

DOCKET NO. RR12-__-000

**NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION**

2013 BUSINESS PLAN AND BUDGET FILING

ATTACHMENT 1

SUMMARY TABLES FOR NERC AND REGIONAL ENTITY

PROPOSED 2013 BUDGETS AND ASSESSMENTS

NERC'S Proposed Budget by Program¹

NERC Program	2012 Budget for Statutory Functions	2013 Budget for Statutory Functions
Reliability Standards	\$ 9,156,601	\$ 9,775,088
Compliance Operations and Organization Registration	\$ 7,860,024	\$ 6,644,000
Compliance Enforcement, Reporting, Tracking and Analysis	\$ 6,528,040	\$ 6,725,004
Reliability Assessments and Performance Analysis	\$ 6,968,860	\$ 7,762,436
Training, Education and Operator Certification	\$ 3,098,130	\$ 3,571,766
Event Analysis and Investigations	\$ 5,126,471	\$ 6,023,424
Situation Awareness	\$ 6,534,397	\$ 5,324,311
Critical Infrastructure Protection	\$ 7,839,749	\$ 8,460,227
Total Budget	\$ 53,112,272	\$ 54,286,256

¹Does not include the proposed provision for Working Capital reserve funding

Proposed Budget for Statutory Activities of NERC, each Regional Entity and WIRAB¹

	2012 Budget for Statutory Functions	2013 Budget for Statutory Functions
NERC	\$ 53,112,272	\$ 54,286,256
FRCC	\$ 6,394,454	\$ 6,531,782
MRO	\$ 9,057,228	\$ 9,283,539
NPCC	\$ 13,680,642	\$ 13,879,226
RFC	\$ 16,656,499	\$ 17,426,838
SERC	\$ 15,594,445	\$ 15,907,603
SPP RE	\$ 11,410,642	\$ 11,514,818
TRE	\$ 10,613,458	\$ 10,935,780
WECC	\$ 67,969,168	\$ 51,025,092
WIRAB	\$ 614,677	\$ 595,180
Total Budget	\$ 205,103,485	\$ 191,386,114

¹Does not include the proposed provision for Working Capital reserve funding

Proposed Assessments for Statutory Activities of NERC and each Regional Entity

	Assessments for Statutory Functions 2012		Allocation to U.S. 2012		Assessments for Statutory Functions 2013		Allocation to U.S. 2013	
NERC	\$	50,661,272	\$	46,132,189	\$	47,604,156	\$	43,036,224
FRCC	\$	4,424,850	\$	4,424,850	\$	5,957,971	\$	5,957,971
MRO	\$	8,349,029	\$	6,994,464	\$	9,098,927	\$	7,672,246
NPCC	\$	12,551,567	\$	7,308,162	\$	12,352,264	\$	7,441,691
RFC	\$	13,534,272	\$	13,534,272	\$	14,165,848	\$	14,165,848
SERC	\$	14,845,275	\$	14,845,275	\$	13,829,878	\$	13,829,878
SPP RE	\$	9,851,647	\$	9,851,647	\$	8,530,054	\$	8,530,054
TRE	\$	9,503,866	\$	9,503,866	\$	8,152,520	\$	8,152,520
WECC ¹	\$	37,220,341	\$	31,507,675	\$	41,497,239	\$	35,469,348
Total Budget	\$	160,942,119	\$	144,102,400	\$	161,188,857	\$	144,255,780

¹ Includes assessments for WECC and WIRAB

DOCKET NO. RR12-13-000

**NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION**

2013 BUSINESS PLAN AND BUDGET FILING

ATTACHMENT 2A

**NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION**

**UPDATED 2013 BUSINESS PLAN AND BUDGET
CLEAN VERSION**

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

2013 Business Plan and Budget

Board of Trustees Approved: August 16, 2012
Updated September 10, 2012

RELIABILITY | ACCOUNTABILITY



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About NERC

Overview

The North American Electric Reliability Corporation (NERC) is a not-for-profit entity organized under the New Jersey Nonprofit Corporation Act. NERC's mission is to improve and ensure the reliability of the bulk power system in North America. NERC's area of responsibility spans the continental United States and Canada and the northern portion of Baja California, Mexico. Entities under NERC's jurisdiction are the users, owners, and operators of the bulk power system – a system that serves the needs of over 334 million people, includes installed electricity production capacity of approximately 1,200 gigawatts, operates 211,000 miles of high voltage transmission, and is comprised of assets worth more than one trillion dollars.

The Federal Energy Regulatory Commission (FERC or Commission) certified NERC as the Electric Reliability Organization (ERO) within the United States to establish and enforce reliability standards for the United States portion of the bulk power system, pursuant to section 215 of the Federal Power Act. NERC is subject to regulatory oversight by FERC.

In Canada, NERC presently has memoranda of understanding with provincial authorities in Ontario, New Brunswick, Nova Scotia, Québec, Saskatchewan, and Alberta, and with the National Energy Board of Canada. NERC standards are mandatory and enforceable in Ontario and New Brunswick as a matter of provincial law. NERC has an agreement with Manitoba Hydro, making reliability standards mandatory for that entity, and Manitoba has recently adopted legislation setting out a framework for standards to become mandatory for users, owners, and operators in the province. In addition, NERC has been designated as the “electric reliability organization” under Alberta's Transportation Regulation, and certain reliability standards have been approved in that jurisdiction; others are pending. NERC and the Northeast Power Coordinating Council (NPCC) have been recognized as standards setting bodies by the Régie de l'énergie of Québec, and Québec has the framework in place for reliability standards to become mandatory. NERC standards are now mandatory in British Columbia and Nova Scotia.

Scope of Responsibilities

As the ERO, NERC's primary responsibilities are leading the development, adoption, and improvement of mandatory reliability standards for the bulk power system in North America; leading the monitoring, evaluating, and enforcement of compliance with those reliability standards by the approximately 1,900 entities registered with NERC as bulk power system users, owners, and operators; and assessing the reliability and adequacy of the bulk power system in North America. Collectively, the entities registered with NERC as bulk power system users, owners, and operators perform over 4,600 bulk power system reliability functions. NERC conducts near-term and long-term assessments of the reliability and future adequacy of the North American bulk power system; certifies bulk power system operators as having and maintaining the necessary knowledge and skills to perform their reliability responsibilities; maintains situational awareness of events and conditions that may threaten the reliability of the bulk power system; coordinates efforts to improve physical and cyber security for the bulk

power system of North America in order to maintain the reliability and adequacy of the bulk power system; and conducts detailed analyses and investigations of system disturbances and unusual events to determine root causes, uncover lessons learned, and issue relevant findings as advisories, recommendations, and essential actions to the industry, in order to identify the potential need for new or modified reliability standards, maintain compliance with existing standards, and assess the reliability of the bulk power system.

NERC's authority as the ERO is based on section 215 of the Federal Power Act as added by the Energy Policy Act of 2005¹ and the Commission's regulations and orders issued pursuant to Section 215. However, NERC's objective both before and after becoming the ERO has been to promote and improve the reliability, adequacy, and security of the bulk power system in North America. Voluntary compliance with operational and planning protocols by certain sectors of the industry prior to enactment of section 215 and certification of an ERO was replaced with mandatory and enforceable reliability standards for users, owners, and operators of the bulk power system in North America, with which NERC is charged with monitoring and enforcing compliance.

A series of FERC orders set the parameters of NERC's statutory activities in the United States in Order No. 672; the Commission found that "section 215 of the FPA provides for federal authorization of funding limited to the development of Reliability Standards and their enforcement, and monitoring the reliability of the Bulk-Power System."² In certifying NERC as the ERO, the Commission held that "[w]e generally believe that anything required of the ERO or a Regional Entity by the statute, Order No. 672 pursuant to the statute, or any subsequent Commission order pursuant to section 215 of the FPA is a statutory activity."³ In Order No. 693, in which the Commission approved as mandatory and enforceable under section 215 NERC's initial proposed set of operations and planning reliability standards, the Commission stated that section 215 also "contemplates the prevention of incidents, acts, and events that would interfere with the reliable operation of the Bulk-Power System."⁴

In each of its orders approving NERC's initial three annual business plans and budgets for its activities as the ERO (for the years 2007, 2008 and 2009), the Commission found that the activities proposed by NERC as statutory reasonably fall within the types of activities the Commission considers to be covered by section 215 and should be funded pursuant to section 215.⁵ In those annual business plans and budgets and in its subsequent business plans and budgets, NERC has organized its proposed statutory activities in a set of program areas: Reliability Standards; Compliance Monitoring and Enforcement and Organization Registration and Certification; Training, Education, and Operator Certification; Reliability Assessment and

¹This was codified in section 215 of the Federal Power Act, 16 U.S.C. §. 824o.

² *N. Am. Elec. Reliability Corp.*, 114 FERC ¶ 61,104 at P202 (2006) (Order No. 672).

³ *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062 at P185 (2006) (emphasis added). See also *N. Am. Elec. Reliability Corp.*, 132 FERC ¶ 61,217 at P 45 n.33 (2010)..

⁴ *Mandatory Reliability Standards for the Bulk-Power System*, Order No. 693, FERC Stats. & Regs. ¶ 31,242 at P 24,

⁵ *N. Am. Elec. Reliability Corp.* 117 FERC ¶ 61,091 (2006); *N. Am. Elec. Reliability Corp.*, 121 FERC ¶ 61,057 (2007) ("2008 ERO Budget Order"); *N. Am. Elec. Reliability Corp.*, 125 FERC ¶ 61,056 (2008) (finding that "NERC's 2009 Business Plan provides sufficient details for us to determine whether NERC intends to perform appropriate activities" and that "NERC's proposed categories of activities for 2009 . . . reasonably fall within the types of activities the Commission considers to be covered by FPA section 215," *id.* at P 18).

Performance Analysis; Situational Awareness; and Infrastructure Security.⁶ NERC's annual business plans and budgets have also presented its plans and budgets for NERC's administrative functions and departments which are necessary to operate the organization and support the performance of the specific statutory programs: General and Administrative, Legal and Regulatory, Information Technology, Human Resources, and Accounting and Finance. In its business plan and budget filing for 2008, NERC provided a detailed explanation of how each of its statutory program areas fulfilled an ERO responsibility under section 215:

The principal activities of the ERO as specified in Section 215 of the FPA and in the Commission's regulations promulgated thereunder are development of reliability standards for the bulk power system (§ 215(d) of the FPA; 18 C.F.R. § 39.5); enforcement of compliance with reliability standards, including imposition of penalties and sanctions for violations (§ 215(e) of the FPA; 18 C.F.R. § 39.7); and conducting periodic assessments of the reliability and adequacy of the bulk power system in North America (§ 215(g) of the FPA; 18 C.F.R. § 39.11). In addition, the ERO may delegate functions to regional entities pursuant to delegation agreements approved by the Commission (§ 215(c) (4) of the FPA; 18 C.F.R. § 39.8).

NERC has organized and presented its business plan and budget based on six specific program areas. Each of these program areas carries out or supports implementation of one or more of the statutory activities. Specifically: (1) the Reliability Standards Program implements the statutory activity of development of reliability standards. (2) The Compliance Enforcement and Organization Registration and Certification Program implements the statutory activity of enforcement of compliance with reliability standards, including imposition of penalties and sanctions for violations of standards. (3) The Reliability Readiness Evaluation and Improvements Program supports the statutory activity of enforcing and achieving compliance with reliability standards and the statutory activity of conducting assessments of the reliability of the bulk power system. This program also provides information and feedback that supports the statutory activity of development of reliability standards. (4) The Training, Education and Operator Certification Program supports the statutory activity of enforcing and achieving compliance with reliability standards, and also provides information and feedback that supports the statutory activity of development of reliability standards. (5) The Reliability Assessment and Performance Analysis Program implements the statutory activity of conducting periodic assessments of the reliability and adequacy of the bulk power system in North America. This program also provides information and feedback that supports the statutory activities of development of reliability standards and achieving compliance with reliability standards. (6) The Situation Awareness and Infrastructure Security Program supports the statutory activity of enforcing and achieving compliance

⁶ An additional program area included in the 2007 and 2008 business plans and budgets, Reliability Readiness Evaluation and Improvements, was subsequently terminated in 2009. The Commission approved NERC's recommendation to eliminate the Reliability Readiness Program, see: *North American Electric Reliability Corp., Order on Compliance Filing*, 128 FERC ¶ 61,025 (2009).

with reliability standards, and also provides information and feedback that supports the statutory activities of development of reliability standards and conducting assessments of the reliability and adequacy of the bulk power system.

In response to the above explanation, the Commission concluded, in approving NERC's Business Plan and Budget for 2008:

We find that NERC's submitted business plan provides sufficient detail for us to determine whether NERC intends to pursue appropriate activities. NERC's proposed categories of activities are the same as those approved by the Commission for NERC's 2007 budget and reasonably fall within the types of activities the Commission considers to be covered by FPA section 215. As we explained in the 2007 Budget Order, anything required of the ERO or a Regional Entity by the statute, Order No. 672 pursuant to the statute, or any subsequent Commission order pursuant to section 215 of the FPA is a statutory activity.⁷

In NERC's annual business plans and budgets for the ensuing three years (2010, 2011 and 2012), NERC has presented, and the Commission has approved, the budgets for NERC's activities organized in accordance with these statutory program areas.⁸

Additionally, each of NERC's statutory program areas is embodied in one or more sections and associated appendices of NERC's Rules of Procedure (ROP), which have been approved as ERO rules pursuant to section 215(f) of the Federal Power Act and 18 C.F.R. §39.10 by orders issued by the Commission:

- Reliability Standards Development: ROP section 300 and Appendices 3A, 3B and 3D.
- Compliance Monitoring and Enforcement and Organization Registration and Certification: ROP sections 400 and 500 and Appendices 4A, 4B, 4C, 4D, 5A and 5B.
- Training, Education, and Operator Certification: ROP sections 600 and 900 and Appendix 6.
- Reliability Assessment and Performance Analysis, including Event Analysis: ROP section 800 and Appendix 8.
- Situational Awareness and Infrastructure Security: ROP section 1000.

Accordingly, for the last six years, under the Commission's oversight and approval, NERC has undertaken its specific activities and programs within its defined statutory program areas in support of the implementation of its statutory responsibilities to develop and support reliability standards; monitor, enforce and achieve compliance with these standards; and assess the reliability and adequacy of the bulk power system in North America.

⁷ 2008 ERO Budget Order at P 21.

⁸ *N. Am. Elec. Reliability Corp.*, 129 FERC ¶ 61,040 (2009) ; *N. Am. Elec. Reliability Corp.*, 133 FERC ¶ 61,062 (2010) ; *North American Electric Reliability Corp.*, 137 FERC ¶ 61,071 (2011) .

In an effort to further improve transparency, NERC's 2013 Business Plan and Budget provides more granular detail regarding the specific activities which will be undertaken by NERC's program areas and the departments within those program areas in order to provide stakeholders with an opportunity to further understand and provide input regarding the scope of NERC's proposed activities in relation to its responsibilities as the ERO under section 215 of the Federal Power Act.

Membership and Governance

Membership in NERC is open to any person or entity that has an interest in the reliability of the North American bulk power system. Membership in NERC is voluntary and affords participants the opportunity to engage in the governance of the organization through election to the Member Representatives Committee (MRC). The number of entities and individuals who are members is nearly 600.

A Board of Trustees (Board) governs NERC⁹. The Board has formed several committees to facilitate its oversight of the organization in the areas of finance and audit, governance and human resources, compliance, standards oversight and technology, and nominations. In August 2011, upon recommendation of the Finance and Audit Committee and with the support of stakeholders, the Board approved the formation of a Risk Management and Internal Controls Subcommittee (RMICS) comprised of all of the members of the Finance and Audit Committee, the chair of the Compliance and Certification Committee, and the president of the Regional Entity Management Group.¹⁰

The MRC comprises 28 voting representatives elected from the 12 membership sectors. The MRC elects the independent trustees, and along with the Board votes on amendments to the Bylaws, and provides policy advice and recommendations to the Board on behalf of stakeholders with respect to annual budgets, business plans, and other matters pertinent to the purpose and operation of the organization.

Delegated Authorities

In executing a portion of its responsibilities, NERC delegates authority to Regional Entities to perform certain functions through delegation agreements. FERC has approved delegation agreements between NERC and the eight Regional Entities (Florida Reliability Coordinating Council, Midwest Reliability Organization, Northeast Power Coordinating Council, Inc., ReliabilityFirst Corporation, SERC Reliability Corporation, Southwest Power Pool RE, Texas Reliability Entity, Inc. and the Western Electricity Coordinating Council). These delegation agreements describe the authority delegated to the Regional Entities in the United States to propose and enforce reliability standards within their geographic footprints. NERC expects Regional Entities whose territories extend into Canadian provinces and Mexico to perform equivalent functions in those jurisdictions.

⁹ At present, there is a 12 member Board. Commencing in February 2013, there will be an 11 member Board (10 independent directors plus the CEO serving as the management trustee).

¹⁰ The RMICS mandate is available at <http://www.nerc.com/docs/bot/finance/FAC05-08-12a-OPEN-complete.pdf>

NERC and Regional Entity personnel are actively engaged in numerous activities in support of ERO objectives and in carrying out their respective responsibilities under the delegation agreements. At the senior executive level, the ERO Executive Management Group, comprised of the chief executive officers and associated management staffs of NERC and the eight Regional Entities, provides strategic policy guidance and operational direction for the activities of the ERO enterprise (NERC and the Regional Entities) through coordinated decision-making to execute the Regional Entities' responsibilities under the delegation agreements and the NERC ROP. As part of its efforts to ensure efficient and effective use of resources while executing the statutory responsibilities of the ERO across the ERO enterprise, the ERO Executive Management Group also manages a series of working groups and subcommittees, including:

- Regional Standards Group
- Certification and Registration Working Group
- ERO Compliance and Enforcement Management Group
- Compliance Monitoring Processes Working Group
- Enforcement, Sanctions and Mitigation Working Group
- CIP Compliance Working Group
- Training and Education Group
- Reliability Assessments and Performance Analysis Group
- Legal Working Group
- Information Management Group
- Information Technology Steering Group
- Regional Communicators Group
- ERO Finance Group

NERC and the Regional Entities have worked cooperatively to address the costs incurred (as well as the amount of time spent) by the Regional Entities for processing compliance violations, by implementing the “Find, Fix, Track and Report” (FFT) and the “Spreadsheet Notice of Penalty” (Spreadsheet NOP) enforcement alternatives to the development of a full NOP for every possible Violation. NERC presented the FFT and Spreadsheet NOP enforcement alternatives to the Commission in a petition filed on September 30, 2011,¹¹ and the Commission accepted this filing in an order issued March 15, 2012.¹² The FFT and Spreadsheet NOP enforcement mechanisms will be used for Possible Violations that pose lesser risk (minimal risk in the case of the FFT) to the bulk power system and satisfy other criteria. Where a Possible

¹¹ *Petition Requesting Approval of New Enforcement Mechanisms and Submittal of Initial Informational Filing Regarding NERC's Efforts to Refocus Implementation of its Compliance Monitoring and Enforcement Program*, Docket RC11-6-000, filed Sept. 30, 2011.

¹² *N. Am. Elec. Reliability Corp., Order Accepting with Conditions the Electric Reliability Organization's Petition Requesting Approval of New Enforcement Mechanisms and Requiring Compliance Filing*, 138 FERC ¶ 61,193 (2012) (“FFT Order”).

Violation is dispositioned using the FFT or the Spreadsheet NOP mechanism, the Regional Entity will not have to expend time and resources to the same extent as to develop the documentation required for a full NOP filing; rather, the record is aligned to the risk posed by a given Possible Violation and all relevant information is included in a spreadsheet format. Where a Possible Violation is dispositioned through the FFT mechanism, the Regional Entity will not have to expend the time and resources to negotiate a formal settlement agreement, process a separate formal Mitigation Plan through acceptance and approval, or determine a Penalty or sanction for the violation. The availability of the FFT and Spreadsheet NOP enforcement mechanisms will significantly reduce the total amount of resources expended by the Regional Entities in processing compliance violations. In the FFT Order, the Commission stated that NERC's proposal "will be the first step to a more efficient and effective compliance and enforcement process"¹³ and that "we believe that the FFT proposal may significantly reduce the time and resources needed to resolve minor possible violations of Reliability Standards and thereby permit NERC and the Regional Entities to reprioritize their compliance efforts toward more important violations and matters."¹⁴

Earlier, NERC had adopted other approaches to improve the efficiency of Regional Entity violations processing and dispositioning, including an Abbreviated Notice of Penalty Format, a Deficiency Notice of Penalty Format, and an Administrative Citation Notice format. The Commission has stated that the Abbreviated Notice of Penalty Format and Deficiency Notice of Penalty format "have been successful in increasing efficiency" and that it expected the Abbreviated Citation Notice Format "will be a successful tool in improving the efficiency of NERC's enforcement process, thereby reducing the time and resources expended by the Regional Entities, NERC, and Commission staff while still achieving transparency and consistency in penalty determinations for violations that are appropriate for this format."¹⁵

In the FFT Order, the Commission invited, among other things, in the twelve-month report due in March 2013, the submission of information regarding changes and improvements to the FFT program going forward, including expanding the scope and parameters of possible violations to be processed by FFT informational filings.¹⁶ Future steps are currently being considered and will be addressed in NERC's upcoming twelve-month report. These future steps are being developed with the engagement, input and participation of Regional Entities and industry stakeholders.

Funding

Section 215 of the Federal Power Act and FERC regulations also specify procedures for NERC's funding in the United States. NERC's annual business plan and budget is subject to FERC approval in the United States. Once approved, assessments are allocated to load-serving

¹³ FFT Order at P 41.

¹⁴ FFT Order at P 40.

¹⁵ *N. Am. Elec. Reliability Corp., Notice of No Further Review of Initial Administrative Citation Notice of Penalty*, 134 FERC ¶ 61,157 (2011) at P 7.

¹⁶ FFT Order at P 76.

entities on a net energy for load (NEL) basis. Equivalent funding mechanisms are provided in Canada, subject to the specific laws and regulations of each province.

The funding requirements for each Regional Entity are addressed separately in each Regional Entity's business plan and budget, which must be reviewed and approved by NERC and FERC in the United States. Assessments for the Regional Entity budgets are included in the overall NERC assessments to load-serving entities.

Introduction and Executive Summary

TOTAL RESOURCES (in whole dollars)				
	2013 Budget	U.S.	Canada	Mexico
Statutory FTEs	186.25			
Non-statutory FTEs				
Total FTEs	186.25			
Statutory Expenses	\$ 54,093,957			
Non-Statutory Expenses	\$ -			
Total Expenses	\$ 54,093,957			
Statutory Inc(Dec) in Fixed Assets	\$ 192,299			
Non-Statutory Inc(Dec) in Fixed Assets	\$ -			
Total Inc(Dec) in Fixed Assets	\$ 192,299			
Statutory Working Capital Requirement	\$ (2,033,600)			
Non-Statutory Working Capital Requirement				
Total Working Capital Requirement	\$ (2,033,600)			
Total Statutory Funding Requirement	\$ 52,252,656			
Total Non-Statutory Funding Requirement	\$ -			
Total Funding Requirement	\$ 52,252,656			
Statutory Funding Assessments	\$ 47,604,156	\$ 43,036,224	\$ 4,443,246	\$ 124,686
Non-Statutory Fees				
NEL	4,526,616,128	3,996,240,765	519,333,921	11,041,442
NEL%	100.00%	88.28%	11.47%	0.24%

Strategic Goals and Objectives

NERC's mission is to improve and ensure the reliability of the bulk power system of North America. NERC furthers this mission by developing clear, reliability-focused standards; promoting compliance excellence with its reliability standards; providing firm but fair enforcement of mandatory reliability standards; assessing and reporting on existing and future reliability performance; analyzing and reporting on system events to identify and share lessons learned; maintaining the system operator certification program; and facilitating industry awareness and management of risks to reliability.

Each year, senior management from NERC and the Regional Entities devote considerable time and effort to the business planning and budgeting process, including refining and updating goals, objectives, deliverables, and common multi-year business planning and budgeting assumptions, taking into account lessons learned and stakeholder feedback, as well as applicable governmental requirements and directives. NERC's Board also participates in strategic planning, building on input from NERC and the Regional Entity Management Group.

The 2013 strategic planning initiative produced the following common goals and objectives:

1. Standards and Compliance

- a) Develop clear, reasonable and technically sound mandatory reliability standards in a timely and efficient manner. These standards establish threshold requirements for ensuring the bulk power system is planned, designed, operated, and maintained in a manner that minimizes risks of cascading failures, avoids damage to major equipment, or limits interruptions of bulk power supply.
- b) Be a strong enforcement authority that is independent, without conflict of interest, objective, and fair. The ERO will retain and refine its ability to use standards enforcement when warranted and impose penalties and sanctions commensurate with risk.
- c) Promote a culture of compliance with mandatory reliability standards across the industry. The ERO will support the industry by identifying procedures, practices, and controls to address reliability risks resulting from noncompliance.

2. Risks to Reliability

- a) Identify the most significant risks to reliability. The ERO will identify and prioritize reliability risks, identify actions to mitigate these risks, and monitor results.
- b) Be accountable for mitigating reliability risks. The ERO will work with industry stakeholders and experts to ensure the mitigation of known risks to reliability using standards enforcement and other methods where appropriate.
- c) Promote a culture of reliability excellence. The ERO will facilitate a learning environment throughout the industry through event causal analysis, communication of lessons learned, and tracking of recommendations.

3. Coordination and Collaboration

- a) Improve transparency, consistency, quality, and timeliness of results. The ERO will accomplish this through effective coordination, collaboration, and process improvements.
- b) Operate as a collaborative enterprise. The ERO will communicate expectations clearly and foster collaboration to deliver important results in advancing system reliability.
- c) Improve efficiencies and cost effectiveness. The ERO will accomplish this by engaging the support of stakeholders, being an efficient steward of resources, and leveraging information systems to create efficiencies and process controls.

Focusing on Priorities

In furtherance of the foregoing strategic goals and objectives, NERC will be focusing on a number of high priority items for 2013 including:

- Issuing new and revised standards, including the development of results-based standards, as well as working with industry, applicable governmental authorities and other stakeholders to improve the standards development process.
- Continuing to improve enforcement focus, efficiency and productivity, including working with regulatory authorities and stakeholders to develop and implement improvements in the enforcement framework which focuses both ERO and industry resources on compliance activities that are most likely to support the reliability of the North American bulk power system.
- Regional Entity collaboration, coordination and oversight.
- Improving the ability of industry to respond to incidents, vulnerabilities, and threats that have the potential to adversely affect bulk power system reliability.
- Educating stakeholders on the role and long-term strategy for the ES-ISAC.
- Event analysis, emerging issues and reliability risk reporting.
- Developing and implementing improvements to ERO processes, including the design and deployment of necessary IT infrastructure to facilitate these process improvements, and improvements in internal financial and operating controls.
- Improving compliance information and education.
- Enhancing reliability risk metrics and modeling capabilities.
- Developing competencies of ERO staff through training and providing training to stakeholders on standards and effective compliance.

Challenges

NERC, along with the Regional Entities and industry participants in the ERO, continue to face a number of challenges and demands as they work to achieve the ERO's strategic objectives. The more significant challenges include:

- Improving the standards development process;
- Focusing on reliability risk and delivery of results;
- Continuing to improve the compliance enforcement framework, focus and processes;
- Identifying and addressing critical infrastructure protection priorities;
- Addressing regulatory mandates;
- Continuing to implement the improvements identified in the Three-Year ERO Performance Assessment;
- Balancing resource needs within financial constraints, and achieving efficiencies; and

- Recruiting, integrating and retaining qualified personnel.

As to two of these challenges, NERC wishes to highlight efforts that are underway. First, with respect to the standards development process, in 2012, the Standards Process Input Group (SPIG) was formed and it has issued a report identifying five recommendations for improvements. The Board accepted the SPIG report and endorsed the five recommendations at the May 2012 Board meeting. Efforts remain ongoing.

Second, as noted above, further improvements and enhancements to the compliance enforcement framework, focus and processes are under consideration and will be identified in the March 2013 compliance filing in accordance with the FFT Order.

2013 Key Assumptions

As mentioned above, NERC and the Regional Entities' Business Plans and Budgets reflect a set of common assumptions, attached as [Exhibit A](#). The significant assumptions underlying NERC's 2013 Business Plan include:

1. There will be no material changes in the legal framework under which NERC and the Regional Entities operate;
2. The final determination of what constitutes the Bulk Electric System may affect the scope of ERO jurisdictional facilities and will likely impact both NERC and Regional Entity resource requirements;
3. There will be continued industry participation to support key program areas including but not limited to standards development, event analysis, and reliability assessments;
4. External factors, including regulatory actions and assessing the impacts of new technologies will continue to affect resource needs and allocation;
5. ERO, industry and regulatory resources will focus on improvements in the standards development process;
6. Critical infrastructure protection will continue to be a priority in the United States and Canada;
7. Continued refinement of risk-based methodologies to support more effective and efficient compliance monitoring and enforcement will mitigate compliance resource needs;
8. The frequency of compliance audits will transition to be more reflective of a registered entity's reliability risk profile;
9. Current trends in the number of new alleged standards violations each month will continue (e.g., violations of Order 693 standards gradually trending downward and violations of cyber security standards continuing to increase);
10. The level of event review and analysis will increase with the implementation of an advanced application of cause analysis; cause coding, data analysis and risk control collection, to facilitate quality aggregate trending and identification of causal factors and

emerging reliability risks to support reliable operation of the bulk power system. This effort is not expected to materially impact resource requirements; and

11. Significant investments will be required over the planning period to develop and implement program area and enterprise-wide applications to support business needs, including compliance, registration and tracking systems and other project, data management and analysis tools to provide greater cost efficiency and uniformity across the ERO Enterprise.

2013 Key Deliverables

Consistent with the list of priority items emerging from its strategic planning initiative, the following is the list of significant NERC deliverables for 2013.

Reliability Standards

- Work with industry to implement process changes to improve efficiency and timeliness of high priority reliability risk mitigating standards.
- Implement process changes to facilitate the removal of administrative requirements where feasible and improve throughput of standards addressing emerging reliability risks while reducing burdens on industry.
- Increase standards development coordination with compliance and enforcement
- Facilitate the consideration of internal controls programs by registered entities in the standards development process
- Support the three-year Standards Development Plan.¹⁷
- Reduce backlog of FERC directives, as well as improve tracking and reporting of directives implementation.
- Improve the quality of standards drafting, training and communications.
- Track and report standards process results on a quarterly basis.

Compliance Operations

- Develop a compliance trial program which provides an opportunity for mitigation while achieving compliance, as well as an opportunity to validate compliance measures and procedures.
- Develop risk-based compliance monitoring approaches to maximize reliability benefits and improve efficiencies.
- Continue education programs regarding effective compliance programs and risk controls.
- Continue to improve oversight of Regional Entity activities, including facilitating the development of highly qualified compliance and audit staff.
- Improve consistency and transparency.
- Increase support for standards activities to foster the development of standards with increased reliability benefit while minimizing compliance risk uncertainties.

¹⁷ [Standards Development Plan](#)

Enforcement

- Achieve greater efficiencies in enforcement processing by focusing attention and resources on cases having the most significant impact on reliability.
- Sustain and expand the FFT process.
- Reduce outstanding caseload of previously identified Possible Violations and Alleged Violations.
- Identify the causes and trends in violations.

Reliability Assessments

- Issue reliability assessment reports, guidelines, recommendations and alerts.
- Develop risk control strategies and plans to address existing and emerging reliability risks.
- Support standards development process and response to FERC Directives.
- Provide support and leadership to the Planning Committee, the Standing Committees' subcommittees, working groups, and task forces.
- Build and sustain an enterprise reliability assessment and performance analysis team.
- Subject to final regulatory action, finalize Bulk Electric System and consequential load loss exception processes.

Reliability Risk Management

- Use of more sophisticated cause codes for analysis.
- Refinement of risk-based methodologies to support more effective and efficient identification of reliability risks.
- Provide timely publication of lessons learned and recommendations and track responses to recommendations.
- Refine the criteria and process for self-analysis of events and disturbances to promote continuous improvement and information sharing.
- Facilitate the dissemination and sharing of information regarding lessons learned and industry innovations in the area of human performance.

Situation Awareness

- Increase the awareness and exchange of information among stakeholders regarding threats to bulk power system reliability based on data which is collected and analyzed through use of state of the art software tools.

Critical Infrastructure Protection

- Support
 - CIP standards development
 - Regional Entity audit oversight and assistance
 - The Critical Infrastructure Protection Committee
 - Training and awareness initiatives
 - Electricity Sub-sector Coordinating Council
 - CIP Compliance Working Group
- Continue to enhance information sharing and dissemination of bulk power system threat and vulnerability information through Electricity Sector Information Sharing and Analysis Center (ES-ISAC).
- Conduct security incident analysis and information sharing.

Training and Education

- Training and education programs, including:
 - Development and implementation of clear and technically sound reliability standards;
 - Key lessons learned and trends from events and analyses;
 - Risk-based assessment methods;
 - Effective compliance cultures with practices, procedures and controls to address reliability risks; and
 - Effective root, apparent and common cause analysis methods.
- Implement upgrades to the system operator certification and continuing education database.

Information Technology

- Design and deploy a common, enterprise-wide technology platform.
- Design a reliable, stable, secure environment for data gathering and reporting through a single repository of data; Phase I data warehouse design.
- Implement enhanced disaster recovery of critical IT resources.
- Implement a laptop backup application.
- Implement Phase II of the NERC public website upgrade.
- Enhance or replace applications supporting key business processes.

Overview of Funding Requirements

Now in the third year of the three-year plan first set forth in 2011, NERC's 2013 Business Plan and Budget reflects the resources required for NERC to continue to deliver on its mission. NERC's 2013 Business Plan and Budget also reflects the ongoing efforts of NERC to better define program area requirements and allocate resources in order to make more meaningful and demonstrable contributions to improvements in the reliability of the bulk power systems in North America. NERC has enhanced the depth of information provided in its 2013 Business Plan and Budget to improve transparency by providing significantly more detail regarding departmental activities and costs, including the relationship of these activities to furthering the goals of section 215 of the Federal Power Act.

NERC's 2012 Business Plan and Budget presented a three-year budget forecast which reflected a leveling off of incremental resource needs in 2013. NERC's 2013 budget forecast is consistent with this previously forecasted trend and NERC anticipates this trend to continue through 2015 absent major unanticipated events.

The following sections of the 2013 Business Plan and Budget describe in detail the resources needed in 2013 for NERC to continue to carry out its mission. The 2013 funding requirements reflect the costs of ongoing operations, including but not limited to personnel costs based on projected 2012 year-end headcount, contracts for office space, software licensing, third party data management, communication and other services to support operations, as well as the operation and maintenance of infrastructure investments. Incremental funding requirements in 2013 are primarily driven by resources required to fund investments in additional technology and applications to facilitate improved business processes, as well as resource additions to support standards development, Regional Entity oversight, reliability risk assessment and training and education initiatives. The 2013 funding requirements for these items are partially offset by savings realized from the completion, elimination, or reduction in the scope of various other program area initiatives, as well as savings associated with reduction in costs of personnel costs, including significant savings resulting from changes to employee benefit and retirement programs.

NERC is projecting an overall 2013 increase of approximately \$1.2M in total operating expenses and capital expenditures, which is approximately 2.2 percent over 2012 and represents NERC's lowest year-over-year budget increase since becoming the ERO. Total 2013 projected operating expenses and capital expenditures are approximately \$1.0M (1.9 percent) less than the 2013 projection contained in NERC's 2012 Business Plan and Budget.

Penalty funds received in 2012 and a reduction in NERC's working capital reserves will reduce NERC's 2013 assessments funding approximately \$3.1M (6.0 percent) below NERC's 2012 assessments. After taking into account the application of NERC's policies regarding the allocation of United States penalty funds¹⁸, the allocation of certain compliance and enforcement costs¹⁹, and using 2011 net energy for load data, assessments will be

¹⁸ Accounting, Financial Statement and Budgetary Treatment of Penalties Imposed and Received for Violations of Reliability Standards, December 8, 2008

¹⁹ Expanded Policy on Allocation of Certain Compliance and Enforcement Costs, July 29, 2008

approximately \$3.1M (6.8 percent) lower for United States entities, \$67.8k (1.5 percent) higher for Canadian entities, and \$7.0k (5.9 percent) higher for Mexican entities.

NERC is proposing to decrease working capital reserves by approximately \$2.0M in 2013. Management has also developed and the NERC Board of Trustees approved a Working Capital and Operating Reserve Policy, the provisions of which are set forth in Exhibit C, together with 2013 budgeted working capital and operating reserve amounts.

Management has prepared preliminary budget projections for 2014 and 2015. These projections reflect close to a zero (0) percent increase in 2014 and a nominal 2.1 percent increase in 2015. These projections are preliminary and subject to change. Further information regarding the assumptions underlying these projections may be found on page 31.

Cost of Current Operations and Additional Resource Requirements

Building on previous business planning initiatives, including feedback from the Board and stakeholders, the first step NERC took in preparing its 2013 budget was to undertake a comprehensive review of existing resource allocation to ensure alignment with the ERO's strategic goals and objectives. Departmental staffing, consulting, and contractor costs were also thoroughly reviewed, as were travel and meeting expenses and other operating costs. During 2011, NERC management implemented a new employee performance management program to better align individual and departmental performance with corporate goals and objectives. This process, which has now been institutionalized, also provided and will continue to provide an opportunity for management to evaluate and address weaknesses in existing resource capabilities. In early 2012, management implemented a new time reporting system which tracks all employee time and includes the ability to track time by function, major activities and project. This capability will be utilized as a tool to both understand and evaluate resource utilization and make more informed decisions regarding future resource allocation and resources needs. Management is also continuing to review and will be implementing further improvements in operating practices and expense controls in order to achieve additional operating efficiencies.

After completing a comprehensive review of existing staffing, management reviewed the costs associated with existing operations, including opportunities to reduce contractor, consulting and other operating expenses. Similar to the budget presentation format used in 2011 and 2012 the costs associated with NERC's existing operations are referred to as NERC's "base operating budget." The base operating budget excludes funding requirements for working capital reserves. The 2013 base operating budget is approximately \$49.6M or approximately \$3.5M less than NERC's approved 2012 budget. This reduction is primarily due to savings in two areas, personnel costs and contractor and consulting expenses. Reductions in personnel costs are primarily the result of lower projected salary (\$1.6M), benefits (\$223k) and retirement (\$840k) expense. Reductions in contractor and consulting expense (\$1.7M) are primarily the result of the termination of the Interchange Distribution Calculator (IDC) contract, together with completion of work under existing contracts.

NERC's total projected 2013 budget is approximately \$54.3M which, as previously indicated, represents an increase of approximately \$1.2M or 2.2 percent over the company's 2012 budget. The company's 2013 budget for personnel expense is approximately \$745k lower than 2012. This reduction is inclusive of the costs of proposed personnel additions in 2013. The 2013 contract and consulting budget is approximately \$529k higher than 2012. Additional detail regarding the contract and consulting costs by department is provided below, as well as in Section A and Exhibit B.

The 2013 budget includes increased rent expense of \$453k, reflecting the amortization of the lease costs for NERC office space over the term of the leases and the estimated cost of increasing leased space in Atlanta, and a \$150k increase in professional services for outside legal support in connection with the five-year performance assessment of NERC. The 2013 budget also includes a \$1.0M increase in capital expenditures for IT infrastructure, which is discussed further below and in Section A under Administrative Services.

The cumulative effect of the decrease in the cost of current operations, together with proposed incremental 2013 resource additions, is presented in the table below followed by the summary of the proposed additional resource requirements by department.

A		B		C		= B + C	
2012 Base Operating Budget		2013 Projected Change in Base Operating Budget	Projected inc(dec) in Staffing and Programs	Total Projected Increase 2013 v 2012 Budget	Total Projected 2013 Budget		
\$	24,800,833						
			Salaries	\$ (1,585,329)	\$ 840,662	\$ (744,667)	24,056,166
	1,524,935		Payroll Taxes	(126,804)	61,579	(65,225)	1,459,710
	3,190,308		Benefits	(222,801)	112,434	(110,367)	3,079,941
	3,489,736		Retirement	(839,932)	52,784	(787,148)	2,702,588
\$	33,005,812		Total Personnel Expense	\$ (2,774,867)	\$ 1,067,460	\$ (1,707,407)	\$ 31,298,405
\$	736,000		Meetings	\$ 306,000	\$ -	\$ 306,000	1,042,000
	2,787,870		Travel	(124,370)	75,000	(49,370)	2,738,500
	348,910		Conference Calls	(31,100)	-	(31,100)	317,810
\$	3,872,780		Total Meeting Expense	\$ 150,530	\$ 75,000	\$ 225,530	\$ 4,098,310
\$	6,368,000		Consultants and Contracts	\$ (393,926)	\$ 2,084,500	\$ 1,690,574	8,058,574
	300,094		NERCnet Contract	-	-	-	300,094
	1,619,220		IDC Contract	(1,161,634)	-	(1,161,634)	457,586
\$	8,287,314		Contracts and Consultants	\$ (1,555,560)	\$ 2,084,500	\$ 528,940	\$ 8,816,254
\$	2,304,257		Office Rent	\$ 191,407	\$ 261,176	\$ 452,583	2,756,840
	2,838,819		Office Costs	342,696	-	342,696	3,181,515
	2,005,000		Professional Services	136,331	150,000	286,331	2,291,331
	26,200		Miscellaneous	(4,700)	-	(4,700)	21,500
\$	7,174,276		Operating Expenses	\$ 665,734	\$ 411,176	\$ 1,076,910	\$ 8,251,186
\$	-		Non-Operating Expenses	50,000	-	\$ 50,000	\$ 50,000
\$	772,090		Computer & Software CapEx	\$ -	\$ 784,010	\$ 784,010	1,556,100
	-		Network Equipment	-	216,000	216,000	216,000
	-		Furniture & Fixtures	-	-	-	-
\$	772,090		Capital Expenditures	\$ -	\$ 1,000,010	\$ 1,000,010	\$ 1,772,100
\$	53,112,272		Total Base Operating Budget	\$ (3,464,163)	\$ 4,638,146	\$ 1,173,983	\$ 54,286,255

The following is a brief summary of 2013 additional personnel, and contractor and consulting needs by department. Additional detailed information by department is provided in Section A.

- **Standards** — The standards department is proposing to add three (3) positions in 2013, including two (2) standards development advisors and one (1) technical writer. The standards development advisors will allow the department to increase the number of concurrent projects that can be processed. The technical writer will help improve standards quality, which should also improve compliance outcomes and efficiency. \$150k has been added to the contractor and consulting budget for additional resources to support the Standards Process Improvement Initiative.
- **Compliance Operations, Organization Registration and Registration** — One (1) position transferred to another program area and no additional personnel needs are projected²⁰. Consulting support will be required for auditor training and Regional Entity audit oversight. Consulting resources to support training are budgeted under the Training, Education and Operator Certification Program. \$120K in consulting resource to support Regional Entity audit oversight are budgeted as part of the consulting support for NERC's risk management and internal controls framework described further under Administrative Services. This is consistent with the 2012 budget.
- **Enforcement** — No additional personnel needs are projected. Resources required for developing improved data management and analysis systems are budgeted under IT in Administrative Services.
- **Reliability Assessment and Performance Analysis (RAPA)** — One (1) position was added in 2012 to support the development of risk control strategies. One (1) position is proposed to be added in 2013 to provide additional engineering support required to evaluate and prioritize risks and support standards development. \$685k in consulting support has been budgeted to support RAPA initiatives in 2013, a \$313k decrease from RAPA's 2012 budget. The contractor and consulting funding includes software licensing and maintenance fees for the generator, transmission, demand response, spare equipment, and other databases, as well as contractor support for special reliability assessments. A more detailed explanation of contractor and consulting support costs is provided under the Reliability Assessment and Performance Analysis discussion in Section A. Additional specialized consulting support may be required to support the Bulk Electric System exception process. These additional resources will be included as part of the projected contingency operating reserve component of working capital and contingency operating reserve guidelines.
- **Training, Education, and Operator Certification** — One (1) position is proposed to be added to provide administrative support, the cost of which will be paid through operator certification and testing fees and will not impact assessments. Approximately \$850k in contractor and consulting support is included in the 2013 budget to support training, education and operator certification, representing an increase of approximately \$253k over 2012 budgeted levels. A significant portion of this increase

²⁰ However, additional CIP auditors will be added to the Critical Infrastructure Department to support oversight of regional entity CMEP activities.

(\$250k) is to fund improvements in the system operator certification and continuing education database. Working capital additions resulting from user fees received for operator training and certification programs exceeding 2011 program area costs will be used to fund this database upgrade. This funding approach is consistent with the Rules of Procedure and is further discussed in the proposed working capital and contingency operating reserve guidelines.

- **Event Analysis** — One (1) position was added in 2012 to support the Events Analysis department. \$120k is budgeted for outside contractor and consulting support of significant events, such as the 2011 Southwest outage. This is consistent with the amount included in the 2012 budget.
- **Situation Awareness** — No additional personnel are proposed in 2013. Approximately \$2.7M is budgeted for consultants and contractors, including \$2.0M in funding for contracts that support North American Synchro-Phasor Initiative (NASPI), various software tools used to monitor or evaluate reliability or events, software and services support for NERC's secure alert system and costs to support the operation and maintenance of SAFNR. \$460K is budgeted to support the IDC prior to termination and the transition of that contract to IDC users. The Situation Awareness budget also includes approximately \$300k for NERC's share of a third-party secure communications network used to support NERC's situation awareness function. Total 2013 contractor and consulting support for the Situation Awareness department is approximately \$1.1M less than in the 2012 budget, primarily due to elimination of IDC contract costs when the contract expires on March 31, 2012 and the IDC users will directly assume responsibility for the cost of operating and maintaining the IDC.

Critical Infrastructure Protection — One (1) additional position is budgeted in 2013 to support Regional Entity audit oversight, which will result in a total of five (5) CIP auditors supporting this activity. Two (2) Cyber Security Specialist positions will also be added in 2013, one of which will be assigned to the ES-ISAC team. These two cyber security specialists will research, analyze, and disseminate information regarding significant cyber and physical security incidents and the specialist assigned to the ES-ISAC will also support access to operations center positions in the Industrial Control Systems Cyber Emergency Response Team and at the DHS National Incident Coordination Center in Washington, DC. These resources are required to stand watch on the National Cybersecurity and Communications Integration Center floor on a rotating schedule. \$785k is budgeted in 2013 for consulting and contractors to support CIP department activities, which is a \$10k decrease from 2012.²¹ Contractor and consulting support services are to assist in the preparation of a cyber risk preparedness assessment, to provide continued support for the Electricity Sub-sector Coordinating Council (ESCC), and to plan and conduct a grid security exercise similar to the Grid-X exercise which was successfully conducted in 2011. Contractor and consulting support is also included for the build-out and operation of the ES-ISAC, including secure portal services and communications, cyber incident analysis, threat modeling, information reporting, and other services more fully described in Section A under ES-ISAC.

²¹ This reduction is primarily due to the reclassification of a software expenses from contractors and consultant to Office Costs.

- **Administrative Services** — One (1) position is proposed to be added in 2013 to support SharePoint applications development and administration. One (1) position was added to the Finance and Accounting area to provide facilities management. These two additions are offset by a reduction in other positions budgeted in the administrative services area, one of which is a retiring executive and a reduction of one (1) position supporting the Human Resources area. In addition, five (5) staff transferred from other program areas to provide IT project management and administrative and internal controls support as further described in Administrative Services below. Approximately \$2.7M is budgeted in 2013 for contractors and consultants to support various IT infrastructure and applications needs, representing an increase of approximately \$1.3M over 2012. These contractor and consulting resources will:
 - Support major improvements to NERC’s website;
 - Conduct security vulnerability testing;
 - Provide design and integration services; support applications development including improvement in the compliance data base and standards balloting applications;
 - Provide project management, support and maintenance services;
 - Conduct quality assurance testing;
 - Provide data warehouse and common technology platform design;
 - Review existing applications and scope solutions to business needs; and
 - Provide disaster recovery and electronic file backup services.

An additional amount of \$288k is budgeted for contractors and consultants to support Human Resources needs including staff training, compensation consulting, employee, industry and Board effectiveness surveys and automated employee support services, including benefits enrollment and employee self-service automation. The contractor and consulting budget for Human Resources is in line with 2012 budgeted amounts. The final component of contractor and consulting support in the Administrative Services area is for NERC’s Canadian affairs representative and is consistent with 2012 budgeted levels. Additional detail regarding contractor and consulting support for the Administrative Service area is provided under Administrative Services in Section A. Outside legal services are budgeted under professional services and have been increased \$150k over the 2012 budget level to provide funding for additional legal support in connection with NERC’s five-year performance assessment.

To further improve the transparency and openness of NERC’s business plan and budgeting process as compared to previous years, a detailed spreadsheet with a listing of proposed 2013 contract and consulting costs by department, as well as a comparison to 2012 budgeted amounts, is included in Exhibit B.

Working Capital and Contingency Operating Reserves

Working closely with the Finance and Audit Committee of the Board of Trustees management developed a working capital policy and guidelines applicable to the use of operating reserves which are not required to satisfy cash flow requirements or for categories of expenditures that are not included as part of the company's approved annual budget but become necessary during the course of the year. The policy:

- Separates the concept of working capital from operating reserves;
- Establishes criteria and authorities for funding and access to working capital and operating reserves and transfers of reserves between accounts;
- Establishes controls and authorities regarding the reallocation of budgeted funds;
- Establishes a separate operating reserve applicable to funds received in support of the System Operator Certification Program;
- Establishes controls regarding annual headcount and FTE budgets; and
- Establishes transparent reporting requirements.

The final form of Working Capital and Operating Reserve Policy is set forth in Exhibit C, together with 2013 budgeted Working Capital and Operating Reserve amounts.

2013 Funding and Assessment Forecast

NERC's 2013 budget results in a \$1.2M or 2.2 percent increase in operating costs and capital expenditures over NERC's 2012 budget. The chart below provides a breakdown of the relative contributions of the cost of current operation, proposed 2013 resource additions and application of penalty funding to produce a \$3.06M (6.0 percent) reduction in assessments. The chart also reflects a \$1.7M reduction in working capital, a \$250k reduction in revenues for third party licensing of GADS software discussed above under Reliability Assessments and Performance Analysis, and a \$347.3k use of working capital to fund an update of the System Operator Certification and Continuing Education Database (SOCCED), which will reduce operating reserves generated from excess fees collected in prior years. Actual assessments for United States, Canadian and Mexican entities will vary after taking into account polices regarding the allocation of certain compliance and enforcement costs. The following preliminary calculation of proposed changes in assessments reflects these policies.

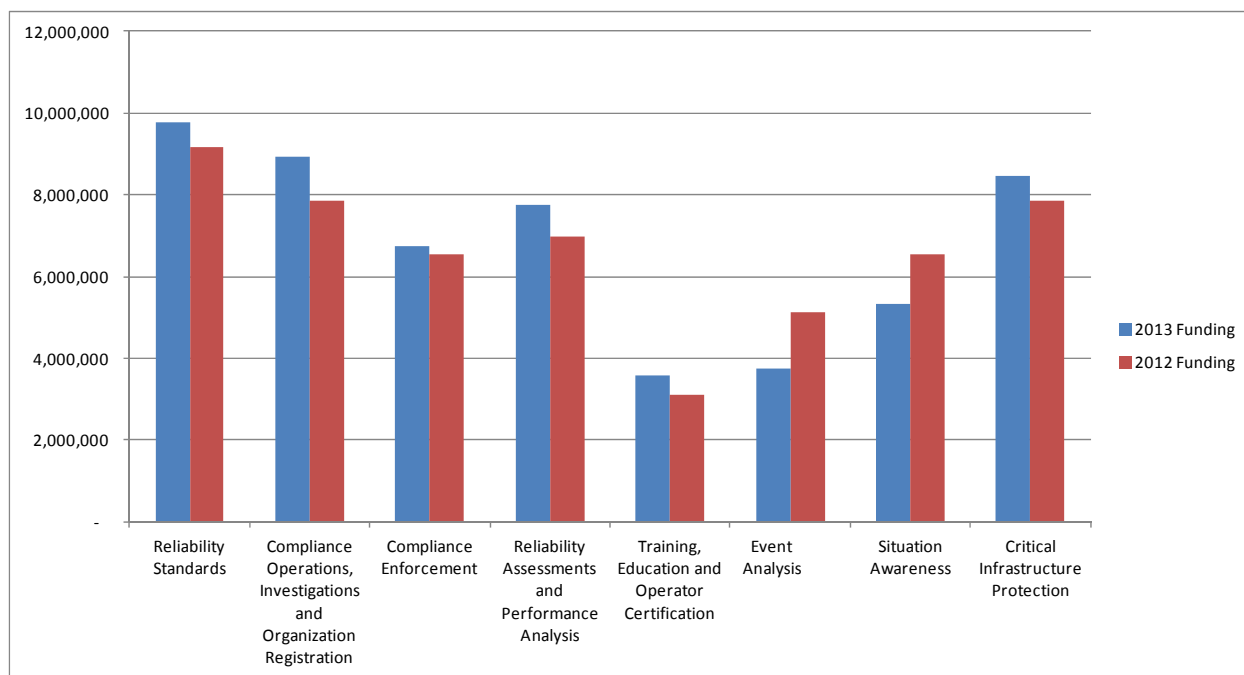
Change in Total Budget 2013 v 2012		% of Total 2012 Budget
Current Operations	\$ (3,464,163)	-6.5%
Proposed 2013 Resource additions	\$ 4,638,146	8.7%
	\$ 1,173,983	2.2%

Increase (Decrease) in 2013 Assessment		% of 2012 Assessments
Due to current operations	\$ (3,464,163)	
Due to proposed resource additions	4,638,145	
Due to Penalty Offset	(2,512,500)	
Due to Reduction in Working Capital	(1,686,309)	
Use of Working Capital - System Operator Testing and Certification - Estimated fees less than budgeted expenses	(347,290)	
Due to increased Workshop Fees	(316,000)	
Due to reductions in revenues for GADS software	250,000	
Due to reductions in System Operator Testing Fees and Certificate Renewal Fees	381,000	
Total	\$ (3,057,116)	-6.0%
Decrease for US entities	(3,095,965)	-6.8%
Increase for Canadian entities	31,783	1.5%
Increase for Mexico entities	7,066	5.9%

The following charts and tables show, (1) the breakdown of funding requirements by department, including allocation of administrative services costs (2) relative increases by department, (3) 2012 and 2013 FTEs and headcount by department, and (4) a comparative Statement of Activities.

Total Budget	Budget 2012*	Projection 2012*	Budget 2013	Change 2013 Budget v 2012 Budget	% Change
Reliability Standards	9,156,601	8,469,326	9,775,088	618,487	6.8%
Compliance Operations, Investigations and Organization Registration*	7,860,024	6,821,532	8,928,994	1,068,970	13.6%
Compliance Enforcement, Reporting, Tracking and Analysis	6,528,040	6,127,367	6,725,004	196,964	3.0%
Reliability Assessments and Performance Analysis	6,968,860	7,550,243	7,762,436	793,576	11.4%
Training, Education and Operator Certification	3,098,130	3,253,881	3,571,766	473,636	15.3%
Event Analysis*	5,126,471	5,739,401	3,738,430	(1,388,041)	-27.1%
Situation Awareness	6,534,397	6,304,552	5,324,311	(1,210,086)	-18.5%
Critical Infrastructure Protection	7,839,749	7,396,830	8,460,227	620,478	7.9%
Total Budget	53,112,272	51,663,132	54,286,256	1,173,984	2.2%

*The 2012 budget and projected expenses from September to December, 2012 of the Event Investigations Team have not been calculated and are therefore included with the 2012 Budget and Projection for Event Analysis.



Total FTE's by Program Area	Budget 2012	Transfers In(Out)	Projection 2012	Total FTEs 2013 Budget	Change from 2012 Budget
STATUTORY					
Operational Programs					
Reliability Standards	24.92	(1.67)	22.31	26.50	1.58
Compliance Operations, Investigations and Organization Registration	21.66	2.34	18.20	24.00	2.34
Compliance Enforcement, Reporting, Tracking and Analysis	21.00		18.48	21.00	-
Reliability Assessments and Performance Analysis	16.50	1.00	16.78	18.75	2.25
Training, Education and Operator Certification	6.75		6.54	8.00	1.25
Event Analysis	13.00	(5.00)	14.25	9.50	(3.50)
Situation Awareness	8.17	(1.67)	5.67	6.50	(1.67)
Critical Infrastructure Protection	17.00		16.03	19.25	2.25
Total FTEs Operational Programs	129.00	(5.00)	118.26	133.50	4.50
Administrative Programs					
Technical Committees and Member Forums	-		-	-	-
General & Administrative	7.00	2.00	9.40	8.00	1.00
Legal and Regulatory	13.00	1.00	12.39	14.00	1.00
Information Technology	12.75	3.00	15.97	16.75	4.00
Human Resources	6.00	(2.00)	4.00	3.00	(3.00)
Finance and Accounting	9.00	1.00	10.79	11.00	2.00
Total FTEs Administrative Programs	47.75	5.00	52.55	52.75	5.00
Total FTEs	176.75	-	170.81	186.25	9.50

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
STATUTORY					
	2012	2012	Variance	2013	Variance
	Budget	Projection	2012 Projection	Budget	2013 Budget
			v 2012 Budget		v 2012 Budget
			Over(Under)		Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ 50,661,272	\$ 50,661,271	\$ (1)	\$ 47,604,156	\$ (3,057,116)
Penalty Sanctions	-	-	-	2,512,500	2,512,500
Total NERC Funding	\$ 50,661,272	\$ 50,661,271	\$ (1)	\$ 50,116,656	\$ (544,616)
Membership Dues	-	-	-	-	-
Testing Fees	2,061,000	2,108,200	47,200	1,680,000	(381,000)
Services & Software	250,000	135,500	(114,500)	-	(250,000)
Workshops	120,000	340,700	220,700	436,000	316,000
Interest	20,000	20,000	(0)	20,000	-
Miscellaneous	-	1,806	1,806	-	-
Total Funding (A)	\$ 53,112,272	\$ 53,267,477	\$ 155,205	\$ 52,252,656	\$ (859,616)
Expenses					
Personnel Expenses					
Salaries	\$ 24,800,833	\$ 23,245,401	\$ (1,555,432)	\$ 24,056,166	\$ (744,667)
Payroll Taxes	1,524,935	1,397,780	(127,155)	1,459,710	(65,225)
Benefits	3,190,308	2,479,453	(710,855)	3,079,941	(110,367)
Retirement Costs	3,489,736	2,420,586	(1,069,150)	2,702,588	(787,148)
Total Personnel Expenses	\$ 33,005,812	\$ 29,543,220	\$ (3,462,592)	\$ 31,298,405	\$ (1,707,407)
Meeting Expenses					
Meetings	\$ 736,000	\$ 896,421	\$ 160,421	\$ 1,042,000	\$ 306,000
Travel	2,787,870	2,287,311	(500,559)	2,738,500	(49,370)
Conference Calls	348,910	270,718	(78,192)	317,810	(31,100)
Total Meeting Expenses	\$ 3,872,780	\$ 3,454,449	\$ (418,331)	\$ 4,098,310	\$ 225,530
Operating Expenses					
Consultants & Contracts	\$ 8,287,314	\$ 9,022,974	\$ 735,660	\$ 8,816,254	\$ 528,940
Office Rent	2,304,257	2,784,036	479,779	2,756,840	452,583
Office Costs	2,838,819	3,062,803	223,984	3,181,515	342,696
Professional Services	2,005,000	2,767,025	762,025	2,291,331	286,331
Miscellaneous	26,200	21,896	(4,304)	21,500	(4,700)
Depreciation	1,900,717	1,609,827	(290,890)	1,579,801	(320,916)
Total Operating Expenses	\$ 17,362,307	\$ 19,268,559	\$ 1,906,252	\$ 18,647,242	\$ 1,284,935
Total Direct Expenses	\$ 54,240,899	\$ 52,266,228	\$ (1,974,671)	\$ 54,043,957	\$ (196,942)
Indirect Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Other Non-Operating Expenses	\$ -	\$ 68,903	\$ 68,903	\$ 50,000	\$ 50,000
Total Expenses (B)	\$ 54,240,899	\$ 52,335,131	\$ (1,905,768)	\$ 54,093,957	\$ (146,942)
Change in Assets	\$ (1,128,627)	\$ 932,345	\$ 2,060,972	\$ (1,841,301)	\$ (712,674)
Fixed Assets					
Depreciation	\$ (1,900,717)	\$ (1,609,827)	\$ 290,890	\$ (1,579,801)	\$ 320,916
Computer & Software CapEx	772,090	734,358	(37,732)	1,556,100	784,010
Furniture & Fixtures CapEx	-	212	212	-	-
Equipment CapEx	-	90,958	90,958	216,000	216,000
Leasehold Improvements	-	112,299	112,299	-	-
Allocation of Fixed Assets	\$ -	\$ 0	\$ 0	\$ -	\$ -
Inc(Dec) in Fixed Assets (C)	(1,128,627)	(672,000)	456,627	192,299	1,320,926
TOTAL BUDGET (=B + C)	\$ 53,112,272	\$ 51,663,132	\$ (1,449,140)	\$ 54,286,256	\$ 1,173,984
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ -	\$ 1,604,345	\$ 1,604,345	\$ (2,033,600)	\$ (2,033,600)
FTEs	176.75	170.81	(5.94)	186.25	9.5

Summary of Variances by Category – 2013 Budget Compared to the 2012 Budget

- **Personnel Expenses** – Total Personnel Expenses are projected to decrease approximately \$1.7M from 2012. In addition to phasing the timing of new hires in 2013, NERC assumed three percent personnel attrition rate based on current trends. Salary and Payroll Tax expenses are projected to be lower in 2013 than in 2012 even though 9.5 FTEs are being added due to lower average costs per FTE. As reflected in Table B-4 on page 115, the average cost per FTE for salary and payroll tax expense are projected to be \$129,161 and \$7,837 respectively in 2013, which is less than the average costs in the 2012 budget by \$11,155 and \$790 respectively. As previously indicated, changes to NERC's employee benefit and retirement plans also resulted in lower average costs per FTE in 2013. The average cost per FTE for employee benefit plans is projected to be \$1,513 lower and the average cost per FTE for retirement plans is projected to be \$5,233 lower in 2013 compared to the 2012 budget. In total, the average total personnel costs per FTE are projected to be \$18,692 lower in 2013 compared to the 2012 budget.
- **Meetings, Travel and Conference Calls** – Meetings expenses include the cost of catering, audio visual and meeting rooms for all meetings and workshops sponsored by NERC. Meetings expense does not include NERC employees' travel to attend the meeting. All business travel is recorded as Travel Expense. The 2013 budget for Meetings Expense is \$306k higher than 2012 primarily due to an increase in the number of workshops and by the number of attendees. The increase in workshop expenses is offset by higher funding from workshop fees.
- **Operating Expenses**
 - *Contracts and Consultants* – A detailed listing of all Contracts and Consulting projects is included in Exhibit B and is further detailed in each Program in Section A.
 - *Office Rent* – Scheduled increases in rent for NERC's Atlanta and Washington, DC offices, as well as projected costs associated with the exercise of an option to lease additional space in Atlanta. The company's Atlanta office is almost 100% occupied. The company is adding staff to the Standards department during Q4 of this year and in 2013, as well as projecting limited additions to Standards staff located in Atlanta in 2014 and 2015. It's also expected that in the future NERC will continue to replace departing telecommuting staff with staff based in-house where feasible. The favorable lease terms which the company negotiated several years ago continue to be very attractive in the current market, which has seen some increase over 2011, and will apply to the option space. Similar to the terms of the existing base lease, the option includes provisions for a tenant improvement allowance, which is expected to be sufficient to cover the expense of building out and furnishing the space. The lease of the option space will not become effective until receipt of all necessary corporate approvals and FERC approval of the company's 2013 Business Plan and Budget.
 - *Office Costs* – Primarily related to higher maintenance and service agreements for network equipment, computers and software licenses.

- *Professional Services* – \$150k related to the five-year performance assessment of NERC.
- **Miscellaneous Expenses** – NERC is not planning or budgeting for a year-end holiday party in 2013. NERC may have year-end employee meetings and the associated expenses will be recorded as meeting and/or travel expenses, as applicable and described above. Table B-9 on page 115 details the budget for employee rewards and recognition, planned activities for community responsibility and employee engagement and other miscellaneous expenses.
- **Fixed Assets** – As further detailed in Section A under Information Technology, the variance is for planned investments in infrastructure for a centralized data repository and for disaster recovery.

Projections for 2014-2015

The 2014 budget is projected to be approximately \$307k (0.6 percent) less than the 2013 budget. The 2015 budget is projected to be approximately \$1.2M (2.1 percent) higher than the 2014 budget.

2014 Assumptions

- **Personnel** – Increases \$2.8M due to salary increases, increased benefits costs and 6.0 new positions (3.75) FTEs: 2.0 Standards Development Advisors and 1.0 Technical Writer; 1.0 Risk Control Strategy and Standards Coordinator in RAPA; 1.0 Reliability Engineer in Events Analysis and Investigations; and 1.0 SharePoint Developer in IT. The remaining 1.75 FTEs is the effect of 2013 new hires being on staff for the full year.
- **Contracts and Consultants** – Decreases \$2.3M
 - Situation Awareness decreases \$1.5M due to elimination of IDC contract (\$457k), completion of NASPI contract (\$810k), and a reduction in the cost of the SAFNR contract (\$223k)
 - RAPA decreases \$245k due to RADS Assessment Database development completed in 2013 and reduction in contract support to study the reliability effects of geomagnetic disturbance (GMD).
 - CIP decreases \$135k; a grid security exercise is not planned for 2014 (\$200k), offset by increases in ESCC support and Cyber Risk Preparedness Assessments.
 - IT decreases approximately \$620k due to projected lower funding requirements for multiple projects.

2015 Assumptions

No additional personnel were included in the projection since it was not possible to predict incremental resource needs for 2015 with any degree of accuracy and at this point are assumed to be primarily driven by unanticipated external factors and efforts to improve the efficiency of current operations and resource utilization. Budgeted salary adjustments and projected increases in benefits costs add approximately three percent (\$1M) to the total budget.

**Statement of Activities, Fixed Assets Expenditures and Change in Working Capital
2013 Budget & Projected 2014 and 2015 Budgets**

	2013 Budget	2014 Projection	\$ Change 14 v 13	% Change 14 v 13	2015 Projection	\$ Change 15 v 14	% Change 15 v 14
Funding							
ERO Funding							
NERC Assessments	\$ 47,604,156	\$ 52,239,494	\$ 4,635,337	9.74%	\$ 53,209,726	\$ 970,233	1.8%
Penalty Sanctions	2,512,500	-	(2,512,500)	-100.00%	-	-	-
Total NERC Funding	\$ 50,116,656	\$ 52,239,494	\$ 2,122,837	4.2%	\$ 53,209,726	\$ 970,233	1.8%
Membership Dues	-	-	-	-	-	-	-
Testing Fees	1,680,000	1,665,000	(15,000)	-0.89%	1,650,000	(15,000)	-0.9%
Services & Software	-	-	-	-	-	-	-
Workshops	436,000	436,000	-	0.00%	436,000	-	0.0%
Interest	20,000	20,000	-	0.00%	20,000	-	0.0%
Miscellaneous	-	-	-	-	-	-	-
Total Funding (A)	\$ 52,252,656	\$ 54,360,494	\$ 2,107,837	4.0%	\$ 55,315,726	\$ 955,233	1.8%
Expenses							
Personnel Expenses							
Salaries	\$ 24,056,166	\$ 26,128,797	\$ 2,072,631	8.6%	\$ 26,873,501	\$ 744,704	2.9%
Payroll Taxes	1,459,710	1,581,570	121,860	8.3%	1,614,049	32,479	2.1%
Benefits	3,079,941	3,432,779	352,837	11.5%	3,706,580	273,802	8.0%
Retirement Costs	2,702,588	2,931,057	228,469	8.5%	2,894,320	(36,737)	-1.3%
Total Personnel Expenses	\$ 31,298,405	\$ 34,074,203	\$ 2,775,797	8.9%	\$ 35,088,450	\$ 1,014,247	3.0%
Meeting Expenses							
Meetings	\$ 1,042,000	\$ 1,042,000	\$ -	0.0%	\$ 1,042,000	\$ -	0.0%
Travel	2,738,500	2,738,500	-	0.0%	2,738,500	-	0.0%
Conference Calls	317,810	317,810	-	0.0%	317,810	-	0.0%
Total Meeting Expenses	\$ 4,098,310	\$ 4,098,310	\$ -	0.0%	\$ 4,098,310	\$ -	0.0%
Operating Expenses							
Consultants & Contracts	\$ 8,816,254	\$ 6,481,917	(2,334,337)	-26.5%	\$ 6,425,305	(56,612)	-0.9%
Office Rent	2,756,840	2,605,676	(151,165)	-5.5%	2,605,676	-	0.0%
Office Costs	3,181,515	3,307,791	126,276	4.0%	3,235,287	(72,504)	-2.2%
Professional Services	2,291,331	2,182,278	(109,053)	-4.8%	2,182,278	-	0.0%
Miscellaneous	21,500	21,000	(500)	-2.3%	21,000	-	0.0%
Depreciation	1,579,801	1,696,930	117,129	7.4%	1,969,314	272,384	16.1%
Total Operating Expenses	\$ 18,647,242	\$ 16,295,592	\$ (2,351,650)	-12.6%	\$ 16,438,860	\$ 143,268	0.9%
Total Direct Expenses	\$ 54,043,957	\$ 54,468,105	\$ 424,148	0.8%	\$ 55,625,620	\$ 1,157,516	2.1%
Indirect Expenses	\$ -	\$ -	\$ -	0.0%	\$ -	\$ -	0.0%
Other Non-Operating Expenses	\$ 50,000	\$ 50,000	\$ -	0.0%	\$ 50,000	\$ -	0.0%
Total Expenses (B)	\$ 54,093,957	\$ 54,518,105	\$ 424,148	0.8%	\$ 55,675,620	\$ 1,157,516	2.1%
Change in Assets	\$ (1,841,301)	\$ (157,611)	\$ 1,683,690	-91.4%	\$ (359,894)	\$ (202,283)	128.3%
Fixed Assets							
Depreciation	\$ (1,579,801)	\$ (1,696,930)	\$ (117,129)	7.4%	\$ (1,969,314)	\$ (272,384)	16.1%
Computer & Software CapEx	1,556,100	1,556,100	-	0.0%	1,556,100	-	0.0%
Furniture & Fixtures CapEx	-	-	-	-	-	-	-
Equipment CapEx	216,000	216,000	-	0.0%	216,000	-	0.0%
Leasehold Improvements	-	-	-	-	-	-	-
Allocation of Fixed Assets	-	-	-	-	-	-	-
Inc(Dec) in Fixed Assets (C)	\$ 192,299	\$ 75,170	\$ (117,129)	-60.9%	\$ (197,214)	\$ (202,283)	0.0%
TOTAL BUDGET (=B + C)	\$ 54,286,256	\$ 54,593,275	\$ 307,019	0.6%	\$ 55,478,406	\$ 1,157,516	2.1%
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ (2,033,600)	\$ (232,781)	\$ 1,800,819	-88.6%	\$ (162,680)	\$ 70,101	-30.1%
FTEs	186.25	191.75	5.50		194.00	2.25	

Section A — 2013 Business Plan and Budget

Reliability Standards

Reliability Standards Program (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	24.92	26.50	1.58
Direct Expenses	\$ 5,307,943	\$ 5,134,738	\$ (173,205)
Indirect Expenses	\$ 4,011,842	\$ 4,581,241	\$ 569,399
Other Non-Operating Expenses	\$ -	\$ -	\$ -
Inc(Dec) in Fixed Assets	\$ (163,184)	\$ 59,109	\$ 222,293
TOTAL BUDGET	\$ 9,156,602	\$ 9,775,088	\$ 618,486

Background and Scope

NERC's Reliability Standards Program develops and maintains standards designed to ensure the reliability of the bulk power system in North America. The Reliability Standards Program carries out the ERO's statutory responsibility to develop, adopt, obtain approval of, and modify as and when appropriate, mandatory reliability standards (both continent-wide standards and regional reliability standards) for the reliable planning, operation and critical infrastructure protection of the North American bulk power system. This statutory responsibility is set forth in section 215(d) of the Federal Power Act as well as 18 C.F.R. §39.5. The Commission-approved ROP governing the operation of the Reliability Standards Program are ROP section 300 and Appendices 3A, 3B and 3D.

NERC's ANSI-accredited standards development process was reaccredited in 2011 and found to be open, balanced, and transparent. The process is very labor intensive with respect to the NERC and Regional staff and the industry technical experts upon which it relies heavily. Industry technical experts scope, draft, review and ultimately approve through a multi-cycle balloting and commenting process, the new or revised NERC Reliability Standards for adoption by NERC's Board of Trustees and filing with regulatory authorities in the United States and Canada.

NERC standard development advisors, coordinators and other standards staff facilitate standards drafting team activities, assist the drafting teams in maintaining adherence to the development process, and ensure that the quality of documents produced are appropriate for approval by industry and the NERC Board of Trustees. NERC manages the work of over 200 industry contributors serving on standards drafting, interpretation and other project teams for the development of NERC standards through its standards development program. Additionally, hundreds of industry volunteers within registered entities and other entities review and comment on the products of these teams.

The standards program also provides the eight Regional Entities with the mechanism to process regional standards when reliability gaps are detected at the regional level. The NERC standards staff supports each of the eight Regional Standards Development Processes by providing such services as technical advice, final quality review of regional standards, presentation to the NERC Board of Trustees and preparation of regional standards petition materials for submission to the applicable regulatory authorities in the United States and Canada for adoption.

An extensive regulatory interface capability provides active engagement with FERC standards staff in an effort to resolve the historical FERC standards directives. Additionally, projects that may lead to standards modifications, but which are not yet ripe for specific standards drafting team assignment include examples such as the Order 754 project examining single point of failure.²²

Key Standards Production Efforts in 2012

At the request of the Commission, through its processes and with the tremendous support of the industry, NERC successfully created and submitted a proposed new definition of the Bulk Electric System and an accompanying exception process to manage it effectively through its Rules of Procedure. The definition will clarify assets and applicability which should help registered entities better fulfill their obligations under the Reliability Standards. Standards modifications in the area of Critical Infrastructure Protection, Real-Time Operations, Disturbance and Sabotage Reporting are other high priority efforts for 2012.

Key process-related focus areas in 2012 included:

Standard Process Improvement Initiative

At the request of the NERC Board of Trustees, the Member Representatives Committee formed a Standards Process Input Group (SPIG) and sought industry feedback on ways to improve the quality, timeliness, efficiency and effectiveness of the standards development process, as well as the importance and significance of meeting ANSI requirements. The SPIG developed a proposal²³ calling for significant change in the approach used to plan overall ERO execution strategy, including a new approach designed to decide whether a risk issue should be directed towards standards development as the vehicle for mitigation. This will be undertaken through the establishment of a Reliability Issues Steering Committee (RISC), which will review risks and decide on a comprehensive risk mitigation strategy – through the use of standards, guidance, training, other vehicles, or a combination of these. The Board of Trustees has endorsed this proposal, and implementation is underway in 2012 with the capability expected to be fully operational in 2013. Some of the proposed changes are expected to increase the throughput of standards; however, it is unlikely the workload in the standards function will decrease as a result. Workload will increase due to the identified need for advanced project management skills and training, more comprehensive meeting facilitation, and the applications of more specialists with technical writing skills.

²² http://www.nerc.com/files/2012_Directives_Report_complete.pdf

²³ http://www.nerc.com/docs/mrc/Standard_Process_Input_Group-May_9_2012_FINAL.pdf

Formalize Rapid Revision Process

The Standards Committee used the draft “Rapid Revision” process in 2011 to successfully develop a permanent modification to a standard as an alternative to processing a request for interpretation. During the first quarter of 2012, the Standards Committee identified three additional requests for interpretation as candidates for Rapid Revision. The Standards Committee expects to use these additional projects to complete “field testing” of the draft procedure and will then formalize the Rapid Revision process in the Reliability Standards development process. This process uses the normal standard development process, but the initial formal 30-day comment period is waived because a “Rapid Revision” project is defined as a narrow revision to a standard that should not require as much industry technical vetting as more comprehensive revisions.

Internal Controls in Standards Development

In addition to the Standards Process improvement efforts, NERC staff is also working with stakeholders to facilitate registered entity internal controls programs as part of the standards development process. Historically, the ERO’s standards and compliance enforcement framework and related processes focused on the individual instances of non-compliance with standards without taking into account the existing or absence of the registered entity’s internal compliance controls program. For standards that cover a high volume process, compliance enforcement processes focused on individual instances of noncompliance may not sufficiently support the intended reliability objective, create significant administrative burdens and costs due to the enormous amount of data that must be organized and retained and do not necessarily assure future performance. The consideration of internal controls in standards development is a forward looking mechanism. Integrating internal controls recognition into standards development will facilitate a more programmatic approach to compliance auditing, reduce reliance on enforcement of individual instances of non-compliance, and reduce the administrative burdens and costs to both stakeholders and the ERO in connection with compliance enforcement.

Cost Effectiveness Analysis

The SPIG has also recommended that an effort to implement a cost effectiveness review of standards proposals be undertaken. The Standards Committee Process Subcommittee has formed a small team to review an initiative by Northeast Power Coordinating Council (NPCC) to consider cost effectiveness during the development of proposed regional standards. The small team is developing a procedure that will allow consideration of cost impacts associated with reliability standards during the standard development process.

Realignment of Quality Review to Occur Earlier in Standards Development

While the results of the quality review step added to the standards process have improved the overall quality of standards posted for comment, drafting teams and quality review volunteers have recommended moving the support provided by reviewers earlier in the process, before the team finalizes its initial draft of a proposed standard. The Standards Committee plans to assign additional industry personnel to newly formed drafting teams to provide legal and compliance support as the initial draft of the standard is developed. This modification improves efficiency in the standards development process.

Project Management

A structured project management environment has been created to manage standards development. The standards staff is working with the Standards Committee to ensure that the number and complexity of standards posted for comment and ballot at the same time do not exceed the ability of stakeholders to provide constructive, timely comments needed to reach technical consensus.

2013 Goals and Deliverables

In 2013, NERC will focus standards development in two areas: (1) develop risk-based standards focused on key reliability outcomes under the prioritization process first adopted in 2011 and (2) meet regulatory obligations for standards development and revisions, as specified in regulatory directives. Significant department activities will include:

- Working with industry to implement process changes emanating from the SPIG process and the Reliability Issues Steering Committee to improve the efficiency and timeliness of standards development such that high priority reliability risk mitigating standards may be targeted for completion. The objective of a one-year standards development cycle will be pursued.
- Implementing process changes proposed by the FERC in 2012 to identify and slate for removal administrative requirements from existing standards where feasible and improve the throughput of the standards development process, particularly with respect to emerging reliability risks while reducing the burden on industry.
- Supporting the three-year Standards Development Plan, including development of prioritized standards and the continuing transition to results-based standards.
- Responding on an accelerated basis to (and reducing the backlog of) FERC standards related directives. Current forecasts predict 2018 for completion of the backlog, which is deemed to be too long.
- Supporting the tracking and reporting on the status of directives and filing the required Directives Report with the Commission.
- Providing technical comments in the standards development process.
- Increasing coordination with compliance and enforcement functions in standards development by bringing compliance considerations into the standards drafting process through simultaneous drafting of RSAWs and technical guides to aid industry application of standards.

Resource Requirements

Personnel

As part of a three-year plan, commencing in 2010, the NERC Standards Program area began to re-align its organization based on key drivers for success (improved quality and timeliness in standard development, improved accuracy and quality of web-based information, and improved stakeholder outreach); to create clear accountability for accomplishing the program

mission at the strategic and tactical level; to enhance organizational efficiency in decision-making and execution; and to create a sustainable level of program activities and output.

NERC Standards Program Area management is also continually considering ways to improve the efficiency of standards development activities. In 2010, NERC gained regulatory approval of the new *Standard Processes Manual* which adopted changes, consistent with ANSI requirements, for standards development and provided the potential to shorten standards development timeframes. In 2011, NERC finished and gained approval of the initial standards development prioritization effort. Also in 2011 and continuing into 2012, NERC initiated the standards "rapid development" initiative intended to assist in the development of key standards in a shorter amount of time (targeted for a year or less). However, even with these recent process improvements, there continues to be wide spread recognition that further changes in the standards development process to improve quality and increase through-put are needed.

Additionally, management proposes to increase staff to allow an appropriate focus in the areas of project management, facilitation, and technical writing (all areas recommended by the SPIG). This will include hiring additional resources with the appropriate credentials, as well as training and/or credentialing existing personnel.

Management proposes adding three (3) additional personnel to the Standards Program area in 2013. The three additional positions and their functions are:

- Two standards development advisors to increase the number of concurrent standards development projects that can be processed in support of the corporate goals of developing technically sufficient results-based reliability standards, working with industry to develop options to improve the efficiency and timeliness of standards development, as well as develop technical references or application guides for reliability standards to ensure clarity and facilitate implementation.
- One standards specialist with technical writing skills to aid drafting teams in the drafting of standards and associated documents developed during the standard development process. This resource addition will facilitate improvement in the quality of the standards from the initiation of the effort (rather than relying solely on drafting teams drawn from the industry and reduce the inefficiency resulting from subsequent revisions during later stages in standards processing). The standards specialist will help drafting teams document the technical justification for proposed requirements, will help drafting teams develop effective webinar presentations, and will also provide assistance in verifying the accuracy of drafting team documents posted for public review. This additional resource support will enable NERC to improve the quality of standards to reduce ambiguity, and improve compliance and reliability outcomes.
- The overall increase of 1.58 FTEs is the result of phasing of new hires during the year and the elimination of the chief reliability officer position and support staff which was partially allocated to this program area.

Contractors and Consultants

\$150k has been included in the 2013 contractor and consulting budget to support the SPIG initiatives described above.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
RELIABILITY STANDARDS					
	2012	2012	Variance	2013	Variance
	Budget	Projection	2012 Projection	Budget	2013 Budget
			v 2012 Budget		v 2012 Budget
			Over(Under)		Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ 9,152,737	\$ 9,152,737	\$ -	\$ 9,156,330	\$ 3,593
Penalty Sanctions	-	-	-	510,788	510,788
Total NERC Funding	\$ 9,152,737	\$ 9,152,737	\$ -	\$ 9,667,118	\$ 514,381
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	40,500	40,500	104,000	104,000
Interest	3,864	3,773	(91)	3,970	106
Miscellaneous	-	341	341	-	-
Total Funding (A)	\$ 9,156,601	\$ 9,197,351	\$ 40,750	\$ 9,775,088	\$ 618,487
Expenses					
Personnel Expenses					
Salaries	\$ 3,454,036	\$ 2,923,323	\$ (530,713)	\$ 3,335,519	\$ (118,517)
Payroll Taxes	222,559	187,744	(34,815)	213,052	(9,507)
Benefits	403,907	318,533	(85,374)	350,484	(53,423)
Retirement Costs	489,648	339,904	(149,744)	362,334	(127,314)
Total Personnel Expenses	\$ 4,570,150	\$ 3,769,504	\$ (800,646)	\$ 4,261,388	\$ (308,762)
Meeting Expenses					
Meetings	\$ 107,850	\$ 148,350	\$ 40,500	\$ 164,000	\$ 56,150
Travel	447,625	305,674	(141,951)	372,500	(75,125)
Conference Calls	108,500	72,795	(35,705)	108,500	-
Total Meeting Expenses	\$ 663,975	\$ 526,818	\$ (137,157)	\$ 645,000	\$ (18,975)
Operating Expenses					
Consultants & Contracts	\$ 15,000	\$ -	\$ (15,000)	\$ 150,000	\$ 135,000
Office Rent	-	-	-	-	-
Office Costs	57,818	88,046	30,228	77,850	20,032
Professional Services	-	684	684	-	-
Miscellaneous	1,000	1,000	-	500	(500)
Depreciation	-	-	-	-	-
Total Operating Expenses	\$ 73,818	\$ 89,730	\$ 15,912	\$ 228,350	\$ 154,532
Total Direct Expenses	\$ 5,307,943	\$ 4,386,052	\$ (921,891)	\$ 5,134,738	\$ (173,205)
Indirect Expenses	\$ 4,011,842	\$ 4,165,963	\$ 154,121	\$ 4,581,241	\$ 569,399
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ 9,319,785	\$ 8,552,015	\$ (767,770)	\$ 9,715,979	\$ 396,194
Change in Assets	\$ (163,184)	\$ 645,336	\$ 808,520	\$ 59,109	\$ 222,293
Fixed Assets					
Depreciation	\$ -	\$ -	\$ -	\$ -	\$ -
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	\$ (163,184)	(82,689)	80,495	59,109	222,293
Inc(Dec) in Fixed Assets (C)	(163,184)	(82,689)	80,495	59,109	222,293
TOTAL BUDGET (=B + C)	\$ 9,156,601	\$ 8,469,326	\$ (687,275)	\$ 9,775,088	\$ 618,487
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ -	\$ 728,025	\$ 728,025	\$ -	\$ -
FTEs	24.92	22.31	(2.61)	26.50	1.58

Summary of Variances by Category – 2013 Budget Compared to the 2012 Budget

- **Personnel** – Total Personnel Expenses are projected to decrease in 2013 due to lower average salary costs and lower benefit and retirement costs that are the result of changes to NERC’s employee benefit and retirement plans.
- **Meetings** – Includes the cost of workshops sponsored by the Standards Program. In 2012 and prior years, workshop expenses and the offsetting fees collected were budgeted in the Training Department but in 2013, workshop expenses and the offsetting fees are budgeted in the Program or Department sponsoring the event. In addition to workshops, Meeting Expenses also includes costs of the Standards Committee meetings and standards drafting team meetings.
- **Contractors and Consultants** – The increase is to support the SPIG initiatives as described above.

