | 1        | \$378,000          | 2020-0043 | N                       |
| 10/31/2019 | <a href="#">NP20-3-000</a>  | NPCC    | Unidentified Registered Entities | 1        | \$84,000           | 2020-0043 | N                       |
| 12/30/2019 | <a href="#">NP20-6-000</a>  | WECC/RF | Unidentified Registered Entities | 1        | \$175,000          | 2020-0043 | N                       |
| 10/7/2010  | <a href="#">NP11-2-000</a>  | WECC    | Unidentified Registered Entity   | 1        | \$9,000            | 2019-0030 | N                       |
| 12/30/2013 | <a href="#">NP14-16-000</a> | SERC    | Unidentified Registered Entity   | 1        | \$50,000           | 2019-0030 | N                       |
| 12/30/2013 | <a href="#">NP14-17-000</a> | WECC    | Unidentified Registered Entity   | 1        | \$144,000          | 2019-0030 | N                       |
| 12/30/2013 | <a href="#">NP14-18-000</a> | SERC    | Unidentified Registered Entity   | 1        | \$110,000          | 2019-0030 | N                       |
| 12/30/2013 | <a href="#">NP14-19-000</a> | WECC    | Unidentified Registered Entity   | 1        | \$185,000          | 2019-0030 | N                       |
| 12/30/2013 | <a href="#">NP14-20-000</a> | SERC    | Unidentified Registered Entity   | 1        | \$198,000          | 2019-0030 | N                       |
| 12/31/2013 | <a href="#">NP14-21-000</a> | SERC    | Unidentified Registered Entity   | 1        | \$175,000          | 2019-0030 | N                       |
| 12/30/2013 | <a href="#">NP14-22-000</a> | WECC    | Unidentified Registered Entity   | 1        | \$150,000          | 2019-0030 | N                       |

| Date       | FERC Docket Number          | Region | Registered Entity              | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|------------|-----------------------------|--------|--------------------------------|----------|--------------------|-----------|-------------------------|
| 12/31/2013 | <a href="#">NP14-23-000</a> | SPP RE | Unidentified Registered Entity | 1        | \$100,000          | 2019-0030 | N                       |
| 12/31/2013 | <a href="#">NP14-24-000</a> | SERC   | Unidentified Registered Entity | 1        | \$350,000          | 2019-0030 | N                       |
| 12/31/2013 | <a href="#">NP14-25-000</a> | SERC   | Unidentified Registered Entity | 1        | \$250,000          | 2019-0030 | N                       |
| 12/31/2013 | <a href="#">NP14-26-000</a> | SERC   | Unidentified Registered Entity | 1        | \$120,000          | 2019-0030 | N                       |
| 11/5/2010  | <a href="#">NP11-21-000</a> | RFC    | Unidentified Registered Entity | 1        | \$8,000            | 2019-0030 | N                       |
| 11/5/2010  | <a href="#">NP11-22-000</a> | SERC   | Unidentified Registered Entity | 1        | \$5,000            | 2019-0030 | N                       |
| 11/30/2010 | <a href="#">NP11-56-000</a> | SERC   | Unidentified Registered Entity | 1        | \$0                | 2019-0030 | N                       |
| 12/22/2010 | <a href="#">NP11-59-000</a> | RFC    | Unidentified Registered Entity | 1        | \$7,000            | 2019-0030 | N                       |
| 12/22/2010 | <a href="#">NP11-63-000</a> | WECC   | Unidentified Registered Entity | 1        | \$80,000           | 2019-0030 | N                       |
| 12/22/2010 | <a href="#">NP11-64-000</a> | WECC   | Unidentified Registered Entity | 1        | \$38,500           | 2019-0030 | N                       |
| 12/22/2010 | <a href="#">NP11-70-000</a> | WECC   | Unidentified Registered Entity | 1        | \$55,000           | 2019-0030 | N                       |



| Date       | FERC Docket Number           | Region   | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|------------|------------------------------|----------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 12/22/2010 | <a href="#">NP11-72-000</a>  | SERC     | Unidentified Registered Entity   | 1        | \$2,000            | 2019-0030 | N                       |
| 12/22/2010 | <a href="#">NP11-76-000</a>  | SERC     | Unidentified Registered Entity   | 1        | 0                  | 2019-0030 | N                       |
| 12/22/2010 | <a href="#">NP11-79-000</a>  | FRCC     | Unidentified Registered Entity   | 1        | \$100,000          | 2019-0030 | N                       |
| 12/22/2010 | <a href="#">NP11-81-000</a>  | MRO, SPP | Unidentified Registered Entities | 2        | \$50,000           | 2019-0030 | N                       |
| 1/31/2011  | <a href="#">NP11-98-000</a>  | WECC     | Unidentified Registered Entity   | 1        | \$5,000            | 2019-0030 | N                       |
| 1/31/2011  | <a href="#">NP11-102-000</a> | WECC     | Unidentified Registered Entity   | 1        | \$6,500            | 2019-0030 | N                       |
| 2/23/2011  | <a href="#">NP11-106-000</a> | RFC      | Unidentified Registered Entity   | 1        | \$15,000           | 2019-0030 | N                       |
| 2/23/2011  | <a href="#">NP11-111-000</a> | MRO      | Unidentified Registered Entity   | 1        | \$120,000          | 2019-0030 | N                       |
| 2/23/2011  | <a href="#">NP11-116-000</a> | FRCC     | Unidentified Registered Entity   | 1        | \$75,000           | 2019-0030 | N                       |
| 2/23/2011  | <a href="#">NP11-124-000</a> | RFC      | Unidentified Registered Entity   | 1        | \$100,000          | 2019-0030 | N                       |
| 2/23/2011  | <a href="#">NP11-125-000</a> | SPP, RFC | Unidentified Registered Entity   | 1        | \$77,000           | 2019-0030 | N                       |