Compliance Monitoring and Enforcement and Organization Registration and Certification

The Compliance Monitoring and Enforcement and Organization Registration and Certification Program carries out the ERO's statutory responsibility to monitor, enforce and achieve compliance with mandatory bulk power system reliability standards that have been developed, adopted and approved through the Reliability Standards Development program and placed into effect pursuant to orders of the Commission or to applicable governmental authorities in North America. This statutory responsibility is set forth in section 215(e) of the Federal Power Act as well as 18 C.F.R. §39.7. The Compliance Monitoring and Enforcement and Organization Registration and Certification Program includes the Organization Registration function, which is necessary to monitoring and enforcing compliance with mandatory reliability standards because it provides for the registration of bulk power system users, owners and operators as responsible to perform specified reliability functions to which requirements of mandatory reliability standards are applicable, thereby identifying the specific entities that are responsible to comply with the requirements of specific reliability standards. The Compliance Monitoring and Enforcement and Organization Registration and Certification Program also includes the Organization Certification function, which is necessary to monitoring and enforcing compliance with mandatory reliability standards because bulk power system users, owners and operators performing certain reliability functions (specifically, reliability coordinators, transmission operators, and balancing authorities) must be certified as having the personnel, knowledge, facilities, programs and other qualifications to carry out these important responsibilities. Requirements and activities for the Compliance Monitoring and Enforcement and Organization Registration and Certification Program are embodied in the following Commission-approved sections and appendices of the NERC ROP: ROP sections 400 (Compliance Monitoring and Enforcement), and 500 (Organization Registration and Certification), and Appendices 4A, 4B, 4C, 4D, 5A and 5B.

For 2011 and 2012, the Compliance Monitoring and Enforcement and Organization Registration and Certification Program was divided into three departments for operational and financial reporting purposes: (1) the Compliance Operations department; (2) the Enforcement department; and (3) Event Analysis and Investigations. Each of these departments continues to operate and has separate personnel and budgets. In 2012, NERC undertook an internal reorganization and grouped the Event Analysis department and Situation Awareness department under common leadership to better align the technical expertise within NERC to evaluate the reliability risk of events and disturbances. Financial information is being reported at the department level in order to facilitate year over year comparison.

Compliance Operations

Compliance Operations (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	21.66	24.00	2.34
Direct Expenses	\$ 4,733,724	\$ 4,787,043	\$ 53,320
Indirect Expenses	\$ 3,487,018	\$ 4,149,048	\$ 662,030
Other Non-Operating Expenses	\$ -	\$ -	\$ -
Inc(Dec) in Fixed Assets	\$ (360,718)	\$ (7,098)	\$ 353,621
TOTAL BUDGET	\$ 7,860,024	\$ 8,928,994	\$ 1,068,971

Background and Scope

NERC's Compliance Operations department works jointly with the Regional Entities to ensure that mandatory compliance monitoring programs are effective and efficient. The department also supports industry efforts to establish and maintain targeted internal standards compliance programs.

The Compliance Operations department is responsible for the following activities and functions:

- ERO registration and certification programs, including education programs that support industry compliance, and the integration of internal controls;
- Development of the annual Compliance Monitoring and Enforcement Program (CMEP) Implementation Plan and Actively Monitored List (AML)
- Oversight of the Regional Entities' delegated compliance functions including:
 - CMEP planning, implementation, and reporting
 - Compliance operations and coordination
 - Auditor training
- Development and maintenance of Reliability Standards Audit Worksheets (RSAWs); and
- Support for the Operating (OC) and the Compliance and Certification Committees (CCC).
- Investigating bulk power system events in support of NERC's compliance operations, oversight and enforcement activities

The department is making headway on its priority to streamline processes and products related to compliance monitoring activities in order to increase industry-wide consistency in practices and clarify compliance expectations.

One major achievement the department has made is the development of a risk-based compliance monitoring program for audited reliability standards. NERC and the Regional

Entities refined the tiered approach for initial audit scope based on a greater analysis of historical compliance and enforcement data, events analysis data, major event review, and top reliability risks. Providing Regional Entities the ability to focus compliance monitoring on an accurate, targeted, where-needed basis is essential for maximizing industry resources and focusing on the safety and reliability of the bulk power system.

2013 Goals and Deliverables

Registration Efficiencies

Throughout 2013, the Compliance Operations department, in coordination with the Regional Entities, will continue registered entity mapping activities to ensure the registry criteria is accurate and that gaps and duplicative registration and compliance monitoring do not occur. NERC takes its obligation seriously to ensure that all entities that should be registered are accounted for.

Part of that obligation includes enabling the registration process to be flexible and cost-effective. This is one way to increase the likelihood that applicable entities of all sizes and resource levels are able to become registered. Appropriate registration is critical to compliance monitoring activities and to enforcement activities, because it equates to better use of resources at both the registered entity level in the implementation of compliance programs, and at the Regional level in regard to overall compliance monitoring efforts.

Effective Compliance Programs and Reliability Risk Controls

The Compliance Operations department will continue efforts to ensure that all registered entities understand their compliance obligations and how compliance will be assessed. NERC staff will continue its work in reducing the variety of compliance documents currently produced and making the primary compliance tool the Reliability Standard Audit Worksheet (RSAW). An RSAW must provide sufficient information so that an auditor is able to assess compliance; as well, an entity should be able to utilize an RSAW as a tool to measure its compliance and prepare for an audit. NERC Compliance staff will continue its collaboration with industry early in the standards development process to provide suggestions to the drafting teams to include information on how compliance will be assessed. This will better ensure that an RSAW is in fact a supplement to the standard; and not expansive or additive to the requirements. After the NERC Board of Trustees approves a reliability standard and before the standard's effective date, NERC will conduct compliance trials to provide auditors and industry clear expectations of compliance.

NERC's long-term goal is for registered entities to have effective compliance programs and internal controls. Greater consideration of internal controls in the compliance monitoring program is a proactive and forward-looking method of supporting reliability. NERC, the Regional Entities, and industry collaborated to improve the risk-based compliance monitoring program. The result is an Entity Impact Evaluation template that will support a consistent, risk-based approach to how registered entities can be assessed and how compliance monitoring activities may be scoped. As this component of the risk-based compliance monitoring program matures, NERC will rely on industry volunteers for participation.

Effective Compliance Monitoring

The core concept of risk-based compliance monitoring is to provide guidance to Regional Entities regarding how to appropriately scope compliance monitoring activities and methods (frequency and scope of standards to be monitored) based on each entity's potential impact to the bulk power system. Through continued refinement of the risk-based compliance monitoring program, NERC seeks to ensure that registered entities are monitored in a cost-effective manner. Through pilot testing, NERC will identify and assess alternative risk-based approaches to monitoring compliance, such as the use of sampling methods. The ERO will encourage registered entities to use the Entity Impact Evaluation template as a self-assessment tool and to engage in discussions with their Regional Entities on appropriate compliance monitoring activities. The ERO will continuously assess the Actively Monitored List based on reliability trends, risks, and historical information and data to ensure that the focus remains on the most critical reliability standards.

Auditor Training

NERC will develop highly qualified and trained compliance operations and auditing staffs at NERC and the Regional Entities by: (1) increasing the qualifications for auditing, investigations, enforcement, certification evaluation, and other essential compliance roles; (2) improving training for certification teams; and (3) providing training on auditing, investigating, root cause, and human factors analysis. NERC will continue to conduct two ERO Compliance Enforcement Authority auditor workshops a year, each followed by a CIP auditor technical workshop. Two additional CIP auditor workshops will be held, for a total of four in 2013. Two auditor workshops for industry will also be conducted. NERC will hold two audit team lead courses per year and ensure all new ERO auditors complete initial integration training prior to participating in an audit.

NERC compliance auditor training is based on the United States Government Accountability Office (GAO) Generally Accepted Government Auditing Standards (GAGAS) for performance audits. The compliance auditor training material will continue to be improved based on feedback from compliance audit experiences and changes to the GAO GAGAS, the CMEP, and other NERC Rules of Procedure. A major focus for auditor training in 2013 will also include the consideration of internal controls at the entity and in auditing processes.

Support to Standards Development

In an effort to mitigate the need for additional compliance guidance documents after the implementation of a standard, the Compliance Operations department will provide greater support upfront during the standards development process. One way this will be accomplished is by providing compliance and enforcement information, statistics, and perspectives to standard drafting teams to foster the development of standards that provide an increased reliability benefit and clarifying compliance risks. For each Standards Authorization Request that is approved in 2013, NERC Compliance will similarly provide drafting teams with information to consider in the development of an RSAW.

Compliance application consistency issues or trends that arise either by CEA staff or from industry will continue to be assessed and passed to the NERC standards department for inclusion in the standards issue database.

Regional Entity Audit Oversight

NERC staff will oversee approximately 32 Regional Entity audits in 2013—generally two per Region for CIP and two per Region for operations and planning standards. The Compliance Operations department will also conduct two Key Reliability Standard Spot Checks—one for an operations and planning standard, and one for a CIP standard.

Investigation of Events

The Compliance Operations Department also includes personnel dedicated to the investigation of bulk power system events in support of NERC's compliance operations and enforcement activities.

Resource Requirements

The Compliance Operations department is not proposing the addition of staff or an increase in its contractor and consulting budget in 2013. The increase in FTEs is due to: (1) the transfer of 6.0 FTEs from Events Analysis dedicated to the investigation of bulk power system events; (2) the elimination of the chief reliability officer position and support staff, which had been partially allocated to the Compliance Operations department in 2012; (3) the transfer of one position to the Information Technology Department; and (4) the transfer of one position to the corporate support function in within the General and Administrative Program Area. The department's budget for outside auditor support has been consolidated with the contractor and consulting budget for NERC's risk management and internal control function within the Finance department.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
COMPLIANCE OPERATIONS, INVESTIGATIONS and ORGANIZATION REGISTRATION and CERTIFICATION					
	2012 Budget*	2012 Projection*	Variance 2012 Projection v 2012 Budget Over(Under)	2013 Budget	Variance 2013 Budget v 2012 Budget Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ 7,990,371	\$ 7,990,371	\$ -	\$ 8,422,798	\$ 432,427
Penalty Sanctions	-	-	-	462,601	462,601
Total NERC Funding	\$ 7,990,371	\$ 7,990,371	\$ -	\$ 8,885,399	\$ 895,028
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	36,025	36,025	40,000	40,000
Interest	3,358	3,078	(280)	3,596	238
Miscellaneous	-	278	278	-	-
Total Funding (A)	\$ 7,993,729	\$ 8,029,752	\$ 36,023	\$ 8,928,994	\$ 935,265
Expenses					
Personnel Expenses					
Salaries	\$ 3,022,812	\$ 2,404,759	\$ (618,053)	\$ 3,202,041	\$ 179,229
Payroll Taxes	191,988	151,248	(40,740)	202,103	10,115
Benefits	353,659	245,736	(107,923)	325,579	(28,080)
Retirement Costs	423,911	262,416	(161,495)	368,031	(55,880)
Total Personnel Expenses	\$ 3,992,369	\$ 3,064,159	\$ (928,210)	\$ 4,097,754	\$ 105,385
Meeting Expenses					
Meetings	\$ 31,175	\$ 84,785	\$ 53,610	\$ 80,000	\$ 48,825
Travel	416,000	252,022	(163,978)	440,500	24,500
Conference Calls	34,235	27,327	(6,908)	34,235	-
Total Meeting Expenses	\$ 481,410	\$ 364,134	\$ (117,276)	\$ 554,735	\$ 73,325
Operating Expenses					
Consultants & Contracts	\$ -	\$ 9,780	\$ 9,780	\$ -	\$ -
Office Rent	-	-	-	-	-
Office Costs	39,063	49,857	10,794	73,424	34,361
Professional Services	-	558	558	-	-
Miscellaneous	2,000	2,000	-	500	(1,500)
Depreciation	218,882	197,203	(21,679)	60,630	(158,252)
Total Operating Expenses	\$ 259,945	\$ 259,399	\$ (546)	\$ 134,554	\$ (125,391)
Total Direct Expenses	\$ 4,733,724	\$ 3,687,691	\$ (1,046,033)	\$ 4,787,043	\$ 53,319
Indirect Expenses	\$ 3,487,018	\$ 3,398,500	\$ (88,518)	\$ 4,149,048	\$ 662,030
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ 8,220,742	\$ 7,086,191	\$ (1,134,551)	\$ 8,936,092	\$ 715,349
Change in Assets	\$ (227,013)	\$ 943,561	\$ 1,170,574	\$ (7,098)	\$ 219,916
Fixed Assets					
Depreciation	(218,882)	(197,203)	21,679	(60,630)	158,252
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	0
Equipment CapEx	-	-	-	-	0
Leasehold Improvements	-	-	-	-	0
Allocation of Fixed Assets	\$ (141,836)	\$ (67,456)	74,380	53,532	195,369
Inc(Dec) in Fixed Assets (C)	\$ (360,718)	\$ (264,659)	\$ 96,059	\$ (7,098)	\$ 353,621
TOTAL BUDGET (=B + C)	\$ 7,860,024	\$ 6,821,532	\$ (1,038,492)	\$ 8,928,994	\$ 1,068,970
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ 133,705	\$ 1,208,220	\$ 1,074,515	\$ -	\$ (133,705)
FTEs	21.66	18.20	(3.46)	24.00	2.34

*The 2012 Budget and projected expenses from September to December, 2012 of the Event Investigations Team have not been calculated and are therefore not included with the 2012 Budget or 2012 Projection for Compliance Operations, Investigations and Organization Registration and Certification.

Summary of Variances by Category – 2013 Budget Compared to the 2012 Budget

- Personnel Expenses** – The increase in Salary and Payroll Tax expense is related to an increase of 2.34 FTEs in the department due to transfers from other departments in 2012. Lower average costs per FTE for Benefits and Retirement due to changes in NERC's employee benefit and retirement plans resulted in lower projected costs in 2013. Meetings expense includes the cost of the Compliance Auditor workshops and meetings of the Compliance and Certification Committee. \$40k in projected workshop fees offset the \$48.8k increase in meetings expense.

Compliance Enforcement

Compliance Enforcement (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	21.00	21.00	-
Direct Expenses	\$ 3,284,789	\$ 3,047,746	\$ (237,042)
Indirect Expenses	\$ 3,380,765	\$ 3,630,417	\$ 249,652
Other Non-Operating Expenses	\$ -	\$ -	\$ -
Inc(Dec) in Fixed Assets	\$ (137,515)	\$ 46,841	\$ 184,355
TOTAL BUDGET	\$ 6,528,039	\$ 6,725,004	\$ 196,966

Background and Scope

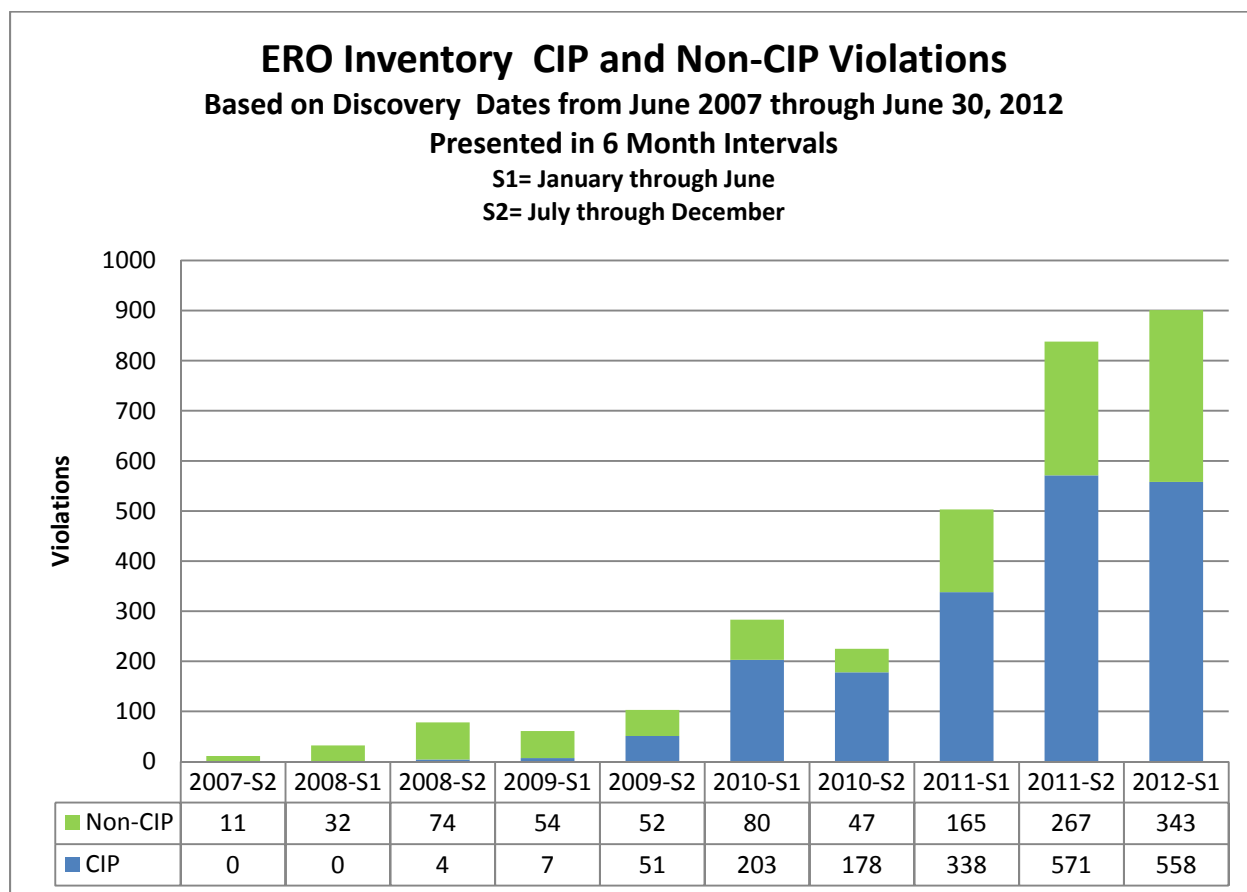
NERC's Compliance Enforcement department conducts all of NERC's enforcement activities, including:

- Docketing of all possible violations coming into the NERC enforcement program;
- Processing of compliance violation matters arising out of NERC-led investigations and audits;
- Reviewing all mitigation plans accepted and dismissals approved by Regional Entities;
- Processing of all compliance violations arising out of Regional Entity compliance, enforcement and monitoring activities; and
- Analyzing compliance statistics.

A priority for this department is to achieve greater efficiencies in enforcement processing by ensuring Possible Violations are mitigated and, at the same time, focusing both NERC and Regional Entity compliance enforcement resources on the cases that have the greatest impact on the reliability of the bulk power system.

NERC and the Regional Entities have made steady progress in closing out older cases in the outstanding caseload (violations that have not been filed with FERC, including those on hold

due to related jurisdictional issues).²⁴ Through June 30, 2012, NERC has reduced its outstanding caseload of violations discovered prior to January 1, 2011 (excluding those on hold due to related jurisdictional issues) by approximately 50 percent. As reflected in the figure below, less than ½ percent of the currently active violations were discovered in 2007 (11 of 3,035), less than 4 percent (110 of 3,035) were discovered in 2008, and about 5 percent (164 of 3,035) were discovered in 2009. Thus, about 74 percent of the current caseload is comprised of violations that were discovered in the 18-month period January 2011 to June 2012 and 57 percent (1,739 of 3,035) were discovered in the last 12 months.



2013 Goals and Deliverables

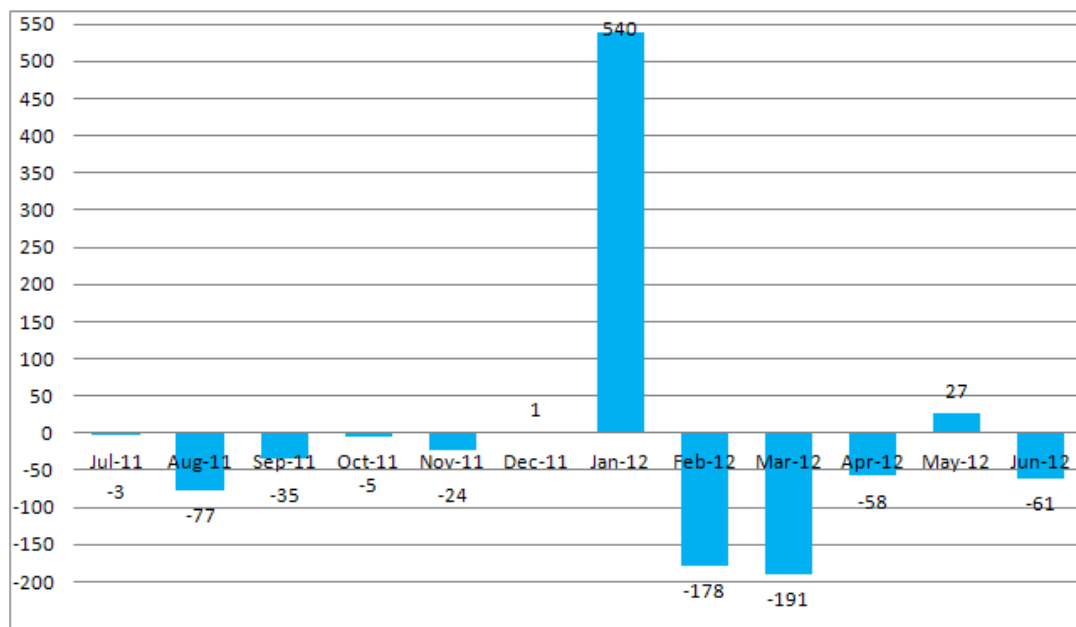
Increased Processing Efficiencies

Throughout 2013, NERC Compliance Enforcement will seek to develop further mechanisms to enhance processing efficiency. NERC has introduced two new concepts in enforcement processing through its Compliance Enforcement Initiative (CEI): the Spreadsheet NOP (SNOP), and Find, Fix, Track, and Report (FFT). These new approaches are designed to expedite and streamline violation processing, which allows focus to be re-directed to those risks that have the greatest impact on the reliability of the bulk power system. Implementation of these

²⁴ A summary of NERC and the Regional Entity caseload showing all current outstanding violations, summarized by state and Region as of June 30, 2012, is set forth following the Statement of Activities for this department. On July 19, 2012, the Commission issued its order upholding the assessment of a penalty against a federal entity. N. Am. Elec. Reliability Corp., 140 FERC ¶ 61,048 (2012). The cases on hold were awaiting the issuance of that decision. Requests for rehearing and a motion for stay remain pending before the Commission.

initiatives has reduced the overall ERO enforcement caseload and should allow NERC to close out cases more expeditiously to provide timely lessons learned to the industry. In recent months, due to the new CEI processes, the monthly processing rate (which includes both filed and dismissed violations) has resulted in more violations being processed than submitted in nine of the last 12 months, as shown in the chart below.

Violation Processing Within 12 Months



	Jul-11	Aug-11	Sep-11	Oct-11	Nov-11	Dec-11	Jan-12	Feb-12	Mar-12	Apr-12	May-12	Jun-12
New	211	166	262	247	212	203	693	229	168	106	194	149
Dismissed	89	123	79	93	105	57	24	269	209	39	53	68
Filed	125	120	218	159	131	145	129	138	150	125	114	142
Total Dismissed and Filed	214	243	297	252	236	202	153	407	359	164	167	210
Violation Processing	-3	-77	-35	-5	-24	1	540	-178	-191	-58	27	-61

Sustain and Expand CEI Processes

Throughout the remainder of 2012 and into 2013, NERC Compliance Enforcement will be focusing efforts on ensuring the sustainability and expandability of the FFT process. Sustainability requires that there be consistency in application. NERC intends to promote consistency through a series of training and outreach sessions for Regional Entity enforcement and compliance staff on the identification and disposition of possible violations as FFTs. Expandability not only applies to who may identify FFTs but also an expansion of the effectiveness of the program. Beginning in 2013, NERC will be expanding FFT identification to CEA compliance staff. CEA compliance staff will be able to recommend possible violations for FFT treatment to CEA enforcement staff. NERC anticipates that expanding FFT identification will broaden the range of issues that will be afforded FFT treatment much earlier in the compliance monitoring and enforcement process. This earlier identification will likely improve

mitigation results as there will be an increased incentive to mitigate minimal risk issues earlier on to qualify for FFT treatment. Faster identification and application of mitigation activities will result in improved reliability.

Reduction of Outstanding Caseload

Another aspect of caseload management is the timely processing of all violations, particularly those that pose greater risk to the bulk power system, and to provide lessons learned to the industry. Early dissemination of violation information to registered entities will enable them to learn from prior events and violations so they may take action to eliminate similar risks that may occur elsewhere on the bulk power system. There are approximately 793 possible violations spanning 2007 through 2010 (including those on hold due to related jurisdictional issues) of CIP and non-CIP standards that have not been filed with FERC. NERC Compliance Enforcement has initiated an effort to identify these aging possible violations and to identify the reason for their processing delay and identify which possible violations pose the greatest risk to reliability. Compliance Enforcement plans to work with the Regional Entities to significantly reduce this prior caseload by bringing the possible violations to closure and thereby provide information on prior violations to registered entities throughout the remainder of 2012 and in 2013.

Violation Trend Analysis

In 2013, Compliance Enforcement also plans to identify the causes and trends of violations in enforcement cases. Over the past five years, NERC has been collecting violations processing information in its Compliance Reporting and Tracking System (CRATS) database. This database now contains a significant amount of information pertaining to the facts and circumstances, risk evaluation and mitigation activities of prior violations. Review and evaluation of this information can yield insight into the effectiveness of NERC and the Regional Entities' training programs, registered entities application of past lessons learned and the NERC Reliability Standards in ensuring reliability, and thereby support the ERO's statutory responsibility to monitor, enforce and achieve compliance with mandatory reliability standards by bulk power system users, owners, and operators. Analysis of the information contained in NERC's CRATS database should enable NERC Compliance Enforcement to provide guidance on where additional training may be needed or where revisions to the standards could promote greater clarity.

Resource Requirements

Personnel

Departmental and Regional Entity resource enforcement capabilities have increased through the addition of staff over the past several years. Beginning in September 2011, NERC also introduced several new concepts in enforcement processing through its Compliance Enforcement Initiative. These new approaches are designed to expedite and streamline violation processing for minimal risk violations, which allow focus to be re-directed to those areas that have the greatest impact on the reliability of the bulk power system. It is still too early in the implementation of these approaches to determine the degree of overall efficiencies that will be gained. However, it is anticipated that the result will be a downward pressure on future enforcement staffing requirements in the 2014-2015 timeframe. As this timeframe is

approached, enforcement objectives and the commensurate resource requirements will be re-evaluated. No further enforcement resource additions are being proposed by NERC in 2013.

Contractor Expenses

No contractor or consulting resources are proposed within the group for 2013. Resource requirements associated with improvements to the applications supporting the department's compliance reporting, analysis and tracking needs have are budgeted under the IT department.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
COMPLIANCE ENFORCEMENT					
	2012	2012	Variance		Variance
	Budget	Projection	2012 Projection	2013	2013 Budget
			v 2012 Budget		v 2012 Budget
			Over(Under)		Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ 6,442,202	\$ 6,442,202	\$ -	\$ 6,317,083	\$ (125,119)
Penalty Sanctions	-	-	-	404,776	404,776
Total NERC Funding	\$ 6,442,202	\$ 6,442,202	\$ -	\$ 6,721,858	\$ 279,656
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	3,256	3,125	(131)	3,146	(110)
Miscellaneous	-	282	282	-	-
Total Funding (A)	\$ 6,445,458	\$ 6,445,610	\$ 152	\$ 6,725,004	\$ 279,546
Expenses					
Personnel Expenses					
Salaries	\$ 2,310,485	\$ 1,967,734	\$ (342,751)	\$ 2,152,370	\$ (158,115)
Payroll Taxes	158,938	126,973	(31,965)	140,794	(18,144)
Benefits	334,684	245,172	(89,512)	274,883	(59,801)
Retirement Costs	329,353	210,686	(118,667)	247,200	(82,153)
Total Personnel Expenses	\$ 3,133,460	\$ 2,550,565	\$ (582,895)	\$ 2,815,246	\$ (318,214)
Meeting Expenses					
Meetings	\$ -	\$ 100	\$ 100	\$ 5,000	\$ 5,000
Travel	128,000	148,484	20,484	186,000	58,000
Conference Calls	-	6,620	6,620	-	-
Total Meeting Expenses	\$ 128,000	\$ 155,204	\$ 27,204	\$ 191,000	\$ 63,000
Operating Expenses					
Consultants & Contracts	\$ -	\$ -	\$ -	\$ -	\$ -
Office Rent	-	-	-	-	-
Office Costs	23,329	37,828	14,499	41,000	17,671
Professional Services	-	480	480	-	-
Miscellaneous	-	1,000	1,000	500	500
Depreciation	-	-	-	-	-
Total Operating Expenses	\$ 23,329	\$ 39,308	\$ 15,979	\$ 41,500	\$ 18,171
Total Direct Expenses	\$ 3,284,789	\$ 2,745,076	\$ (539,713)	\$ 3,047,746	\$ (237,043)
Indirect Expenses	\$ 3,380,765	\$ 3,450,784	\$ 70,019	\$ 3,630,417	\$ 249,652
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ 6,665,554	\$ 6,195,861	\$ (469,693)	\$ 6,678,163	\$ 12,609
Change in Assets	\$ (220,096)	\$ 249,749	\$ 469,845	\$ 46,841	\$ 266,937
Fixed Assets					
Depreciation	-	-	-	-	-
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	0
Equipment CapEx	-	-	-	-	0
Leasehold Improvements	-	-	-	-	0
Allocation of Fixed Assets	\$ (137,515)	\$ (68,494)	69,021	46,841	184,355
Inc(Dec) in Fixed Assets (C)	\$ (137,515)	\$ (68,494)	\$ 69,021	\$ 46,841	\$ 184,355
TOTAL BUDGET (=B + C)	\$ 6,528,039	\$ 6,127,367	\$ (400,673)	\$ 6,725,004	\$ 196,965
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ (82,582)	\$ 318,243	\$ 400,824	\$ -	\$ 82,582
FTEs	21.00	18.48	(2.52)	21.00	-

Summary of Variances by Category – 2013 Budget Compared to the 2012 Budget

- **Personnel Expenses** – Related to lower average salary expense per FTE and due to changes to NERC's employee benefit and retirement plans as previously described.
- **Travel Expenses** – Related to having full staff for the entire year.

A summary of NERC and the Regional Entity caseload showing all current outstanding violations, summarized by state and region as of June 30, 2012, is set forth in the table below.

FERC Enforceable Alleged Violations Summarized by Enforcement Process State As of June 30, 2012							
Region	Assessment and Validation	Confirmation and NERC Enforcement Action	Settlement	Filed and Awaiting Closing Actions	Completed and Closed	Dismissed	Total
FRCC	90	0	5	59	273	169	596
MRO	117	0	7	48	191	123	486
NCEA	17	0	0	8	41	62	128
NPCC	180	2	22	15	220	46	485
RFC	577	13	0	166	554	245	1555
SERC	450	19	108	42	372	201	1192
SPP	253	2	41	73	295	177	841
TRE	261	18	44	46	165	130	664
WECC	252	203	354	181	1398	1768	4156
TOTAL	2197	257	581	638	3509	2921	10103

Reliability Assessment and Performance Analysis

Reliability Assessments and Performance Analysis (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	16.50	18.75	2.25
Direct Expenses	\$ 4,437,752	\$ 4,516,620	\$ 78,868
Indirect Expenses	\$ 2,656,316	\$ 3,241,444	\$ 585,128
Other Non-Operating Expenses	\$ -	\$ -	\$ -
Inc(Dec) in Fixed Assets	\$ (125,208)	\$ 4,372	\$ 129,580
TOTAL BUDGET	\$ 6,968,860	\$ 7,762,436	\$ 793,575

Background and Scope

NERC's Reliability Assessments and Performance Analysis (RAPA) program carries out the ERO's statutory responsibility to conduct assessments of the reliability and adequacy of the bulk power system in North America. This statutory responsibility is embodied in section 215 of the Federal Power Act as well as 18 C.F.R. §39.11. The following sections of NERC's Commission-approved ROP pertain to the activities of the RAPA program: ROP sections 801 through 806 and 809 through 811. Further, as described in greater detail below, the activities of the RAPA program also support identification of reliability performance issues and areas of concern, (including equipment performance and reliability issues) for possible consideration in the development of new mandatory reliability standards or modification of existing standards through the Reliability Standards Development Program.

The RAPA program conducts annual seasonal and long-term reliability assessments, designed to assess existing and planned short and long-term resource adequacy and operating reliability. Further, the program identifies and assesses probability and severity of risks to reliability performance, measures progress in improving current reliability, tracks leading indicators of future reliability, develops risk control solutions, measures success of these solutions and provides risk-informed information into NERC's standards and compliance processes. Finally, RAPA provides engineering expertise on protection and control along with system analysis and modeling to simulate and study system disturbances, develop reliability guidelines, and support NERC Reliability Standards development. To support these activities, RAPA maintains detailed databases measuring the planned and ongoing reliability performance of generation, transmission and demand response resources.

RAPA also identifies and analyzes key emerging issues that may affect reliability, such as market practices; legislation; regulation; technology developments; high-impact, low-frequency (HILF) events; industry trends; interconnection-wide modeling improvement; and proposed public policy measures. RAPA documents these in special reliability assessments.

RAPA's resource needs are driven and supported by NERC's strategic plan, regulatory directives, the Board of Trustees, the Member Representatives Committee; and the Electricity Subsector Coordination Council; and the Planning, Operating, Critical Infrastructure Protection, Standards, and Compliance and Certification Committees' strategic work plans, as well as their subcommittees, working groups, and task forces.

Based on NERC and industry priorities, and to meet business planning goals, a number of issues and initiatives are not being pursued in 2013: probabilistic analysis of reserve margins for NERC's Long-term Reliability Assessment will be completed every two years rather than annually (none in 2013), the smart grid follow-on work plan will be taken up in 2014, transmission availability information (TADS) for 100-199 kV elements will be delayed until BES definition is completed, and wind generator availability information (GADS) will be re-programmed to the 2014-2015 time frame. To further, to improve effectiveness and efficiency, in 2013 RAPA will consolidate four reports into NERC's annual State of Reliability Report: the Post-Seasonal Reliability Assessment along with individual reports on transmission, generator and demand response data systems (TADS, GADS and DADS, respectively).

Further, RAPA will continue to leverage its activities with other organizations to amplify results and magnify the effectiveness of its efforts. For example, the Electric Power Research Institute (EPRI), Institute of Electrical and Electronic Engineers (IEEE) and the North American Transmission Forum (NATF) are providing a coordinated platform for NERC's GMD activities. Additionally, RAPA will continue to collaborate with the NATF on TADS, and both EPRI and IEEE on variable generation integration. Further, RAPA is partnering with the Interstate Natural Gas Association of America (INGAA) and the Natural Gas Supply Associations (NGSA) to study and address interdependency of gas and electric systems.

2013 Goals and Deliverables

- Issue reliability assessment reports, guidelines, recommendations and alerts as needed.
 - One 10-year Long-Term Reliability Assessment
 - Two seasonal assessments: Summer and Winter
 - Report on geomagnetic disturbance (GMD) bulk electric system effects and vulnerability assessment
 - Up to two additional special assessments addressing key reliability issues, such as:
 - Environmental regulations
 - Gas and electric interdependency and coordination
 - Changing resource mix
 - One Annual State of Reliability Report
 - Oversight of Generating, Transmission and Demand Response Availability Data Systems (GADS, TADS, and DADS), along with the Spare Equipment Database.

- Strengthen data collection and validation processes by designing, creating, testing, and implementing data checking systems for reliability assessment and risk analysis
- Provide quarterly updates on trends and measures of bulk electric system reliability
- Develop a risk registry and develop a systematic prioritization process. Develop control strategies and plans to address the highest priority existing or emerging risks to bulk electric system reliability.
- Support NERC Reliability Standard development and response to FERC Directives by providing technical and system analysis expertise.
- Support development of reliability standards to address deficiencies or needs revealed by reliability assessments and performance analysis.
- Provide support and leadership to the Planning Committee, and Standing Committees' subcommittees, working groups, and task forces serving the Standing Committees.
- Build and sustain an enterprise reliability assessment and performance analysis team.
- Depending on regulatory action, finalize Bulk Electric System and consequential load loss exception processes.

Resource Requirements

The department has not proposed incremental personnel or new contractor and consulting resources associated with the implementation of the bulk electric system (BES) exception process due to the uncertainty of the timing and impact on NERC's resource requirements. However, the BES exception process has been identified as a contingency for which operating reserves might be used to assist in the BES implementation process if necessary. For further information regarding the company's proposed Working Capital and Operating Reserve Policy and the amounts included for contingencies like BES please refer to Exhibit C.

Personnel

During 2012 the department added an engineer to support the reliability and system analysis activities and one engineer to spearhead NERC's bulk electric system risk identification and control strategy. The chart above reflects 2.25 FTE additions due to the full year effect of the timing of personnel additions in 2012.

In 2013, to further strengthen NERC's bulk electric system reliability risk processes, the department is proposing to add a risk control coordination specialist. This position will support NERC's initiatives to identify, evaluate and prioritize bulk power system risks as well as supporting NERC's special risk control project teams by providing project management and high-level risk measurement.

Contractor Expenses

The total projected contractor and consultant expenses for the department are projected at \$685k, which is below 2012 budgeted levels. The types of contractor and consultant resources required are generally consistent with historic needs and include support for the following:

- **Geomagnetic Disturbance (GMD) Vulnerability Assessment**

GMD is a concern to the North American bulk electric system due to potential to cause system disturbances and equipment damage. In an extreme case, GMD may cause wide spread electric disruption and damage a limited number of long-lead time equipment, such as transformers. Industry needs a clear understanding of the probable storm activity and system impact based on fact-based analysis to develop appropriate mitigation solutions. Additionally, an understanding of available technologies and operating procedures is needed to limit the extent and duration of GMD impact. This project's 2013 objectives are:

- Determine the likely impact of an extreme event on the North American bulk power system based on present system configuration, protection capability, and practices.
- Identify technologies and operating procedures available today to mitigate equipment damage, reduce the extent of the interruption, and speed recovery.

- **Scenario Consultant – Addressing Standing and Emerging Issues**

NERC will continue to develop ad-hoc Special and/or Scenario Assessments which are developed through the Emerging Issues process currently established in the LTRA.²⁵ Scenario assessments provide detailed quantitative and qualitative analyses which “stress” the reference planning case of the North American bulk power system. Scenario analysis can indicate the relative sensitivity of the *Reference Case* to changes in pre-specified conditions and may provide some insight into risks to Regional reliability. Based on feedback from FERC and industry, a deeper understanding is desired of the potential reliability implications from a focused spectrum of *Reference Case* sensitivities to measure the robustness of the *Reference Case* and to study potential impacts of scenarios on reliability.

Scenarios for Special Assessments are unknown at this time, but will focus on key reliability issues, such as:

- Environmental regulations;
- Gas and electric interdependency and coordination; and
- Changing resource mix.

- **Generator Controls Modeling**

Interconnection modeling and system protection and control improvement activities will continue into 2013. Work in 2013 will require engaging subject matter expert contractors in generation protection and control.

²⁵ **Special Assessments** are ad-hoc assessments focused on specific industry issues (emerging or standing). For these assessments, detailed quantitative and qualitative analysis, beyond what is included in the annual long-term and seasonal reliability assessments, is examined. These reports are generally published separately from the annual long-term and seasonal reliability assessments.

Scenario Assessments are ad-hoc assessments focused on specific, hypothetical industry conditions. For these assessments, detailed quantitative and qualitative analysis is performed which “stress” the Reference Case. Scenario assessments will be included as part of the annual long-term and seasonal reliability assessments to provide a sensitivity of potential outcomes.

- **Databases and Availability Systems**

- **Reliability Availability Data System (RADS) Assessment Database – Continued Development**

FERC has directed NERC to consider establishing permanent databases that could be automatically populated with: (i) new transmission projects data from the REs, (ii) generation interconnection queue data, and (iii) other data relevant for reliability assessment. The goal of the RADS is meet these requirements,²⁶ facilitating the collection of assessment area generation and transmission data used to quantify and analyze the reliability of the bulk power system in a standard, uniform method. The technical side of the RADS project, including database design, contractor selection, and acceptance testing will be managed cooperatively with the Regional Entities through the NERC Project Management Office (PMO). Specifications of the data to be collected in this system will be developed by the Reliability Assessment Data Working Group (RADWG). The RADS project was initiated and funded in NERC's FERC approved 2012 budget. These incremental funds will lead to its completion in 2013.

- **Metrics and Benchmarking Database – Enhancements and Maintenance**
Collects, records, and retrieves reliability metric information that quantifies characteristics of adequate level of reliability. The metric trends and performance analysis serve as technical input to Reliability Standards and project prioritization, compliance process improvement, event analysis, reliability assessment, and critical infrastructure protection.
- **Spare Equipment Database (SED) – Enhancements and Maintenance**
Collects and tracks spare long-lead time transformer information to used strengthen industry resiliency to withstand a significant event that damages large amounts of long lead time equipment The database provides industry a vital tool of communication and coordination for tracking spare equipment This ability will be extremely helpful in the aftermath of a HILF event, such as coordinated attack or extreme weather. Maintenance of the SED is specifically provided for in section 1003.2.4 of NERC's Commission-approved ROP.
- **Generation Availability Data System (GADS) – Enhancements and Maintenance**
Collects, records, and retrieves operating information on power plant availability, including event, performance, and design data. The information is used to support equipment reliability and availability analyses, as well as risk-informed decision making, including the reliability and adequacy of the bulk power system and the potential need for development of new or modified reliability standards. The 2013 budget reflects a reduction of \$250k in revenue from licensing the GADS software to third parties, which NERC no longer plans to actively pursue. In the event that NERC does receive revenue from third parties, these revenues will be captured as part of working capital.

²⁶ The Commission's directives to establish such databases are an example of an ERO activity that, as stated in the ERO Certification Order, is statutory because it is required by Commission order.

- **Transmission Availability Data System (TADS) – Enhancements and Maintenance**
Collects, records, and retrieves information used to measure transmission availability and performance. . This data is important to assessing the reliability and adequacy of the bulk power system and can also provide information indicating the need for development of new or modified reliability standards. The data reporting tool collects information about the transmission lines and transformers operating above 200kV, including outage details and cause codes
- **Demand Response Availability Data System (DADS) – Enhancements and Maintenance**
Collects demand response enrollment and event information to measure performance including its contribution to improved reliability, providing industry with a consistent basis for projecting contributions of dispatchable and non-dispatchable demand response supporting resource projections and operational reliability. Further, this data is important to assessing the reliability and adequacy of the bulk power system and can provide information indicating the need for development of new or modified reliability standards.

Exhibit B includes additional information regarding the amount of proposed contractor and consulting funding to support each of the above areas, together with a comparison to 2012 budgeted amounts.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
RELIABILITY ASSESSMENTS and PERFORMANCE ANALYSIS					
	2012	2012	Variance	2013	Variance
	Budget	Projection	v 2012 Budget	Budget	v 2012 Budget
			Over(Under)		Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ 6,716,302	\$ 6,716,302	\$ -	\$ 7,358,220	\$ 641,918
Penalty Sanctions	-	-	-	361,407	361,407
Total NERC Funding	\$ 6,716,302	\$ 6,716,302	\$ -	\$ 7,719,627	\$ 1,003,325
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	250,000	125,000	(125,000)	-	(250,000)
Workshops	-	-	-	40,000	40,000
Interest	2,558	2,838	280	2,809	251
Miscellaneous	-	256	256	-	-
Total Funding (A)	\$ 6,968,860	\$ 6,844,396	\$ (124,464)	\$ 7,762,436	\$ 793,576
Expenses					
Personnel Expenses					
Salaries	\$ 2,189,610	\$ 2,250,982	\$ 61,373	\$ 2,429,590	\$ 239,980
Payroll Taxes	141,720	140,061	(1,659)	150,215	8,496
Benefits	266,523	224,362	(42,161)	262,762	(3,761)
Retirement Costs	313,238	258,614	(54,624)	269,736	(43,502)
Total Personnel Expenses	\$ 2,911,090	\$ 2,874,019	\$ (37,071)	\$ 3,112,303	\$ 201,213
Meeting Expenses					
Meetings	\$ 12,500	\$ 77,285	\$ 64,785	\$ 78,000	\$ 65,500
Travel	369,375	356,273	(13,102)	410,000	40,625
Conference Calls	31,950	25,988	(5,962)	31,950	-
Total Meeting Expenses	\$ 413,825	\$ 459,546	\$ 45,721	\$ 519,950	\$ 106,125
Operating Expenses					
Consultants & Contracts	\$ 998,000	\$ 996,800	\$ (1,200)	\$ 685,000	\$ (313,000)
Office Rent	-	-	-	-	-
Office Costs	93,676	131,908	38,232	161,416	67,740
Professional Services	-	498	498	-	-
Miscellaneous	4,000	597	(3,404)	500	(3,500)
Depreciation	17,161	44,713	27,552	37,450	20,289
Total Operating Expenses	\$ 1,112,837	\$ 1,174,516	\$ 61,679	\$ 884,366	\$ (228,471)
Total Direct Expenses	\$ 4,437,752	\$ 4,508,081	\$ 70,329	\$ 4,516,620	\$ 78,868
Indirect Expenses	\$ 2,656,316	\$ 3,133,342	\$ 477,026	\$ 3,241,444	\$ 585,128
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ 7,094,068	\$ 7,641,423	\$ 547,355	\$ 7,758,064	\$ 663,996
Change in Assets	\$ (125,208)	\$ (797,027)	\$ (671,819)	\$ 4,372	\$ 129,580
Fixed Assets					
Depreciation	(17,161)	(44,713)	(27,552)	(37,450)	(20,289)
Computer & Software CapEx	-	15,726	15,726	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	\$ (108,047)	\$ (62,193)	\$ 45,854	41,822	\$ 149,869
Inc(Dec) in Fixed Assets (C)	\$ (125,208)	\$ (91,180)	\$ 34,028	\$ 4,372	\$ 129,580
TOTAL BUDGET (=B + C)	\$ 6,968,860	\$ 7,550,243	\$ 581,383	\$ 7,762,436	\$ 793,576
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ -	\$ (705,847)	\$ (705,847)	\$ -	\$ -
FTEs	16.50	16.78	0.28	18.75	2.25

Summary of Variances by Category – 2013 Budget Compared to the 2012 Budget

- **Funding from Services and Software** – The decrease in funding from Services and Software, which primarily comes licensing the GADS software to third parties, is due to NERC no longer actively pursuing these revenues.
- **Personnel Expenses** – Salaries and Payroll Taxes will increase in 2013 due to having 2.25 more FTEs on staff than 2012, while Benefits and Retirement Costs are projected to be lower due to changes to NERC’s employee benefit and retirement plans.
- **Meeting, Travel and Conferencing Expenses** – Meetings expense includes costs related to workshops sponsored by the RAPA Program that were previously recorded in the Training Program. The increase in Meetings expense is substantially offset by \$40k in projected Workshop Fees. The increase in Travel expense is related to the additional FTEs budgeted in 2013.
- Contracts and Consultants expense decreased as described above.

Reliability Risk Management

NERC's Reliability Risk Management group carries out the ERO's statutory responsibility to perform assessments (including real-time or near-real-time assessments) of the reliability and adequacy of the bulk power system and, by identifying potential issues of concern relating to system, equipment, entity and human performance that may indicate the possible need to develop new or modified reliability standards. The Reliability Risk Management group includes three primary functions and two departments. The three primary functions include: (1) bulk power system awareness; (2) event analysis ; and (3) assessment of human performance challenges affecting bulk power system reliability and identification of improvement opportunities. The functions and resources of this group are directly focused on proactive awareness of BPS system conditions and all BPE events over a threshold of impact, analyzing events and addressing the most significant risks to BPS reliability and ensuring that industry is well informed of system events, emerging trends, risk analysis, lessons learned and expected actions. These functions may also identify areas in which new or enhanced compliance monitoring and enforcement initiatives, pursuant to the ERO's statutory responsibility to monitor, enforce and achieve compliance with mandatory reliability standards, are warranted.

As noted above, the Reliability Risk Management group consists of two departments; the Situation Awareness Department²⁷ and the Event Analysis ns Department²⁸. In the 2012 budget the Situation Awareness department was consolidated under the Situation Awareness and Critical Infrastructure Security Program Area and the budget for the Event Analysis and Investigations department included the budget for both events analysis and events investigations and was consolidated under the Compliance Enforcement and Organizational Registration Program Area.

The Reliability Risk Management group actively engages with and seeks comments and input from the NERC Standing Committees and industry reliability groups regarding operational alerts, technical lessons learned and the development and follow up of effective solutions and interventions to ensure the management of BPS reliability risk.

²⁷ This department is now called Bulk Power System Awareness. Situation awareness is a function within this group.

²⁸ Since there is only one person presently dedicated to the human performance function, personnel and other costs associated with this function are consolidated with Events Analysis department costs in order to protect the confidentiality of compensation information.

Situation Awareness Department

Situation Awareness (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	8.17	6.50	(1.67)
Direct Expenses	\$ 5,320,471	\$ 4,193,507	\$ (1,126,964)
Indirect Expenses	\$ 1,315,279	\$ 1,123,701	\$ (191,578)
Other Non-Operating Expenses	\$ -	\$ -	\$ -
Inc(Dec) in Fixed Assets	(101,353)	7,103	108,456
TOTAL BUDGET	\$ 6,534,397	\$ 5,324,311	\$ (1,210,086)

Background and Scope

The Situation Awareness department works with registered entities to monitor present conditions on the high voltage transmission lines, associated substations and large generators using various software tools and applications. NERC communicates and coordinates with registered entities to notify them of various types of disturbances (hurricanes, tornados, earthquakes, solar flares from the sun, *etc.*) that could negatively impact their ability to deliver power to homes and businesses. Additionally, when significant BPS disturbances occur, NERC facilitates the coordination of communications between registered entities and applicable governmental authorities.

In 2011, NERC executed a contract for the design, installation and maintenance of the SAFNR V2 platform for the collection and display of key system information from Reliability Coordinators. This platform permits NERC, the Regional Entities, the reliability coordinators and governmental authorities to collect and display key information with common screens and formats. The single approach supports industry by establishing a single data sharing process and protocol as opposed to multiple processes and protocols for NERC, Regions, and governmental authorities thereby eliminating duplication of efforts. During 2012 SAFNR V2 became operational displaying bulk power system data from the 13 Reliability Coordinators from across the three United States interconnections. SAFNR will increase the ERO's awareness of all BPS events above a threshold of impact, ensure reporting and analysis are consistent to allow wide area assessment of trends and risks and ensure Industry is well informed of system events, emerging trends, risks analysis, lessons learned, and expected actions. This platform has not been designed nor is it intended to be used to direct registered entity operations.

The Situation Awareness department also provides funding to support the North American Synchro-Phasor Initiative (NASPI), which was initiated following the August 14, 2003 Northeast blackout. Synchro-Phasors can provide system operators with a critical indication of the health of the bulk power system and help predict weakened areas of the system. In 2010, NERC entered into a contract with the Grid Protection Alliance (GPA) to further advance and support the development and deployment of synchro-phasor technologies. In 2011, NERC and GPA amended their contract to provide that a portion of NERC's funding commitment will be used to

support work GPA was awarded by the Department of Energy (DOE) in December 2010, to develop a secure information exchange gateway for electric grid operations (the “SIEGate Grant”). The primary objective of this project is to develop a secure and flexible “appliance” that will serve as the gateway for all types of real-time data exchanged between a utility control center and other control centers, utilities, and regulatory and oversight entities. In addition to DOE funding, other entities are also providing funding support permitting NERC to further leverage its investment in keeping with NERC’s strategy to promote additional third-party funding and leverage investments where practical. NERC expects to conclude its funding of GPA by the end of 2013.

The Situation Awareness budget also includes funding for a number of reliability tools. The following is a further description of these tools:

- **Interchange Distribution Calculator (IDC)** — Used by reliability coordinators to manage interchange transactions and their curtailment during congestion on the bulk power system. NERC does not use the IDC to conduct its operations. With the support of NERC’s Standards Oversight and Technology Committee, NERC has provided the IDC vendor with written notice that it will not be renewing the IDC contract when it expires on March 31, 2013. The IDC users will assume responsibility for the costs of operating and maintain the IDC, as well as the related SDX and Book of Flow Gates tools described below, upon expiration of NERC’s contract.
- **Resource Adequacy (ACE Frequency) Tool** — provides continuous monitoring of key resource adequacy performance metrics; including pre-established thresholds and limits defined in standards. It alerts Reliability Coordinators and resource subcommittees to critical inadequacies conditions such as major tie error, inaccurate load forecast and inadequate frequency response.
- **Inadvertent Interchange** — facilitates the entering of monthly scheduling data and submittal of monthly inadvertent performance standards reports to NERC. It also assists in the monitoring and resolution of reliability issues originated by inadvertent interchange imbalances.
- **NERC Factor Viewer** — allows transmission customers in the eastern interconnection to view factors related to information congestion.
- **System Data Exchange (SDX)** — central repository of all scheduled and ongoing generator and transformer outages throughout the eastern interconnection. It provides input to the IDC.
- **Book of Flowgates** — a compendium of flowgates in the Eastern Interconnection and input to the IDC. NERC supports this tool by facilitating certain industry working groups and providing funding to support the development and operations of the book of flowgates by Open Access Technologies as part of the IDC contract described further below.
- **AIE Monitoring Tool** — an automatic data collection tool for post analysis of frequency excursions. It is used in major system disturbances as part of the frequency response analysis.

- **Frequency Monitoring and Analysis Tool** — detects frequency events and captures key frequency response information for each interconnection.
- **Intelligent Alarms Tool** — detects short-term and long-term frequency deviations using data transmitted to NERC by the Balancing Authorities. When coupled with the FNet²⁹ and Frequency Monitoring and Analysis tools, this tool allows immediate differentiation of the cause of a frequency deviation – a generator trip or a scheduling error.

2013 Goals and Deliverables

- **Complete Implementation of the SAFNR** — During third and fourth quarters of 2012, NERC expects to complete and put into production the SAFNR V2 application with NERC, FERC, Regional Entities and the reliability coordinators (RCs) as the users. Beginning in early 2013, all users will have information and data to facilitate wide area situation awareness of the bulk power system (230kV and above) in the United States which is expected to:
 - Ensure that the ERO is aware of all BPS events above a threshold of impact
 - Ensure sharing of information and data to facilitate wide area situational awareness
 - Reduce the need for NERC situation awareness staff engagement with RCs and Regional Entities when events occur or when reliability threats are identified
 - During crisis situations, enhance the ERO’s ability to facilitate sharing of information among industry, regions, and government
- **Promote Reliability using new NERC Alert System** - The NERC Alert (Issuance of NERC Advisories, Recommendations and Essential Actions) System being used through December 2012 is a web-based system and, while functional, the system does not meet the needs and requirements of NERC’s Reliability Risk Management (RRM) and Electricity Sector Information Sharing and Analysis (ES-ISAC) staff. The current system does not allow for efficient tracking of reports for actions taken and timely updates on progress towards resolving the issues identified in Recommendations and Essential Actions. In July 2012, NERC issued a Request for Proposal (RFP) to replace the existing NERC Alert system. The new NERC Alert system will increase the reliability of the BPS by:
 - Better informing industry of emerging reliability threats and risks to the BPS, and any expected actions
 - Ensures sharing of information and data to facilitate wide area situational awareness.
 - During crisis situations, enhances the ERO’s ability to facilitate sharing of information among industry, regions, and government

²⁹ **FNet** – Operated by the [Power Information Technology Laboratory](#) at the [University of Tennessee](#), FNET is a low-cost, quickly deployable GPS-synchronized wide-area frequency measurement network. High dynamic accuracy Frequency Disturbance Recorders (FDRs) are used to measure the frequency, phase angle, and voltage of the power system at ordinary 120 V outlets. The measurement data are continuously transmitted via the Internet to the FNET servers hosted at the University of Tennessee and [Virginia Tech](#).

- Enhances tracking capability of reports for actions taken and timely updates on progress towards resolving the issues identified in Recommendations and Essential Actions
- **Monitor NASPI PMUs** - Synchro phasor data, coupled with the Real Time Dynamics Monitoring System (RTDMS) can provide valuable situation awareness information on the status of ongoing disturbances of the bulk power system. The NASPI community is working to advance the deployment and use of networked phasor measurement devices. Working with industry and RTDMS vendors, the department's goal is that
 - Time-synchronized, accurate, detailed data on actual grid events and normal system behavior for event analysis will be available resulting in improvements in situation awareness capabilities
 - The ERO and registered entities will have improved capabilities to analyze the sequence of events, root cause, risk to reliability, and mitigation, including quick dissemination of the frequency response and oscillatory behavior of an event
 - These additional capabilities will further improve the efficiency and effectiveness of information sharing between the ERO, industry and governmental authorities during high impact events
- **Triage of Event Data**- The department will continue to work with the Regional Entities in obtaining and reviewing information from registered entities regarding qualifying events and disturbances as outlined in the ERO Events Analysis Process. These reports are reviewed to verify the accuracy of information, as well as to ensure they include the information necessary for categorizing and cause coding of events. This information will then be used to further improve reliability by advancing:
 - ERO awareness of all BPS events above a threshold of impact
 - Timely dissemination to stakeholders of information regarding events, including aggregate trending and reliability data, as well as lessons learned
 - The accurate verification that reporting and analysis is consistent to allow wide area assessment of trends and risks information
 - Reportable events analysis for sequence of events, root cause, risk to reliability, and mitigation
 - Industry information of system events, emerging trends, risks analysis and lessons learned

Resource Requirements

Personnel

No additional personnel are projected for this group during 2013. The reduction in FTEs is due to the elimination of the chief reliability officer position and support staff which was partially allocated to this department in 2012.

Contractor Expenses

The overall funding of approximately \$2.7M for contractors and consultants to support the Situation Awareness department in 2013 is approximately \$845k below 2012 budget levels, primarily due to the termination of the IDC Contract at the end of March 2013. Approximately \$460k of the \$2.7M budget is for IDC contract costs prior to contract termination and approximately \$300k is for NERC's share of the cost of a secure third-party communications network used to support situation awareness capabilities. The balance of the costs is to support various situation awareness needs, as well as NASPI funding. A detailed breakdown of the 2013 contractor and consulting budget is included in Exhibit B, together with a comparison to 2012 budgeted amounts.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
SITUATION AWARENESS					
	2012 Budget	2012 Projection	Variance 2012 Projection v 2012 Budget Over(Under)	2013 Budget	Variance 2013 Budget v 2012 Budget Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ 6,974,096	\$ 6,974,096	\$ -	\$ 5,093,049	\$ (1,881,047)
Penalty Sanctions	-	-	-	125,288	125,288
Total NERC Funding	\$ 6,974,096	\$ 6,974,096	\$ -	\$ 5,218,337	\$ (1,755,759)
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	10,500	10,500	-	-
Workshops	-	103,175	103,175	105,000	105,000
Interest	3,902	3,902	-	974	(2,928)
Miscellaneous	-	87	87	-	-
Total Funding (A)	\$ 6,977,998	\$ 7,091,760	\$ 113,762	\$ 5,324,311	\$ (1,653,687)
Expenses					
Personnel Expenses					
Salaries	\$ 1,029,015	\$ 747,475	\$ (281,540)	\$ 856,927	\$ (172,088)
Payroll Taxes	68,901	51,029	(17,872)	56,925	(11,977)
Benefits	131,509	124,929	(6,580)	87,659	(43,849)
Retirement Costs	142,882	73,651	(69,231)	98,496	(44,386)
Total Personnel Expenses	\$ 1,372,307	\$ 997,084	\$ (375,223)	\$ 1,100,007	\$ (272,300)
Meeting Expenses					
Meetings	\$ 104,570	\$ 98,700	\$ (5,870)	\$ 198,000	\$ 93,430
Travel	131,000	50,499	(80,501)	72,500	(58,500)
Conference Calls	24,175	3,076	(21,099)	24,175	-
Total Meeting Expenses	\$ 259,745	\$ 152,274	\$ (107,471)	\$ 294,675	\$ 34,930
Operating Expenses					
Consultants & Contracts	\$ 3,588,116	\$ 4,067,872	\$ 479,756	\$ 2,743,180	\$ (844,936)
Office Rent	-	-	-	-	-
Office Costs	50,950	36,346	(14,604)	47,750	(3,200)
Professional Services	-	11,728	11,728	-	-
Miscellaneous	1,500	1,500	-	500	(1,000)
Depreciation	47,853	43,952	(3,901)	7,395	(40,458)
Total Operating Expenses	\$ 3,688,419	\$ 4,161,397	\$ 472,978	\$ 2,798,825	\$ (889,594)
Total Direct Expenses	\$ 5,320,471	\$ 5,310,756	\$ (9,715)	\$ 4,193,507	\$ (1,126,964)
Indirect Expenses	\$ 1,315,279	\$ 1,058,763	\$ (256,516)	\$ 1,123,701	\$ (191,578)
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ 6,635,750	\$ 6,369,519	\$ (266,231)	\$ 5,317,208	\$ (1,318,542)
Change in Assets	\$ 342,248	\$ 722,241	\$ 379,992	\$ 7,103	\$ (335,145)
Fixed Assets					
Depreciation	(47,853)	(43,952)	3,901	(7,395)	40,458
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	\$ (53,500)	\$ (21,015)	32,485	14,498	67,998
Inc(Dec) in Fixed Assets (C)	\$ (101,353)	\$ (64,967)	\$ 36,386	\$ 7,103	\$ 108,456
TOTAL BUDGET (=B + C)	\$ 6,534,397	\$ 6,304,552	\$ (229,845)	\$ 5,324,311	\$ (1,210,086)
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ 443,601	\$ 787,208	\$ 343,606	\$ -	\$ (443,601)
FTEs	8.17	5.67	(2.50)	6.50	(1.67)

Summary of Variances by Category – 2013 Budget Compared to the 2012 Budget

- **Personnel Expenses** – The decrease is due to the 1.67 reduction in FTEs in the department.
- **Meetings Expenses** – This includes the cost of NASPI workshops, which are offset by \$105k in projected Workshop Fees, and the cost of quarterly OC-PC meetings.
- **Contracts and Consultants** – The decrease is due to the termination of the IDC contract as described above.

Event Analysis

Event Analysis (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	13.00	9.50	(3.50)
Direct Expenses	\$ 3,118,744	\$ 2,074,908	\$ (1,043,835)
Indirect Expenses	\$ 2,092,855	\$ 1,642,332	\$ (450,523)
Other Non-Operating Expenses	\$ -	\$ -	\$ -
Inc(Dec) in Fixed Assets	\$ (85,127)	\$ 21,190	\$ 106,317
TOTAL BUDGET	\$ 5,126,472	\$ 3,738,430	\$ (1,388,042)

Background and Scope

The Event Analysis and Investigations Group is critical to supporting the ERO's reliability goals through its work to evaluate bulk power system events, undertaking appropriate levels of analysis to determine the causes of the events, promptly assuring tracking of corrective actions to prevent recurrence, and providing lessons learned to the industry. The Event Analysis and Investigations department is divided between two separately staffed groups: (1) the event analysis group and (2) the event investigation group. The event analysis group is responsible for managing all NERC activities with respect to event analysis, assuring consistent, timely, and coordinated results. The group ensures: (1) reporting and analysis are consistent to allow wide area assessment of trends and risks; (2) all reportable events are analyzed for sequence of events, root cause, risk to reliability and mitigation, and (3) the industry is well informed of system events, emerging trends, risk analysis, lessons learned and expected actions. The event investigation group is responsible for reviewing formal complaints and conducting non-public compliance investigations, as well as assisting in the review of registered entity compliance assessments to verify compliance gaps are assessed in all reportable events. The event investigation group supports NERC's statutory responsibility of reliability standards development and assessing the reliability and adequacy of the bulk power system, as well as the monitoring and enforcing compliance with mandatory reliability standards.³⁰

2013 Goals and Deliverables

³⁰ See NERC Rules of Procedure sections 807-808 and Appendix 8, as well as Section 400 and Appendix 4C.

- Ensuring that all reportable events are analyzed for sequence of events, root cause, risk to reliability, and mitigation.
- Refinement of risk-based methodologies to support more effective and efficient identification of reliability risks, including the use of more sophisticated cause codes for analysis
- Reporting and analysis are consistent to allow wide area assessment of trends and risks
- Tracking industry accountability for critical reliability recommendations
- Ensuring that industry is well informed of system events, emerging trends, risk analysis, lessons learned and expected actions
- Assessing compliance gaps in all reportable events and addressing if appropriate

Resource Requirements

Personnel

One additional position was added in 2012 to support the identification of emerging reliability risks and development of risk control strategies. The remaining decrease in FTEs is the net result of transferring the Human Performance function from another program area, the full year effect of one position added in 2012, but budgeted as 0.5 FTE, and transferring 6.0 FTEs to Compliance Operations.

Contractor Expenses

Consulting and contractor expenses for this department are primarily related to the retention of subject matter experts to assist in the event analysis program, as well as ongoing investigations. Examples of situations which have required the retention of additional outside consulting resources include the September 8, 2011 Southwest Outage event and the February 1-5 2011 Cold Snap event. \$120k is projected for contractors and consultants for 2013 which is consistent with the 2012 budget. To the extent events arise requiring the use of additional experts, funding will be provided from working capital reserves as further described in management's proposed working capital and contingency operating reserve policy and guidelines.

Human Performance Initiatives within the Reliability Risk Management Group

The Reliability Risk Management group's human performance initiatives will be focused on identifying human error risks and those precursory factors that allow human error to impact system reliability and educating industry regarding those risks and precursors and mitigation methods. These initiatives will also support compliance and standards training initiatives, as well as trending and analysis to identify emerging reliability risks to the bulk power system and therefore support NERC's performance of its statutory responsibilities to develop standards for the reliable operation of the bulk power system, monitor and enforce compliance with mandatory reliability standards, and assess the reliability and adequacy of the bulk power system.

The NERC human performance initiative will take place in collaboration with industry human performance projects, such as the Western Electricity Coordinating Council's (WECC's) Human Performance Working Group, the North American Transmission Forum's (NATF's) Human Performance Group and the Electric Power Research Institute.

NERC's Training, Education and Operator Certification Department budget includes training opportunities to increase awareness, knowledge and skills on human performance fundamentals; including web-based training development for ERO staff and/or industry on industry human performance fundamentals. NERC's training efforts will also focus on knowledge and skills development in a number of key areas, including human performance error reduction techniques, which may include workshops, webinars and participation in industry training events.

Resource Requirements

As previously described, NERC's 2013 budget includes resources associated with a human performance function which was established by NERC in 2011. Resources associated with this function are budgeted within the Event Analysis and Investigations department. The workshops are expected to operate close to a breakeven basis.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
EVENT ANALYSIS					
	2012	2012	Variance		Variance
	Budget*	Projection*	2012 Projection	2013	2013 Budget
			v 2012 Budget	Budget	v 2012 Budget
			Over(Under)		Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ 5,073,333	\$ 5,073,333	\$ 0	\$ 3,501,894	\$ (1,571,439)
Penalty Sanctions	-	-		183,113	183,113
Total NERC Funding	\$ 5,073,333	\$ 5,073,333	\$ 0	\$ 3,685,006	\$ (1,388,326)
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	66,000	66,000	52,000	52,000
Interest	2,016	2,410	394	1,423	(593)
Miscellaneous	-	218	218	-	-
Total Funding (A)	\$ 5,075,349	\$ 5,141,961	\$ 66,612	\$ 3,738,430	\$ (1,336,919)
Expenses					
Personnel Expenses					
Salaries	\$ 1,943,198	\$ 2,073,632	\$ 130,434	\$ 1,340,677	\$ (602,520)
Payroll Taxes	125,163	127,894	2,731	82,107	(43,057)
Benefits	212,843	217,755	4,912	125,335	(87,508)
Retirement Costs	278,926	228,459	(50,467)	153,189	(125,737)
Total Personnel Expenses	\$ 2,560,130	\$ 2,647,740	\$ 87,610	\$ 1,701,309	\$ (858,821)
Meeting Expenses					
Meetings	\$ 10,000	\$ 66,584	\$ 56,584	\$ 62,000	\$ 52,000
Travel	395,000	201,058	(193,942)	155,000	(240,000)
Conference Calls	-	16,440	16,440	-	-
Total Meeting Expenses	\$ 405,000	\$ 284,082	\$ (120,918)	\$ 217,000	\$ (188,000)
Operating Expenses					
Consultants & Contracts	\$ 120,000	\$ 150,552	\$ 30,552	\$ 120,000	\$ -
Office Rent	-	-	-	-	-
Office Costs	31,614	47,491	15,877	36,100	4,486
Professional Services	-	438	438	-	-
Miscellaneous	2,000	1,000	(1,000)	500	(1,500)
Depreciation	-	-	-	-	-
Total Operating Expenses	\$ 153,614	\$ 199,481	\$ 45,867	\$ 156,600	\$ 2,986
Total Direct Expenses	\$ 3,118,744	\$ 3,131,303	\$ 12,559	\$ 2,074,908	\$ (1,043,836)
Indirect Expenses	\$ 2,092,855	\$ 2,660,913	\$ 568,058	\$ 1,642,332	\$ (450,523)
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ 5,211,599	\$ 5,792,217	\$ 580,618	\$ 3,717,240	\$ (1,494,359)
Change in Assets	\$ (136,250)	\$ (650,256)	\$ (514,006)	\$ 21,190	\$ 157,440
Fixed Assets					
Depreciation	-	-	-	-	-
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	\$ (85,127)	\$ (52,816)	32,311	21,190	106,317
Inc(Dec) in Fixed Assets (C)	\$ (85,127)	\$ (52,816)	\$ 32,311	\$ 21,190	\$ 106,317
TOTAL BUDGET (=B + C)	\$ 5,126,472	\$ 5,739,401	\$ 612,929	\$ 3,738,430	\$ (1,388,042)
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ (51,123)	\$ (597,440)	\$ (546,317)	\$ -	\$ 51,123
FTEs	13.00	14.25	1.25	9.50	(3.50)

*The 2012 Budget and projected expenses from September to December, 2012 of the Event Investigations Team have not been calculated and are therefore included with the 2012 Budget or 2012 Projection for Event Analysis.

Summary of Variances by Category – 2013 Budget Compared to the 2012 Budget

- **Personnel Expenses** – The decrease is due to the 3.5 decrease in FTEs in the department. Lower average costs per FTE for Benefits and Retirement due to changes to NERC’s employee benefit and retirement plans also reduced projected costs in 2013.
- **Meetings and Travel Expenses** – Meetings expense includes the projected cost of the Human Performance Workshop, which is offset by projected funding from workshop fees. The reduction in budgeted travel expense has been revised downward based on a review of actual and projected 2012 expenses and reflects the decrease in FTEs in the department.

Critical Infrastructure Department

Critical Infrastructure Department (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	17.00	19.25	2.25
Direct Expenses	\$ 5,214,260	\$ 5,089,407	\$ (124,853)
Indirect Expenses	\$ 2,736,810	\$ 3,327,882	\$ 591,072
Other Non-Operating Expenses	-	-	-
Inc(Dec) in Fixed Assets	(111,321)	42,937	154,258
TOTAL BUDGET	\$ 7,839,749	\$ 8,460,227	\$ 620,478

Background and Scope

The Critical Infrastructure Department (CID) supports CIP reliability standards initiatives, the Compliance Operations department's audit oversight function with respect to CIP reliability standards, CIP and cyber information sharing, incident analysis, alerts, system-level risk assessment, and enhanced coordination between industry and our governmental partners.

CID supports several industry-led activities and organizations, including: NERC's Critical Infrastructure Protection Committee, an industry-led committee comprised of industry experts in the areas of cyber security, physical security, and operational security; and the Electricity Sub-sector Coordinating Council, which works closely with Federal Government partners to discuss and identify critical infrastructure protection concepts, processes and resources, as well as to facilitate information sharing about cyber vulnerabilities and threats. For both groups, CID coordinates action items and deliverables the industry members identify and develop. In addition to supporting these industry-led groups, CID representatives participate as members of other industry-led groups, such as the Cross-Sector Cyber Security Working Group, the Industrial Control Systems Joint Working Group, and the Partnership for Infrastructure Security.

The activities of the CID support NERC's ERO statutory responsibilities of reliability standards development, monitoring, enforcing and achieving compliance with CIP standards, and assessing the reliability and adequacy for the bulk power system particularly with respect to cyber security issues, vulnerabilities and threats. Section 1003 of NERC's Commission-approved ROP specifically pertains to the activities of the CID. Section 1003 of the RIP states that "NERC shall coordinate electric industry activities to promote Critical Infrastructure Protection of the Bulk Power System in North America by taking a leadership role in Critical Infrastructure protection of the electricity sector so as to reduce vulnerability and improve mitigation and protection of the electricity sector's Critical Infrastructure," and lists numerous specific functions that NERC shall perform in order to accomplish these goals. Additionally, Appendix 4D of the ROP contains the procedure for requesting and receiving Technical Feasibility

Exceptions to certain CIP reliability standards, which is a process the CID participates in and supports.

2013 Goals and Deliverables

- Support the Standards Program area in CIP standards development to include: continuing engagement with industry on compliance with Version 3; preparing for Version 4 and Version 5 implementation through outreach presentations, webinars, and other training opportunities; and conducting training and outreach to the regional audit staff for audit approaches to both Version 4 and Version 5.
- Support the Compliance Operations department in its oversight of Regional Entity audits to improve the consistency of compliance program results, improve risk-based approaches for auditing and spot checking, and promote a culture of security and compliance through education, transparency, and incentives.
- Continue ES-ISAC capability enhancement and information sharing through portal development and alignment with the broader ISAC community. ES-ISAC functions will include a portal for bi-directional information sharing with government and industry, rapid dissemination of threat and vulnerability information across the industry, a secure repository for security guidelines, incident, threat, and vulnerability information, and an analytical capability to assess potential risks to reliability and develop mitigations for industry consideration.
- Continue to collaborate with government agencies in the United States and Canada to develop more timely dissemination of classified information regarding threats to the bulk power system, including dissemination of information from classified sources in a form that can be provided to and used by the industry.
- Working jointly with Regional Entities, increase the transparency of CIP compliance processes and program results among Regional Entities by deploying shared procedures, training and tools; improve risk-based approaches for CIP auditing to optimize resource utilization; and promote a culture of compliance excellence through education, information, and consistency,
- Conduct security incident analysis and work with industry experts to evaluate, track, and identify lessons learned and security metrics that enhance the sector's security posture,
- Provide support to the Critical Infrastructure Protection Committee (CIPC), CIP Compliance Working Group, Electricity Sub-Sector Coordinating Council (ESCC), and working groups and task forces serving the Standing Committees.
- Apply resources to improve education and outreach related to both CIP standards compliance and general security risk management.
- Host four CIP auditor workshops in 2013 and work jointly with the Compliance Operations department to improve auditor training materials and programs.
- Facilitate) industry and staff training, awareness and security through interactive events such as the annual Grid Security Conference (GridSecCon), the bi-annual Grid Exercise

(GridEx), Cyber Risk Preparedness Assessments (CRPA), and the Sufficiency Review Program (SRP). Successfully support 10 SRPs and activities related to the voluntary White House/DOE Electricity Sub-sector Cybersecurity Maturity Model with the existing CRPA engagement process.

- Provide subject matter expertise and facilitation to Energy Security Public-Private Partnership Group, which is designed to address protected Defense-related mission assurance concerns.
- Provide technical, process facilitation, and critical infrastructure security subject matter expertise to standards development efforts designed to reduce directives, complete a Technical Reference Guide, and deliver CIP Version 5 training and education.
- Support efforts to reduce the NERC/Compliance Enforcement Caseload Index and improve the enforcement case closure rate.
- Offer technical security expertise to assist in system impact characterization and bulk power system risk for significant compliance violations, resulting in better informed bulk power system risk management practice development.
- Foster technical development of risk-based compliance monitoring to maximize reliability benefits and internal controls.
- Contribute technical expertise to establishment of a NERC enterprise-wide cause coding effort designed to inform sector risk-based analytics.

ES-ISAC

Authorities for all ISACs derive from Presidential Decision Directive 63 (PDD-63), which led to establishment of a framework to address critical infrastructure and key resource protection capabilities. ISACs represent a highly focused effort designed to meet these cross-sector information sharing requirements. NERC's activities as the ES-ISAC have been included as statutory activities in all six of NERC's annual business plans and budgets approved to date by the Commission.

The ES-ISAC operates under the requirements and authority set forth in §1003 of the Rules of Procedure which states that NERC shall, among other tasks:

- Serve as the electricity sector's sector coordinator and operate its Information Sharing and Analysis Center to gather information and communicate security-related threats and incidents within the sector, with United States and Canadian government agencies and with other Critical Infrastructure sectors. Improve the capability of the ES-ISAC to analyze security threats and incident information and provide situational assessments for the electricity sector and government.
- Work closely with the United States Department of Homeland Security, Department of Energy, Natural Resources Canada, and Public Safety and Emergency Preparedness Canada.

- Strengthen and expand these functions and working relationships with the electricity sector, other critical Infrastructure industries, governments, and government agencies throughout North America to ensure the protection of the infrastructure of the Bulk Power System.

NERC's activities as the ES-ISAC comprise an important function in assuring the reliability and security of the bulk power system, and they support NERC's ERO statutory responsibilities. In Order No. 672, the Commission stated that the statutory functions of the ERO include "monitoring the reliability of the Bulk-Power System."³¹ By serving as the ES-ISAC, NERC performs a critical role in real-time situation awareness and in protecting the electric industry's critical infrastructure against vulnerabilities. The ES-ISAC information sharing and analytical functions support the reliability of the bulk power system through dissemination of information to the industry regarding threats and vulnerabilities, disturbances, and off-normal occurrences. The information-sharing functions directly move analyses of threats to and impacts on the bulk power system from the ES-ISAC staff to the industry through a variety of means, such as the "Alerts" and "Notification" processes, web portals, webinars, and industry outreach presentations. These activities directly benefit the reliability and security of the bulk power system by educating industry on reliability issues and informing the industry on risks, vulnerabilities and mitigation strategies (as detailed in ROP §1003.1). The ES-ISAC's activities therefore fall squarely within the ERO function identified in Order No. 672 of "monitoring the reliability of the Bulk-Power System."

2013 Resource Requirements

Personnel

CID will have a total of four CIP auditors on staff at the end of 2012. To support projected increases in workload in connection with NERC audit oversight activities, transition to CIP Standards version 4, increased oversight activities, and additional ERO activities the CIP auditors support, CID proposes to add one additional CIP auditor in 2013. This will result in a total of 5 CIP auditors supporting the Compliance Operation Department's and Regional Entity CMEP audit assurance and compliance initiatives. In addition, a CIP Awareness Manager was added in 2012, filling a vacant budgeted position in the department. This position is responsible for developing and leading bulk power system security initiatives, providing program management for security training and exercises, and ongoing program risk assessment activities. The CIP Awareness Manager will also be responsible for conducting security outreach with registered entities. Two Cyber Security Specialist Positions will be added in 2013. Two Cyber Security Specialists will be added to the ES-ISAC team and a 2012 budgeted Cyber Security Specialist will also be added in 2013, one of which will be assigned to the ES-ISAC team. The cyber security specialists will research, analyze, and disseminate information regarding significant cyber and physical security incidents and the specialist assigned to the ES-ISAC will also support access to operations center positions in the Industrial Control Systems Cyber Emergency Response Team and at the DHS National Incident Coordination Center in Washington, DC. These resources are required to stand watch on the National Cybersecurity and Communications Integration Center

³¹ Order No. 672 at P 202.

floor on a rotating schedule. The 2.25 FTE increase in the chart at the beginning of this section is due to projected phasing and timing of hires.

Contractor Expenses

The total projected 2013 CID contractor and consulting budget is \$785k, a decrease of \$10k over the 2012 budget. The following is a description of the major areas of contractor and consulting support. A detailed breakdown of 2013 budgeted costs is set forth in Exhibit B, with a comparison to 2012.

- **ESCC Support** – CID manages the ESCC, which was established under the NIPP framework to foster and facilitate the coordination of sector-wide policy-related activities and initiatives to improve the reliability and resilience of the Electricity Sub-sector, including physical and cyber security infrastructure. (As noted above, ROP section 1003.1.1 specifies that NERC shall serve as the electricity sector’s sector coordinator.) NERC contracted with an industry expert to assist NERC in its support of the ESCC.
- **GridEx 2013 Support** – An exercise designed to validate the readiness of the Electricity Sub-sector to respond to a cyber security incident (CIP-008), strengthen utilities’ crisis response functions, and provide input for internal cyber security program improvements. This bi-annual exercise focuses solely on disruptions and recovery from cyber security incidents (CIP-009) to the Electricity Sub-sector and includes subject matter experts from government and industry. Section 1003.1.7 of the NERC ROP specifies that “NERC shall encourage and participate in coordinated Critical Infrastructure Protection exercises, including interdependencies with other Critical Infrastructure sectors.”
- **2013 ES-ISAC Members Conference** – The ES-ISAC is planning a one-day conference in conjunction with NERC’s 2013 Grid Security Conference. The purpose of this conference is to focus on the operational aspects of the ES-ISAC by sharing with entities the types of information the ES-ISAC receives from data feeds and other security partners, demonstrating tools the ES-ISAC and other security companies use to track and analyze data, and conducting security training on issues, vulnerabilities, and best practices. The Grid Security Conference is within the scope of NERC’s Situation Awareness and Infrastructure Security activities specified in section 1003 of the ROP, including strengthening relationships with federal, state, and provincial governments on CIP matters; working closely with DHS, DOE, Natural Resources Canada and Public Safety and Emergency Preparedness Canada, strengthening and expanding its functions and working relationships with the electricity sector, other Critical Infrastructure industries, governments and government agencies, throughout North America to ensure the protection of the infrastructure of the bulk power system, supporting implementation of the CIP standards through education and outreach, and conducting education and outreach initiatives to increase awareness and respond to the needs of the electricity sector.