| Date      | FERC Docket Number           | Region | Registered Entity              | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|-----------|------------------------------|--------|--------------------------------|----------|--------------------|-----------|-------------------------|
| 2/23/2011 | <a href="#">NP11-127-000</a> | FRCC   | Unidentified Registered Entity | 1        | \$55,000           | 2019-0030 | N                       |
| 2/23/2011 | <a href="#">NP11-128-000</a> | WECC   | Unidentified Registered Entity | 1        | \$450,000          | 2019-0030 | N                       |
| 3/30/2011 | <a href="#">NP11-143-000</a> | SERC   | Unidentified Registered Entity | 1        | \$5,000            | 2019-0030 | N                       |
| 3/30/2011 | NP11-136-000                 | WECC   | Unidentified Registered Entity | 1        | \$14,500           | 2019-0030 | N                       |
| 3/30/2011 | NP11-137-000                 | WECC   | Unidentified Registered Entity | 1        | \$106,000          | 2019-0030 | N                       |
| 3/30/2011 | NP11-140-000                 | WECC   | Unidentified Registered Entity | 1        | \$27,000           | 2019-0030 | N                       |
| 3/30/2011 | NP11-145-000                 | WECC   | Unidentified Registered Entity | 1        | \$13,000           | 2019-0030 | N                       |
| 3/30/2011 | NP11-150-000                 | MRO    | Unidentified Registered Entity | 1        | 0                  | 2019-0030 | N                       |
| 3/30/2011 | NP11-156-000                 | SERC   | Unidentified Registered Entity | 1        | \$12,500           | 2019-0030 | N                       |
| 3/30/2011 | NP11-157-000                 | SERC   | Unidentified Registered Entity | 1        | \$7,000            | 2019-0030 | N                       |
| 3/30/2011 | NP11-161-000                 | WECC   | Unidentified Registered Entity | 1        | \$35,000           | 2019-0030 | N                       |

| Date       | FERC Docket Number | Region   | Registered Entity              | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|------------|--------------------|----------|--------------------------------|----------|--------------------|-----------|-------------------------|
| 4/29/2011  | NP11-166-000       | SPP, TRE | Unidentified Registered Entity | 1        | \$50,000           | 2019-0030 | N                       |
| 4/29/2011  | NP11-167-000       | WECC     | Unidentified Registered Entity | 1        | \$89,000           | 2019-0030 | N                       |
| 7/6/2010   | NP10-135-000       | WECC     | Unidentified Registered Entity | 1        | \$8,000            | 2019-0030 |                         |
| 7/6/2010   | NP10-136-000       | WECC     | Unidentified Registered Entity | 1        | \$7,000            | 2019-0030 |                         |
| 7/30/2010  | NP10-159-000       | WECC     | Unidentified Registered Entity | 1        | \$109,000          | 2019-0030 |                         |
| 9/13/2010  | NP10-160-000       | WECC     | Unidentified Registered Entity | 1        | 0                  | 2019-0030 |                         |
| 10/7/2010  | NP11-1-000         | WECC     | Unidentified Registered Entity | 1        | \$106,000          | 2019-0030 |                         |
| 10/7/2010  | NP11-3-000         | SERC     | Unidentified Registered Entity | 1        | \$6,000            | 2019-0030 |                         |
| 10/7/2010  | NP11-4-000         | FRCC     | Unidentified Registered Entity | 1        | \$250,000          | 2019-0030 |                         |
| 10/7/2010  | NP11-5-000         | SERC     | Unidentified Registered Entity | 1        | \$16,000           | 2019-0030 |                         |
| 11/30/2010 | NP11-47-000        | SERC     | Unidentified Registered Entity | 1        | \$0                | 2019-0030 |                         |

| Date      | FERC Docket Number | Region    | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|-----------|--------------------|-----------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 2/1/2011  | NP11-104-000       | Various   | Unidentified Registered Entities | 6        | \$9,300            | 2019-0030 |                         |
| 2/28/2011 | NP11-133-000       | Various   | Unidentified Registered Entities | 5        | \$11,500           | 2019-0030 |                         |
| 3/30/2011 | NP11-146-000       | RFC       | Unidentified Registered Entities | 3        | \$52,500           | 2019-0030 |                         |
| 3/30/2011 | NP11-149-000       | RFC       | Unidentified Registered Entity   | 1        | \$20,000           | 2019-0030 |                         |
| 3/30/2011 | NP11-155-000       | WECC      | Unidentified Registered Entity   | 1        | \$2,000            | 2019-0030 |                         |
| 3/31/2011 | NP11-162-000       | TRE, NPCC | Unidentified Registered Entities | 2        | \$10,500           | 2019-0030 |                         |
| 4/29/2011 | NP11-174-000       | RFC       | Unidentified Registered Entity   | 1        | \$15,000           | 2019-0030 |                         |
| 4/29/2011 | NP11-175-000       | WECC      | Unidentified Registered Entity   | 1        | \$32,000           | 2019-0030 |                         |
| 4/29/2011 | NP11-176-000       | WECC      | Unidentified Registered Entity   | 1        | \$80,000           | 2019-0030 |                         |
| 4/29/2011 | NP11-178-000       | WECC      | Unidentified Registered Entity   | 1        | \$35,000           | 2019-0030 |                         |
| 4/29/2011 | NP11-179-000       | MRO       | Unidentified Registered Entity   | 1        | \$10,000           | 2019-0030 |                         |

| Date      | FERC Docket Number | Region     | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|-----------|--------------------|------------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 4/29/2011 | NP11-180-000       | WECC       | Unidentified Registered Entity   | 1        | \$71,500           | 2019-0030 |                         |
| 4/29/2011 | NP11-181-000       | FRCC, NPCC | Unidentified Registered Entities | 6        | \$39,500           | 2019-0030 |                         |
| 5/26/2011 | NP11-182-000       | WECC       | Unidentified Registered Entity   | 1        | \$59,000           | 2019-0030 |                         |
| 5/26/2011 | NP11-184-000       | RFC        | Unidentified Registered Entity   | 1        | \$70,000           | 2019-0030 |                         |
| 5/26/2011 | NP11-188-000       | SPP        | Unidentified Registered Entity   | 1        | \$16,860           | 2019-0030 |                         |
| 5/26/2011 | NP11-189-000       | FRCC       | Unidentified Registered Entity   | 1        | \$17,000           | 2019-0030 |                         |
| 5/26/2011 | NP11-192-000       | WECC       | Unidentified Registered Entity   | 1        | \$12,200           | 2019-0030 |                         |
| 5/26/2011 | NP11-193-000       | WECC       | Unidentified Registered Entity   | 1        | \$60,000           | 2019-0030 |                         |
| 5/26/2011 | NP11-198-000       | SPP        | Unidentified Registered Entity   | 1        | \$17,860           | 2019-0030 |                         |
| 5/26/2011 | NP11-199-000       | Various    | Unidentified Registered Entities | 3        | \$3,500            | 2019-0030 |                         |
| 6/29/2011 | NP11-204-000       | WECC       | Unidentified Registered Entity   | 1        | \$37,500           | 2019-0030 |                         |