- **ES-ISAC – Secure Portal** – The ES-ISAC portal build-out is underway in 2012 and includes a private, members-only portal to disseminate security information to members and to serve as collaboration “zones.” The members’ portal component will be segregated from the compliance and enforcement programs of NERC and include a variety of information sharing mechanisms. The portal build-out will allow for bi-directional information sharing between the ES-ISAC and industry. Initial build-out costs were incurred in 2012 and maintenance costs are required in 2013.
- **ES-ISAC – Secure Connection for Bi-directional Information Sharing** – Some emergent situations allow for quick transmission of secure information between the ES-ISAC and DHS’ United States Computer Emergency Readiness Team. This transmission occurs through formal and stringent technology requirements.
- **Cyber Risk Preparedness Assessment (CRPA)** – The CRPA is a project designed to assess the current cyber resiliency capabilities of bulk power system entities and the adequacy of existing reliability mechanisms related to the unique nature of cyber threats. Through these assessments, the ES-ISAC can target key areas for improvement and share areas of best practices with industry. The CRPA also provides the opportunity to educate participants and, through carefully defined deliverables, share effective practices and impart knowledge to all bulk power system entities. The cost to conduct a CRPA is based on contractor hourly fees, prepared materials, and travel expenses.
- **Attack Tree Threat Modeling** – Attack trees are hierarchical, graphical diagrams that show how low-level hostile activities interact and combine to achieve an adversary's objectives, usually with negative consequences for the attack victim. This tool provides the results needed to justify security choices to company executives and security practitioners. The product is equally applicable to information technology and physical security. The 2013 expenses to maintain this software is \$7,500 and is budgeted under Office Costs, which is where computer supplies and maintenance are reported.
- **Reporting Services – ES-ISAC** This service gives ES-ISAC staff increased understanding of continuing trends, breaking news, and implications to the bulk power system.
- **Aurora Webinars and Reporting** – NERC and the ES-ISAC have been working since 2007 to address the Aurora Vulnerability, a significant supply chain vulnerability that impacts digital protective control devices, which protect generators and motors in use throughout the bulk power system.
- **Analytic Capabilities** – A software service that provides cyber awareness and continuous monitoring, and helps organizations protect against targeted attacks by gathering, correlating, and analyzing threat information from within their own networks, supply chains, and the rest of the Internet. This tool provides real-time internet communications visibility and analytics.
- **Base Line Patterns and Analysis** – A technique where abnormal conditions, such as malicious software from a compromised system communicating to command and control locations that are globally dispersed, are determined by comparing to patterns established during normal conditions. This capability requires specialized tools and analysis to develop.

- **Integration Support Services for Visual Analytical Tools** – ES-ISAC personnel will utilize a visual analytical tool to bring together different representations, or overlays, of data. This capability requires that various data streams are “integrated”, which requires the assistance of specialized consultants.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
CRITICAL INFRASTRUCTURE DEPARTMENT					
	2012 Budget	2012 Projection	Variance 2012 Projection v 2012 Budget Over(Under)	2013 Budget	Variance 2013 Budget v 2012 Budget Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ 7,396,148	\$ 7,396,148	\$ -	\$ 7,991,299	\$ 595,151
Penalty Sanctions	-	-	-	371,044	371,044
Total NERC Funding	\$ 7,396,148	\$ 7,396,148	\$ -	\$ 8,362,343	\$ 966,195
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	95,000	95,000	95,000	95,000
Interest	-	-	-	2,884	2,884
Miscellaneous	-	245	245	-	-
Total Funding (A)	\$ 7,396,148	\$ 7,491,393	\$ 95,245	\$ 8,460,227	\$ 1,064,079
Expenses					
Personnel Expenses					
Salaries	\$ 2,946,168	\$ 2,579,910	\$ (366,258)	\$ 2,853,871	\$ (92,297)
Payroll Taxes	169,764	158,809	(10,955)	172,586	2,822
Benefits	280,269	224,257	(56,012)	250,885	(29,384)
Retirement Costs	409,489	265,266	(144,223)	312,315	(97,174)
Total Personnel Expenses	\$ 3,805,690	\$ 3,228,242	\$ (577,448)	\$ 3,589,657	\$ (216,033)
Meeting Expenses					
Meetings	\$ 104,570	\$ 143,000	\$ 38,430	\$ 145,000	\$ 40,430
Travel	440,000	316,785	(123,215)	420,000	(20,000)
Conference Calls	24,000	32,000	8,000	24,000	-
Total Meeting Expenses	\$ 568,570	\$ 491,785	\$ (76,785)	\$ 589,000	\$ 20,430
Operating Expenses					
Consultants & Contracts	\$ 795,000	\$ 600,270	\$ (194,730)	\$ 785,000	\$ (10,000)
Office Rent	-	-	-	-	-
Office Costs	45,000	104,382	59,382	125,250	80,250
Professional Services	-	468	468	-	-
Miscellaneous	-	302	302	500	500
Depreciation	-	1,042	1,042	-	-
Total Operating Expenses	\$ 840,000	\$ 706,464	\$ (133,536)	\$ 910,750	\$ 70,750
Total Direct Expenses	\$ 5,214,260	\$ 4,426,491	\$ (787,769)	\$ 5,089,407	\$ (124,853)
Indirect Expenses	\$ 2,736,810	\$ 2,993,294	\$ 256,484	\$ 3,327,882	\$ 591,072
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ 7,951,070	\$ 7,419,785	\$ (531,285)	\$ 8,417,290	\$ 466,220
Change in Assets	\$ (554,922)	\$ 71,608	\$ 626,529	\$ 42,937	\$ 597,859
Fixed Assets					
Depreciation	-	(1,042)	(1,042)	-	-
Computer & Software CapEx	-	37,500	37,500	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	\$ (111,321)	\$ (59,413)	51,908	42,937	154,258
Inc(Dec) in Fixed Assets (C)	\$ (111,321)	\$ (22,955)	\$ 88,366	\$ 42,937	\$ 154,258
TOTAL BUDGET (=B + C)	\$ 7,839,749	\$ 7,396,830	\$ (442,919)	\$ 8,460,227	\$ 620,478
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ (443,601)	\$ 94,562	\$ 538,163	\$ -	\$ 443,601
FTEs	17.00	16.03	(0.97)	19.25	2.25

Summary of Variances by Category – 2013 Budget Compared to the 2012 Budget

- **Personnel Expenses** – The decrease in Salaries and Payroll Taxes is due to lower average salaries per FTE in the department. Lower average costs per FTE for Benefits and Retirement due to changes to NERC’s employee benefit and retirement plans resulted in lower projected costs in 2013.
- **Meetings** expense includes the cost of the Grid Security Conference, which is offset by \$95k in projected funding from workshop fees, and quarterly Critical Infrastructure Protection Committee meetings.
- **Office Costs** – Primarily related to increases in cell phone and air card charges due to having more FTEs on staff and related to annual maintenance costs for software used to support activities of the ES-ISAC.

Training, Education, and Operator Certification

Training, Education and Operator Certification (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	6.75	8.00	1.25
Direct Expenses	\$ 2,055,655	\$ 2,170,906	\$ 115,251
Indirect Expenses	\$ 1,086,675	\$ 1,383,016	\$ 296,341
Other Non-Operating Expenses	\$ -	\$ -	\$ -
Inc(Dec) in Fixed Assets	\$ (44,201)	\$ 17,844	\$ 62,045
TOTAL BUDGET	\$ 3,098,130	\$ 3,571,766	\$ 473,637

Background and Scope

NERC's Training and Education Program provides oversight and coordination of the delivery of training programs that support the ERO's statutory responsibilities. This program provides training to NERC and Regional Entity staff members, including compliance auditors, relating to their job responsibilities. It also provides training and education to industry participants on the requirements of reliability standards and the compliance monitoring and enforcement process. Further, this program provides training to industry participants on the reliability standards development process, thereby helping to support the more efficient and effective development of mandatory reliability standards. The Training and Education Program therefore supports the performance of NERC's statutory ERO responsibilities to develop, adopt and obtain approval of reliability standards and to monitor, enforce and achieve compliance with the mandatory standards. Section 901 of the NERC ROP addresses the Training and Education Program's activities in these areas.

NERC's Training and Education Program also supports NERC's System Operator Certification and Continuing Education (SOCCED) programs, which ensure that personnel operating the bulk power system have the skills, training, and qualifications needed to operate the system reliably. NERC maintains the credentials required to work in system control centers across North America for over 6,000 system operators. The requirements of the SOCCED programs are encompassed in Sections 600 and 901 and Appendix 6 of the NERC ROP as well as in Article XII of the NERC Bylaws. NERC's system operator certification exam is designed to test specific knowledge of job skills and reliability standards. It also prepares operators to comply with requirements of reliability standards and appropriately operate the BPS during normal and emergency operations. Certification exams are created by the Personnel Certification Governance Committee, an industry group of operations experts, trainers, and supervisors. Under the PCGC oversight, the Examination Working Group periodically updates and publishes new exams. Once an operator passes the certification exam, certification is maintained by completing NERC-approved continuing education courses and activities. The Personnel

Subcommittee, composed of industry training experts, provides oversight of the Continuing Education program.

2013 Goals and Deliverables

In response to stakeholder and Regional Entity feedback, training and education opportunities will be further expanded and focused for NERC, Regional Entities and registered entities. For registered entities, this training and education will focus on objectives related to various reliability standards including how to best comply with standards and improve bulk power system reliability, as well as cyber related topics. For NERC and Regional Entity staff, the training and education will focus on consistent audit and investigation techniques and standards compliance reviews, including the Compliance Enforcement Initiative/FFT processing and other improvements in compliance and enforcement practices. NERC will continue to offer training in auditor skills to promote continued development of auditing expertise. NERC will leverage information technology systems to better deliver and share common training products and information with regional and registered entities. Other training will focus on knowledge and skills development in a number of key areas, including:

- Critical Infrastructure Protection standards information;
- Development and implementation of clear and technically sound reliability standards;
- Key lessons learned and trends from events;
- Identified themes from trending and common cause analyses;
- Risk-based assessment methods;
- Effective compliance cultures with practices, procedures and controls to address reliability risks;
- Effective root, apparent and common cause analysis methods;
- Quality improvement of registered entity self-reporting and self-certification;
- Currently-monitored standards;
- Entity registration process, issues, and alternatives;
- Human performance fundamentals; and
- Systematic approach to training

NERC will continue to provide learning opportunities through workshops hosted by the Regional Entities. NERC will also host workshops, webinars, and training courses, as well as use vendors to develop training modules and supplement internal training resources, as NERC designs and implements further NERC-hosted electronic training and educational opportunities. NERC's Training and Education group will also continue to advance and improve the skills of NERC's operating staff. NERC's Human Resources department will continue to budget and manage the delivery of more traditional corporate employee training and continuing education programs.

Resource Requirements

Personnel

One (1) position will be added to provide administrative support, the cost of which will be funded through operator certification and testing fees. The 1.25 FTEs in the chart above is the result of reflecting the full year effect of a phasing in of 2012 personnel additions.

Contractor Expenses

The total proposed consulting and contractor expenses of approximately \$850k in 2013 represents an increase of approximately \$252k over 2012 levels. This increase is primarily the result of a multi-year project to continue improvements to the SOCCED database as recommended in the three year assessment. The project will provide improved and efficient interface and ease of use for system operators & supervisors, trainers, training providers, and staff, including automating many features currently done manually and/or individually.

Further detail in support of the proposed 2013 contractor and consulting budget to support Training, Education and Operator Certification is set forth in Exhibit B, including a comparison to 2012 budgeted amounts. The primary areas of contractor and consulting support include:

- Testing services to develop, administer, proctor, score, and support system operator certification exams across North America.
- Ongoing hosting and maintenance fees for the SOCCED database.
- Improvements to the SOCCED database described above.
- Supplemental support to Continuing Education Review Panel industry volunteers to review and audit over 2,500 individual learning activities and provider applications received each year.³²
- Audit team leader soft skills training delivered by certified NERC staff and/or consultants to support effective dialogue and communications between audit teams and registered entities will be provided quarterly using vendor licensed materials.
- Vendor supported BPS technical training for select NERC staff, including auditors, technical and support staff.
- Auditor training by recognized auditing specialists for NERC and Regional Entity staff to promote continued development of compliance staff.
- Web based training development for ERO staff and/or industry, including standards applications, risk assessment training, industry human performance fundamentals, and BPS events lessons learned.

Use of Working Capital Funds for System Operator Certification and Continuing Education Database Upgrades

Under the approved Working Capital and Operating Reserves Policy, that in the event NERC realizes higher levels of funding from operator certification testing and renewal fees above

³² Review and approval of learning activity applications results in over 400,000 hours of continuing education per year for the industry's certified system operators.

incurred expenses, this excess funding will be set aside as an operating reserve and used solely for operator training and certification needs as determined by management and the Personnel Certification Governance Committee. This is consistent with the requirements of Section 602.4.10 of the Rules of Procedure. Expenditures of these funds would be reported as part of NERC's quarterly variance reporting to the Finance and Audit Committee, which reports are also posted on NERC's website and reviewed on conference calls or meetings of the committee which are open to the public. The projected \$250K in 2013 costs for improvements to the System Operator Certification and Continuing Education Database are proposed to be funded through use of excess working capital reserve additions resulting from higher than anticipated revenues from system operator certification and continuing education program fees compared to program costs. This is part of a multiyear project that is estimated to cost approximately \$600k.

As further described in Exhibit C, NERC is projecting a \$1.750M operating reserve balance for the System Operator Certification Program by the end of 2012. Given the size of this projected balance, the Personnel Certification Governance Committee has decided to reduce fees for system operator exams and certificate renewals. The total reduction in the operating reserve balance for the System Operator Certification Program, after taking into account the revised fees and projects funded from reserves, is projected to be \$347.3k.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
TRAINING, EDUCATION and OPERATOR CERTIFICATION					
	2012 Budget	2012 Projection	Variance 2012 Projection v 2012 Budget Over(Under)	2013 Budget	Variance 2013 Budget v 2012 Budget Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ 916,083	\$ 916,083	\$ 1	\$ 1,449,793	\$ 533,711
Penalty Sanctions	-	-		93,484	93,484
Total NERC Funding	\$ 916,083	\$ 916,083	\$ 1	\$ 1,543,277	\$ 627,195
Membership Dues	-	-		-	-
Testing Fees	2,061,000	2,108,200	47,200	1,680,000	(381,000)
Services & Software	-	-		-	-
Workshops	120,000	-	(120,000)	-	(120,000)
Interest	1,047	1,106	59	1,199	152
Miscellaneous	-	100	100	-	-
Total Funding (A)	\$ 3,098,129	\$ 3,025,488	\$ (72,641)	\$ 3,224,476	\$ 126,347
Expenses					
Personnel Expenses					
Salaries	\$ 879,333	\$ 792,205	\$ (87,128)	\$ 837,645	\$ (41,688)
Payroll Taxes	57,024	50,428	(6,596)	54,087	(2,937)
Benefits	108,672	98,814	(9,858)	112,397	3,725
Retirement Costs	119,778	79,193	(40,585)	94,203	(25,575)
Total Personnel Expenses	\$ 1,164,807	\$ 1,020,640	\$ (144,167)	\$ 1,098,332	\$ (66,475)
Meeting Expenses					
Meetings	\$ 124,450	\$ 36,000	\$ (88,450)	\$ 30,000	\$ (94,450)
Travel	48,000	62,306	14,306	70,000	22,000
Conference Calls	58,100	26,914	(31,186)	27,000	(31,100)
Total Meeting Expenses	\$ 230,550	\$ 125,220	\$ (105,330)	\$ 127,000	\$ (103,550)
Operating Expenses					
Consultants & Contracts	\$ 596,448	\$ 810,501	\$ 214,053	\$ 848,574	\$ 252,126
Office Rent	-	-		-	-
Office Costs	63,600	92,791	29,191	96,500	32,900
Professional Services	-	7,500	7,500	-	-
Miscellaneous	250	250		500	250
Depreciation	-	-		-	-
Total Operating Expenses	\$ 660,298	\$ 911,042	\$ 250,744	\$ 945,574	\$ 285,276
Total Direct Expenses	\$ 2,055,655	\$ 2,056,901	\$ 1,246	\$ 2,170,906	\$ 115,251
Indirect Expenses	\$ 1,086,675	\$ 1,221,219	\$ 134,544	\$ 1,383,016	\$ 296,341
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ 3,142,330	\$ 3,278,120	\$ 135,790	\$ 3,553,922	\$ 411,592
Change in Assets	\$ (44,201)	\$ (252,632)	\$ (208,431)	\$ (329,446)	\$ (285,245)
Fixed Assets					
Depreciation	-	-		-	-
Computer & Software CapEx	-	-		-	-
Furniture & Fixtures CapEx	-	-		-	-
Equipment CapEx	-	-		-	-
Leasehold Improvements	-	-		-	-
Allocation of Fixed Assets	\$ (44,201)	\$ (24,240)	19,961	17,844	62,045
Inc(Dec) in Fixed Assets (C)	\$ (44,201)	\$ (24,240)	\$ 19,961	\$ 17,844	\$ 62,045
TOTAL BUDGET (=B + C)	\$ 3,098,129	\$ 3,253,881	\$ 155,752	\$ 3,571,766	\$ 473,637
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ -	\$ (228,392)	\$ (228,392)	\$ (347,290)	\$ (347,290)
FTEs	6.75	6.54	(0.21)	8.00	1.25

Summary of Variances by Category – 2013 Budget Compared to the 2012 Budget

- **Testing Fees** – The decrease is due to a reduction in fees for system operator tests and certificate renewals, as described above.
- **Meetings Expense** – In 2012, all NERC-sponsored workshops and the projected funding from workshop fees were budgeted in the Training Department. In 2013, the projected funding from workshop fees and workshop expenses are recorded in the Program sponsoring the workshop.
- **Contracts and Consultants** – The increase is for the upgrade of the SOCCED database as described above.

Administrative Services

Administrative Services (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	47.75	52.75	5.00
Total Direct Expenses	\$ 20,767,559	\$ 23,079,081	\$ 2,311,523
Inc(Dec) in Fixed Assets	\$ (844,731)	\$ 297,774	\$ 1,142,505
Less: Other Funding Sources			\$ -
Total Allocation to Statutory Programs as Indirect Expenses	\$ 19,922,828	\$ 23,376,855	\$ 3,454,028
Funding Requirement for Working Capital	\$ (0)	\$ (1,686,309)	\$ (1,686,309)

Program Scope and Functional Description

NERC's Administrative Services area includes the budget for all business and administrative functions of the organization, including (1) technical committees and member forums, (2) General and Administrative, which includes Board of Trustees fees and expenses, the president and chief executive officer and support staff, communications and governmental affairs, and office rent (3) Legal and Regulatory, (4) Human Resources, (5) Information Technology, (6) Finance and Accounting, and general administrative expenses necessary to support program area activities. These functions are necessary to the existence and functioning of the organization and support the performance of NERC's ERO statutory activities. The costs of the Administrative Services functions are allocated to the five statutory programs. The resource requirements and comparative budget information for each of these functions is described further below. Costs incurred for these services are allocated as an indirect expense across NERC's other program areas.

Technical Committees and Members' Forum Program

While NERC management and staff will continue to interact with and support numerous reliability related forums, including but not limited to the North American Transmission Forum and Generator Forum, NERC's 2013 budget does not contain specific funding for any additional forum activities.

General and Administrative

General and Administrative (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	7.00	8.00	1.00
Total Direct Expenses	\$ 6,800,249	\$ 7,325,556	\$ 525,307
Inc(Dec) in Fixed Assets	\$ (255,775)	\$ (350,526)	\$ (94,751)
Working Capital Requirement	\$ -	\$ (1,686,309)	\$ (1,686,309)

Background and Scope

The General and Administrative area is responsible for the administration and general management of the organization. Expenses allocated in this area include office rent, personnel and related costs of the CEO, a senior advisor to the CEO, the CEO's executive assistant, communications and public relations staff, and costs related to the Board of Trustees.

The following table details the Board of Trustees costs included in the total costs of the General and Administrative area. The increase in the 2013 budget for quarterly Board of Trustee Meetings is based on a slight increase in 2012 costs compared to budget which was not known at the time the 2012 Projection was developed. The 2012 Projection and 2013 Budget for Trustee Travel are based upon 2011 actual results and the 2012 YTD trend, both of which reflect increased Board of Trustee attendance as observers at Regional Entity board meetings, as well as participation in key stakeholder meetings. Travel expense includes the cost of travel, lodging and meals, consistent with employee travel expenses. The 2012 budget and projection for trustee search fees is for two new trustees to be appointed in 2013. Actual search fees in excess of budget are expected to be funded in 2012 from operating reserves and will be included in future variance reports.

Board of Trustee Expenses	Budget 2012	Projection 2012	Budget 2013	2013 v 2012 Budget	Variance %
Meetings and Travel Expenses					
Quarterly Board Meetings	\$ 224,000	\$ 224,000	\$ 234,000	\$ 10,000	4.46%
Trustee Travel	110,000	155,000	155,000	45,000	40.91%
Total Board of Trustees Meetings and Travel Expenses	334,000	379,000	389,000	55,000	16.47%
Professional Services					
Independent Trustee Fees	980,000	980,000	980,000	-	0.00%
Trustee Search Fees	75,000	75,000	-	(75,000)	-100.00%
Total Board of Trustee Professional Services Expenses	1,055,000	1,055,000	980,000	(75,000)	-7.11%
Total Board of Trustee Expenses	\$ 1,389,000	\$ 1,434,000	\$ 1,369,000	\$ (20,000)	-1.44%

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
GENERAL and ADMINISTRATIVE					
	2012 Budget	2012 Projection	Variance 2012 Projection v 2012 Budget Over(Under)	2013 Budget	Variance 2013 Budget v 2012 Budget Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ -	\$ -	\$ -	\$ (1,686,309)	\$ (1,686,309)
Penalty Sanctions	-	-	-	-	-
Total NERC Funding	\$ -	\$ -	\$ -	\$ (1,686,309)	\$ (1,686,309)
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Total Funding (A)	\$ -	\$ -	\$ -	\$ (1,686,309)	\$ (1,686,309)
Expenses					
Personnel Expenses					
Salaries	\$ 1,561,193	\$ 1,793,637	\$ 232,445	\$ 1,342,080	\$ (219,113)
Payroll Taxes	67,331	77,007	9,676	60,640	(6,691)
Benefits	208,278	190,443	(17,835)	156,238	(52,040)
Retirement Costs	236,295	92,019	(144,276)	175,179	(61,116)
Total Personnel Expenses	\$ 2,073,097	\$ 2,153,106	\$ 80,010	\$ 1,734,136	\$ (338,960)
Meeting Expenses					
Meetings	\$ 224,000	\$ 224,600	\$ 600	\$ 260,000	\$ 36,000
Travel	265,120	321,651	56,531	322,000	56,880
Conference Calls	57,500	50,292	(7,208)	57,500	-
Total Meeting Expenses	\$ 546,620	\$ 596,543	\$ 49,923	\$ 639,500	\$ 92,880
Operating Expenses					
Consultants & Contracts	\$ -	\$ -	\$ -	\$ 150,000	\$ 150,000
Office Rent	2,304,257	2,784,036	479,779	2,756,840	452,583
Office Costs	480,500	456,983	(23,517)	507,000	26,500
Professional Services	1,130,000	1,265,096	135,096	1,132,053	2,053
Miscellaneous	10,000	10,050	50	5,500	(4,500)
Depreciation	255,775	378,783	123,008	350,526	94,751
Total Operating Expenses	\$ 4,180,532	\$ 4,894,947	\$ 714,415	\$ 4,901,919	\$ 721,387
Total Direct Expenses	\$ 6,800,249	\$ 7,644,597	\$ 844,348	\$ 7,275,556	\$ 475,307
Indirect Expenses	\$ (6,800,249)	\$ (7,705,597)	\$ (905,348)	\$ (7,325,556)	\$ (525,307)
Other Non-Operating Expenses	\$ -	\$ 61,000	\$ 61,000	\$ 50,000	\$ 50,000
Total Expenses (B)	\$ -	\$ -	\$ 0	\$ -	\$ 0
Change in Assets	\$ -	\$ -	\$ (0)	\$ (1,686,309)	\$ (1,686,309)
Fixed Assets					
Depreciation	(255,775)	(378,783)	(123,008)	(350,526)	(94,751)
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	212	212	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	112,299	112,299	-	-
Allocation of Fixed Assets	\$ 255,775	\$ 266,272	10,497	350,526	94,751
Inc(Dec) in Fixed Assets (C)	\$ -	\$ -	\$ 0	\$ -	\$ -
TOTAL BUDGET (=B + C)	\$ -	\$ -	\$ 0	\$ -	\$ 0
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ -	\$ -	\$ (0)	\$ (1,686,309)	\$ (1,686,309)
FTEs	7.00	9.40	2.40	8.00	1.00

Summary of Variances by Category – 2013 Budget Compared to the 2012 Budget

- **Personnel Expenses** – The average cost of all personnel expense categories is lower in 2013 as previously explained.
- **Meetings** – This includes the cost of quarterly Board of Trustee and Member Representatives Committee meetings, ERO executive staff meetings, and employee meetings.
- **Consultants and Contracts** – The budget to support external affairs was moved from the Legal and Regulatory Program to Government Relations which is part of the General and Administrative Program. The legal department formerly provided oversight of these activities prior to the company hiring a senior external affairs professional.
- **Rent** – The increased rent expense reflects the amortization of the lease costs for NERC office space over the term of the leases and the estimated cost of increasing leased space in Atlanta.
- **Miscellaneous Expenses** – The 2012 budget included \$10k for employee rewards and recognition expenses, which has been budgeted in Human Resources in 2013. This budget is intended to cover the token gifts to retiring employees, condolence flowers a death in the family, and similar types of expenses. \$5k of the 2013 Budget for Miscellaneous Expenses included in this Program is for a new initiative of Community Responsibility and Employee Engagement. These funds would be used to purchase items like tee shirts and/or box lunches for employees volunteering to support local community charitable activities in Atlanta and Washington, D.C. A new account has been added to the System of Accounts to track expenses of this initiative. (Refer to Table B-9 on page 119). A budget is not being presented for, nor does the company expect to incur, expenses for employee entertainment.

Legal and Regulatory

Legal and Regulatory (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	13.00	14.00	1.00
Total Direct Expenses	\$ 4,021,294	\$ 4,045,729	\$ 24,435
Inc(Dec) in Fixed Assets	\$ -	\$ -	\$ -
Working Capital Requirement	\$ -	\$ -	\$ -

Background and Scope

The Legal and Regulatory department provides legal and regulatory support to the organization. This department's workload is largely derivative of and supports the work of several of the NERC's key program areas. Increasing demands are being placed on this group from three

primary areas: compliance operations, investigations, and standards. In the compliance operations area, there are increased requests for legal support for significant audits. In the investigations area, there are increasing calls for legal support for investigation teams. In standards, there are increasing calls for legal participation with drafting teams, drafting assistance and quality review of standards projects. In addition, recent FERC orders indicate a need for increased resources devoted to the development of filings for approval of standards.

In addition, this department is also responsible for providing a wide range of legal support to the NERC management team regarding antitrust, corporate, commercial, insurance, contract, employment, real estate, copyright, tax, legislation and other legal matters, the needs for which are growing as the NERC and the ERO mature and legal support needs become broader and more complex.

Resource Requirements

One FTE was transferred to Legal and Regulatory in 2012 to provide administrative support for the Washington, DC office. No additional staff is proposed to be added to the legal and regulatory areas in 2013.

Outside law firms and consultants supporting this area are budgeted and tracked as Professional Services. The 2013 Professional Services budget is \$950K for 2013, an increase of \$200K over the 2012 budget, of which \$150k is to support the next ERO Performance Assessment.

**Statement of Activities, Fixed Assets Expenditures and Change in Working Capital
2012 Budget & Projection, and 2013 Budget**

LEGAL and REGULATORY

	2012 Budget	2012 Projection	Variance	2013 Budget	Variance
			2012 Projection v 2012 Budget Over(Under)		2013 Budget v 2012 Budget Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ -	\$ -	\$ -	\$ -	\$ -
Penalty Sanctions		\$ -		-	
Total NERC Funding	\$ -	\$ -	\$ -	\$ -	\$ -
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Total Funding (A)	\$ -	\$ -	\$ -	\$ -	\$ -
Expenses					
Personnel Expenses					
Salaries	\$ 2,317,740	\$ 2,266,547	\$ (51,193)	\$ 2,325,293	\$ 7,553
Payroll Taxes	118,966	116,701	(2,265)	119,177	211
Benefits	249,428	167,961	(81,467)	185,835	(63,593)
Retirement Costs	327,545	243,161	(84,384)	261,724	(65,821)
Total Personnel Expenses	\$ 3,013,679	\$ 2,794,370	\$ (219,309)	\$ 2,892,029	\$ (121,650)
Meeting Expenses					
Meetings	\$ 5,000	\$ 5,000	\$ -	\$ 5,000	\$ -
Travel	74,000	113,463	39,463	144,500	70,500
Conference Calls	3,200	1,500	(1,700)	3,200	-
Total Meeting Expenses	\$ 82,200	\$ 119,963	\$ 37,763	\$ 152,700	\$ 70,500
Operating Expenses					
Consultants & Contracts	\$ 141,750	\$ 141,750	\$ -	\$ -	\$ (141,750)
Office Rent	-	-	-	-	-
Office Costs	32,915	55,959	23,044	50,500	17,585
Professional Services	750,000	1,350,000	600,000	950,000	200,000
Miscellaneous	750	750	-	500	(250)
Depreciation	-	-	-	-	-
Total Operating Expenses	\$ 925,415	\$ 1,548,459	\$ 623,044	\$ 1,001,000	\$ 75,585
Total Direct Expenses	\$ 4,021,294	\$ 4,462,792	\$ 441,498	\$ 4,045,729	\$ 24,435
Indirect Expenses	\$ (4,021,294)	\$ (4,462,792)	\$ (441,498)	\$ (4,045,729)	\$ (24,435)
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ -	\$ -	\$ 0	\$ -	\$ (0)
Change in Assets	\$ -	\$ -	\$ (0)	\$ -	\$ 0
Fixed Assets					
Depreciation	-	-	-	-	-
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets		\$ -		-	
Inc(Dec) in Fixed Assets (C)	\$ -	\$ -	\$ -	\$ -	\$ -
TOTAL BUDGET (=B + C)	\$ -	\$ -	\$ 0	\$ -	\$ (0)
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ -	\$ -	\$ (0)	\$ -	\$ 0
FTEs	13.00	12.39	(0.61)	14.00	1.00

Summary of Variances by Category – 2013 Budget Compared to the 2012 Budget

- **Personnel Expense** – As previously described, the decrease is due to lower average costs per FTE and changes to NERC’s employee benefits and retirement plans.
- **Travel** – Legal staff travel will increase due to increased participation in standards drafting team meetings and ERO legal working group meetings.
- **Consultants and Contracts** – The budget for support of external affairs was moved from Legal and Regulatory to the General and Administrative Program.
- **Professional Services** – This is \$200K over the 2012 budget and \$150k of which is included in the 2013 Budget to support the next ERO performance assessment.

Information Technology

Information Technology (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	12.75	16.75	4.00
Total Direct Expenses	\$ 6,629,579	\$ 7,978,705	\$ 1,349,126
Inc(Dec) in Fixed Assets	\$ (588,185)	\$ 649,098	\$ 1,237,283
Working Capital Requirement	\$ (0)	\$ -	\$ 0

Background and Scope

NERC’s Information Technology Department is responsible for planning, designing, implementing and operating technology in support of the ERO’s goals and objectives. An important IT initiative in 2013 involves the implementation of a centralized data repository with the necessary infrastructure to accept inbound data and catalog this data in one location for access across the ERO. The data repository will provide the necessary visibility to information required by NERC and the Regional Entities in order to gain better data intelligence and collaboration and effectively and efficiently perform key functions.

The ERO has many methods by which to obtain data required to ensure the reliability of the bulk electric system. However there presently is no one single location in which to capture and mine data across the ERO to give broad spectrum visibility across multiple disciplines: standards, compliance operations, enforcement, critical infrastructure protection, event analysis, reliability risk assessment and management. Implementation of a single data repository designed to capture information across disciplines within the ERO sets the stage for improved reporting, data consistency, improved efficiency and adherence to regulatory requirements. The next phase of implementation will leverage tools such as Microsoft SharePoint 2010 in addition to other business intelligence tools to create applications for both NERC and the Regional Entities for a single, holistic look at data across the ERO. The resulting single repository of data will be more efficient across NERC and the Regional Entities, coupled

with lower resource utilization required in support of the current multi-database, multi-application infrastructure.

NERC's 2013 IT budget sets the framework to commence implementation of a single data repository. The proposed contract, consulting, operations and maintenance budget amounts are tailored to ensure the building blocks are in place to support this and other strategic ERO initiatives and applications started in 2012.

Utilizing recommendations from the Deloitte and Touche "IT Architecture" study conducted in Q4/ 2011, NERC embarked upon an aggressive strategy to design and implement a development strategy following industry best practice for application development. Implementation of a development, QA and production environment sets the stage, in collaboration with the Regional Entities and PMO to create consistent applications deemed strategic to the ERO. A survey of NERC and the Regional Entities identified 95 applications either in use, or items requested in support of ERO functions. In order to reduce the backlog of those applications deemed strategic to the ERO, it will require a concentrated effort by NERC, the Regional Entities and contract and consultant resources working in concert to conduct in-depth business analysis of requirements, development of request for proposal and consideration of in-house development, or outsourced development by contract and consultant resources, as applicable. Several of the applications identified during the survey are substantial in nature and will require a multi-year approach to define, develop and implement throughout the ERO. As applications are defined, additional development, QA and production hardware will be required to enhance the virtual environment.

2013 Goals and Deliverables

- (Multi-year effort) With the Regional Entities and external consulting support, deploy a common, enterprise-wide technology platform that embraces the requirements of Regional Entities and stakeholders for reliable, secure, efficient, and cost-effective systems and services.
- (Multi-year effort) design a data warehouse capability - single repository of data designed to provide a reliable, stable, secure environment for reporting across multiple disciplines e.g., RAPA, Compliance, Standards, Enforcement, etc.
- Implement disaster recovery of critical IT resources (e.g., Exchange (email), NERC forward facing web-site, MS SQL, etc.)
- Laptop backup application – back up files and folders on the desktop, or in folders other than the "my documents" folder
- Implement Phase II NERC public web-site upgrade. Multi-lingual support, Business Intelligence capabilities, mobile support, enhanced user management, etc.
- (Multi-year effort) Reduce backlog of 95+ NERC and ERO projects currently identified as business needs to the Project Management Office.
- Re-write ERO Membership Service Agreement application, which is a specialized version of the NERC My Account described below. The ERO Membership Service Agreement

application captures additional information that may not be required by the NERC My Account Service.

- Re-write NERC My Account Service Agreement application, which is a single user account that, when granted rights, allows the user to request access to multiple secured NERC sites. The registration process collects the required information from the requestor to allow the NERC resource to vet the request and determine if the requestor should be granted access to the requested secure site.
- Re-write User Management Program (UMP) Service Agreement application. UMP provides external persons who need or desire access to NERC tools a way to request approved access. The UMP application is archaic in its approach to delivery of user access and rewriting the application using SharePoint 2010 will greatly reduce NERC employee manual input.

Resource Requirements

To accomplish the goals and objectives described above, additional resources will be required as further described below.

Personnel

In 2012, three positions which were previously under the chief reliability officer and allocated among several Program areas were transferred to the Information Technology department when the chief reliability officer position was eliminated. The reason for this transfer was based on an independent consultant's recommendation as part of a corporate process improvement initiative to create a Project Management Office (PMO) within the Information Technology department. The PMO is responsible for managing the identification, prioritization, design and deployment of IT applications supporting various departmental business needs, as well as supporting the common IT business needs of NERC and the Regional Entities. The individuals who were transferred were each involved in the management of IT applications supporting various program areas, including compliance database and standards balloting redesign, as well as process improvement and enterprise architecture redesign initiatives. Only one additional Information Technology resource will be added in 2013, a SharePoint Administrator/Developer with responsibility for developing business applications in SharePoint 2010 and Visual Studio 2010. The role will be a dual capacity function and will need to possess strong SharePoint administration background along with experience developing and maintaining Enterprise class applications in a SharePoint environment. The role will be instrumental in replacing several internal NERC applications to increase efficiency and productivity. The role will also be leveraged to ensure ERO Enterprise class applications are designed consistent with SharePoint best practices.

In addition to the one (1) resource being added in 2013, the existing compliment of Information Technology resources are optimized following industry best practice for service support:

- Information Technology Support Center (ITSC) provides reactive support for help desk assistance for all NERC employees and requests as received from entities for access to NERC resources.

- System and Network Administration senior level resources are responsible for proactive support and strategic implementation of system, network and security across the enterprise.
- Development senior level resources are responsible for designing and creating applications across NERC and the ERO to increase collaboration, reduce duplication of effort and improve data intelligence capabilities.
- Project Management junior and senior level resources are responsible for gathering business requirements and translating into technology scope for creation by development or outsourcing as appropriate.

Contractor Expenses

The following is a list of the 2013 budgeted contractor and consulting expenditures, the cost of which are set forth in Exhibit B. The overall 2013 budget for contractors and consultants represents a \$1,303,000 increase over the 2012 budget.

- **NERC Website Design** – Major initiative to complete redesign and rewrite of the NERC public website using SharePoint 2010. The effort will entail usage of multiple contract resources with knowledge of SharePoint governance rules for document management; to include metadata tagging, quality assurance and exposure to the public facing website.
- Re-write ERO Membership Service Agreement application, which is a specialized version of the NERC My Account described below. The ERO Membership Service Agreement application captures additional information that may not be required by the NERC My Account Service.
- Re-write NERC My Account Service Agreement application, which is a single user account that, when granted rights, allows the user to request access to multiple secured NERC sites. The registration process collects the required information from the requestor to allow the NERC resource to vet the request and determine if the requestor should be granted access to the requested secure site.
- Re-write User Management Program (UMP) Service Agreement application. UMP provides external persons who need or desire access to NERC tools a way to request approved access. The UMP application is archaic in its approach to delivery of user access and rewriting the application using SharePoint 2010 will greatly reduce NERC employee manual input.
- **Security Vulnerability Testing** – Ongoing intrusion detection and vulnerability testing of the NERC public website, NERC network and systems. Testing is conducted by an outside vendor using the latest intrusion techniques to test the security of the NERC network. Multiple attempts are made to gain access and any vulnerabilities identified are documented and provided to NERC Information Technology for rapid remediation.
- **Infrastructure Design and Integration** – Hardware and software required to support development and ongoing NERC production activities. Multiple infrastructure items are targeted in the 2013 budget to include: server and laptop replacement, remote access,

improved storage capability, Local and wide-area network monitoring and alerting, virtualization and consolidation.

- **Compliance Database** – Redesign of the compliance database modules: Standards, Registration and Technical Feasibility Exception (TFE) using SharePoint 2010.
- **Standards Balloting** – Complete re-write of the Standards Balloting application using SharePoint 2010. The initial re-write and redesign of the application will be completed in 2012, but additional capability will be built into the application in 2013 for greater ease of commenting and response capability for Registered Entities.
- Project management, application development, support and maintenance (listed as Contractor Project Manager, Contractor Business Analyst and Contractor programming and development support on Exhibit B).
- Project management tools designed to track and monitor project, resource and budget adherence across NERC. The tool would also be used by the Standards team as a replacement for the existing tool which lacks core capability and functionality to track activities.
- **Quality Assurance Testing** – Quality Assurance (QA) for applications created by development or by outside contractors. The tool would allow for writing of QA scripts in plain English to test user screens for full functionality versus manual QA of the application. QA tools would greatly decrease coding errors and increase user satisfaction with the final product.
- **Data Warehouse Design** – A data warehouse is commonly used as a consolidated location for massive volumes of data. In this context a data warehouse would be created leveraging best of class hardware and consulting services to stream data into a consolidated database accessible across the ERO. The data warehouse would be constructed in such a manner to build upon efforts started in 2012 to consolidate the multiple databases and streams of information into a consolidated warehouse allowing for the creation of applications and mining of data in a centralized repository for increased data sharing across a broad spectrum of disciplines *e.g.*, RAPA, Compliance, Standards, etc.
- **Common Technology Platform** – Through collaboration and information sharing among NERC and the Regional Entities a concentrated effort would be initiated to choose a best of class application designed to provide a secure, easy to use ERO application.
- **Studies and Assessments** – Vendor studies and assessments that would be required in the event an application or database could not be delivered by NERC in-house development due to resource or time constraints. Studies and assessments are required in many instances to map out existing applications to the associated database and to gather technology requirements in order to scope the best technical solution for the business need.
- **Disaster Recovery** – Hardware and applications required to set up an initial disaster recovery site as a backup option in the event the NERC primary data center is unavailable. Primary business tools such as critical grid alerting tools, Microsoft

Exchange, remote telephony and other tools designed to ensure the continued operation of NERC business entities would be part of the initial design.

- **Backup of Electronic Files** – Purchase of greatly improved backup and recovery software designed to backup Microsoft Exchange, Laptop and Server data to meet retention and storage requirements.

2013 IT Operating and Capital Expense Budget

As indicated above, 2013 IT planning was based on a multi-year strategy designed to reduce complexity, improve productivity and gain a consolidated view of data across the ERO. Several criteria were considered during the planning phase to include a NERC IT Architecture study conducted by Deloitte and Touche in the fourth quarter of 2011, the need for visibility to aggregate data across the ERO and vastly improved collaboration among NERC and the Regional Entities.

The NERC IT Architecture study determined that many of the ERO applications designed in prior years were shown to be in silos and unable to look across multiple disciplines in order to obtain an aggregate view of events or trending across the grid. Implementation of enterprise-class tools such as SharePoint, SQL Server 2008, Virtualization and centralized data warehouse capability was deemed critical to provide greater productivity and efficiency, enhanced visibility to data and vastly improved collaboration.

In addition to setting the stage for implementation of core technologies in 2013, IT initiatives in 2012 were built using industry-standard best practices designed to build upon many of the recommendations of the Deloitte and Touche IT Architecture study. Tools such as SharePoint 2010, workflow automation – K2 Black Pearl in addition to best practices for centralized management and methodology through the Project Management Office, along with development, Quality Assurance and Production build the framework for 2013 operating and capital budget request described in greater detail below.

The 2013 IT operating and capital budget builds on industry best-practices and are focused on greater visibility, accountability and reliability of data across multiple disciplines.

2013 IT Operating Expenses

A summary of the major categories of IT Operating Expenses are set forth in the following table followed by a discussion.

Office Costs	Budget 2013
Telephone	\$ 175,000
Internet	335,000
Computer Supplies and Maintenance	
Computers	3,000
Computer Supplies	116,900
Maintenance & Service Agreements	1,226,325
Software	37,500
Total Office Costs	\$ 1,893,725

Telephone Expenses

Office telephone costs are items associated with cellular phone, mobile laptop cellular air card, bonded T1 Voice over Internet Protocol (VoIP) data circuits and conference calling expenses.

- NERC-issued cell phones are provided to employees to ensure access and productivity before, during and after business hours and cost is minimized by leveraging pooled minutes. Individual NERC employees are provided with a basic pooled cell phone plan of 450 minutes including a basic-level subscription for texting and data. This plan is designed to ensure persons who travel frequently have additional cell phone minutes, by taking advantage of limited usage by employees who travel less frequently. In addition, employees are encouraged to connect via wireless whenever possible to reduce cellular charges for data usage. The basic texting plan is provided for those instances when calling or email is not optimal. Cellular calling costs are included in the telephone expense item.
- Mobile laptop cellular air cards are provided to ensure connectivity while traveling or in locations where wireless connectivity is unavailable. Employees are encouraged whenever possible to connect via wireless versus cellular to reduce usage fees. Wireless or cellular connectivity to the NERC network is enabled using virtual private network technology to ensure maximum security, logging and encryption.
- Information Technology support persons are required to be available for support 24x7x365 that in almost all instances requires access to systems and network via secure internet connectivity. Included in the line item “telephone” are those monthly costs associated with internet access for systems, application, network and security to enable IT resources to provide support, conduct emergency and non-emergency patching of systems, routers, firewalls, etc., as required to ensure the stability of the NERC technology environment.
- Conference calling is conducted via an external service provider in order to minimize internal hardware, Information Technology support, and internal conference lines capable of providing access to an external audience. Information Technology conference calling, webinars, recorded events, etc., are included in the telephone cost line item.
- Bonded T1 circuits provide access for VoIP service for NERC desk phones in lieu of having a very expensive, support intensive in-house phone switch (e.g., Private Branch

Exchange) that requires senior-level telecommunication resources to support and manage.

Internet Expense

Internet expense is comprised of data circuits, Plain old Telephone Service (POTS), and redundant capability in the event of primary service provider failure. Individual detail is outlined below:

- **Atlanta Headquarters (HQ)** – The Atlanta HQ office is connected to Washington, DC and the offsite co-location data center via direct (metro-E) data circuits and via backup internet and secondary carrier. In the event of a primary circuit failure, the HQ location automatically fails over to a secondary circuit in order to access over one hundred (100) servers, network devices, intrusion protection and detection, firewall, routers and switches located at the co-location data center. Co-location was chosen to minimize cost associated with adding, maintaining, cooling, fire protection, etc., of a NERC-owned data center. NERC employees must have connectivity (via primary and secondary) to the co-location facility in order to access all industry, back-office and office productivity applications. Internet connectivity, in addition to providing limited access in the event of primary and secondary carrier failure is used to ensure access by remote users e.g., VPN connected laptops, etc., in order to access NERC computer resources.
- **Washington, DC (DC)** – The DC office has similar connectivity back to the co-location data center located in Atlanta, Georgia. The DC office connectivity is primarily via high speed remote private circuit with backup connectivity to the Atlanta HQ location in the event of a primary circuit failure. The DC office also has internet access in a similar fashion to the HQ location.
- NERCNet Data circuits between the Carteret, New Jersey data center and the Atlanta co-location facility are included in the internet expense line item to ensure primary and secondary connectivity for NERCNet nodes.
- POTS Lines and bonded T1 data service are leveraged to provide access for conference calling and for internal desk phones. POTS lines have been installed in each conference room to be used for conference calling to ensure maximum voice quality due to the magnitude of calls conducted, number of external audio and video members and reliability.

Computers

Computers are items that do not meet the criteria considered a capital expense such as desktop computers or iPads. Desktop computers enable conference webinars, internet access, training room functionality, etc., for those instances when a presenter does not have a computer device available to conduct presentations. In addition, NERC will on a case-by-case basis and as justified by extensive travel or consistent out of office meetings provide an iPad with cellular data access for persons who require functionality but are unable to use a laptop for computing needs.

Computer Supplies

Computer supplies are expense items required for infrastructure support to include computer monitors, mice, keyboard, cell phones, cables, encrypted hard drives, encrypted thumb drives, encryption keys, uninterruptible power supplies (UPS), privacy screens, phone headsets, docking stations, computer memory and any other computer supplies or components required to support the technology infrastructure.

Maintenance and Service Agreements

Maintenance and Service Agreements comprise those items required to support internal and external access to routers, switches, firewalls, intrusion protection, 100-filerservers, audio visual, storage area network, data backup services, network and security monitoring, co-location data center services, video conferencing, digital certificates, development and virtualization software. Service agreements related to the co-location data center, offsite backup of over 100-terabytes of data, conference calling, network and security monitoring consume a large portion of the maintenance and service agreements budget. Additional detail is provided here:

- **Co-location Data Center** – NERC leverages a co-location facility in order to minimize the cost associated with maintenance, support and resources required to maintain a fixed data center. Infrastructure such as redundant UPS, cooling, carrier diversity, physical security, generator and raised computer flooring are contained within the co-location facility where NERC houses the majority of computing resources for the Atlanta HQ and Washington DC office.
- **Offsite Backup** – NERC ensures reliability and consistency of over 100-terabytes of data storage by leveraging an offsite backup service provider. Data is streamed from disk to an offsite hardened storage facility capable of providing data backup and restoration based upon retention and storage procedures.
- **Conference Calling Services** – Conference calling services are provided by an external service provider designed to minimize the need for an internal conference bridge or associated hardware and support persons. NERC conducts several hundred industry focused conference calls, webinars, training etc. per year and in order to ensure consistency and reliability conference calling service by an external provider was chosen.
- **Network Monitoring** – Network monitoring is real time by industry leading tools designed to proactively alert network resources of network degradation, equipment failure, or loss of connectivity. Network monitoring is utilized to ensure the stability, security and reliability of the NERC network primary and secondary Wide Area Network (WAN) and internal Local Area Network (LAN) connections.
- **Security monitoring.** Monitoring is provided by an industry recognized leader in security monitoring and implementation of best practices.

Software

Tools such as SharePoint Designer, Microsoft Visio and Crystal Reports Developer are included under this line item. The tools are primarily used for NERC infrastructure purposes to develop SharePoint workflow, create development process flows and reporting.

2013 IT Fixed Asset (Capital) Expenses

The following table presents a summary of NERC's 2013 fixed asset budget for 2013. The applicable text is crossed referenced to the budget line items in the table.

Fixed Assets	Budget 2013
Computer & Software CapEx	
Data Warehouse Hardware (1)	\$ 600,000
ERO Single Application (2)	50,000
Disaster Recovery (3)	300,000
Laptops for New Staff and Replacement (4)	174,000
Data Back-up and Storage (5)	100,000
Development Servers (6)	65,000
Software (7)	267,100
Total Computer & Software CapEx	<u>\$ 1,556,100</u>
Equipment CapEx	
ERO Single Application (2)	\$ 63,000
Network Devices (8)	153,000
Total Equipment CapEx	<u>\$ 216,000</u>

In order to provide access, visibility and analysis of data from many different sources across the ERO, it will require significant investment in hardware, software and associated tools and technology. The overarching theme is to gain a holistic view of data across the enterprise in support of reliability and accountability of the bulk power system. Adding capability to centralize and mine data, in addition to foundational elements such as disaster recovery and application development, set the stage for vastly improved reporting, business intelligence and capability for collaboration and sharing of information vital to the ERO's mission.

Among the significant investments required to support efficiency and consistency across the enterprise listed in the 2013 budget draft include Data Warehouse, ERO single application infrastructure, Disaster Recovery (DR) and associated virtualization, network, server hardware and software that consume a large portion of the OPEX/CAPEX expenditure in 2013. In addition, internal NERC environmental upgrades are required which include servers, laptops, back up and associated hardware items.

Data Warehouse Hardware (1)

A data warehouse is a repository of data, designed to provide a reliable, stable, secure environment for reporting across multiple disciplines (e.g., RAPA, Compliance, Standards, Enforcement, etc.) and requires a significant investment in large scale database and storage architecture.

As illustrated by the IT Architecture Project conducted by Deloitte and Touche conducted in first quarter 2012, NERC and the Regional Entities have many disparate sources of data, none of which are closely integrated for a holistic view across the enterprise. Implementation of a centralized data warehouse, through collaboration and consensus with the Regional Entities,

will build upon to-be-defined data input from multiple sources (e.g., Events Analysis, TADS, GADS, DADS, CRATS, etc.), providing an aggregate view across the enterprise. Design of a data warehouse is a multi-year effort that requires significant investment in hardware to store incoming transactional data from disparate data sources into a hierarchical structure targeted at building a single source of secure, reliable information. Alignment of data from disparate sources is a foundational element required to build the framework for business intelligence tools to mine data across the enterprise, build executive dashboards and establish long term trending and analysis.

ERO Single Application Infrastructure Hardware (2)

SharePoint 2010 is the tool of choice for reliable, secure, efficient, and cost effective sharing of information and collaboration with the Regional Entities and external stakeholders. SharePoint 2010 is a robust web application platform capable of supporting multiple organizations that can be coupled with third party solutions such as Enterprise Resource Planning (ERP), Customer Relationship Management (CRM) and Business Intelligence (BI) tools as required by the ERO. Implementation of SharePoint 2010 sets the foundation for integration with the Regional Entities through creation of web portals and applications designed to reduce the complexity associated with document sharing, data mining and improved productivity by reducing the need to combine data from multiple sources onto spreadsheets.

A clear example of improved efficiency is the concept developed to use SharePoint to tie violation documents to the violation. Previously there were no automated mechanisms to associate the violation record with the violation data, resulting in considerable manual effort by the Enforcement team. Through collaboration and consensus with the Regions, a concept was developed to automate the process through implementation of SharePoint document management. Further capability through claims-based management builds the framework to reduce numerous spreadsheet applications for much greater productivity and enhanced design capabilities.

In order to implement SharePoint on an enterprise scale, investment in hardware (servers), network (routers, firewalls, switches) and virtualization software is required to promote collaboration and consistency across the ERO.

Disaster Recovery Hardware (3)

Implementation of a disaster recovery plan to include hardware in support of critical IT resources (e.g., Exchange email, NERC forward facing web-site, MS SQL, etc.) is imperative for NERC in 2013. Disaster recovery is a multi-year effort that will entail both plan creation and purchase of associated hardware.

Disaster recovery is designed to put the initial framework in place to ensure survivability of the most critical assets required to sustain ERO functions. Items such as payroll, accounting, exchange messaging, internet access and phone service fall into items considered critical-to-business-operations, in addition to other applications considered necessary for the reliability of the grid. The initial implementation would be based on a risk assessment conducted by IT,

assisted by external vendors and the business to determine those items deemed most critical to the ERO's mission.

Implementation of a disaster recovery plan is a multi-year endeavor that will require continuous tuning and testing to ensure all facets of the plan are well-scripted and understood to ensure that staff, vendors and Regional Entities are prepared to enact upon declaration of a disaster event. Initial steps in 2013 include plan creation and procurement of hardware in support of essential business functions.

Laptop Replacement Hardware (4)

NERC issued laptop computers are on a three-year depreciation cycle and are rotated out as they are determined to have reached the end of the productive business cycle. Each year during the business planning and budget cycle an analysis is conducted to determine those computers that are coming due for refresh and the associated number are accounted for in the planning cycle. Throughout the year computers are refreshed as their warranty expires, or they have been determined to no longer provide effective business functions.

Servers, Network and Storage Area Network Hardware (6)

Servers located at the co-location data center are on a five year depreciation cycle designed to take advantage of the longer operational life of server equipment versus laptop equipment. Approximately 80 servers are located at the co-location data center and an analysis is conducted each year to determine those devices that are near, or at the end of the five year cycle. Servers that have been determined to no longer provide useful business functions are refreshed following the five year cycle or sooner if their operational capacity has been exceeded to lack of expansion capability.

Data Backup and Storage (5)

NERC data and information located at the co-location data center is continually backed up using a data service and appliances to back up the information to disk and then to an off-site storage location. Data is backed up every 15 minutes and follows industry best-practice for daily, weekly, monthly, quarterly and yearly backup cycles. The data is encrypted in transit and maintained following NERC established retention policies. This item includes the hardware required to backup the massive amount of ERO data anticipated for the Data Warehouse and associated environment (e.g., SharePoint collaboration sites, in addition NERC laptops and desktops).

Software (7)

Capitalized software includes items that are not covered under the standard Microsoft Enterprise Agreement (EA). Items such as Lyris Listserv licenses, Matricon, SolarWinds, KACE (support desk), Visio, Script Logic, K2-Blackpearl, Modeling software (PSLF), etc., required in support of back-office and development of both internal NERC and ERO applications.

Network Devices (8)

Network equipment such as routers, switches, firewalls, intrusion detection and protection devices are on a similar depreciation schedule as the server equipment discussed above. Each

device is designed with expansion capability in mind and is tailored to serve the ever growing demand for network bandwidth and access to vital data in support of the ERO's mission. Storage Area Network (SAN) equipment is also located at the co-location data center and is where most data is housed. The SAN equipment is a multi-terabyte storage device with several layers of redundancy to effectively store and protect NERC information.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
INFORMATION TECHNOLOGY					
	2012 Budget	2012 Projection	Variance 2012 Projection v 2012 Budget Over(Under)	2013 Budget	Variance 2013 Budget v 2012 Budget Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ -	\$ -	\$ -	\$ -	\$ -
Penalty Sanctions					
Total NERC Funding	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Total Funding (A)	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Expenses					
Personnel Expenses					
Salaries	\$ 1,412,180	\$ 1,673,683	\$ 261,504	\$ 1,651,076	\$ 238,897
Payroll Taxes	100,329	113,726	13,397	114,954	14,625
Benefits	204,053	187,354	(16,699)	224,184	20,132
Retirement Costs	203,123	185,994	(17,129)	178,464	(24,659)
Total Personnel Expenses	<u>\$ 1,919,684</u>	<u>\$ 2,160,757</u>	<u>\$ 241,073</u>	<u>\$ 2,168,678</u>	<u>\$ 248,994</u>
Meeting Expenses					
Meetings	\$ -	\$ 132	\$ 132	\$ 5,000	\$ 5,000
Travel	26,750	87,922	61,172	62,000	35,250
Conference Calls	4,800	4,295	(505)	4,800	-
Total Meeting Expenses	<u>\$ 31,550</u>	<u>\$ 92,349</u>	<u>\$ 60,799</u>	<u>\$ 71,800</u>	<u>\$ 40,250</u>
Operating Expenses					
Consultants & Contracts	\$ 1,418,000	\$ 1,489,402	\$ 71,402	\$ 2,721,000	\$ 1,303,000
Office Rent	-	-	-	-	-
Office Costs	1,898,470	1,868,907	(29,563)	1,893,725	(4,745)
Professional Services	-	574	574	-	-
Miscellaneous	1,600	348	(1,252)	500	(1,100)
Depreciation	1,360,275	943,335	(416,940)	1,123,002	(237,273)
Total Operating Expenses	<u>\$ 4,678,345</u>	<u>\$ 4,302,566</u>	<u>\$ (375,779)</u>	<u>\$ 5,738,227</u>	<u>\$ 1,059,882</u>
Total Direct Expenses	<u>\$ 6,629,579</u>	<u>\$ 6,555,672</u>	<u>\$ (73,907)</u>	<u>\$ 7,978,705</u>	<u>\$ 1,349,126</u>
Indirect Expenses	<u>(6,629,579)</u>	<u>(6,563,575)</u>	<u>66,004</u>	<u>(7,978,705)</u>	<u>(1,349,126)</u>
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	<u>\$ 0</u>	<u>\$ (7,903)</u>	<u>\$ (7,904)</u>	<u>\$ -</u>	<u>\$ (0)</u>
Change in Assets	<u>\$ (0)</u>	<u>\$ 7,903</u>	<u>\$ 7,904</u>	<u>\$ -</u>	<u>\$ 0</u>
Fixed Assets					
Depreciation	(1,360,275)	(943,335)	416,940	(1,123,002)	237,273
Computer & Software CapEx	772,090	681,132	(90,958)	1,556,100	784,010
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	90,958	90,958	216,000	216,000
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	\$ 588,185	\$ 171,245	(416,940)	\$ (649,098)	\$ (1,237,283)
Inc(Dec) in Fixed Assets (C)	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
TOTAL BUDGET (=B + C)	<u>\$ 0</u>	<u>\$ (7,903)</u>	<u>\$ (7,904)</u>	<u>\$ -</u>	<u>\$ (0)</u>
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	<u>\$ (0)</u>	<u>\$ 7,903</u>	<u>\$ 7,904</u>	<u>\$ -</u>	<u>\$ 0</u>
FTEs	12.75	15.97	3.22	16.75	4.00

Summary of Variances by Category – 2013 Budget Compared to the 2012 Budget

- **Personnel Expense** – Salaries, Payroll Taxes and Benefits costs are increasing due to the increase in FTEs in the department, but due to the change in NERC’s retirement plan, the average cost per FTE resulted in a decrease in costs in 2013.
- **Contracts and Consultants** – The increase is described in detail above.
- **Fixed Assets** – The increase is described in detail above.

Human Resources

Human Resources (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	6.00	3.00	(3.00)
Total Direct Expenses	\$ 1,444,141	\$ 1,527,797	\$ 83,656
Inc(Dec) in Fixed Assets	\$ -	\$ -	\$ -
Working Capital Requirement	\$ -	\$ -	\$ -

Background and Scope

The Human Resources (HR) area manages all of NERC's human resources functions, including new-hires, benefits, and employee functions. This area also oversees NERC's employee performance appraisal and incentive structure process. In 2010, NERC implemented a more robust, objective and auditable performance management system to track corporate, departmental and individual performance against pre-established goals, objectives and measures. Each year NERC continues to refine and improve this system. In 2011, it became fully automated. In 2012, NERC implemented a new time accounting system to facilitate tracking of time by functional activities or, where appropriate, specific projects.

2013 Goals and Objectives

Executive Training and Development

As the NERC risk-based methodology to improve reliability is further developed and deployed, experienced consultants will be used to provide strategic guidance and training for the executive team to frame problems according to highest potential risk factors and prioritize to solve big issues. The executive leadership team may also receive additional training and development initiatives geared towards promoting collaboration and consensus-building to improve knowledge-sharing and coordinated efforts on solving big reliability issues.

Staff Development

Management believes that access to knowledge is a key differentiator for NERC, ensures retention and high performance, and NERC therefore will invest in learning opportunities for staff in several areas. First, HR will continue to host and optimize an e-learning platform, SkillsSoft, to provide staff resources for improving soft and technical skills. Second, HR will provide staff development training through real-world access via tours of and training on control centers, electric substations, and power plants. Finally, staff will have access to additional education including but not limited to degree-oriented university education, pursuit of specialized certifications, and other in-house and external training that provides essential knowledge and skills development that will lead to improved staff performance.

Compensation Consulting

HR will continue to rely on market data to drive its attraction, engagement, and retention model. Periodically, HR will have a compensation consultant examine the current market data to ensure that all decisions affecting compensation are made in light of the current market climate and that qualified employees are attracted and retained within a defined total remuneration range. To protect NERC's substantial investment in human capital, HR will also engage consultants to consider compensation models and practices prevalent within the market that have been successful in attracting, engaging, and retaining talent. Similarly, HR may partner with compensation subject matter experts to perform periodic assessments of the BOT compensation model to ensure alignment with market practices. NERC's compensation policy and analysis of market data will be based on total remuneration, taking into account base and incentive compensation, as well as benefits.

Surveys

HR will retain a vendor to design stakeholder and other surveys, as well as to analyze survey results and will assist in identifying and implementing improvements in the Board of Trustees, Member Representatives Committee, and NERC Board of Trustees' committees surveys, as well as launch additional surveys including: (1) a Compliance and Certification Committee (CCC) survey to evaluate industry's perspectives on NERC's effectiveness in improving reliability and (2) an internal employee climate survey.

Succession Planning

Critical to continued success towards ensuring the reliability of the bulk power system is minimizing disruption of knowledge/skill/experience bases of key staff. HR will partner with TalentQuest to leverage best practices and software tools to systemically identify essential roles and develop strategies to build pipelines and contingency plans for any loss of staff.

HR Products and Services Automation

Paramount to an effective/efficient HR department is the use of electronic and automated products and services. HR will continue development of a user-friendly, easy-to-access suite of HR solutions by continuing investment in electronic platforms. These investments include converting HR to a "paperless" function, launching a single sign on for employees whereby they can access all tools with one set of log-in credentials, adding additional capabilities including an online benefits enrollment system, and optimizing online time and attendance, training, and performance management tools.

Resource Requirements

Personnel

Two FTEs transferred to other departments in 2012. In addition, HR staffing will be reduced by one (1) FTE in 2013.

Contractor Expenses

Contractor and consultant expenses are roughly in line with 2012 budgeted amounts and are set forth in additional detail in Exhibit B.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
HUMAN RESOURCES					
	2012	2012	Variance	2013	Variance
Funding	Budget	Projection	v 2012 Budget	Budget	v 2012 Budget
			Over(Under)		Over(Under)
ERO Funding					
NERC Assessments	\$ -	\$ -	\$ -	\$ -	\$ -
Penalty Sanctions	-	-	-	-	-
Total NERC Funding	\$ -	\$ -	\$ -	\$ -	\$ -
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Total Funding (A)	\$ -	\$ -	\$ -	\$ -	\$ -
Expenses					
Personnel Expenses					
Salaries	\$ 711,539	\$ 572,531	\$ (139,008)	\$ 498,724	\$ (212,815)
Payroll Taxes	37,353	28,299	(9,054)	22,610	(14,743)
Benefits	294,372	97,030	(197,342)	573,737	279,365
Retirement Costs	70,798	48,809	(21,989)	41,348	(29,450)
Total Personnel Expenses	\$ 1,114,062	\$ 746,669	\$ (367,393)	\$ 1,136,419	\$ 22,357
Meeting Expenses					
Meetings	\$ 11,385	\$ 11,385	\$ -	\$ 5,000	\$ (6,385)
Travel	7,000	16,607	9,607	21,000	14,000
Conference Calls	600	2,472	1,872	600	-
Total Meeting Expenses	\$ 18,985	\$ 30,465	\$ 11,480	\$ 26,600	\$ 7,615
Operating Expenses					
Consultants & Contracts	\$ 290,000	\$ 321,324	\$ 31,324	\$ 288,500	\$ (1,500)
Office Rent	-	-	-	-	-
Office Costs	13,094	50,964	37,870	42,500	29,406
Professional Services	5,000	9,000	4,000	23,278	18,278
Miscellaneous	3,000	3,000	-	10,500	7,500
Depreciation	-	-	-	-	-
Total Operating Expenses	\$ 311,094	\$ 384,288	\$ 73,194	\$ 364,778	\$ 53,684
Total Direct Expenses	\$ 1,444,141	\$ 1,161,422	\$ (282,719)	\$ 1,527,797	\$ 83,656
Indirect Expenses	\$ (1,444,141)	\$ (1,161,422)	\$ 282,719	\$ (1,527,797)	\$ (83,656)
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ -	\$ -	\$ -	\$ -	\$ 0
Change in Assets	\$ -	\$ -	\$ -	\$ -	\$ (0)
Fixed Assets					
Depreciation	-	-	-	-	-
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	\$ -	\$ -	\$ -	-	-
Inc(Dec) in Fixed Assets (C)	\$ -	\$ -	\$ -	\$ -	\$ -
TOTAL BUDGET (=B + C)	\$ -	\$ -	\$ -	\$ -	\$ 0
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ -	\$ -	\$ -	\$ -	\$ (0)
FTEs	6.00	4.00	(2.00)	3.00	(3.00)

Summary of Variances by Category – 2013 Budget Compared to the 2012 Budget

- **Personnel Expense** – Salaries, Payroll Taxes and Retirement costs are decreasing is due to having 3.0 fewer FTEs in the department in 2013. The increase in Benefits expense is primarily due to including the cost of providing parking for employees (formerly part of Office Rent expense) at the Atlanta and Washington, D.C. offices. The cost of providing employee parking was abated for most of 2012 in Atlanta per the terms of the lease agreement.
- **Travel** – The increase in travel is related to time spent in the Washington, DC office and to quarterly Board of Trustees meetings.
- **Office Costs** – The increase is due to annual maintenance fees for software that provides employee training courses.
- **Professional Services** – The increase is related to implementation of a third-party Human Resources Information System that provides employees access to their entire payroll and benefit information through an online system.
- **Miscellaneous Expenses** – As previously described, the increase is related to \$10k budgeted solely in Human Resources for employee rewards and recognition. NERC has added a new account to the System of Accounts which will roll-up with other miscellaneous expenses and will be used to track actual employee rewards and recognition expenses in 2013. (Refer to Table B-9 on page 119).

Finance and Accounting

Accounting and Finance (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	9.00	11.00	2.00
Total Direct Expenses	\$ 1,872,296	\$ 2,201,294	\$ 328,998
Inc(Dec) in Fixed Assets	\$ (771)	\$ (798)	\$ (27)
Working Capital Requirement	\$ 0	\$ -	\$ (0)

Background and Scope

NERC's Finance and Accounting department manages all finance and accounting functions, including employee payroll, 401(k) and 457(b) plans, travel and expense reporting, monthly financial reporting, sales and use tax, meeting/events planning and services, insurance, internal auditing, and facilities management. This area also holds primary responsibility for the development of the annual business plan and budget, as well as NERC's proposed ERO risk management framework. Over the past several years, NERC's Finance and Accounting department implemented additional policies, procedures and controls governing day to day practices including contract and personnel procurements, meeting, conference planning and travel, expense reimbursement and back office systems and procedures. The department will

continue to refine, improve and where necessary implement additional procedures and controls.

Resource Requirements

Personnel

One (1) FTE was added in 2012 to provide facilities management and one (1) FTE was added in 2012 to provide additional administrative and internal controls support. No new FTE additions are planned for 2013.

Contractor Expenses

\$325k is budgeted for outside auditors to support audit program review and Regional Entity oversight by the the Compliance Operations and Critical Infrastructure Protection departments as part of the internal controls and risk management function. The budget is consistent with 2012. To the extent that consulting support is required address regulatory directives affecting NERC's financial, accounting, budgeting processes and/or systems these additional costs will be funded from operating reserves in accordance with the company's approved Working Capital and Operating Reserve Guidelines.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
FINANCE and ACCOUNTING					
	2012 Budget	2012 Projection	Variance 2012 Projection v 2012 Budget Over(Under)	2013 Budget	Variance 2013 Budget v 2012 Budget Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ -	\$ -	\$ -	\$ -	\$ -
Penalty Sanctions		-		-	
Total NERC Funding	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Total Funding (A)	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Expenses					
Personnel Expenses					
Salaries	\$ 1,023,527	\$ 1,198,983	\$ 175,456	\$ 1,230,355	\$ 206,828
Payroll Taxes	64,896	67,861	2,965	70,460	5,564
Benefits	142,111	137,107	(5,004)	149,964	7,853
Retirement Costs	144,750	132,414	(12,336)	140,368	(4,382)
Total Personnel Expenses	<u>\$ 1,375,285</u>	<u>\$ 1,536,365</u>	<u>\$ 161,081</u>	<u>\$ 1,591,146</u>	<u>\$ 215,862</u>
Meeting Expenses					
Meetings	\$ 500	\$ 500	\$ -	\$ 5,000	\$ 4,500
Travel	40,000	54,566	14,566	62,500	22,500
Conference Calls	1,850	1,000	(850)	1,850	-
Total Meeting Expenses	<u>\$ 42,350</u>	<u>\$ 56,066</u>	<u>\$ 13,716</u>	<u>\$ 69,350</u>	<u>\$ 27,000</u>
Operating Expenses					
Consultants & Contracts	\$ 325,000	\$ 434,723	\$ 109,723	\$ 325,000	\$ -
Office Rent	-	-	-	-	-
Office Costs	8,790	41,341	32,551	28,500	19,710
Professional Services	120,000	120,000	-	186,000	66,000
Miscellaneous	100	100	-	500	400
Depreciation	771	798	27	798	27
Total Operating Expenses	<u>\$ 454,661</u>	<u>\$ 596,962</u>	<u>\$ 142,301</u>	<u>\$ 540,798</u>	<u>\$ 86,137</u>
Total Direct Expenses	<u>\$ 1,872,296</u>	<u>\$ 2,189,394</u>	<u>\$ 317,099</u>	<u>\$ 2,201,294</u>	<u>\$ 328,999</u>
Indirect Expenses	<u>\$ (1,872,296)</u>	<u>\$ (2,189,394)</u>	<u>\$ (317,098)</u>	<u>\$ (2,201,294)</u>	<u>\$ (328,998)</u>
Other Non-Operating Expenses	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Total Expenses (B)	<u>\$ (0)</u>	<u>\$ -</u>	<u>\$ 0</u>	<u>\$ -</u>	<u>\$ 0</u>
Change in Assets	<u>\$ 0</u>	<u>\$ -</u>	<u>\$ (0)</u>	<u>\$ -</u>	<u>\$ (0)</u>
Fixed Assets					
Depreciation	(771)	(798)	(27)	(798)	(27)
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	\$ 771	\$ 798	\$ 27	\$ 798	\$ 27
Inc(Dec) in Fixed Assets (C)	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
TOTAL BUDGET (=B + C)	<u>\$ (0)</u>	<u>\$ -</u>	<u>\$ 0</u>	<u>\$ -</u>	<u>\$ 0</u>
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	<u>\$ 0</u>	<u>\$ -</u>	<u>\$ (0)</u>	<u>\$ -</u>	<u>\$ (0)</u>
FTEs	9.00	10.79	1.79	11.00	2.00

Summary of Variances by Category – 2013 Budget Compared to the 2012 Budget

- **Personnel Expenses** – Salaries, Payroll Taxes and Benefits expenses are projected to increase in 2013 due to adding 2.0 FTEs, but the change to NERC’s retirement plans reduced Retirement Costs per FTE and resulted in a projected decrease in 2013.
- **Travel Expenses** – The increase is related to adding 2.0 FTEs and to an increase in travel for meeting planning and the internal controls and risk management functions.
- **Office Costs** – Higher cell phone and wireless air card charges associated with additional FTEs on staff.
- **Professional Services** – Accounting and Auditing Fees are projected to increase in 2013 due to higher fees associated with the external audit of NERC’s financial records and the 401k Plan

Section B — Supplemental Financial Information

Reserve Balance

Table B-1

Working Capital Reserve Analysis 2012-2013					
STATUTORY					
	Total Reserve	Working Capital	Operating Reserve	Contingency Reserve	System Operator Testing-PCGC
Beginning Working Capital Reserve (Deficit), December 31, 2011	3,836,373	2,403,271			1,433,102
Plus: 2012 Funding (from LSEs or designees)	50,661,271	50,661,271			
Plus: 2012 Other funding sources	2,606,236	1,137,206			1,469,031
Less: 2012 Projected expenses & capital expenditures	(51,663,132)	(50,515,438)			(1,147,693)
Projected Working Capital Reserve (Deficit), December 31, 2012	5,440,748	3,686,309	0	0	1,754,439
Desired Working Capital Reserve, December 31, 2013 ¹	3,407,149	0	1,000,000	1,000,000	1,407,149
Minus: Projected Working Capital Reserve, December 31, 2012	5,440,748	3,686,309	0	0	1,754,439
Increase(decrease) in funding requirement to achieve Working Capital Reserve	(2,033,600)	(3,686,309)	1,000,000	1,000,000	(347,290)
2013 Expenses and Capital Expenditures	54,286,256				
Less: Penalty Sanctions ²	(2,512,500)				
Less: Other Funding Sources	(2,136,000)				
Adjustment to achieve desired Working Capital Reserve	(2,033,600)				
2013 NERC Assessment	47,604,156				

¹ On August 16, 2012, the NERC Board of Trustees approved the proposed Working Capital and Operating Reserves Policy set forth herein.

² Represents collections on or prior to June 30, 2012.

Breakdown by Statement of Activity Sections

The following detailed schedules are in support of the consolidated Statement of Activities. All significant variances have been disclosed by program area in the preceding pages.

Penalty Monies

Penalty monies received prior to June 30, 2012 are to be used to offset assessments in the 2013 Budget, as documented in the NERC Policy – Accounting, Financial Statement and Budgetary Treatment of Penalties Imposed and Received for Violations of Reliability Standard, as well as Section 1107 of the Rules of Procedure. Penalty monies received from July 1, 2012 through June 30, 2013 will be used to offset assessments in the 2014 Budget.

All penalties received prior to June 30, 2012 are detailed below, including the amount and date received.

Allocation Method

Penalty payments received have been allocated to the following statutory programs to reduce assessments: Reliability Standards; Compliance Operations and Organization Registration and

Certification; Compliance Enforcement; Reliability Assessments and Performance Analysis; Training and Education; Situational Awareness; Events Analysis and Investigations; and the Critical Infrastructure Department. Penalty monies are allocated based upon the number of FTEs in the Program divided by the aggregate total FTEs in the Programs receiving the allocation.

Table B-2

Penalty Sanctions Received On or Prior to June 30, 2012		
	Date Received	Amount Received
	7/17/2011	\$ 175,000
	9/9/2011	175,000
	9/14/2011	100,000
	12/7/2011	1,962,500
	6/28/2012	100,000
Total Penalties Received		<u>\$ 2,512,500</u>

Supplemental Funding

Table B-3

Outside Funding Breakdown By Program (Excluding Penalty Sanction)	Budget 2012	Projection 2012	Budget 2013	Variance 2013 Budget v 2012 Budget
Reliability Standards				
Workshops		\$ 40,500	\$ 104,000	\$ 104,000
Interest Allocation	3,864	3,773	3,970	106
Total	\$ 3,864	\$ 44,273	\$ 107,970	\$ 104,106
Compliance Operations, Investigations and Enforcement				
Workshops	\$ -	\$ 36,025	\$ 40,000	\$ 40,000
Interest Allocation	6,614	6,203	6,742	128
Total	\$ 6,614	\$ 42,228	\$ 46,742	\$ 40,128
Reliability Assessments and Performance Analysis				
pc_GAR Software	\$ 75,000	\$ -	\$ -	\$ (75,000)
GADS Services	175,000	125,000	-	(175,000)
Workshops		-	40,000	40,000
Interest Allocation	2,558	2,838	2,809	251
Total	\$ 252,558	\$ 127,838	\$ 42,809	\$ (209,749)
Training and Education				
Testing Fees and Certificate Renewals	\$ 1,461,000	\$ 1,469,000	\$ 1,080,000	\$ (381,000)
CEH Fees	600,000	639,200	600,000	-
Workshops	120,000	-	-	(120,000)
Interest Allocation	1,047	1,106	1,199	152
Total	\$ 2,182,047	\$ 2,109,306	\$ 1,681,199	\$ (500,848)
Event Analysis				
Workshops	\$ -	\$ 66,000	\$ 52,000	\$ 52,000
Interest Allocation	2,016	2,410	1,423	(593)
Total	\$ 2,016	\$ 68,410	\$ 53,423	\$ 51,407
Situation Awareness				
Workshops	\$ -	\$ 103,175	\$ 105,000	\$ 105,000
FIST Royalties		10,500		-
Interest Allocation	3,902	959	974	(2,928)
Total	\$ 3,902	\$ 114,634	\$ 105,974	\$ 102,072
Critical Infrastructure Protection				
Workshops	\$ -	\$ 95,000	\$ 95,000	\$ 95,000
Interest Allocation	-	2,711	2,884	2,884
Total	\$ -	\$ 97,711	\$ 97,884	\$ 97,884
General and Administrative				
Miscellaneous Income	\$ -	\$ 1,806	\$ -	\$ -
Total	\$ -	\$ 1,806	\$ -	\$ -
Total Outside Funding	\$ 2,451,001	\$ 2,606,206	\$ 2,136,000	\$ (315,001)

Explanation of Significant Variances – 2103 Budget versus 2012 Budget

- All Workshop Fees and related expenses were budgeted in the Training and Education Program in 2012, but Projected 2012 and Budgeted 2013 fees and expenses are being recorded in the Program sponsoring the workshop.

- Reliability Assessments and Performance Analysis - The decrease in funding from Services and Software, which primarily comes licensing the GADS software to third parties, is due to NERC no longer actively pursuing these revenues.
- Training and Education – The reduction in Testing Fees and Certificate Renewals is due to the decision by the Personnel Certification Governance Committee to reduce testing and certificate renewal fees in 2013 to levels below the amount needed to offset the projected 2013 expenses of the System Operator Testing and Certification Program to reduce the level of excess working capital generated from 2010 through 2012 as explained in further detail in the “Working Capital and Operating Reserve Policy”, which follows in Exhibit C.

Personnel Expenses

Table B-4

Personnel Expenses	Budget 2012	Projection 2012	Budget 2013	Variance 2013 Budget v 2012 Budget	Variance %
Total Salaries	\$ 24,800,833	\$ 23,245,401	\$ 24,056,166	\$ (744,667)	-3.0%
Total Payroll Taxes	1,524,935	1,397,780	1,459,710	(65,225)	-4.3%
Total Benefits	3,190,308	2,479,453	3,079,941	(110,367)	-3.5%
Total Retirement	3,489,736	2,420,586	2,702,588	(787,148)	-22.6%
Total Personnel Costs	\$ 33,005,812	\$ 29,543,220	\$ 31,298,405	\$ (1,707,407)	-5.2%
FTEs	176.75	170.81	186.25	9.50	5.4%
Cost per FTE					
Salaries	\$ 140,316	\$ 136,089	\$ 129,161	(11,155)	-8.0%
Payroll Taxes	8,628	8,183	7,837	(790)	-9.2%
Benefits	18,050	14,516	16,537	(1,513)	-8.4%
Retirement	19,744	14,171	14,511	(5,233)	-26.5%
Total Cost per FTE	\$ 186,737	\$ 172,960	\$ 168,045	\$ (18,692)	-10.0%

- **Explanation of Significant Variances – 2103 Budget versus 2012 Budget** Salary and Payroll Taxes - In addition to phasing the timing of new hires in 2013, NERC assumed a 3% personnel attrition rate based on current trends, which reduced the budget for Salaries and Payroll Tax expenses even though 9.5 FTEs are being added and reduced the average cost per FTE.
- Changes to NERC’s employee benefit and retirement plans resulted in a lower budget and lower average costs per FTE in 2013 compared to the 2012 budget.

Consultants and Contracts**Table B-5***NOTE: This table has been replaced by Exhibit B***Office Rent****Table B-6**

Rent	Budget 2012	Projection 2012	Budget 2013	Variance 2013 Budget v 2012 Budget	Variance %
Office Rent	\$ 2,304,257	\$ 2,784,036	\$ 2,756,840	\$ 452,583	19.64%
Utilities			-	-	
Maintenance			-	-	
Total Office Rent	\$ 2,304,257	\$ 2,784,036	\$ 2,756,840	\$ 452,583	19.64%

Explanation of Significant Variances – 2103 Budget versus 2012 Budget

The increased rent expense reflects the amortization of the lease costs for NERC office space over the term of the leases and the estimated cost of increasing leased space in Atlanta.

Office Costs**Table B-7**

Office Costs	Budget 2012	Projection 2012	Budget 2013	Variance 2013 Budget v 2012 Budget	Variance %
Telephone	\$ 441,280	\$ 565,221	\$ 527,000	\$ 85,720	19.43%
Telephone Answering Srv	2,400	2,167	-	(2,400)	-100.00%
Internet	312,900	644,744	354,000	41,100	13.14%
Office Supplies	170,600	160,663	172,500	1,900	1.11%
Computer Supplies and Maintenance	-	-	-	-	-
Computers	37,000	14,103	3,000	(34,000)	-91.89%
Computer Supplies	91,400	147,708	116,900	25,500	27.90%
Maintenance & Service Agreements	1,168,400	1,024,211	1,404,265	235,865	20.19%
Software	130,670	13,449	38,500	(92,170)	-70.54%
Network Supplies	-	597	-	-	-
Publications & Subscriptions	50,500	74,653	73,000	22,500	44.55%
Dues	33,250	40,692	42,750	9,500	28.57%
Postage	24,200	17,616	20,100	(4,100)	-16.94%
Express Shipping	49,000	54,985	64,500	15,500	31.63%
Copying	139,000	123,270	135,000	(4,000)	-2.88%
Reports	3,219	1,380	8,000	4,781	148.52%
Stationary/Forms	15,000	-	15,000	-	0.00%
Equipment Repair/Service Contracts	25,000	65,537	30,000	5,000	20.00%
Bank Charges	15,000	28,092	25,000	10,000	66.67%
Taxes	50,000	121	50,000	-	0.00%
Merchant Card Fees	80,000	83,592	102,000	22,000	27.50%
Total Office Costs	\$ 2,838,819	\$ 3,062,803	\$ 3,181,515	\$ 342,696	12.07%

Explanation of Significant Variances – 2103 Budget versus 2012 Budget

- Telephone expense is for cell phone and wireless internet access and the increase is related to having more staff using these services.
- Maintenance and Service Agreements – The increase is primarily related to expanded space requirements at the offsite data center and higher costs associated with off-site backup and security monitoring agreements.
- Publications and Subscriptions – The increase is primarily related to critical intelligence publications budgeted in the Critical Infrastructure Department
- Merchant Card Fees – Primarily due to an increase in the number of workshops which are funded by fees charged and paid primarily with credit cards.

Professional Services

Table B-8

Professional Services	Budget 2012	Projection 2012	Budget 2013	Variance 2013 Budget v 2012 Budget	Variance %
Independent Trustee Fees	\$ 980,000	\$ 980,000	\$ 980,000	\$ -	0.00%
Trustee Search Fee	75,000	75,000	-	(75,000)	-100.00%
Outside Legal	700,000	1,316,290	900,000	200,000	28.57%
Lobbying Fees	50,000	50,000	50,000	-	0.00%
Accounting & Auditing Fees	125,000	242,735	242,278	117,278	93.82%
Insurance Commercial	75,000	103,000	110,000	35,000	46.67%
Total Services	\$ 2,005,000	\$ 2,767,025	\$ 2,282,278	\$ 277,278	13.83%

Explanation of Significant Variances – 2103 Budget versus 2012 Budget

- Two Trustees will be appointed to the Board in 2013, however the estimated fees associated with the search for the new trustees will be incurred in 2012. Any excess cost above the 2012 Budget will be funded through operating reserves.
- Outside Legal – Outside law firms are used to support NERC’s internal legal and regulatory staff due to increased demands and responsibilities
- Accounting and Auditing Fees are projected to increase in 2013 due to higher fees associated with the external audit of NERC’s financial records and the 401k Plan, implementation of a full Human Resources Information System and implementation of a new timekeeping system
- Insurance costs are increasing as a result of NERC’s investments and expansions of its offices and data center

Miscellaneous

Table B-9

Miscellaneous Expenses	Budget 2012	Projection 2012	Budget 2013	Variance 2013 Budget v 2012 Budget	Variance %
Miscellaneous Expense	\$ 21,500	\$ 21,896	\$ 6,500	\$ (15,000)	-69.77%
Employee Rewards and Recognition		-	\$ 10,000	10,000	
Community Resp & Employee Engagement			5,000	5,000	
Total Miscellaneous Expenses	\$ 21,500	\$ 21,896	\$ 21,500	\$ -	0.00%

Explanation of Significant Variances – 2103 Budget versus 2012 Budget

NERC is adding two new accounts to the System of Accounts to separately track Employee Rewards and Recognition expenses and a new initiative for Community Responsibility and Employee Engagement.