| Date      | FERC Docket Number | Region | Registered Entity              | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|-----------|--------------------|--------|--------------------------------|----------|--------------------|-----------|-------------------------|
| 6/29/2011 | NP11-205-000       | WECC   | Unidentified Registered Entity | 1        | \$22,000           | 2019-0030 |                         |
| 6/29/2011 | NP11-206-000       | NPCC   | Unidentified Registered Entity | 3        | \$80,000           | 2019-0030 |                         |
| 6/29/2011 | NP11-211-000       | WECC   | Unidentified Registered Entity | 1        | \$14,000           | 2019-0030 |                         |
| 6/29/2011 | NP11-212-000       | WECC   | Unidentified Registered Entity | 1        | 381600             | 2019-0030 |                         |
| 6/29/2011 | NP11-213-000       | WECC   | Unidentified Registered Entity | 1        | \$143,500          | 2019-0030 |                         |
| 6/29/2011 | NP11-218-000       | WECC   | Unidentified Registered Entity | 1        | \$130,000          | 2019-0030 |                         |
| 6/29/2011 | NP11-223-000       | SPP    | Unidentified Registered Entity | 1        | \$30,000           | 2019-0030 |                         |
| 6/29/2011 | NP11-225-000       | RFC    | Unidentified Registered Entity | 1        | \$10,000           | 2019-0030 |                         |
| 6/29/2011 | NP11-226-000       | RFC    | Unidentified Registered Entity | 1        | \$85,000           | 2019-0030 |                         |
| 7/28/2011 | NP11-229-000       | WECC   | Unidentified Registered Entity | 1        | \$75,000           | 2019-0030 |                         |
| 7/28/2011 | NP11-230-000       | RFC    | Unidentified Registered Entity | 1        | \$18,000           | 2019-0030 |                         |

| Date      | FERC Docket Number | Region  | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|-----------|--------------------|---------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 7/28/2011 | NP11-233-000       | WECC    | Unidentified Registered Entity   | 1        | \$70,000           | 2019-0030 |                         |
| 7/28/2011 | NP11-234-000       | WECC    | Unidentified Registered Entity   | 1        | \$35,000           | 2019-0030 |                         |
| 7/28/2011 | NP11-237-000       | RFC     | Unidentified Registered Entity   | 3        | \$180,000          | 2019-0030 |                         |
| 7/28/2011 | NP11-243-000       | RFC     | Unidentified Registered Entity   | 1        | \$20,000           | 2019-0030 |                         |
| 7/28/2011 | NP11-247-000       | RFC     | Unidentified Registered Entity   | 1        | \$15,000           | 2019-0030 |                         |
| 7/28/2011 | NP11-248-000       | WECC    | Unidentified Registered Entity   | 1        | \$5,000            | 2019-0030 |                         |
| 7/28/2011 | NP11-249-000       | WECC    | Unidentified Registered Entity   | 1        | \$18,000           | 2019-0030 |                         |
| 7/28/2011 | NP11-250-000       | WECC    | Unidentified Registered Entity   | 1        | \$12,600           | 2019-0030 |                         |
| 7/28/2011 | NP11-251-000       | WECC    | Unidentified Registered Entity   | 1        | \$7,000            | 2019-0030 |                         |
| 7/29/2011 | NP11-253-000       | Various | Unidentified Registered Entities | 8        | \$26,500           | 2019-0030 |                         |
| 8/31/2011 | NP11-261-000       | RFC     | Unidentified Registered Entity   | 1        | \$70,000           | 2019-0030 |                         |

| Date       | FERC Docket Number | Region   | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|------------|--------------------|----------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 8/31/2011  | NP11-262-000       | SPP      | Unidentified Registered Entity   | 1        | \$12,000           | 2019-0030 |                         |
| 8/31/2011  | NP11-263-000       | TRE      | Unidentified Registered Entity   | 1        | \$11,000           | 2019-0030 |                         |
| 8/31/2011  | NP11-264-000       | SPP      | Unidentified Registered Entity   | 1        | \$8,000            | 2019-0030 |                         |
| 8/31/2011  | NP11-266-000       | Various  | Unidentified Registered Entities | 5        | \$63,500           | 2019-0030 |                         |
| 9/30/2011  | NP11-269-000       | WECC     | Unidentified Registered Entity   | 1        | \$225,000          | 2019-0030 |                         |
| 9/30/2011  | NP11-270-000       | Various  | Unidentified Registered Entities | 21       | \$193,900          | 2019-0030 |                         |
| 10/31/2011 | NP12-1-000         | RF       | Unidentified Registered Entities | 3        | \$275,000          | 2019-0030 |                         |
| 10/31/2011 | NP12-2-000         | Various  | Unidentified Registered Entities | 16       | \$184,200          | 2019-0030 |                         |
| 11/30/2011 | NP12-3-000         | WECC     | Unidentified Registered Entity   | 1        | \$125,000          | 2019-0030 |                         |
| 11/30/2011 | NP12-4-000         | WECC     | Unidentified Registered Entity   | 1        | \$160,000          | 2019-0030 |                         |
| 11/30/2011 | NP12-5-000         | RF, WECC | Unidentified Registered Entities | 12       | \$89,000           | 2019-0030 |                         |



| Date       | FERC Docket Number | Region  | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|------------|--------------------|---------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 12/30/2011 | NP12-9-000         | RFC     | Unidentified Registered Entity   | 1        | \$60,000           | 2019-0030 |                         |
| 12/30/2011 | NP12-10-000        | Various | Unidentified Registered Entities | 21       | \$109,600          | 2019-0030 |                         |
| 1/31/2012  | NP12-11-000        | WECC    | Unidentified Registered Entity   | 1        | \$135,000          | 2019-0030 |                         |
| 1/31/2012  | NP12-12-000        | Various | Unidentified Registered Entities | 18       | \$160,500          | 2019-0030 |                         |
| 2/29/2012  | NP12-16-000        | WECC    | Unidentified Registered Entity   | 1        | \$80,000           | 2019-0030 |                         |
| 2/29/2012  | NP12-17-000        | SPP RE  | Unidentified Registered Entity   | 1        | \$40,000           | 2019-0030 |                         |
| 2/29/2012  | NP12-18-000        | Various | Unidentified Registered Entities | 23       | \$222,900          | 2019-0030 |                         |
| 3/20/2012  | NP12-20-000        | WECC    | Unidentified Registered Entity   | 1        | \$60,000           | 2019-0030 |                         |
| 3/30/2012  | NP12-22-000        | Various | Unidentified Registered Entities | 15       | \$42,000           | 2019-0030 |                         |
| 4/30/2012  | NP12-25-000        | RFC     | Unidentified Registered Entity   | 1        | \$115,000          | 2019-0030 |                         |
| 4/30/2012  | NP12-26-000        | Various | Unidentified Registered Entities | 18       | \$95,300           | 2019-0030 |                         |