Other Non-Operating Expenses**Table B-10**

Other Non-Operating Expenses	Budget 2012	Projection 2012	Budget 2013	Variance 2013 Budget v 2012 Budget	Variance %
Gain/Loss from Sale of Assets	\$ -	\$ -	\$ -	\$ -	
Property Tax Expense		50,000	\$ 50,000	50,000	
Office Relocation	-	18,903	-	-	
Total Other Non-Operating Expenses	\$ -	\$ 68,903	\$ 50,000	\$ 50,000	

Explanation of Significant Variances – 2103 Budget versus 2012 Budget

NERC is subject to property tax expense in Atlanta, Georgia based on the value of property and equipment in the Atlanta office and data center locations.

Section C — Non-Statutory Activity

NERC has no non-statutory activities.

Section D — Supplemental Financial Statements

Statement of Financial Position 2011 Audited, 2012 Projection, and 2013 Budget

STATUTORY

	(Per Audit) 31-Dec-11	Projected 31-Dec-12	Budget 31-Dec-13
ASSETS			
Cash - unrestricted	16,603,649	14,614,351	12,288,295
Cash - restricted	2,412,500	2,512,500	
Trade Accounts receivable, net of allowance for uncollectible accounts of \$152,323 (2009)	3,542,891	3,542,891	3,542,891
Prepaid expenses and other current assets	551,841	551,841	551,841
Security deposit	114,903	114,903	114,903
Cash value of insurance policies	282,098	282,098	282,098
Property and equipment	5,088,886	4,416,886	4,609,185
Total Assets	28,596,769	26,035,471	21,389,213
LIABILITIES AND NET ASSETS			
Liabilities			
Accounts payable and accrued expenses	3,870,395	3,870,395	3,870,395
Deferred Rent	880,941	1,607,864	1,491,165
Deferred income	2,644,176	2,644,176	2,644,176
Regional assessments	4,675,028	-	-
Deferred compensation	594,629	594,629	594,629
Accrued retirement liabilities	1,682,481	1,364,403	1,524,265
Accrued incentive compensation	2,911,359	3,583,900	3,248,280
Total Liabilities	17,259,010	13,665,367	13,372,910
Net Assets - unrestricted	8,925,258	9,857,603	8,016,302
Net Assets -temporarily restricted	2,412,500	2,512,500	
Total Liabilities and Net Assets	28,596,768	26,035,471	21,389,213

NORTH AMERICAN ELECTRIC RELIABILITY COPORATION

Statement of Activities, Fixed Asset Expenditures and Change in Working Capital by Program 2013 Budget	Total	Statutory Total	Non-Statutory Total	Statutory Activities															
				Statutory Total	Reliability Standards (Section 300)	Compliance Operations, Investigations and Organization Registration and Certification	Compliance Enforcement	Reliability Assessment and Performance Analysis	Training and Education	Event Analysis	Situation Awareness and Infrastructure Security	Critical Infrastructure Protection	Committee and Member Forums	General and Administrative (Includes Executive and Gov't Relations)	Legal and Regulatory	Information Technology	Human Resources	Accounting and Finance	
Funding																			
ERO Funding																			
NERC Assessments	47,604,156	47,604,156	-	47,604,156	9,156,330	8,422,798	6,317,083	7,358,220	1,449,793	3,501,894	5,093,049	7,991,299	-	(1,686,309)	-	-	-	-	-
Penalty Sanctions	2,512,500	2,512,500	-	2,512,500	510,788	462,601	404,776	361,407	93,484	183,113	125,288	371,044	-	-	-	-	-	-	-
Total NERC Funding	50,116,656	50,116,656	-	50,116,656	9,667,118	8,885,399	6,721,858	7,719,627	1,543,277	3,685,006	5,218,337	8,362,343	-	(1,686,309)	-	-	-	-	-
Membership Dues	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Testing Fees	1,680,000	1,680,000	-	1,680,000	-	-	-	-	1,680,000	-	-	-	-	-	-	-	-	-	-
Services & Software	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Workshops	436,000	436,000	-	436,000	104,000	40,000	-	40,000	-	52,000	105,000	95,000	-	-	-	-	-	-	-
Interest	20,000	20,000	-	20,000	3,970	3,596	3,146	2,809	1,199	1,423	974	2,884	-	-	-	-	-	-	-
Miscellaneous	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Funding (A)	52,252,656	52,252,656	-	52,252,656	9,775,088	8,928,994	6,725,004	7,762,436	3,224,476	3,738,430	5,324,311	8,460,227	-	(1,686,309)	-	-	-	-	-
Expenses																			
Personnel Expenses																			
Salaries	24,056,166	24,056,166	-	24,056,166	3,335,519	3,202,041	2,152,370	2,429,590	837,645	1,340,677	856,927	2,853,871	1,342,080	2,325,293	1,651,076	498,724	1,230,355		
Payroll Taxes	1,459,710	1,459,710	-	1,459,710	213,052	202,103	140,794	150,215	54,087	82,107	56,925	172,586	60,640	119,177	114,954	22,610	70,460		
Benefits	3,079,941	3,079,941	-	3,079,941	350,484	325,579	274,883	262,762	112,397	125,335	87,659	250,885	156,238	185,835	224,184	573,737	149,964		
Retirement Costs	2,702,588	2,702,588	-	2,702,588	362,334	368,031	247,200	269,736	94,203	153,189	98,496	312,315	175,179	261,724	178,464	41,348	140,368		
Total Personnel Expenses	31,298,405	31,298,405	-	31,298,405	4,261,388	4,097,754	2,815,246	3,112,303	1,098,332	1,701,309	1,100,007	3,589,657	-	1,734,136	2,892,029	2,168,678	1,136,419	1,591,146	
Meeting Expenses																			
Meetings	1,042,000	1,042,000	-	1,042,000	164,000	80,000	5,000	78,000	30,000	62,000	198,000	145,000	260,000	5,000	5,000	5,000	5,000		
Travel	2,738,500	2,738,500	-	2,738,500	372,500	440,500	186,000	410,000	70,000	155,000	72,500	420,000	322,000	144,500	62,000	21,000	62,500		
Conference Calls	317,810	317,810	-	317,810	108,500	34,235	-	31,950	27,000	-	24,175	24,000	57,500	3,200	4,800	600	1,850		
Total Meeting Expenses	4,098,310	4,098,310	-	4,098,310	645,000	554,735	191,000	519,950	127,000	217,000	294,675	589,000	-	639,500	152,700	71,800	26,600	69,350	
Operating Expenses																			
Consultants & Contracts	8,816,254	8,816,254	-	8,816,254	150,000	-	-	685,000	848,574	120,000	2,743,180	785,000	150,000	-	2,721,000	288,500	325,000		
Office Rent	2,756,840	2,756,840	-	2,756,840	-	-	-	-	-	-	-	-	2,756,840	-	-	-	-		
Office Costs	3,181,515	3,181,515	-	3,181,515	77,850	73,424	41,000	161,416	96,500	36,100	47,750	125,250	507,000	50,500	1,893,725	42,500	28,500		
Professional Services	2,291,331	2,291,331	-	2,291,331	-	-	-	-	-	-	-	-	1,132,053	950,000	-	23,278	186,000		
Miscellaneous	21,500	21,500	-	21,500	500	500	500	500	500	500	500	500	5,500	500	500	10,500	500		
Depreciation	1,579,801	1,579,801	-	1,579,801	60,630	-	37,450	-	37,450	-	-	7,395	350,526	-	1,123,002	798	-		
Total Operating Expenses	18,647,242	18,647,242	-	18,647,242	228,350	134,554	41,500	884,366	945,574	156,600	2,798,825	910,750	-	4,901,919	1,001,000	5,738,227	364,778	540,798	
Total Direct Expenses	54,043,957	54,043,957	-	54,043,957	5,134,738	4,787,043	3,047,746	4,516,620	2,170,906	2,074,908	4,193,507	5,089,407	-	7,275,556	4,045,729	7,978,705	1,527,797	2,201,294	
Indirect Expenses																			
	-	-	-	-	4,581,241	4,149,048	3,630,417	3,241,444	1,383,016	1,642,332	1,123,701	3,327,882	-	(7,325,556)	(4,045,729)	(7,978,705)	(1,527,797)	(2,201,294)	
Other Non-Operating Expenses	50,000	50,000	-	50,000	-	-	-	-	-	-	-	-	-	50,000	-	-	-	-	-
Total Expenses (B)	54,093,957	54,093,957	-	54,093,957	9,715,979	8,936,092	6,678,163	7,758,064	3,553,922	3,717,240	5,317,208	8,417,290	-	-	-	-	-	-	-
Change in Assets	(1,841,301)	(1,841,301)	-	(1,841,301)	59,109	(7,098)	46,841	4,372	(329,446)	21,190	7,103	42,937	-	(1,686,309)	-	-	-	-	-
Fixed Assets																			
Depreciation	(1,579,801)	(1,579,801)	-	(1,579,801)	-	(60,630)	-	(37,450)	-	-	(7,395)	-	(350,526)	-	(1,123,002)	-	(798)		
Computer & Software CapEx	1,556,100	1,556,100	-	1,556,100	-	-	-	-	-	-	-	-	1,556,100	-	-	-	-		
Furniture & Fixtures CapEx	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Equipment CapEx	216,000	216,000	-	216,000	-	-	-	-	-	-	-	-	-	-	216,000	-	-		
Leasehold Improvements	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Allocation of Fixed Assets	-	-	-	-	59,109	53,532	46,841	41,822	17,844	21,190	14,498	42,937	350,526	-	(649,098)	-	798		
Incl(Dec) in Fixed Assets (C)	192,299	192,299	-	192,299	59,109	(7,098)	46,841	4,372	17,844	21,190	7,103	42,937	-	-	-	-	-	-	-
TOTAL BUDGET (=B + C)	54,286,256	54,286,256	-	54,286,256	9,775,088	8,928,994	6,725,004	7,762,436	3,571,766	3,738,430	5,324,311	8,460,227	-	-	-	-	-	-	-
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	(2,033,600)	(2,033,600)	-	(2,033,600)	(0)	0	0	0	(347,290)	-	(0)	0	-	(1,686,309)	-	-	-	-	-
FTEs	186.25	186.25	-	186.25	26.50	24.00	21.00	18.75	8.00	9.50	6.50	19.25	-	8.00	14.00	16.75	3.00	11.00	

Exhibit A — Common Assumptions

Shared Business Plan and Budget Assumptions

NERC and the Regional Entities 2013-2015 Planning Period

Commencing in December 2011, NERC and the eight Regional Entities have been collaborating in the development of a common set of business planning goals, objectives and assumptions for the 2013-2015 planning period. This effort included the development of a mutually agreed upon Strategic Plan (http://www.nerc.com/filez/business_plan_2013.html).

As part of the implementation of the Strategic Plan, NERC and the Regional Entities developed a set of common assumptions that are now used to guide resource projections over the planning period for each entity and the ERO overall, recognizing there are often unique factors that drive differences in each organization's final determination of its resource needs and budget. The specific resource needs and budget of NERC and each Regional Entity will continue to be publicly posted for review and approved in open session by NERC's Finance and Audit Committee as part of the annual business plan and budget process.

It continues to be the objective of NERC and the Regional Entities to strive to identify and implement process and other improvements to increase the overall efficiency and effectiveness of the ERO, with due recognition and sensitivity to the cost of compliance by industry and the critical nature of industry support and participation to the success of the ERO regulatory model as contemplated by the Energy Policy Act of 2005. It is neither the goal nor objective of NERC and the Regional Entities to simply expand the scope of program areas or resources. Efforts have been made to focus on assumptions affecting resource requirements versus specific program area goals, objectives and actions. This document is an update to the initial draft of the common business plan and budget assumptions which were posted on NERC's website on February 21, 2012 and reflects consideration of the comments received on that draft, which are also posted on NERC's website.

Legal and Operating Framework

NERC and the Regional Entities are expected to continue to work under the existing regulatory framework governing the establishment and enforcement of reliability standards for the bulk power system established by applicable governmental authorities in the United States and Canada, as well as the authorizations contained in FERC's order approving NERC as the ERO. No significant changes to this framework are assumed to occur over the planning period. However, the final determination of what constitutes the Bulk Electric System (BES) may affect the scope of ERO jurisdictional facilities. This is not expected to be known until 2013.

The terms of the existing delegation agreements between NERC and the Regional Entities are also assumed to continue to apply over the planning period. With respect to day to day routine operation of the ERO, the Regional Entities are expected to have the primary responsibility for interactions with registered entities. NERC will provide oversight of the Regional Entities and

otherwise ensure that its responsibilities as the ERO are fulfilled. Over the planning period, NERC and the Regional Entities are also expected to refine and revise procedures to eliminate duplication, increase operational efficiencies, enhance ERO-wide consistency, and achieve measurable reliability outcomes, consistent with their respective roles and responsibilities.

Business Environment

NERC and the Regional Entities will work collaboratively to identify additional ways to improve efficiency and leverage overall ERO resources. Industry concerns relative to the overall cost of compliance with ERO requirements will likely continue.

Cost pressures may affect stakeholder resources available to participate in NERC and Regional Entity activities. NERC and the Regional Entities business plans, budgets, and resource requirements will continue to be established based upon the assumption of continued industry participation in support of key program areas, including but not limited to standards development, event analysis and reliability assessments. Any significant change in the quality or availability of industry resources will likely affect ERO resource requirements.

General

External factors will continue to affect both resource needs and allocation. These factors will likely include, but not be limited to:

- FERC orders, directives, audits, and performance assessment
- The final definition of the BES, as well as the number of exception requests
- The rate of entity violations
- The assessment of the impact of new technologies
- Proposed and actual changes in applicable laws and regulations, including environmental and others

The activities of the transmission, generator and other forums are expected to compliment ERO activities and place downward pressure on the need to add incremental resources which might otherwise be required in the absence of these forums.

NERC and the Regional Entities expect gains in efficiency, year-upon-year, as programs and initiatives mature, experience is gained, standards are improved and internal process and performance improvements are achieved.

Key Assumptions by Program Area

Reliability Standards Program

1. While NERC standards development has historically been managed on a “projects” basis, experience has shown that increased project management discipline is necessary to satisfy standards development goals and priorities, including the assurance of a requisite level of quality. Examples of efforts to increase project management discipline during the planning period include but are not necessarily limited to:

- a. Specific timeframes for standards process milestones;
 - b. Increased industry resource dedication over shorter periods; and
 - c. Clear criteria for cancellation of projects that have not yielded timely results.
2. NERC will need to allocate additional resources to support improvements in the quality of standards development and guidance, including related training activities.
 3. Review and modifications to the standards process may impact resources within the standards program area. Significant increases in standards processing may create additional resource needs to review and comment on proposed standards, support regulatory filings and oversee new standards as they become effective. However, any incremental resource needs are expected to be offset by improvements in the efficiency of the standards development process.
 4. Implementing a cost effectiveness analysis or assessment of proposed standards is likely to impact resource requirements, but the extent of the impact cannot be fully assessed at this time.
 5. The number of interpretation and guidance requests is expected to decrease over time, reflecting the impact of the results-based standards initiative and improved standards development process.
 6. The number of projects contained in the Reliability Standards Development Plan is expected to increase over the planning period. However, the scope of these projects is generally expected to be narrower than would otherwise exist in the absence of the results-based standards initiative.
 7. Activity associated with regional standards development is expected to decrease, together with staffing resources supporting this area.
 8. Improvements in the quality of standards drafting and implementation should result in improvements in the efficiency and effectiveness of auditing and enforcement activities towards the end of the planning period.
 9. NERC will increase the quality and effectiveness of regulatory filings. Efforts will include but not necessarily be limited to:
 - i. Greater use of pre-filing meetings which will include opportunities for regional and stakeholder participation;
 - ii. Greater dialogue with regulatory authorities regarding the form and requirements for regulatory filings, including reducing the requirement for exhibits by instead relying on publicly available documentation on NERC's website; and
 - iii. Seeking engagement with regulatory authorities to obtain formal regulatory authority input during standards development.

Compliance Monitoring and Enforcement and Organization Registration and Certification Program

Compliance and Enforcement

1. NERC and Regional Entities will have sufficient staff, supervision, and technical specialists with adequate collective professional competence and other resources, as needed, to perform the compliance work and to meet expected time frames for completing the work.
2. Staffing resources required for compliance and enforcement activities at NERC, are expected to be flat during the planning period; if minor resource additions are required, they will be offset by operating efficiencies in other areas.
3. Staffing resources required for compliance and enforcement activities at the Regional Entities over the planning period will vary based on regional needs and circumstances, with any increases generally expected to be mitigated through operating efficiencies in other areas.
4. Resource implications associated with the Find, Fix and Track (FFT) process are unclear at this time given the nascent state of the program. However, efficiency gains are expected as the program matures.
5. Results of implementation of the FFT process over the planning period will lead to continued refinement, improvement and prioritization of risk based compliance monitoring efforts.
6. Prospective entity impact evaluations will be accomplished using existing resources. Entity impact evaluations were previously titled entity risk assessments but have been changed based on continuing work with industry to further refine this topic.
7. Changes in TFE processing, including equipment class-based exceptions, audit sampling, and elimination of much of the reporting and review burden, must be implemented to improve efficiency.
8. The future use of spots checks will increase as risk-based monitoring is rolled out, but is not expected to affect overall resource requirements.
9. Improvements in consistency among the Regional Entities may facilitate more efficient resource allocation within the compliance and enforcement areas at NERC, as well as potentially reduce compliance costs for some registered entities.
10. Improvements in audit guidance may increase ERO efficiency, support improvements to resource allocation and help mitigate overall compliance costs.
11. Improvements in consistency among Regional Entities, and registered entities is expected from an improved centralized compliance, registration, and analysis and tracking system. A significant multiyear investment will be required to develop and implement the system.

12. As risk-based monitoring activities increase, strong consideration will be given to modifying the current three (3) and six (6) year audit cycles for registered entities. Changes to the three year audit cycle requirement for certified functions will require a change to the Rules of Procedure. The rigor, scope, depth and recurrence of audits and spot checks will be driven by reliability risk and not a predetermined schedule. As standards are improved, the need for clarifying documents, such as Compliance Application Notices (CANs) or interpretations, should decrease. Until the standards have been improved, CAN and interpretation activity is anticipated to occur at current levels.
13. The number of non-CIP violations discovered in 2011 is expected to decrease as most registered entities have now been audited at least once and the standards and their application has matured. The number of CIP violations is not expected to decrease and may increase over the planning period until all entities have undergone a CIP audit and until a measure of stability in the standards is reached.
14. Integration of the assessment of registered entity internal controls programs as part of the compliance monitoring program will allow NERC and the Regional Entities to further prioritize risk-based compliance monitoring activities. Greater emphasis on internal controls provide positive incentives for industry to demonstrative effective management of compliance programs that are focused on reliability, as well as place downward pressure on compliance resource requirements for both industry, NERC and the Regional Entities.
15. Further auditing efficiencies can be achieved by continued refinement of auditing procedures focused on the purpose, intent and reliability risk associated with applicable standards as well as the assessment of evidence.

Organization Registration and Certification

1. Implementation of the BES definition may place additional resource demands in the Registration area but the significance cannot be fully assessed at this time. If a high number of BES exceptions are requested, the potential for a backlog situation in the first years of implementation is possible.

Reliability Assessment and Performance Analysis Program

1. Implementation of a BES exception process is expected to impact resources requirements in this program area, but the significance of the impact cannot be fully assessed at this time, as resource requirements will be driven by the number of exception requests received. It's also expected that there may be resource impacts at the Regional Entity level. More information regarding these potential impacts will be addressed in the first draft of the NERC and Regional Entities' Business Plans and Budgets.
2. Investments will be needed to develop and implement improved data collection and analysis systems and capabilities and should improve overall ERO resource allocation and efficiency in the long term.

3. Resource impacts associated with new technologies and environmental regulations are uncertain at this point.
4. Implementation of an outcome based approach to achieve measureable improvements in reliability will likely require allocation of resources to this program area, the significance of which from an overall budget perspective cannot be determined at this time.

Training, Education, and Operator Certification Program

1. Both NERC and the Regional Entities agree that there are opportunities for improvements in the coordination, content and manner of internal and external training programs.
2. While additional or different resources will be required for certain training initiatives, it is not clear at this time whether these needs will translate into a significant increase in NERC's or any of the Regional Entities' budgets. The general sense at this point is that improvements with minimal budgetary impact can be achieved through better coordination, planning and management of training programs. The possible exception is in the area of additional resources need to support CEA staff auditor training, as further discussed below.
3. Implementation of auditor credentialing may result in resource impacts due to time period required to obtain necessary credentials.

Situation Awareness and Event Analysis Program

- NERC will restructure this program area by merging the Situation Awareness function into the Event Analysis department and include the ES-ISAC within the CIP department for budgeting purposes. NERC will budget and manage Event Analysis separately from the Compliance and Enforcement functions. NERC will budget the ES-ISAC as part of its CIP department.
- NERC will propose amendments to the Rules of Procedure to reflect this reorganization.
- NERC will cease providing contracted funding support for GPA and the NASPI initiative at the end of 2013.
- NERC will cease funding the IDC at the conclusion of its existing contract in March 2013.
- NERC will continue to review the appropriateness of continued funding of other reliability tools, with any proposed changes thereto subject to review and input from the Regional Entities, appropriate NERC committees and working groups, and other affected parties.
- SAFNR will provide additional situational awareness capabilities at both NERC and Regional Entity levels. Significant additional resource investments are not anticipated to be necessary for the Regional Entities to utilize SAFNR. NERC will continue to budget and incur costs to operate and maintain SAFNR.

- The number of “system occurrences” are expected to increase based on recent trends. However, it is unclear whether this increase will lead to an increase in the number of “qualified system events” requiring more detailed analysis.³³

Critical Infrastructure Protection

1. NERC will need to increase CIP resource support for auditor training and credentialing, as well as compliance enforcement activities. The increased support will likely be in retaining outside experts to train/credential NERC and Regional staff as opposed to increasing the size of NERC staff.
2. The ES-ISAC will be budgeted as part of the CIP department.
3. NERC will continue to conduct and budget grid security exercises.

Information Technology

1. Significant investments will be required over the planning period to develop and implement program area and enterprise wide applications to support business needs, including compliance, registration and tracking systems and other project, data management and analysis tools to provide greater cost efficiency and uniformity across the ERO. NERC and the Regional Entities have put in place a framework to define business requirements, establish priorities, and define and manage resource requirements associated with ERO IT investments over the planning period. NERC has also established a more rigorous and coordinated program for assessing its own internal IT needs. Further information regarding these frameworks, as well as preliminary projected resource requirements over the planning period, will be included in NERC’s draft 2013 Business Plan and Budget.
2. Ongoing investments will be required to develop, implement and maintain enhancements to the NERC and Regional Entity websites.

Finance and Administrative

1. It’s too early to predict any potential additional resource requirements associated with the implementation of the ERO Risk Management framework, however monies were budgeted for this activity in 2012 and expenditures and resource requirements will at least be at that level. Regional Entities do not anticipate increased resource requirements due to this effort.
2. NERC and the Regional Entities will work cooperatively to reduce overall operating expenses, focusing on opportunities to further reduce and/or improve the efficiency of travel, meeting, conference call, software licensing and hardware purchases, and

³³ The phrase “system occurrences” means events submitted and tracked that do not meet the ERO event analysis process categorization criteria (Category 1-5). Occurrence also include copper theft, substation intrusions and other occurrences on the bulk electric system which may be reported. The phrase “qualified system events” means events affecting the Bulk Electric System which meet the ERO event analysis process categorization criteria (Category 1-5).

insurance costs. Efforts will be made to improve the transparency of information regarding these categories of costs as part of the annual business plan and budget process.

3. NERC and the Regional Entities will work to improve budgeting and forecasting capabilities, as well as variance reporting.
4. NERC and the Regional Entities will work cooperatively to establish a common set of principles regarding the determination of working capital and contingency reserve requirements. However, working capital requirements will continue to be established on an entity by entity basis, with the requirements clearly set forth in and subject to review and approval as part of the annual business plan and budget process at the Regional Entity and NERC level.

Program	Consultants & Contracts	INC (DEC) OVER	
		2013 BUDGET	2012
Situation Awareness	Synchro Phasor (NASPI)	700,000	-
		110,000	110,000
	Resource Adequacy (ACE Frequency) Tool	80,000	-
	Inadvertent Interchange (Srv. Agreement)	35,000	-
	AIE Monitoring (Srv. Agreement)	35,000	-
	Frequency Monitoring and Analysis Tool (FMA)	45,000	45,000
	Intelligent Alarms/DARA (Srv. Agreement)	55,000	-
	Secure Alerting System	150,000	2,180
	Secure Alerting System Help Desk		(92,386)
	Secure Alert Change Management	50,000	-
	SAFNR - Phase II	725,500	251,904
	Total Situation Awareness (excluding IDC and Frame Relay)	1,985,500	316,698
			-
Critical Infrastructure	Cyber Risk Preparedness Assessment	150,000	60,000
	NIST/DOE Risk Guidelines		(25,000)
	ESCC Support	130,000	-
	GridEx Support	200,000	200,000
	ES-ISAC		
	ES-ISAC secure portal platform and annual hosting for communications systems	90,000	(160,000)
	Secure connection to US-CERT for bi-directional information sharing	25,000	(25,000)
			(250,000)
	Technical assistance to prepare and deliver Aurora Webinars	15,000	15,000
	Analytic capabilities	60,000	60,000
	Baseline Patterns and Analysis	30,000	30,000
	Integration Support Services for the the Wall of Knowledge	55,000	55,000
	ES-ISAC Members Conference	30,000	30,000
	TOTAL ES-ISAC	305,000	(245,000)
	Total Critical Infrastructure Department	785,000	(10,000)

Program	Consultants & Contracts	INC (DEC) OVER	
		2013 BUDGET	2012
Operator Certification	System Operator Testing Expenses 2011 1,025 @ \$70)	63,124	(8,626)
	System Operator Examination Development	113,690	25,454
	Examination Analysis (750 exams@\$17 per exam)	13,600	850
	System Operator Certification and Continuing Education Database		
	Database Development	20,000	(20,000)
	Database Maintenance	12,330	474
	SOCCEd Database Improvement Project (funded from Working Capital generated from fees in excess of expenses)	250,000	250,000
	Total Operator Certification	472,744	248,152
Training & Education	Continuing Education Program		
	Individual Learning Activity Reviewers	120,000	20,000
	Database Development	20,000	(20,000)
	Database Maintenance	12,330	474
	Web-based course hosting (Learning Management System)	26,500	(73,500)
	Web-based course development		(120,000)
	standards applications for industry, CEA staff	43,750	43,750
	risk assessment training for CEA staff, industry	20,000	20,000
	human performance fundamentals for staff, industry	43,750	43,750
	BPS events lessons learned for industry	12,500	12,500
	Training Services-NERC and Regional Entities		
	Regional Entity and NERC Auditor staff communications training	20,000	20,000
	Regional Entity and NERC Auditor certification training	27,000	27,000
	Training Services-NERC Staff Only Technical Training		
	NERC Staff BPS system training	30,000	30,000
	Total CE, Training & Education	375,830	3,974
	Total Training, Education and Operator Certification	848,574	252,126
Government Relations	External Affairs	150,000	150,000
	Total Government Relations	150,000	150,000
Legal and Regulatory	External Affairs	-	(141,750)
	Total Legal	-	(141,750)

Program	Consultants & Contracts	INC (DEC) OVER	
		2013 BUDGET	2012
			-
Information Technology	NERC Website Re-Design	175,000	75,000
	Security vulnerability testing of NERC website & network	200,000	-
	ERO Membership Service Agreement (Maintenance during re-write in 2013)	24,000	-
	NERC My Account Service Agreement (Maintenance during re-write in 2013)	30,000	-
		42,000	-
	Infrastructure Integration and Design	300,000	(200,000)
	Meeting Manager (Not implemented due to move to SharePoint)		(5,000)
	Compliance Database/IT Tools (CRATS)	250,000	(25,000)
	Compliance Database -(CITS/CUG)		(50,000)
	Guidance Database Development-User Guided Content	50,000	(25,000)
	Standards Balloting-Upgrade		(75,000)
	Standards Balloting Maintenance	20,000	(22,000)
	Contractor Project Manager	100,000	100,000
	Contractor Business Analyst	100,000	100,000
	Contract programming & development support	100,000	100,000
	Maintenance / Change Management - ERO Applications	250,000	250,000
	Outsourced Quality Assurance tester	50,000	50,000
	Data Warehouse design	250,000	250,000
	Common ERO technology platform - (SharePoint / Other)	500,000	500,000
	Studies & Assessments	100,000	100,000
	Disaster Recovery	150,000	150,000
	Iron Mountain Laptop Backup	30,000	30,000
		2,721,000	1,303,000
Human Resources	Executive Training and Development		-
	Strategic consulting on Risk-based, risk-avoidance compliance approach	75,000	-
	Collaboration and team-building leadership training	15,000	(10,000)
	Instruction Technologists-Staff Development		(90,000)
	Online Training	40,000	40,000
	NERC Staff Project Management training	12,000	12,000
	NERC Staff Communications skills (presentations and writing)	17,000	17,000
	NERC Staff IT applications training	17,000	17,000
	NERC Staff developmental training	20,000	20,000
	Executive Recruiting (Budget \$100k 2013 - 2015 in Personnel Expenses)		(100,000)
	Compensation Consulting	30,000	30,000
	Employee, industry and Board Surveys, succession planning	35,000	35,000
	HR Process Improvements		
	Single sign-on employee self-service	20,000	20,000
	Paperless HR	7,500	7,500
		288,500	(1,500)

Exhibit B – 2013 Contractor and Consultant Budget Detail

Program	Consultants & Contracts	INC (DEC) OVER	
		2013 BUDGET	2012
Finance and Accounting	Risk Management	205,000	(120,000)
	Assessment of CIP Auditing Practices and reports (Budgeted in Finance)	60,000	60,000
	Assessment of operations and planning standards Audits: Procedures, Practices, Tools and reports and reports (Budgeted in Finance)	60,000	60,000
		325,000	-
Situation Awareness	Contract - IDC		
	IDC Billing (46000)		
	IDC Base Contract	367,200	(1,095,220)
	Generation-to-Load Reporting (CO-283)	40,170	40,170
	Incentive availability performance	11,016	11,016
	NERC Factor Viewer	4,500	(13,500)
	SDX Maintenance (2010 - using on CO-283)	15,000	(45,000)
	SDX 2010 Deferred Change Orders		
	DF Support Services Agreement.	12,500	(37,500)
	Book of Flowgate Database	7,200	(21,600)
	Book of Flowgate Database-Maintenance (2010 - using on CO-283)		
	Contracts - IDC Total	457,586	(1,161,634)
Situation Awareness	Frame Relay Billing (46100)		
	Frame Relay-RC's	300,094	
	Contracts - Total Frame Relay	300,094	-
	TOTAL CONSULTANTS, CONTRACTS, IDC AND FRAME RELAY	8,816,254	528,940

Exhibit C - Working Capital and Operating Reserve Policy

This policy governs the determination of the company's annual working capital and operating reserve requirements and the authorization of management to access these funds.

The company's working capital requirement shall be the amount necessary to satisfy projected annual cash flow and cash balance requirements. Annual cash flow and cash balance requirements shall be determined based on a review of: (a) the company's projected cash flow needs over the applicable year and (b) cash balances required to satisfy any covenant under the terms of any loan, credit or other agreement to which the company is a party. To the extent that during the year the cash balances required to satisfy covenant obligations under the terms of any loan, credit or other agreement are reduced, such excess cash balance will be transferred to the company's operating reserve for unforeseen contingencies described below.

The company's operating reserves shall include: (1) an amount necessary to satisfy known contingencies where the specific timing and amount is uncertain, (2) an amount available to be utilized for unforeseen contingency, and (3) excess funds applicable to the Personnel Certification and Operator Training Program.

The amount of the company's working capital and operating reserves, by category, shall be separately identified and quantified each year in the business plan and budget submitted to and approved by the Board of Trustees. Transfers of working capital to operating reserves and transfers of operating reserve funds between categories shall require approval of the Board of Trustees, after review and recommendation by the Finance and Audit Committee.

The following guidelines shall apply to the determination of the company's operating reserves.

(1) Known Contingencies Where the Amount and Timing Are Uncertain

This category of operating reserves represents estimated funding reserves for known contingencies where the timing and amount of funding to satisfy the contingency when it materializes is uncertain. An example would be the need for additional resources to address a requirement or process where regulatory or other governmental authorizations or directives are pending or anticipated but an order has not yet been issued so the amount of the impact and timing is uncertain, but management has nevertheless concluded that additional resources are likely to be required.

(2) Unforeseen Contingencies

This category of operating reserves represents a funding reserve for unknown contingencies which were not anticipated at the time of preparation and approval of the business plan and budget. Examples of unforeseen contingencies might include supplemental resources required to assist in the evaluation of significant unforeseen events affecting the bulk power system, such as the February Cold Weather Event and Southwest Outage or to address unforeseen regulatory directives.

(3) Excess Funds applicable to the Personnel Certification and Operator Training Program

In the event the company realizes higher levels of funding from operator certification and training above incurred expenses, this excess funding shall constitute a separate category of operating reserve and shall be used solely for operator training and certification needs, as determined by the company and the Personnel Certification Governance Committee. This is consistent with the intent of Section 602.4.10 of the Rules of Procedures.

Guidelines and Authorities Applicable to Expenditures of Working Capital and Operating Reserves

The following guidelines, limitations and authorities shall apply to expenditures of working capital and operating reserves.

1. The Chief Financial and Administrative Officer shall have the authority to draw on budgeted working capital reserves to the extent necessary to satisfy daily cash flow requirements. Any such draws of working capital reserves shall to the extent possible be promptly replenished from future excess cash flow.
2. For expenditures of operating reserves for budgeted known contingencies, the company's president and chief executive officer is authorized to expend such reserves up to the amount set forth in the company's budget.
3. For budgeted expenditures of excess funds associated with the Personnel Certification and Operator Training Program, the company's president and chief executive officer is authorized to expend such reserves up to the amount set forth in the company's budget.
4. For expenditure of operating reserves budgeted for unforeseen contingencies and for unbudgeted expenditures of excess funds associated with the Personnel Certification and Operator Training Program:
 - i. The president and chief executive officer shall have authority to make expenditures up to \$250,000;
 - ii. For expenditures greater than \$250,000 but less than \$500,000 prior approval of the Finance and Audit Committee is required; and
 - iii. For expenditures in excess of \$500,000 approval of the Board of Trustees is required, after notice to and recommendation by the Finance and Audit Committee.
5. Any expenditure of funds in excess of the company's approved budget, inclusive of budgeted working capital and operating reserves, requires the prior approval of the Board of Trustees, after notice to and recommendation of the Finance and Audit Committee.

All expenditures of contingency funds are subject to other applicable company policies and procedures, including currently effective procurement policies and delegations of authority, and shall be separately reported in the budget variance reports prepared by management and

included in the quarterly Finance and Audit Committee agenda materials, which are posted on the company's website.

The procedures set forth in Section 1108 of the Rules of Procedure, including Board of Trustees and FERC approval, shall continue to apply in circumstances where the company requires funding between normal annual budget cycles in excess of amounts available through approved assessments, working capital and operating reserve resources.

Guidelines and Authorities Required to Reallocate Budgeted Expenditures on an Intra-year Basis

During the course of the year, events may unfold such that some approved budget areas may run below budget, making funds available to satisfy other resource needs based on changing priorities. In the event such under runs occur, these excess funds shall be added to the unforeseen contingency operating reserve and the president and chief executive officer shall have the authority to expend such funds, and management shall also be responsible for reporting such expenditures, in the same manner as the expenditure of funds for other unforeseen contingencies set forth above.

Addition of Unbudgeted FTE or Headcount Additions

Any FTE or headcount additions, regardless of the source of and availability of funding, which are in excess of the total FTEs or total headcount, respectively, set forth in the company's approved business plan and budget for the applicable budget year shall require approval of the Board of Trustees, after review by the Corporate Governance and Human Resources Committee and the Finance and Audit Committee.

Proposed 2013 Working Capital and Operating Reserve Amounts

Working Capital – \$0

Based upon its 2013 cash flow projection and taking into account the historic manner in which NERC's assessments have been billed and paid, including the fact that WECC collects and pays its annual allocated share of the NERC assessments during the 1st quarter of the year, NERC does not anticipate needing access to working capital in 2013 to meet monthly cash flow needs. In the unlikely event NERC experiences a temporary cash flow shortage it has the ability to either request authorization from the Finance and Audit Committee and Board of Trustees to temporarily access operating reserve funds or draw on its \$4M line of credit so long as NERC is in compliance with the covenants under its bank credit agreement.

NERC's credit agreement currently requires NERC to maintain a minimum of \$1.250M in net assets (total assets minus intangible assets minus total liabilities).

NERC has also posted letters of credit totaling approximately \$134,146 in lieu of cash security deposits in connection with its offices leases. In the event these lines of credit get drawn on, NERC is required to reimburse the draws in full. Management does not recommend at this time that working capital be maintained as security for this reimbursement obligation.

Operating Reserves – \$3.4M (Known Contingency Category-\$1.M + Unforeseen Contingency Category \$1M + Personnel Certification and Operating Training Excess Revenues \$1.4M)

Operating reserve amounts are divided into three categories: (1) known contingencies, (2) unknown contingencies and (3) excess revenues from the Personnel Certification and Operator Training Programs. Management's proposal with respect to the amount of 2013 reserves for each of these categories is set forth below.

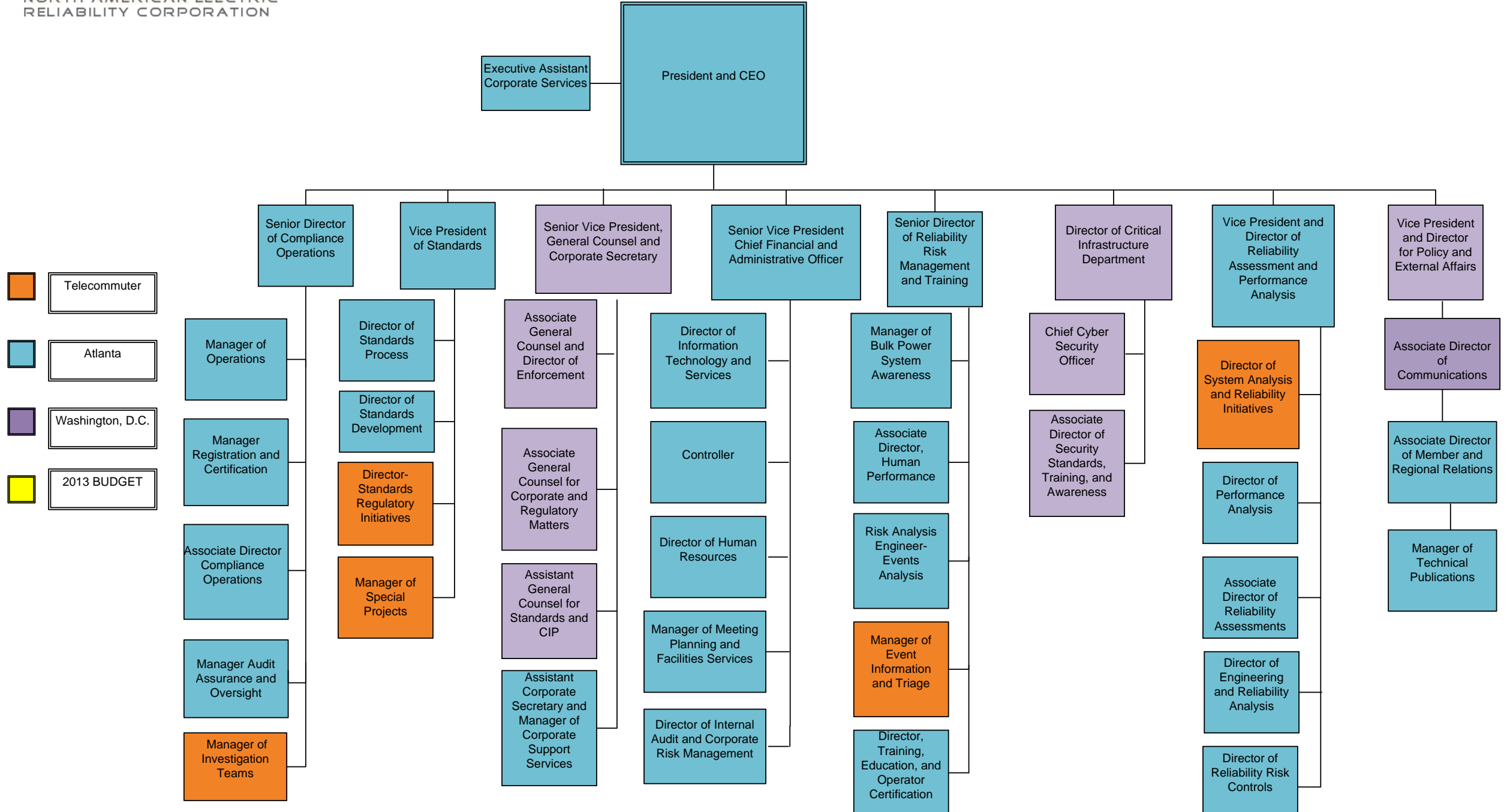
- (1) Known Contingencies where timing and amount uncertain³⁴ — \$1.0M representing a discount from the maximum aggregate estimated cost of \$2.5M for the following known contingencies:
 - a. BES implementation- Outside contractor (subject matter experts) support-\$0-\$300k. Software application for submittal, processing and management of exclusion requests. \$0-\$300k
 - i. NERC will be in a better position to develop a more informed forecast of this need after the FERC issues an order on the proposed definition of BES pending in FERC Docket RM12-6-000.
 - b. Implementation of NERC's revision to the Transmission Planning Reliability Standard, TPL-002-ob, Table 1, footnote b (FERC Docket No. RM11-18-000) — Outside contractor (subject matter expert) support — \$0-\$250k

³⁴ To the extent that proposed reserves in this category become unnecessary due, for example, the terms and conditions of a FERC order, pursuant to the proposed Working Capital and Operating Reserve Policy management could make a request to the NERC Finance and Audit Committee and Board of Trustees to set aside funds for other specific contingencies which became known after Board approval of the budget or request that all or a portion of the amount be transferred to the Unforeseen Contingencies category.

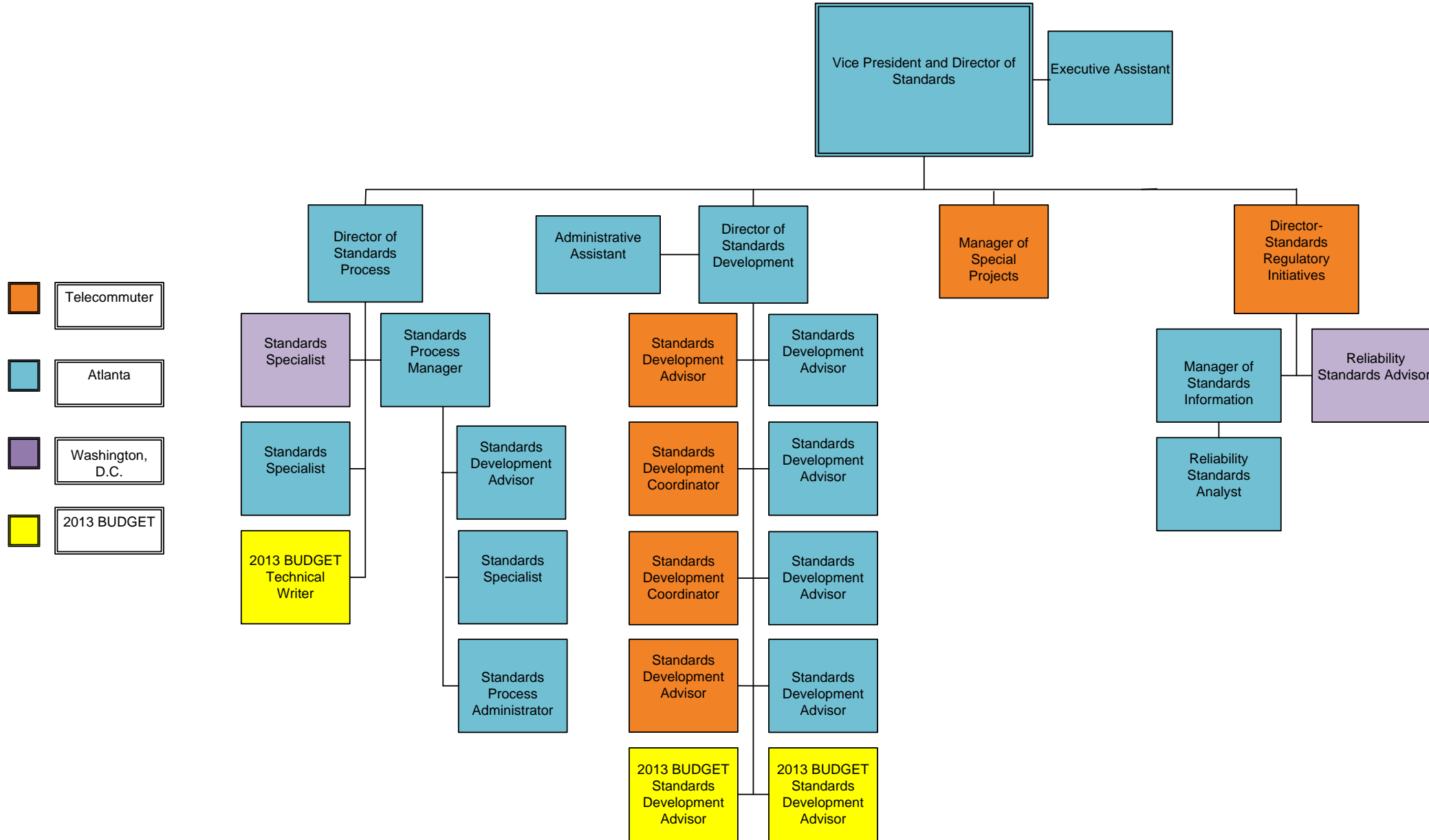
- i. NERC will be in a position to develop a more informed forecast of this need once the results of the NERC Rules of Procedure Section 1600 Data Request, regarding the use of Table 1, footnote b (i.e., planned load shed in the event of a single contingency) have been received and reviewed.
 - c. Events Information database to enable NERC and the Regional Entities to uniquely identify each event, track documentation, critical dates and status and provide for secure transfers of information between NERC and the Regional Entities — \$0-\$300k
 - d. Automated system to collect reliability assessment data used for RAPA BPS assessments, reducing administrative burdens associated with collection of 500,000 data points annually — \$0-\$200k
 - e. Generation protection and controls modeling support to the extent DOE funding is no longer available — \$0-\$50k
 - f. FERC audit implementation — \$0-\$1.0M
 - i. Compensation studies — \$0-\$200k
 - ii. Accounting system upgrades — \$0-\$500k
 - iii. Additional accounting staff — \$0-\$100k
 - iv. Other Consultants — \$0-\$200k
 - g. Additional CIP audit support, as well as audit support for CCC compliance audits, in excess of 2013 budgeted internal CIP resources and external audit budget under Risk Management under Finance and Accounting — \$0-\$100k
- (2) Unforeseen Contingencies — \$1M
- a. Represents a contingency for unknowns including significant litigation, compliance with new governmental or regulatory mandates, major system event investigations, etc.
- (3) System Operator Certification Program — \$1.4M
- a. In 2010 and 2011, the System Operator Testing and Certification Program generated \$1.4M in excess revenues over expenses
 - b. In 2012, the Program is projected to generate approximately \$321.3k in excess revenues over expenses
 - c. The 2013 budget includes a reduction of \$347k of the excess revenues over expenses generated between 2010 and 2012, to fund 2013 expenses for the System Operator Testing and Certification Program which are projected to be in excess of fees collected.

Total Working Capital + Operating Reserves – \$3.4M

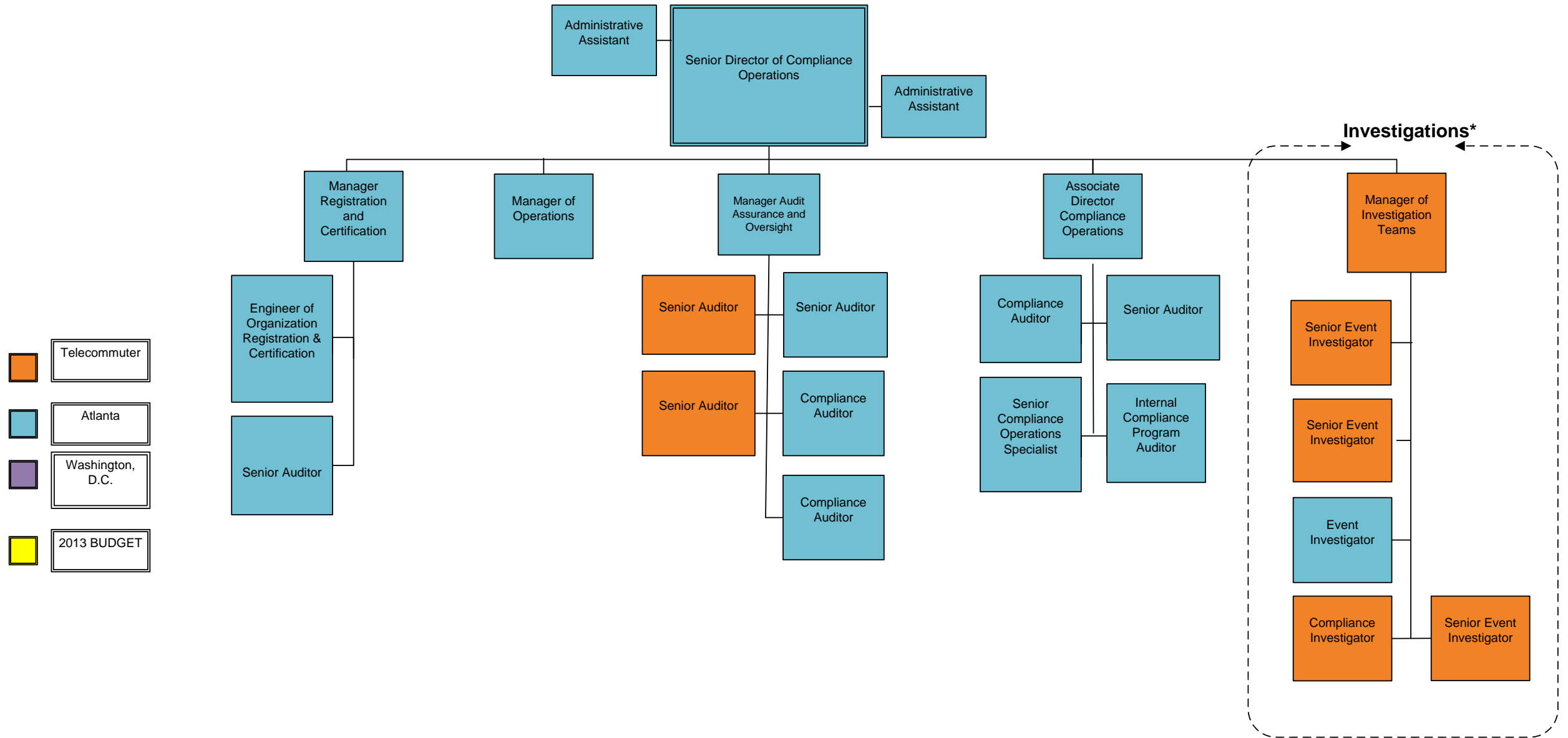
NERC Staff Organization Chart 2012 - 2013 Budget per Reorganizaton



Reliability Standards 2012 - 2013

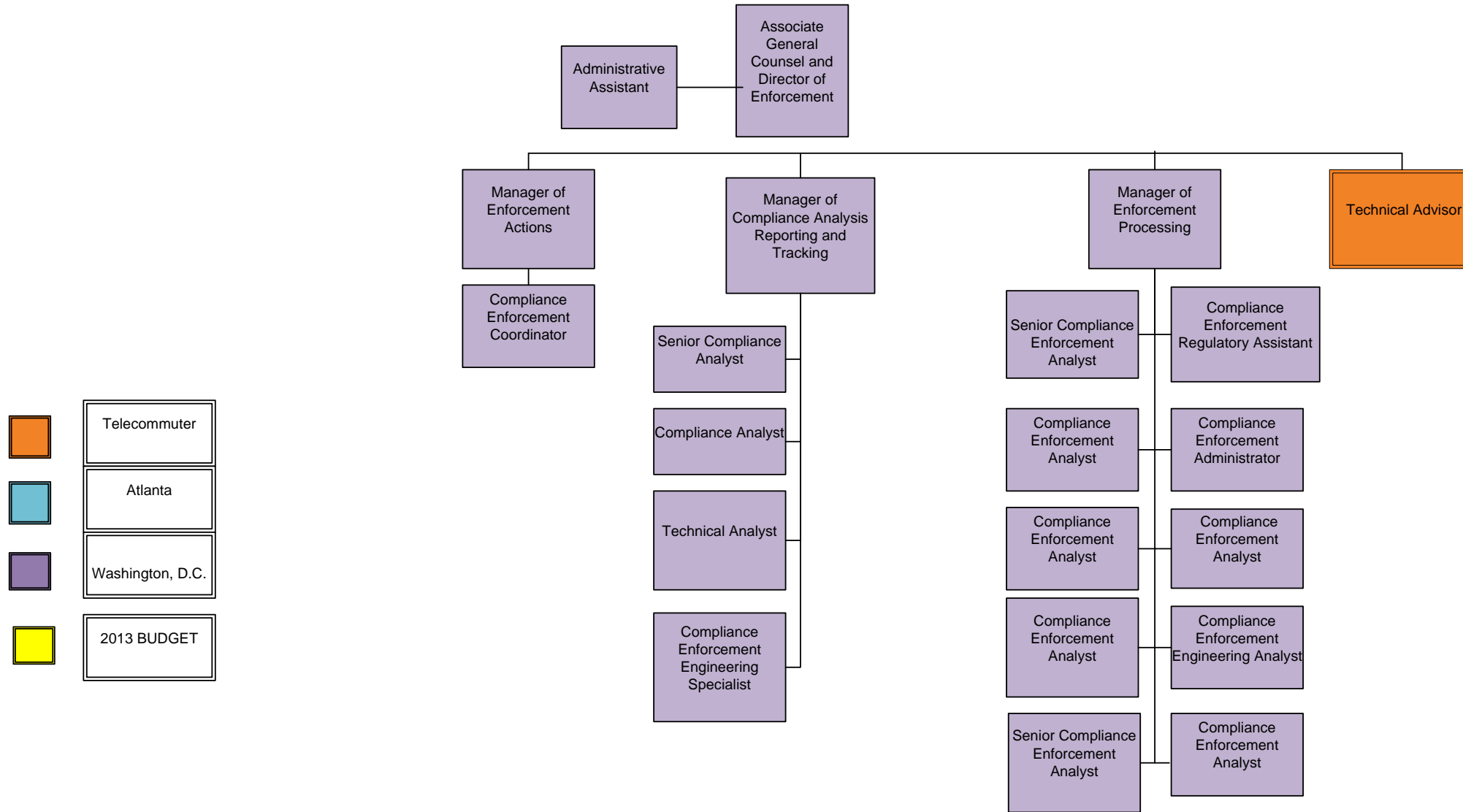


Compliance Operations 2012 - 2013

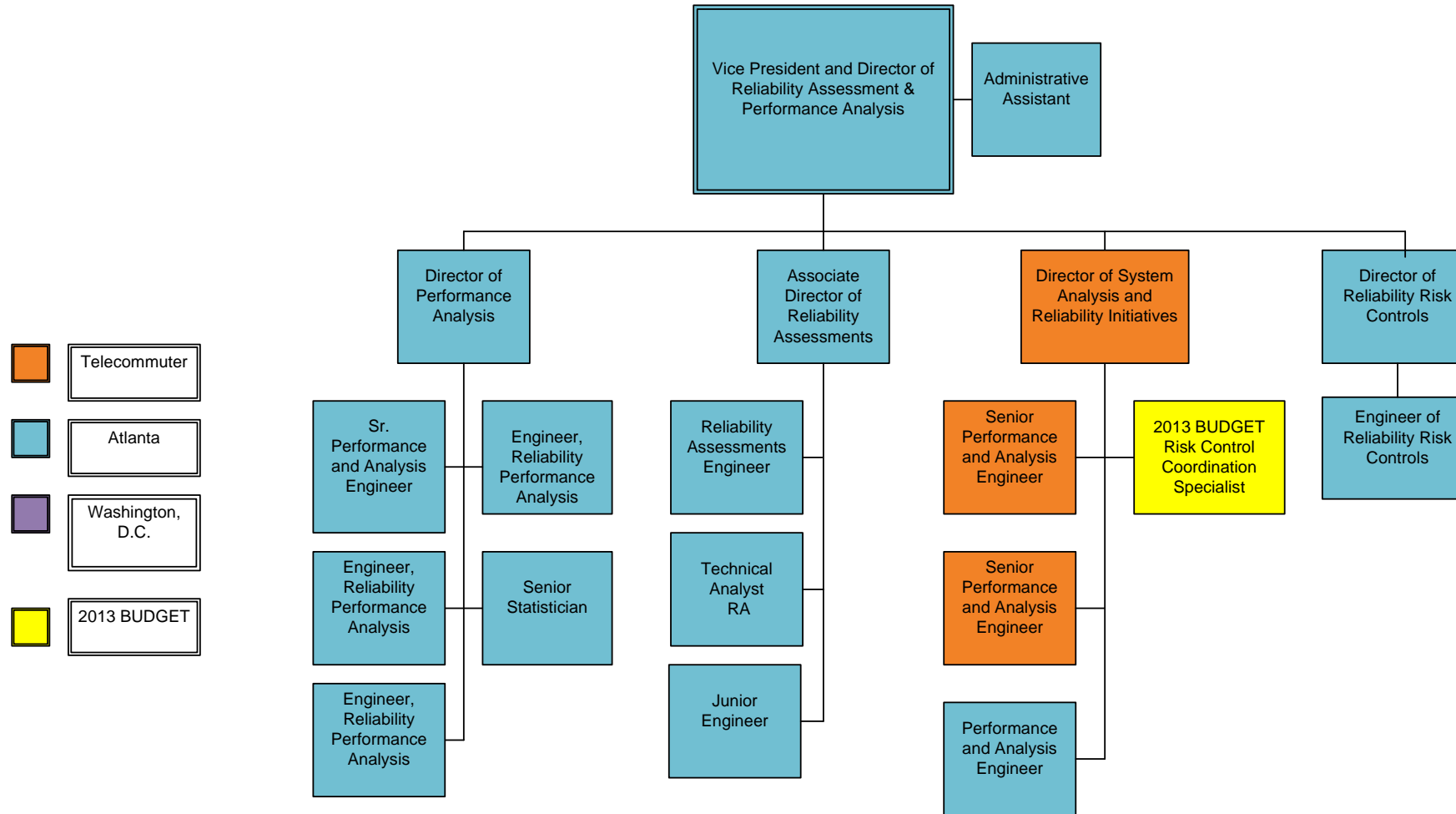


*Staff originally budgeted with Events Analysis and Investigations

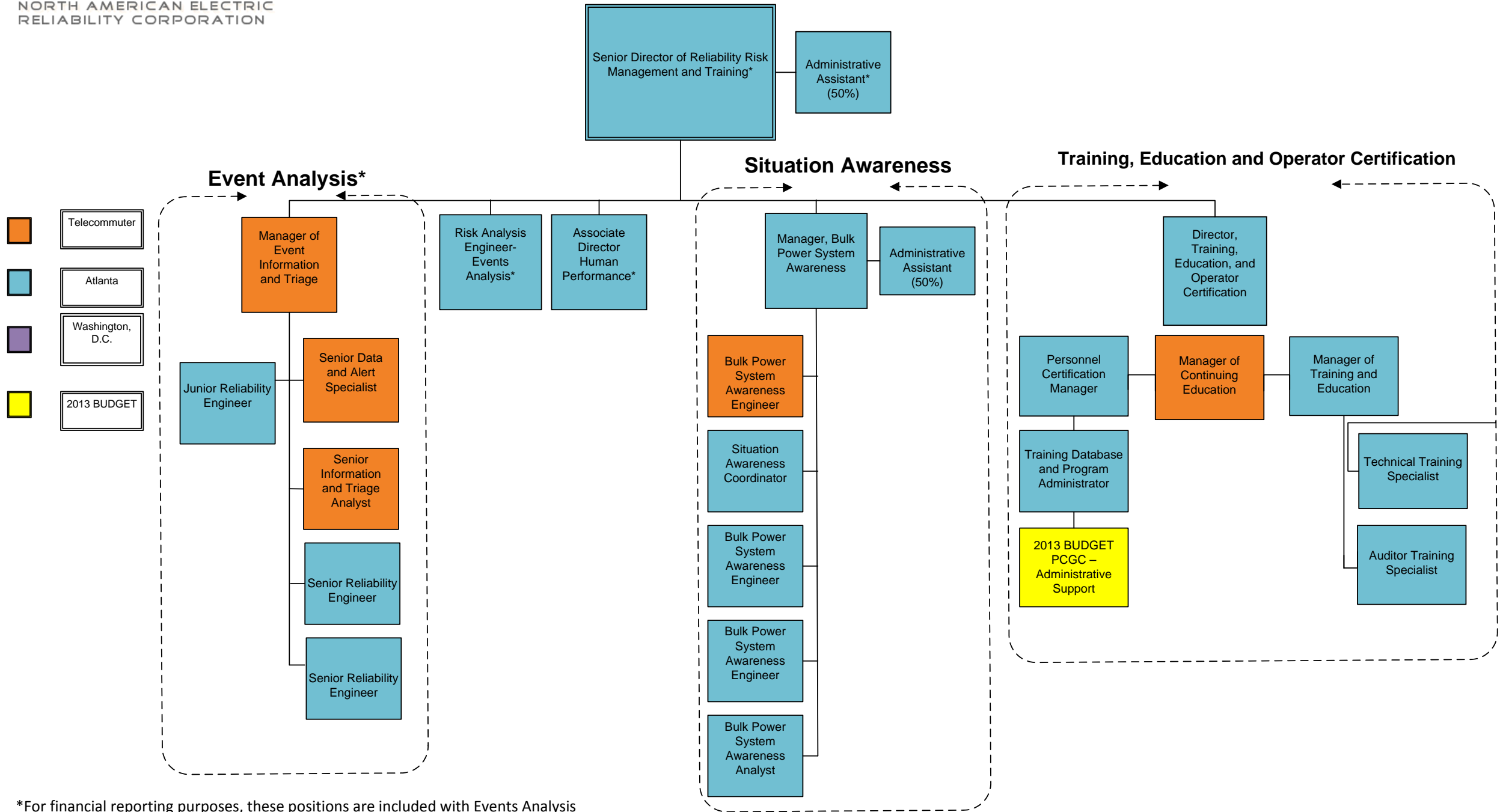
Compliance Enforcement 2012 - 2013



Reliability Assessment & Performance Analysis 2012-2013

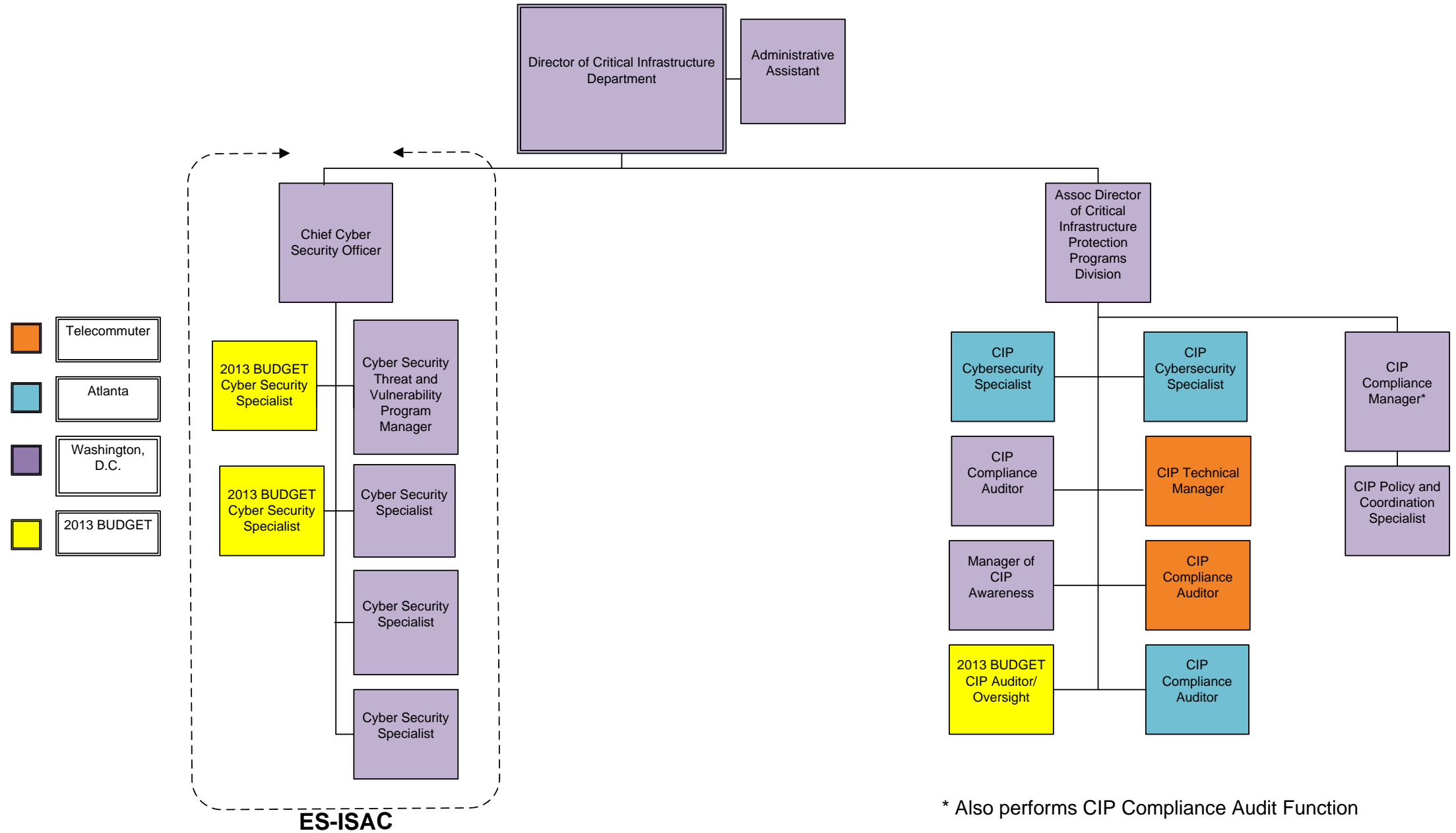


Reliability Risk Management 2012 - 2013

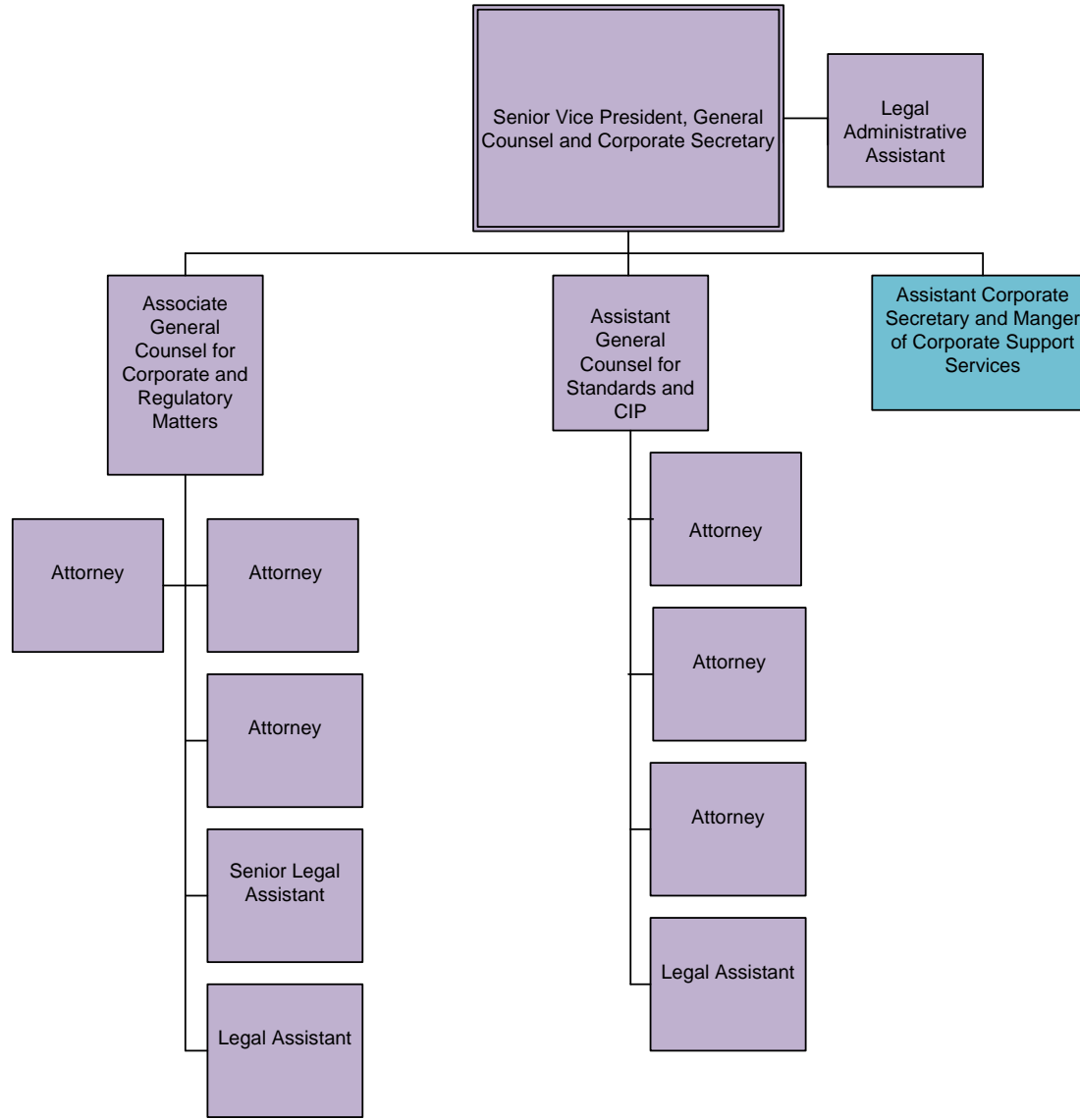


*For financial reporting purposes, these positions are included with Events Analysis

Critical Infrastructure Department 2012 - 2013

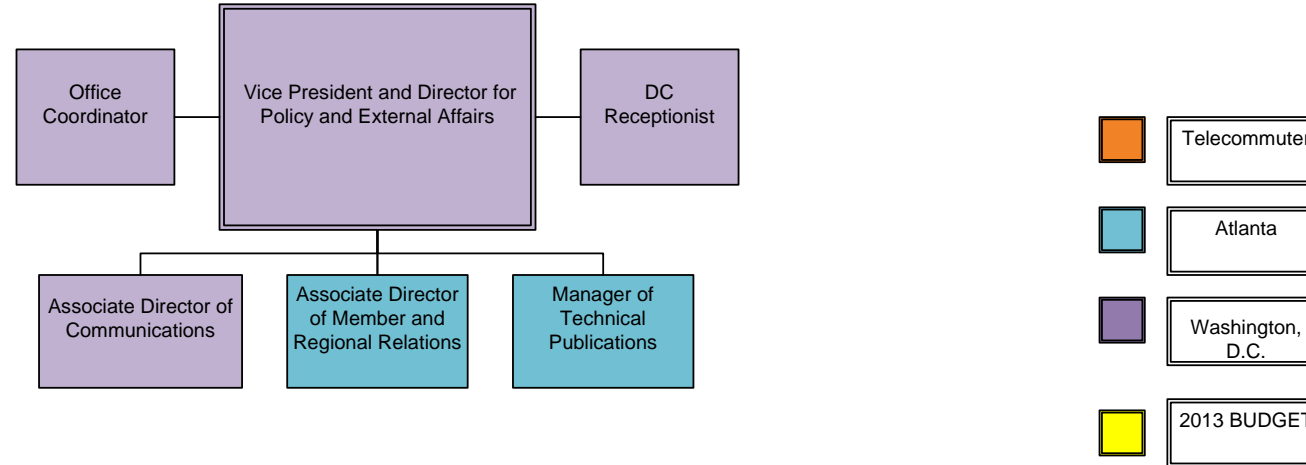


Legal and Regulatory 2012 - 2013

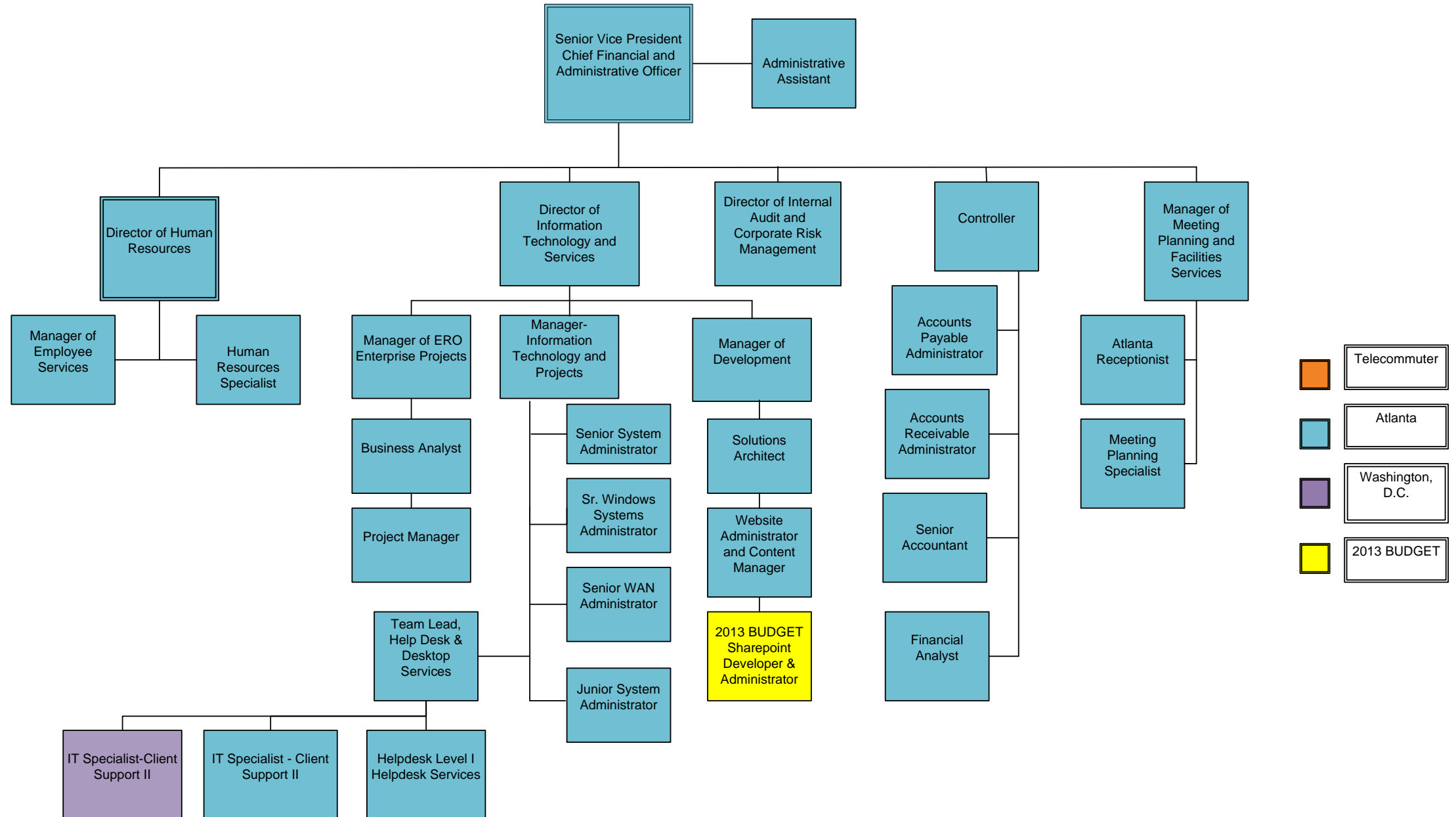


	Telecommuter
	Atlanta
	Washington, D.C.
	2013 BUDGET

Governmental Relations 2012 - 2013



Accounting and Finance, Information Technology and Human Resources 2012 - 2013



2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NEL (MWh)	U.S. NEL	Canada NEL	Mexico NEL	% of RE total	US Total	Canada Total	Mexico Total	% of ERO Total	US Total	Canada Total	Mexico Total	% of ERO - US Only
2011	FRCC	1074	Alachua, City of	U.S.	127,922	127,922			0.057%	0.057%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.003%
2011	FRCC	1075	Bartow, City of	U.S.	277,100	277,100			0.124%	0.124%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.007%
2011	FRCC	1076	Chattahoochee, City of	U.S.	41,040	41,040			0.018%	0.018%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	FRCC	1077	Florida Keys Electric Cooperative Assn	U.S.	699,000	699,000			0.312%	0.312%	0.000%	0.000%	0.015%	0.015%	0.000%	0.000%	0.017%
2011	FRCC	1078	Florida Power & Light Co.	U.S.	110,279,500	110,279,500			49.253%	49.253%	0.000%	0.000%	2.436%	2.436%	0.000%	0.000%	2.760%
2011	FRCC	1079	Florida Public Utilities Company	U.S.	405,000	405,000			0.181%	0.181%	0.000%	0.000%	0.009%	0.009%	0.000%	0.000%	0.010%
2011	FRCC	1080	Gainesville Regional Utilities	U.S.	1,822,179	1,822,179			0.814%	0.814%	0.000%	0.000%	0.040%	0.040%	0.000%	0.000%	0.046%
2011	FRCC	1081	Homestead, City of	U.S.	495,000	495,000			0.221%	0.221%	0.000%	0.000%	0.011%	0.011%	0.000%	0.000%	0.012%
2011	FRCC	1082	JEA	U.S.	12,575,000	12,575,000			5.616%	5.616%	0.000%	0.000%	0.278%	0.278%	0.000%	0.000%	0.315%
2011	FRCC	1083	Lakeland Electric	U.S.	2,893,000	2,893,000			1.292%	1.292%	0.000%	0.000%	0.064%	0.064%	0.000%	0.000%	0.072%
2011	FRCC	1626	Lee County Electric Cooperative, Inc	U.S.	1,177,900	1,177,900			0.526%	0.526%	0.000%	0.000%	0.026%	0.026%	0.000%	0.000%	0.029%
2011	FRCC	1084	Mount Dora, City of	U.S.	90,700	90,700			0.041%	0.041%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	FRCC	1085	New Smyrna Beach, Utilities Commission of	U.S.	387,000	387,000			0.173%	0.173%	0.000%	0.000%	0.009%	0.009%	0.000%	0.000%	0.010%
2011	FRCC	1086	Orlando Utilities Commission	U.S.	5,654,900	5,654,900			2.526%	2.526%	0.000%	0.000%	0.125%	0.125%	0.000%	0.000%	0.142%
2011	FRCC	1087	Progress Energy Florida	U.S.	40,039,700	40,039,700			17.883%	17.883%	0.000%	0.000%	0.885%	0.885%	0.000%	0.000%	1.002%
2011	FRCC	1088	Quincy, City of	U.S.	142,900	142,900			0.064%	0.064%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.004%
2011	FRCC	1089	Reedy Creek Improvement District	U.S.	1,208,000	1,208,000			0.540%	0.540%	0.000%	0.000%	0.027%	0.027%	0.000%	0.000%	0.030%
2011	FRCC	1090	St. Cloud, City of (OUC)	U.S.	590,000	590,000			0.264%	0.264%	0.000%	0.000%	0.013%	0.013%	0.000%	0.000%	0.015%
2011	FRCC	1091	Tallahassee, City of	U.S.	2,799,000	2,799,000			1.250%	1.250%	0.000%	0.000%	0.062%	0.062%	0.000%	0.000%	0.070%
2011	FRCC	1092	Tampa Electric Company	U.S.	19,205,600	19,205,600			8.578%	8.578%	0.000%	0.000%	0.424%	0.424%	0.000%	0.000%	0.481%
2011	FRCC	1603	City of Vero Beach	U.S.	741,000	741,000			0.331%	0.331%	0.000%	0.000%	0.016%	0.016%	0.000%	0.000%	0.019%
2011	FRCC	1093	Wauchula, City of	U.S.	63,000	63,000			0.028%	0.028%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.002%
2011	FRCC	1094	Williston, City of	U.S.	33,165	33,165			0.015%	0.015%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	FRCC	1095	Winter Park, City of	U.S.	442,300	442,300			0.198%	0.198%	0.000%	0.000%	0.010%	0.010%	0.000%	0.000%	0.011%
2011	FRCC	1072	Florida Municipal Power Agency	U.S.	6,022,040	6,022,040			2.690%	2.690%	0.000%	0.000%	0.133%	0.133%	0.000%	0.000%	0.151%
2011	FRCC	1073	Seminole Electric Cooperative	U.S.	15,689,986	15,689,986			7.008%	7.008%	0.000%	0.000%	0.347%	0.347%	0.000%	0.000%	0.393%
TOTAL FRCC					223,901,932	223,901,932	-	-	100.000%	100.000%	0.000%	0.000%	4.946%	4.946%	0.000%	0.000%	5.603%
2011	MRO	1199	Basin Electric Power Cooperative	U.S.	12,876,292	12,876,292	-	-	4.551%	4.551%	0.000%	0.000%	0.284%	0.284%	0.000%	0.000%	0.322%
2011	MRO	1201	Central Iowa Power Cooperative (CIPCO)	U.S.	2,792,947	2,792,947	-	-	0.987%	0.987%	0.000%	0.000%	0.062%	0.062%	0.000%	0.000%	0.070%
2011	MRO	1204	Corn Belt Power Cooperative	U.S.	1,771,700	1,771,700	-	-	0.626%	0.626%	0.000%	0.000%	0.039%	0.039%	0.000%	0.000%	0.044%
2011	MRO	1207	Dairyland Power Cooperative	U.S.	5,260,600	5,260,600	-	-	1.859%	1.859%	0.000%	0.000%	0.116%	0.116%	0.000%	0.000%	0.132%
2011	MRO	1210	Great River Energy	U.S.	13,485,724	13,485,724	-	-	4.766%	4.766%	0.000%	0.000%	0.298%	0.298%	0.000%	0.000%	0.337%
2011	MRO	1222	Minnkota Power Cooperative, Inc.	U.S.	4,041,580	4,041,580	-	-	1.428%	1.428%	0.000%	0.000%	0.089%	0.089%	0.000%	0.000%	0.101%
2011	MRO	1230	Nebraska Public Power District	U.S.	12,792,317	12,792,317	-	-	4.521%	4.521%	0.000%	0.000%	0.283%	0.283%	0.000%	0.000%	0.320%
2011	MRO	1232	Omaha Public Power District	U.S.	11,294,498	11,294,498	-	-	3.992%	3.992%	0.000%	0.000%	0.250%	0.250%	0.000%	0.000%	0.283%
2011	MRO	1237	Southern Montana Generation and Transmission	U.S.	4,101	4,101	-	-	0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	MRO	1240	Western Area Power Administration (UM)	U.S.	8,979,222	8,979,222	-	-	3.173%	3.173%	0.000%	0.000%	0.198%	0.198%	0.000%	0.000%	0.225%
2011	MRO	1239	Western Area Power Administration (LM)	U.S.	126,885	126,885	-	-	0.045%	0.045%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.003%
2011	MRO	1217	Manitoba Hydro	CAN	22,687,015		22,687,015		8.018%	0.000%	8.018%	0.000%	0.501%	0.000%	0.501%	0.000%	0.000%
2011	MRO	1235	SaskPower	CAN	21,611,000		21,611,000		7.638%	0.000%	7.638%	0.000%	0.477%	0.000%	0.477%	0.000%	0.000%
2011	MRO	1195	Alliant Energy (Alliant East - WPL & Alliant West IPL)	U.S.	28,659,140	28,659,140	-	-	10.129%	10.129%	0.000%	0.000%	0.633%	0.633%	0.000%	0.000%	0.717%
2011	MRO	1216	Madison, Gas and Electric	U.S.	3,483,114	3,483,114	-	-	1.231%	1.231%	0.000%	0.000%	0.077%	0.077%	0.000%	0.000%	0.087%
2011	MRO	1220	MidAmerican Energy Company	U.S.	27,733,598	27,733,598	-	-	9.801%	9.801%	0.000%	0.000%	0.613%	0.613%	0.000%	0.000%	0.694%
2011	MRO	1221	Minnesota Power	U.S.	13,185,574	13,185,574	-	-	4.660%	4.660%	0.000%	0.000%	0.291%	0.291%	0.000%	0.000%	0.330%
2011	MRO	1226	Montana-Dakota Utilities Co.	U.S.	2,776,082	2,776,082	-	-	0.981%	0.981%	0.000%	0.000%	0.061%	0.061%	0.000%	0.000%	0.069%
2011	MRO	1231	NorthWestern Energy	U.S.	1,503,637	1,503,637	-	-	0.531%	0.531%	0.000%	0.000%	0.033%	0.033%	0.000%	0.000%	0.038%
2011	MRO	1233	Otter Tail Power Company	U.S.	4,340,620	4,340,620	-	-	1.534%	1.534%	0.000%	0.000%	0.096%	0.096%	0.000%	0.000%	0.109%
2011	MRO	1243	Integrus Energy Group (WPS and UPPCO)	U.S.	13,495,958	13,495,958	-	-	4.770%	4.770%	0.000%	0.000%	0.298%	0.298%	0.000%	0.000%	0.338%
2011	MRO	1244	Xcel Energy Company (NSP)	U.S.	46,149,635	46,149,635	-	-	16.310%	16.310%	0.000%	0.000%	1.020%	1.020%	0.000%	0.000%	1.155%
2011	MRO	1196	Ames Municipal Electric System	U.S.	776,022	776,022	-	-	0.274%	0.274%	0.000%	0.000%	0.017%	0.017%	0.000%	0.000%	0.019%
2011	MRO	1604	Atlantic Municipal Utilities	U.S.	70,850	70,850	-	-	0.025%	0.025%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	MRO	1476	Badger Power Marketing Authority of Wisconsin, In	U.S.	412,684	412,684	-	-	0.146%	0.146%	0.000%	0.000%	0.009%	0.009%	0.000%	0.000%	0.010%
2011	MRO	1200	Cedar Falls Municipal Utilities	U.S.	518,347	518,347	-	-	0.183%	0.183%	0.000%	0.000%	0.011%	0.011%	0.000%	0.000%	0.013%

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NEL (MWh)	U.S. NEL	Canada NEL	Mexico NEL	% of RE total	US Total	Canada Total	Mexico Total	% of ERO Total	US Total	Canada Total	Mexico Total	% of ERO - US Only
2011	MRO	1477	Central Minnesota Municipal Power Agency (CMMF)	U.S.	473,123	473,123	-		0.167%	0.167%	0.000%	0.000%	0.010%	0.010%	0.000%	0.000%	0.012%
2011	MRO	1605	City of Pella	U.S.	198,568	198,568	-		0.070%	0.070%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.005%
2011	MRO	1203	Escanaba Municipal Electric Utility	U.S.	152,753	152,753	-		0.054%	0.054%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.004%
2011	MRO	1205	Falls City Water & Light Department	U.S.	56,484	56,484	-		0.020%	0.020%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	MRO	1206	Fremont Department of Utilities	U.S.	439,487	439,487	-		0.155%	0.155%	0.000%	0.000%	0.010%	0.010%	0.000%	0.000%	0.011%
2011	MRO	1208	Geneseo Municipal Utilities	U.S.	67,256	67,256	-		0.024%	0.024%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.002%
2011	MRO	1209	Grand Island Utilities Department	U.S.	749,418	749,418	-		0.265%	0.265%	0.000%	0.000%	0.017%	0.017%	0.000%	0.000%	0.019%
2011	MRO	1606	Harlan Municipal Utilities	U.S.	24,145	24,145	-		0.009%	0.009%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	MRO	1211	Hastings Utilities	U.S.	430,025	430,025	-		0.152%	0.152%	0.000%	0.000%	0.009%	0.009%	0.000%	0.000%	0.011%
2011	MRO	1212	Heartland Consumers Power District	U.S.	851,022	851,022	-		0.301%	0.301%	0.000%	0.000%	0.019%	0.019%	0.000%	0.000%	0.021%
2011	MRO	1213	Hutchinson Utilities Commission	U.S.	302,337	302,337	-		0.107%	0.107%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.008%
2011	MRO	1215	Lincoln Electric System	U.S.	3,220,742	3,220,742	-		1.138%	1.138%	0.000%	0.000%	0.071%	0.071%	0.000%	0.000%	0.081%
2011	MRO	1218	Manitowoc Public Utilities	U.S.	537,247	537,247	-		0.190%	0.190%	0.000%	0.000%	0.012%	0.012%	0.000%	0.000%	0.013%
2011	MRO	1223	Missouri River Energy Services	U.S.	2,236,676	2,236,676	-		0.790%	0.790%	0.000%	0.000%	0.049%	0.049%	0.000%	0.000%	0.056%
2011	MRO	1224	MN Municipal Power Agency (MMPA)	U.S.	1,454,647	1,454,647	-		0.514%	0.514%	0.000%	0.000%	0.032%	0.032%	0.000%	0.000%	0.036%
2011	MRO	1607	Montezuma Municipal Light & Power	U.S.	35,057	35,057	-		0.012%	0.012%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	MRO	1227	Municipal Energy Agency of Nebraska	U.S.	1,161,634	1,161,634	-		0.411%	0.411%	0.000%	0.000%	0.026%	0.026%	0.000%	0.000%	0.029%
2011	MRO	1228	Muscatine Power and Water	U.S.	879,516	879,516	-		0.311%	0.311%	0.000%	0.000%	0.019%	0.019%	0.000%	0.000%	0.022%
2011	MRO	1229	Nebraska City Utilities	U.S.	175,634	175,634	-		0.062%	0.062%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.004%
2011	MRO	1234	Rochester Public Utilities	U.S.	8,902	8,902	-		0.003%	0.003%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	MRO	1236	Southern Minnesota Municipal Power Agency	U.S.	2,961,297	2,961,297	-		1.047%	1.047%	0.000%	0.000%	0.065%	0.065%	0.000%	0.000%	0.074%
2011	MRO	1241	Willmar Municipal Utilities	U.S.	266,050	266,050	-		0.094%	0.094%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.007%
2011	MRO	1242	Wisconsin Public Power, Inc. (East and West region)	U.S.	5,442,541	5,442,541	-		1.923%	1.923%	0.000%	0.000%	0.120%	0.120%	0.000%	0.000%	0.136%
TOTAL MRO					282,953,703	238,655,688	44,298,015	-	100.00%	84.344%	15.656%	0.000%	6.251%	5.272%	0.979%	0.000%	5.972%
2011	NPCC	1336	New England	U.S.	134,915,000	134,915,000			20.647%	20.647%	0.000%	0.000%	2.980%	2.980%	0.000%	0.000%	3.376%
2011	NPCC	1339	New York	U.S.	162,787,000	162,787,000			24.913%	24.913%	0.000%	0.000%	3.596%	3.596%	0.000%	0.000%	4.074%
2011	NPCC	1337	Ontario	Canada	143,343,000		143,343,000		21.937%	0.000%	21.937%	0.000%	3.167%	0.000%	3.167%	0.000%	
2011	NPCC	1341	Quebec	Canada	186,613,000		186,613,000		28.559%	0.000%	28.559%	0.000%	4.123%	0.000%	4.123%	0.000%	
2011	NPCC	1338	New Brunswick	Canada	13,866,000		13,866,000		2.122%	0.000%	2.122%	0.000%	0.306%	0.000%	0.306%	0.000%	
2011	NPCC	1340	Nova Scotia	Canada	11,908,000		11,908,000		1.822%	0.000%	1.822%	0.000%	0.263%	0.000%	0.263%	0.000%	
TOTAL NPCC					653,432,000	297,702,000	355,730,000	-	100.000%	45.560%	54.440%	0.000%	14.435%	6.577%	7.859%	0.000%	7.450%
2011	RFC	1104	Bay City	U.S.	332,819	332,819			0.036%	0.036%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.008%
2011	RFC	1102	Cannelton Utilities	U.S.	16,407	16,407			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	RFC	1105	City of Chelsea	U.S.	97,746	97,746			0.011%	0.011%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	RFC	1106	City of Croswell	U.S.	38,974	38,974			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	RFC	1108	City of Eaton Rapids	U.S.	97,463	97,463			0.011%	0.011%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	RFC	1111	City of Hart	U.S.	46,414	46,414			0.005%	0.005%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	RFC	1490	City of Lansing	U.S.	2,228,163	2,228,163			0.244%	0.244%	0.000%	0.000%	0.049%	0.049%	0.000%	0.000%	0.056%
2011	RFC	1112	City of Marquette Board of Light & Power	U.S.	330,549	330,549			0.036%	0.036%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.008%
2011	RFC	1114	City of Portland	U.S.	35,899	35,899			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	RFC	1116	City of St. Louis	U.S.	38,881	38,881			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	RFC	1118	City of Wyandotte	U.S.	182,481	182,481			0.020%	0.020%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.005%
2011	RFC	1120	Cloverland Electric Cooperative	U.S.	880,550	880,550			0.096%	0.096%	0.000%	0.000%	0.019%	0.019%	0.000%	0.000%	0.022%
2011	RFC	1122	CMS ERM Michigan LLC	U.S.	193,267	193,267			0.021%	0.021%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.005%

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2011	RFC	1124	Constellation New Energy (MECS-CONS)	U.S.	1,291,190	1,291,190			0.141%	0.141%	0.000%	0.000%	0.029%	0.029%	0.000%	0.000%	0.032%
2011	RFC	1123	Constellation New Energy (MECS-DET)	U.S.	1,204,038	1,204,038			0.132%	0.132%	0.000%	0.000%	0.027%	0.027%	0.000%	0.000%	0.030%
2011	RFC	1126	Consumers Energy Company	U.S.	33,602,986	33,602,986			3.679%	3.679%	0.000%	0.000%	0.742%	0.742%	0.000%	0.000%	0.841%
2011	RFC	1128	Detroit Edison Company	U.S.	45,338,158	45,338,158			4.964%	4.964%	0.000%	0.000%	1.002%	1.002%	0.000%	0.000%	1.135%
2011	RFC	1166	Duke Energy Indiana	U.S.	30,382,510	30,382,510			3.327%	3.327%	0.000%	0.000%	0.671%	0.671%	0.000%	0.000%	0.760%
2011	RFC	1135	Ferdinand Municipal Light & Water	U.S.	41,443	41,443			0.005%	0.005%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	RFC		FirstEnergy Solutions (MECS-DET)	U.S.	22,045	22,045			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.001%
2011	RFC	1549	FirstEnergy Solutions (MECS-DET)	U.S.	2,011,437	2,011,437			0.220%	0.220%	0.000%	0.000%	0.044%	0.044%	0.000%	0.000%	0.050%
2011	RFC	1612	Glacial Energy (MECS-DET)	U.S.	465,052	465,052			0.051%	0.051%	0.000%	0.000%	0.010%	0.010%	0.000%	0.000%	0.012%
2011	RFC	1144	Holland Board of Public Works	U.S.	791,998	791,998			0.087%	0.087%	0.000%	0.000%	0.017%	0.017%	0.000%	0.000%	0.020%
2011	RFC	1145	Hoosier Energy	U.S.	7,261,372	7,261,372			0.795%	0.795%	0.000%	0.000%	0.160%	0.160%	0.000%	0.000%	0.182%
2011	RFC	1148	Indiana Municipal Power Agency (DUKE CIN)	U.S.	2,955,759	2,955,759			0.324%	0.324%	0.000%	0.000%	0.065%	0.065%	0.000%	0.000%	0.074%
2011	RFC	1485	Indiana Municipal Power Agency (NIPSCO)	U.S.	419,342	419,342			0.046%	0.046%	0.000%	0.000%	0.009%	0.009%	0.000%	0.000%	0.010%
2011	RFC	1486	Indiana Municipal Power Agency (SIGE)	U.S.	597,854	597,854			0.065%	0.065%	0.000%	0.000%	0.013%	0.013%	0.000%	0.000%	0.015%
2011	RFC	1149	Indianapolis Power & Light Co.	U.S.	15,081,179	15,081,179			1.651%	1.651%	0.000%	0.000%	0.333%	0.333%	0.000%	0.000%	0.377%
2011	RFC	1553	Integrus Energy Services (MECS-CONS)	U.S.	479,640	479,640			0.053%	0.053%	0.000%	0.000%	0.011%	0.011%	0.000%	0.000%	0.012%
2011	RFC	1554	Integrus Energy Services (MECS-DET)	U.S.	361,468	361,468			0.040%	0.040%	0.000%	0.000%	0.008%	0.008%	0.000%	0.000%	0.009%
2011	RFC	1614	Just Energy (MECS-DET)	U.S.	20,088	20,088			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.001%
2011	RFC	1154	Michigan Public Power Agency	U.S.	1,217,681	1,217,681			0.133%	0.133%	0.000%	0.000%	0.027%	0.027%	0.000%	0.000%	0.030%
2011	RFC	1155	Michigan South Central Power Agency	U.S.	569,075	569,075			0.062%	0.062%	0.000%	0.000%	0.013%	0.013%	0.000%	0.000%	0.014%
2011	RFC	1158	MidAmerican Energy Company Retail	U.S.	94,412	94,412			0.010%	0.010%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	RFC	1163	Northern Indiana Public Service Co.	U.S.	17,649,919	17,649,919			1.933%	1.933%	0.000%	0.000%	0.390%	0.390%	0.000%	0.000%	0.442%
2011	RFC	1164	Ontonagon County Rural Electrification Assoc.	U.S.	29,071	29,071			0.003%	0.003%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	RFC	1265	PJM Interconnection, LLC	U.S.	700,638,595	700,638,595			76.716%	76.716%	0.000%	0.000%	15.478%	15.478%	0.000%	0.000%	17.532%
2011	RFC	1172	Sempra Energy Solutions (MECS-CONS)	U.S.	1,138,144	1,138,144			0.125%	0.125%	0.000%	0.000%	0.025%	0.025%	0.000%	0.000%	0.028%
2011	RFC	1171	Sempra Energy Solutions (MECS-DET)	U.S.	1,003,770	1,003,770			0.110%	0.110%	0.000%	0.000%	0.022%	0.022%	0.000%	0.000%	0.025%
2011	RFC	1176	Direct Energy (fka:Strategic Energy,LLC) (MECS-CON)	U.S.	9,008	9,008			0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	RFC	1174	Direct Energy (fka:Strategic Energy,LLC) (MECS-DET)	U.S.	353,412	353,412			0.039%	0.039%	0.000%	0.000%	0.008%	0.008%	0.000%	0.000%	0.009%
2011	RFC	1581	Spartan Renewable Energy	U.S.	62,962	62,962			0.007%	0.007%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.002%
2011	RFC	1180	Thumb Electric Cooperative	U.S.	169,977	169,977			0.019%	0.019%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.004%
2011	RFC	1627	US Department of Energy	U.S.	253,186	253,186			0.028%	0.028%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.006%
2011	RFC	1181	Vectren Energy Delivery of IN	U.S.	5,901,730	5,901,730			0.646%	0.646%	0.000%	0.000%	0.130%	0.130%	0.000%	0.000%	0.148%
2011	RFC	1183	Village of Sebawaing	U.S.	37,737	37,737			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	RFC	1184	Wabash Valley Power Association Inc. (DUKE CIN)	U.S.	2,721,459	2,721,459			0.298%	0.298%	0.000%	0.000%	0.060%	0.060%	0.000%	0.000%	0.068%
2011	RFC	1487	Wabash Valley Power Association Inc. (MECS CONS)	U.S.	149,784	149,784			0.016%	0.016%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.004%
2011	RFC	1488	Wabash Valley Power Association Inc.(NIPSCO)	U.S.	1,645,995	1,645,995			0.180%	0.180%	0.000%	0.000%	0.036%	0.036%	0.000%	0.000%	0.041%
2011	RFC	1185	Wisconsin Electric Power Co.	U.S.	29,113,348	29,113,348			3.188%	3.188%	0.000%	0.000%	0.643%	0.643%	0.000%	0.000%	0.729%
2011	RFC	1189	Wolverine Power Marketing Cooperative	U.S.	1,048,142	1,048,142			0.115%	0.115%	0.000%	0.000%	0.023%	0.023%	0.000%	0.000%	0.026%
2011	RFC	1191	Wolverine Power Supply Cooperative	U.S.	2,505,464	2,505,464			0.274%	0.274%	0.000%	0.000%	0.055%	0.055%	0.000%	0.000%	0.063%
2011	RFC	1190	Wolverine Power Marketing Cooperative	U.S.	128,517	128,517			0.014%	0.014%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.003%
TOTAL RELIABILITYFIRST					913,288,560	913,288,560	-	-	100.000%	100.000%	0.000%	0.000%	20.176%	20.176%	0.000%	0.000%	22.854%
2011	SERC	1267	Alabama Municipal Electric Authority	U.S.	3,584,000	3,584,000	-	-	0.344%	0.344%	0.000%	0.000%	0.079%	0.079%	0.000%	0.000%	0.090%
2011	SERC	1268	Alabama Power Company	U.S.	60,762,935	60,762,935	-	-	5.825%	5.825%	0.000%	0.000%	1.342%	1.342%	0.000%	0.000%	1.521%
2011	SERC	1269	Ameren - Illinois	U.S.	43,172,000	43,172,000	-	-	4.139%	4.139%	0.000%	0.000%	0.954%	0.954%	0.000%	0.000%	1.080%
2011	SERC	1271	Ameren - Missouri	U.S.	42,325,000	42,325,000	-	-	4.058%	4.058%	0.000%	0.000%	0.935%	0.935%	0.000%	0.000%	1.059%
2011	SERC	1272	APGI - Yadkin Division	U.S.	23,688	23,688	-	-	0.002%	0.002%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	SERC	1273	Associated Electric Cooperative Inc.	U.S.	19,604,990	19,604,990	-	-	1.879%	1.879%	0.000%	0.000%	0.433%	0.433%	0.000%	0.000%	0.491%
2011	SERC	1582	Beauregard Electric Cooperative, Inc.	U.S.	1,098,669	1,098,669	-	-	0.105%	0.105%	0.000%	0.000%	0.024%	0.024%	0.000%	0.000%	0.027%
2011	SERC	1462	Benton Utility District	U.S.	291,067	291,067	-	-	0.028%	0.028%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.007%
2011	SERC	1274	Big Rivers Electric Corporation	U.S.	10,699,333	10,699,333	-	-	1.026%	1.026%	0.000%	0.000%	0.236%	0.236%	0.000%	0.000%	0.268%
2011	SERC	1275	Black Warrior EMC	U.S.	442,854	442,854	-	-	0.042%	0.042%	0.000%	0.000%	0.010%	0.010%	0.000%	0.000%	0.011%
2011	SERC	1276	Blue Ridge EMC	U.S.	1,393,046	1,393,046	-	-	0.134%	0.134%	0.000%	0.000%	0.031%	0.031%	0.000%	0.000%	0.035%
2011	SERC	1628	Brazos Electric Power Cooperative, Inc.	U.S.	426,252	426,252	-	-	0.041%	0.041%	0.000%	0.000%	0.009%	0.009%	0.000%	0.000%	0.011%

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NEL (MWh)	U.S. NEL	Canada NEL	Mexico NEL	% of RE total	US Total	Canada Total	Mexico Total	% of ERO Total	US Total	Canada Total	Mexico Total	% of ERO - US Only
2011	SERC	1463	Canton, MS	U.S.	129,759	129,759	-		0.012%	0.012%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.003%
2011	SERC	1277	Central Electric Power Cooperative Inc.	U.S.	16,018,210	16,018,210	-		1.536%	1.536%	0.000%	0.000%	0.354%	0.354%	0.000%	0.000%	0.401%
2011	SERC	1278	City of Blountstown FL	U.S.	40,730	40,730	-		0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	SERC	1279	City of Camden SC	U.S.	204,997	204,997	-		0.020%	0.020%	0.000%	0.000%	0.005%	0.005%	0.000%	0.000%	0.005%
2011	SERC	1280	City of Collins MS	U.S.	47,686	47,686	-		0.005%	0.005%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	SERC	1281	City of Columbia MO	U.S.	1,186,640	1,186,640	-		0.114%	0.114%	0.000%	0.000%	0.026%	0.026%	0.000%	0.000%	0.030%
2011	SERC	1282	City of Conway AR (Conway Corporation)	U.S.	1,054,201	1,054,201	-		0.101%	0.101%	0.000%	0.000%	0.023%	0.023%	0.000%	0.000%	0.026%
2011	SERC	1284	City of Evergreen AL	U.S.	61,707	61,707	-		0.006%	0.006%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.002%
2011	SERC	1285	City of Hampton GA	U.S.	26,787	26,787	-		0.003%	0.003%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	SERC	1286	City of Hartford AL	U.S.	34,292	34,292	-		0.003%	0.003%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	SERC	1287	City of Henderson (KY) Municipal Power & Light	U.S.	622,844	622,844	-		0.060%	0.060%	0.000%	0.000%	0.014%	0.014%	0.000%	0.000%	0.016%
2011	SERC	1288	City of North Little Rock AR (DENL)	U.S.	990,134	990,134	-		0.095%	0.095%	0.000%	0.000%	0.022%	0.022%	0.000%	0.000%	0.025%
2011	SERC	1289	City of Orangeburg SC Department of Public Utilities	U.S.	757,337	757,337	-		0.073%	0.073%	0.000%	0.000%	0.017%	0.017%	0.000%	0.000%	0.019%
2011	SERC	1290	City of Robertsdale AL	U.S.	87,822	87,822	-		0.008%	0.008%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	SERC	1291	City of Ruston LA (DERS)	U.S.	291,155	291,155	-		0.028%	0.028%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.007%
2011	SERC	1292	City of Seneca SC	U.S.	163,232	163,232	-		0.016%	0.016%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.004%
2011	SERC	1115	City of Springfield (CWLP)	U.S.	1,873,853	1,873,853	-		0.180%	0.180%	0.000%	0.000%	0.041%	0.041%	0.000%	0.000%	0.047%
2011	SERC	1465	City of Thayer, MO	U.S.	20,289	20,289	-		0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.001%
2011	SERC	1293	City of Troy AL	U.S.	419,171	419,171	-		0.040%	0.040%	0.000%	0.000%	0.009%	0.009%	0.000%	0.000%	0.010%
2011	SERC	1294	City of West Memphis AR (West Memphis Utilities)	U.S.	394,287	394,287	-		0.038%	0.038%	0.000%	0.000%	0.009%	0.009%	0.000%	0.000%	0.010%
2011	SERC	1583	Claiborne Electric Cooperative, Inc.	U.S.	680,273	680,273	-		0.065%	0.065%	0.000%	0.000%	0.015%	0.015%	0.000%	0.000%	0.017%
2011	SERC	1584	Concordia Electric Cooperative, Inc.	U.S.	263,860	263,860	-		0.025%	0.025%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.007%
2011	SERC	1283	Dalton Utilities	U.S.	1,520,674	1,520,674	-		0.146%	0.146%	0.000%	0.000%	0.034%	0.034%	0.000%	0.000%	0.038%
2011	SERC	1585	Dixie Electric Membership Corporation	U.S.	2,334,200	2,334,200	-		0.224%	0.224%	0.000%	0.000%	0.052%	0.052%	0.000%	0.000%	0.058%
2011	SERC	1295	Dominion Virginia Power	U.S.	84,117,446	84,117,446	-		8.064%	8.064%	0.000%	0.000%	1.858%	1.858%	0.000%	0.000%	2.105%
2011	SERC	1296	Duke Energy Carolinas, LLC	U.S.	83,342,027	83,342,027	-		7.990%	7.990%	0.000%	0.000%	1.841%	1.841%	0.000%	0.000%	2.086%
2011	SERC	1466	Durant, MS	U.S.	28,078	28,078	-		0.003%	0.003%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	SERC	1478	E.ON U.S. Services Inc.	U.S.	34,754,832	34,754,832	-		3.332%	3.332%	0.000%	0.000%	0.768%	0.768%	0.000%	0.000%	0.870%
2011	SERC	1297	East Kentucky Power Cooperative	U.S.	12,504,726	12,504,726	-		1.199%	1.199%	0.000%	0.000%	0.276%	0.276%	0.000%	0.000%	0.313%
2011	SERC	1298	East Mississippi Electric Power Association	U.S.	475,932	475,932	-		0.046%	0.046%	0.000%	0.000%	0.011%	0.011%	0.000%	0.000%	0.012%
2011	SERC	1629	East Texas Electric Cooperative Inc	U.S.	2,099,953	2,099,953	-		0.201%	0.201%	0.000%	0.000%	0.046%	0.046%	0.000%	0.000%	0.053%
2011	SERC	1299	Electric Energy Inc.	U.S.	1,328,066	1,328,066	-		0.127%	0.127%	0.000%	0.000%	0.029%	0.029%	0.000%	0.000%	0.033%
2011	SERC	1300	EnergyUnited EMC	U.S.	2,529,521	2,529,521	-		0.242%	0.242%	0.000%	0.000%	0.056%	0.056%	0.000%	0.000%	0.063%
2011	SERC	1301	Entergy	U.S.	117,912,951	117,912,951	-		11.304%	11.304%	0.000%	0.000%	2.605%	2.605%	0.000%	0.000%	2.951%
2011	SERC	1302	Fayetteville (NC) Public Works Commission	U.S.	2,241,224	2,241,224	-		0.215%	0.215%	0.000%	0.000%	0.050%	0.050%	0.000%	0.000%	0.056%
2011	SERC	1303	Florida Public Utilities (FL Panhandle Load)	U.S.	343,671	343,671	-		0.033%	0.033%	0.000%	0.000%	0.008%	0.008%	0.000%	0.000%	0.009%
2011	SERC	1304	French Broad EMC	U.S.	557,067	557,067	-		0.053%	0.053%	0.000%	0.000%	0.012%	0.012%	0.000%	0.000%	0.014%
2011	SERC	1305	Georgia Power Company	U.S.	91,530,659	91,530,659	-		8.775%	8.775%	0.000%	0.000%	2.022%	2.022%	0.000%	0.000%	2.290%
2011	SERC	1306	Georgia System Optns Corporation	U.S.	39,145,419	39,145,419	-		3.753%	3.753%	0.000%	0.000%	0.865%	0.865%	0.000%	0.000%	0.980%
2011	SERC	1479	Greenwood (MS) Utilities Commission	U.S.	283,965	283,965	-		0.027%	0.027%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.007%
2011	SERC	1307	Greenwood (SC) Commissioners of Public Works	U.S.	266,127	266,127	-		0.026%	0.026%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.007%
2011	SERC	1308	Gulf Power Company	U.S.	12,253,385	12,253,385	-		1.175%	1.175%	0.000%	0.000%	0.271%	0.271%	0.000%	0.000%	0.307%
2011	SERC	1586	Haywood EMC	U.S.	301,762	301,762	-		0.029%	0.029%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.008%
2011	SERC	1309	Illinois Municipal Electric Agency	U.S.	1,939,000	1,939,000	-		0.186%	0.186%	0.000%	0.000%	0.043%	0.043%	0.000%	0.000%	0.049%
2011	SERC	1480	Itta Bena, MS	U.S.	16,464	16,464	-		0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	SERC	1587	Jefferson Davis Electric Cooperative, Inc.	U.S.	276,583	276,583	-		0.027%	0.027%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.007%
2011	SERC	1617	Kentucky Municipal Power	U.S.	739,760	739,760	-		0.071%	0.071%	0.000%	0.000%	0.016%	0.016%	0.000%	0.000%	0.019%
2011	SERC	1481	Kosciusko, MS	U.S.	77,043	77,043	-		0.007%	0.007%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	SERC	1482	Leland, MS	U.S.	34,439	34,439	-		0.003%	0.003%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	SERC	1313	McCormick Commission of Public Works	U.S.	17,681	17,681	-		0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	SERC	1314	Mississippi Power Company	U.S.	10,765,370	10,765,370	-		1.032%	1.032%	0.000%	0.000%	0.238%	0.238%	0.000%	0.000%	0.269%
2011	SERC	1630	Mt. Carmel Public Utility	U.S.	110,658	110,658	-		0.011%	0.011%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.003%
2011	SERC	1315	Municipal Electric Authority of Georgia	U.S.	11,042,776	11,042,776	-		1.059%	1.059%	0.000%	0.000%	0.244%	0.244%	0.000%	0.000%	0.276%
2011	SERC	1316	N.C. Electric Membership Corp.	U.S.	12,412,638	12,412,638	-		1.190%	1.190%	0.000%	0.000%	0.274%	0.274%	0.000%	0.000%	0.311%

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NEL (MWh)	U.S. NEL	Canada NEL	Mexico NEL	% of RE total	US Total	Canada Total	Mexico Total	% of ERO Total	US Total	Canada Total	Mexico Total	% of ERO - US Only
2011	SERC	1317	North Carolina Eastern Municipal Power Agency	U.S.	7,634,375	7,634,375	-	-	0.732%	0.732%	0.000%	0.000%	0.169%	0.169%	0.000%	0.000%	0.191%
2011	SERC	1318	North Carolina Municipal Power Agency #1	U.S.	4,784,635	4,784,635	-	-	0.459%	0.459%	0.000%	0.000%	0.106%	0.106%	0.000%	0.000%	0.120%
2011	SERC	1588	Northeast Louisiana Power Cooperative, Inc.	U.S.	300,400	300,400	-	-	0.029%	0.029%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.008%
2011	SERC	1574	Northern Virginia Electric Cooperative	U.S.	3,765,576	3,765,576	-	-	0.361%	0.361%	0.000%	0.000%	0.083%	0.083%	0.000%	0.000%	0.094%
2011	SERC	1319	Old Dominion Electric Cooperative	U.S.	5,935,200	5,935,200	-	-	0.569%	0.569%	0.000%	0.000%	0.131%	0.131%	0.000%	0.000%	0.149%
2011	SERC	1618	Osceola (Arkansas) Municipal Light and Power	U.S.	182,326	182,326	-	-	0.017%	0.017%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.005%
2011	SERC	1320	Owensboro (KY) Municipal Utilities	U.S.	908,159	908,159	-	-	0.087%	0.087%	0.000%	0.000%	0.020%	0.020%	0.000%	0.000%	0.023%
2011	SERC	1322	Piedmont EMC in Duke and Progress Areas	U.S.	508,975	508,975	-	-	0.049%	0.049%	0.000%	0.000%	0.011%	0.011%	0.000%	0.000%	0.013%
2011	SERC	1323	Piedmont Municipal Power Agency (PMPA)	U.S.	2,357,985	2,357,985	-	-	0.226%	0.226%	0.000%	0.000%	0.052%	0.052%	0.000%	0.000%	0.059%
2011	SERC	1589	Pointe Coupee Electric Memb. Corp.	U.S.	265,492	265,492	-	-	0.025%	0.025%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.007%
2011	SERC	1266	PowerSouth Energy	U.S.	8,545,996	8,545,996	-	-	0.819%	0.819%	0.000%	0.000%	0.189%	0.189%	0.000%	0.000%	0.214%
2011	SERC	1330	Prairie Power, Inc.	U.S.	1,552,685	1,552,685	-	-	0.149%	0.149%	0.000%	0.000%	0.034%	0.034%	0.000%	0.000%	0.039%
2011	SERC	1324	Progress Energy Carolinas	U.S.	46,239,000	46,239,000	-	-	4.433%	4.433%	0.000%	0.000%	1.021%	1.021%	0.000%	0.000%	1.157%
2011	SERC	1325	Rutherford EMC	U.S.	1,299,678	1,299,678	-	-	0.125%	0.125%	0.000%	0.000%	0.029%	0.029%	0.000%	0.000%	0.033%
2011	SERC	1631	Sam Rayburn G&T Electric Cooperative Inc.	U.S.	1,887,147	1,887,147	-	-	0.181%	0.181%	0.000%	0.000%	0.042%	0.042%	0.000%	0.000%	0.047%
2011	SERC	1326	South Carolina Electric & Gas Company	U.S.	23,293,409	23,293,409	-	-	2.233%	2.233%	0.000%	0.000%	0.515%	0.515%	0.000%	0.000%	0.583%
2011	SERC	1327	South Carolina Public Service Authority	U.S.	11,320,555	11,320,555	-	-	1.085%	1.085%	0.000%	0.000%	0.250%	0.250%	0.000%	0.000%	0.283%
2011	SERC	1590	South Louisiana Electric Cooperative Association	U.S.	650,698	650,698	-	-	0.062%	0.062%	0.000%	0.000%	0.014%	0.014%	0.000%	0.000%	0.016%
2011	SERC	1328	South Mississippi Electric Power Association	U.S.	10,345,945	10,345,945	-	-	0.992%	0.992%	0.000%	0.000%	0.229%	0.229%	0.000%	0.000%	0.259%
2011	SERC	1329	Southern Illinois Power Cooperative	U.S.	1,470,000	1,470,000	-	-	0.141%	0.141%	0.000%	0.000%	0.032%	0.032%	0.000%	0.000%	0.037%
2011	SERC	1591	Southwest Louisiana Electric Membership Corporat	U.S.	2,603,178	2,603,178	-	-	0.250%	0.250%	0.000%	0.000%	0.058%	0.058%	0.000%	0.000%	0.065%
2011	SERC	1619	Southwestern Electric Cooperative, Inc.	U.S.	462,555	462,555	-	-	0.044%	0.044%	0.000%	0.000%	0.010%	0.010%	0.000%	0.000%	0.012%
2011	SERC	1331	Tennessee Valley Authority	U.S.	168,496,918	168,496,918	-	-	16.153%	16.153%	0.000%	0.000%	3.722%	3.722%	0.000%	0.000%	4.216%
2011	SERC	1632	Tex-La Electric Cooperative of Texas, Inc	U.S.	212,806	212,806	-	-	0.020%	0.020%	0.000%	0.000%	0.005%	0.005%	0.000%	0.000%	0.005%
2011	SERC	1332	Tombigbee Electric Cooperative Inc.	U.S.	151,225	151,225	-	-	0.014%	0.014%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.004%
2011	SERC	1592	Town of Black Creek, N.C.	U.S.	12,732	12,732	-	-	0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	SERC	1593	Town of Lucama, N.C.	U.S.	21,018	21,018	-	-	0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.001%
2011	SERC	1594	Town of Sharpsburg, N.C.	U.S.	20,449	20,449	-	-	0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.001%
2011	SERC	1595	Town of Stantonsburg, N.C.	U.S.	22,980	22,980	-	-	0.002%	0.002%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	SERC	1333	Town of Waynesville NC	U.S.	91,149	91,149	-	-	0.009%	0.009%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	SERC	1334	Town of Winnsboro SC	U.S.	54,708	54,708	-	-	0.005%	0.005%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	SERC	1335	Town of Winterville NC	U.S.	53,282	53,282	-	-	0.005%	0.005%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	SERC	1597	Washington-St. Tammany Electric Cooperative, Inc.	U.S.	1,161,646	1,161,646	-	-	0.111%	0.111%	0.000%	0.000%	0.026%	0.026%	0.000%	0.000%	0.029%
TOTAL SERC					1,043,110,079	1,043,110,079	-	-	100.000%	100.000%	0.000%	0.000%	23.044%	23.044%	0.000%	0.000%	26.102%
2011	SPP	1246	American Electric Power	U.S.	38,000,922	38,000,922	-	-	17.410%	17.410%	0.000%	0.000%	0.839%	0.839%	0.000%	0.000%	0.951%
2011	SPP	1435	Arkansas Electric Cooperative Corporation (AEP)	U.S.	4,762,650	4,762,650	-	-	2.182%	2.182%	0.000%	0.000%	0.105%	0.105%	0.000%	0.000%	0.119%
2011	SPP	1247	Board of Public Utilities (Kansas City KS)	U.S.	2,479,695	2,479,695	-	-	1.136%	1.136%	0.000%	0.000%	0.055%	0.055%	0.000%	0.000%	0.062%
2011	SPP	1620	Board of Public Utilities, City of McPherson, Kansas	U.S.	923,166	923,166	-	-	0.423%	0.423%	0.000%	0.000%	0.020%	0.020%	0.000%	0.000%	0.023%
2011	SPP		Carthage City Water & Light	U.S.	287,614	287,614	-	-	0.132%	0.132%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.007%
2011	SPP	1469	Central Valley Electric Cooperative	U.S.	778,930	778,930	-	-	0.357%	0.357%	0.000%	0.000%	0.017%	0.017%	0.000%	0.000%	0.019%
2011	SPP	1556	City of Bentonville	U.S.	634,058	634,058	-	-	0.290%	0.290%	0.000%	0.000%	0.014%	0.014%	0.000%	0.000%	0.016%
2011	SPP	1557	City of Clarksdale, Mississippi	U.S.	174,717	174,717	-	-	0.080%	0.080%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.004%
2011	SPP	1633	City of Lindsborg	U.S.	31,659	31,659	-	-	0.015%	0.015%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	SPP	1558	Hope Water & Light (HWL)	U.S.	299,422	299,422	-	-	0.137%	0.137%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.007%
2011	SPP	1559	City of Minden	U.S.	177,361	177,361	-	-	0.081%	0.081%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.004%
2011	SPP	1634	City of Mulvane	U.S.	45,630	45,630	-	-	0.021%	0.021%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	SPP	1635	The City of Osage City	U.S.	36,095	36,095	-	-	0.017%	0.017%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	SPP	1636	City of Prescott	U.S.	89,896	89,896	-	-	0.041%	0.041%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	SPP	1248	Independence Power & Light (Independence, MO)	U.S.	1,132,656	1,132,656	-	-	0.519%	0.519%	0.000%	0.000%	0.025%	0.025%	0.000%	0.000%	0.028%
2011	SPP	1436	City Utilities of Springfield, MO	U.S.	3,275,267	3,275,267	-	-	1.501%	1.501%	0.000%	0.000%	0.072%	0.072%	0.000%	0.000%	0.082%
2011	SPP	1249	Cleco Power LLC	U.S.	11,954,457	11,954,457	-	-	5.477%	5.477%	0.000%	0.000%	0.264%	0.264%	0.000%	0.000%	0.299%
2011	SPP	1437	East Texas Electric Coop, Inc.	U.S.	452,191	452,191	-	-	0.207%	0.207%	0.000%	0.000%	0.010%	0.010%	0.000%	0.000%	0.011%
2011	SPP	1250	The Empire District Electric Company	U.S.	5,452,111	5,452,111	-	-	2.498%	2.498%	0.000%	0.000%	0.120%	0.120%	0.000%	0.000%	0.136%

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NEL (MWh)	U.S. NEL	Canada NEL	Mexico NEL	% of RE total	US Total	Canada Total	Mexico Total	% of ERO Total	US Total	Canada Total	Mexico Total	% of ERO - US Only
2011	SPP	1470	Farmers' Electric Coop	U.S.	478,341	478,341			0.219%	0.219%	0.000%	0.000%	0.011%	0.011%	0.000%	0.000%	0.012%
2011	SPP	1438	Golden Spread Electric Coop	U.S.	5,824,681	5,824,681			2.669%	2.669%	0.000%	0.000%	0.129%	0.129%	0.000%	0.000%	0.146%
2011	SPP	1251	Grand River Dam Authority	U.S.	4,822,987	4,822,987			2.210%	2.210%	0.000%	0.000%	0.107%	0.107%	0.000%	0.000%	0.121%
2011	SPP		Jonesboro City Water & Light	U.S.	1,358,065	1,358,065			0.622%	0.622%	0.000%	0.000%	0.030%	0.030%	0.000%	0.000%	0.034%
2011	SPP	1252	Kansas City Power & Light (KCPL)	U.S.	16,244,874	16,244,874			7.442%	7.442%	0.000%	0.000%	0.359%	0.359%	0.000%	0.000%	0.407%
2011	SPP	1439	Kansas Electric Power Coop., Inc	U.S.	2,220,417	2,220,417			1.017%	1.017%	0.000%	0.000%	0.049%	0.049%	0.000%	0.000%	0.056%
2011	SPP	1440	Kansas Municipal Energy Agency (KCPL)	U.S.	801,867	801,867			0.367%	0.367%	0.000%	0.000%	0.018%	0.018%	0.000%	0.000%	0.020%
2011	SPP	1637	Kansas Power Pool	U.S.	1,430,947	1,430,947			0.656%	0.656%	0.000%	0.000%	0.032%	0.032%	0.000%	0.000%	0.036%
2011	SPP	1560	Kaw Valley Electric Cooperative, Inc.	U.S.	169,360	169,360			0.078%	0.078%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.004%
2011	SPP		Kennett Board of Public Works	U.S.	156,363	156,363			0.072%	0.072%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.004%
2011	SPP	1598	KCP&L GMOCC (Greater Missouri Operations Comp	U.S.	8,934,041	8,934,041			4.093%	4.093%	0.000%	0.000%	0.197%	0.197%	0.000%	0.000%	0.224%
2011	SPP	1471	Lafayette Utilities System	U.S.	2,176,688	2,176,688			0.997%	0.997%	0.000%	0.000%	0.048%	0.048%	0.000%	0.000%	0.054%
2011	SPP	1472	Lea County Electric Coop	U.S.	1,315,605	1,315,605			0.603%	0.603%	0.000%	0.000%	0.029%	0.029%	0.000%	0.000%	0.033%
2011	SPP	1253	Louisiana Energy & Power Authority (LEPA)	U.S.	1,000,906	1,000,906			0.459%	0.459%	0.000%	0.000%	0.022%	0.022%	0.000%	0.000%	0.025%
2011	SPP		Malden Board of Public Works	U.S.	52,879	52,879			0.024%	0.024%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	SPP	1441	Midwest Energy Inc.	U.S.	1,821,226	1,821,226			0.834%	0.834%	0.000%	0.000%	0.040%	0.040%	0.000%	0.000%	0.046%
2011	SPP	1443	Missouri Joint Municipal Electric Utility Commission	U.S.	2,619,748	2,619,748			1.200%	1.200%	0.000%	0.000%	0.058%	0.058%	0.000%	0.000%	0.066%
2011	SPP	1638	Nemaha Marshall Electric Cooperative (NMEC)	U.S.	61,376	61,376			0.028%	0.028%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.002%
2011	SPP	1442	Northeast Texas Electric Cooperative, Inc.	U.S.	3,409,158	3,409,158			1.562%	1.562%	0.000%	0.000%	0.075%	0.075%	0.000%	0.000%	0.085%
2011	SPP	1255	Oklahoma Gas and Electric Co.	U.S.	29,341,893	29,341,893			13.443%	13.443%	0.000%	0.000%	0.648%	0.648%	0.000%	0.000%	0.734%
2011	SPP	1444	Oklahoma Municipal Power Auth	U.S.	2,992,564	2,992,564			1.371%	1.371%	0.000%	0.000%	0.066%	0.066%	0.000%	0.000%	0.075%
2011	SPP	1639	OzMo Ozark Missouri, West Plains MO	U.S.	209,318	209,318			0.096%	0.096%	0.000%	0.000%	0.005%	0.005%	0.000%	0.000%	0.005%
2011	SPP		Paragould Light, Water & Cable	U.S.	603,309	603,309			0.276%	0.276%	0.000%	0.000%	0.013%	0.013%	0.000%	0.000%	0.015%
2011	SPP		Piggott Municipal Light, Water & Sewer	U.S.	44,661	44,661			0.020%	0.020%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	SPP		Poplar Bluff Municipal Utilities	U.S.	393,303	393,303			0.180%	0.180%	0.000%	0.000%	0.009%	0.009%	0.000%	0.000%	0.010%
2011	SPP	1561	Public Service Commission of Yazoo City of Mississi	U.S.	128,251	128,251			0.059%	0.059%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.003%
2011	SPP	1473	Roosevelt County Electric Coop	U.S.	233,180	233,180			0.107%	0.107%	0.000%	0.000%	0.005%	0.005%	0.000%	0.000%	0.006%
2011	SPP	1468	Sharyland Utilities, LP	U.S.	1,094,986	1,094,986			0.502%	0.502%	0.000%	0.000%	0.024%	0.024%	0.000%	0.000%	0.027%
2011	SPP		Sikeston Board of Municipal Utilities	U.S.	371,573	371,573			0.170%	0.170%	0.000%	0.000%	0.008%	0.008%	0.000%	0.000%	0.009%
2011	SPP	1258	Southwestern Power Administration (SPA)	U.S.	255,186	255,186			0.117%	0.117%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.006%
2011	SPP	1257	Southwestern Public Service Co. (SPS-XCEL)	U.S.	16,984,981	16,984,981			7.782%	7.782%	0.000%	0.000%	0.375%	0.375%	0.000%	0.000%	0.425%
2011	SPP	1256	Sunflower Electric Power Cooperative	U.S.	5,821,500	5,821,500			2.667%	2.667%	0.000%	0.000%	0.129%	0.129%	0.000%	0.000%	0.146%
2011	SPP	1445	Tex - La Electric Cooperative of Texas	U.S.	535,530	535,530			0.245%	0.245%	0.000%	0.000%	0.012%	0.012%	0.000%	0.000%	0.013%
2011	SPP	1475	Tri County Electric Coop	U.S.	423,163	423,163			0.194%	0.194%	0.000%	0.000%	0.009%	0.009%	0.000%	0.000%	0.011%
2011	SPP	1260	Westar Energy, Inc.	U.S.	22,029,873	22,029,873			10.093%	10.093%	0.000%	0.000%	0.487%	0.487%	0.000%	0.000%	0.551%
2011	SPP	1259	Western Farmers Electric Cooperative	U.S.	7,933,878	7,933,878			3.635%	3.635%	0.000%	0.000%	0.175%	0.175%	0.000%	0.000%	0.199%
2011	SPP	1501	West Texas Municipal Power Agency	U.S.	2,988,130	2,988,130			1.369%	1.369%	0.000%	0.000%	0.066%	0.066%	0.000%	0.000%	0.075%
			TOTAL SPP		218,273,305	218,273,305	-	-	100.000%	100.000%	0.000%	0.000%	4.822%	4.822%	0.000%	0.000%	5.462%
2011	TRE	1019	ERCOT	U.S.	335,000,176	335,000,176			100.000%	100.000%	0.000%	0.000%	7.401%	7.401%	0.000%	0.000%	8.383%
					335,000,176	335,000,176	-	-	100.000%	100.000%	0.000%	0.000%	7.401%	7.401%	0.000%	0.000%	8.383%
2011	WECC		Alberta Electric System Operator	Canada	58,737,634		58,737,634		6.857%	0.000%	6.857%	0.000%	1.298%	0.000%	1.298%	0.000%	0.000%
2011	WECC		British Columbia Hydro & Power Authority	Canada	60,568,272		60,568,272		7.070%	0.000%	7.070%	0.000%	1.338%	0.000%	1.338%	0.000%	0.000%
2011	WECC		Comision Federal de Electricidad	Mexico	11,041,442			11,041,442	1.289%	0.000%	0.000%	1.289%	0.244%	0.000%	0.000%	0.244%	0.000%
2011	WECC		Aha Macav Power Service	U.S.	26,075	26,075			0.003%	0.003%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Ajo Improvement District	U.S.	14,043	14,043			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Ak-Chin	U.S.	33,615	33,615			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Alcoa Inc	U.S.	3,207,048	3,207,048			0.374%	0.374%	0.000%	0.000%	0.071%	0.071%	0.000%	0.000%	0.080%
2011	WECC		Arizona Public Service Company	U.S.	30,576,014	30,576,014			3.569%	3.569%	0.000%	0.000%	0.675%	0.675%	0.000%	0.000%	0.765%
2011	WECC		Arkansas River Power Authority (ARPA)	U.S.	303,725	303,725			0.035%	0.035%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.008%
2011	WECC		Avista Corporation	U.S.	9,374,611	9,374,611			1.094%	1.094%	0.000%	0.000%	0.207%	0.207%	0.000%	0.000%	0.235%
2011	WECC		Avista Corporation	U.S.	178,261	178,261			0.021%	0.021%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.004%
2011	WECC		Barrick Goldstrike Mines Inc.	U.S.	1,178,391	1,178,391			0.138%	0.138%	0.000%	0.000%	0.026%	0.026%	0.000%	0.000%	0.029%

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NEL (MWh)	U.S. NEL	Canada NEL	Mexico NEL	% of RE total	US Total	Canada Total	Mexico Total	% of ERO Total	US Total	Canada Total	Mexico Total	% of ERO - US Only
2011	WECC		Basin Electric Power Cooperative	U.S.	3,339,670	3,339,670			0.390%	0.390%	0.000%	0.000%	0.074%	0.074%	0.000%	0.000%	0.084%
2011	WECC		Basin Electric Power Cooperative	U.S.	56,271	56,271			0.007%	0.007%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Benton REA	U.S.	543,059	543,059			0.063%	0.063%	0.000%	0.000%	0.012%	0.012%	0.000%	0.000%	0.014%
2011	WECC		Big Bend Electric Cooperative, Inc.	U.S.	134,232	134,232			0.016%	0.016%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.003%
2011	WECC		Big Bend Electric Cooperative, Inc.	U.S.	342,497	342,497			0.040%	0.040%	0.000%	0.000%	0.008%	0.008%	0.000%	0.000%	0.009%
2011	WECC		Big Bend Electric Cooperative, Inc.	U.S.	37,310	37,310			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Blachly-Lane Electric Cooperative	U.S.	160,310	160,310			0.019%	0.019%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.004%
2011	WECC		Black Hills Power	U.S.	1,884,095	1,884,095			0.220%	0.220%	0.000%	0.000%	0.042%	0.042%	0.000%	0.000%	0.047%
2011	WECC		Black Hills Power/Cheyenne Light Fuel & Power	U.S.	3,590,754	3,590,754			0.419%	0.419%	0.000%	0.000%	0.079%	0.079%	0.000%	0.000%	0.090%
2011	WECC		Bonneville Power Administration	U.S.	4,542,410	4,542,410			0.530%	0.530%	0.000%	0.000%	0.100%	0.100%	0.000%	0.000%	0.114%
2011	WECC		Bonneville Power Administration	U.S.	1,671,451	1,671,451			0.195%	0.195%	0.000%	0.000%	0.037%	0.037%	0.000%	0.000%	0.042%
2011	WECC		Bonneville Power Administration	U.S.	766,543	766,543			0.089%	0.089%	0.000%	0.000%	0.017%	0.017%	0.000%	0.000%	0.019%
2011	WECC		Bonneville Power Administration	U.S.	6,303	6,303			0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Bonneville Power Administration	U.S.	16,779	16,779			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		BPA - USBR Load	U.S.	133,479	133,479			0.016%	0.016%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.003%
2011	WECC		Bureau of Reclamation (Desalter) - c/o DSW EMMO	U.S.	1,376	1,376			0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Bureau of Reclamation (Wellfield) - c/o DSW EMMC	U.S.	5,137	5,137			0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		California Independent System Operator	U.S.	229,559,674	229,559,674			26.797%	26.797%	0.000%	0.000%	5.071%	5.071%	0.000%	0.000%	5.744%
2011	WECC		Canby Public Utility Board	U.S.	178,411	178,411			0.021%	0.021%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.004%
2011	WECC		Central Arizona Water Conservation District	U.S.	1,844,273	1,844,273			0.215%	0.215%	0.000%	0.000%	0.041%	0.041%	0.000%	0.000%	0.046%
2011	WECC		Central Arizona Water Conservation District	U.S.	1,457,739	1,457,739			0.170%	0.170%	0.000%	0.000%	0.032%	0.032%	0.000%	0.000%	0.036%
2011	WECC		Central Electric Cooperative	U.S.	517,142	517,142			0.060%	0.060%	0.000%	0.000%	0.011%	0.011%	0.000%	0.000%	0.013%
2011	WECC		Central Lincoln PUD	U.S.	1,356,113	1,356,113			0.158%	0.158%	0.000%	0.000%	0.030%	0.030%	0.000%	0.000%	0.034%
2011	WECC		Central Montana Electric Power Cooperative	U.S.	30,692	30,692			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Central Montana Electric Power Cooperative	U.S.	91,421	91,421			0.011%	0.011%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	WECC		City of Aztec Electric Dept	U.S.	34,682	34,682			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		City of Bandon	U.S.	67,417	67,417			0.008%	0.008%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.002%
2011	WECC		City of Blaine	U.S.	79,509	79,509			0.009%	0.009%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	WECC		City of Bonners Ferry	U.S.	67,686	67,686			0.008%	0.008%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.002%
2011	WECC		City of Boulder City	U.S.	162,539	162,539			0.019%	0.019%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.004%
2011	WECC		City of Cascade Locks	U.S.	19,883	19,883			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		City of Centralia	U.S.	277,850	277,850			0.032%	0.032%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.007%
2011	WECC		City of Cheney	U.S.	143,878	143,878			0.017%	0.017%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.004%
2011	WECC		City of Chewelah	U.S.	24,502	24,502			0.003%	0.003%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		City of Drain	U.S.	16,879	16,879			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		City of Ellensburg	U.S.	205,752	205,752			0.024%	0.024%	0.000%	0.000%	0.005%	0.005%	0.000%	0.000%	0.005%
2011	WECC		City of Fallon	U.S.	116,364	116,364			0.014%	0.014%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.003%
2011	WECC		City of Forest Grove	U.S.	244,705	244,705			0.029%	0.029%	0.000%	0.000%	0.005%	0.005%	0.000%	0.000%	0.006%
2011	WECC		City of Gallup	U.S.	220,126	220,126			0.026%	0.026%	0.000%	0.000%	0.005%	0.005%	0.000%	0.000%	0.006%
2011	WECC		City of Henderson	U.S.	14,207	14,207			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		City of Hermiston, DBA Hermiston Energy Services	U.S.	109,377	109,377			0.013%	0.013%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.003%
2011	WECC		City of Las Vegas	U.S.	45,810	45,810			0.005%	0.005%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		City of McCleary	U.S.	30,023	30,023			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		City of McMinnville	U.S.	744,405	744,405			0.087%	0.087%	0.000%	0.000%	0.016%	0.016%	0.000%	0.000%	0.019%
2011	WECC		City of Mesa	U.S.	257,789	257,789			0.030%	0.030%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.006%
2011	WECC		City of Milton	U.S.	63,719	63,719			0.007%	0.007%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.002%
2011	WECC		City of Milton-Freewater	U.S.	110,129	110,129			0.013%	0.013%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.003%
2011	WECC		City of Monmouth	U.S.	73,209	73,209			0.009%	0.009%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	WECC		City of Needles	U.S.	31,761	31,761			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		City of Plummer	U.S.	35,274	35,274			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		City of Port Angeles	U.S.	755,462	755,462			0.088%	0.088%	0.000%	0.000%	0.017%	0.017%	0.000%	0.000%	0.019%

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NEL (MWh)	U.S. NEL	Canada NEL	Mexico NEL	% of RE total	US Total	Canada Total	Mexico Total	% of ERO Total	US Total	Canada Total	Mexico Total	% of ERO - US Only
2011	WECC		City of Redding	U.S.	1,223,197	1,223,197			0.143%	0.143%	0.000%	0.000%	0.027%	0.027%	0.000%	0.000%	0.031%
2011	WECC		City of Richland	U.S.	882,177	882,177			0.103%	0.103%	0.000%	0.000%	0.019%	0.019%	0.000%	0.000%	0.022%
2011	WECC		City of Roseville	U.S.	798,162	798,162			0.093%	0.093%	0.000%	0.000%	0.018%	0.018%	0.000%	0.000%	0.020%
2011	WECC		City of Shasta Lake	U.S.	184,342	184,342			0.022%	0.022%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.005%
2011	WECC		City of Sumas	U.S.	30,510	30,510			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		City of Tacoma DBA Tacoma Power	U.S.	356	356			0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		City of Tacoma DBA Tacoma Power	U.S.	5,074,707	5,074,707			0.592%	0.592%	0.000%	0.000%	0.112%	0.112%	0.000%	0.000%	0.127%
2011	WECC		City of Troy	U.S.	18,306	18,306			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		City of Williams	U.S.	40,053	40,053			0.005%	0.005%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Clark County Water Resources	U.S.	6,075	6,075			0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Clark Public Utilities	U.S.	4,510,772	4,510,772			0.527%	0.527%	0.000%	0.000%	0.100%	0.100%	0.000%	0.000%	0.113%
2011	WECC		Clatskanie PUD	U.S.	794,783	794,783			0.093%	0.093%	0.000%	0.000%	0.018%	0.018%	0.000%	0.000%	0.020%
2011	WECC		Clearwater Cooperative, Inc	U.S.	166,107	166,107			0.019%	0.019%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.004%
2011	WECC		Clearwater Cooperative, Inc	U.S.	40,060	40,060			0.005%	0.005%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Colorado River Agency-Bureau of Indian Affairs	U.S.	14,673	14,673			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Colorado River Commission of Nevada	U.S.	801,002	801,002			0.094%	0.094%	0.000%	0.000%	0.018%	0.018%	0.000%	0.000%	0.020%
2011	WECC		Colorado Springs Utilities	U.S.	81,611	81,611			0.010%	0.010%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	WECC		Colorado Springs Utilities	U.S.	19,936	19,936			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Columbia Basin Electric Cooperative, Inc.	U.S.	106,648	106,648			0.012%	0.012%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.003%
2011	WECC		Columbia Falls Aluminum Company	U.S.	4,261	4,261			0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Columbia Power Cooperative Association	U.S.	21,326	21,326			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.001%
2011	WECC		Columbia River PUD	U.S.	170,280	170,280			0.020%	0.020%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.004%
2011	WECC		Columbia River PUD	U.S.	321,069	321,069			0.037%	0.037%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.008%
2011	WECC		Columbia Rural Electric Association (REA)	U.S.	306,470	306,470			0.036%	0.036%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.008%
2011	WECC		Consolidated Irrigation District No. 19	U.S.	5,621	5,621			0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Constellation New Energy, Inc.	U.S.	73,225	73,225			0.009%	0.009%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	WECC		Consumers Power, Inc.	U.S.	425,329	425,329			0.050%	0.050%	0.000%	0.000%	0.009%	0.009%	0.000%	0.000%	0.011%
2011	WECC		Coos-Curry Electric Cooperative, Inc	U.S.	358,171	358,171			0.042%	0.042%	0.000%	0.000%	0.008%	0.008%	0.000%	0.000%	0.009%
2011	WECC		Deseret Generation & Transmission Cooperative	U.S.	4,582,559	4,582,559			0.535%	0.535%	0.000%	0.000%	0.101%	0.101%	0.000%	0.000%	0.115%
2011	WECC		Deseret Generation & Transmission Cooperative	U.S.	86,987	86,987			0.010%	0.010%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	WECC		Douglas Electric Cooperative, Inc.	U.S.	96,236	96,236			0.011%	0.011%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	WECC		Douglas Palisades	U.S.	17,936	17,936			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		El Paso Electric Company	U.S.	8,342,238	8,342,238			0.974%	0.974%	0.000%	0.000%	0.184%	0.184%	0.000%	0.000%	0.209%
2011	WECC		Electrical District #2	U.S.	182,634	182,634			0.021%	0.021%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.005%
2011	WECC		Electrical District #2 - Coolidge Generating Station	U.S.	9,066	9,066			0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Electrical Districts 1 & 3	U.S.	668,791	668,791			0.078%	0.078%	0.000%	0.000%	0.015%	0.015%	0.000%	0.000%	0.017%
2011	WECC		Elmhurst Mutual Power & Light Company	U.S.	281,937	281,937			0.033%	0.033%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.007%
2011	WECC		Emerald PUD	U.S.	693,945	693,945			0.081%	0.081%	0.000%	0.000%	0.015%	0.015%	0.000%	0.000%	0.017%
2011	WECC		Energy Northwest	U.S.	26,743	26,743			0.003%	0.003%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Eugene Water & Electric Board	U.S.	2,494,514	2,494,514			0.291%	0.291%	0.000%	0.000%	0.055%	0.055%	0.000%	0.000%	0.062%
2011	WECC		Farmington Electric Utility System	U.S.	1,043,492	1,043,492			0.122%	0.122%	0.000%	0.000%	0.023%	0.023%	0.000%	0.000%	0.026%
2011	WECC		Flathead Electric Cooperative, Inc	U.S.	1,448,399	1,448,399			0.169%	0.169%	0.000%	0.000%	0.032%	0.032%	0.000%	0.000%	0.036%
2011	WECC		Frederickson Power LP	U.S.	5,209	5,209			0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Grand Valley Power	U.S.	228,043	228,043			0.027%	0.027%	0.000%	0.000%	0.005%	0.005%	0.000%	0.000%	0.006%
2011	WECC		Harney Electric Cooperative, Inc.	U.S.	111,061	111,061			0.013%	0.013%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.003%
2011	WECC		Harney Electric Cooperative, Inc.	U.S.	66,827	66,827			0.008%	0.008%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.002%
2011	WECC		Hermiston Power LLC	U.S.	5,921	5,921			0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Holy Cross Energy	U.S.	731,002	731,002			0.085%	0.085%	0.000%	0.000%	0.016%	0.016%	0.000%	0.000%	0.018%
2011	WECC		Hood River Electric Cooperative	U.S.	41,501	41,501			0.005%	0.005%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NEL (MWh)	U.S. NEL	Canada NEL	Mexico NEL	% of RE total	US Total	Canada Total	Mexico Total	% of ERO Total	US Total	Canada Total	Mexico Total	% of ERO - US Only
2011	WECC		Idaho County Light and Power Cooperative Associat	U.S.	57,727	57,727			0.007%	0.007%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Idaho Power Company	U.S.	14,979,668	14,979,668			1.749%	1.749%	0.000%	0.000%	0.331%	0.331%	0.000%	0.000%	0.375%
2011	WECC		Imperial Irrigation District	U.S.	3,598,464	3,598,464			0.420%	0.420%	0.000%	0.000%	0.079%	0.079%	0.000%	0.000%	0.090%
2011	WECC		Inland Power and Light Company	U.S.	467,156	467,156			0.055%	0.055%	0.000%	0.000%	0.010%	0.010%	0.000%	0.000%	0.012%
2011	WECC		Inland Power and Light Company	U.S.	485,239	485,239			0.057%	0.057%	0.000%	0.000%	0.011%	0.011%	0.000%	0.000%	0.012%
2011	WECC		Intermountain Rural Electric Association	U.S.	1,115,860	1,115,860			0.130%	0.130%	0.000%	0.000%	0.025%	0.025%	0.000%	0.000%	0.028%
2011	WECC		Kaiser Aluminum Fabricated Products LLC	U.S.	313,878	313,878			0.037%	0.037%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.008%
2011	WECC		Kootenai Electric Cooperative, Inc.	U.S.	473,760	473,760			0.055%	0.055%	0.000%	0.000%	0.010%	0.010%	0.000%	0.000%	0.012%
2011	WECC		Lakeview Light & Power	U.S.	281,756	281,756			0.033%	0.033%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.007%
2011	WECC		Lane Electric Cooperative, Inc.	U.S.	229,262	229,262			0.027%	0.027%	0.000%	0.000%	0.005%	0.005%	0.000%	0.000%	0.006%
2011	WECC		Las Vegas Valley Water District	U.S.	90,574	90,574			0.011%	0.011%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	WECC		Lincoln County Power District No. 1	U.S.	90,235	90,235			0.011%	0.011%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	WECC		Lincoln Electric Cooperative, Inc.	U.S.	120,259	120,259			0.014%	0.014%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.003%
2011	WECC		Los Angeles Department of Water and Power	U.S.	28,863,039	28,863,039			3.369%	3.369%	0.000%	0.000%	0.638%	0.638%	0.000%	0.000%	0.722%
2011	WECC		Majority Districts	U.S.	669,890	669,890			0.078%	0.078%	0.000%	0.000%	0.015%	0.015%	0.000%	0.000%	0.017%
2011	WECC		Merced Irrigation District	U.S.	454,316	454,316			0.053%	0.053%	0.000%	0.000%	0.010%	0.010%	0.000%	0.000%	0.011%
2011	WECC		Midstate Electric Cooperative, Inc.	U.S.	403,143	403,143			0.047%	0.047%	0.000%	0.000%	0.009%	0.009%	0.000%	0.000%	0.010%
2011	WECC		Mission Valley Power	U.S.	394,767	394,767			0.046%	0.046%	0.000%	0.000%	0.009%	0.009%	0.000%	0.000%	0.010%
2011	WECC		Modern Electric Water Company	U.S.	235,291	235,291			0.027%	0.027%	0.000%	0.000%	0.005%	0.005%	0.000%	0.000%	0.006%
2011	WECC		Modesto Irrigation District	U.S.	2,524,529	2,524,529			0.295%	0.295%	0.000%	0.000%	0.056%	0.056%	0.000%	0.000%	0.063%
2011	WECC		Montana-Dakota Utilities Co.	U.S.	16,940	16,940			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Mt. Wheeler Power	U.S.	531,438	531,438			0.062%	0.062%	0.000%	0.000%	0.012%	0.012%	0.000%	0.000%	0.013%
2011	WECC		Municipal Energy Agency of Nebraska	U.S.	182,998	182,998			0.021%	0.021%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.005%
2011	WECC		Municipal Energy Agency of Nebraska	U.S.	28,470	28,470			0.003%	0.003%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Navajo Tribal Utility Authority	U.S.	44,785	44,785			0.005%	0.005%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Navajo Tribal Utility Authority	U.S.	313,385	313,385			0.037%	0.037%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.008%
2011	WECC		Navopache Electric Cooperative, Inc.	U.S.	436,712	436,712			0.051%	0.051%	0.000%	0.000%	0.010%	0.010%	0.000%	0.000%	0.011%
2011	WECC		Nebraska Public Power Marketing	U.S.	555,674	555,674			0.065%	0.065%	0.000%	0.000%	0.012%	0.012%	0.000%	0.000%	0.014%
2011	WECC		Nespelem Valley Electric Cooperative, Inc.	U.S.	50,524	50,524			0.006%	0.006%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Nevada Power Company dba NV Energy	U.S.	21,639,158	21,639,158			2.526%	2.526%	0.000%	0.000%	0.478%	0.478%	0.000%	0.000%	0.541%
2011	WECC		Noble Americas Energy Solutions, LLC	U.S.	952,212	952,212			0.111%	0.111%	0.000%	0.000%	0.021%	0.021%	0.000%	0.000%	0.024%
2011	WECC		Northern Lights, Inc.	U.S.	36,281	36,281			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Northern Lights, Inc.	U.S.	304,368	304,368			0.036%	0.036%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.008%
2011	WECC		Northern Wasco County PUD	U.S.	572,298	572,298			0.067%	0.067%	0.000%	0.000%	0.013%	0.013%	0.000%	0.000%	0.014%
2011	WECC		NorthWestern Corp. dba NorthWestern Energy, LLC	U.S.	9,000,254	9,000,254			1.051%	1.051%	0.000%	0.000%	0.199%	0.199%	0.000%	0.000%	0.225%
2011	WECC		NorthWestern Corp. dba NorthWestern Energy, LLC	U.S.	305,408	305,408			0.036%	0.036%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.008%
2011	WECC		Ohop Mutual Light Company	U.S.	88,819	88,819			0.010%	0.010%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	WECC		Orcas Power and Light Cooperative	U.S.	219,124	219,124			0.026%	0.026%	0.000%	0.000%	0.005%	0.005%	0.000%	0.000%	0.005%
2011	WECC		Operations Office	U.S.	194,777	194,777			0.023%	0.023%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.005%
2011	WECC		Oregon Trail Electric Consumers Cooperative, Inc.	U.S.	333,948	333,948			0.039%	0.039%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.008%
2011	WECC		Overton Power District No. 5	U.S.	378,808	378,808			0.044%	0.044%	0.000%	0.000%	0.008%	0.008%	0.000%	0.000%	0.009%
2011	WECC		PacifiCorp	U.S.	58,032	58,032			0.007%	0.007%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		PacifiCorp	U.S.	2,095	2,095			0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		PacifiCorp	U.S.	47,858,167	47,858,167			5.587%	5.587%	0.000%	0.000%	1.057%	1.057%	0.000%	0.000%	1.198%
2011	WECC		PacifiCorp	U.S.	1,793	1,793			0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		PacifiCorp	U.S.	3,797	3,797			0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		PacifiCorp West (PACW)	U.S.	20,883,821	20,883,821			2.438%	2.438%	0.000%	0.000%	0.461%	0.461%	0.000%	0.000%	0.523%
2011	WECC		Page Electric Utility	U.S.	14,926	14,926			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Parkland Light and Water Company	U.S.	123,577	123,577			0.014%	0.014%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.003%
2011	WECC		Pend Oreille County PUD No. 1	U.S.	998,876	998,876			0.117%	0.117%	0.000%	0.000%	0.022%	0.022%	0.000%	0.000%	0.025%
2011	WECC		Peninsula Light Company, Inc.	U.S.	620,196	620,196			0.072%	0.072%	0.000%	0.000%	0.014%	0.014%	0.000%	0.000%	0.016%
2011	WECC		Platte River Power Authority	U.S.	3,250,442	3,250,442			0.379%	0.379%	0.000%	0.000%	0.072%	0.072%	0.000%	0.000%	0.081%
2011	WECC		Port of Seattle - Seattle-Tacoma International Airpo	U.S.	144,959	144,959			0.017%	0.017%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.004%

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NEL (MWh)	U.S. NEL	Canada NEL	Mexico NEL	% of RE total	US Total	Canada Total	Mexico Total	% of ERO Total	US Total	Canada Total	Mexico Total	% of ERO - US Only
2011	WECC		Port Townsend Paper Corporation	U.S.	202,411	202,411			0.024%	0.024%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.005%
2011	WECC		Portland General Electric Company	U.S.	47,576	47,576			0.006%	0.006%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Portland General Electric Company	U.S.	19,064,923	19,064,923			2.226%	2.226%	0.000%	0.000%	0.421%	0.421%	0.000%	0.000%	0.477%
2011	WECC		Public Service Company of Colorado (Xcel)	U.S.	31,503,951	31,503,951			3.678%	3.678%	0.000%	0.000%	0.696%	0.696%	0.000%	0.000%	0.788%
2011	WECC		Public Service Company of Colorado (Xcel)	U.S.	172,066	172,066			0.020%	0.020%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.004%
2011	WECC		Public Service Company of New Mexico	U.S.	10,891,068	10,891,068			1.271%	1.271%	0.000%	0.000%	0.241%	0.241%	0.000%	0.000%	0.273%
2011	WECC		Public Utility District No. 1 of Chelan County	U.S.	3,782,502	3,782,502			0.442%	0.442%	0.000%	0.000%	0.084%	0.084%	0.000%	0.000%	0.095%
2011	WECC		PUD No. 1 of Asotin County	U.S.	4,480	4,480			0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		PUD No. 1 of Asotin County	U.S.	314	314			0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		PUD No. 1 of Benton County	U.S.	1,702,301	1,702,301			0.199%	0.199%	0.000%	0.000%	0.038%	0.038%	0.000%	0.000%	0.043%
2011	WECC		PUD No. 1 of Clallam County	U.S.	695,379	695,379			0.081%	0.081%	0.000%	0.000%	0.015%	0.015%	0.000%	0.000%	0.017%
2011	WECC		PUD No. 1 of Cowlitz County	U.S.	5,114,848	5,114,848			0.597%	0.597%	0.000%	0.000%	0.113%	0.113%	0.000%	0.000%	0.128%
2011	WECC		PUD No. 1 of Cowlitz County	U.S.	4,788	4,788			0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		PUD No. 1 of Douglas County	U.S.	9,031	9,031			0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		PUD No. 1 of Douglas County	U.S.	1,435,488	1,435,488			0.168%	0.168%	0.000%	0.000%	0.032%	0.032%	0.000%	0.000%	0.036%
2011	WECC		PUD No. 1 of Ferry County	U.S.	107,730	107,730			0.013%	0.013%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.003%
2011	WECC		PUD No. 1 of Franklin County	U.S.	1,025,213	1,025,213			0.120%	0.120%	0.000%	0.000%	0.023%	0.023%	0.000%	0.000%	0.026%
2011	WECC		PUD No. 1 of Grays Harbor	U.S.	1,184,510	1,184,510			0.138%	0.138%	0.000%	0.000%	0.026%	0.026%	0.000%	0.000%	0.030%
2011	WECC		PUD No. 1 of Kittitas County	U.S.	70,436	70,436			0.008%	0.008%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	WECC		PUD No. 1 of Kittitas County	U.S.	7,881	7,881			0.001%	0.000%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		PUD No. 1 of Kittitas County	U.S.	16,993	16,993			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		PUD No. 1 of Klickitat County	U.S.	264,286	264,286			0.031%	0.000%	0.000%	0.031%	0.006%	0.006%	0.000%	0.000%	0.007%
2011	WECC		PUD No. 1 of Lewis County	U.S.	980,372	980,372			0.114%	0.114%	0.000%	0.000%	0.022%	0.022%	0.000%	0.000%	0.025%
2011	WECC		PUD No. 1 of Mason County	U.S.	80,885	80,885			0.009%	0.009%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	WECC		PUD No. 1 of Skamania County	U.S.	136,771	136,771			0.016%	0.016%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.003%
2011	WECC		PUD No. 1 of Snohomish County	U.S.	7,195,316	7,195,316			0.840%	0.840%	0.000%	0.000%	0.159%	0.159%	0.000%	0.000%	1.800%
2011	WECC		PUD No. 1 of Wahkiakum County	U.S.	45,538	45,538			0.005%	0.005%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		PUD No. 1 of Whatcom County	U.S.	219,958	219,958			0.026%	0.000%	0.026%	0.000%	0.005%	0.000%	0.005%	0.000%	0.006%
2011	WECC		PUD No. 1 of Whatcom County	U.S.	10,934	10,934			0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		PUD No. 2 of Grant County	U.S.	85,713	85,713			0.010%	0.000%	0.000%	0.010%	0.002%	0.000%	0.000%	0.002%	0.002%
2011	WECC		PUD No. 2 of Grant County	U.S.	48,941	48,941			0.006%	0.006%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		PUD No. 2 of Grant County	U.S.	3,954,105	3,954,105			0.462%	0.462%	0.000%	0.000%	0.087%	0.087%	0.000%	0.000%	0.099%
2011	WECC		PUD No. 2 of Pacific County	U.S.	311,816	311,816			0.036%	0.036%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.008%
2011	WECC		PUD No. 3 of Mason County	U.S.	701,214	701,214			0.082%	0.082%	0.000%	0.000%	0.015%	0.015%	0.000%	0.000%	0.018%
2011	WECC		Puget Sound Energy, Inc.	U.S.	24,784,274	24,784,274			2.893%	2.893%	0.000%	0.000%	0.548%	0.548%	0.000%	0.000%	6.200%
2011	WECC		Rocky Mountain Generation Cooperative, Inc.	U.S.	33,055	33,055			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Sacramento Municipal Utility District	U.S.	11,194,192	11,194,192			1.307%	1.307%	0.000%	0.000%	0.247%	0.247%	0.000%	0.000%	2.800%
2011	WECC		Salem Electric	U.S.	330,465	330,465			0.039%	0.039%	0.000%	0.000%	0.007%	0.007%	0.000%	0.000%	0.008%
2011	WECC		Salt River Project	U.S.	28,515,865	28,515,865			3.329%	3.329%	0.000%	0.000%	0.630%	0.630%	0.000%	0.000%	7.140%
2011	WECC		San Carlos Indian Irrigation Project	U.S.	112	112			0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Seattle City Light	U.S.	10,188,883	10,188,883			1.189%	1.189%	0.000%	0.000%	0.225%	0.225%	0.000%	0.000%	2.255%
2011	WECC		Sierra Pacific Power Company dba NV Energy	U.S.	8,734,530	8,734,530			1.020%	1.020%	0.000%	0.000%	0.193%	0.193%	0.000%	0.000%	2.195%
2011	WECC		Southern Montana Electric Generation & Transmiss	U.S.	188,819	188,819			0.022%	0.022%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.005%
2011	WECC		Southern Montana Electric Generation & Transmiss	U.S.	697,891	697,891			0.081%	0.081%	0.000%	0.000%	0.015%	0.015%	0.000%	0.000%	0.017%
2011	WECC		Southern Nevada Water Authority	U.S.	790,997	790,997			0.092%	0.092%	0.000%	0.000%	0.017%	0.017%	0.000%	0.000%	0.020%
2011	WECC		Southwest Transmission Cooperative, Inc.	U.S.	2,691,777	2,691,777			0.314%	0.314%	0.000%	0.000%	0.059%	0.059%	0.000%	0.000%	0.067%
2011	WECC		Springfield Utility Board	U.S.	847,249	847,249			0.099%	0.099%	0.000%	0.000%	0.019%	0.019%	0.000%	0.000%	0.021%
2011	WECC		Surprise Valley Electrification Corporation	U.S.	30,871	30,871			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Tanner Electric Cooperative	U.S.	96,583	96,583			0.011%	0.011%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	WECC		The Incorporated County of Los Alamos	U.S.	368,884	368,884			0.043%	0.043%	0.000%	0.000%	0.008%	0.008%	0.000%	0.000%	0.009%
2011	WECC		Tillamook People's Utility District	U.S.	377,963	377,963			0.044%	0.044%	0.000%	0.000%	0.008%	0.008%	0.000%	0.000%	0.009%

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NEL (MWh)	U.S. NEL	Canada NEL	Mexico NEL	% of RE total	US Total	Canada Total	Mexico Total	% of ERO Total	US Total	Canada Total	Mexico Total	% of ERO - US Only
2011	WECC		Tohono O'Odham Utility Authority	U.S.	69,071	69,071			0.008%	0.008%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	WECC		Town of Center	U.S.	10,472	10,472			0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Town of Coulee	U.S.	17,608	17,608			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Town of Eatonville	U.S.	30,780	30,780			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Town of Fredonia	U.S.	1,557	1,557			0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Town of Steilacoom	U.S.	42,406	42,406			0.005%	0.005%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Town of Wickenburg	U.S.	28,469	28,469			0.003%	0.003%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Tri-State Generation & Transmission Assoc. Inc - Rel	U.S.	2,071,082	2,071,082			0.242%	0.242%	0.000%	0.000%	0.046%	0.046%	0.000%	0.000%	0.052%
2011	WECC		Tri-State Generation & Transmission Assoc. Inc - Rel	U.S.	44,085	44,085			0.005%	0.005%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Tri-State Generation & Transmission Assoc. Inc - Rel	U.S.	33,358	33,358			0.004%	0.004%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		Tri-State Generation & Transmission Association, In	U.S.	2,568,574	2,568,574			0.300%	0.300%	0.000%	0.000%	0.057%	0.057%	0.000%	0.000%	0.064%
2011	WECC		Truckee Donner Public Utility District	U.S.	151,988	151,988			0.018%	0.018%	0.000%	0.000%	0.003%	0.003%	0.000%	0.000%	0.004%
2011	WECC		Tucson Electric Power Company	U.S.	13,594,185	13,594,185			1.587%	1.587%	0.000%	0.000%	0.300%	0.300%	0.000%	0.000%	0.340%
2011	WECC		Turlock Irrigation District	U.S.	2,044,912	2,044,912			0.239%	0.239%	0.000%	0.000%	0.045%	0.045%	0.000%	0.000%	0.051%
2011	WECC		U.S. Army Yuma Proving Ground	U.S.	4,490	4,490			0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		U.S. BOR Columbia Basin	U.S.	28,687	28,687			0.003%	0.003%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		U.S. BOR East Greenacres (Rathdrum)	U.S.	3,566	3,566			0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		U.S. Bor Spokane Indian Development`	U.S.	3,299	3,299			0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		U.S. BOR The Dalles Project	U.S.	16,327	16,327			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		U.S. DOE National Energy Technology Laboratory	U.S.	4,721	4,721			0.001%	0.001%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Umatilla Electric Cooperative Association	U.S.	969,290	969,290			0.113%	0.113%	0.000%	0.000%	0.021%	0.021%	0.000%	0.000%	0.024%
2011	WECC		Unit B Irrigation District	U.S.	23	23			0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		US Air Force Base, Fairchild	U.S.	49,952	49,952			0.006%	0.006%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		US Dept of Energy - Kirtland AFB	U.S.	423,846	423,846			0.049%	0.049%	0.000%	0.000%	0.009%	0.009%	0.000%	0.000%	0.011%
2011	WECC		USN Naval Station, Bremerton	U.S.	257,040	257,040			0.030%	0.030%	0.000%	0.000%	0.006%	0.006%	0.000%	0.000%	0.006%
2011	WECC		USN Naval Station, Everett	U.S.	13,257	13,257			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		USN Submarine Base, Bangor	U.S.	180,858	180,858			0.021%	0.021%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.005%
2011	WECC		Valley Electric Association, Inc.	U.S.	413,528	413,528			0.048%	0.048%	0.000%	0.000%	0.009%	0.009%	0.000%	0.000%	0.010%
2011	WECC		Vera Water and Power	U.S.	231,952	231,952			0.027%	0.027%	0.000%	0.000%	0.005%	0.005%	0.000%	0.000%	0.006%
2011	WECC		Vigilante Electric Cooperative, Inc.	U.S.	16,140	16,140			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Wasco Electric Cooperative	U.S.	95,917	95,917			0.011%	0.011%	0.000%	0.000%	0.002%	0.002%	0.000%	0.000%	0.002%
2011	WECC		Wells Rural Electric Cooperative	U.S.	645,809	645,809			0.075%	0.075%	0.000%	0.000%	0.014%	0.014%	0.000%	0.000%	0.016%
2011	WECC		Wellton-Mohawk Irrigation & Drainage District	U.S.	19,234	19,234			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		West Oregon Electric Cooperative, Inc.	U.S.	54,937	54,937			0.006%	0.006%	0.000%	0.000%	0.001%	0.001%	0.000%	0.000%	0.001%
2011	WECC		West Oregon Electric Cooperative, Inc.	U.S.	13,348	13,348			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Western Area Power - Loveland, CO	U.S.	342,166	342,166			0.040%	0.040%	0.000%	0.000%	0.008%	0.008%	0.000%	0.000%	0.009%
2011	WECC		Western Area Power - Loveland, CO	U.S.	246,234	246,234			0.029%	0.029%	0.000%	0.000%	0.005%	0.005%	0.000%	0.000%	0.006%
2011	WECC		Western Area Power Administration - CRSP	U.S.	1,760,142	1,760,142			0.205%	0.205%	0.000%	0.000%	0.039%	0.039%	0.000%	0.000%	0.044%
2011	WECC		Western Area Power Administration - Sierra Nevada	U.S.	1,528,329	1,528,329			0.178%	0.178%	0.000%	0.000%	0.034%	0.034%	0.000%	0.000%	0.038%
2011	WECC		Western Area Power Administration-Desert Southw	U.S.	2,694,858	2,694,858			0.315%	0.315%	0.000%	0.000%	0.060%	0.060%	0.000%	0.000%	0.067%
2011	WECC		Western Area Power Administration-Upper Great Pl	U.S.	191,552	191,552			0.022%	0.022%	0.000%	0.000%	0.004%	0.004%	0.000%	0.000%	0.005%
2011	WECC		Western Area Power Administration-Upper Great Pl	U.S.	1,474,154	1,474,154			0.172%	0.172%	0.000%	0.000%	0.033%	0.033%	0.000%	0.000%	0.037%
2011	WECC		Western Area Power Administration-Upper Great Pl	U.S.	214,398	214,398			0.025%	0.025%	0.000%	0.000%	0.005%	0.005%	0.000%	0.000%	0.005%
2011	WECC		Wyoming Municipal Power Agency	U.S.	7,389,913	7,389,913			0.863%	0.863%	0.000%	0.000%	0.163%	0.163%	0.000%	0.000%	0.185%
2011	WECC		Yakama Power	U.S.	19,439	19,439			0.002%	0.002%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Yampa Valley Electric Association	U.S.	585,674	585,674			0.068%	0.068%	0.000%	0.000%	0.013%	0.013%	0.000%	0.000%	0.015%
2011	WECC		Yuma Irrigation District	U.S.	3,091	3,091			0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
2011	WECC		Yuma-Mesa Irrigation District	U.S.	152	152			0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%	0.000%
TOTAL WECC					856,656,372	726,309,024	119,305,906	11,041,442	100.000%	84.717%	13.954%	1.330%	18.925%	16.039%	2.641%	0.246%	18.175%
TOTAL ERO					4,526,616,128	3,996,240,765	519,333,921	11,041,442	800.000%	714.621%	84.049%	1.330%	100.000%	88.276%	11.478%	0.246%	100.000%