| Date      | FERC Docket Number | Region  | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|-----------|--------------------|---------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 5/30/2012 | NP12-27-000        | Various | Unidentified Registered Entities | 20       | \$48,600           | 2019-0030 |                         |
| 5/30/2012 | NP12-29-000        | WECC    | Unidentified Registered Entity   | 1        | \$16,2200          | 2019-0030 |                         |
| 6/29/2012 | NP12-36-000        | Various | Unidentified Registered Entities | 15       | \$121,900          | 2019-0030 |                         |
| 7/31/2012 | NP12-37-000        | WECC    | Unidentified Registered Entities | 4        | \$134,350          | 2019-0030 |                         |
| 7/31/2012 | NP12-38-000        | WECC    | Unidentified Registered Entity   | 1        | \$72,000           | 2019-0030 |                         |
| 7/31/2012 | NP12-40-000        | Various | Unidentified Registered Entities | 15       | \$101,100          | 2019-0030 |                         |
| 8/31/2012 | NP12-43-000        | WECC    | Unidentified Registered Entity   | 1        | \$70,000           | 2019-0030 |                         |
| 8/31/2012 | NP12-44-000        | Various | Unidentified Registered Entities | 16       | \$182,800          | 2019-0030 |                         |
| 9/28/2012 | NP12-45-000        | FRCC    | Unidentified Registered Entity   | 1        | \$150,000          | 2019-0030 |                         |
| 9/28/2012 | NP12-46-000        | WECC    | Unidentified Registered Entity   | 1        | \$200,000          | 2019-0030 |                         |
| 9/28/2012 | NP12-47-000        | Various | Unidentified Registered Entities | 14       | \$113,400          | 2019-0030 |                         |

| Date       | FERC Docket Number | Region  | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|------------|--------------------|---------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 10/31/2012 | NP13-1-000         | WECC    | Unidentified Registered Entity   | 1        | \$200,000          | 2019-0030 |                         |
| 10/31/2012 | NP13-4-000         | RFC     | Unidentified Registered Entities | 3        | \$725,000          | 2019-0030 |                         |
| 10/31/2012 | NP13-5-000         | Various | Unidentified Registered Entities | 19       | \$216,000          | 2019-0030 |                         |
| 11/30/2012 | NP13-6-000         | WECC    | Unidentified Registered Entity   | 1        | \$62,500           | 2019-0030 |                         |
| 12/31/2012 | NP13-11-000        | SPP     | Unidentified Registered Entity   | 1        | \$107,000          | 2019-0030 |                         |
| 12/31/2012 | NP13-12-000        | Various | Unidentified Registered Entities | 21       | \$214,000          | 2019-0030 |                         |
| 12/31/2012 | NP13-16-000        | WECC    | Unidentified Registered Entity   | 1        | \$207,000          | 2019-0030 |                         |
| 12/31/2012 | NP13-17-000        | RFC     | Unidentified Registered Entities | 3        | \$80,000           | 2019-0030 |                         |
| 12/31/2012 | NP13-18-000        | SPP     | Unidentified Registered Entity   | 1        | \$153,000          | 2019-0030 |                         |
| 12/31/2012 | NP13-19-000        | SERC    | Unidentified Registered Entity   | 1        | \$950,000          | 2019-0030 |                         |
| 1/31/2013  | NP13-22-000        | WECC    | Unidentified Registered Entity   | 1        | \$115,000          | 2019-0030 |                         |

| Date      | FERC Docket Number | Region   | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|-----------|--------------------|----------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 1/31/2013 | NP13-23-000        | Various  | Unidentified Registered Entities | 22       | \$73,000           | 2019-0030 |                         |
| 2/28/2013 | NP13-27-000        | Various  | Unidentified Registered Entities | 14       | \$53,000           | 2019-0030 |                         |
| 3/27/2013 | NP13-28-000        | Various  | Unidentified Registered Entity   | 1        | \$90,000           | 2019-0030 |                         |
| 3/27/2013 | NP13-29-000        | Various  | Unidentified Registered Entities | 10       | \$80,000           | 2019-0030 |                         |
| 4/30/2013 | NP13-32-000        | NERC     | Unidentified Registered Entity   | 1        | \$40,000           | 2019-0030 |                         |
| 4/30/2013 | NP13-33-000        | Various  | Unidentified Registered Entities | 18       | \$315,250          | 2019-0030 |                         |
| 5/30/2013 | NP13-34-000        | Texas RE | Unidentified Registered Entity   | 1        | \$137,000          | 2019-0030 |                         |
| 5/30/2013 | NP13-38-000        | WECC     | Unidentified Registered Entity   | 1        | \$291,000          | 2019-0030 |                         |
| 5/30/2013 | NP13-39-000        | Various  | Unidentified Registered Entities | 16       | \$67,500           | 2019-0030 |                         |
| 6/27/2013 | NP13-41-000        | Various  | Unidentified Registered Entities | 20       | \$198,000          | 2019-0030 |                         |
| 7/31/2013 | NP13-45-000        | WECC     | Unidentified Registered Entity   | 1        | \$198,000          | 2019-0030 |                         |

| Date       | FERC Docket Number | Region    | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|------------|--------------------|-----------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 7/31/2013  | NP13-46-000        | Various   | Unidentified Registered Entities | 18       | \$112,000          | 2019-0030 |                         |
| 7/31/2013  | NP13-47-000        | RFC, SERC | Unidentified Registered Entities | 2        | \$350,000          | 2019-0030 |                         |
| 8/30/2013  | NP13-51-000        | Various   | Unidentified Registered Entities | 18       | \$98,000           | 2019-0030 |                         |
| 9/30/2013  | NP13-55-000        | WECC      | Unidentified Registered Entity   | 1        | \$150,000          | 2019-0030 |                         |
| 9/30/2013  | NP13-57-000        | Various   | Unidentified Registered Entities | 12       | \$189,000          | 2019-0030 |                         |
| 10/30/2013 | NP14-4-000         | RF, SERC  | Unidentified Registered Entities | 16       | \$55,000           | 2019-0030 |                         |
| 10/30/2013 | NP14-5-000         | RFC       | Unidentified Registered Entity   | 1        | 0                  | 2019-0030 |                         |
| 11/27/2013 | NP14-6-000         | Various   | Unidentified Registered Entities | 14       | \$142,000          | 2019-0030 |                         |
| 12/30/2013 | NP14-14-000        | Various   | Unidentified Registered Entities | 18       | \$276,500          | 2019-0030 |                         |
| 2/28/2013  | NP13-24-000        | WECC      | Unidentified Registered Entity   | 3        | \$151,500          | 2019-0030 |                         |
| 3/27/2013  | NP13-30-000        | RFC       | Unidentified Registered Entity   | 3        | \$120,000          | 2019-0030 |                         |