Data Year	Regional Entity	ID	Entity	Country	Total NEL (MWh)	U.S. NEL	Canada NEL	Mexico NEL	% of RE total	US Total	Canada Total	Mexico Total	% of ERO Total	US Total	Canada Total	Mexico Total	% of ERO - US Only
Summary by Regional Entity					Total NEL (MWh)	U.S. NEL	Canada NEL	Mexico NEL									
2011	FRCC				223,901,932	223,901,932	-	-	100.000%	100.000%	0.000%	0.000%	4.946%	4.946%	0.000%	0.000%	5.603%
2011	MRO				282,953,703	238,655,688	44,298,015	-	100.000%	84.344%	15.656%	0.000%	6.251%	5.272%	0.979%	0.000%	5.972%
2011	NPCC				653,432,000	297,702,000	355,730,000	-	100.000%	45.560%	54.440%	0.000%	14.435%	6.577%	7.859%	0.000%	7.450%
2011	RFC				913,288,560	913,288,560	-	-	100.000%	100.000%	0.000%	0.000%	20.176%	20.176%	0.000%	0.000%	22.854%
2011	SERC				1,043,110,079	1,043,110,079	-	-	100.000%	100.000%	0.000%	0.000%	23.044%	23.044%	0.000%	0.000%	26.102%
2011	SPP				218,273,305	218,273,305	-	-	100.000%	100.000%	0.000%	0.000%	4.822%	4.822%	0.000%	0.000%	5.462%
2011	TRE				335,000,176	335,000,176	-	-	100.000%	100.000%	0.000%	0.000%	7.401%	7.401%	0.000%	0.000%	8.383%
2011	WECC				856,656,372	726,309,024	119,305,906	11,041,442	100.000%	84.717%	13.954%	1.330%	18.925%	16.039%	2.641%	0.246%	18.175%
Total					4,526,616,128	3,996,240,765	519,333,921	11,041,442	800.000%	714.621%	84.049%	1.330%	100.000%	88.276%	11.478%	0.246%	100.000%

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total ERO Assessments (NERC, RE & WIRAB Costs)				Total NERC Assessments				Total Regional Entity Assessments (Including WIRAB Assessments)			
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total
2011	FRCC	1074	Alachua, City of	U.S.	4,786	4,786	-	-	1,382	1,382	-	-	3,404	3,404	-	-
2011	FRCC	1075	Bartow, City of	U.S.	10,368	10,368	-	-	2,994	2,994	-	-	7,374	7,374	-	-
2011	FRCC	1076	Chattahoochee, City of	U.S.	1,535	1,535	-	-	443	443	-	-	1,092	1,092	-	-
2011	FRCC	1077	Florida Keys Electric Cooperative Assn	U.S.	26,153	26,153	-	-	7,553	7,553	-	-	18,600	18,600	-	-
2011	FRCC	1078	Florida Power & Light Co.	U.S.	4,126,065	4,126,065	-	-	1,191,557	1,191,557	-	-	2,934,508	2,934,508	-	-
2011	FRCC	1079	Florida Public Utilities Company	U.S.	15,153	15,153	-	-	4,376	4,376	-	-	10,777	10,777	-	-
2011	FRCC	1080	Gainesville Regional Utilities	U.S.	68,176	68,176	-	-	19,688	19,688	-	-	48,488	48,488	-	-
2011	FRCC	1081	Homestead, City of	U.S.	18,520	18,520	-	-	5,348	5,348	-	-	13,172	13,172	-	-
2011	FRCC	1082	JEA	U.S.	470,489	470,489	-	-	135,871	135,871	-	-	334,617	334,617	-	-
2011	FRCC	1083	Lakeland Electric	U.S.	108,240	108,240	-	-	31,259	31,259	-	-	76,982	76,982	-	-
2011	FRCC	1626	Lee County Electric Cooperative, Inc	U.S.	44,071	44,071	-	-	12,727	12,727	-	-	31,344	31,344	-	-
2011	FRCC	1084	Mount Dora, City of	U.S.	3,394	3,394	-	-	980	980	-	-	2,414	2,414	-	-
2011	FRCC	1085	New Smyrna Beach, Utilities Commission of	U.S.	14,479	14,479	-	-	4,181	4,181	-	-	10,298	10,298	-	-
2011	FRCC	1086	Orlando Utilities Commission	U.S.	211,576	211,576	-	-	61,101	61,101	-	-	150,475	150,475	-	-
2011	FRCC	1087	Progress Energy Florida	U.S.	1,498,070	1,498,070	-	-	432,624	432,624	-	-	1,065,446	1,065,446	-	-
2011	FRCC	1088	Quincy, City of	U.S.	5,347	5,347	-	-	1,544	1,544	-	-	3,803	3,803	-	-
2011	FRCC	1089	Reedy Creek Improvement District	U.S.	45,197	45,197	-	-	13,052	13,052	-	-	32,145	32,145	-	-
2011	FRCC	1090	St. Cloud, City of (OUC)	U.S.	22,075	22,075	-	-	6,375	6,375	-	-	15,700	15,700	-	-
2011	FRCC	1091	Tallahassee, City of	U.S.	104,724	104,724	-	-	30,243	30,243	-	-	74,481	74,481	-	-
2011	FRCC	1092	Tampa Electric Company	U.S.	718,570	718,570	-	-	207,514	207,514	-	-	511,056	511,056	-	-
2011	FRCC	1603	City of Vero Beach	U.S.	27,724	27,724	-	-	8,006	8,006	-	-	19,718	19,718	-	-
2011	FRCC	1093	Wauchula, City of	U.S.	2,357	2,357	-	-	681	681	-	-	1,676	1,676	-	-
2011	FRCC	1094	Williston, City of	U.S.	1,241	1,241	-	-	358	358	-	-	883	883	-	-
2011	FRCC	1095	Winter Park, City of	U.S.	16,548	16,548	-	-	4,779	4,779	-	-	11,769	11,769	-	-
2011	FRCC	1072	Florida Municipal Power Agency	U.S.	225,312	225,312	-	-	65,067	65,067	-	-	160,245	160,245	-	-
2011	FRCC	1073	Seminole Electric Cooperative	U.S.	587,035	587,035	-	-	169,528	169,528	-	-	417,506	417,506	-	-
TOTAL FRCC					8,377,204	8,377,204	-	-	2,419,233	2,419,233	-	-	5,957,971	5,957,971	-	-
2011	MRO	1199	Basin Electric Power Cooperative	U.S.	554,837	554,837	-	-	140,893	140,893	-	-	413,944	413,944	-	-
2011	MRO	1201	Central Iowa Power Cooperative (CIPCO)	U.S.	120,347	120,347	-	-	30,560	30,560	-	-	89,787	89,787	-	-
2011	MRO	1204	Corn Belt Power Cooperative	U.S.	76,342	76,342	-	-	19,386	19,386	-	-	56,956	56,956	-	-
2011	MRO	1207	Dairyland Power Cooperative	U.S.	226,678	226,678	-	-	57,562	57,562	-	-	169,117	169,117	-	-
2011	MRO	1210	Great River Energy	U.S.	581,097	581,097	-	-	147,561	147,561	-	-	433,536	433,536	-	-
2011	MRO	1222	Minnkota Power Cooperative, Inc.	U.S.	174,151	174,151	-	-	44,223	44,223	-	-	129,928	129,928	-	-
2011	MRO	1230	Nebraska Public Power District	U.S.	551,218	551,218	-	-	139,974	139,974	-	-	411,244	411,244	-	-
2011	MRO	1232	Omaha Public Power District	U.S.	486,677	486,677	-	-	123,585	123,585	-	-	363,093	363,093	-	-
2011	MRO	1237	Southern Montana Generation and Transmission	U.S.	177	177	-	-	45	45	-	-	132	132	-	-
2011	MRO	1240	Western Area Power Administration (UM)	U.S.	386,913	386,913	-	-	98,251	98,251	-	-	288,662	288,662	-	-
2011	MRO	1239	Western Area Power Administration (LM)	U.S.	5,467	5,467	-	-	1,388	1,388	-	-	4,079	4,079	-	-
2011	MRO	1217	Manitoba Hydro	CAN	993,173	-	993,173	-	262,505	-	262,505	-	730,668	-	730,668	-
2011	MRO	1235	SaskPower	CAN	946,068	-	946,068	-	250,055	-	250,055	-	696,013	-	696,013	-
2011	MRO	1195	Alliant Energy (Alliant East - WPL & Alliant West IPL)	U.S.	1,234,916	1,234,916	-	-	313,589	313,589	-	-	921,327	921,327	-	-
2011	MRO	1216	Madison, Gas and Electric	U.S.	150,087	150,087	-	-	38,112	38,112	-	-	111,974	111,974	-	-
2011	MRO	1220	MidAmerican Energy Company	U.S.	1,195,035	1,195,035	-	-	303,462	303,462	-	-	891,573	891,573	-	-
2011	MRO	1221	Minnesota Power	U.S.	568,164	568,164	-	-	144,277	144,277	-	-	423,887	423,887	-	-
2011	MRO	1226	Montana-Dakota Utilities Co.	U.S.	119,621	119,621	-	-	30,376	30,376	-	-	89,245	89,245	-	-
2011	MRO	1231	NorthWestern Energy	U.S.	64,791	64,791	-	-	16,453	16,453	-	-	48,339	48,339	-	-
2011	MRO	1233	Otter Tail Power Company	U.S.	187,036	187,036	-	-	47,495	47,495	-	-	139,541	139,541	-	-
2011	MRO	1243	Integrus Energy Group (WPS and UPPCO)	U.S.	581,538	581,538	-	-	147,673	147,673	-	-	433,865	433,865	-	-
2011	MRO	1244	Xcel Energy Company (NSP)	U.S.	1,988,578	1,988,578	-	-	504,970	504,970	-	-	1,483,607	1,483,607	-	-
2011	MRO	1196	Ames Municipal Electric System	U.S.	33,439	33,439	-	-	8,491	8,491	-	-	24,947	24,947	-	-
2011	MRO	1604	Atlantic Municipal Utilities	U.S.	3,053	3,053	-	-	775	775	-	-	2,278	2,278	-	-
2011	MRO	1476	Badger Power Marketing Authority of Wisconsin, In	U.S.	17,782	17,782	-	-	4,516	4,516	-	-	13,267	13,267	-	-
2011	MRO	1200	Cedar Falls Municipal Utilities	U.S.	22,335	22,335	-	-	5,672	5,672	-	-	16,664	16,664	-	-
2011	MRO	1477	Central Minnesota Municipal Power Agency (CMMP	U.S.	20,387	20,387	-	-	5,177	5,177	-	-	15,210	15,210	-	-
2011	MRO	1605	City of Pella	U.S.	8,556	8,556	-	-	2,173	2,173	-	-	6,384	6,384	-	-
2011	MRO	1203	Escanaba Municipal Electric Utility	U.S.	6,582	6,582	-	-	1,671	1,671	-	-	4,911	4,911	-	-
2011	MRO	1205	Falls City Water & Light Department	U.S.	2,434	2,434	-	-	618	618	-	-	1,816	1,816	-	-
2011	MRO	1206	Fremont Department of Utilities	U.S.	18,937	18,937	-	-	4,809	4,809	-	-	14,129	14,129	-	-
2011	MRO	1208	Geneseo Municipal Utilities	U.S.	2,898	2,898	-	-	736	736	-	-	2,162	2,162	-	-
2011	MRO	1209	Grand Island Utilities Department	U.S.	32,292	32,292	-	-	8,200	8,200	-	-	24,092	24,092	-	-

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total ERO Assessments (NERC, RE & WIRAB Costs)				Total NERC Assessments				Total Regional Entity Assessments (Including WIRAB Assessments)			
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total
2011	MRO	1606	Harlan Municipal Utilities	U.S.	1,040	1,040	-	-	264	264	-	-	776	776	-	-
2011	MRO	1211	Hastings Utilities	U.S.	18,530	18,530	-	-	4,705	4,705	-	-	13,824	13,824	-	-
2011	MRO	1212	Heartland Consumers Power District	U.S.	36,670	36,670	-	-	9,312	9,312	-	-	27,358	27,358	-	-
2011	MRO	1213	Hutchinson Utilities Commission	U.S.	13,028	13,028	-	-	3,308	3,308	-	-	9,719	9,719	-	-
2011	MRO	1215	Lincoln Electric System	U.S.	138,781	138,781	-	-	35,241	35,241	-	-	103,540	103,540	-	-
2011	MRO	1218	Manitowoc Public Utilities	U.S.	23,150	23,150	-	-	5,879	5,879	-	-	17,271	17,271	-	-
2011	MRO	1223	Missouri River Energy Services	U.S.	96,378	96,378	-	-	24,474	24,474	-	-	71,904	71,904	-	-
2011	MRO	1224	MN Municipal Power Agency (MMPA)	U.S.	62,680	62,680	-	-	15,917	15,917	-	-	46,764	46,764	-	-
2011	MRO	1607	Montezuma Municipal Light & Power	U.S.	1,511	1,511	-	-	384	384	-	-	1,127	1,127	-	-
2011	MRO	1227	Municipal Energy Agency of Nebraska	U.S.	50,055	50,055	-	-	12,711	12,711	-	-	37,344	37,344	-	-
2011	MRO	1228	Muscatine Power and Water	U.S.	37,898	37,898	-	-	9,624	9,624	-	-	28,274	28,274	-	-
2011	MRO	1229	Nebraska City Utilities	U.S.	7,568	7,568	-	-	1,922	1,922	-	-	5,646	5,646	-	-
2011	MRO	1234	Rochester Public Utilities	U.S.	384	384	-	-	97	97	-	-	286	286	-	-
2011	MRO	1236	Southern Minnesota Municipal Power Agency	U.S.	127,602	127,602	-	-	32,403	32,403	-	-	95,199	95,199	-	-
2011	MRO	1241	Willmar Municipal Utilities	U.S.	11,464	11,464	-	-	2,911	2,911	-	-	8,553	8,553	-	-
2011	MRO	1242	Wisconsin Public Power, Inc. (East and West regions)	U.S.	234,518	234,518	-	-	59,552	59,552	-	-	174,966	174,966	-	-
TOTAL MRO					12,222,863	10,283,622	1,939,241	-	3,123,936	2,611,375	512,561	-	9,098,927	7,672,246	1,426,681	-
2011	NPCC	1336	New England	U.S.	4,820,460	4,820,460	-	-	1,447,974	1,447,974	-	-	3,372,486	3,372,486	-	-
2011	NPCC	1339	New York	U.S.	5,816,315	5,816,315	-	-	1,747,110	1,747,110	-	-	4,069,205	4,069,205	-	-
2011	NPCC	1337	Ontario	Canada	2,786,712	-	2,786,712	-	1,035,450	-	1,035,450	-	1,751,262	-	1,751,262	-
2011	NPCC	1341	Quebec	Canada	4,270,497	-	4,270,497	-	1,509,375	-	1,509,375	-	2,761,122	-	2,761,122	-
2011	NPCC	1338	New Brunswick	Canada	269,567	-	269,567	-	100,162	-	100,162	-	169,405	-	169,405	-
2011	NPCC	1340	Nova Scotia	Canada	364,074	-	364,074	-	135,289	-	135,289	-	228,784	-	228,784	-
TOTAL NPCC					18,327,625	10,636,775	7,690,849	-	5,975,361	3,195,085	2,780,276	-	12,352,264	7,441,691	4,910,573	-
2011	RFC	1104	Bay City	U.S.	8,756	8,756	-	-	3,594	3,594	-	-	5,162	5,162	-	-
2011	RFC	1102	Cannelton Utilities	U.S.	432	432	-	-	177	177	-	-	254	254	-	-
2011	RFC	1105	City of Chelsea	U.S.	2,572	2,572	-	-	1,055	1,055	-	-	1,516	1,516	-	-
2011	RFC	1106	City of Crosswell	U.S.	1,025	1,025	-	-	421	421	-	-	605	605	-	-
2011	RFC	1108	City of Eaton Rapids	U.S.	2,564	2,564	-	-	1,052	1,052	-	-	1,512	1,512	-	-
2011	RFC	1111	City of Hart	U.S.	1,221	1,221	-	-	501	501	-	-	720	720	-	-
2011	RFC	1490	City of Lansing	U.S.	58,620	58,620	-	-	24,059	24,059	-	-	34,561	34,561	-	-
2011	RFC	1112	City of Marquette Board of Light & Power	U.S.	8,696	8,696	-	-	3,569	3,569	-	-	5,127	5,127	-	-
2011	RFC	1114	City of Portland	U.S.	944	944	-	-	388	388	-	-	557	557	-	-
2011	RFC	1116	City of St. Louis	U.S.	1,023	1,023	-	-	420	420	-	-	603	603	-	-
2011	RFC	1118	City of Wyandotte	U.S.	4,801	4,801	-	-	1,970	1,970	-	-	2,830	2,830	-	-
2011	RFC	1120	Cloverland Electric Cooperative	U.S.	23,166	23,166	-	-	9,508	9,508	-	-	13,658	13,658	-	-
2011	RFC	1122	CMS ERM Michigan LLC	U.S.	5,085	5,085	-	-	2,087	2,087	-	-	2,998	2,998	-	-
2011	RFC	1124	Constellation New Energy (MECS-CONS)	U.S.	33,969	33,969	-	-	13,942	13,942	-	-	20,027	20,027	-	-
2011	RFC	1123	Constellation New Energy (MECS-DET)	U.S.	31,676	31,676	-	-	13,001	13,001	-	-	18,676	18,676	-	-
2011	RFC	1126	Consumers Energy Company	U.S.	884,043	884,043	-	-	362,833	362,833	-	-	521,210	521,210	-	-
2011	RFC	1128	Detroit Edison Company	U.S.	1,192,777	1,192,777	-	-	489,545	489,545	-	-	703,232	703,232	-	-
2011	RFC	1166	Duke Energy Indiana	U.S.	799,317	799,317	-	-	328,059	328,059	-	-	471,257	471,257	-	-
2011	RFC	1135	Ferdinand Municipal Light & Water	U.S.	1,090	1,090	-	-	447	447	-	-	643	643	-	-
2011	RFC		FirstEnergy Solutions (MECS-DET)	U.S.	580	580	-	-	238	238	-	-	342	342	-	-
2011	RFC	1549	FirstEnergy Solutions (MECS-DET)	U.S.	52,918	52,918	-	-	21,719	21,719	-	-	31,199	31,199	-	-
2011	RFC	1612	Glacial Energy (MECS-DET)	U.S.	12,235	12,235	-	-	5,021	5,021	-	-	7,213	7,213	-	-
2011	RFC	1144	Holland Board of Public Works	U.S.	20,836	20,836	-	-	8,552	8,552	-	-	12,285	12,285	-	-
2011	RFC	1145	Hoosier Energy	U.S.	191,035	191,035	-	-	78,406	78,406	-	-	112,630	112,630	-	-
2011	RFC	1148	Indiana Municipal Power Agency (DUKE CIN)	U.S.	77,761	77,761	-	-	31,915	31,915	-	-	45,846	45,846	-	-
2011	RFC	1485	Indiana Municipal Power Agency (NIPSCO)	U.S.	11,032	11,032	-	-	4,528	4,528	-	-	6,504	6,504	-	-
2011	RFC	1486	Indiana Municipal Power Agency (SIGE)	U.S.	15,729	15,729	-	-	6,455	6,455	-	-	9,273	9,273	-	-
2011	RFC	1149	Indianapolis Power & Light Co.	U.S.	396,762	396,762	-	-	162,841	162,841	-	-	233,921	233,921	-	-
2011	RFC	1553	Integrus Energy Services (MECS-CONS)	U.S.	12,619	12,619	-	-	5,179	5,179	-	-	7,440	7,440	-	-
2011	RFC	1554	Integrus Energy Services (MECS-DET)	U.S.	9,510	9,510	-	-	3,903	3,903	-	-	5,607	5,607	-	-
2011	RFC	1614	Just Energy (MECS-DET)	U.S.	528	528	-	-	217	217	-	-	312	312	-	-
2011	RFC	1154	Michigan Public Power Agency	U.S.	32,035	32,035	-	-	13,148	13,148	-	-	18,887	18,887	-	-
2011	RFC	1155	Michigan South Central Power Agency	U.S.	14,971	14,971	-	-	6,145	6,145	-	-	8,827	8,827	-	-
2011	RFC	1158	MidAmerican Energy Company Retail	U.S.	2,484	2,484	-	-	1,019	1,019	-	-	1,464	1,464	-	-
2011	RFC	1163	Northern Indiana Public Service Co.	U.S.	464,342	464,342	-	-	190,577	190,577	-	-	273,765	273,765	-	-

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total ERO Assessments (NERC, RE & WIRAB Costs)				Total NERC Assessments				Total Regional Entity Assessments (Including WIRAB Assessments)			
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total
2011	RFC	1164	Ontonagon County Rural Electrification Assoc.	U.S.	765	765	-	-	314	314	-	-	451	451	-	-
2011	RFC	1265	PJM Interconnection, LLC	U.S.	18,432,718	18,432,718	-	-	7,565,244	7,565,244	-	-	10,867,474	10,867,474	-	-
2011	RFC	1172	Sempra Energy Solutions (MECS-CONS)	U.S.	29,943	29,943	-	-	12,289	12,289	-	-	17,654	17,654	-	-
2011	RFC	1171	Sempra Energy Solutions (MECS-DET)	U.S.	26,408	26,408	-	-	10,838	10,838	-	-	15,569	15,569	-	-
2011	RFC	1176	Direct Energy (fka:Strategic Energy,LLC) (MECS-CON)	U.S.	237	237	-	-	97	97	-	-	140	140	-	-
2011	RFC	1174	Direct Energy (fka:Strategic Energy,LLC) (MECS-DET)	U.S.	9,298	9,298	-	-	3,816	3,816	-	-	5,482	5,482	-	-
2011	RFC	1581	Spartan Renewable Energy	U.S.	1,656	1,656	-	-	680	680	-	-	977	977	-	-
2011	RFC	1180	Thumb Electric Cooperative	U.S.	4,472	4,472	-	-	1,835	1,835	-	-	2,636	2,636	-	-
2011	RFC	1627	US Department of Energy	U.S.	6,661	6,661	-	-	2,734	2,734	-	-	3,927	3,927	-	-
2011	RFC	1181	Vectren Energy Delivery of IN	U.S.	155,265	155,265	-	-	63,725	63,725	-	-	91,541	91,541	-	-
2011	RFC	1183	Village of Sebawaing	U.S.	993	993	-	-	407	407	-	-	585	585	-	-
2011	RFC	1184	Wabash Valley Power Association Inc. (DUKE CIN)	U.S.	71,597	71,597	-	-	29,385	29,385	-	-	42,212	42,212	-	-
2011	RFC	1487	Wabash Valley Power Association Inc. (MECS CONS)	U.S.	3,941	3,941	-	-	1,617	1,617	-	-	2,323	2,323	-	-
2011	RFC	1488	Wabash Valley Power Association Inc.(NIPSCO)	U.S.	43,304	43,304	-	-	17,773	17,773	-	-	25,531	25,531	-	-
2011	RFC	1185	Wisconsin Electric Power Co.	U.S.	765,927	765,927	-	-	314,355	314,355	-	-	451,572	451,572	-	-
2011	RFC	1189	Wolverine Power Marketing Cooperative	U.S.	27,575	27,575	-	-	11,317	11,317	-	-	16,258	16,258	-	-
2011	RFC	1191	Wolverine Power Supply Cooperative	U.S.	65,915	65,915	-	-	27,053	27,053	-	-	38,862	38,862	-	-
2011	RFC	1190	Wolverine Power Marketing Cooperative	U.S.	3,381	3,381	-	-	1,388	1,388	-	-	1,993	1,993	-	-
TOTAL RELIABILITYFIRST					24,027,209	24,027,209	-	-	9,861,361	9,861,361	-	-	14,165,848	14,165,848	-	-
2011	SERC	1267	Alabama Municipal Electric Authority	U.S.	86,135	86,135	-	-	38,617	38,617	-	-	47,518	47,518	-	-
2011	SERC	1268	Alabama Power Company	U.S.	1,460,325	1,460,325	-	-	654,711	654,711	-	-	805,614	805,614	-	-
2011	SERC	1269	Ameren - Illinois	U.S.	1,037,560	1,037,560	-	-	465,172	465,172	-	-	572,388	572,388	-	-
2011	SERC	1271	Ameren - Missouri	U.S.	1,017,204	1,017,204	-	-	456,046	456,046	-	-	561,158	561,158	-	-
2011	SERC	1272	APGI - Yadkin Division	U.S.	569	569	-	-	255	255	-	-	314	314	-	-
2011	SERC	1273	Associated Electric Cooperative Inc.	U.S.	471,170	471,170	-	-	211,241	211,241	-	-	259,929	259,929	-	-
2011	SERC	1582	Beauregard Electric Cooperative, Inc.	U.S.	26,404	26,404	-	-	11,838	11,838	-	-	14,566	14,566	-	-
2011	SERC	1462	Benton Utility District	U.S.	6,995	6,995	-	-	3,136	3,136	-	-	3,859	3,859	-	-
2011	SERC	1274	Big Rivers Electric Corporation	U.S.	257,139	257,139	-	-	115,284	115,284	-	-	141,855	141,855	-	-
2011	SERC	1275	Black Warrior EMC	U.S.	10,643	10,643	-	-	4,772	4,772	-	-	5,871	5,871	-	-
2011	SERC	1276	Blue Ridge EMC	U.S.	33,479	33,479	-	-	15,010	15,010	-	-	18,469	18,469	-	-
2011	SERC	1628	Brazos Electric Power Cooperative, Inc.	U.S.	10,244	10,244	-	-	4,593	4,593	-	-	5,651	5,651	-	-
2011	SERC	1463	Canton, MS	U.S.	3,119	3,119	-	-	1,398	1,398	-	-	1,720	1,720	-	-
2011	SERC	1277	Central Electric Power Cooperative Inc.	U.S.	384,968	384,968	-	-	172,594	172,594	-	-	212,374	212,374	-	-
2011	SERC	1278	City of Blountstown FL	U.S.	979	979	-	-	439	439	-	-	540	540	-	-
2011	SERC	1279	City of Camden SC	U.S.	4,927	4,927	-	-	2,209	2,209	-	-	2,718	2,718	-	-
2011	SERC	1280	City of Collins MS	U.S.	1,146	1,146	-	-	514	514	-	-	632	632	-	-
2011	SERC	1281	City of Columbia MO	U.S.	28,519	28,519	-	-	12,786	12,786	-	-	15,733	15,733	-	-
2011	SERC	1282	City of Conway AR (Conway Corporation)	U.S.	25,336	25,336	-	-	11,359	11,359	-	-	13,977	13,977	-	-
2011	SERC	1284	City of Evergreen AL	U.S.	1,483	1,483	-	-	665	665	-	-	818	818	-	-
2011	SERC	1285	City of Hampton GA	U.S.	644	644	-	-	289	289	-	-	355	355	-	-
2011	SERC	1286	City of Hartford AL	U.S.	824	824	-	-	369	369	-	-	455	455	-	-
2011	SERC	1287	City of Henderson (KY) Municipal Power & Light	U.S.	14,969	14,969	-	-	6,711	6,711	-	-	8,258	8,258	-	-
2011	SERC	1288	City of North Little Rock AR (DENL)	U.S.	23,796	23,796	-	-	10,669	10,669	-	-	13,128	13,128	-	-
2011	SERC	1289	City of Orangeburg SC Department of Public Utilities	U.S.	18,201	18,201	-	-	8,160	8,160	-	-	10,041	10,041	-	-
2011	SERC	1290	City of Robertsdale AL	U.S.	2,111	2,111	-	-	946	946	-	-	1,164	1,164	-	-
2011	SERC	1291	City of Ruston LA (DERS)	U.S.	6,997	6,997	-	-	3,137	3,137	-	-	3,860	3,860	-	-
2011	SERC	1292	City of Seneca SC	U.S.	3,923	3,923	-	-	1,759	1,759	-	-	2,164	2,164	-	-
2011	SERC	1115	City of Springfield (CWLP)	U.S.	45,035	45,035	-	-	20,190	20,190	-	-	24,844	24,844	-	-
2011	SERC	1465	City of Thayer, MO	U.S.	488	488	-	-	219	219	-	-	269	269	-	-
2011	SERC	1293	City of Troy AL	U.S.	10,074	10,074	-	-	4,517	4,517	-	-	5,557	5,557	-	-
2011	SERC	1294	City of West Memphis AR (West Memphis Utilities)	U.S.	9,476	9,476	-	-	4,248	4,248	-	-	5,228	5,228	-	-
2011	SERC	1583	Claiborne Electric Cooperative, Inc.	U.S.	16,349	16,349	-	-	7,330	7,330	-	-	9,019	9,019	-	-
2011	SERC	1584	Concordia Electric Cooperative, Inc.	U.S.	6,341	6,341	-	-	2,843	2,843	-	-	3,498	3,498	-	-
2011	SERC	1283	Dalton Utilities	U.S.	36,547	36,547	-	-	16,385	16,385	-	-	20,162	20,162	-	-
2011	SERC	1585	Dixie Electric Membership Corporation	U.S.	56,098	56,098	-	-	25,151	25,151	-	-	30,948	30,948	-	-
2011	SERC	1295	Dominion Virginia Power	U.S.	2,021,608	2,021,608	-	-	906,353	906,353	-	-	1,115,255	1,115,255	-	-
2011	SERC	1296	Duke Energy Carolinas, LLC	U.S.	2,002,972	2,002,972	-	-	897,998	897,998	-	-	1,104,975	1,104,975	-	-
2011	SERC	1466	Durant, MS	U.S.	675	675	-	-	303	303	-	-	372	372	-	-
2011	SERC	1478	E.ON U.S. Services Inc.	U.S.	835,268	835,268	-	-	374,478	374,478	-	-	460,790	460,790	-	-
2011	SERC	1297	East Kentucky Power Cooperative	U.S.	300,528	300,528	-	-	134,737	134,737	-	-	165,792	165,792	-	-

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					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total
2011	SERC	1298	East Mississippi Electric Power Association	U.S.	11,438	11,438	-	-	5,128	5,128	-	-	6,310	6,310	-	-
2011	SERC	1629	East Texas Electric Cooperative Inc	U.S.	50,469	50,469	-	-	22,627	22,627	-	-	27,842	27,842	-	-
2011	SERC	1299	Electric Energy Inc.	U.S.	31,918	31,918	-	-	14,310	14,310	-	-	17,608	17,608	-	-
2011	SERC	1300	EnergyUnited EMC	U.S.	60,792	60,792	-	-	27,255	27,255	-	-	33,537	33,537	-	-
2011	SERC	1301	Entergy	U.S.	2,833,821	2,833,821	-	-	1,270,494	1,270,494	-	-	1,563,327	1,563,327	-	-
2011	SERC	1302	Fayetteville (NC) Public Works Commission	U.S.	53,864	53,864	-	-	24,149	24,149	-	-	29,715	29,715	-	-
2011	SERC	1303	Florida Public Utilities (FL Panhandle Load)	U.S.	8,260	8,260	-	-	3,703	3,703	-	-	4,556	4,556	-	-
2011	SERC	1304	French Broad EMC	U.S.	13,388	13,388	-	-	6,002	6,002	-	-	7,386	7,386	-	-
2011	SERC	1305	Georgia Power Company	U.S.	2,199,771	2,199,771	-	-	986,229	986,229	-	-	1,213,542	1,213,542	-	-
2011	SERC	1306	Georgia System Optns Corporation	U.S.	940,788	940,788	-	-	421,786	421,786	-	-	519,002	519,002	-	-
2011	SERC	1479	Greenwood (MS) Utilities Commission	U.S.	6,825	6,825	-	-	3,060	3,060	-	-	3,765	3,765	-	-
2011	SERC	1307	Greenwood (SC) Commissioners of Public Works	U.S.	6,396	6,396	-	-	2,867	2,867	-	-	3,528	3,528	-	-
2011	SERC	1308	Gulf Power Company	U.S.	294,488	294,488	-	-	132,028	132,028	-	-	162,459	162,459	-	-
2011	SERC	1586	Haywood EMC	U.S.	7,252	7,252	-	-	3,251	3,251	-	-	4,001	4,001	-	-
2011	SERC	1309	Illinois Municipal Electric Agency	U.S.	46,600	46,600	-	-	20,892	20,892	-	-	25,708	25,708	-	-
2011	SERC	1480	Itta Bena, MS	U.S.	396	396	-	-	177	177	-	-	218	218	-	-
2011	SERC	1587	Jefferson Davis Electric Cooperative, Inc.	U.S.	6,647	6,647	-	-	2,980	2,980	-	-	3,667	3,667	-	-
2011	SERC	1617	Kentucky Municipal Power	U.S.	17,779	17,779	-	-	7,971	7,971	-	-	9,808	9,808	-	-
2011	SERC	1481	Kosciusko, MS	U.S.	1,852	1,852	-	-	830	830	-	-	1,021	1,021	-	-
2011	SERC	1482	Leland, MS	U.S.	828	828	-	-	371	371	-	-	457	457	-	-
2011	SERC	1313	McCormick Commission of Public Works	U.S.	425	425	-	-	191	191	-	-	234	234	-	-
2011	SERC	1314	Mississippi Power Company	U.S.	258,726	258,726	-	-	115,995	115,995	-	-	142,731	142,731	-	-
2011	SERC	1630	Mt. Carmel Public Utility	U.S.	2,659	2,659	-	-	1,192	1,192	-	-	1,467	1,467	-	-
2011	SERC	1315	Municipal Electric Authority of Georgia	U.S.	265,393	265,393	-	-	118,984	118,984	-	-	146,409	146,409	-	-
2011	SERC	1316	N.C. Electric Membership Corp.	U.S.	298,315	298,315	-	-	133,744	133,744	-	-	164,571	164,571	-	-
2011	SERC	1317	North Carolina Eastern Municipal Power Agency	U.S.	183,478	183,478	-	-	82,259	82,259	-	-	101,219	101,219	-	-
2011	SERC	1318	North Carolina Municipal Power Agency #1	U.S.	114,990	114,990	-	-	51,554	51,554	-	-	63,436	63,436	-	-
2011	SERC	1588	Northeast Louisiana Power Cooperative, Inc.	U.S.	7,220	7,220	-	-	3,237	3,237	-	-	3,983	3,983	-	-
2011	SERC	1574	Northern Virginia Electric Cooperative	U.S.	90,499	90,499	-	-	40,574	40,574	-	-	49,925	49,925	-	-
2011	SERC	1319	Old Dominion Electric Cooperative	U.S.	142,642	142,642	-	-	63,951	63,951	-	-	78,691	78,691	-	-
2011	SERC	1618	Osceola (Arkansas) Municipal Light and Power	U.S.	4,382	4,382	-	-	1,965	1,965	-	-	2,417	2,417	-	-
2011	SERC	1320	Owensboro (KY) Municipal Utilities	U.S.	21,826	21,826	-	-	9,785	9,785	-	-	12,041	12,041	-	-
2011	SERC	1322	Piedmont EMC in Duke and Progress Areas	U.S.	12,232	12,232	-	-	5,484	5,484	-	-	6,748	6,748	-	-
2011	SERC	1323	Piedmont Municipal Power Agency (PMPA)	U.S.	56,670	56,670	-	-	25,407	25,407	-	-	31,263	31,263	-	-
2011	SERC	1589	Pointe Coupee Electric Memb. Corp.	U.S.	6,381	6,381	-	-	2,861	2,861	-	-	3,520	3,520	-	-
2011	SERC	1266	PowerSouth Energy	U.S.	205,387	205,387	-	-	92,082	92,082	-	-	113,305	113,305	-	-
2011	SERC	1330	Prairie Power, Inc.	U.S.	37,316	37,316	-	-	16,730	16,730	-	-	20,586	20,586	-	-
2011	SERC	1324	Progress Energy Carolinas	U.S.	1,111,269	1,111,269	-	-	498,218	498,218	-	-	613,051	613,051	-	-
2011	SERC	1325	Rutherford EMC	U.S.	31,235	31,235	-	-	14,004	14,004	-	-	17,232	17,232	-	-
2011	SERC	1631	Sam Rayburn G&T Electric Cooperative Inc.	U.S.	45,354	45,354	-	-	20,334	20,334	-	-	25,020	25,020	-	-
2011	SERC	1326	South Carolina Electric & Gas Company	U.S.	559,814	559,814	-	-	250,983	250,983	-	-	308,831	308,831	-	-
2011	SERC	1327	South Carolina Public Service Authority	U.S.	272,069	272,069	-	-	121,977	121,977	-	-	150,091	150,091	-	-
2011	SERC	1590	South Louisiana Electric Cooperative Association	U.S.	15,638	15,638	-	-	7,011	7,011	-	-	8,627	8,627	-	-
2011	SERC	1328	South Mississippi Electric Power Association	U.S.	248,646	248,646	-	-	111,476	111,476	-	-	137,170	137,170	-	-
2011	SERC	1329	Southern Illinois Power Cooperative	U.S.	35,329	35,329	-	-	15,839	15,839	-	-	19,490	19,490	-	-
2011	SERC	1591	Southwest Louisiana Electric Membership Corporati	U.S.	62,563	62,563	-	-	28,049	28,049	-	-	34,514	34,514	-	-
2011	SERC	1619	Southwestern Electric Cooperative, Inc.	U.S.	11,117	11,117	-	-	4,984	4,984	-	-	6,133	6,133	-	-
2011	SERC	1331	Tennessee Valley Authority	U.S.	4,049,514	4,049,514	-	-	1,815,529	1,815,529	-	-	2,233,985	2,233,985	-	-
2011	SERC	1632	Tex-La Electric Cooperative of Texas, Inc	U.S.	5,114	5,114	-	-	2,293	2,293	-	-	2,821	2,821	-	-
2011	SERC	1332	Tombigbee Electric Cooperative Inc.	U.S.	3,634	3,634	-	-	1,629	1,629	-	-	2,005	2,005	-	-
2011	SERC	1592	Town of Black Creek, N.C.	U.S.	306	306	-	-	137	137	-	-	169	169	-	-
2011	SERC	1593	Town of Lucama, N.C.	U.S.	505	505	-	-	226	226	-	-	279	279	-	-
2011	SERC	1594	Town of Sharpsburg, N.C.	U.S.	491	491	-	-	220	220	-	-	271	271	-	-
2011	SERC	1595	Town of Stantonburg, N.C.	U.S.	552	552	-	-	248	248	-	-	305	305	-	-
2011	SERC	1333	Town of Waynesville NC	U.S.	2,191	2,191	-	-	982	982	-	-	1,208	1,208	-	-
2011	SERC	1334	Town of Winnsboro SC	U.S.	1,315	1,315	-	-	589	589	-	-	725	725	-	-
2011	SERC	1335	Town of Winterville NC	U.S.	1,281	1,281	-	-	574	574	-	-	706	706	-	-
2011	SERC	1597	Washington-St.Tammany Electric Cooperative, Inc.	U.S.	27,918	27,918	-	-	12,517	12,517	-	-	15,401	15,401	-	-
TOTAL SERC					25,069,232	25,069,232	-	-	11,239,354	11,239,354	-	-	13,829,878	13,829,878	-	-

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total ERO Assessments (NERC, RE & WIRAB Costs)				Total NERC Assessments				Total Regional Entity Assessments (Including WIRAB Assessments)			
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total
2011	SPP	1246	American Electric Power	U.S.	1,901,534	1,901,534	-	-	416,469	416,469	-	-	1,485,064	1,485,064	-	-
2011	SPP	1435	Arkansas Electric Cooperative Corporation (AEP)	U.S.	238,319	238,319	-	-	52,196	52,196	-	-	186,123	186,123	-	-
2011	SPP	1247	Board of Public Utilities (Kansas City KS)	U.S.	124,082	124,082	-	-	27,176	27,176	-	-	96,906	96,906	-	-
2011	SPP	1620	Board of Public Utilities, City of McPherson, Kansas	U.S.	46,194	46,194	-	-	10,117	10,117	-	-	36,077	36,077	-	-
2011	SPP		Carthage City Water & Light	U.S.	14,392	14,392	-	-	3,152	3,152	-	-	11,240	11,240	-	-
2011	SPP	1469	Central Valley Electric Cooperative	U.S.	38,977	38,977	-	-	8,537	8,537	-	-	30,440	30,440	-	-
2011	SPP	1556	City of Bentonville	U.S.	31,728	31,728	-	-	6,949	6,949	-	-	24,779	24,779	-	-
2011	SPP	1557	City of Clarksdale, Mississippi	U.S.	8,743	8,743	-	-	1,915	1,915	-	-	6,828	6,828	-	-
2011	SPP	1633	City of Lindsborg	U.S.	1,584	1,584	-	-	347	347	-	-	1,237	1,237	-	-
2011	SPP	1558	Hope Water & Light (HWL)	U.S.	14,983	14,983	-	-	3,282	3,282	-	-	11,701	11,701	-	-
2011	SPP	1559	City of Minden	U.S.	8,875	8,875	-	-	1,944	1,944	-	-	6,931	6,931	-	-
2011	SPP	1634	City of Mulvane	U.S.	2,283	2,283	-	-	500	500	-	-	1,783	1,783	-	-
2011	SPP	1635	The City of Osage City	U.S.	1,806	1,806	-	-	396	396	-	-	1,411	1,411	-	-
2011	SPP	1636	City of Prescott	U.S.	4,498	4,498	-	-	985	985	-	-	3,513	3,513	-	-
2011	SPP	1248	Independence Power & Light (Independence, MO)	U.S.	56,677	56,677	-	-	12,413	12,413	-	-	44,264	44,264	-	-
2011	SPP	1436	City Utilities of Springfield, MO	U.S.	163,892	163,892	-	-	35,895	35,895	-	-	127,996	127,996	-	-
2011	SPP	1249	Cleco Power LLC	U.S.	598,191	598,191	-	-	131,014	131,014	-	-	467,177	467,177	-	-
2011	SPP	1437	East Texas Electric Coop, Inc.	U.S.	22,627	22,627	-	-	4,956	4,956	-	-	17,671	17,671	-	-
2011	SPP	1250	The Empire District Electric Company	U.S.	272,819	272,819	-	-	59,752	59,752	-	-	213,067	213,067	-	-
2011	SPP	1470	Farmers' Electric Coop	U.S.	23,936	23,936	-	-	5,242	5,242	-	-	18,693	18,693	-	-
2011	SPP	1438	Golden Spread Electric Coop	U.S.	291,462	291,462	-	-	63,835	63,835	-	-	227,627	227,627	-	-
2011	SPP	1251	Grand River Dam Authority	U.S.	241,338	241,338	-	-	52,857	52,857	-	-	188,481	188,481	-	-
2011	SPP		Jonesboro City Water & Light	U.S.	67,956	67,956	-	-	14,884	14,884	-	-	53,073	53,073	-	-
2011	SPP	1252	Kansas City Power & Light (KCPL)	U.S.	812,880	812,880	-	-	178,035	178,035	-	-	634,845	634,845	-	-
2011	SPP	1439	Kansas Electric Power Coop., Inc	U.S.	111,108	111,108	-	-	24,335	24,335	-	-	86,773	86,773	-	-
2011	SPP	1440	Kansas Municipal Energy Agency (KCPL)	U.S.	40,125	40,125	-	-	8,788	8,788	-	-	31,337	31,337	-	-
2011	SPP	1637	Kansas Power Pool	U.S.	71,603	71,603	-	-	15,682	15,682	-	-	55,921	55,921	-	-
2011	SPP	1560	Kaw Valley Electric Cooperative, Inc.	U.S.	8,475	8,475	-	-	1,856	1,856	-	-	6,619	6,619	-	-
2011	SPP		Kennett Board of Public Works	U.S.	7,824	7,824	-	-	1,714	1,714	-	-	6,111	6,111	-	-
2011	SPP	1598	KCP&L GMOC (Greater Missouri Operations Compa	U.S.	447,052	447,052	-	-	97,912	97,912	-	-	349,140	349,140	-	-
2011	SPP	1471	Lafayette Utilities System	U.S.	108,920	108,920	-	-	23,855	23,855	-	-	85,064	85,064	-	-
2011	SPP	1472	Lea County Electric Coop	U.S.	65,832	65,832	-	-	14,418	14,418	-	-	51,413	51,413	-	-
2011	SPP	1253	Louisiana Energy & Power Authority (LEPA)	U.S.	50,084	50,084	-	-	10,969	10,969	-	-	39,115	39,115	-	-
2011	SPP		Malden Board of Public Works	U.S.	2,646	2,646	-	-	580	580	-	-	2,066	2,066	-	-
2011	SPP	1441	Midwest Energy Inc.	U.S.	91,133	91,133	-	-	19,960	19,960	-	-	71,173	71,173	-	-
2011	SPP	1443	Missouri Joint Municipal Electric Utility Commissior	U.S.	131,090	131,090	-	-	28,711	28,711	-	-	102,379	102,379	-	-
2011	SPP	1638	Nemaha Marshall Electric Cooperative (NMEC)	U.S.	3,071	3,071	-	-	673	673	-	-	2,399	2,399	-	-
2011	SPP	1442	Northeast Texas Electric Cooperative, Inc.	U.S.	170,591	170,591	-	-	37,363	37,363	-	-	133,229	133,229	-	-
2011	SPP	1255	Oklahoma Gas and Electric Co.	U.S.	1,468,243	1,468,243	-	-	321,571	321,571	-	-	1,146,672	1,146,672	-	-
2011	SPP	1444	Oklahoma Municipal Power Auth	U.S.	149,745	149,745	-	-	32,797	32,797	-	-	116,948	116,948	-	-
2011	SPP	1639	OzMo Ozark Missouri, West Plains MO	U.S.	10,474	10,474	-	-	2,294	2,294	-	-	8,180	8,180	-	-
2011	SPP		Paragould Light, Water & Cable	U.S.	30,189	30,189	-	-	6,612	6,612	-	-	23,577	23,577	-	-
2011	SPP		Piggott Municipal Light, Water & Sewer	U.S.	2,235	2,235	-	-	489	489	-	-	1,745	1,745	-	-
2011	SPP		Poplar Bluff Municipal Utilities	U.S.	19,681	19,681	-	-	4,310	4,310	-	-	15,370	15,370	-	-
2011	SPP	1561	Public Service Commission of Yazoo City of Mississi	U.S.	6,418	6,418	-	-	1,406	1,406	-	-	5,012	5,012	-	-
2011	SPP	1473	Roosevelt County Electric Coop	U.S.	11,668	11,668	-	-	2,556	2,556	-	-	9,113	9,113	-	-
2011	SPP	1468	Sharyland Utilities, LP	U.S.	54,792	54,792	-	-	12,000	12,000	-	-	42,792	42,792	-	-
2011	SPP		Sikeston Board of Municipal Utilities	U.S.	18,593	18,593	-	-	4,072	4,072	-	-	14,521	14,521	-	-
2011	SPP	1258	Southwestern Power Administration (SPA)	U.S.	12,769	12,769	-	-	2,797	2,797	-	-	9,973	9,973	-	-
2011	SPP	1257	Southwestern Public Service Co. (SPS-XCEL)	U.S.	849,914	849,914	-	-	186,146	186,146	-	-	663,768	663,768	-	-
2011	SPP	1256	Sunflower Electric Power Cooperative	U.S.	291,303	291,303	-	-	63,800	63,800	-	-	227,502	227,502	-	-
2011	SPP	1445	Tex - La Electric Cooperative of Texas	U.S.	26,797	26,797	-	-	5,869	5,869	-	-	20,928	20,928	-	-
2011	SPP	1475	Tri County Electric Coop	U.S.	21,175	21,175	-	-	4,638	4,638	-	-	16,537	16,537	-	-
2011	SPP	1260	Westar Energy, Inc.	U.S.	1,102,356	1,102,356	-	-	241,435	241,435	-	-	860,921	860,921	-	-
2011	SPP	1259	Western Farmers Electric Cooperative	U.S.	397,005	397,005	-	-	86,951	86,951	-	-	310,054	310,054	-	-
2011	SPP	1501	West Texas Municipal Power Agency	U.S.	149,523	149,523	-	-	32,748	32,748	-	-	116,775	116,775	-	-
			TOTAL SPP		10,922,211	10,922,211	-	-	2,392,157	2,392,157	-	-	8,530,054	8,530,054	-	-
2011	TRE	1019	ERCOT	U.S.	11,724,917	11,724,917	-	-	3,572,397	3,572,397	-	-	8,152,520	8,152,520	-	-
					11,724,917	11,724,917	-	-	3,572,397	3,572,397	-	-	8,152,520	8,152,520	-	-

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total ERO Assessments (NERC, RE & WIRAB Costs)				Total NERC Assessments				Total Regional Entity Assessments (Including WIRAB Assessments)			
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total
2011	WECC		Alberta Electric System Operator	Canada	2,704,750	-	2,704,750	-	466,437	-	466,437	-	2,238,313	-	2,238,313	-
2011	WECC		British Columbia Hydro & Power Authority	Canada	3,889,239	-	3,889,239	-	683,972	-	683,972	-	3,205,267	-	3,205,267	-
2011	WECC		Comision Federal de Electricidad	Mexico	708,998	-	-	708,998	124,686	-	-	124,686	584,312	-	-	584,312
2011	WECC		Aha Macav Power Service	U.S.	1,551	1,551	-	-	278	278	-	-	1,273	1,273	-	-
2011	WECC		Ajo Improvement District	U.S.	836	836	-	-	150	150	-	-	686	686	-	-
2011	WECC		Ak-Chin	U.S.	2,000	2,000	-	-	358	358	-	-	1,642	1,642	-	-
2011	WECC		Alcoa Inc	U.S.	190,816	190,816	-	-	34,200	34,200	-	-	156,616	156,616	-	-
2011	WECC		Arizona Public Service Company	U.S.	1,819,240	1,819,240	-	-	326,058	326,058	-	-	1,493,182	1,493,182	-	-
2011	WECC		Arkansas River Power Authority (ARPA)	U.S.	18,071	18,071	-	-	3,239	3,239	-	-	14,832	14,832	-	-
2011	WECC		Avista Corporation	U.S.	557,779	557,779	-	-	99,970	99,970	-	-	457,810	457,810	-	-
2011	WECC		Avista Corporation	U.S.	10,606	10,606	-	-	1,901	1,901	-	-	8,705	8,705	-	-
2011	WECC		Barrick Goldstrike Mines Inc.	U.S.	70,113	70,113	-	-	12,566	12,566	-	-	57,547	57,547	-	-
2011	WECC		Basin Electric Power Cooperative	U.S.	198,707	198,707	-	-	35,614	35,614	-	-	163,093	163,093	-	-
2011	WECC		Basin Electric Power Cooperative	U.S.	3,348	3,348	-	-	600	600	-	-	2,748	2,748	-	-
2011	WECC		Benton REA	U.S.	32,311	32,311	-	-	5,791	5,791	-	-	26,520	26,520	-	-
2011	WECC		Big Bend Electric Cooperative, Inc.	U.S.	7,987	7,987	-	-	1,431	1,431	-	-	6,555	6,555	-	-
2011	WECC		Big Bend Electric Cooperative, Inc.	U.S.	20,378	20,378	-	-	3,652	3,652	-	-	16,726	16,726	-	-
2011	WECC		Big Bend Electric Cooperative, Inc.	U.S.	2,220	2,220	-	-	398	398	-	-	1,822	1,822	-	-
2011	WECC		Blachly-Lane Electric Cooperative	U.S.	9,538	9,538	-	-	1,710	1,710	-	-	7,829	7,829	-	-
2011	WECC		Black Hills Power	U.S.	112,102	112,102	-	-	20,092	20,092	-	-	92,010	92,010	-	-
2011	WECC		Black Hills Power/Cheyenne Light Fuel & Power	U.S.	213,646	213,646	-	-	38,291	38,291	-	-	175,355	175,355	-	-
2011	WECC		Bonneville Power Administration	U.S.	270,269	270,269	-	-	48,440	48,440	-	-	221,829	221,829	-	-
2011	WECC		Bonneville Power Administration	U.S.	99,450	99,450	-	-	17,824	17,824	-	-	81,625	81,625	-	-
2011	WECC		Bonneville Power Administration	U.S.	45,608	45,608	-	-	8,174	8,174	-	-	37,434	37,434	-	-
2011	WECC		Bonneville Power Administration	U.S.	375	375	-	-	67	67	-	-	308	308	-	-
2011	WECC		Bonneville Power Administration	U.S.	998	998	-	-	179	179	-	-	819	819	-	-
2011	WECC		BPA - USBR Load	U.S.	7,942	7,942	-	-	1,423	1,423	-	-	6,518	6,518	-	-
2011	WECC		Bureau of Reclamation (Desalter) - c/o DSW EMMO	U.S.	82	82	-	-	15	15	-	-	67	67	-	-
2011	WECC		Bureau of Reclamation (Wellfield) - c/o DSW EMMO	U.S.	306	306	-	-	55	55	-	-	251	251	-	-
2011	WECC		California Independent System Operator	U.S.	13,658,555	13,658,555	-	-	2,447,993	2,447,993	-	-	11,210,561	11,210,561	-	-
2011	WECC		Canby Public Utility Board	U.S.	10,615	10,615	-	-	1,903	1,903	-	-	8,713	8,713	-	-
2011	WECC		Central Arizona Water Conservation District	U.S.	109,732	109,732	-	-	19,667	19,667	-	-	90,065	90,065	-	-
2011	WECC		Central Arizona Water Conservation District	U.S.	86,734	86,734	-	-	15,545	15,545	-	-	71,189	71,189	-	-
2011	WECC		Central Electric Cooperative	U.S.	30,769	30,769	-	-	5,515	5,515	-	-	25,255	25,255	-	-
2011	WECC		Central Lincoln PUD	U.S.	80,687	80,687	-	-	14,461	14,461	-	-	66,226	66,226	-	-
2011	WECC		Central Montana Electric Power Cooperative	U.S.	1,826	1,826	-	-	327	327	-	-	1,499	1,499	-	-
2011	WECC		Central Montana Electric Power Cooperative	U.S.	5,439	5,439	-	-	975	975	-	-	4,465	4,465	-	-
2011	WECC		City of Aztec Electric Dept	U.S.	2,064	2,064	-	-	370	370	-	-	1,694	1,694	-	-
2011	WECC		City of Bandon	U.S.	4,011	4,011	-	-	719	719	-	-	3,292	3,292	-	-
2011	WECC		City of Blaine	U.S.	4,731	4,731	-	-	848	848	-	-	3,883	3,883	-	-
2011	WECC		City of Bonners Ferry	U.S.	4,027	4,027	-	-	722	722	-	-	3,305	3,305	-	-
2011	WECC		City of Boulder City	U.S.	9,671	9,671	-	-	1,733	1,733	-	-	7,938	7,938	-	-
2011	WECC		City of Cascade Locks	U.S.	1,183	1,183	-	-	212	212	-	-	971	971	-	-
2011	WECC		City of Centralia	U.S.	16,532	16,532	-	-	2,963	2,963	-	-	13,569	13,569	-	-
2011	WECC		City of Cheney	U.S.	8,561	8,561	-	-	1,534	1,534	-	-	7,026	7,026	-	-
2011	WECC		City of Chewelah	U.S.	1,458	1,458	-	-	261	261	-	-	1,197	1,197	-	-
2011	WECC		City of Drain	U.S.	1,004	1,004	-	-	180	180	-	-	824	824	-	-
2011	WECC		City of Ellensburg	U.S.	12,242	12,242	-	-	2,194	2,194	-	-	10,048	10,048	-	-
2011	WECC		City of Fallon	U.S.	6,924	6,924	-	-	1,241	1,241	-	-	5,683	5,683	-	-
2011	WECC		City of Forest Grove	U.S.	14,560	14,560	-	-	2,610	2,610	-	-	11,950	11,950	-	-
2011	WECC		City of Gallup	U.S.	13,097	13,097	-	-	2,347	2,347	-	-	10,750	10,750	-	-
2011	WECC		City of Henderson	U.S.	845	845	-	-	152	152	-	-	694	694	-	-
2011	WECC		City of Hermiston, DBA Hermiston Energy Services	U.S.	6,508	6,508	-	-	1,166	1,166	-	-	5,341	5,341	-	-
2011	WECC		City of Las Vegas	U.S.	2,726	2,726	-	-	489	489	-	-	2,237	2,237	-	-
2011	WECC		City of McCleary	U.S.	1,786	1,786	-	-	320	320	-	-	1,466	1,466	-	-
2011	WECC		City of McMinville	U.S.	44,291	44,291	-	-	7,938	7,938	-	-	36,353	36,353	-	-
2011	WECC		City of Mesa	U.S.	15,338	15,338	-	-	2,749	2,749	-	-	12,589	12,589	-	-
2011	WECC		City of Milton	U.S.	3,791	3,791	-	-	679	679	-	-	3,112	3,112	-	-
2011	WECC		City of Milton-Freewater	U.S.	6,553	6,553	-	-	1,174	1,174	-	-	5,378	5,378	-	-
2011	WECC		City of Monmouth	U.S.	4,356	4,356	-	-	781	781	-	-	3,575	3,575	-	-
2011	WECC		City of Needles	U.S.	1,890	1,890	-	-	339	339	-	-	1,551	1,551	-	-

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total ERO Assessments (NERC, RE & WIRAB Costs)				Total NERC Assessments				Total Regional Entity Assessments (Including WIRAB Assessments)			
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total
2011	WECC		City of Plummer	U.S.	2,099	2,099	-	-	376	376	-	-	1,723	1,723	-	-
2011	WECC		City of Port Angeles	U.S.	44,949	44,949	-	-	8,056	8,056	-	-	36,893	36,893	-	-
2011	WECC		City of Redding	U.S.	72,779	72,779	-	-	13,044	13,044	-	-	59,735	59,735	-	-
2011	WECC		City of Richland	U.S.	52,489	52,489	-	-	9,407	9,407	-	-	43,081	43,081	-	-
2011	WECC		City of Roseville	U.S.	47,490	47,490	-	-	8,511	8,511	-	-	38,978	38,978	-	-
2011	WECC		City of Shasta Lake	U.S.	10,968	10,968	-	-	1,966	1,966	-	-	9,002	9,002	-	-
2011	WECC		City of Sumas	U.S.	1,815	1,815	-	-	325	325	-	-	1,490	1,490	-	-
2011	WECC		City of Tacoma DBA Tacoma Power	U.S.	21	21	-	-	4	4	-	-	17	17	-	-
2011	WECC		City of Tacoma DBA Tacoma Power	U.S.	301,940	301,940	-	-	54,116	54,116	-	-	247,824	247,824	-	-
2011	WECC		City of Troy	U.S.	1,089	1,089	-	-	195	195	-	-	894	894	-	-
2011	WECC		City of Williams	U.S.	2,383	2,383	-	-	427	427	-	-	1,956	1,956	-	-
2011	WECC		Clark County Water Resources	U.S.	361	361	-	-	65	65	-	-	297	297	-	-
2011	WECC		Clark Public Utilities	U.S.	268,386	268,386	-	-	48,102	48,102	-	-	220,284	220,284	-	-
2011	WECC		Clatskanie PUD	U.S.	47,289	47,289	-	-	8,475	8,475	-	-	38,813	38,813	-	-
2011	WECC		Clearwater Cooperative, Inc	U.S.	9,883	9,883	-	-	1,771	1,771	-	-	8,112	8,112	-	-
2011	WECC		Clearwater Cooperative, Inc	U.S.	2,384	2,384	-	-	427	427	-	-	1,956	1,956	-	-
2011	WECC		Colorado River Agency-Bureau of Indian Affairs	U.S.	873	873	-	-	156	156	-	-	717	717	-	-
2011	WECC		Colorado River Commission of Nevada	U.S.	47,659	47,659	-	-	8,542	8,542	-	-	39,117	39,117	-	-
2011	WECC		Colorado Springs Utilities	U.S.	4,856	4,856	-	-	870	870	-	-	3,985	3,985	-	-
2011	WECC		Colorado Springs Utilities	U.S.	1,186	1,186	-	-	213	213	-	-	974	974	-	-
2011	WECC		Columbia Basin Electric Cooperative, Inc.	U.S.	6,345	6,345	-	-	1,137	1,137	-	-	5,208	5,208	-	-
2011	WECC		Columbia Falls Aluminum Company	U.S.	254	254	-	-	45	45	-	-	208	208	-	-
2011	WECC		Columbia Power Cooperative Association	U.S.	1,269	1,269	-	-	227	227	-	-	1,041	1,041	-	-
2011	WECC		Columbia River PUD	U.S.	10,131	10,131	-	-	1,816	1,816	-	-	8,316	8,316	-	-
2011	WECC		Columbia River PUD	U.S.	19,103	19,103	-	-	3,424	3,424	-	-	15,679	15,679	-	-
2011	WECC		Columbia Rural Electric Association (REA)	U.S.	18,235	18,235	-	-	3,268	3,268	-	-	14,966	14,966	-	-
2011	WECC		Consolidated Irrigation District No. 19	U.S.	334	334	-	-	60	60	-	-	275	275	-	-
2011	WECC		Constellation New Energy, Inc.	U.S.	4,357	4,357	-	-	781	781	-	-	3,576	3,576	-	-
2011	WECC		Consumers Power, Inc.	U.S.	25,307	25,307	-	-	4,536	4,536	-	-	20,771	20,771	-	-
2011	WECC		Coos-Curry Electric Cooperative, Inc	U.S.	21,311	21,311	-	-	3,819	3,819	-	-	17,491	17,491	-	-
2011	WECC		Deseret Generation & Transmission Cooperative	U.S.	272,657	272,657	-	-	48,868	48,868	-	-	223,790	223,790	-	-
2011	WECC		Deseret Generation & Transmission Cooperative	U.S.	5,176	5,176	-	-	928	928	-	-	4,248	4,248	-	-
2011	WECC		Douglas Electric Cooperative, Inc.	U.S.	5,726	5,726	-	-	1,026	1,026	-	-	4,700	4,700	-	-
2011	WECC		Douglas Palisades	U.S.	1,067	1,067	-	-	191	191	-	-	876	876	-	-
2011	WECC		El Paso Electric Company	U.S.	496,354	496,354	-	-	88,961	88,961	-	-	407,394	407,394	-	-
2011	WECC		Electrical District #2	U.S.	10,867	10,867	-	-	1,948	1,948	-	-	8,919	8,919	-	-
2011	WECC		Electrical District #2 - Coolidge Generating Station	U.S.	539	539	-	-	97	97	-	-	443	443	-	-
2011	WECC		Electrical Districts 1 & 3	U.S.	39,792	39,792	-	-	7,132	7,132	-	-	32,660	32,660	-	-
2011	WECC		Elmhurst Mutual Power & Light Company	U.S.	16,775	16,775	-	-	3,007	3,007	-	-	13,768	13,768	-	-
2011	WECC		Emerald PUD	U.S.	41,289	41,289	-	-	7,400	7,400	-	-	33,889	33,889	-	-
2011	WECC		Energy Northwest	U.S.	1,591	1,591	-	-	285	285	-	-	1,306	1,306	-	-
2011	WECC		Eugene Water & Electric Board	U.S.	148,421	148,421	-	-	26,601	26,601	-	-	121,820	121,820	-	-
2011	WECC		Farmington Electric Utility System	U.S.	62,087	62,087	-	-	11,128	11,128	-	-	50,959	50,959	-	-
2011	WECC		Flathead Electric Cooperative, Inc	U.S.	86,178	86,178	-	-	15,446	15,446	-	-	70,733	70,733	-	-
2011	WECC		Frederickson Power LP	U.S.	310	310	-	-	56	56	-	-	254	254	-	-
2011	WECC		Grand Valley Power	U.S.	13,568	13,568	-	-	2,432	2,432	-	-	11,136	11,136	-	-
2011	WECC		Harney Electric Cooperative, Inc.	U.S.	6,608	6,608	-	-	1,184	1,184	-	-	5,424	5,424	-	-
2011	WECC		Harney Electric Cooperative, Inc.	U.S.	3,976	3,976	-	-	713	713	-	-	3,264	3,264	-	-
2011	WECC		Hermiston Power LLC	U.S.	352	352	-	-	63	63	-	-	289	289	-	-
2011	WECC		Holy Cross Energy	U.S.	43,494	43,494	-	-	7,795	7,795	-	-	35,699	35,699	-	-
2011	WECC		Hood River Electric Cooperative	U.S.	2,469	2,469	-	-	443	443	-	-	2,027	2,027	-	-
2011	WECC		Idaho County Light and Power Cooperative Associat	U.S.	3,435	3,435	-	-	616	616	-	-	2,819	2,819	-	-
2011	WECC		Idaho Power Company	U.S.	891,274	891,274	-	-	159,741	159,741	-	-	731,533	731,533	-	-
2011	WECC		Imperial Irrigation District	U.S.	214,105	214,105	-	-	38,374	38,374	-	-	175,731	175,731	-	-
2011	WECC		Inland Power and Light Company	U.S.	27,795	27,795	-	-	4,982	4,982	-	-	22,814	22,814	-	-
2011	WECC		Inland Power and Light Company	U.S.	28,871	28,871	-	-	5,175	5,175	-	-	23,697	23,697	-	-
2011	WECC		Intermountain Rural Electric Association	U.S.	66,392	66,392	-	-	11,899	11,899	-	-	54,493	54,493	-	-
2011	WECC		Kaiser Aluminum Fabricated Products LLC	U.S.	18,675	18,675	-	-	3,347	3,347	-	-	15,328	15,328	-	-
2011	WECC		Kootenai Electric Cooperative, Inc.	U.S.	28,188	28,188	-	-	5,052	5,052	-	-	23,136	23,136	-	-
2011	WECC		Lakeview Light & Power	U.S.	16,764	16,764	-	-	3,005	3,005	-	-	13,760	13,760	-	-
2011	WECC		Lane Electric Cooperative, Inc.	U.S.	13,641	13,641	-	-	2,445	2,445	-	-	11,196	11,196	-	-

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					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total
2011	WECC		Las Vegas Valley Water District	U.S.	5,389	5,389	-	-	966	966	-	-	4,423	4,423	-	-
2011	WECC		Lincoln County Power District No. 1	U.S.	5,369	5,369	-	-	962	962	-	-	4,407	4,407	-	-
2011	WECC		Lincoln Electric Cooperative, Inc.	U.S.	7,155	7,155	-	-	1,282	1,282	-	-	5,873	5,873	-	-
2011	WECC		Los Angeles Department of Water and Power	U.S.	1,717,320	1,717,320	-	-	307,792	307,792	-	-	1,409,528	1,409,528	-	-
2011	WECC		Majority Districts	U.S.	39,858	39,858	-	-	7,144	7,144	-	-	32,714	32,714	-	-
2011	WECC		Merced Irrigation District	U.S.	27,031	27,031	-	-	4,845	4,845	-	-	22,187	22,187	-	-
2011	WECC		Midstate Electric Cooperative, Inc.	U.S.	23,987	23,987	-	-	4,299	4,299	-	-	19,688	19,688	-	-
2011	WECC		Mission Valley Power	U.S.	23,488	23,488	-	-	4,210	4,210	-	-	19,278	19,278	-	-
2011	WECC		Modern Electric Water Company	U.S.	14,000	14,000	-	-	2,509	2,509	-	-	11,490	11,490	-	-
2011	WECC		Modesto Irrigation District	U.S.	150,207	150,207	-	-	26,921	26,921	-	-	123,286	123,286	-	-
2011	WECC		Montana-Dakota Utilities Co.	U.S.	1,008	1,008	-	-	181	181	-	-	827	827	-	-
2011	WECC		Mt. Wheeler Power	U.S.	31,620	31,620	-	-	5,667	5,667	-	-	25,953	25,953	-	-
2011	WECC		Municipal Energy Agency of Nebraska	U.S.	10,888	10,888	-	-	1,951	1,951	-	-	8,937	8,937	-	-
2011	WECC		Municipal Energy Agency of Nebraska	U.S.	1,694	1,694	-	-	304	304	-	-	1,390	1,390	-	-
2011	WECC		Navajo Tribal Utility Authority	U.S.	2,665	2,665	-	-	478	478	-	-	2,187	2,187	-	-
2011	WECC		Navajo Tribal Utility Authority	U.S.	18,646	18,646	-	-	3,342	3,342	-	-	15,304	15,304	-	-
2011	WECC		Navopache Electric Cooperative, Inc.	U.S.	25,984	25,984	-	-	4,657	4,657	-	-	21,327	21,327	-	-
2011	WECC		Nebraska Public Power Marketing	U.S.	33,062	33,062	-	-	5,926	5,926	-	-	27,136	27,136	-	-
2011	WECC		Nespelem Valley Electric Cooperative, Inc.	U.S.	3,006	3,006	-	-	539	539	-	-	2,467	2,467	-	-
2011	WECC		Nevada Power Company dba NV Energy	U.S.	1,287,507	1,287,507	-	-	230,757	230,757	-	-	1,056,750	1,056,750	-	-
2011	WECC		Noble Americas Energy Solutions, LLC	U.S.	56,656	56,656	-	-	10,154	10,154	-	-	46,501	46,501	-	-
2011	WECC		Northern Lights, Inc.	U.S.	2,159	2,159	-	-	387	387	-	-	1,772	1,772	-	-
2011	WECC		Northern Lights, Inc.	U.S.	18,110	18,110	-	-	3,246	3,246	-	-	14,864	14,864	-	-
2011	WECC		Northern Wasco County PUD	U.S.	34,051	34,051	-	-	6,103	6,103	-	-	27,948	27,948	-	-
2011	WECC		NorthWestern Corp. dba NorthWestern Energy, LLC	U.S.	535,505	535,505	-	-	95,977	95,977	-	-	439,528	439,528	-	-
2011	WECC		NorthWestern Corp. dba NorthWestern Energy, LLC	U.S.	18,171	18,171	-	-	3,257	3,257	-	-	14,915	14,915	-	-
2011	WECC		Ohop Mutual Light Company	U.S.	5,285	5,285	-	-	947	947	-	-	4,337	4,337	-	-
2011	WECC		Orcas Power and Light Cooperative	U.S.	13,038	13,038	-	-	2,337	2,337	-	-	10,701	10,701	-	-
2011	WECC		Operations Office	U.S.	11,589	11,589	-	-	2,077	2,077	-	-	9,512	9,512	-	-
2011	WECC		Oregon Trail Electric Consumers Cooperative, Inc.	U.S.	19,870	19,870	-	-	3,561	3,561	-	-	16,308	16,308	-	-
2011	WECC		Overton Power District No. 5	U.S.	22,539	22,539	-	-	4,040	4,040	-	-	18,499	18,499	-	-
2011	WECC		PacifiCorp	U.S.	3,453	3,453	-	-	619	619	-	-	2,834	2,834	-	-
2011	WECC		PacifiCorp	U.S.	125	125	-	-	22	22	-	-	102	102	-	-
2011	WECC		PacifiCorp	U.S.	2,847,510	2,847,510	-	-	510,353	510,353	-	-	2,337,157	2,337,157	-	-
2011	WECC		PacifiCorp	U.S.	107	107	-	-	19	19	-	-	88	88	-	-
2011	WECC		PacifiCorp	U.S.	226	226	-	-	40	40	-	-	185	185	-	-
2011	WECC		PacifiCorp West (PACW)	U.S.	1,242,565	1,242,565	-	-	222,702	222,702	-	-	1,019,863	1,019,863	-	-
2011	WECC		Page Electric Utility	U.S.	888	888	-	-	159	159	-	-	729	729	-	-
2011	WECC		Parkland Light and Water Company	U.S.	7,353	7,353	-	-	1,318	1,318	-	-	6,035	6,035	-	-
2011	WECC		Pend Oreille County PUD No. 1	U.S.	59,432	59,432	-	-	10,652	10,652	-	-	48,780	48,780	-	-
2011	WECC		Peninsula Light Company, Inc.	U.S.	36,901	36,901	-	-	6,614	6,614	-	-	30,287	30,287	-	-
2011	WECC		Platte River Power Authority	U.S.	193,398	193,398	-	-	34,662	34,662	-	-	158,736	158,736	-	-
2011	WECC		Port of Seattle - Seattle-Tacoma International Airpo	U.S.	8,625	8,625	-	-	1,546	1,546	-	-	7,079	7,079	-	-
2011	WECC		Port Townsend Paper Corporation	U.S.	12,043	12,043	-	-	2,158	2,158	-	-	9,885	9,885	-	-
2011	WECC		Portland General Electric Company	U.S.	2,831	2,831	-	-	507	507	-	-	2,323	2,323	-	-
2011	WECC		Portland General Electric Company	U.S.	1,134,343	1,134,343	-	-	203,306	203,306	-	-	931,037	931,037	-	-
2011	WECC		Public Service Company of Colorado (Xcel)	U.S.	1,874,451	1,874,451	-	-	335,954	335,954	-	-	1,538,497	1,538,497	-	-
2011	WECC		Public Service Company of Colorado (Xcel)	U.S.	10,238	10,238	-	-	1,835	1,835	-	-	8,403	8,403	-	-
2011	WECC		Public Service Company of New Mexico	U.S.	648,007	648,007	-	-	116,141	116,141	-	-	531,866	531,866	-	-
2011	WECC		Public Utility District No. 1 of Chelan County	U.S.	225,055	225,055	-	-	40,336	40,336	-	-	184,719	184,719	-	-
2011	WECC		PUD No. 1 of Asotin County	U.S.	267	267	-	-	48	48	-	-	219	219	-	-
2011	WECC		PUD No. 1 of Asotin County	U.S.	19	19	-	-	3	3	-	-	15	15	-	-
2011	WECC		PUD No. 1 of Benton County	U.S.	101,285	101,285	-	-	18,153	18,153	-	-	83,132	83,132	-	-
2011	WECC		PUD No. 1 of Clallam County	U.S.	41,374	41,374	-	-	7,415	7,415	-	-	33,959	33,959	-	-
2011	WECC		PUD No. 1 of Cowlitz County	U.S.	304,328	304,328	-	-	54,544	54,544	-	-	249,784	249,784	-	-
2011	WECC		PUD No. 1 of Cowlitz County	U.S.	285	285	-	-	51	51	-	-	234	234	-	-
2011	WECC		PUD No. 1 of Douglas County	U.S.	537	537	-	-	96	96	-	-	441	441	-	-
2011	WECC		PUD No. 1 of Douglas County	U.S.	85,410	85,410	-	-	15,308	15,308	-	-	70,102	70,102	-	-
2011	WECC		PUD No. 1 of Ferry County	U.S.	6,410	6,410	-	-	1,149	1,149	-	-	5,261	5,261	-	-
2011	WECC		PUD No. 1 of Franklin County	U.S.	60,999	60,999	-	-	10,933	10,933	-	-	50,066	50,066	-	-
2011	WECC		PUD No. 1 of Grays Harbor	U.S.	70,477	70,477	-	-	12,631	12,631	-	-	57,846	57,846	-	-

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					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total
2011	WECC		PUD No. 1 of Kittitas County	U.S.	4,191	4,191	-	-	751	751	-	-	3,440	3,440	-	-
2011	WECC		PUD No. 1 of Kittitas County	U.S.	469	469	-	-	84	84	-	-	385	385	-	-
2011	WECC		PUD No. 1 of Kittitas County	U.S.	1,011	1,011	-	-	181	181	-	-	830	830	-	-
2011	WECC		PUD No. 1 of Klickitat County	U.S.	15,725	15,725	-	-	2,818	2,818	-	-	12,906	12,906	-	-
2011	WECC		PUD No. 1 of Lewis County	U.S.	58,331	58,331	-	-	10,455	10,455	-	-	47,877	47,877	-	-
2011	WECC		PUD No. 1 of Mason County	U.S.	4,813	4,813	-	-	863	863	-	-	3,950	3,950	-	-
2011	WECC		PUD No. 1 of Skamania County	U.S.	8,138	8,138	-	-	1,459	1,459	-	-	6,679	6,679	-	-
2011	WECC		PUD No. 1 of Snohomish County	U.S.	428,114	428,114	-	-	76,730	76,730	-	-	351,384	351,384	-	-
2011	WECC		PUD No. 1 of Wahkiakum County	U.S.	2,709	2,709	-	-	486	486	-	-	2,224	2,224	-	-
2011	WECC		PUD No. 1 of Whatcom County	U.S.	13,087	13,087	-	-	2,346	2,346	-	-	10,742	10,742	-	-
2011	WECC		PUD No. 1 of Whatcom County	U.S.	651	651	-	-	117	117	-	-	534	534	-	-
2011	WECC		PUD No. 2 of Grant County	U.S.	5,100	5,100	-	-	914	914	-	-	4,186	4,186	-	-
2011	WECC		PUD No. 2 of Grant County	U.S.	2,912	2,912	-	-	522	522	-	-	2,390	2,390	-	-
2011	WECC		PUD No. 2 of Grant County	U.S.	235,265	235,265	-	-	42,166	42,166	-	-	193,099	193,099	-	-
2011	WECC		PUD No. 2 of Pacific County	U.S.	18,553	18,553	-	-	3,325	3,325	-	-	15,228	15,228	-	-
2011	WECC		PUD No. 3 of Mason County	U.S.	41,721	41,721	-	-	7,478	7,478	-	-	34,244	34,244	-	-
2011	WECC		Puget Sound Energy, Inc.	U.S.	1,474,638	1,474,638	-	-	264,296	264,296	-	-	1,210,342	1,210,342	-	-
2011	WECC		Rocky Mountain Generation Cooperative, Inc.	U.S.	1,967	1,967	-	-	352	352	-	-	1,614	1,614	-	-
2011	WECC		Sacramento Municipal Utility District	U.S.	666,042	666,042	-	-	119,373	119,373	-	-	546,669	546,669	-	-
2011	WECC		Salem Electric	U.S.	19,662	19,662	-	-	3,524	3,524	-	-	16,138	16,138	-	-
2011	WECC		Salt River Project	U.S.	1,696,663	1,696,663	-	-	304,089	304,089	-	-	1,392,574	1,392,574	-	-
2011	WECC		San Carlos Indian Irrigation Project	U.S.	7	7	-	-	1	1	-	-	5	5	-	-
2011	WECC		Seattle City Light	U.S.	606,228	606,228	-	-	108,653	108,653	-	-	497,575	497,575	-	-
2011	WECC		Sierra Pacific Power Company dba NV Energy	U.S.	519,695	519,695	-	-	93,144	93,144	-	-	426,551	426,551	-	-
2011	WECC		Southern Montana Electric Generation & Transmiss	U.S.	11,235	11,235	-	-	2,014	2,014	-	-	9,221	9,221	-	-
2011	WECC		Southern Montana Electric Generation & Transmiss	U.S.	41,524	41,524	-	-	7,442	7,442	-	-	34,082	34,082	-	-
2011	WECC		Southern Nevada Water Authority	U.S.	47,063	47,063	-	-	8,435	8,435	-	-	38,628	38,628	-	-
2011	WECC		Southwest Transmission Cooperative, Inc.	U.S.	160,158	160,158	-	-	28,705	28,705	-	-	131,453	131,453	-	-
2011	WECC		Springfield Utility Board	U.S.	50,410	50,410	-	-	9,035	9,035	-	-	41,375	41,375	-	-
2011	WECC		Surprise Valley Electrification Corporation	U.S.	1,837	1,837	-	-	329	329	-	-	1,508	1,508	-	-
2011	WECC		Tanner Electric Cooperative	U.S.	5,747	5,747	-	-	1,030	1,030	-	-	4,717	4,717	-	-
2011	WECC		The Incorporated County of Los Alamos	U.S.	21,948	21,948	-	-	3,934	3,934	-	-	18,014	18,014	-	-
2011	WECC		Tillamook People's Utility District	U.S.	22,488	22,488	-	-	4,031	4,031	-	-	18,458	18,458	-	-
2011	WECC		Tohono O'Odham Utility Authority	U.S.	4,110	4,110	-	-	737	737	-	-	3,373	3,373	-	-
2011	WECC		Town of Center	U.S.	623	623	-	-	112	112	-	-	511	511	-	-
2011	WECC		Town of Coulee	U.S.	1,048	1,048	-	-	188	188	-	-	860	860	-	-
2011	WECC		Town of Eatonville	U.S.	1,831	1,831	-	-	328	328	-	-	1,503	1,503	-	-
2011	WECC		Town of Fredonia	U.S.	93	93	-	-	17	17	-	-	76	76	-	-
2011	WECC		Town of Steilacoom	U.S.	2,523	2,523	-	-	452	452	-	-	2,071	2,071	-	-
2011	WECC		Town of Wickenburg	U.S.	1,694	1,694	-	-	304	304	-	-	1,390	1,390	-	-
2011	WECC		Tri-State Generation & Transmission Assoc. Inc - Rel	U.S.	123,227	123,227	-	-	22,086	22,086	-	-	101,141	101,141	-	-
2011	WECC		Tri-State Generation & Transmission Assoc. Inc - Rel	U.S.	2,623	2,623	-	-	470	470	-	-	2,153	2,153	-	-
2011	WECC		Tri-State Generation & Transmission Assoc. Inc - Rel	U.S.	1,985	1,985	-	-	356	356	-	-	1,629	1,629	-	-
2011	WECC		Tri-State Generation & Transmission Association, In	U.S.	152,827	152,827	-	-	27,391	27,391	-	-	125,436	125,436	-	-
2011	WECC		Truckee Donner Public Utility District	U.S.	9,043	9,043	-	-	1,621	1,621	-	-	7,422	7,422	-	-
2011	WECC		Tucson Electric Power Company	U.S.	808,839	808,839	-	-	144,967	144,967	-	-	663,873	663,873	-	-
2011	WECC		Turlock Irrigation District	U.S.	121,670	121,670	-	-	21,807	21,807	-	-	99,863	99,863	-	-
2011	WECC		U.S. Army Yuma Proving Ground	U.S.	267	267	-	-	48	48	-	-	219	219	-	-
2011	WECC		U.S. BOR Columbia Basin	U.S.	1,707	1,707	-	-	306	306	-	-	1,401	1,401	-	-
2011	WECC		U.S. BOR East Greenacres (Rathdrum)	U.S.	212	212	-	-	38	38	-	-	174	174	-	-
2011	WECC		U.S. Bor Spokane Indian Development	U.S.	196	196	-	-	35	35	-	-	161	161	-	-
2011	WECC		U.S. BOR The Dalles Project	U.S.	971	971	-	-	174	174	-	-	797	797	-	-
2011	WECC		U.S. DOE National Energy Technology Laboratory	U.S.	281	281	-	-	50	50	-	-	231	231	-	-
2011	WECC		Umatilla Electric Cooperative Association	U.S.	57,672	57,672	-	-	10,336	10,336	-	-	47,335	47,335	-	-
2011	WECC		Unit B Irrigation District	U.S.	1	1	-	-	0	0	-	-	1	1	-	-
2011	WECC		US Air Force Base, Fairchild	U.S.	2,972	2,972	-	-	533	533	-	-	2,439	2,439	-	-
2011	WECC		US Dept of Energy - Kirtland AFB	U.S.	25,218	25,218	-	-	4,520	4,520	-	-	20,699	20,699	-	-
2011	WECC		USN Naval Station, Bremerton	U.S.	15,294	15,294	-	-	2,741	2,741	-	-	12,553	12,553	-	-
2011	WECC		USN Naval Station, Everett	U.S.	789	789	-	-	141	141	-	-	647	647	-	-
2011	WECC		USN Submarine Base, Bangor	U.S.	10,761	10,761	-	-	1,929	1,929	-	-	8,832	8,832	-	-
2011	WECC		Valley Electric Association, Inc.	U.S.	24,604	24,604	-	-	4,410	4,410	-	-	20,195	20,195	-	-

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total ERO Assessments (NERC, RE & WIRAB Costs)				Total NERC Assessments				Total Regional Entity Assessments (Including WIRAB Assessments)			
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total
2011	WECC		Vera Water and Power	U.S.	13,801	13,801	-	-	2,474	2,474	-	-	11,327	11,327	-	-
2011	WECC		Vigilante Electric Cooperative, Inc.	U.S.	960	960	-	-	172	172	-	-	788	788	-	-
2011	WECC		Wasco Electric Cooperative	U.S.	5,707	5,707	-	-	1,023	1,023	-	-	4,684	4,684	-	-
2011	WECC		Wells Rural Electric Cooperative	U.S.	38,425	38,425	-	-	6,887	6,887	-	-	31,538	31,538	-	-
2011	WECC		Wellton-Mohawk Irrigation & Drainage District	U.S.	1,144	1,144	-	-	205	205	-	-	939	939	-	-
2011	WECC		West Oregon Electric Cooperative, Inc.	U.S.	3,269	3,269	-	-	586	586	-	-	2,683	2,683	-	-
2011	WECC		West Oregon Electric Cooperative, Inc.	U.S.	794	794	-	-	142	142	-	-	652	652	-	-
2011	WECC		Western Area Power - Loveland, CO	U.S.	20,359	20,359	-	-	3,649	3,649	-	-	16,710	16,710	-	-
2011	WECC		Western Area Power - Loveland, CO	U.S.	14,651	14,651	-	-	2,626	2,626	-	-	12,025	12,025	-	-
2011	WECC		Western Area Power Administration - CRSP	U.S.	104,727	104,727	-	-	18,770	18,770	-	-	85,957	85,957	-	-
2011	WECC		Western Area Power Administration - Sierra Nevada	U.S.	90,934	90,934	-	-	16,298	16,298	-	-	74,636	74,636	-	-
2011	WECC		Western Area Power Administration-Desert Southw	U.S.	160,341	160,341	-	-	28,738	28,738	-	-	131,604	131,604	-	-
2011	WECC		Western Area Power Administration-Upper Great Pl	U.S.	11,397	11,397	-	-	2,043	2,043	-	-	9,354	9,354	-	-
2011	WECC		Western Area Power Administration-Upper Great Pl	U.S.	87,711	87,711	-	-	15,720	15,720	-	-	71,990	71,990	-	-
2011	WECC		Western Area Power Administration-Upper Great Pl	U.S.	12,756	12,756	-	-	2,286	2,286	-	-	10,470	10,470	-	-
2011	WECC		Wyoming Municipal Power Agency	U.S.	439,692	439,692	-	-	78,805	78,805	-	-	360,887	360,887	-	-
2011	WECC		Yakama Power	U.S.	1,157	1,157	-	-	207	207	-	-	949	949	-	-
2011	WECC		Yampa Valley Electric Association	U.S.	34,847	34,847	-	-	6,246	6,246	-	-	28,601	28,601	-	-
2011	WECC		Yuma Irrigation District	U.S.	184	184	-	-	33	33	-	-	151	151	-	-
2011	WECC		Yuma-Mesa Irrigation District	U.S.	9	9	-	-	2	2	-	-	7	7	-	-
TOTAL WECC					50,517,596	43,214,609	6,593,988	708,998	9,020,357	7,745,261	1,150,409	124,686	41,497,239	35,469,348	5,443,579	584,312
TOTAL ERO					161,188,857	144,255,780	16,224,079	708,998	47,604,156	43,036,224	4,443,246	124,686	113,584,701	101,219,556	11,780,833	584,312
Summary by Regional Entity																
2011	FRCC				8,377,204	8,377,204	-	-	2,419,233	2,419,233	-	-	5,957,971	5,957,971	-	-
2011	MRO				12,222,863	10,283,622	1,939,241	-	3,123,936	2,611,375	512,561	-	9,098,927	7,672,246	1,426,681	-
2011	NPCC				18,327,625	10,636,775	7,690,849	-	5,975,361	3,195,085	2,780,276	-	12,352,264	7,441,691	4,910,573	-
2011	RFC				24,027,209	24,027,209	-	-	9,861,361	9,861,361	-	-	14,165,848	14,165,848	-	-
2011	SERC				25,069,232	25,069,232	-	-	11,239,354	11,239,354	-	-	13,829,878	13,829,878	-	-
2011	SPP				10,922,211	10,922,211	-	-	2,392,157	2,392,157	-	-	8,530,054	8,530,054	-	-
2011	TRE				11,724,917	11,724,917	-	-	3,572,397	3,572,397	-	-	8,152,520	8,152,520	-	-
2011	WECC				50,517,596	43,214,609	6,593,988	708,998	9,020,357	7,745,261	1,150,409	124,686	41,497,239	35,469,348	5,443,579	584,312
Total					161,188,857	144,255,780	16,224,079	708,998	47,604,156	43,036,224	4,443,246	124,686	113,584,701	101,219,556	11,780,833	584,312

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NERC Assessments				NERC NEL Assessments				Penalty Sanctions		NERC Compliance Credits				NERC IDC Assessments		
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total
2011	FRCC	1074	Alachua, City of	U.S.	1,382	1,382	-	-	1,403	1,403	-	-	(80)	(80)	41	41	-	-	18	18	-
2011	FRCC	1075	Bartow, City of	U.S.	2,994	2,994	-	-	3,040	3,040	-	-	(174)	(174)	89	89	-	-	39	39	-
2011	FRCC	1076	Chattahoochee, City of	U.S.	443	443	-	-	450	450	-	-	(26)	(26)	13	13	-	-	6	6	-
2011	FRCC	1077	Florida Keys Electric Cooperative Assn	U.S.	7,553	7,553	-	-	7,668	7,668	-	-	(439)	(439)	225	225	-	-	99	99	-
2011	FRCC	1078	Florida Power & Light Co.	U.S.	1,191,557	1,191,557	-	-	1,209,817	1,209,817	-	-	(69,334)	(69,334)	35,523	35,523	-	-	15,551	15,551	-
2011	FRCC	1079	Florida Public Utilities Company	U.S.	4,376	4,376	-	-	4,443	4,443	-	-	(255)	(255)	130	130	-	-	57	57	-
2011	FRCC	1080	Gainesville Regional Utilities	U.S.	19,688	19,688	-	-	19,990	19,990	-	-	(1,146)	(1,146)	587	587	-	-	257	257	-
2011	FRCC	1081	Homestead, City of	U.S.	5,348	5,348	-	-	5,430	5,430	-	-	(311)	(311)	159	159	-	-	70	70	-
2011	FRCC	1082	JEA	U.S.	135,871	135,871	-	-	137,954	137,954	-	-	(7,906)	(7,906)	4,051	4,051	-	-	1,773	1,773	-
2011	FRCC	1083	Lakeland Electric	U.S.	31,259	31,259	-	-	31,738	31,738	-	-	(1,819)	(1,819)	932	932	-	-	408	408	-
2011	FRCC	1626	Lee County Electric Cooperative, Inc	U.S.	12,727	12,727	-	-	12,922	12,922	-	-	(741)	(741)	379	379	-	-	166	166	-
2011	FRCC	1084	Mount Dora, City of	U.S.	980	980	-	-	995	995	-	-	(57)	(57)	29	29	-	-	13	13	-
2011	FRCC	1085	New Smyrna Beach, Utilities Commission of	U.S.	4,181	4,181	-	-	4,246	4,246	-	-	(243)	(243)	125	125	-	-	55	55	-
2011	FRCC	1086	Orlando Utilities Commission	U.S.	61,101	61,101	-	-	62,037	62,037	-	-	(3,555)	(3,555)	1,822	1,822	-	-	797	797	-
2011	FRCC	1087	Progress Energy Florida	U.S.	432,624	432,624	-	-	439,254	439,254	-	-	(25,174)	(25,174)	12,898	12,898	-	-	5,646	5,646	-
2011	FRCC	1088	Quincy, City of	U.S.	1,544	1,544	-	-	1,568	1,568	-	-	(90)	(90)	46	46	-	-	20	20	-
2011	FRCC	1089	Reedy Creek Improvement District	U.S.	13,052	13,052	-	-	13,252	13,252	-	-	(759)	(759)	389	389	-	-	170	170	-
2011	FRCC	1090	St. Cloud, City of (QUC)	U.S.	6,375	6,375	-	-	6,473	6,473	-	-	(371)	(371)	190	190	-	-	83	83	-
2011	FRCC	1091	Tallahassee, City of	U.S.	30,243	30,243	-	-	30,706	30,706	-	-	(1,760)	(1,760)	902	902	-	-	395	395	-
2011	FRCC	1092	Tampa Electric Company	U.S.	207,514	207,514	-	-	210,694	210,694	-	-	(12,075)	(12,075)	6,186	6,186	-	-	2,708	2,708	-
2011	FRCC	1603	City of Vero Beach	U.S.	8,006	8,006	-	-	8,129	8,129	-	-	(466)	(466)	239	239	-	-	104	104	-
2011	FRCC	1093	Wauchula, City of	U.S.	681	681	-	-	691	691	-	-	(40)	(40)	20	20	-	-	9	9	-
2011	FRCC	1094	Williston, City of	U.S.	358	358	-	-	364	364	-	-	(21)	(21)	11	11	-	-	5	5	-
2011	FRCC	1095	Winter Park, City of	U.S.	4,779	4,779	-	-	4,852	4,852	-	-	(278)	(278)	142	142	-	-	62	62	-
2011	FRCC	1072	Florida Municipal Power Agency	U.S.	65,067	65,067	-	-	66,065	66,065	-	-	(3,786)	(3,786)	1,940	1,940	-	-	849	849	-
2011	FRCC	1073	Seminole Electric Cooperative	U.S.	169,528	169,528	-	-	172,126	172,126	-	-	(9,865)	(9,865)	5,054	5,054	-	-	2,213	2,213	-
TOTAL FRCC					2,419,233	2,419,233	-	-	2,456,308	2,456,308	-	-	(140,771)	(140,771)	72,123	72,123	-	-	31,573	31,573	-
2011	MRO	1199	Basin Electric Power Cooperative	U.S.	140,893	140,893	-	-	141,259	141,259	-	-	(8,096)	(8,096)	4,148	4,148	-	-	3,582	3,582	-
2011	MRO	1201	Central Iowa Power Cooperative (CPCO)	U.S.	30,640	30,640	-	-	30,640	30,640	-	-	(1,756)	(1,756)	900	900	-	-	777	777	-
2011	MRO	1204	Corn Belt Power Cooperative	U.S.	19,386	19,386	-	-	19,436	19,436	-	-	(1,114)	(1,114)	571	571	-	-	493	493	-
2011	MRO	1207	Dairyland Power Cooperative	U.S.	57,562	57,562	-	-	57,711	57,711	-	-	(3,307)	(3,307)	1,695	1,695	-	-	1,463	1,463	-
2011	MRO	1210	Great River Energy	U.S.	147,561	147,561	-	-	147,945	147,945	-	-	(8,479)	(8,479)	4,344	4,344	-	-	3,751	3,751	-
2011	MRO	1222	Minnesota Power Cooperative, Inc.	U.S.	44,223	44,223	-	-	44,338	44,338	-	-	(2,541)	(2,541)	1,302	1,302	-	-	1,124	1,124	-
2011	MRO	1230	Nebraska Public Power District	U.S.	139,974	139,974	-	-	140,338	140,338	-	-	(8,043)	(8,043)	4,121	4,121	-	-	3,558	3,558	-
2011	MRO	1232	Omaha Public Power District	U.S.	123,585	123,585	-	-	123,906	123,906	-	-	(7,101)	(7,101)	3,638	3,638	-	-	3,142	3,142	-
2011	MRO	1237	Southern Montana Generation and Transmission	U.S.	45	45	-	-	45	45	-	-	(3)	(3)	1	1	-	-	1	1	-
2011	MRO	1240	Western Area Power Administration (UW)	U.S.	98,251	98,251	-	-	98,506	98,506	-	-	(5,645)	(5,645)	2,892	2,892	-	-	2,498	2,498	-
2011	MRO	1239	Western Area Power Administration (LM)	U.S.	1,388	1,388	-	-	1,392	1,392	-	-	(80)	(80)	41	41	-	-	35	35	-
2011	MRO	1217	Manitoba Hydro	CAN	262,505	-	262,505	-	248,887	-	248,887	-	-	-	7,308	-	7,308	-	6,310	-	6,310
2011	MRO	1235	SaskPower	CAN	250,055	-	250,055	-	237,083	-	237,083	-	-	-	6,961	-	6,961	-	6,011	-	6,011
2011	MRO	1195	Alliant Energy (Alliant East - WPL & Alliant West IPI)	U.S.	313,589	313,589	-	-	314,404	314,404	-	-	(18,018)	(18,018)	9,232	9,232	-	-	7,972	7,972	-
2011	MRO	1216	Madison, Gas and Electric	U.S.	38,112	38,112	-	-	38,211	38,211	-	-	(2,190)	(2,190)	1,122	1,122	-	-	969	969	-
2011	MRO	1220	MidAmerican Energy Company	U.S.	303,462	303,462	-	-	304,250	304,250	-	-	(17,437)	(17,437)	8,934	8,934	-	-	7,714	7,714	-
2011	MRO	1221	Minnesota Power	U.S.	144,277	144,277	-	-	144,652	144,652	-	-	(8,290)	(8,290)	4,247	4,247	-	-	3,668	3,668	-
2011	MRO	1226	Montana-Dakota Utilities Co.	U.S.	30,376	30,376	-	-	30,455	30,455	-	-	(1,745)	(1,745)	894	894	-	-	772	772	-
2011	MRO	1231	NorthWestern Energy	U.S.	16,453	16,453	-	-	16,496	16,496	-	-	(945)	(945)	484	484	-	-	418	418	-
2011	MRO	1233	Otter Tail Power Company	U.S.	47,495	47,495	-	-	47,619	47,619	-	-	(2,729)	(2,729)	1,398	1,398	-	-	1,207	1,207	-
2011	MRO	1243	Integrus Energy Group (WPS and UPPCO)	U.S.	147,673	147,673	-	-	148,057	148,057	-	-	(8,485)	(8,485)	4,347	4,347	-	-	3,754	3,754	-
2011	MRO	1244	Xcel Energy Company (NSP)	U.S.	504,970	504,970	-	-	506,283	506,283	-	-	(29,015)	(29,015)	14,866	14,866	-	-	12,837	12,837	-
2011	MRO	1196	Ames Municipal Electric System	U.S.	8,491	8,491	-	-	8,513	8,513	-	-	(488)	(488)	250	250	-	-	216	216	-
2011	MRO	1604	Atlantic Municipal Utilities	U.S.	777	777	-	-	777	777	-	-	(45)	(45)	23	23	-	-	20	20	-
2011	MRO	1476	Badger Power Marketing Authority of Wisconsin, Ir	U.S.	4,516	4,516	-	-	4,527	4,527	-	-	(259)	(259)	133	133	-	-	115	115	-
2011	MRO	1200	Cedar Falls Municipal Utilities	U.S.	5,672	5,672	-	-	5,687	5,687	-	-	(326)	(326)	167	167	-	-	144	144	-
2011	MRO	1477	Central Minnesota Municipal Power Agency (CMM)	U.S.	5,177	5,177	-	-	5,190	5,190	-	-	(297)	(297)	152	152	-	-	132	132	-
2011	MRO	1605	City of Pella	U.S.	2,173	2,173	-	-	2,178	2,178	-	-	(125)	(125)	64	64	-	-	55	55	-
2011	MRO	1203	Escanaba Municipal Electric Utility	U.S.	1,671	1,671	-	-	1,676	1,676	-	-	(96)	(96)	49	49	-	-	42	42	-
2011	MRO	1205	Falls City Water & Light Department	U.S.	618	618	-	-	620	620	-	-	(36)	(36)	18	18	-	-	16	16	-
2011	MRO	1206	Fremont Department of Utilities	U.S.	4,809	4,809	-	-	4,821	4,821	-	-	(276)	(276)	142	142	-	-	122	122	-
2011	MRO	1208	Geneseo Municipal Utilities	U.S.	736	736	-	-	738	738	-	-	(42)	(42)	22	22	-	-	19	19	-
2011	MRO	1209	Grand Island Utilities Department	U.S.	8,200	8,200	-	-	8,221	8,221	-	-	(471)	(471)	241	241	-	-	208	208	-
2011	MRO	1606	Harlan Municipal Utilities	U.S.	264	264	-	-	265	265	-	-	(15)	(15)	8	8	-	-	7	7	-
2011	MRO	1211	Hastings Utilities	U.S.	4,705	4,705	-	-	4,718	4,718	-	-	(270)	(270)	139	139	-	-	120	120	-
2011	MRO	1212	Heartland Consumers Power District	U.S.	9,312	9,312	-	-	9,336	9,336	-	-	(535)	(535)	274	274	-	-	237	237	-
2011	MRO	1213	Hutchinson Utilities Commission	U.S.	3,308	3,308	-	-	3,317	3,317	-	-	(190)	(190)	97	97	-	-	84	84	-
2011	MRO	1215	Lincoln Electric System	U.S.	35,241	35,241	-	-	35,333	35,333	-	-	(2,025)	(2,025)	1,037	1,037	-	-	896	896	-
2011	MRO	1218	Manitowoc Public Utilities	U.S.	5,879	5,879	-	-	5,894	5,894	-	-	(338)	(338)	173	173	-	-	149	149	-
2011	MRO	1223	Missouri River Energy Services	U.S.	24,474	24,474	-	-	24,537	24,537	-	-	(1,406)	(1,406)	720	720	-	-	622	622	-
2011	MRO	1224	MN Municipal Power Agency (MMPA)	U.S.	15,917	15,917	-	-	15,958	15,958	-	-	(915)	(915)	469	469	-	-	405	405	-
2011	MRO	1607	Montezuma Municipal Light & Power	U.S.	384	384	-	-	385	385	-	-	(

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NERC Assessments				NERC NEL Assessments				Penalty Sanctions		NERC Compliance Credits				NERC IDC Assessments					
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total			
2011	NPCC	1336	New England	U.S.	1,447,974	1,447,974	-	-	1,480,080	1,480,080	-	-	(84,823)	(84,823)	43,459	43,459	-	-	9,259	9,259				
2011	NPCC	1339	New York	U.S.	1,747,110	1,747,110	-	-	1,785,849	1,785,849	-	-	(102,347)	(102,347)	52,437	52,437	-	-	11,172	11,172				
2011	NPCC	1337	Ontario	Canada	1,035,450	-	1,035,450	-	1,572,539	-	1,572,539	-	-	(546,926)	-	(546,926)	-	-	9,837	-	9,837			
2011	NPCC	1341	Quebec	Canada	1,509,375	-	1,509,375	-	2,047,231	-	2,047,231	-	-	(550,663)	-	(550,663)	-	-	12,807	-	12,807			
2011	NPCC	1338	New Brunswick	Canada	100,162	-	100,162	-	152,116	-	152,116	-	-	(52,906)	-	(52,906)	-	-	952	-	952			
2011	NPCC	1340	Nova Scotia	Canada	135,289	-	135,289	-	130,636	-	130,636	-	-	-	3,836	-	3,836	-	817	-	817			
TOTAL NPCC					5,975,361	3,195,085	2,780,276	-	7,168,451	3,265,928	3,902,522	-	(187,170)	(187,170)	(1,050,764)	95,895	(1,146,659)	-	44,843	20,431	24,413			
2011	RFC	1104	Bay City	U.S.	3,594	3,594	-	-	3,651	3,651	-	-	(209)	(209)	107	107	-	-	45	-	45			
2011	RFC	1102	Cannelton Utilities	U.S.	177	177	-	-	180	180	-	-	(10)	(10)	5	5	-	-	2	-	2			
2011	RFC	1105	City of Chelsea	U.S.	1,055	1,055	-	-	1,072	1,072	-	-	(61)	(61)	31	31	-	-	13	-	13			
2011	RFC	1106	City of Croswell	U.S.	421	421	-	-	428	428	-	-	(25)	(25)	13	13	-	-	5	-	5			
2011	RFC	1108	City of Eaton Rapids	U.S.	1,052	1,052	-	-	1,069	1,069	-	-	(61)	(61)	31	31	-	-	13	-	13			
2011	RFC	1111	City of Hart	U.S.	501	501	-	-	509	509	-	-	(29)	(29)	15	15	-	-	6	-	6			
2011	RFC	1490	City of Lansing	U.S.	24,059	24,059	-	-	24,444	24,444	-	-	(1,401)	(1,401)	718	718	-	-	298	-	298			
2011	RFC	1112	City of Marquette Board of Light & Power	U.S.	3,569	3,569	-	-	3,626	3,626	-	-	(208)	(208)	106	106	-	-	44	-	44			
2011	RFC	1114	City of Portland	U.S.	388	388	-	-	394	394	-	-	(23)	(23)	12	12	-	-	5	-	5			
2011	RFC	1116	City of St. Louis	U.S.	420	420	-	-	427	427	-	-	(24)	(24)	13	13	-	-	5	-	5			
2011	RFC	1118	City of Wyandotte	U.S.	1,970	1,970	-	-	2,002	2,002	-	-	(115)	(115)	59	59	-	-	24	-	24			
2011	RFC	1120	Cloverland Electric Cooperative	U.S.	9,508	9,508	-	-	9,660	9,660	-	-	(554)	(554)	284	284	-	-	118	-	118			
2011	RFC	1122	CMS ERM Michigan LLC	U.S.	2,087	2,087	-	-	2,120	2,120	-	-	(122)	(122)	62	62	-	-	26	-	26			
2011	RFC	1124	Constellation New Energy (MECS-CONS)	U.S.	13,942	13,942	-	-	14,165	14,165	-	-	(812)	(812)	416	416	-	-	173	-	173			
2011	RFC	1123	Constellation New Energy (MECS-DET)	U.S.	13,001	13,001	-	-	13,209	13,209	-	-	(757)	(757)	388	388	-	-	161	-	161			
2011	RFC	1126	Consumers Energy Company	U.S.	362,833	362,833	-	-	368,640	368,640	-	-	(21,127)	(21,127)	10,824	10,824	-	-	4,495	-	4,495			
2011	RFC	1128	Detroit Edison Company	U.S.	489,545	489,545	-	-	497,381	497,381	-	-	(28,505)	(28,505)	14,604	14,604	-	-	6,065	-	6,065			
2011	RFC	1166	Duke Energy Indiana	U.S.	328,059	328,059	-	-	333,310	333,310	-	-	(19,102)	(19,102)	9,787	9,787	-	-	4,064	-	4,064			
2011	RFC	1135	Ferdinand Municipal Light & Water	U.S.	447	447	-	-	455	455	-	-	(26)	(26)	13	13	-	-	6	-	6			
2011	RFC		FirstEnergy Solutions (MECS-DET)	U.S.	238	238	-	-	242	242	-	-	(14)	(14)	7	7	-	-	3	-	3			
2011	RFC	1549	FirstEnergy Solutions (MECS-DET)	U.S.	21,719	21,719	-	-	22,066	22,066	-	-	(1,265)	(1,265)	648	648	-	-	269	-	269			
2011	RFC	1612	Glacial Energy (MECS-DET)	U.S.	5,021	5,021	-	-	5,102	5,102	-	-	(292)	(292)	150	150	-	-	62	-	62			
2011	RFC	1144	Holland Board of Public Works	U.S.	8,552	8,552	-	-	8,689	8,689	-	-	(498)	(498)	255	255	-	-	106	-	106			
2011	RFC	1145	Hoosier Energy	U.S.	78,406	78,406	-	-	79,661	79,661	-	-	(4,565)	(4,565)	2,339	2,339	-	-	971	-	971			
2011	RFC	1148	Indiana Municipal Power Agency (DUKE CIN)	U.S.	31,915	31,915	-	-	32,426	32,426	-	-	(1,858)	(1,858)	952	952	-	-	395	-	395			
2011	RFC	1485	Indiana Municipal Power Agency (NIPSCO)	U.S.	4,528	4,528	-	-	4,600	4,600	-	-	(264)	(264)	135	135	-	-	56	-	56			
2011	RFC	1486	Indiana Municipal Power Agency (SIGE)	U.S.	6,455	6,455	-	-	6,559	6,559	-	-	(376)	(376)	193	193	-	-	80	-	80			
2011	RFC	1149	Indianapolis Power & Light Co.	U.S.	162,841	162,841	-	-	165,448	165,448	-	-	(9,482)	(9,482)	4,858	4,858	-	-	2,017	-	2,017			
2011	RFC	1553	Integrus Energy Services (MECS-CONS)	U.S.	5,179	5,179	-	-	5,262	5,262	-	-	(302)	(302)	155	155	-	-	64	-	64			
2011	RFC	1554	Integrus Energy Services (MECS-DET)	U.S.	3,903	3,903	-	-	3,965	3,965	-	-	(227)	(227)	116	116	-	-	48	-	48			
2011	RFC	1614	Just Energy (MECS-DET)	U.S.	217	217	-	-	220	220	-	-	(13)	(13)	6	6	-	-	3	-	3			
2011	RFC	1154	Michigan Public Power Agency	U.S.	13,148	13,148	-	-	13,359	13,359	-	-	(766)	(766)	392	392	-	-	163	-	163			
2011	RFC	1155	Michigan South Central Power Agency	U.S.	6,145	6,145	-	-	6,243	6,243	-	-	(358)	(358)	183	183	-	-	76	-	76			
2011	RFC	1158	MidAmerican Energy Company Retail	U.S.	1,019	1,019	-	-	1,036	1,036	-	-	(59)	(59)	30	30	-	-	13	-	13			
2011	RFC	1163	Northern Indiana Public Service Co.	U.S.	190,577	190,577	-	-	193,628	193,628	-	-	(11,097)	(11,097)	5,685	5,685	-	-	2,361	-	2,361			
2011	RFC	1164	Ontonagon County Rural Electrification Assoc.	U.S.	314	314	-	-	319	319	-	-	(18)	(18)	9	9	-	-	4	-	4			
2011	RFC	1265	PJM Interconnection, LLC	U.S.	7,565,244	7,565,244	-	-	7,686,329	7,686,329	-	-	(440,503)	(440,503)	225,689	225,689	-	-	93,728	-	93,728			
2011	RFC	1172	Sempra Energy Solutions (MECS-CONS)	U.S.	12,289	12,289	-	-	12,486	12,486	-	-	(716)	(716)	367	367	-	-	152	-	152			
2011	RFC	1171	Sempra Energy Solutions (MECS-DET)	U.S.	10,838	10,838	-	-	11,012	11,012	-	-	(631)	(631)	323	323	-	-	134	-	134			
2011	RFC	1176	Direct Energy (Ika-Strategic Energy, LLC) (MECS-CON)	U.S.	97	97	-	-	99	99	-	-	(6)	(6)	3	3	-	-	1	-	1			
2011	RFC	1174	Direct Energy (Ika-Strategic Energy, LLC) (MECS-DET)	U.S.	3,816	3,816	-	-	3,877	3,877	-	-	(222)	(222)	114	114	-	-	47	-	47			
2011	RFC	1581	Spartan Renewable Energy	U.S.	680	680	-	-	691	691	-	-	(40)	(40)	20	20	-	-	8	-	8			
2011	RFC	1180	Thumb Electric Cooperative	U.S.	1,835	1,835	-	-	1,865	1,865	-	-	(107)	(107)	55	55	-	-	23	-	23			
2011	RFC	1627	US Department of Energy	U.S.	2,734	2,734	-	-	2,778	2,778	-	-	(159)	(159)	82	82	-	-	34	-	34			
2011	RFC	1181	Vectren Energy Delivery of IN	U.S.	63,725	63,725	-	-	64,745	64,745	-	-	(3,711)	(3,711)	1,901	1,901	-	-	790	-	790			
2011	RFC	1183	Village of Sebawaing	U.S.	407	407	-	-	414	414	-	-	(24)	(24)	12	12	-	-	5	-	5			
2011	RFC	1194	Wabash Valley Power Association Inc. (DUKE CIN)	U.S.	29,385	29,385	-	-	29,856	29,856	-	-	(1,711)	(1,711)	877	877	-	-	364	-	364			
2011	RFC	1487	Wabash Valley Power Association Inc. (MECS CON)	U.S.	1,617	1,617	-	-	1,643	1,643	-	-	(94)	(94)	48	48	-	-	20	-	20			
2011	RFC	1488	Wabash Valley Power Association Inc. (NIPSCO)	U.S.	17,773	17,773	-	-	18,057	18,057	-	-	(1,035)	(1,035)	530	530	-	-	220	-	220			
2011	RFC	1185	Wisconsin Electric Power Co.	U.S.	314,355	314,355	-	-	319,387	319,387	-	-	(18,304)	(18,304)	9,378	9,378	-	-	3,895	-	3,895			
2011	RFC	1189	Wolverine Power Marketing Cooperative	U.S.	11,317	11,317	-	-	11,499	11,499</														

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NERC Assessments				NERC NEL Assessments				Penalty Sanctions		NERC Compliance Credits				NERC IDC Assessments		
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total
2011	SERC	1278	City of Blountstown FL	U.S.	439	439	-	-	447	447	-	-	(26)	(26)	13	13			5	5	
2011	SERC	1279	City of Camden SC	U.S.	2,209	2,209	-	-	2,249	2,249	-	-	(129)	(129)	66	66			23	23	
2011	SERC	1280	City of Collins MS	U.S.	514	514	-	-	523	523	-	-	(30)	(30)	15	15			5	5	
2011	SERC	1281	City of Columbia MO	U.S.	12,786	12,786	-	-	13,018	13,018	-	-	(746)	(746)	382	382			132	132	
2011	SERC	1282	City of Conway AR (Conway Corporation)	U.S.	11,359	11,359	-	-	11,565	11,565	-	-	(663)	(663)	340	340			117	117	
2011	SERC	1284	City of Evergreen AL	U.S.	665	665	-	-	677	677	-	-	(39)	(39)	20	20			7	7	
2011	SERC	1285	City of Hampton GA	U.S.	289	289	-	-	294	294	-	-	(17)	(17)	9	9			3	3	
2011	SERC	1286	City of Hartford AL	U.S.	369	369	-	-	376	376	-	-	(22)	(22)	11	11			4	4	
2011	SERC	1287	City of Henderson (KY) Municipal Power & Light	U.S.	6,711	6,711	-	-	6,833	6,833	-	-	(392)	(392)	201	201			69	69	
2011	SERC	1288	City of North Little Rock AR (DENL)	U.S.	10,669	10,669	-	-	10,862	10,862	-	-	(623)	(623)	319	319			110	110	
2011	SERC	1289	City of Orangeburg SC Department of Public Utilities	U.S.	8,160	8,160	-	-	8,308	8,308	-	-	(476)	(476)	244	244			84	84	
2011	SERC	1290	City of Robertsdale AL	U.S.	946	946	-	-	963	963	-	-	(55)	(55)	28	28			10	10	
2011	SERC	1291	City of Ruston LA (DERS)	U.S.	3,137	3,137	-	-	3,194	3,194	-	-	(183)	(183)	94	94			32	32	
2011	SERC	1292	City of Seneca SC	U.S.	1,759	1,759	-	-	1,791	1,791	-	-	(103)	(103)	53	53			18	18	
2011	SERC	1115	City of Springfield (CWLP)	U.S.	20,190	20,190	-	-	20,557	20,557	-	-	(1,178)	(1,178)	604	604			208	208	
2011	SERC	1465	City of Thayer, MO	U.S.	219	219	-	-	223	223	-	-	(13)	(13)	7	7			2	2	
2011	SERC	1293	City of Troy AL	U.S.	4,517	4,517	-	-	4,598	4,598	-	-	(264)	(264)	135	135			47	47	
2011	SERC	1294	City of West Memphis AR (West Memphis Utilities)	U.S.	4,248	4,248	-	-	4,326	4,326	-	-	(248)	(248)	127	127			44	44	
2011	SERC	1583	Claborne Electric Cooperative, Inc.	U.S.	7,330	7,330	-	-	7,463	7,463	-	-	(428)	(428)	219	219			75	75	
2011	SERC	1584	Concordia Electric Cooperative, Inc.	U.S.	2,843	2,843	-	-	2,895	2,895	-	-	(166)	(166)	85	85			29	29	
2011	SERC	1283	Dalton Utilities	U.S.	16,385	16,385	-	-	16,682	16,682	-	-	(956)	(956)	490	490			169	169	
2011	SERC	1585	Dixie Electric Membership Corporation	U.S.	25,151	25,151	-	-	25,607	25,607	-	-	(1,468)	(1,468)	752	752			259	259	
2011	SERC	1295	Dominion Virginia Power	U.S.	906,353	906,353	-	-	922,807	922,807	-	-	(52,886)	(52,886)	27,096	27,096			9,336	9,336	
2011	SERC	1296	Duke Energy Carolinas, LLC	U.S.	897,998	897,998	-	-	914,301	914,301	-	-	(52,398)	(52,398)	26,846	26,846			9,250	9,250	
2011	SERC	1466	Durant, MS	U.S.	303	303	-	-	308	308	-	-	(18)	(18)	9	9			3	3	
2011	SERC	1478	E.ON U.S. Services Inc.	U.S.	374,478	374,478	-	-	381,277	381,277	-	-	(21,851)	(21,851)	11,195	11,195			3,857	3,857	
2011	SERC	1297	East Kentucky Power Cooperative	U.S.	134,737	134,737	-	-	137,183	137,183	-	-	(7,862)	(7,862)	4,028	4,028			1,388	1,388	
2011	SERC	1298	East Mississippi Electric Power Association	U.S.	5,128	5,128	-	-	5,221	5,221	-	-	(299)	(299)	153	153			53	53	
2011	SERC	1629	East Texas Electric Cooperative Inc	U.S.	22,627	22,627	-	-	23,037	23,037	-	-	(1,320)	(1,320)	676	676			233	233	
2011	SERC	1299	Electric Energy Inc.	U.S.	14,310	14,310	-	-	14,569	14,569	-	-	(835)	(835)	428	428			147	147	
2011	SERC	1300	EnergyUnited EMC	U.S.	27,255	27,255	-	-	27,750	27,750	-	-	(1,590)	(1,590)	815	815			281	281	
2011	SERC	1301	Entergy	U.S.	1,270,494	1,270,494	-	-	1,293,560	1,293,560	-	-	(74,134)	(74,134)	37,982	37,982			13,087	13,087	
2011	SERC	1302	Fayetteville (NC) Public Works Commission	U.S.	24,149	24,149	-	-	24,587	24,587	-	-	(1,409)	(1,409)	722	722			249	249	
2011	SERC	1303	Florida Public Utilities (FL Panhandle Load)	U.S.	3,703	3,703	-	-	3,770	3,770	-	-	(216)	(216)	111	111			38	38	
2011	SERC	1304	French Broad EMC	U.S.	6,002	6,002	-	-	6,111	6,111	-	-	(350)	(350)	179	179			62	62	
2011	SERC	1305	Georgia Power Company	U.S.	986,229	986,229	-	-	1,004,134	1,004,134	-	-	(57,547)	(57,547)	29,484	29,484			10,159	10,159	
2011	SERC	1306	Georgia System Optns Corporation	U.S.	421,786	421,786	-	-	429,443	429,443	-	-	(24,611)	(24,611)	12,609	12,609			4,345	4,345	
2011	SERC	1479	Greenwood (MS) Utilities Commission	U.S.	3,060	3,060	-	-	3,115	3,115	-	-	(179)	(179)	91	91			32	32	
2011	SERC	1307	Greenwood (SC) Commissioners of Public Works	U.S.	2,867	2,867	-	-	2,920	2,920	-	-	(167)	(167)	86	86			30	30	
2011	SERC	1308	Gulf Power Company	U.S.	132,028	132,028	-	-	134,425	134,425	-	-	(7,704)	(7,704)	3,947	3,947			1,360	1,360	
2011	SERC	1586	Haywood EMC	U.S.	3,251	3,251	-	-	3,310	3,310	-	-	(190)	(190)	97	97			33	33	
2011	SERC	1309	Illinois Municipal Electric Agency	U.S.	20,892	20,892	-	-	21,272	21,272	-	-	(1,219)	(1,219)	625	625			215	215	
2011	SERC	1480	Itta Bena, MS	U.S.	177	177	-	-	181	181	-	-	(10)	(10)	5	5			2	2	
2011	SERC	1587	Jefferson Davis Electric Cooperative, Inc.	U.S.	2,980	2,980	-	-	3,034	3,034	-	-	(174)	(174)	89	89			31	31	
2011	SERC	1617	Kentucky Municipal Power	U.S.	7,971	7,971	-	-	8,116	8,116	-	-	(465)	(465)	238	238			82	82	
2011	SERC	1481	Kosciusko, MS	U.S.	830	830	-	-	845	845	-	-	(48)	(48)	25	25			9	9	
2011	SERC	1482	Leland, MS	U.S.	371	371	-	-	378	378	-	-	(22)	(22)	11	11			4	4	
2011	SERC	1313	McCormick Commission of Public Works	U.S.	191	191	-	-	194	194	-	-	(11)	(11)	6	6			2	2	
2011	SERC	1314	Mississippi Power Company	U.S.	115,995	115,995	-	-	118,101	118,101	-	-	(6,768)	(6,768)	3,468	3,468			1,195	1,195	
2011	SERC	1630	Mt. Carmel Public Utility	U.S.	1,192	1,192	-	-	1,214	1,214	-	-	(70)	(70)	36	36			12	12	
2011	SERC	1315	Municipal Electric Authority of Georgia	U.S.	118,984	118,984	-	-	121,144	121,144	-	-	(6,943)	(6,943)	3,557	3,557			1,226	1,226	
2011	SERC	1316	N.C. Electric Membership Corp.	U.S.	133,744	133,744	-	-	136,172	136,172	-	-	(7,804)	(7,804)	3,998	3,998			1,378	1,378	
2011	SERC	1317	North Carolina Eastern Municipal Power Agency	U.S.	82,259	82,259	-	-	83,753	83,753	-	-	(4,800)	(4,800)	2,459	2,459			847	847	
2011	SERC	1318	North Carolina Municipal Power Agency #1	U.S.	51,554	51,554	-	-	52,490	52,490	-	-	(3,008)	(3,008)	1,541	1,541			531	531	
2011	SERC	1588	Northeast Louisiana Power Cooperative, Inc.	U.S.	3,237	3,237	-	-	3,296	3,296	-	-	(189)	(189)	97	97			33	33	
2011	SERC	1574	Northern Virginia Electric Cooperative	U.S.	40,574	40,574	-	-	41,310	41,310	-	-	(2,367)	(2,367)	1,213	1,213			418	418	
2011	SERC	1319	Old Dominion Electric Cooperative	U.S.	63,951	63,951	-	-	65,112	65,112	-	-	(3,732)	(3,732)	1,912	1,912			659	659	
2011	SERC	1618	Osceola (Arkansas) Municipal Light and Power	U.S.	1,965	1,965	-	-	2,000	2,000	-	-	(115)	(115)	59	59			20	20	
2011	SERC	1320	Owensboro (KY) Municipal Utilities	U.S.	9,785	9,785	-	-	9,963	9,963	-	-	(571)	(571)	293	293			101	101	
2011	SERC	1322	Piedmont EMC in Duke and Progress Areas	U.S.	5,484	5,484	-	-	5,584	5,584	-	-	(320)	(320)	164	164			56	56	
2011	SERC	1323	Piedmont Municipal Power Agency (PMPA)	U.S.	25,407	25,407	-	-	25,868	25,868	-	-	(1,483)	(1,483)	760	760			262	262	
2011	SERC	1589	Pointe Coupee Electric Memb. Corp.	U.S.	2,861	2,861	-	-	2,913	2,913	-	-	(167)	(167)	86	86			29	29	
2011	SERC	1266	PowerSouth Energy	U.S.	92,082	92,082	-	-	93,754	93,754	-	-	(5,373)	(5,373)	2,753	2,753			948	948	
2011	SERC	1330	Prairie Power, Inc.	U.S.	16,730	16,730	-	-	17,034	17,034	-	-	(976)	(976)	500	500			172	172	
2011	SERC	1324	Progress Energy Carolinas	U.S.	498,218	498,218	-	-	507,263	507,263	-	-	(29,071)	(29,071)	14,894	14,894			5,132	5,132	
2011	SERC	1325	Rutherford EMC	U.S.	14,004	14,004	-	-	14,258	14,258	-	-	(817)	(817)	419	419			144	144	
2011	SERC	1631	Sam Rayburn G&T Electric Cooperative Inc.	U.S.	20,334	20,334	-	-	20,703	20,703	-	-	(1,186)	(1,186)	608	608			209	209	
2011	SERC	1326	South Carolina Electric & Gas Company	U.S.	250,983	250,983	-	-	255,539	255,539	-	-	(14,645)	(14,645)	7,503	7,503			2,585	2,585	
2011	SERC	1327	South Carolina Public Service Authority	U.S.	121,977	121,977	-	-	124,192	124,192	-	-	(7,117)	(7,117)	3,647	3,647			1,256	1,256	
2011	SERC	1590	South Louisiana Electric Cooperative Association	U.S.	7,011	7,011	-	-	7,138	7,138	-	-	(409)	(409)	210	210			72	72	
2011	SERC	1328	South Mississippi Electric Power Association	U.S.	111,476	111,476	-	-	113,500	113,500	-	-	(6,505)	(6,505)	3,333	3,333			1,148	1,148	
2011	SERC	1329	Southern Illinois Power Cooperative	U.S.	15,839	15,839	-	-	16,127	16,127	-	-	(924)	(924)	474	474			163	163	
2011	SERC	1591</																			

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NERC Assessments				NERC NEL Assessments				Penalty Sanctions		NERC Compliance Credits				NERC IDC Assessments		
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total
2011	SERC	1593	Town of Lucama, N.C.	U.S.	226	226	-	-	231	231	-	-	(13)	(13)	7	7			2	2	
2011	SERC	1594	Town of Sharpsburg, N.C.	U.S.	220	220	-	-	224	224	-	-	(13)	(13)	7	7			2	2	
2011	SERC	1595	Town of Stantonsburg, N.C.	U.S.	248	248	-	-	252	252	-	-	(14)	(14)	7	7			3	3	
2011	SERC	1333	Town of Waynesville NC	U.S.	982	982	-	-	1,000	1,000	-	-	(57)	(57)	29	29			10	10	
2011	SERC	1334	Town of Winnsboro SC	U.S.	589	589	-	-	600	600	-	-	(34)	(34)	18	18			6	6	
2011	SERC	1335	Town of Winterville NC	U.S.	574	574	-	-	585	585	-	-	(33)	(33)	17	17			6	6	
2011	SERC	1597	Washington-St. Tammany Electric Cooperative, Inc.	U.S.	12,517	12,517	-	-	12,744	12,744	-	-	(730)	(730)	374	374			129	129	
TOTAL SERC					11,239,354	11,239,354	-	-	11,443,399	11,443,399	-	-	(655,820)	(655,820)	336,006	336,006	-	-	115,769	115,769	-

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NERC Assessments				NERC NEL Assessments				Penalty Sanctions		NERC Compliance Credits				NERC IDC Assessments		
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total
2011	SPP	1246	American Electric Power	U.S.	416,469	416,469	-	-	416,888	416,888	-	-	(23,892)	(23,892)	12,241	12,241	-	-	11,233	11,233	
2011	SPP	1435	Arkansas Electric Cooperative Corporation (AEP)	U.S.	52,196	52,196	-	-	52,248	52,248	-	-	(2,994)	(2,994)	1,534	1,534	-	-	1,408	1,408	
2011	SPP	1247	Board of Public Utilities (Kansas City KS)	U.S.	27,176	27,176	-	-	27,203	27,203	-	-	(1,559)	(1,559)	799	799	-	-	733	733	
2011	SPP	1620	Board of Public Utilities, City of McPherson, Kans	U.S.	10,117	10,117	-	-	10,128	10,128	-	-	(580)	(580)	297	297	-	-	273	273	
2011	SPP		Carthage City Water & Light	U.S.	3,152	3,152	-	-	3,155	3,155	-	-	(181)	(181)	93	93	-	-	85	85	
2011	SPP	1469	Central Valley Electric Cooperative	U.S.	8,537	8,537	-	-	8,545	8,545	-	-	(490)	(490)	251	251	-	-	230	230	
2011	SPP	1556	City of Bentonville	U.S.	6,949	6,949	-	-	6,956	6,956	-	-	(399)	(399)	204	204	-	-	187	187	
2011	SPP	1557	City of Clarksdale, Mississippi	U.S.	1,915	1,915	-	-	1,917	1,917	-	-	(110)	(110)	56	56	-	-	52	52	
2011	SPP	1633	City of Lindsborg	U.S.	347	347	-	-	347	347	-	-	(20)	(20)	10	10	-	-	9	9	
2011	SPP	1558	Hope Water & Light (HWL)	U.S.	3,282	3,282	-	-	3,285	3,285	-	-	(188)	(188)	96	96	-	-	89	89	
2011	SPP	1559	City of Minden	U.S.	1,944	1,944	-	-	1,946	1,946	-	-	(112)	(112)	57	57	-	-	52	52	
2011	SPP	1634	City of Mulvane	U.S.	500	500	-	-	501	501	-	-	(29)	(29)	15	15	-	-	13	13	
2011	SPP	1635	The City of Osage City	U.S.	396	396	-	-	396	396	-	-	(23)	(23)	12	12	-	-	11	11	
2011	SPP	1636	City of Prescott	U.S.	985	985	-	-	986	986	-	-	(57)	(57)	29	29	-	-	27	27	
2011	SPP	1248	Independence Power & Light (Independence, MO)	U.S.	12,413	12,413	-	-	12,426	12,426	-	-	(712)	(712)	365	365	-	-	335	335	
2011	SPP	1436	City Utilities of Springfield, MO	U.S.	35,895	35,895	-	-	35,931	35,931	-	-	(2,059)	(2,059)	1,055	1,055	-	-	968	968	
2011	SPP	1249	Cleco Power LLC	U.S.	131,014	131,014	-	-	131,146	131,146	-	-	(7,516)	(7,516)	3,851	3,851	-	-	3,534	3,534	
2011	SPP	1437	East Texas Electric Coop, Inc.	U.S.	4,956	4,956	-	-	4,961	4,961	-	-	(284)	(284)	146	146	-	-	134	134	
2011	SPP	1250	The Empire District Electric Company	U.S.	59,752	59,752	-	-	59,812	59,812	-	-	(3,428)	(3,428)	1,756	1,756	-	-	1,612	1,612	
2011	SPP	1470	Farmers' Electric Coop	U.S.	5,242	5,242	-	-	5,248	5,248	-	-	(301)	(301)	154	154	-	-	141	141	
2011	SPP	1438	Golden Spread Electric Coop	U.S.	63,835	63,835	-	-	63,899	63,899	-	-	(3,662)	(3,662)	1,876	1,876	-	-	1,722	1,722	
2011	SPP	1251	Grand River Dam Authority	U.S.	52,857	52,857	-	-	52,910	52,910	-	-	(3,032)	(3,032)	1,554	1,554	-	-	1,426	1,426	
2011	SPP		Jonesboro City Water & Light	U.S.	14,884	14,884	-	-	14,899	14,899	-	-	(854)	(854)	437	437	-	-	401	401	
2011	SPP	1252	Kansas City Power & Light (KCPL)	U.S.	178,035	178,035	-	-	178,214	178,214	-	-	(10,213)	(10,213)	5,233	5,233	-	-	4,802	4,802	
2011	SPP	1439	Kansas Electric Power Coop., Inc	U.S.	24,335	24,335	-	-	24,359	24,359	-	-	(1,396)	(1,396)	715	715	-	-	656	656	
2011	SPP	1440	Kansas Municipal Energy Agency (KCPL)	U.S.	8,797	8,797	-	-	8,797	8,797	-	-	(504)	(504)	258	258	-	-	237	237	
2011	SPP	1637	Kansas Power Pool	U.S.	15,682	15,682	-	-	15,698	15,698	-	-	(900)	(900)	461	461	-	-	423	423	
2011	SPP	1560	Kaw Valley Electric Cooperative, Inc.	U.S.	1,856	1,856	-	-	1,858	1,858	-	-	(106)	(106)	55	55	-	-	50	50	
2011	SPP		Kennett Board of Public Works	U.S.	1,714	1,714	-	-	1,715	1,715	-	-	(98)	(98)	50	50	-	-	46	46	
2011	SPP	1598	KCP&L GMOG (Greater Missouri Operations Comp	U.S.	97,912	97,912	-	-	98,011	98,011	-	-	(5,617)	(5,617)	2,878	2,878	-	-	2,641	2,641	
2011	SPP	1471	Lafayette Utilities System	U.S.	23,855	23,855	-	-	23,879	23,879	-	-	(1,369)	(1,369)	701	701	-	-	643	643	
2011	SPP	1472	Lea County Electric Coop	U.S.	14,418	14,418	-	-	14,433	14,433	-	-	(827)	(827)	424	424	-	-	389	389	
2011	SPP	1253	Louisiana Energy & Power Authority (LEPA)	U.S.	10,969	10,969	-	-	10,980	10,980	-	-	(629)	(629)	322	322	-	-	296	296	
2011	SPP		Malden Board of Public Works	U.S.	580	580	-	-	580	580	-	-	(33)	(33)	17	17	-	-	16	16	
2011	SPP	1441	Midwest Energy Inc.	U.S.	19,960	19,960	-	-	19,980	19,980	-	-	(1,145)	(1,145)	587	587	-	-	538	538	
2011	SPP	1443	Missouri Joint Municipal Electric Utility Commissi	U.S.	28,711	28,711	-	-	28,740	28,740	-	-	(1,647)	(1,647)	844	844	-	-	774	774	
2011	SPP	1638	Nemaha Marshall Electric Cooperative (NMEC)	U.S.	673	673	-	-	673	673	-	-	(39)	(39)	20	20	-	-	18	18	
2011	SPP	1442	Northeast Texas Electric Cooperative, Inc.	U.S.	37,363	37,363	-	-	37,400	37,400	-	-	(2,143)	(2,143)	1,098	1,098	-	-	1,008	1,008	
2011	SPP	1255	Oklahoma Gas and Electric Co.	U.S.	321,571	321,571	-	-	321,894	321,894	-	-	(18,448)	(18,448)	9,452	9,452	-	-	8,673	8,673	
2011	SPP	1444	Oklahoma Municipal Power Auth	U.S.	32,797	32,797	-	-	32,830	32,830	-	-	(1,881)	(1,881)	964	964	-	-	885	885	
2011	SPP	1639	OzMo Ozark Missouri, West Plains MO	U.S.	2,294	2,294	-	-	2,296	2,296	-	-	(132)	(132)	67	67	-	-	62	62	
2011	SPP		Paragould Light, Water & Cable	U.S.	6,612	6,612	-	-	6,619	6,619	-	-	(379)	(379)	194	194	-	-	178	178	
2011	SPP		Piggott Municipal Light, Water & Sewer	U.S.	489	489	-	-	490	490	-	-	(28)	(28)	14	14	-	-	13	13	
2011	SPP		Poplar Bluff Municipal Utilities	U.S.	4,310	4,310	-	-	4,315	4,315	-	-	(247)	(247)	127	127	-	-	116	116	
2011	SPP	1561	Public Service Commission of Yazoo City of Missis	U.S.	1,406	1,406	-	-	1,407	1,407	-	-	(81)	(81)	41	41	-	-	38	38	
2011	SPP	1473	Roosevelt County Electric Coop	U.S.	2,556	2,556	-	-	2,558	2,558	-	-	(147)	(147)	75	75	-	-	69	69	
2011	SPP	1468	Sharyland Utilities, LP	U.S.	12,000	12,000	-	-	12,013	12,013	-	-	(688)	(688)	353	353	-	-	324	324	
2011	SPP		Sikeston Board of Municipal Utilities	U.S.	4,072	4,072	-	-	4,076	4,076	-	-	(234)	(234)	120	120	-	-	110	110	
2011	SPP	1258	Southwestern Power Administration (SPA)	U.S.	2,797	2,797	-	-	2,800	2,800	-	-	(160)	(160)	82	82	-	-	75	75	
2011	SPP	1257	Southwestern Public Service Co. (SPS-XCEL)	U.S.	186,146	186,146	-	-	186,333	186,333	-	-	(10,679)	(10,679)	5,471	5,471	-	-	5,021	5,021	
2011	SPP	1256	Sunflower Electric Power Cooperative	U.S.	63,800	63,800	-	-	63,865	63,865	-	-	(3,660)	(3,660)	1,875	1,875	-	-	1,721	1,721	
2011	SPP	1445	Tex - La Electric Cooperative of Texas	U.S.	5,869	5,869	-	-	5,875	5,875	-	-	(337)	(337)	173	173	-	-	158	158	
2011	SPP	1475	Tri County Electric Coop	U.S.	4,638	4,638	-	-	4,642	4,642	-	-	(266)	(266)	136	136	-	-	125	125	
2011	SPP	1260	Westar Energy, Inc.	U.S.	241,435	241,435	-	-	241,678	241,678	-	-	(13,851)	(13,851)	7,096	7,096	-	-	6,512	6,512	
2011	SPP	1259	Western Farmers Electric Cooperative	U.S.	86,951	86,951	-	-	87,038	87,038	-	-	(4,988)	(4,988)	2,556	2,556	-	-	2,345	2,345	
2011	SPP	1501	West Texas Municipal Power Agency	U.S.	32,748	32,748	-	-	32,781	32,781	-	-	(1,879)	(1,879)	963	963	-	-	883	883	
			TOTAL SPP		2,392,157	2,392,157	-	-	2,394,559	2,394,559	-	-	(137,232)	(137,232)	70,310	70,310	-	-	64,520	64,520	
					-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
2011	TRE	1019	ERCOT	U.S.	3,572,397	3,572,397	-	-	3,675,107	3,675,107	-	-	(210,620)	(210,620)	107,910	107,910	-	-	-	-	
					3,572,397	3,572,397	-	-	3,675,107	3,675,107	-	-	(210,620)	(210,620)	107,910	107,910	-	-	-	-	
					-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
2011	WECC		Alberta Electric System Operator	Canada	466,437	-	466,437	-	644,379	-	644,379	-	-	-	(177,942)	-	(177,942)	-	-	-	
2011	WECC		British Columbia Hydro & Power Authority	Canada	683,972	-	683,972	-	664,462	-	664,462	-	-	-	-	19,510	-	19,510	-	-	
2011	WECC		Comision Federal de Electricidad	Mexico	124,686	-	-	124,686	121,130	-	-	121,130	-	-	3,557	-	-	3,557	-	-	
2011	WECC		Aha Macav Power Service	U.S.	278	278	-	-	286	286	-	-	(16)	(16)	8	8	-	-	-	-	
2011	WECC		Ajo Improvement District	U.S.	150	150	-	-	154	154	-	-	(9)	(9)	5	5	-	-	-	-	
2011	WECC		Ak-Chin	U.S.	358	358	-	-	369	369	-	-	(21)	(21)	11	11	-	-	-	-	
2011	WECC		Alcoa Inc	U.S.	34,200	34,200	-	-	35,183	35,183	-	-	(2,016)	(2,016)	1,033	1,033	-	-	-	-	
2011	WECC		Arizona Public Service Company	U.S.	326,058	326,058	-	-	335,433	335,433	-	-	(19,224)	(19,224)	9,849	9,849	-	-	-	-	
2011	WECC		Arkansas River Power Authority (ARPA)	U.S.	3,239	3,239	-	-	3,332	3,332	-	-	(191)	(191)	98	98	-	-	-	-	
2011	WECC		Avista Corporation	U.S.	99,970	99,970	-	-	102,844	102,844	-	-	(5,894)	(5,894)	3,020	3,020	-	-	-	-	
2011	WECC		Avista Corporation	U.S.	1,901	1,901	-	-	1,956	1,956	-	-	(112)	(112)	57	57	-	-	-	-	
2011	WECC		Barrick Goldstrike Mines Inc.	U.S.	12,566	12,566	-</														

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NERC Assessments				NERC NEL Assessments				Penalty Sanctions		NERC Compliance Credits				NERC IDC Assessments		
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total
2011	WECC		Big Bend Electric Cooperative, Inc.	U.S.	398	398	-	-	409	409	-	-	(23)	(23)	12	12	-	-	-	-	
2011	WECC		Blachly-Lane Electric Cooperative	U.S.	1,710	1,710	-	-	1,759	1,759	-	-	(101)	(101)	52	52	-	-	-	-	
2011	WECC		Black Hills Power	U.S.	20,092	20,092	-	-	20,669	20,669	-	-	(1,185)	(1,185)	607	607	-	-	-	-	
2011	WECC		Black Hills Power/Cheyenne Light Fuel & Power	U.S.	38,291	38,291	-	-	39,392	39,392	-	-	(2,258)	(2,258)	1,157	1,157	-	-	-	-	
2011	WECC		Bonneville Power Administration	U.S.	48,440	48,440	-	-	49,832	49,832	-	-	(2,856)	(2,856)	1,463	1,463	-	-	-	-	
2011	WECC		Bonneville Power Administration	U.S.	17,824	17,824	-	-	18,337	18,337	-	-	(1,051)	(1,051)	538	538	-	-	-	-	
2011	WECC		Bonneville Power Administration	U.S.	8,174	8,174	-	-	8,409	8,409	-	-	(482)	(482)	247	247	-	-	-	-	
2011	WECC		Bonneville Power Administration	U.S.	67	67	-	-	69	69	-	-	(4)	(4)	2	2	-	-	-	-	
2011	WECC		Bonneville Power Administration	U.S.	179	179	-	-	184	184	-	-	(11)	(11)	5	5	-	-	-	-	
2011	WECC		BPA - USBR Load	U.S.	1,423	1,423	-	-	1,464	1,464	-	-	(84)	(84)	43	43	-	-	-	-	
2011	WECC		Bureau of Reclamation (Desalter) - c/o DSW EMM	U.S.	15	15	-	-	15	15	-	-	(1)	(1)	0	0	-	-	-	-	
2011	WECC		Bureau of Reclamation (Wellfield) - c/o DSW EMM	U.S.	55	55	-	-	56	56	-	-	(3)	(3)	2	2	-	-	-	-	
2011	WECC		California Independent System Operator	U.S.	2,447,993	2,447,993	-	-	2,518,376	2,518,376	-	-	(144,328)	(144,328)	73,946	73,946	-	-	-	-	
2011	WECC		Canby Public Utility Board	U.S.	1,903	1,903	-	-	1,957	1,957	-	-	(112)	(112)	57	57	-	-	-	-	
2011	WECC		Central Arizona Water Conservation District	U.S.	19,667	19,667	-	-	20,233	20,233	-	-	(1,160)	(1,160)	594	594	-	-	-	-	
2011	WECC		Central Arizona Water Conservation District	U.S.	15,545	15,545	-	-	15,992	15,992	-	-	(917)	(917)	470	470	-	-	-	-	
2011	WECC		Central Electric Cooperative	U.S.	5,515	5,515	-	-	5,673	5,673	-	-	(325)	(325)	167	167	-	-	-	-	
2011	WECC		Central Lincoln PUD	U.S.	14,461	14,461	-	-	14,877	14,877	-	-	(853)	(853)	437	437	-	-	-	-	
2011	WECC		Central Montana Electric Power Cooperative	U.S.	327	327	-	-	337	337	-	-	(19)	(19)	10	10	-	-	-	-	
2011	WECC		Central Montana Electric Power Cooperative	U.S.	975	975	-	-	1,003	1,003	-	-	(57)	(57)	29	29	-	-	-	-	
2011	WECC		City of Aztec Electric Dept	U.S.	370	370	-	-	380	380	-	-	(22)	(22)	11	11	-	-	-	-	
2011	WECC		City of Bandon	U.S.	719	719	-	-	740	740	-	-	(42)	(42)	22	22	-	-	-	-	
2011	WECC		City of Blaine	U.S.	848	848	-	-	872	872	-	-	(50)	(50)	26	26	-	-	-	-	
2011	WECC		City of Bonners Ferry	U.S.	722	722	-	-	743	743	-	-	(43)	(43)	22	22	-	-	-	-	
2011	WECC		City of Boulder City	U.S.	1,733	1,733	-	-	1,783	1,783	-	-	(102)	(102)	52	52	-	-	-	-	
2011	WECC		City of Cascade Locks	U.S.	212	212	-	-	218	218	-	-	(13)	(13)	6	6	-	-	-	-	
2011	WECC		City of Centralia	U.S.	2,963	2,963	-	-	3,048	3,048	-	-	(175)	(175)	90	90	-	-	-	-	
2011	WECC		City of Cheney	U.S.	1,534	1,534	-	-	1,578	1,578	-	-	(90)	(90)	46	46	-	-	-	-	
2011	WECC		City of Chewelah	U.S.	261	261	-	-	269	269	-	-	(15)	(15)	8	8	-	-	-	-	
2011	WECC		City of Drain	U.S.	180	180	-	-	185	185	-	-	(11)	(11)	5	5	-	-	-	-	
2011	WECC		City of Ellensburg	U.S.	2,194	2,194	-	-	2,257	2,257	-	-	(129)	(129)	66	66	-	-	-	-	
2011	WECC		City of Fallon	U.S.	1,241	1,241	-	-	1,277	1,277	-	-	(73)	(73)	37	37	-	-	-	-	
2011	WECC		City of Forest Grove	U.S.	2,610	2,610	-	-	2,685	2,685	-	-	(154)	(154)	79	79	-	-	-	-	
2011	WECC		City of Gallup	U.S.	2,347	2,347	-	-	2,415	2,415	-	-	(138)	(138)	71	71	-	-	-	-	
2011	WECC		City of Henderson	U.S.	152	152	-	-	156	156	-	-	(9)	(9)	5	5	-	-	-	-	
2011	WECC		City of Hermiston, DBA Hermiston Energy Services	U.S.	1,166	1,166	-	-	1,200	1,200	-	-	(69)	(69)	35	35	-	-	-	-	
2011	WECC		City of Las Vegas	U.S.	489	489	-	-	503	503	-	-	(29)	(29)	15	15	-	-	-	-	
2011	WECC		City of McCleary	U.S.	320	320	-	-	329	329	-	-	(19)	(19)	10	10	-	-	-	-	
2011	WECC		City of McMinnville	U.S.	7,938	7,938	-	-	8,166	8,166	-	-	(468)	(468)	240	240	-	-	-	-	
2011	WECC		City of Mesa	U.S.	2,749	2,749	-	-	2,828	2,828	-	-	(162)	(162)	83	83	-	-	-	-	
2011	WECC		City of Milton	U.S.	679	679	-	-	699	699	-	-	(40)	(40)	21	21	-	-	-	-	
2011	WECC		City of Milton-Freewater	U.S.	1,174	1,174	-	-	1,208	1,208	-	-	(69)	(69)	35	35	-	-	-	-	
2011	WECC		City of Monmouth	U.S.	781	781	-	-	803	803	-	-	(46)	(46)	24	24	-	-	-	-	
2011	WECC		City of Needles	U.S.	339	339	-	-	348	348	-	-	(20)	(20)	10	10	-	-	-	-	
2011	WECC		City of Plummer	U.S.	376	376	-	-	387	387	-	-	(22)	(22)	11	11	-	-	-	-	
2011	WECC		City of Port Angeles	U.S.	8,056	8,056	-	-	8,288	8,288	-	-	(475)	(475)	243	243	-	-	-	-	
2011	WECC		City of Redding	U.S.	13,044	13,044	-	-	13,419	13,419	-	-	(769)	(769)	394	394	-	-	-	-	
2011	WECC		City of Richland	U.S.	9,407	9,407	-	-	9,678	9,678	-	-	(555)	(555)	284	284	-	-	-	-	
2011	WECC		City of Roseville	U.S.	8,511	8,511	-	-	8,756	8,756	-	-	(502)	(502)	257	257	-	-	-	-	
2011	WECC		City of Shasta Lake	U.S.	1,966	1,966	-	-	2,022	2,022	-	-	(116)	(116)	59	59	-	-	-	-	
2011	WECC		City of Sumas	U.S.	325	325	-	-	335	335	-	-	(19)	(19)	10	10	-	-	-	-	
2011	WECC		City of Tacoma DBA Tacoma Power	U.S.	4	4	-	-	4	4	-	-	(0)	(0)	0	0	-	-	-	-	
2011	WECC		City of Tacoma DBA Tacoma Power	U.S.	54,116	54,116	-	-	55,672	55,672	-	-	(3,191)	(3,191)	1,635	1,635	-	-	-	-	
2011	WECC		City of Troy	U.S.	195	195	-	-	201	201	-	-	(12)	(12)	6	6	-	-	-	-	
2011	WECC		City of Williams	U.S.	427	427	-	-	439	439	-	-	(25)	(25)	13	13	-	-	-	-	
2011	WECC		Clark County Water Resources	U.S.	65	65	-	-	67	67	-	-	(4)	(4)	2	2	-	-	-	-	
2011	WECC		Clark Public Utilities	U.S.	48,102	48,102	-	-	49,485	49,485	-	-	(2,836)	(2,836)	1,453	1,453	-	-	-	-	
2011	WECC		Clatskanie PUD	U.S.	8,475	8,475	-	-	8,719	8,719	-	-	(500)	(500)	256	256	-	-	-	-	
2011	WECC		Clearwater Cooperative, Inc	U.S.	1,771	1,771	-	-	1,822	1,822	-	-	(104)	(104)	54	54	-	-	-	-	
2011	WECC		Clearwater Cooperative, Inc	U.S.	427	427	-	-	439	439	-	-	(25)	(25)	13	13	-	-	-	-	
2011	WECC		Colorado River Agency-Bureau of Indian Affairs	U.S.	156	156	-	-	161	161	-	-	(9)	(9)	5	5	-	-	-	-	
2011	WECC		Colorado River Commission of Nevada	U.S.	8,542	8,542	-	-	8,787	8,787	-	-	(504)	(504)	258	258	-	-	-	-	
2011	WECC		Colorado Springs Utilities	U.S.	870	870	-	-	895	895	-	-	(51)	(51)	26	26	-	-	-	-	
2011	WECC		Colorado Springs Utilities	U.S.	213	213	-	-	219	219	-	-	(13)	(13)	6	6	-	-	-	-	
2011	WECC		Columbia Basin Electric Cooperative, Inc.	U.S.	1,137	1,137	-	-	1,170	1,170	-	-	(67)	(67)	34	34	-	-	-	-	
2011	WECC		Columbia Falls Aluminum Company	U.S.	45	45	-	-	47	47	-	-	(3)	(3)	1	1	-	-	-	-	
2011	WECC		Columbia Power Cooperative Association	U.S.	227	227	-	-	234	234	-	-	(13)	(13)	7	7	-	-	-	-	
2011	WECC		Columbia River PUD	U.S.	1,816	1,816	-	-	1,868	1,868	-	-	(107)	(107)	55	55	-	-	-	-	
2011	WECC		Columbia River PUD	U.S.	3,424	3,424	-	-	3,522	3,522	-	-	(202)	(202)	103	103	-	-	-	-	
2011	WECC		Columbia Rural Electric Association (REA)	U.S.	3,268	3,268	-	-	3,362	3,362	-	-	(193)	(193)	99	99	-	-	-	-	
2011	WECC		Consolidated Irrigation District No. 19	U.S.	60	60	-	-	62	62	-	-	(4)	(4)	2	2	-	-	-	-	
2011	WECC		Constellation New Energy, Inc.	U.S.	781	781	-	-	803	803	-	-	(46)	(46)	24	24	-	-	-	-	
2011	WECC		Consumers Power, Inc.	U.S.	4,536	4,536	-	-	4,666	4,666	-	-	(267)	(267)	137	137	-	-	-	-	
2011	WECC		Coos-Curry Electric Cooperative, Inc	U.S.	3,819	3,819	-	-	3,929	3,929	-	-	(225)	(225)	115	115	-	-	-	-	
2011	WECC		Deseret Generation & Transmission Cooperative	U.S.	48,868	48,868	-	-	50,273	50,273	-	-	(2,881)	(2,881)	1,476	1,476	-	-	-	-	
2011	WECC		Deseret Generation & Transmission Cooperative	U.S.	928	928	-	-	954	954	-	-	(55)	(55)	28	28	-	-	-	-	
2011	WECC		Douglas Electric Cooperative, Inc.	U.S.	1,026	1,026	-	-	1,056	1,056	-	-	(61)	(61)	31	31	-	-	-	-	
2011	WECC		Douglas Palisades	U.S.	191	191	-	-	197	197	-	-	(11)	(11)	6	6	-	-	-	-	

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NERC Assessments				NERC NEL Assessments				Penalty Sanctions		NERC Compliance Credits				NERC IDC Assessments		
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total
2011	WECC		El Paso Electric Company	U.S.	88,961	88,961	-	-	91,518	91,518	-	-	(5,245)	(5,245)	2,687	2,687	-	-	-	-	
2011	WECC		Electrical District #2	U.S.	1,948	1,948	-	-	2,004	2,004	-	-	(115)	(115)	59	59	-	-	-	-	
2011	WECC		Electrical District #2 - Coolidge Generating Station	U.S.	97	97	-	-	99	99	-	-	(6)	(6)	3	3	-	-	-	-	
2011	WECC		Electrical Districts 1 & 3	U.S.	7,132	7,132	-	-	7,337	7,337	-	-	(420)	(420)	215	215	-	-	-	-	
2011	WECC		Elmhurst Mutual Power & Light Company	U.S.	3,007	3,007	-	-	3,093	3,093	-	-	(177)	(177)	91	91	-	-	-	-	
2011	WECC		Emerald PUD	U.S.	7,400	7,400	-	-	7,613	7,613	-	-	(436)	(436)	224	224	-	-	-	-	
2011	WECC		Energy Northwest	U.S.	285	285	-	-	293	293	-	-	(17)	(17)	9	9	-	-	-	-	
2011	WECC		Eugene Water & Electric Board	U.S.	26,601	26,601	-	-	27,366	27,366	-	-	(1,568)	(1,568)	804	804	-	-	-	-	
2011	WECC		Farmington Electric Utility System	U.S.	11,128	11,128	-	-	11,448	11,448	-	-	(656)	(656)	336	336	-	-	-	-	
2011	WECC		Flathead Electric Cooperative, Inc	U.S.	15,446	15,446	-	-	15,890	15,890	-	-	(911)	(911)	467	467	-	-	-	-	
2011	WECC		Frederickson Power LP	U.S.	56	56	-	-	57	57	-	-	(3)	(3)	2	2	-	-	-	-	
2011	WECC		Grand Valley Power	U.S.	2,432	2,432	-	-	2,502	2,502	-	-	(143)	(143)	73	73	-	-	-	-	
2011	WECC		Harmey Electric Cooperative, Inc.	U.S.	1,184	1,184	-	-	1,218	1,218	-	-	(70)	(70)	36	36	-	-	-	-	
2011	WECC		Harmey Electric Cooperative, Inc.	U.S.	713	713	-	-	733	733	-	-	(42)	(42)	22	22	-	-	-	-	
2011	WECC		Hermiston Power LLC	U.S.	63	63	-	-	65	65	-	-	(4)	(4)	2	2	-	-	-	-	
2011	WECC		Holy Cross Energy	U.S.	7,795	7,795	-	-	8,019	8,019	-	-	(460)	(460)	235	235	-	-	-	-	
2011	WECC		Hood River Electric Cooperative	U.S.	443	443	-	-	455	455	-	-	(26)	(26)	13	13	-	-	-	-	
2011	WECC		Idaho County Light and Power Cooperative Associa	U.S.	616	616	-	-	633	633	-	-	(36)	(36)	19	19	-	-	-	-	
2011	WECC		Idaho Power Company	U.S.	159,741	159,741	-	-	164,334	164,334	-	-	(9,418)	(9,418)	4,825	4,825	-	-	-	-	
2011	WECC		Imperial Irrigation District	U.S.	38,374	38,374	-	-	39,477	39,477	-	-	(2,262)	(2,262)	1,159	1,159	-	-	-	-	
2011	WECC		Inland Power and Light Company	U.S.	4,982	4,982	-	-	5,125	5,125	-	-	(294)	(294)	150	150	-	-	-	-	
2011	WECC		Inland Power and Light Company	U.S.	5,175	5,175	-	-	5,323	5,323	-	-	(305)	(305)	156	156	-	-	-	-	
2011	WECC		Intermountain Rural Electric Association	U.S.	11,899	11,899	-	-	12,241	12,241	-	-	(702)	(702)	359	359	-	-	-	-	
2011	WECC		Kaiser Aluminum Fabricated Products LLC	U.S.	3,347	3,347	-	-	3,443	3,443	-	-	(197)	(197)	101	101	-	-	-	-	
2011	WECC		Kootenai Electric Cooperative, Inc.	U.S.	5,052	5,052	-	-	5,197	5,197	-	-	(298)	(298)	153	153	-	-	-	-	
2011	WECC		Lakeview Light & Power	U.S.	3,005	3,005	-	-	3,091	3,091	-	-	(177)	(177)	91	91	-	-	-	-	
2011	WECC		Lane Electric Cooperative, Inc.	U.S.	2,445	2,445	-	-	2,515	2,515	-	-	(144)	(144)	74	74	-	-	-	-	
2011	WECC		Las Vegas Valley Water District	U.S.	966	966	-	-	994	994	-	-	(57)	(57)	29	29	-	-	-	-	
2011	WECC		Lincoln County Power District No. 1	U.S.	962	962	-	-	990	990	-	-	(57)	(57)	29	29	-	-	-	-	
2011	WECC		Lincoln Electric Cooperative, Inc.	U.S.	1,282	1,282	-	-	1,319	1,319	-	-	(76)	(76)	39	39	-	-	-	-	
2011	WECC		Los Angeles Department of Water and Power	U.S.	307,792	307,792	-	-	316,641	316,641	-	-	(18,147)	(18,147)	9,297	9,297	-	-	-	-	
2011	WECC		Majority Districts	U.S.	7,144	7,144	-	-	7,349	7,349	-	-	(421)	(421)	216	216	-	-	-	-	
2011	WECC		Merced Irrigation District	U.S.	4,845	4,845	-	-	4,984	4,984	-	-	(286)	(286)	146	146	-	-	-	-	
2011	WECC		Midstate Electric Cooperative, Inc.	U.S.	4,299	4,299	-	-	4,423	4,423	-	-	(253)	(253)	130	130	-	-	-	-	
2011	WECC		Mission Valley Power	U.S.	4,210	4,210	-	-	4,331	4,331	-	-	(248)	(248)	127	127	-	-	-	-	
2011	WECC		Modern Electric Water Company	U.S.	2,509	2,509	-	-	2,581	2,581	-	-	(148)	(148)	76	76	-	-	-	-	
2011	WECC		Modesto Irrigation District	U.S.	26,921	26,921	-	-	27,695	27,695	-	-	(1,587)	(1,587)	813	813	-	-	-	-	
2011	WECC		Montana-Dakota Utilities Co.	U.S.	181	181	-	-	186	186	-	-	(11)	(11)	5	5	-	-	-	-	
2011	WECC		Mt. Wheeler Power	U.S.	5,667	5,667	-	-	5,830	5,830	-	-	(334)	(334)	171	171	-	-	-	-	
2011	WECC		Municipal Energy Agency of Nebraska	U.S.	1,951	1,951	-	-	2,008	2,008	-	-	(115)	(115)	59	59	-	-	-	-	
2011	WECC		Municipal Energy Agency of Nebraska	U.S.	304	304	-	-	312	312	-	-	(18)	(18)	9	9	-	-	-	-	
2011	WECC		Navajo Tribal Utility Authority	U.S.	478	478	-	-	491	491	-	-	(28)	(28)	14	14	-	-	-	-	
2011	WECC		Navajo Tribal Utility Authority	U.S.	3,342	3,342	-	-	3,438	3,438	-	-	(197)	(197)	101	101	-	-	-	-	
2011	WECC		Navapache Electric Cooperative, Inc.	U.S.	4,657	4,657	-	-	4,791	4,791	-	-	(275)	(275)	141	141	-	-	-	-	
2011	WECC		Nebraska Public Power Marketing	U.S.	5,926	5,926	-	-	6,096	6,096	-	-	(349)	(349)	179	179	-	-	-	-	
2011	WECC		Nespelem Valley Electric Cooperative, Inc.	U.S.	539	539	-	-	554	554	-	-	(32)	(32)	16	16	-	-	-	-	
2011	WECC		Nevada Power Company dba NV Energy	U.S.	230,757	230,757	-	-	237,392	237,392	-	-	(13,605)	(13,605)	6,970	6,970	-	-	-	-	
2011	WECC		Noble Americas Energy Solutions, LLC	U.S.	10,446	10,446	-	-	10,446	10,446	-	-	(599)	(599)	307	307	-	-	-	-	
2011	WECC		Northern Lights, Inc.	U.S.	387	387	-	-	398	398	-	-	(23)	(23)	12	12	-	-	-	-	
2011	WECC		Northern Lights, Inc.	U.S.	3,246	3,246	-	-	3,339	3,339	-	-	(191)	(191)	98	98	-	-	-	-	
2011	WECC		Northern Wasco County PUD	U.S.	6,103	6,103	-	-	6,278	6,278	-	-	(360)	(360)	184	184	-	-	-	-	
2011	WECC		NorthWestern Corp. dba NorthWestern Energy, LL	U.S.	95,977	95,977	-	-	98,737	98,737	-	-	(5,659)	(5,659)	2,899	2,899	-	-	-	-	
2011	WECC		NorthWestern Corp. dba NorthWestern Energy, LL	U.S.	3,257	3,257	-	-	3,350	3,350	-	-	(192)	(192)	98	98	-	-	-	-	
2011	WECC		Ohop Mutual Light Company	U.S.	947	947	-	-	974	974	-	-	(56)	(56)	29	29	-	-	-	-	
2011	WECC		Orcas Power and Light Cooperative	U.S.	2,337	2,337	-	-	2,404	2,404	-	-	(138)	(138)	71	71	-	-	-	-	
2011	WECC		Operations Office	U.S.	2,077	2,077	-	-	2,137	2,137	-	-	(122)	(122)	63	63	-	-	-	-	
2011	WECC		Oregon Trail Electric Consumers Cooperative, Inc.	U.S.	3,561	3,561	-	-	3,664	3,664	-	-	(210)	(210)	108	108	-	-	-	-	
2011	WECC		Overton Power District No. 5	U.S.	4,040	4,040	-	-	4,156	4,156	-	-	(238)	(238)	122	122	-	-	-	-	
2011	WECC		PacifiCorp	U.S.	619	619	-	-	637	637	-	-	(36)	(36)	19	19	-	-	-	-	
2011	WECC		PacifiCorp	U.S.	22	22	-	-	23	23	-	-	(1)	(1)	1	1	-	-	-	-	
2011	WECC		PacifiCorp	U.S.	510,353	510,353	-	-	525,026	525,026	-	-	(30,089)	(30,089)	15,416	15,416	-	-	-	-	
2011	WECC		PacifiCorp	U.S.	19	19	-	-	20	20	-	-	(1)	(1)	1	1	-	-	-	-	
2011	WECC		PacifiCorp	U.S.	40	40	-	-	42	42	-	-	(2)	(2)	1	1	-	-	-	-	
2011	WECC		PacifiCorp West (PACW)	U.S.	222,702	222,702	-	-	229,105	229,105	-	-	(13,130)	(13,130)	6,727	6,727	-	-	-	-	
2011	WECC		Page Electric Utility	U.S.	159	159	-	-	164	164	-	-	(9)	(9)	5	5	-	-	-	-	
2011	WECC		Parkland Light and Water Company	U.S.	1,318	1,318	-	-	1,356	1,356	-	-	(78)	(78)	40	40	-	-	-	-	
2011	WECC		Pend Oreille County PUD No. 1	U.S.	10,652	10,652	-	-	10,958	10,958	-	-	(628)	(628)	322	322	-	-	-	-	
2011	WECC		Peninsula Light Company, Inc.	U.S.	6,614	6,614	-	-	6,804	6,804	-	-	(390)	(390)	200	200	-	-	-	-	
2011	WECC		Platte River Power Authority	U.S.	34,662	34,662	-	-	35,659	35,659	-	-	(2,044)	(2,044)	1,047	1,047	-	-	-	-	
2011	WECC		Port of Seattle - Seattle-Tacoma International Airp	U.S.	1,546	1,546	-	-	1,590	1,590	-	-	(91)	(91)	47	47	-	-	-	-	
2011	WECC		Port Townsend Paper Corporation	U.S.	2,158	2,158	-	-	2,221	2,221	-	-	(127)	(127)	65	65	-	-	-	-	
2011	WECC		Portland General Electric Company	U.S.	507	507	-	-	522	522	-	-	(30)	(30)	15	15	-	-	-	-	
2011	WECC		Portland General Electric Company	U.S.	203,306	203,306	-	-	209,151	209,151	-	-	(11,986)	(11,986)	6,141	6,141	-	-	-	-	
2011	WECC		Public Service Company of Colorado (Xcel)	U.S.	335,954	335,954	-	-	345,613	345,613	-	-	(19,807)	(19,807)	10,148	10,148	-	-	-	-	
2011	WECC		Public Service Company of Colorado (Xcel)	U.S.	1,835	1,835	-	-	1,888	1,888	-	-	(108)	(108)	55	55	-	-	-	-	
2011	WECC		Public Service Company of New Mexico	U.S.	116,141	116,141	-	-	119,480	119,480	-	-	(6,847)	(6,847)	3,508	3,508	-	-	-	-	
2011	WECC		Public Utility District No. 1 of Chelan County	U.S.	40,336	40,336	-	-	41,496	41,496	-	-	(2,378)	(2,378)	1,218	1,218	-	-	-	-	
2011	WECC		PUD No. 1 of Asotin County	U.S.	48	48	-	-	49	49	-	-	(3)	(3)	1	1	-	-	-	-	