| Date       | FERC Docket Number | Region  | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|------------|--------------------|---------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 9/30/2011  | RC11-6-000         | Various | Unidentified Registered Entities | 59       | 0                  | 2019-0030 |                         |
| 10/31/2011 | RC12-1-000         | Various | Unidentified Registered Entities | 33       | 0                  | 2019-0030 |                         |
| 11/30/2011 | RC12-2-000         | Various | Unidentified Registered Entities | 30       | 0                  | 2019-0030 |                         |
| 12/30/2011 | RC12-6-000         | Various | Unidentified Registered Entities | 40       | 0                  | 2019-0030 |                         |
| 1/31/2012  | RC12-7-000         | Various | Unidentified Registered Entities | 30       | 0                  | 2019-0030 |                         |
| 2/29/2012  | RC12-8-000         | Various | Unidentified Registered Entities | 24       | 0                  | 2019-0030 |                         |
| 3/30/2012  | RC12-10-000        | Various | Unidentified Registered Entities | 12       | 0                  | 2019-0030 |                         |
| 4/30/2012  | RC12-11-000        | Various | Unidentified Registered Entities | 18       | 0                  | 2019-0030 |                         |
| 5/30/2012  | RC12-12-000        | Various | Unidentified Registered Entities | 40       | 0                  | 2019-0030 |                         |
| 6/29/2012  | RC12-13-000        | Various | Unidentified Registered Entities | 40       | 0                  | 2019-0030 |                         |
| 7/31/2012  | RC12-14-000        | Various | Unidentified Registered Entities | 30       | 0                  | 2019-0030 |                         |

| Date       | FERC Docket Number | Region  | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|------------|--------------------|---------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 8/31/2012  | RC12-15-000        | Various | Unidentified Registered Entities | 38       | 0                  | 2019-0030 |                         |
| 9/28/2012  | RC12-16-000        | Various | Unidentified Registered Entities | 41       | 0                  | 2019-0030 |                         |
| 10/31/2012 | RC13-1-000         | Various | Unidentified Registered Entities | 44       | 0                  | 2019-0030 |                         |
| 11/30/2012 | RC13-2-000         | Various | Unidentified Registered Entities | 25       | 0                  | 2019-0030 |                         |
| 12/31/2012 | RC13-3-000         | Various | Unidentified Registered Entities | 25       | 0                  | 2019-0030 |                         |
| 1/31/2013  | RC13-5-000         | Various | Unidentified Registered Entities | 22       | 0                  | 2019-0030 |                         |
| 2/28/2013  | RC13-6-000         | Various | Unidentified Registered Entities | 27       | 0                  | 2019-0030 |                         |
| 4/30/2013  | RC13-8-000         | Various | Unidentified Registered Entities | 50       | 0                  | 2019-0030 |                         |
| 5/30/2013  | RC13-9-000         | Various | Unidentified Registered Entities | 53       | 0                  | 2019-0030 |                         |
| 6/27/2013  | RC13-10-000        | Various | Unidentified Registered Entities | 52       | 0                  | 2019-0030 |                         |
| 1/30/2014  | NP14-29-000        | WECC    | Unidentified Registered Entity   | 1        | \$109,000          | 2019-0019 |                         |

| Date       | FERC Docket Number | Region   | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|------------|--------------------|----------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 10/30/2014 | NP15-5-000         | SPP      | Unidentified Registered Entity   | 1        | \$45,000           | 2019-0019 |                         |
| 10/30/2014 | NP15-6-000         | TRE      | Unidentified Registered Entity   | 1        | \$106,000          | 2019-0019 |                         |
| 11/25/2014 | NP15-9-000         | MRO      | Unidentified Registered Entity   | 1        | \$150,000          | 2019-0019 |                         |
| 11/25/2014 | NP15-10-000        | WECC     | Unidentified Registered Entity   | 1        | \$150,000          | 2019-0019 |                         |
| 11/25/2014 | NP15-11-000        | RFC      | Unidentified Registered Entity   | 1        | \$75,000           | 2019-0019 |                         |
| 12/30/2014 | NP15-18-000        | Multiple | Unidentified Registered Entities | 10       | \$124,000          | 2019-0019 |                         |
| 3/31/2015  | NP15-23-000        | WECC     | Unidentified Registered Entities | 3        | \$165,000          | 2019-0019 |                         |
| 12/1/2015  | NP16-5-000         | WECC     | Unidentified Registered Entity   | 1        | \$200,000          | 2019-0019 |                         |
| 12/30/2015 | NP16-7-000         | SPP      | Unidentified Registered Entity   | 1        | \$235,000          | 2019-0019 |                         |
| 1/28/2016  | NP16-9-000         | WECC     | Unidentified Registered Entity   | 1        | 0                  | 2019-0019 |                         |
| 1/28/2016  | NP16-10-000        | RF       | Unidentified Registered Entity   | 1        | \$150,000          | 2019-0019 |                         |



| Date       | FERC Docket Number | Region     | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|------------|--------------------|------------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 2/29/2016  | NP16-12-000        | RF         | Unidentified Registered Entity   | 1        | \$1,700,000        | 2019-0019 |                         |
| 4/28/2016  | NP16-18-000        | RF / SERC  | Unidentified Registered Entities | 5        | \$115,000          | 2019-0019 |                         |
| 5/31/2016  | NP16-20-000        | FRCC       | Unidentified Registered Entity   | 1        | \$35,000           | 2019-0019 |                         |
| 7/28/2016  | NP16-23-000        | SERC       | Unidentified Registered Entity   | 1        | \$225,000          | 2019-0019 |                         |
| 7/28/2016  | NP16-24-000        | SERC       | Unidentified Registered Entity   | 1        | \$180,000          | 2019-0019 |                         |
| 10/31/2016 | NP17-2-000         | WECC       | Unidentified Registered Entity   | 1        | \$1,125,000        | 2019-0019 |                         |
| 10/31/2016 | NP17-3-000         | WECC       | Unidentified Registered Entity   | 1        | \$250,000          | 2019-0019 |                         |
| 11/30/2016 | NP17-8-000         | MRO        | Unidentified Registered Entity   | 1        | \$142,000          | 2019-0019 |                         |
| 12/29/2016 | NP17-10-000        | WECC       | Unidentified Registered Entity   | 1        | 0                  | 2019-0019 |                         |
| 12/29/2016 | NP17-11-000        | WECC       | Unidentified Registered Entity   | 1        | 0                  | 2019-0019 |                         |
| 12/29/2016 | NP17-12-000        | WECC /SERC | Unidentified Registered Entities | 4        | \$60,000           | 2019-0019 |                         |

| Date       | FERC Docket Number | Region | Registered Entity                | Entities | Total Penalty (\$) | FOIA      | Disclosed=Y<br>Denied=N |
|------------|--------------------|--------|----------------------------------|----------|--------------------|-----------|-------------------------|
| 12/29/2016 | NP17-13-000        | WECC   | Unidentified Registered Entity   | 1        | 0                  | 2019-0019 |                         |
| 4/27/2017  | NP17-21-000        | WECC   | Unidentified Registered Entity   | 1        | \$201,000          | 2019-0019 |                         |
| 7/31/2017  | NP17-25-000        | WECC   | Unidentified Registered Entity   | 1        | 0                  | 2019-0019 |                         |
| 7/31/2017  | NP17-26-000        | SPP RE | Unidentified Registered Entity   | 1        | \$250,000          | 2019-0019 |                         |
| 9/28/2017  | NP17-31-000        | SERC   | Unidentified Registered Entity   | 1        | \$500,000          | 2019-0019 |                         |
| 10/31/2017 | NP18-2-000         | WECC   | Unidentified Registered Entities | 2        | 0                  | 2019-0019 |                         |
| 5/31/2018  | NP18-14-000        | RF     | Unidentified Registered Entity   | 1        | \$180,000          | 2019-0019 |                         |
| 5/31/2018  | NP18-15-000        | WECC   | Unidentified Registered Entity   | 1        | 0                  | 2019-0019 |                         |
| 7/31/2018  | NP18-21-000        | WECC   | Unidentified Registered Entity   | 1        | 0                  | 2019-0019 |                         |
| 8/30/2018  | NP18-22-000        | WECC   | Unidentified Registered Entity   | 1        | 0                  | 2019-0019 |                         |
| 9/27/2018  | NP18-26-000        | NPCC   | Unidentified Registered Entity   | 1        | 0                  | 2019-0019 |                         |

| Date      | FERC Docket Number | Region | Registered Entity                | Entities | Total Penalty (\$) | FOIA | Disclosed=Y Denied=N |
|-----------|--------------------|--------|----------------------------------|----------|--------------------|------|----------------------|
| 1/30/2020 | NP20-7-000         | RF     | Unidentified Registered Entities | 1        | \$50,000           |      |                      |
| 3/31/2020 | NP20-12-000        | RF     | Unidentified Registered Entities | 1        | \$225,000          |      |                      |

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"Wired for Greed: The Shocking Truth About America's Electric Utilities"

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Lawsuit filed to end electric grid coverup

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Frank Gaffney interviews Michael Mabee on the electric grid

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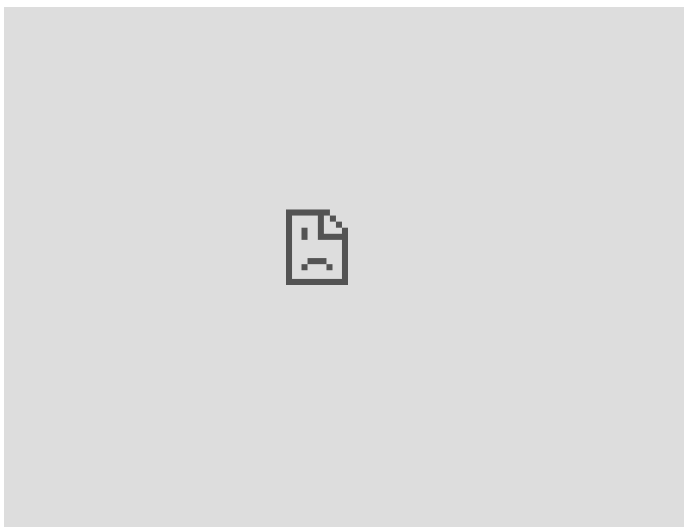
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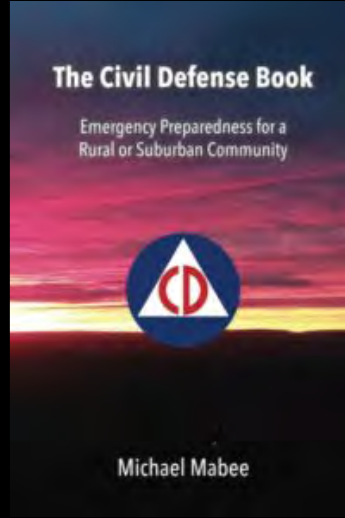
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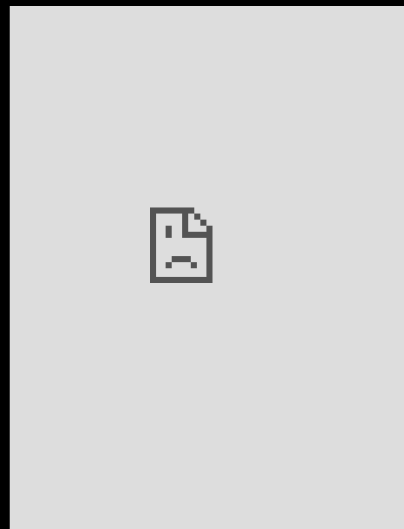
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5,000 National Guard troops in 15 states and DC activated to help quell growing civil unrest

[www.militarytimes.com/news/your-military/2020/05/31/5000-national-guard-troops-in-15-states-and-d...](http://www.militarytimes.com/news/your-military/2020/05/31/5000-national-guard-troops-in-15-states-and-d...)

#### 5,000 National Guard troops in 15 states and DC activated to help quell growing civil unrest

[www.militarytimes.com](http://www.militarytimes.com)

Thousands of National Guard troops have been activated across the nation to deal with civil unrest.

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"Especially disturbing is that 200 transformers, a pillar of the power grid, have come from China into the United States in the last 10 years, according to Charles Durant, deputy director of counterintelligence at the U.S. Department of Energy."

[www.insidesources.com/another-critical-supply-chain-america-must-bring-home/](http://www.insidesources.com/another-critical-supply-chain-america-must-bring-home/)

#### Another Critical Supply Chain America Must Bring Home - InsideSources

[www.insidesources.com](http://www.insidesources.com)

In recent weeks Americans have been aghast and disgusted to see the dangerous extent to which we rely on China for the personal protective equipment so

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Multiple States to FERC: “The public has a right to know”



Posted on November 28, 2019 by Michael Mabee

## New Mexico tells the federal government: “The public has a right to know.”

The State of New Mexico, in an [extraordinary filing](#) with the Federal Energy Regulatory Commission ([FERC](#)), just made it clear that the public has a right to know the names of the companies that are endangering us.

The issue is that since 2010, the North American Electric Reliability Corporation ([NERC](#)) has been withholding the names of regulatory violators submitted to FERC. In the last nine years, ALL the names of companies that violate of Critical Infrastructure protection (CIP) standards, which include cybersecurity and physical security standards, have been covered up from public view. FERC, for its part, did nothing to prevent the industry from affecting this coverup of their dirty laundry. In fact, FERC perpetuated the coverup by [delaying and denying](#) Freedom of Information Act (FOIA) requests for the identities of these violators.

Under intense [public and congressional pressure](#) to end the coverup, the staffs of FERC and NERC published a “[white paper](#)” in August and opened a public docket for comments ([Docket No. AD19-18-000](#)).

The New Mexico Public Regulation Commission ([PRC](#)) Just filed the [letter](#) in this FERC “[white paper docket](#)” laying it out as clearly as possible:

The PRC believes that two principles should guide the FERC’s decision-making concerning the degree of openness in Notices of Penalty (NOP) for violations of Critical Infrastructure Protection (CIP).

1. The public has a right to know if any utility is not complying with FERC reliability standards and its wildfire prevention plans, as do local and statewide government agencies. This information could be useful to them in myriad ways, not the least of which is mitigation of forest fires.



2. Grid resiliency should be a primary value. To the extent keeping CIP outage information confidential undermines grid resiliency, the rules should be changed to promote more openness.

New Mexico, in their filing, endorsed the proposal of the New Hampshire Office of Consumer Advocate who also [called for more transparency](#). The coverup came to light when my [investigation](#) revealed that between July of 2010 and July of 2019 FERC has withheld the identity of the regulatory violators in 253 cases, involving close to 1,500 companies. The investigation revealed a massive cover-up by the electric grid regulators in which they have hidden the identities of all violators of Critical Infrastructure Protection (CIP) regulations concerning cybersecurity and physical security.

## New Hampshire says: “The public has a right to know.”

This may sound somewhat geeky, but the FERC “white paper docket” was exciting. First of all, just the fact that public pressure forced FERC and NERC to consider more transparency was a victory for democracy. (In China, Russia or Iran, many of us would have “disappeared” or been sent to gulags for criticizing a government sanctioned cover up.) Second, the public’s voice was heard. There were over 60 filings in favor of increased transparency from members of the public, public advocacy groups as well as elected and appointed public officials.

Heroically, a group of New Hampshire officials stood up for the public. It started with New Hampshire Representative [Kat McGhee](#) listening to a constituent’s concerns and having the courage to be the first public official to comment on the docket. Rep. Kat McGhee advised FERC:

“With cyber mischief and the potential for cyber warfare on the rise, we are in no position to dismiss tools that help reinforce critical security. On the question of cyber-security transparency for the grid system, I believe we are benefited by more public insight, not less.”

A bipartisan group of New Hampshire legislators followed: New Hampshire State Rep. [Donna Mombourquette](#), New Hampshire Rep. [David Woodbury](#) and New Hampshire Rep. [David Testerman](#) all filed comments. And critically, Donald Kreis, the New Hampshire Office of Consumer Advocate [noted](#):

"The need for transparency is all the more acute in these particular circumstances; via Section 215(c) of the Federal Power Act and the FERC's designation of an industry-sponsored organization (NERC) as the nation's primary reliability watchdog, the federal government has substantially privatized an essential public function subject to carefully circumscribed oversight from the FERC."

U.S. Congresswoman [Ann McLane Kuster](#) also wrote to FERC urging them to increase transparency:

"While FERC has issued fines to utilities that are found in noncompliance, ratepayers are left in the dark as to whether their utility is in compliance with cybersecurity standards. It would be prudent for FERC to judiciously examine how increased transparency of cybersecurity violations would improve compliance with cybersecurity standards and enhance both ratepayer and lawmakers understanding of current cybersecurity threats to our electric grid."

In addition to the New Hampshire public officials, several New Hampshire citizens and the New Hampshire based [Foundation for Resilient Societies](#) commented on this docket. See below for all the comments.

## Across the Country: "The public has a right to know."

Citizens across the country wrote in to this FERC "white paper" docket demanding more transparency and an end to the coverup. In addition to the citizens, several Public Utility Commissions, consumer advocacy groups and even an organization representing the press filed comments in favor of more transparency.

The [State of Connecticut](#) agencies (Connecticut Public Utilities Regulatory Authority Connecticut Office of Consumer Counsel) noted:

The CT Agencies believe that making the violator's name public serves three functions: 1) it brings unwanted attention to the violator and in doing so acts as an added deterrent against violations; 2) it assists state agencies and other parties with oversight/regulatory/advocacy responsibilities in following-up and taking appropriate action; and 3) it specifically alerts and informs the public in the vicinity of the violator.

The [Louisiana Public Service Commission](#) believes:

There do seem to be several areas where additional public disclosure of information might be accomplished while not providing potential violators with any useful information. This is particularly true since the CIP NOPs will not be filed until after mitigation is complete.

The PUCs and state authorities in particular seem annoyed that the identities of violators have been kept from state regulators as well.

The [New York Power Authority](#) noted the importance of having sufficient information available to the state authorities:

Noncompliance information posted to NERC's Enforcement and Mitigation website provides an important resource for utilities to improve their NERC Reliability Standards compliance programs and further support self-enforcement.

And the [New Jersey Board of Public Utilities](#) noted that the ongoing coverup impacted state regulators as well:

The Board generally supports the recommendations stated in the Joint White Paper as they appear to balance confidentiality, transparency, security and efficiency concerns. However, the Board, as a state regulatory commission, urges the Commission and NERC Staff to consider enhancing this process to enable state commissions access to the confidential information submitted in the attachment.

In addition to six states telling the federal government that more transparency is needed, the [Reporters Committee for Freedom of the Press](#) noted:

With respect to the identities of electric utilities that violate rules designed to protect the nation's grid against cyber and physical attacks, logic and practice illustrate that disclosure will yield greater accountability, and ultimately promote greater compliance with applicable cybersecurity laws.

It is clear that the public, the state regulators, elected and appointed state and federal officials and the press are demanding increased transparency – and an end to the coverup of the identities of CIP violators.

So who would possibly oppose ending the coverup? Why, the industry whose identities are being covered up, of course!

## The Electric Industry Says the Public is Too Stupid To Handle Transparency.

Astoundingly, the electric utility industry argues that more transparency would confuse the public. (So we best keep the coverup going.) The Joint Trade Associations argued that releasing the penalty amounts to the public would be dangerous:

“While penalty amounts are not CEII, they can create some risk, as well as significant confusion for the public.” (Page 14.)

In other words, the industry says you are too stupid to be able to understand significance of the amount of a fine against your utility company. Ouch. Unfortunately, the insults continue:

“Given that the public would require specialized training and expertise to derive any value from the name of the Standard violated (beyond the general understanding that a Standard was violated), it is not clear what benefit there is in automatic disclosure of this information. To better protect BPS reliability, reference to specific Standards should not be included in the NOP public cover sheet.” (Page 11.)

And,

“[T]he detailed information included in NOPs is not meaningful to the general public as it is highly technical and requires specialized training and expertise to understand.” (Page 14.)

Translated: The public is not sophisticated enough to understand even the name of a cybersecurity standard. In sum, it's better to hide all of the CIP citations since the public is too stupid to understand them anyway.

The U.S. Chamber of Commerce says that divulging the names of violators would discourage entities from “self reporting” violations:

“Any disincentive to self-reporting could serve to undermine, rather than support, overall cyber compliance efforts. Thus, the routine disclosure of entities subject to a

Notice of Penalty would be counterproductive, and should be rejected."

Excuse me? So you are saying that the electric grid is going to engage in a [regulatory mutiny](#) if FERC releases the names of the violators? Who is running this regulatory show anyway, the industry or the government? (Stupid question. Clearly the industry.)

But there is some sanity in this docket. As the [New Hampshire Office of Consumer Advocate](#) pointed out:

Our experience, as a frequent litigant before the New Hampshire Public Utilities Commission and as an end-user member of NEPOOL (the stakeholder advisory board to the regional transmission organization ISO New England) is that electric utilities (i.e., the same firms that own the bulk power transmission system) consistently rely on conclusory and self-serving allegations about the ill-effects of transparency to thwart efforts to hold them and their regulators publicly accountable.

Amen.

Kudos to the New Hampshire Consumer Advocate and the New Mexico Public Regulation Commission (PRC) for telling it like it is. Below are the comments from the docket – read them and see for yourself – the public has a right to know!

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## Comments in favor of Transparency:

1. [Michael Mabee \(U.S. Army Command Sergeant Major, ret.\)](#)
2. [George Cotter \(former Chief Information Officer, NSA\)](#)
3. [Joseph M. Weiss \(internationally renowned cybersecurity expert\)](#)
4. [David Jonas Bardin \(General Counsel to U.S. Federal Power Commission \[now FERC\] during several Administrations\)](#)
5. [Frank Gaffney \(Founder, Center for Security Policy\)](#)
6. [Tommy Waller](#)
7. [Michael Mabee on the role of transparency in preventing regulatory failures](#)
8. [Congresswoman Ann McLane Kuster](#)
9. [New Hampshire Office of Consumer Advocate](#)
10. [New Hampshire Representative Kathy "Kat" McGhee](#)
11. [New Hampshire State Representative Donna Mombourquette](#)
12. [New Hampshire Representative David Woodbury](#)

13. [New Hampshire Representative David Testerman](#)
14. [Karen Testerman](#)
15. [Foundation for Resilient Societies](#)
16. [Louisiana Public Service Commission](#)
17. [Connecticut Public Utilities Regulatory Authority, et. al.](#)
18. [New Jersey Board of Public Utilities, et al.](#)
19. [Aldrich B. Monahan Jr.](#)
20. [Mortimore Kelly](#)
21. [John W Russell](#)
22. [Preston L. Schleinkofer](#)
23. [Fred Reitman](#)
24. [Dennis Hunt](#)
25. [Dale Rowley](#)
26. [Ken Sletten](#)
27. [David Phelps](#)
28. [Comment by a Concerned Citizen](#)
29. [Task Force on National and Homeland Security](#)
30. [Constance A. Zimmerman](#)
31. [Mary S. Kass](#)
32. [Terri Timmcke](#)
33. [Reporters Committee for Freedom of the Press](#)
34. [Alyssa A. Lappen](#)
35. [Andrew Bumbak](#)
36. [Jim LeBlanc](#)
37. [Dennis P. Burke, SR](#)
38. [Kenneth D. Chrosniak](#)
39. [J. Dexter Smith](#)
40. [Douglas Ellsworth](#)
41. [Sara Z. Wood](#)
42. [Henry W. Newton](#)
43. [Richard Firth](#)
44. [Valerie J. MacIntosh](#)
45. [Stacey West](#)
46. [Bradley A. Kropf](#)
47. [Phyllis Ulrich](#)
48. [Foundation for Resilient Societies](#)
49. [Theresa V. Hubbard](#)
50. [Eunie Smith](#)
51. [Joseph A. Voglund](#)
52. [Frank Heindel](#)

53. [DeNexus, Inc.](#)
54. [Gabriel Frank](#)
55. [Jerry R. Ladd and James M. Babcock, CIWRX, Inc.](#)
56. [George E. Kondos](#)
57. [Public Citizen, Inc.](#)
58. [Eric Richter](#)
59. [Sandra J. Lafleur](#)
60. [Foundation for Resilient Societies](#)
61. [New Mexico Public Regulation Commission \(PRC\)](#)

## Comments Against Transparency:

(Note that all of these are either the electric utility industry itself, or groups representing the electric utility industry. I consider the Department of Energy – a captive regulator – to fit into the latter category: “groups representing the electric utility industry.”)

1. [Joint Trade Associations](#)
2. [U.S. Chamber of Commerce](#)
3. [North American Generator Forum \(NAGF\)](#)
4. [PSEG Companies](#)
5. [Georgia System Operations Corporation](#)
6. [Cogentrix Energy Power Management, LLC](#)
7. [Memphis Light, Gas and Water Division](#)
8. [Midcontinent Independent System Operator, Inc.](#)
9. [MISO Transmission Owners](#)
10. [ISO-RTO Council](#)
11. [Wolverine Power Supply Cooperative, Inc.](#)
12. [United States Department of Energy](#)

Final note: I find it highly disturbing that the Chamber of Commerce claims that FOIA has been “weaponized” to expose the CIP violators and then the U.S. Department of Energy – the following day – provides the industry with legal advice to avoid FOIA disclosures. In fact, I was so disturbed, that I filed a Freedom of Information Act (FOIA) request with the U.S. Department of Energy to determine to what extent their filing was influenced by the electric utility industry. ([Read my FOIA request HERE.](#))

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