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total NERC Assessments				NERC NEL Assessments				Penalty Sanctions		NERC Compliance Credits				NERC IDC Assessments				
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total		
2011	WECC		PUD No. 1 of Asotin County	U.S.	3	3	-	-	3	3	-	-	(0)	(0)	0	0	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Benton County	U.S.	18,153	18,153	-	-	18,675	18,675	-	-	(1,070)	(1,070)	548	548	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Clallam County	U.S.	7,415	7,415	-	-	7,629	7,629	-	-	(437)	(437)	224	224	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Cowlitz County	U.S.	54,544	54,544	-	-	56,112	56,112	-	-	(3,216)	(3,216)	1,648	1,648	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Cowlitz County	U.S.	51	51	-	-	53	53	-	-	(3)	(3)	2	2	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Douglas County	U.S.	96	96	-	-	99	99	-	-	(6)	(6)	3	3	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Douglas County	U.S.	15,308	15,308	-	-	15,748	15,748	-	-	(903)	(903)	462	462	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Ferry County	U.S.	1,149	1,149	-	-	1,182	1,182	-	-	(68)	(68)	35	35	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Franklin County	U.S.	10,933	10,933	-	-	11,247	11,247	-	-	(645)	(645)	330	330	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Grays Harbor	U.S.	12,631	12,631	-	-	12,995	12,995	-	-	(745)	(745)	382	382	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Kittitas County	U.S.	751	751	-	-	773	773	-	-	(44)	(44)	23	23	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Kittitas County	U.S.	84	84	-	-	86	86	-	-	(5)	(5)	3	3	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Kittitas County	U.S.	181	181	-	-	186	186	-	-	(11)	(11)	5	5	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Klickitat County	U.S.	2,818	2,818	-	-	2,899	2,899	-	-	(166)	(166)	85	85	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Lewis County	U.S.	10,455	10,455	-	-	10,755	10,755	-	-	(616)	(616)	316	316	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Mason County	U.S.	863	863	-	-	887	887	-	-	(51)	(51)	26	26	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Skamania County	U.S.	1,459	1,459	-	-	1,500	1,500	-	-	(86)	(86)	44	44	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Snohomish County	U.S.	76,730	76,730	-	-	78,936	78,936	-	-	(4,524)	(4,524)	2,318	2,318	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Wahkiakum County	U.S.	486	486	-	-	500	500	-	-	(29)	(29)	15	15	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Whatcom County	U.S.	2,346	2,346	-	-	2,413	2,413	-	-	(138)	(138)	71	71	-	-	-	-	-	-	-
2011	WECC		PUD No. 1 of Whatcom County	U.S.	117	117	-	-	120	120	-	-	(7)	(7)	4	4	-	-	-	-	-	-	-
2011	WECC		PUD No. 2 of Grant County	U.S.	914	914	-	-	940	940	-	-	(54)	(54)	28	28	-	-	-	-	-	-	-
2011	WECC		PUD No. 2 of Grant County	U.S.	522	522	-	-	537	537	-	-	(31)	(31)	16	16	-	-	-	-	-	-	-
2011	WECC		PUD No. 2 of Grant County	U.S.	42,166	42,166	-	-	43,378	43,378	-	-	(2,486)	(2,486)	1,274	1,274	-	-	-	-	-	-	-
2011	WECC		PUD No. 2 of Pacific County	U.S.	3,325	3,325	-	-	3,421	3,421	-	-	(196)	(196)	100	100	-	-	-	-	-	-	-
2011	WECC		PUD No. 3 of Mason County	U.S.	7,478	7,478	-	-	7,693	7,693	-	-	(441)	(441)	226	226	-	-	-	-	-	-	-
2011	WECC		Puget Sound Energy, Inc.	U.S.	264,296	264,296	-	-	271,895	271,895	-	-	(15,582)	(15,582)	7,983	7,983	-	-	-	-	-	-	-
2011	WECC		Rocky Mountain Generation Cooperative, Inc.	U.S.	352	352	-	-	363	363	-	-	(21)	(21)	11	11	-	-	-	-	-	-	-
2011	WECC		Sacramento Municipal Utility District	U.S.	119,373	119,373	-	-	122,805	122,805	-	-	(7,038)	(7,038)	3,606	3,606	-	-	-	-	-	-	-
2011	WECC		Salem Electric	U.S.	3,524	3,524	-	-	3,625	3,625	-	-	(208)	(208)	106	106	-	-	-	-	-	-	-
2011	WECC		Salt River Project	U.S.	304,089	304,089	-	-	312,832	312,832	-	-	(17,928)	(17,928)	9,186	9,186	-	-	-	-	-	-	-
2011	WECC		San Carlos Indian Irrigation Project	U.S.	1	1	-	-	1	1	-	-	(0)	(0)	0	0	-	-	-	-	-	-	-
2011	WECC		Seattle City Light	U.S.	108,653	108,653	-	-	111,777	111,777	-	-	(6,406)	(6,406)	3,282	3,282	-	-	-	-	-	-	-
2011	WECC		Sierra Pacific Power Company dba NV Energy	U.S.	93,144	93,144	-	-	95,822	95,822	-	-	(5,492)	(5,492)	2,814	2,814	-	-	-	-	-	-	-
2011	WECC		Southern Montana Electric Generation & Transmis:	U.S.	2,014	2,014	-	-	2,071	2,071	-	-	(119)	(119)	61	61	-	-	-	-	-	-	-
2011	WECC		Southern Montana Electric Generation & Transmis:	U.S.	7,442	7,442	-	-	7,656	7,656	-	-	(439)	(439)	225	225	-	-	-	-	-	-	-
2011	WECC		Southern Nevada Water Authority	U.S.	8,435	8,435	-	-	8,678	8,678	-	-	(497)	(497)	255	255	-	-	-	-	-	-	-
2011	WECC		Southwest Transmission Cooperative, Inc.	U.S.	28,705	28,705	-	-	29,530	29,530	-	-	(1,692)	(1,692)	867	867	-	-	-	-	-	-	-
2011	WECC		Springfield Utility Board	U.S.	9,035	9,035	-	-	9,295	9,295	-	-	(533)	(533)	273	273	-	-	-	-	-	-	-
2011	WECC		Surprise Valley Electrification Corporation	U.S.	329	329	-	-	339	339	-	-	(19)	(19)	10	10	-	-	-	-	-	-	-
2011	WECC		Tanner Electric Cooperative	U.S.	1,030	1,030	-	-	1,060	1,060	-	-	(61)	(61)	31	31	-	-	-	-	-	-	-
2011	WECC		The Incorporated County of Los Alamos	U.S.	3,934	3,934	-	-	4,047	4,047	-	-	(232)	(232)	119	119	-	-	-	-	-	-	-
2011	WECC		Tillamook People's Utility District	U.S.	4,031	4,031	-	-	4,146	4,146	-	-	(238)	(238)	122	122	-	-	-	-	-	-	-
2011	WECC		Tohono O'Dham Utility Authority	U.S.	737	737	-	-	758	758	-	-	(43)	(43)	22	22	-	-	-	-	-	-	-
2011	WECC		Town of Center	U.S.	112	112	-	-	115	115	-	-	(7)	(7)	3	3	-	-	-	-	-	-	-
2011	WECC		Town of Coulee	U.S.	188	188	-	-	193	193	-	-	(11)	(11)	6	6	-	-	-	-	-	-	-
2011	WECC		Town of Eatonville	U.S.	328	328	-	-	338	338	-	-	(19)	(19)	10	10	-	-	-	-	-	-	-
2011	WECC		Town of Fredonia	U.S.	17	17	-	-	17	17	-	-	(1)	(1)	1	1	-	-	-	-	-	-	-
2011	WECC		Town of Stellaocom	U.S.	452	452	-	-	465	465	-	-	(27)	(27)	14	14	-	-	-	-	-	-	-
2011	WECC		Town of Wickenburg	U.S.	304	304	-	-	312	312	-	-	(18)	(18)	9	9	-	-	-	-	-	-	-
2011	WECC		Tri-State Generation & Transmission Assoc. Inc - R	U.S.	22,086	22,086	-	-	22,721	22,721	-	-	(1,302)	(1,302)	667	667	-	-	-	-	-	-	-
2011	WECC		Tri-State Generation & Transmission Assoc. Inc - R	U.S.	470	470	-	-	484	484	-	-	(28)	(28)	14	14	-	-	-	-	-	-	-
2011	WECC		Tri-State Generation & Transmission Assoc. Inc - R	U.S.	356	356	-	-	366	366	-	-	(21)	(21)	11	11	-	-	-	-	-	-	-
2011	WECC		Tri-State Generation & Transmission Association, I	U.S.	27,391	27,391	-	-	28,178	28,178	-	-	(1,615)	(1,615)	827	827	-	-	-	-	-	-	-
2011	WECC		Truckee Donner Public Utility District	U.S.	1,621	1,621	-	-	1,667	1,667	-	-	(96)	(96)	49	49	-	-	-	-	-	-	-
2011	WECC		Tucson Electric Power Company	U.S.	144,967	144,967	-	-	149,134	149,134	-	-	(8,547)	(8,547)	4,379	4,379	-	-	-	-	-	-	-
2011	WECC		Turlock Irrigation District	U.S.	21,807	21,807	-	-	22,434	22,434	-	-	(1,286)	(1,286)	659	659	-	-	-	-	-	-	-
2011	WECC		U.S. Army Yuma Proving Ground	U.S.	48	48	-	-	49	49	-	-	(3)	(3)	1	1	-	-	-	-	-	-	-
2011	WECC		U.S. BOR Columbia Basin	U.S.	306	306	-	-	315	315	-	-	(18)	(18)	9	9	-	-	-	-	-	-	-
2011	WECC		U.S. BOR East Greenacres (Rathdrum)	U.S.	38	38	-	-	39	39	-	-	(2)	(2)	1	1	-	-	-	-	-	-	-
2011	WECC		U.S. Bor Spokane Indian Development'	U.S.	35	35	-	-	36	36	-	-	(2)	(2)	1	1	-	-	-	-	-	-	-
2011	WECC		U.S. BOR The Dalles Project	U.S.	174	174	-	-	179	179	-	-	(10)	(10)	5	5	-	-	-	-	-	-	-
2011	WECC		U.S. DOE National Energy Technology Laboratory	U.S.	50	50	-	-	52	52	-	-	(3)	(3)	2	2	-	-	-	-	-	-	-
2011	WECC		Umatilla Electric Cooperative Association	U.S.	10,336	10,336	-	-	10,634	10,634	-	-	(609)	(609)	312	312	-	-	-	-	-	-	-
2011	WECC		Unit B Irrigation District	U.S.	0	0	-	-	0	0	-	-	(0)	(0)	0	0	-	-	-	-	-	-	-
2011	WECC		US Air Force Base, Fairchild	U.S.	533	533	-	-	548	548	-	-	(31)	(31)	16	16	-	-	-	-	-	-	-
2011	WECC		US Dept of Energy - Kirtland AFB	U.S.	4,520	4,520	-	-	4,650	4,650	-	-	(266)	(266)	137	137	-	-	-	-	-	-	-
2011	WECC		USN Naval Station, Bremerton	U.S.	2,741	2,741	-	-	2,820	2,820	-	-	(162)	(162)	83	83	-	-	-	-	-	-	-
2011	WECC		USN Naval Station, Everett	U.S.	141	141	-	-	145	145	-	-	(8)	(8)	4	4	-	-	-	-	-	-	-
2011	WECC		USN Submarine Base, Bangor	U.S.	1,929	1,929	-	-	1,984	1,984	-	-	(114)	(114)	58	58	-	-	-	-	-	-	-
2011	WECC		Valley Electric Association, Inc.	U.S.	4,410	4,410	-	-	4,537	4,537	-	-	(260)	(260)	133	133	-	-	-	-	-	-	-
2011	WECC		Vera Water and Power	U.S.	2,474	2,474	-	-	2,545	2,545	-	-	(146)	(146)	75	75	-	-					

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Data Year	Regional Entity	ID	Entity	Country	Total NERC Assessments				NERC NEL Assessments				Penalty Sanctions		NERC Compliance Credits				NERC IDC Assessments		
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total
2011	WECC		Western Area Power - Loveland, CO	U.S.	3,649	3,649	-	-	3,754	3,754	-	-	(215)	(215)	110	110	-	-	-	-	-
2011	WECC		Western Area Power - Loveland, CO	U.S.	2,626	2,626	-	-	2,701	2,701	-	-	(155)	(155)	79	79	-	-	-	-	-
2011	WECC		Western Area Power Administration - CRSP	U.S.	18,770	18,770	-	-	19,310	19,310	-	-	(1,107)	(1,107)	567	567	-	-	-	-	-
2011	WECC		Western Area Power Administration - Sierra Nevad	U.S.	16,298	16,298	-	-	16,766	16,766	-	-	(961)	(961)	492	492	-	-	-	-	-
2011	WECC		Western Area Power Administration-Desert South	U.S.	28,738	28,738	-	-	29,564	29,564	-	-	(1,694)	(1,694)	868	868	-	-	-	-	-
2011	WECC		Western Area Power Administration-Upper Great F	U.S.	2,043	2,043	-	-	2,101	2,101	-	-	(120)	(120)	62	62	-	-	-	-	-
2011	WECC		Western Area Power Administration-Upper Great F	U.S.	15,720	15,720	-	-	16,172	16,172	-	-	(927)	(927)	475	475	-	-	-	-	-
2011	WECC		Western Area Power Administration-Upper Great F	U.S.	2,286	2,286	-	-	2,352	2,352	-	-	(135)	(135)	69	69	-	-	-	-	-
2011	WECC		Wyoming Municipal Power Agency	U.S.	78,805	78,805	-	-	81,071	81,071	-	-	(4,646)	(4,646)	2,380	2,380	-	-	-	-	-
2011	WECC		Yakama Power	U.S.	207	207	-	-	213	213	-	-	(12)	(12)	6	6	-	-	-	-	-
2011	WECC		Yampa Valley Electric Association	U.S.	6,246	6,246	-	-	6,425	6,425	-	-	(368)	(368)	189	189	-	-	-	-	-
2011	WECC		Yuma Irrigation District	U.S.	33	33	-	-	34	34	-	-	(2)	(2)	1	1	-	-	-	-	-
2011	WECC		Yuma-Mesa Irrigation District	U.S.	2	2	-	-	2	2	-	-	(0)	(0)	0	0	-	-	-	-	-
TOTAL WECC					9,020,357	7,745,261	1,150,409	124,686	9,397,916	7,967,946	1,308,841	121,130	(456,642)	(456,642)	79,083	233,958	(158,432)	3,557	-	-	-
TOTAL ERO					47,604,156	43,036,224	4,443,246	124,686	49,659,070	43,840,607	5,697,333	121,130	(2,512,500)	(2,512,500)	-	1,287,265	(1,290,822)	3,557	457,586	420,851	36,735
Summary by Regional Entity																					
2011	FRCC				2,419,233	2,419,233	-	-	2,456,308	2,456,308	-	-	(140,771)	(140,771)	72,123	72,123	-	-	31,573	31,573	-
2011	MRO				3,123,936	2,611,375	512,561	-	3,104,133	2,618,163	485,970	-	(150,047)	(150,047)	91,145	76,876	14,269	-	78,705	66,383	12,322
2011	NPCC				5,975,361	3,195,085	2,780,276	-	7,168,451	3,265,928	3,902,522	-	(187,170)	(187,170)	(1,050,764)	95,895	(1,146,659)	-	44,843	20,431	24,413
2011	RFC				9,861,361	9,861,361	-	-	10,019,197	10,019,197	-	-	(574,199)	(574,199)	294,188	294,188	-	-	122,175	122,175	-
2011	SERC				11,239,354	11,239,354	-	-	11,443,399	11,443,399	-	-	(655,820)	(655,820)	336,006	336,006	-	-	115,769	115,769	-
2011	SPP				2,392,157	2,392,157	-	-	2,394,559	2,394,559	-	-	(137,232)	(137,232)	70,310	70,310	-	-	64,520	64,520	-
2011	TRE				3,572,397	3,572,397	-	-	3,675,107	3,675,107	-	-	(210,620)	(210,620)	107,910	107,910	-	-	-	-	-
2011	WECC				9,020,357	7,745,261	1,150,409	124,686	9,397,916	7,967,946	1,308,841	121,130	(456,642)	(456,642)	79,083	233,958	(158,432)	3,557	-	-	-
Total					47,604,156	43,036,224	4,443,246	124,686	49,659,070	43,840,607	5,697,333	121,130	(2,512,500)	(2,512,500)	-	1,287,265	(1,290,822)	3,557	457,586	420,851	36,735

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total Regional Entity Assessments (Including WRAB Assessments)				Regional Entity NEL Assessments				Penalty Sanctions - US Only		NPCC 40% CORC excluding US Only Staff			NPCC 60% CORC Program				WECC Compliance Assessments (ex.AESO)				WRAB Assessments			
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Total	US Total	Canada Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total
2011	RFC	1120	Cloverland Electric Cooperative	U.S.	13,658	13,658	-	-	16,531	16,531	-	-	(2,873)	(2,873)															
2011	RFC	1122	CMS ERM Michigan LLC	U.S.	2,998	2,998	-	-	3,628	3,628	-	-	(631)	(631)															
2011	RFC	1124	Constellation New Energy (MECS-CONS)	U.S.	20,027	20,027	-	-	24,240	24,240	-	-	(4,213)	(4,213)															
2011	RFC	1123	Constellation New Energy (MECS-DET)	U.S.	18,676	18,676	-	-	22,604	22,604	-	-	(3,928)	(3,928)															
2011	RFC	1126	Consumers Energy Company	U.S.	521,210	521,210	-	-	630,847	630,847	-	-	(109,637)	(109,637)															
2011	RFC	1128	Detroit Edison Company	U.S.	703,232	703,232	-	-	851,157	851,157	-	-	(147,925)	(147,925)															
2011	RFC	1166	Duke Energy Indiana	U.S.	471,257	471,257	-	-	570,387	570,387	-	-	(99,129)	(99,129)															
2011	RFC	1135	Ferdinand Municipal Light & Water	U.S.	643	643	-	-	778	778	-	-	(135)	(135)															
2011	RFC		FirstEnergy Solutions (MECS-DET)	U.S.	342	342	-	-	414	414	-	-	(72)	(72)															
2011	RFC	1549	FirstEnergy Solutions (MECS-DET)	U.S.	31,199	31,199	-	-	37,762	37,762	-	-	(6,563)	(6,563)															
2011	RFC	1612	Glacial Energy (MECS-DET)	U.S.	7,213	7,213	-	-	8,731	8,731	-	-	(1,517)	(1,517)															
2011	RFC	1144	Holland Board of Public Works	U.S.	12,285	12,285	-	-	14,869	14,869	-	-	(2,584)	(2,584)															
2011	RFC	1145	Hoosier Energy	U.S.	112,630	112,630	-	-	136,322	136,322	-	-	(23,692)	(23,692)															
2011	RFC	1148	Indiana Municipal Power Agency (DUKE CN)	U.S.	45,846	45,846	-	-	55,490	55,490	-	-	(9,644)	(9,644)															
2011	RFC	1485	Indiana Municipal Power Agency (NIPSCO)	U.S.	6,504	6,504	-	-	7,873	7,873	-	-	(1,368)	(1,368)															
2011	RFC	1486	Indiana Municipal Power Agency (SIGE)	U.S.	9,273	9,273	-	-	11,224	11,224	-	-	(1,951)	(1,951)															
2011	RFC	1149	Indianapolis Power & Light Co.	U.S.	233,921	233,921	-	-	283,127	283,127	-	-	(49,206)	(49,206)															
2011	RFC	1553	Integrus Energy Services (MECS-CONS)	U.S.	7,440	7,440	-	-	9,005	9,005	-	-	(1,565)	(1,565)															
2011	RFC	1554	Integrus Energy Services (MECS-DET)	U.S.	5,607	5,607	-	-	6,786	6,786	-	-	(1,179)	(1,179)															
2011	RFC	1614	Just Energy (MECS-DET)	U.S.	312	312	-	-	377	377	-	-	(66)	(66)															
2011	RFC	1154	Michigan Public Power Agency	U.S.	18,887	18,887	-	-	22,860	22,860	-	-	(3,973)	(3,973)															
2011	RFC	1155	Michigan South Central Power Agency	U.S.	8,827	8,827	-	-	10,684	10,684	-	-	(1,857)	(1,857)															
2011	RFC	1158	MidAmerican Energy Company Retail	U.S.	1,464	1,464	-	-	1,772	1,772	-	-	(308)	(308)															
2011	RFC	1163	Northern Indiana Public Service Co.	U.S.	273,765	273,765	-	-	331,351	331,351	-	-	(57,587)	(57,587)															
2011	RFC	1164	Ontonagon County Rural Electrification Assoc.	U.S.	451	451	-	-	546	546	-	-	(95)	(95)															
2011	RFC	1265	PJM Interconnection, LLC	U.S.	10,867,474	10,867,474	-	-	13,153,458	13,153,458	-	-	(2,285,984)	(2,285,984)															
2011	RFC	1172	Sempra Energy Solutions (MECS-CONS)	U.S.	17,654	17,654	-	-	21,367	21,367	-	-	(3,713)	(3,713)															
2011	RFC	1171	Sempra Energy Solutions (MECS-DET)	U.S.	15,569	15,569	-	-	18,844	18,844	-	-	(3,275)	(3,275)															
2011	RFC	1176	Direct Energy (IkaStrategic Energy,LLC) (MECS-CON)	U.S.	140	140	-	-	169	169	-	-	(29)	(29)															
2011	RFC	1174	Direct Energy (IkaStrategic Energy,LLC) (MECS-DET)	U.S.	5,482	5,482	-	-	6,635	6,635	-	-	(1,153)	(1,153)															
2011	RFC	1581	Spartan Renewable Energy	U.S.	977	977	-	-	1,182	1,182	-	-	(205)	(205)															
2011	RFC	1180	Thumb Electric Cooperative	U.S.	2,636	2,636	-	-	3,191	3,191	-	-	(555)	(555)															
2011	RFC	1627	US Department of Energy	U.S.	3,927	3,927	-	-	4,753	4,753	-	-	(826)	(826)															
2011	RFC	1181	Vectren Energy Delivery of IN	U.S.	91,541	91,541	-	-	110,796	110,796	-	-	(19,256)	(19,256)															
2011	RFC	1183	Village of Sebewaing	U.S.	585	585	-	-	708	708	-	-	(123)	(123)															
2011	RFC	1184	Walsh Valley Power Association Inc. (DUKE CN)	U.S.	42,212	42,212	-	-	51,091	51,091	-	-	(8,879)	(8,879)															
2011	RFC	1487	Walsh Valley Power Association Inc. (MECS CONS)	U.S.	2,323	2,323	-	-	2,812	2,812	-	-	(489)	(489)															
2011	RFC	1488	Walsh Valley Power Association Inc. (NIPSCO)	U.S.	25,531	25,531	-	-	30,901	30,901	-	-	(5,370)	(5,370)															
2011	RFC	1185	Wisconsin Electric Power Co.	U.S.	451,572	451,572	-	-	546,560	546,560	-	-	(94,989)	(94,989)															
2011	RFC	1189	Wolverine Power Marketing Cooperative	U.S.	16,258	16,258	-	-	19,677	19,677	-	-	(3,420)	(3,420)															
2011	RFC	1191	Wolverine Power Supply Cooperative	U.S.	38,862	38,862	-	-	47,036	47,036	-	-	(8,175)	(8,175)															
2011	RFC	1190	Wolverine Power Marketing Cooperative	U.S.	1,993	1,993	-	-	2,413	2,413	-	-	(419)	(419)															
TOTAL RELIABILITYFIRST					14,165,848	14,165,848	-	-	17,145,648	17,145,648	-	-	(2,979,800)	(2,979,800)															
2011	SERC	1267	Alabama Municipal Electric Authority	U.S.	47,518	47,518	-	-	47,693	47,693	-	-	(175)	(175)															
2011	SERC	1268	Alabama Power Company	U.S.	805,614	805,614	-	-	808,585	808,585	-	-	(2,971)	(2,971)															
2011	SERC	1269	Ameren - Illinois	U.S.	572,388	572,388	-	-	574,499	574,499	-	-	(2,111)	(2,111)															
2011	SERC	1271	Ameren - Missouri	U.S.	561,158	561,158	-	-	563,227	563,227	-	-	(2,069)	(2,069)															
2011	SERC	1272	APGI - Yadkin Division	U.S.	314	314	-	-	315	315	-	-	(1)	(1)															
2011	SERC	1273	Associated Electric Cooperative Inc.	U.S.	259,929	259,929	-	-	260,888	260,888	-	-	(959)	(959)															
2011	SERC	1582	Beauregard Electric Cooperative, Inc.	U.S.	14,566	14,566	-	-	14,620	14,620	-	-	(54)	(54)															
2011	SERC	1462	Benton Utility District	U.S.	3,859	3,859	-	-	3,873	3,873	-	-	(14)	(14)															
2011	SERC	1274	Big Rivers Electric Corporation	U.S.	141,855	141,855	-	-	142,378	142,378	-	-	(523)	(523)															
2011	SERC	1275	Black Warrior EMC	U.S.	5,871	5,871	-	-	5,893	5,893	-	-	(22)	(22)															
2011	SERC	1276	Blue Ridge EMC	U.S.	18,469	18,469	-	-	18,538	18,538	-	-	(68)	(68)															
2011	SERC	1628	Brazos Electric Power Cooperative, Inc.	U.S.	5,651	5,651	-	-	5,672	5,672	-	-	(21)	(21)															
2011	SERC	1463	Canton, MS	U.S.	1,720	1,720	-	-	1,727	1,727	-	-	(6)	(6)															
2011	SERC	1277	Central Electric Power Cooperative Inc.	U.S.																									

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total Regional Entity Assessments (Including WRAB Assessments)				Regional Entity NEL Assessments				Penalty Sanctions - US Only		NPCC 40% CORC excluding US Only Staff			NPCC 60% CORC Program			WECC Compliance Assessments (ex.AESO)				WRAB Assessments				
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Total	US Total	Canada Total	Total	US Total	Canada Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	
2011	WECC		City of Aitec Electric Dept	U.S.	1,694	1,694	-	-	1,778	1,778	-	-	(142)	(142)									35	35				22	22
2011	WECC		City of Bandon	U.S.	3,292	3,292	-	-	3,457	3,457	-	-	(275)	(275)									68	68				42	42
2011	WECC		City of Blaine	U.S.	3,883	3,883	-	-	4,077	4,077	-	-	(325)	(325)									81	81				50	50
2011	WECC		City of Bonners Ferry	U.S.	3,305	3,305	-	-	3,471	3,471	-	-	(276)	(276)									69	69				42	42
2011	WECC		City of Boulder City	U.S.	7,938	7,938	-	-	8,335	8,335	-	-	(664)	(664)									165	165				101	101
2011	WECC		City of Cascade Locks	U.S.	971	971	-	-	1,020	1,020	-	-	(81)	(81)									20	20				12	12
2011	WECC		City of Centralia	U.S.	13,569	13,569	-	-	14,248	14,248	-	-	(1,135)	(1,135)									282	282				173	173
2011	WECC		City of Cheney	U.S.	7,026	7,026	-	-	7,378	7,378	-	-	(588)	(588)									146	146				90	90
2011	WECC		City of Chewelah	U.S.	1,197	1,197	-	-	1,256	1,256	-	-	(100)	(100)									25	25				15	15
2011	WECC		City of Drain	U.S.	824	824	-	-	866	866	-	-	(69)	(69)									17	17				11	11
2011	WECC		City of Eblensburg	U.S.	10,048	10,048	-	-	10,551	10,551	-	-	(840)	(840)									209	209				128	128
2011	WECC		City of Fallon	U.S.	5,683	5,683	-	-	5,967	5,967	-	-	(475)	(475)									118	118				73	73
2011	WECC		City of Forest Grove	U.S.	11,950	11,950	-	-	12,548	12,548	-	-	(1,000)	(1,000)									249	249				153	153
2011	WECC		City of Gallup	U.S.	10,750	10,750	-	-	11,288	11,288	-	-	(899)	(899)									224	224				137	137
2011	WECC		City of Henderson	U.S.	694	694	-	-	729	729	-	-	(58)	(58)									14	14				9	9
2011	WECC		City of Hermiston, DBA Hermiston Energy Services	U.S.	5,341	5,341	-	-	5,609	5,609	-	-	(447)	(447)									111	111				68	68
2011	WECC		City of Las Vegas	U.S.	2,237	2,237	-	-	2,349	2,349	-	-	(187)	(187)									47	47				29	29
2011	WECC		City of McCreary	U.S.	1,466	1,466	-	-	1,540	1,540	-	-	(123)	(123)									30	30				19	19
2011	WECC		City of McMinnville	U.S.	36,353	36,353	-	-	38,173	38,173	-	-	(1,041)	(1,041)									756	756				465	465
2011	WECC		City of Mesa	U.S.	12,589	12,589	-	-	13,219	13,219	-	-	(1,053)	(1,053)									262	262				161	161
2011	WECC		City of Milton	U.S.	3,112	3,112	-	-	3,268	3,268	-	-	(260)	(260)									65	65				40	40
2011	WECC		City of Milton-Freewater	U.S.	5,378	5,378	-	-	5,647	5,647	-	-	(450)	(450)									112	112				69	69
2011	WECC		City of Mommouth	U.S.	3,575	3,575	-	-	3,754	3,754	-	-	(299)	(299)									74	74				46	46
2011	WECC		City of Needles	U.S.	1,551	1,551	-	-	1,629	1,629	-	-	(130)	(130)									32	32				20	20
2011	WECC		City of Plummer	U.S.	1,723	1,723	-	-	1,809	1,809	-	-	(144)	(144)									36	36				22	22
2011	WECC		City of Port Angeles	U.S.	36,893	36,893	-	-	38,740	38,740	-	-	(3,086)	(3,086)									767	767				472	472
2011	WECC		City of Redding	U.S.	59,735	59,735	-	-	62,726	62,726	-	-	(4,997)	(4,997)									1,242	1,242				763	763
2011	WECC		City of Richland	U.S.	43,081	43,081	-	-	45,238	45,238	-	-	(1,604)	(1,604)									896	896				551	551
2011	WECC		City of Roseville	U.S.	38,978	38,978	-	-	40,930	40,930	-	-	(3,260)	(3,260)									811	811				498	498
2011	WECC		City of Shaasta Lake	U.S.	9,002	9,002	-	-	9,453	9,453	-	-	(753)	(753)									187	187				115	115
2011	WECC		City of Sumas	U.S.	1,490	1,490	-	-	1,565	1,565	-	-	(125)	(125)									31	31				19	19
2011	WECC		City of Tacoma DBA Tacoma Power	U.S.	17	17	-	-	18	18	-	-	(1)	(1)									0	0				0	0
2011	WECC		City of Tacoma DBA Tacoma Power	U.S.	247,824	247,824	-	-	260,231	260,231	-	-	(20,729)	(20,729)									5,154	5,154				3,167	3,167
2011	WECC		City of Troy	U.S.	894	894	-	-	939	939	-	-	(75)	(75)									19	19				11	11
2011	WECC		City of Williams	U.S.	1,956	1,956	-	-	2,054	2,054	-	-	(164)	(164)									41	41				25	25
2011	WECC		Clark County Water Resources	U.S.	297	297	-	-	312	312	-	-	(25)	(25)									6	6				4	4
2011	WECC		Clark Public Utilities	U.S.	220,284	220,284	-	-	231,313	231,313	-	-	(18,426)	(18,426)									4,581	4,581				2,815	2,815
2011	WECC		Clatskanie PUD	U.S.	38,813	38,813	-	-	40,757	40,757	-	-	(3,247)	(3,247)									807	807				496	496
2011	WECC		Clearwater Cooperative, Inc	U.S.	8,112	8,112	-	-	8,518	8,518	-	-	(679)	(679)									169	169				104	104
2011	WECC		Clearwater Cooperative, Inc	U.S.	1,956	1,956	-	-	2,054	2,054	-	-	(164)	(164)									41	41				25	25
2011	WECC		Colorado River Agency-Bureau of Indian Affairs	U.S.	717	717	-	-	752	752	-	-	(60)	(60)									15	15				9	9
2011	WECC		Colorado River Commission of Nevada	U.S.	39,117	39,117	-	-	41,075	41,075	-	-	(3,272)	(3,272)									814	814				500	500
2011	WECC		Colorado Springs Utilities	U.S.	3,985	3,985	-	-	4,185	4,185	-	-	(333)	(333)									83	83				51	51
2011	WECC		Colorado Springs Utilities	U.S.	974	974	-	-	1,022	1,022	-	-	(81)	(81)									20	20				12	12
2011	WECC		Columbia Basin Electric Cooperative, Inc.	U.S.	5,208	5,208	-	-	5,469	5,469	-	-	(436)	(436)									108	108				67	67
2011	WECC		Columbia Falls Aluminum Company	U.S.	208	208	-	-	219	219	-	-	(17)	(17)									4	4				3	3
2011	WECC		Columbia Power Cooperative Association	U.S.	1,041	1,041	-	-	1,094	1,094	-	-	(87)	(87)									22	22				13	13
2011	WECC		Columbia River PUD	U.S.	8,316	8,316	-	-	8,732	8,732	-	-	(696)	(696)									173	173				106	106
2011	WECC		Columbia River PUD	U.S.	15,679	15,679	-	-	16,464	16,464	-	-	(1,312)	(1,312)									326	326				200	200
2011	WECC		Columbia Rural Electric Association (REA)	U.S.	14,966	14,966	-	-	15,716	15,716	-	-	(1,252)	(1,252)									311	311				191	191
2011	WECC		Consolidated Irrigation District No. 19	U.S.	275	275	-	-	288	288	-	-	(23)	(23)									6	6				4	4
2011	WECC		Constellation New Energy, Inc.	U.S.	3,576	3,576	-	-	3,755	3,755	-	-	(299)	(299)									74	74				46	46
2011	WECC		Consumers Power, Inc.	U.S.	20,771	20,771	-	-	21,811	21,811	-	-	(1,737)	(1,737)									423	423				265	265
2011	WECC		Coos-Curry Electric Cooperative, Inc	U.S.	17,491	17,491	-	-	18,367	18,367	-	-	(1,463)	(1,463)									364	364				224	224
2011	WECC		Deseret Generation & Transmission Cooperative	U.S.	223,790	223,790	-	-	234,994	234,994	-	-	(18,719)	(18,719)									4,654	4,654				2,860	2,860
2011	WECC		Deseret Generation & Transmission Cooperative	U.S.	4,248	4,248	-	-	4,461	4,461	-	-	(355)	(355)									88	88				54	54
2011	WECC		Douglas Electric Cooperative, Inc.	U.S.	4,700	4,700	-	-	4,935	4,935	-	-	(393)	(393)									98	98				60	60
2011	WECC		Douglas Palisades	U.S.	876	876	-	-	920	920	-	-	(73)	(73)									18	18				11	11
2011	WECC		El Paso Electric Company	U.S.	407,394	407,394	-	-	427,791	427,791	-	-	(34,077)	(34,077)									8,473	8,473				5,207	5,207
2011	WECC		Electrical District #2	U.S.	8,919	8,919	-	-	9,365	9,365	-	-	(746)	(746)									185	185				114	114
2011	WECC		Electrical District #2 - Coolidge Generating Station	U.S.	443	443	-	-	465	465	-	-	(87)	(87)									9	9				6	6
2011	WECC		Electrical Districts 1 & 3	U.S.	32,660	32,660	-	-	34,296	34,296</																			

2011 NEL Calculations and Allocations to Load Serving Entities (or Designee) for the 2013 NERC and RE Assessments

Data Year	Regional Entity	ID	Entity	Country	Total Regional Entity Assessments (Including WRAB Assessments)				Regional Entity NEL Assessments				Penalty Sanctions - US Only		NPCC 40% CORC excluding US Only Staff			NPCC 60% CORC Program			WECC Compliance Assessments (ex.AESO)				WRAB Assessments			
					Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Total	US Total	Canada Total	Total	US Total	Canada Total	Total	US Total	Canada Total	Mexico Total	Total	US Total	Canada Total	Mexico Total
2011	WECC		Municipal Energy Agency of Nebraska	U.S.	1,390	1,390	-	-	1,460	1,460	-	-	(116)	(116)							29	29					18	18
2011	WECC		Navajo Tribal Utility Authority	U.S.	2,187	2,187	-	-	2,297	2,297	-	-	(183)	(183)							45	45					28	28
2011	WECC		Navajo Tribal Utility Authority	U.S.	15,304	15,304	-	-	16,070	16,070	-	-	(1,280)	(1,280)							318	318					196	196
2011	WECC		Navapah Electric Cooperative, Inc.	U.S.	21,327	21,327	-	-	22,395	22,395	-	-	(1,784)	(1,784)							444	444					273	273
2011	WECC		Nebraska Public Power Marketing	U.S.	27,136	27,136	-	-	28,495	28,495	-	-	(2,270)	(2,270)							564	564					347	347
2011	WECC		Nespelem Valley Electric Cooperative, Inc.	U.S.	2,467	2,467	-	-	2,591	2,591	-	-	(206)	(206)							51	51					32	32
2011	WECC		Nevada Power Company dba NV Energy	U.S.	1,056,750	1,056,750	-	-	1,109,657	1,109,657	-	-	(88,392)	(88,392)							21,978	21,978					13,506	13,506
2011	WECC		Noble Americas Energy Solutions, LLC	U.S.	46,501	46,501	-	-	48,829	48,829	-	-	(3,890)	(3,890)							967	967					594	594
2011	WECC		Northern Lights, Inc.	U.S.	1,772	1,772	-	-	1,860	1,860	-	-	(148)	(148)							37	37					23	23
2011	WECC		Northern Lights, Inc.	U.S.	18,864	18,864	-	-	15,608	15,608	-	-	(1,243)	(1,243)							309	309					190	190
2011	WECC		Northern Western County PUD	U.S.	29,948	29,948	-	-	29,347	29,347	-	-	(2,338)	(2,338)							581	581					357	357
2011	WECC		NorthWestern Corp. dba NorthWestern Energy, LLC	U.S.	439,528	439,528	-	-	461,534	461,534	-	-	(36,765)	(36,765)							9,141	9,141					5,618	5,618
2011	WECC		NorthWestern Corp. dba NorthWestern Energy, LLC	U.S.	14,915	14,915	-	-	15,661	15,661	-	-	(1,248)	(1,248)							310	310					191	191
2011	WECC		Ohop Mutual Light Company	U.S.	4,337	4,337	-	-	4,555	4,555	-	-	(363)	(363)							90	90					55	55
2011	WECC		Orcas Power and Light Cooperative Operations Office	U.S.	10,701	10,701	-	-	11,237	11,237	-	-	(895)	(895)							223	223					137	137
2011	WECC		Oregon Trail Electric Consumers Cooperative, Inc.	U.S.	9,512	9,512	-	-	9,988	9,988	-	-	(796)	(796)							198	198					122	122
2011	WECC		Oregon Trail Electric Consumers Cooperative, Inc.	U.S.	16,308	16,308	-	-	17,125	17,125	-	-	(1,364)	(1,364)							339	339					208	208
2011	WECC		Overtown Power District No. 5	U.S.	18,499	18,499	-	-	19,425	19,425	-	-	(1,547)	(1,547)							385	385					236	236
2011	WECC		PacificCorp	U.S.	2,834	2,834	-	-	2,976	2,976	-	-	(237)	(237)							59	59					36	36
2011	WECC		PacificCorp	U.S.	102	102	-	-	107	107	-	-	(9)	(9)							2	2					1	1
2011	WECC		PacificCorp	U.S.	2,337,157	2,337,157	-	-	2,454,170	2,454,170	-	-	(195,493)	(195,493)							48,608	48,608					29,871	29,871
2011	WECC		PacificCorp	U.S.	88	88	-	-	92	92	-	-	(7)	(7)							2	2					1	1
2011	WECC		PacificCorp	U.S.	185	185	-	-	195	195	-	-	(16)	(16)							4	4					2	2
2011	WECC		PacificCorp West (PACW)	U.S.	1,019,863	1,019,863	-	-	1,070,924	1,070,924	-	-	(85,307)	(85,307)							21,211	21,211					13,035	13,035
2011	WECC		Page Electric Utility	U.S.	729	729	-	-	765	765	-	-	(61)	(61)							15	15					9	9
2011	WECC		Parkland Light and Water Company	U.S.	6,035	6,035	-	-	6,337	6,337	-	-	(505)	(505)							126	126					77	77
2011	WECC		Pend Oreille County PUD No. 1	U.S.	48,780	48,780	-	-	51,222	51,222	-	-	(4,080)	(4,080)							1,015	1,015					623	623
2011	WECC		Pend Oreille County PUD No. 1	U.S.	30,287	30,287	-	-	31,804	31,804	-	-	(1,533)	(1,533)							630	630					387	387
2011	WECC		Platte River Power Authority	U.S.	158,736	158,736	-	-	166,683	166,683	-	-	(13,278)	(13,278)							3,301	3,301					2,029	2,029
2011	WECC		Port of Seattle - Seattle-Tacoma International Airpo	U.S.	7,079	7,079	-	-	7,434	7,434	-	-	(592)	(592)							147	147					90	90
2011	WECC		Port Townsend Paper Corporation	U.S.	9,885	9,885	-	-	10,380	10,380	-	-	(827)	(827)							206	206					126	126
2011	WECC		Portland General Electric Company	U.S.	2,323	2,323	-	-	2,440	2,440	-	-	(194)	(194)							48	48					30	30
2011	WECC		Portland General Electric Company	U.S.	931,037	931,037	-	-	977,651	977,651	-	-	(77,877)	(77,877)							19,364	19,364					11,900	11,900
2011	WECC		Public Service Company of Colorado (Xcel)	U.S.	1,538,497	1,538,497	-	-	1,615,525	1,615,525	-	-	(128,688)	(128,688)							31,997	31,997					19,664	19,664
2011	WECC		Public Service Company of Colorado (Xcel)	U.S.	8,403	8,403	-	-	8,824	8,824	-	-	(703)	(703)							175	175					107	107
2011	WECC		Public Service Company of New Mexico	U.S.	53,866	53,866	-	-	55,845	55,845	-	-	(4,488)	(4,488)							11,602	11,602					6,798	6,798
2011	WECC		Public Utility District No. 1 of Chelan County	U.S.	184,719	184,719	-	-	193,967	193,967	-	-	(15,451)	(15,451)							3,842	3,842					2,361	2,361
2011	WECC		PUD No. 1 of Asotin County	U.S.	219	219	-	-	230	230	-	-	(18)	(18)							5	5					3	3
2011	WECC		PUD No. 1 of Asotin County	U.S.	15	15	-	-	16	16	-	-	(1)	(1)							0	0					0	0
2011	WECC		PUD No. 1 of Benton County	U.S.	83,132	83,132	-	-	87,294	87,294	-	-	(6,954)	(6,954)							1,729	1,729					1,063	1,063
2011	WECC		PUD No. 1 of Clallam County	U.S.	33,959	33,959	-	-	35,659	35,659	-	-	(2,841)	(2,841)							706	706					434	434
2011	WECC		PUD No. 1 of Cowlitz County	U.S.	249,784	249,784	-	-	262,290	262,290	-	-	(20,893)	(20,893)							5,195	5,195					3,192	3,192
2011	WECC		PUD No. 1 of Cowlitz County	U.S.	234	234	-	-	246	246	-	-	(20)	(20)							5	5					3	3
2011	WECC		PUD No. 1 of Douglas County	U.S.	441	441	-	-	463	463	-	-	(37)	(37)							9	9					6	6
2011	WECC		PUD No. 1 of Douglas County	U.S.	70,102	70,102	-	-	73,612	73,612	-	-	(5,864)	(5,864)							1,458	1,458					896	896
2011	WECC		PUD No. 1 of Ferry County	U.S.	5,261	5,261	-	-	5,524	5,524	-	-	(440)	(440)							109	109					67	67
2011	WECC		PUD No. 1 of Franklin County	U.S.	50,066	50,066	-	-	52,573	52,573	-	-	(4,188)	(4,188)							1,041	1,041					640	640
2011	WECC		PUD No. 1 of Grays Harbor	U.S.	57,846	57,846	-	-	60,742	60,742	-	-	(4,839)	(4,839)							1,203	1,203					739	739
2011	WECC		PUD No. 1 of Kittitas County	U.S.	3,440	3,440	-	-	3,612	3,612	-	-	(288)	(288)							72	72					44	44
2011	WECC		PUD No. 1 of Kittitas County	U.S.	385	385	-	-	404	404	-	-	(32)	(32)							8	8					5	5
2011	WECC		PUD No. 1 of Kittitas County	U.S.	830	830	-	-	871	871	-	-	(69)	(69)							17	17					11	11
2011	WECC		PUD No. 1 of Kittitas County	U.S.	12,906	12,906	-	-	13,553	13,553	-	-	(1,080)	(1,080)							268	268					165	165
2011	WECC		PUD No. 1 of Lewis County	U.S.	47,877	47,877	-	-	50,274	50,274	-	-	(6,005)	(6,005)							966	966					612	612
2011	WECC		PUD No. 1 of Mason County	U.S.	3,950	3,950	-	-	4,148	4,148	-	-	(330)	(330)							82	82					50	50
2011	WECC		PUD No. 1 of Skamania County	U.S.	6,679	6,679	-	-	7,014	7,014	-	-	(559)	(559)							139	139					85	85
2011	WECC		PUD No. 1 of Snohomish County	U.S.	351,384	351,384	-	-	368,976	368,976	-	-	(29,392)	(29,392)							7,308	7,308					4,491	4,491
2011	WECC		PUD No. 1 of Wahkiakum County	U.S.	2,224	2,224	-	-	2,335	2,335	-	-	(186)	(186)							46	46					28	28
2011	WECC		PUD No. 1 of Whatcom County	U.S.	10,742	10,742	-	-	11,279	11,279	-	-	(898)	(898)							223	223					137	137
2011	WECC		PUD No. 1 of Whatcom County	U.S.	534	534	-	-	561	561	-	-	(45)	(45)							11	11					7	7
2011	WECC		PUD No. 2 of Grant County	U.S.	4,186	4,186	-	-	4,395	4,395	-	-	(350)	(350)							87	87					53	53
2011	WECC		PUD No. 2 of Grant County	U.S.	2,390	2,390	-	-	2,510	2,510	-	-	(200)															

DOCKET NO. RR12-__-000

**NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION**

2013 BUSINESS PLAN AND BUDGET FILING

ATTACHMENT 3

MIDWEST RELIABILITY ORGANIZATION

PROPOSED 2013 BUSINESS PLAN AND BUDGET



MIDWEST RELIABILITY ORGANIZATION

2013 Business Plan and Budget

**Approved by:
MRO Board of Directors**

**Date
June 28, 2012**



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Summary of Financials and Resources

	Total Resources (in whole dollars)			
	2013 Budget	U.S.	Canada	Mexico
Statutory FTEs	37.75			
Non-statutory FTEs				
Total FTEs	37.75			
Statutory Expenses	\$ 9,199,353			
Non-Statutory Expenses	\$ -			
Total Expenses	\$ 9,199,353			
Statutory Inc(Dec) in Fixed Assets	\$ 84,186			
Non-Statutory Inc(Dec) in Fixed Assets	\$ -			
Total Inc(Dec) in Fixed Assets	\$ 84,186			
Statutory Working Capital Requirement	\$ (170,612)			
Non-Statutory Working Capital Requirement				
Total Working Capital Requirement	\$ (170,612)			
Total Statutory Funding Requirement	\$ 9,112,927			
Total Non-Statutory Funding Requirement	\$ -			
Total Funding Requirement	\$ 9,112,927			
Statutory Funding Assessments	\$ 9,112,927			
Non-Statutory Fees				
NEL	282,953,703	238,655,688	44,298,015	-
NEL%	100.00%	84.34%	15.66%	0.00%

Midwest Reliability Organization (“MRO”) 2013 Business Plan and Budget has been developed by MRO staff. The plan and budget are subject to MRO Board of Directors (“Board”) approval and stakeholder review.

1. Organizational Overview

MRO is a cross border Regional Entity (or “Region”) in North America operating under authority from regulators in the United States through a delegation agreement with the North American Electric Reliability Corporation (“NERC”) and through other arrangements in Canada. In the United States, MRO operates under the authority found in Section 215 of the Federal Power Act, through the Federal Energy Regulatory Commission (“FERC” or “Commission”) and through other arrangements in Manitoba and Saskatchewan. The primary focus of MRO is assessing compliance with Reliability Standards on entities that

Introduction

own, operate or use the Bulk Electric System¹ (“BES”), performing assessments of the BES, and technical analysis of matters impacting the reliability of the BES in the north central part of North America. For more information on MRO, please refer to www.midwestreliability.org.



MRO is a non-profit corporation licensed and registered to conduct business and operate in all the states and two Canadian provinces within its region. The MRO Region is comprised of municipal utilities, cooperatives, investor owned utilities, a federal power marketing agency, Canadian Crown Corporations, large and small end-use load organizations, transmission system operators, regional planning authorities, and independent power producers.² The MRO Region spans eight states and two Canadian provinces covering roughly one million square miles.

MRO is independent of bulk electric owners, users, and operators of the BES, is not an operator, owner, or user of the BES, and has no shared employees with a third or related party. MRO performs only those responsibilities under Section 215 of the Federal Power Act and similar functions through arrangements with Saskatchewan and Manitoba.

In Manitoba, the Manitoba Reliability Regulation became effective April 1, 2012, authorizing MRO to conduct compliance monitoring and enforcement for all entities in Manitoba that meet the registration criteria. MRO expects less than ten new entities within Manitoba will meet the NERC Registration Criteria. These entities will become subject to compliance monitoring and mandatory enforcement of Reliability Standards on September 28, 2012.

The committees, subcommittees, working groups and task forces of MRO provide recommendations, advice, and counsel to the Board. The Board has the decision-making authority and is balanced in its representation. The Board is comprised of the following sectors:

¹ See the Compliance Registry Listing by Regional Entity posted on NERC’s website at <http://www.nerc.com/page.php?cid=3|25>

² The MRO board and its members have approved a change to its bylaws which would, in part, (1) eliminate the large and small end-use sectors; (2) add two independent directors; and (3) add a non-voting adjunct class of members. The proposed changes were approved by the NERC Board of Trustees in May 2012 and approved by the Federal Energy Regulatory Commission on June 25, 2012.

- Canadian Utility (2)
- Cooperative (2)
- Federal Power Marketing Agency (1)
- Generator and/or Power Marketer (2)
- Investor Owned Utility – Large (3)
- Investor Owned Utility – Small (2)
- Large End-Use Electricity Customer (1)
- Municipal Utility (2)
- Small End-Use Electricity Customer (1)
- Transmission System Operator (3)

In 2012, the members of MRO approved revised bylaws to include independent Board members. MRO plans to seat the independent board members after the bylaws are approved by applicable regulators.

Regulators are eligible to be members in MRO and share the same rights as other members but have no vote. All Board meetings are open, but the Board reserves the right to call a meeting into Executive Session.

2. Governance

Membership in MRO, which is voluntary and at no cost, affords organizations the opportunity to participate in the technical activities and governance of the organization. MRO has approximately fifty members.

For 2012, the governance structure of MRO is currently a balanced stakeholder board³ whereby no two sectors can control a vote. In 2012, the members of MRO approved revised bylaws to include independent Board members. MRO plans to seat the independent board members after the bylaws are approved by applicable regulators. The change in governance is budgeted beginning in 2013.

The current and proposed governance structure are permitted under the Energy Policy Act of 2005 for Regional Entities operating under delegated authority from the Electric Reliability Organization. The Board has four committees:

- Dispute Resolution Committee
- Finance and Audit Committee (FAC)
- Governance and Personnel Committee (GPC)
- Hearing Body

The Board's primary role is to assure the organization meets its requirements under the bylaws and performs its responsibilities with due care and in an efficient manner. The Board makes no determinations on compliance or enforcement matters. The Board has adopted procedures to assure they carry out their responsibilities free of conflicts. The Hearing Body

³ MRO has proposed a hybrid board. See footnote 2.

of the Board fulfills the obligations in the conduct of hearings, a mandated function under the Hearing Procedures found in the Compliance Monitoring and Enforcement Program (“CMEP”).

In addition, MRO has four standing committees:

- Compliance Committee
- Operating Committee
- Planning Committee
- Standards Committee

The charters for these standing committees are published on MRO’s website and the processes for all organizational groups are defined in Policy and Procedure 3 (Establishment, Responsibilities, and Procedures of Organizational Groups).⁴

3. Statutory Functional Scope

The primary purposes of MRO are:

1. Determine compliance with Reliability Standards, including enforcement determinations in a non-discriminatory manner consistent with the Rules.
2. Perform seasonal, long-term, and other assessments of reliability.
3. Provide independent technical analysis of systems events and work with industry on recommendations and lessons learned.
4. Develop, propose, and/or adopt Reliability Standards or variances to Reliability Standards.
5. Other services consistent with its reliability charter, delegation agreement and the Rules.

MRO provides a transparent, effective, and efficient reliability organization across a broad geographic region with open meetings and an inclusive standard setting process:

1. MRO is an effective Regional Entity that has a long tradition of managing within and across complex, multiple seams including an interconnection seam, structured markets to bilateral market seams, and an international border.
2. MRO creates a common forum for the region without barriers to participation.
3. The MRO Region has a tradition of working successfully on reliability matters despite the complexities in seams, diverse constituencies, and jurisdictions. Approximately half of the load in MRO is public power, including Canada. MRO is a vital link to maintain and expand existing “reliability” relationships amongst regulators, bulk electric users, owners, and operators.
4. Because of the seams, unique power system technical configurations, such as very long distances between load and generator, stability-limited transmission, the large percentage of hydro generation, and the diversity of its constituency, the region must

⁴ See Policy and Procedure 3 (Establishment, Responsibilities, and Procedures of Organizational Groups) on MRO’s website at http://www.midwestreliability.org/01_about_mro/overview/policies_procedures/PP3_%20Organizational%20Groups.pdf

have the ability and means to represent its own regional reliability interests for the benefit of the users, owner, and operators of the bulk electric system and the public it serves as a Cross Border Regional Entity (CBRE) under the final reliability rule and consistent with the Bilateral Principles.

The 2013 Business Plan and Budget fulfill MRO's commitments related to the delegated functions, consistent with FERC and Canadian authorities:

- Implementation of compliance and enforcement programs to those subject to Reliability Standards.
- Non-discriminatory, consistent enforcement process to those subject to Reliability Standards.
- Adoption of Reliability Standards to ensure enforceability. Canadian enforceability has been sought through agreements with Saskatchewan and Manitoba.
- Ability to propose standards to benefit the reliability of the MRO Region, using an open, technically valid process.
- Provide education and resources for operators, users, and owners of the BES.
- Assess and report on regional BES reliability and adequacy.
- Analyze and report on regional BES system events.

4. 2013 Account Methodology

2013 Personnel Expenses

Budgeted FTEs per program are based on the projected time spent per employee per program. MRO staff tracks their time by program on an hourly basis in attempt to accurately reflect where actual time is spent to correctly align costs. A very limited number of MRO staff works in one program only. MRO believes that value is added by budgeting and tracking actual resources to correctly substantiate that MRO is putting their resources and time in the identified high priority areas.

In 2012 and 2013, the budgeted benefits are based on an average cost per employee. For the last two years (2011 and projected 2012), MRO's actuals have come in lower than budgeted amounts for Employee Benefits. MRO believes that this trend will continue in 2013 in retrospect to the 2012 Budget. MRO is proposing a modest increase in 2013 using the 2012 actuals as the baseline.

In developing the 2012 budgeted Personnel Expenses, MRO made an error in assigning costs to the Salaries, Payroll Taxes, Benefits and Retirement sub-categories. The total Personnel Expenses in the budget were the intended amount, but the individual components were incorrectly stated in the budget. MRO subsequently discovered this error and has corrected the source of it going forward. However, this error results in large variances between the 2012 Budget and 2012 Projection and the 2012 Budget and 2013 Budget with respect to the 4 line-item components of Personnel Expenses.

See table below.

	Approved 2012 Budget	Pct	Revised Allocation	Pct	Difference
Salaries	4,513,031	77.8%	4,406,281	76.0%	(106,750)
Payroll Tax	300,540	5.2%	282,448	4.9%	(18,092)
Benefits	412,899	7.1%	335,991	5.8%	(76,908)
Retirement	574,474	9.9%	776,224	13.4%	201,750
Total	5,800,944	100.0%	5,800,944	100.0%	

2013 Travel

The 2011 Budget assumed 100% participation in our member reimbursement which was not realized. MRO did not assume 100% participation in the 2012 and 2013 Budget for member reimbursement. However, in 2013 we are anticipating higher airline costs so we increased the 2013 budget by 10% for all travel for staff and member reimbursement.

5. 2013 Key Assumptions

The NERC and Regional Entity business plans and budgets reflect a set of common assumptions developed jointly by NERC and the Regional Entities as part of the annual business plan and budget process located in Exhibit A of NERC's 2013 Business Plan and Budget.

6. 2013 Goals and Key Deliverables

The vision of MRO is to oversee a reliable regional bulk power system in North America. MRO's purpose is to strive to assure each bulk electric system owner, operator, and planner within the region is a highly effective reliable organization. MRO will apply an expert-based approach, leveraging industry experts to address risks and improve reliability and security for the overall benefit of regional reliability. Through stakeholder processes, MRO will provide clarity on expectations and requirements, look to embed risk controls for assurance across the networked bulk power system, and demonstrate results that improve reliability. For more information on MRO's Vision, Purpose, and Principles, please refer to MRO's website at <http://www.midwestreliability.org/>.

MRO's business planning is driven by the annual strategic initiatives, which are used in conjunction with the organizational vision, purpose, and principles:

1. Work to improve quality and speed of Reliability Standards development.
 - a. Focus on risk, significance, and clarity on the technical application of standards
2. Work with stakeholders and NERC to:
 - a. Identify and address reliability risks and communicate lessons learned and trends in a timely manner,
 - b. Develop guidance on standards and model controls/procedures to assure compliance,
 - c. Establish key indicators of reliable and secure performance.
3. Establish internal metrics for effectiveness and efficiency of key program areas.
4. Closer coordination within the Eastern Interconnection.
5. Communicate with state and provincial regulators.

Long-Term Business Planning

NERC and the Regional Entities are actively working together to improve the overall ERO business planning and budgeting process, including long-term resource and financial planning. The 2013 Business Plan and Budget process included numerous face-to-face meetings, conference calls and exchanges of documentation among senior management and staff of NERC and Regional Entities regarding budget assumptions, resource requirements, and opportunities to improve operational efficiency and effectiveness, including factors affecting resource needs beyond the 2013 planning horizon. As an important first step in the development of a long-term business plan and budgeting process, the Common Business Plan and Budget Assumptions attached as Exhibit A in the NERC 2013 Business Plan and Budget incorporate assumptions affecting resource demands through the 2015 planning horizon. NERC and the Regional Entities continue to work together to develop, strengthen and improve an integrated long term ERO business plan and budget that leverages and builds on the combined strengths and resources of NERC and the Regional Entities to improve the overall effectiveness and efficiency of ERO operations.

7. 2013 Overview of Cost Impacts

MRO proposes to increase its operating budget from \$9.06 million to \$9.30 million, an increase of \$226,309. Due to an expected reduction in the collection of applicable penalties and change in working capital, funding assessments will increase by \$749,898 or 8.98%.

Operational Programs

Funding Requirements — Explanation of Increase (Decrease)

Standards

For 2013, MRO will maintain flat staffing levels in the Standards area. MRO will continue to focus on continent-wide standards and leveraging experts from the industry to assure proper technical application of existing standards.

Compliance

MRO has three independent programs within the NERC defined compliance monitoring and enforcement program:

Compliance

The mission of the compliance staff is to conduct audits, spot checks, and maintain accurate registrations. Budgeted costs for this program will decrease in 2013.

Risk Assessment and Mitigation

This program conducts risk assessment of any “findings” from compliance audit staff or from self-reports. This includes a validation of any “findings” of possible violations. Also, this program works with Registered Entities on comprehensive mitigation plans. Finally, this program handles investigations. MRO is budgeting an increase in costs for this program in 2013.

Enforcement

After a risk assessment is complete, and facts and circumstances confirmed, possible violations are turned over to enforcement for final disposition and resolution. Costs for this program are budgeted to remain flat in 2013.

Training and Education

MRO will provide training to Registered Entities through workshops, presentation opportunities at industry meetings and by providing lessons learned in MRO's newsletter and other publications. Through the MRO Standards Committee, Subject Matter Expert ("SME") teams have been established to provide training on best practices and model programs for compliance, operations, and CIP.

Reliability Assessment and Performance Analysis

In 2013, MRO staff and representatives from Registered Entities will continue to participate in Eastern Interconnection modeling efforts through the Eastern Interconnection Reliability Assessment Groups ("ERAG") and other stakeholder groups. MRO reimburses those individuals who represent MRO in the ERAG, and other stakeholders groups for approved travel expenses. In addition, MRO staff will continue to independently assess the work from registered entities in long-term and other assessments. MRO expects a slight decrease in the costs of this program in 2013.

Situation Awareness & Infrastructure Security Program

Situation Awareness

MRO will participate in the development of the next phase of the Situation Awareness effort to monitor the BES across North America. In addition, staff will monitor and respond to events and incidents to ensure timely reporting, effective communication of potential risks, and mitigation of the risks to the BES as a result of any events and incidents. MRO has emphasized the importance of Situation Awareness and the related Event Analysis process and sharing lessons learned with the industry.

Infrastructure Security Program

In recognition of the criticality of protection of cyber infrastructure and BES control systems, the 2013 Budget includes dollars for MRO representatives to participate in infrastructure security related activities and travel to attend security related meetings. Critical infrastructure compliance, training and education are budgeted in the applicable areas of the budget – these costs have increased year over year.

Administrative Programs

Technical Committees and Member Forums (Committees that meet for NERC business)

MRO staff and Registered Entity staff will continue to participate in NERC committees and working groups. By policy, MRO reimburses Registered Entities for approved regional representative travel expenses.

General and Administrative

The 2013 Budget includes a decrease in travel dollars reflecting a lowering trend of expense reimbursements for MRO Board of Directors. Travel relating to quarterly NERC Board of Trustees (NERC BOT) meetings is captured in the Technical Committees and Member Forums. The 2013 Budget reflects the lower trending in 2012, however, in the 2013 Budget we are anticipating higher airline costs so we increased the 2013 Budget by 10%.

The 2013 Budget includes an increase in professional services due to the costs for independent MRO board members.

Information Technology

In 2013, MRO continues to maintain security of its IT systems and information, along with addressing any recommendations from external and internal evaluations. MRO uses independent, third parties to provide periodic assessments of its infrastructure security. MRO subscribes to compliance and standards applications from a third party vendor; these applications are subject to independent, third party audits and reside on a secure platform.

Greater efficiencies are budgeted with this third party vendor as additional regions expand the common IT platform increasing scale and reducing costs by spreading costs across the increased number of participating regions.

In 2012 MRO projections and 2013 Budget, MRO has increased staff in this area. By using in-sourced “core” responsibilities, MRO is reducing third party consultant and contractor costs significantly.

Legal and Regulatory

For 2013, MRO overall costs will remain relatively flat. There was an additional staff of approximately .50 FTE added which is offset by anticipated reduction in professional services. Again, by using in-sourced “core” responsibilities MRO can reduce outside professional costs.

Accounting / Human Resources

Personnel Costs - Employee Paid Benefits

The 2013 Budget has an increase in the number of FTEs from 2.76 to 3.01. Part of the additional staff came from a part-time staff becoming full-time. MRO’s overall FTE staffing has increased from 20.00 in 2007 to 37.75 in 2013 Budget. This is the first increase in staff in HR/Finance from 2 to 3 FTEs. In addition, the budget includes an increase in Building, Rent and Facilities costs to reflect 12 months higher new facility lease costs in 2013 (MRO moved to new facilities in April 2012).

The 2012 Budget included some non-operating increases relating to the 2012 facility move that were one-time costs and therefore are not included in 2013 Budget.

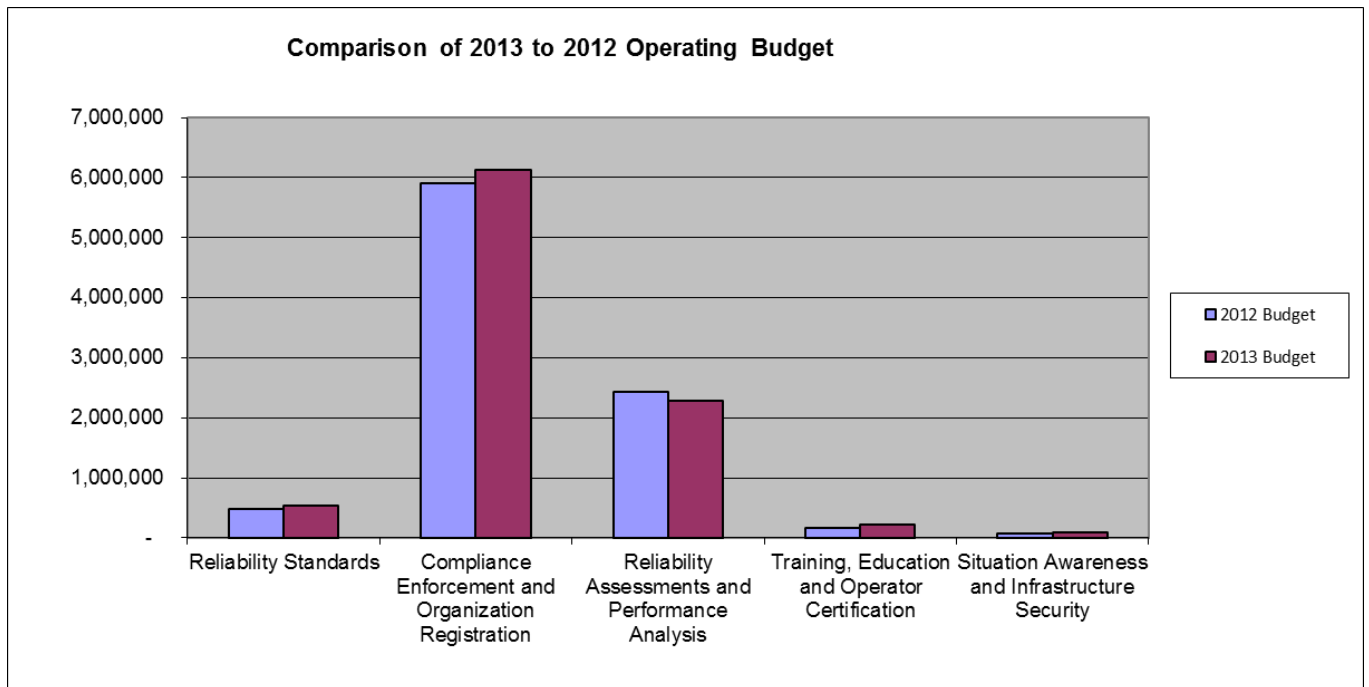
New Facility

The 2012 Budget included budgeted Leasehold Improvements for a new facility. MRO staff was given the authority to seek alternative facilities to address MRO’s growing need for additional space for the higher number of FTEs and provide more opportunities to host meetings. The 2013 Budget reflects 12 months of lower per meeting costs with the new facility due to elimination of meeting room and audio visual rentals as well as lower catering costs.

Other Non-Operating Expenses

The 2012 Budget included a one-time relocation cost relating to a budgeted facility move of \$77,484 and are not necessary in the 2013 Budget.

Program	2012 Budget	2013 Budget
Reliability Standards	477,617	543,602
Compliance Enforcement and Organization Registration	5,898,707	6,135,726
Reliability Assessments and Performance Analysis	2,434,989	2,277,446
Training, Education and Operator Certification	173,788	229,418
Situation Awareness and Infrastructure Security	72,131	97,348
TOTAL BUDGET	9,057,232	9,283,539



Introduction

Total FTE's by Program Area	Budget	Projection	Direct FTEs	Shared	Total FTEs	Change
	2012	2012	2013 Budget	FTEs ¹ 2013 Budget	2013 Budget	from 2012 Budget
STATUTORY						
Operational Programs						
Reliability Standards	1.59	1.51	1.51		1.51	(0.08)
Compliance and Organization Registration and Certific	19.16	17.17	18.99		18.99	(0.17)
Training and Education	0.18	0.27	0.27		0.27	0.09
Reliability Assessment and Performance Analysis	8.04	6.68	6.68		6.68	(1.36)
Situation Awareness and Infrastructure Security	0.18	0.29	0.30		0.30	0.12
Total FTEs Operational Programs	29.15	25.92	27.75	-	27.75	(1.40)
Administrative Programs						
Technical Committees and Member Forums	0.71	1.35	1.35		1.35	0.64
General & Administrative	1.53	1.32	1.32		1.32	(0.21)
Legal and Regulatory	0.73	1.22	1.22		1.22	0.49
Information Technology	2.12	3.01	3.10		3.10	0.98
Human Resources	-	-	-		-	-
Finance and Accounting	2.76	3.01	3.01		3.01	0.25
Total FTEs Administrative Programs	7.85	9.91	10.00	-	10.00	2.15
Total FTEs	37.00	35.83	37.75	-	37.75	0.75

¹A shared FTE is defined as an employee who performs both Statutory and Non-Statutory functions.

Introduction

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
STATUTORY					
	2012 Budget	2012 Projection	Variance 2012 Projection v 2012 Budget Over(Under)	2013 Budget	Variance 2013 Budget v 2012 Budget Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ 8,349,029	\$ 8,349,029	\$ -	\$ 9,098,927	\$ 749,898
Penalty Sanctions	418,499	418,499	-	14,000	(404,499)
Total NERC Funding	\$ 8,767,528	\$ 8,767,528	\$ -	\$ 9,112,927	\$ 345,399
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Total Funding (A)	\$ 8,767,528	\$ 8,767,528	\$ -	\$ 9,112,927	\$ 345,399
Expenses					
Personnel Expenses					
Salaries	\$ 4,513,033	\$ 4,406,281	\$ (106,752)	\$ 4,772,320	\$ 259,287
Payroll Taxes	300,538	282,448	(18,090)	312,394	11,856
Benefits	412,900	335,991	(76,909)	394,086	(18,814)
Retirement Costs	574,473	776,224	201,751	833,228	258,755
Total Personnel Expenses	\$ 5,800,944	\$ 5,800,944	\$ -	\$ 6,312,028	\$ 511,084
Meeting Expenses					
Meetings	\$ 134,254	\$ 132,454	\$ (1,800)	\$ 132,464	\$ (1,790)
Travel	578,440	592,970	14,530	630,765	52,325
Conference Calls	50,500	50,500	-	41,700	(8,800)
Total Meeting Expenses	\$ 763,194	\$ 775,924	\$ 12,730	\$ 804,929	\$ 41,735
Operating Expenses					
Consultants & Contracts	\$ 796,776	\$ 796,776	\$ -	\$ 573,100	\$ (223,676)
Office Rent	391,680	429,774	38,094	528,827	137,147
Office Costs	471,719	436,719	(35,000)	428,304	(43,415)
Professional Services	194,000	194,000	-	246,500	52,500
Miscellaneous	-	-	-	-	-
Depreciation	388,498	388,498	-	305,665	(82,833)
Total Operating Expenses	\$ 2,242,673	\$ 2,245,767	\$ 3,094	\$ 2,082,396	\$ (160,277)
Total Direct Expenses	\$ 8,806,811	\$ 8,822,635	\$ 15,824	\$ 9,199,353	\$ 392,542
Indirect Expenses	\$ -	\$ -	\$ -	\$ -	\$ (0)
Other Non-Operating Expenses	\$ 77,484	\$ 77,484	\$ -	\$ -	\$ (77,484)
Total Expenses (B)	\$ 8,884,295	\$ 8,900,119	\$ 15,824	\$ 9,199,353	\$ 315,058
Change in Assets	\$ (116,767)	\$ (132,591)	\$ (15,824)	\$ (86,426)	\$ 30,341
Fixed Assets					
Depreciation	\$ (388,498)	\$ (388,498)	\$ -	\$ (305,665)	\$ 82,833
Computer & Software CapEx	350,435	310,435	(40,000)	339,851	(10,584)
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	211,000	653,450	-	50,000	(161,000)
Allocation of Fixed Assets	\$ (2)	\$ (2)	\$ -	\$ -	\$ 2
Inc(Dec) in Fixed Assets (C)	172,935	575,385	(40,000)	84,186	(88,749)
TOTAL BUDGET (=B + C)	\$ 9,057,230	\$ 9,475,504	\$ (24,176)	\$ 9,283,539	\$ 226,309
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ (289,702)	\$ (707,976)	\$ 24,176	\$ (170,612)	\$ 119,090
FTEs	37.00	35.83	(1.91)	37.75	0.75



Section A – Statutory Programs

2013 Business Plan and Budget

Section A — 2013 Business Plan

1. Reliability Standards Program

Reliability Standards Program (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	1.59	1.51	(0.08)
Direct Expenses	\$ 291,042	\$ 340,889	\$ 49,847
Indirect Expenses	\$ 176,678	\$ 198,132	\$ 21,454
Other Non-Operating Expenses	\$ -	\$ -	\$ -
Inc(Dec) in Fixed Assets	\$ 9,896	\$ 4,581	\$ (5,315)
Total Funding Requirement	\$ 477,617	\$ 543,602	\$ 65,985

Program Scope and Functional Description

NERC uses stakeholder driven processes, consistent with the Rules, to develop and maintain Reliability Standards that apply to bulk electric system owners, operators, and users and that enable NERC and Regional Entities to measure the reliability performance of bulk electric system owners, operators, and users; and to hold them accountable for reliable operation of the bulk electric systems. The Reliability Standards must be technically sound, timely, just, reasonable, not unduly discriminatory or preferential, in the public interest, and consistent with other applicable requirements.

2013 Key Assumptions

The NERC and Regional Entity business plans and budgets reflect a set of common assumptions developed jointly by NERC and the Regional Entities as part of the annual business plan and budget process. The common assumptions for the Reliability Standards Program can be located in the Key Assumptions section of Exhibit A in NERC's 2013 Business Plan and Budget.

MRO utilizes a balanced stakeholder Standards Committee ("SC") to administer the regional standards program, to educate stakeholders about the application of Reliability Standards, and to provide regional input to NERC Standards development efforts and the SC is charged with the following responsibilities:

- Recommend to the MRO Board, regional representatives for NERC standards development and drafting related working groups and committees
- Where necessary, assure regional Reliability Standards are consistent with continent-wide Reliability Standards
- Process all requests for new or modifications to Reliability Standards
- Maintain MRO Reliability Standards process documentation
- Present new or modifications to regional Reliability Standards for adoption by the MRO Board upon recommendation from the SC

-
- Assign the development of a regional Reliability Standard to a drafting team
 - Promote coordination of MRO’s efforts with other Regional Entities and NERC, including periodic review of Reliability Standards and their applicability to those subject to the Reliability Standards
 - Provide non-binding assistance to stakeholders in understanding the application of continent-wide Reliability Standards and the types of evidence needed to demonstrate compliance through examples
 - Identify pools of subject-matter experts (“SMEs”) in the industry to assist in the development of application guides
 - Oversee the development of application guides for Reliability Standards
 - Review frequently occurring compliance violations to determine if there are any additional application guidelines that are needed or additional changes to standards or request interpretations
 - Provide education and training on effectively demonstrating compliance to stakeholders through webinars, emails, conference calls, presentations, or workshops
 - Provide recommendations to the NERC standing committees or other working groups as required
 - Provide comments and voting positions on NERC proposed standards interpretations and compliance application notice from MRO stakeholders

In supporting the work of the SC, MRO staff monitors the NERC Standards development efforts and facilitates the efforts of the SC, drafting teams and commenting groups to provide input in a coordinated manner. Staff also ensures the regional processes are followed for regional standards development.

The SC is committed to developing and delivering training to industry stakeholders on meeting the obligations and requirements of existing, new, or emerging Reliability Standards. In support of the SC’s commitment, MRO staff provides input to the SME teams in developing their training tools and reviews the Application Guidance documents and presentations. In addition, MRO staff helps manage all SME team projects and provides technical support. MRO staff appreciates the SME teams sharing their technical expertise and knowledge to improve power system reliability for all.

MRO staff and stakeholders provide technical advice and comment to NERC when developing Reliability Standards applicable across North America and the Eastern Interconnection. MRO staff and Registered Entities participate in NERC and MRO standards drafting teams, hold meetings and conferences to discuss standards, and actively work with NERC on their standards development plan.

For regional standards development, MRO uses a web-based standard voting system called Reliability Standards Voting Process (“RSVP”), which maintains the records of the comments and votes of each proposed standard. This system permits easy administration and convenience for those who participate in the standards process through the MRO Registered Ballot Body. There is no cost for participation.

NERC's Four Year Standards Development Plan included in NERC's 2013 Business Plan and Budget as Exhibit A supports the significant effort required by MRO to participate in standards development.

2013 Goals and Key Deliverables

- Provide comments and support to other NERC and MRO SC activities.
- Work with NERC to improve interpretation of existing Reliability Standards.
- Work with NERC to improve the process timeliness of Reliability Standards development.
- Comment on all NERC Standards Authorization Requests (SAR) and draft standards.
- Communicate with stakeholders and vote on all NERC Standards.
- Support and inform SC and Board of standards-related activities.
- Participate on various NERC groups and committees.
- MRO SME teams and staff train and educate Registered Entities on the application of standards by participating in MRO workshops (Costs are captured in Training and Education.)

Funding Sources and Requirements — Explanation of Increase (Decrease)

For 2013, MRO will maintain flat staffing levels in the Standards area. Since Standards are primarily an industry activity, MRO has leveraged staff from Registered Entities in drafting teams and in other areas to gain more subject matter expertise applied to the standards process. While MRO reimburses travel expenses for approved representatives, there are staff cost savings.

Funding Sources (Other than ERO Assessments)

- Penalty Sanctions – Total penalty monies received and the allocation method used to allocate funds to this Program as an offset to assessments are disclosed in MRO's Supplemental Financial Information section, Table B-2, page 63.

Personnel Expenses

- MRO continues to facilitate additional technical resources from the industry in drafting teams and in other areas to augment staff involvement, which has resulted in a stabilized number of FTEs. MRO reimburses travel expenses for stakeholder participation.
- Please refer to Section 4 Account Methodology, Personnel Expenses which explains MRO's 2012 personnel cost fluctuations most notable in the retirement costs.
- The 2013 budgeted Salaries is higher than 2012 budget, with no increase in FTEs due to the position requiring more senior staff.

Meeting Expenses

- 2013 Meeting expenses will be reduced from the 2012 Budget. The reduction is a reflection of lower meeting costs by using the new facility – for details please refer to the 2013 Overview of Cost Impacts section under Accounting, page 13. The 2013 member travel reimbursement will be reduced to reflect the 2011 trend of subject matter experts avoiding travel by using frequent conference calls.

Operating Expenses

- 2013 Consultant and Contract costs will remain at the same level as the 2012 Budget.

-
- 2013 Office costs will increase in departmental training for required hours for maintaining certifications.

Indirect Expenses

- Expenses related to indirect programs have been allocated proportionately based on FTE count to the direct programs. There is an increase in the indirect expenses for 2013 as a result of higher FTEs in the Administrative Services, as well as an increase in the new facility lease costs. The facility cost increase is offset by a reduction in costs for meetings.

Other Non-Operating Expenses

- N/A

Fixed Asset Additions

- 2013 Fixed assets related to indirect programs have been allocated proportionately based on FTE to the direct programs.

Reliability Standards Program

Funding sources and related expenses for the Reliability Standards section of the 2013 business plan are shown in the table below.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
RELIABILITY STANDARDS					
	2012 Budget	2012 Projection	Variance 2012 Projection v 2012 Budget Over(Under)	2013 Budget	Variance 2013 Budget v 2012 Budget Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ 454,789	\$ 454,789	\$ -	\$ 542,840	\$ 88,051
Penalty Sanctions	22,827	22,827		762	(22,065)
Total NERC Funding	\$ 477,616	\$ 477,616	\$ -	\$ 543,602	\$ 65,986
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Total Funding (A)	\$ 477,616	\$ 477,616	\$ -	\$ 543,602	\$ 65,986
Expenses					
Personnel Expenses					
Salaries	\$ 153,497	\$ 205,888	\$ 52,391	\$ 210,558	\$ 57,061
Payroll Taxes	12,655	11,716	(939)	12,362	(293)
Benefits	18,238	13,700	(4,538)	15,154	(3,084)
Retirement Costs	20,652	32,340	11,688	32,835	12,183
Total Personnel Expenses	\$ 205,042	\$ 263,644	\$ 58,602	\$ 270,909	\$ 65,867
Meeting Expenses					
Meetings	\$ 13,000	\$ 13,000	\$ -	\$ 7,500	\$ (5,500)
Travel	42,000	42,000	-	28,900	(13,100)
Conference Calls	18,000	18,000	-	15,000	(3,000)
Total Meeting Expenses	\$ 73,000	\$ 73,000	\$ -	\$ 51,400	\$ (21,600)
Operating Expenses					
Consultants & Contracts	\$ 12,000	\$ 12,000	\$ -	\$ 12,000	\$ -
Office Rent	-	-	-	-	-
Office Costs	1,000	1,000	-	6,580	5,580
Professional Services	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Depreciation	-	-	-	-	-
Total Operating Expenses	\$ 13,000	\$ 13,000	\$ -	\$ 18,580	\$ 5,580
Total Direct Expenses	\$ 291,042	\$ 349,644	\$ 58,602	\$ 340,889	\$ 49,847
Indirect Expenses	\$ 176,678	\$ 176,678	\$ -	\$ 198,132	\$ 21,454
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ 467,720	\$ 526,322	\$ 58,602	\$ 539,021	\$ 71,301
Change in Assets	\$ 9,896	\$ (48,706)	\$ (58,602)	\$ 4,581	\$ (5,315)
Fixed Assets					
Depreciation	\$ -	\$ -	\$ -	\$ -	\$ -
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	\$ 9,896	9,896	-	4,581	(5,315)
Inc(Dec) in Fixed Assets (C)	9,896	9,896	-	4,581	(5,315)
TOTAL BUDGET (=B + C)	\$ 477,616	\$ 536,218	\$ 58,602	\$ 543,602	\$ 65,986
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ -	\$ (58,602)	\$ (58,602)	\$ -	\$ -
FTEs	1.59	1.51	(0.08)	1.51	(0.08)

2. Compliance Monitoring and Enforcement and Organization Registration and Certification Program

Compliance Monitoring and Enforcement and Organization Registration and Certification Program (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	19.16	18.99	(0.2)
Direct Expenses	\$ 3,650,422	\$ 3,586,378	\$ (64,043)
Indirect Expenses	\$ 2,129,027	\$ 2,491,737	\$ 362,710
Other Non-Operating Expenses	\$ -	\$ -	\$ -
Inc(Dec) in Fixed Assets	\$ 119,255	\$ 57,611	\$ (61,644)
Total Funding Requirement	\$ 5,898,704	\$ 6,135,726	\$ 237,023

Program Scope and Functional Description

In 2013, the MRO Compliance Monitoring and Enforcement Program (CMEP) includes performing CMEP activities with approximately 125 Registered Entities in the MRO Region.

All Registered Entities are subject to periodic audit and/or spot checks. For 2013, there are a total of 20 compliance audits planned and spot checks will be done as needed.

In addition to the normal and ongoing compliance discovery activities under the NERC CMEP, MRO compliance staff will be prepared to conduct compliance investigations, system performance monitoring and assessment, and compliance reviews for all events in which the NERC Event Analysis and Compliance Review Process is initiated. These activities are included in the business plan for 2013. Investigations are handled through MRO's Risk Assessment and Mitigation team.

2013 Key Assumptions

NERC and Regional Entity business plans and budgets reflect a set of common assumptions developed jointly by NERC and the Regional Entities as part of the annual business plan and budget process. The common assumptions for the Compliance Monitoring and Organization Registration and Certification Program can be located in the Key Assumptions section of Exhibit A in NERC's 2013 Business Plan and Budget.

MRO will monitor compliance with Reliability Standards for each Registered Entity that has compliance responsibilities as defined in the Compliance Registry for MRO. In the United States, MRO monitors Reliability Standards according to Commission-approved Rules. In Saskatchewan and Manitoba, MRO carries out its compliance monitoring responsibilities according to agreements with the respective provincial authorities.

Organization Registration criteria and requirements are approved by NERC and the Commission in the United States, and MRO staff carries out those responsibilities through its Delegation Agreement with NERC. Registration is documented by MRO and incorporated into the overall

NERC Registry. MRO staff registers all known entities (owners, operators, and users) subject to the Reliability Standards and revises the Registered Entity list as required under the Rules.

MRO staff will conduct and assist NERC staff with Organization Certifications for the applicable functions determined by the NERC Compliance and Certification Committee (NERC CCC), and by following procedures developed by NERC and the NERC CCC.

2013 Compliance Monitoring Program Goals and Key Deliverables

- Conduct secondary independent review to assure all determinations of possible violations are accurate, complete, and technically sufficient
- Maintain an accurate and up-to-date detailed Compliance Registry for MRO
- Assure professionally trained staff are available to perform the required activities under the Rules
- Deliver consistent results across all discovery methods
- Process initial compliance determinations of standards in a fair, uniform, systematic, and timely manner
- Maintain internal controls for “one-up, and next door” reviews to assure all determinations receive adequate “due care” and review
- Ensure an accurate and complete discovery record is created, maintained, and retained for each possible violation discovered and where there are no findings as well
- Conduct system performance compliance monitoring (such as due diligence review of misoperations, physical inspections, etc.)
- Lead compliance investigations as warranted
- Continue to maintain information in a secured environment through webCDMS; expand webCDMS tool suite for staff to drive more efficiencies in the conduct of the work and make the work more meaningful to Registered Entities
- Participate in working groups where continent-wide compliance program processes and procedures will be developed to drive consistency

Funding Requirements — Explanation of Increase (Decrease)

Compliance Monitoring Explanation of Variances – 2013 Budget versus 2012 Budget

Entity (Organization) Registration

- 2013 Variance: no material changes
- Workload associated with maintaining the registry will continue
- Pre-June 18, 2007 voluntary program (28 participants/255 functions)
- June 18, 2007 mandatory implementation (110 Registered Entities/432 functions)
- March 2012 (125 Registered Entities/502 functions)
- Registration is an ongoing assignment
 - Continue to inventory generator facilities and transmission elements that meet NERC Criteria of Registration
 - Joint Registration Organization (JRO) maintenance
 - Coordinated Registration Organization (CFR) development and maintenance

-
- Modify registry if it's discovered an entity meets additional functional criteria through compliance monitoring processes
 - Continue to obtain and review system one-line diagrams, maps, and agreements used to identify owners and operators of the BES
 - Continue to manage overall registry by having a staff person directly assigned to this task

Entity (Organization) Certification

- 2013 Variance: no material changes.
- Work performed to certify additional functions with Registered Entities, and work performed to certify new Registered Entities, are expected to continue. The equivalent rate or amount of work is expected to “hold steady” in 2013 (no change).

Annual Implementation Plan

- 2013 Variance: increase of workload.
- The scope of the compliance program plan is assumed to maintain steady in 2013.
 - Monitor compliance with all regulatory approved Reliability Standards as defined in the NERC Annual Implementation Plan.
 - It is assumed that the NERC 2013 Implementation Plan will hold steady for the other monitoring methods including monthly self-certification, quarterly self-certification, periodic data submittal, exception report, and spot-check, when compared to the 2012 Implementation Plan.
 - Unscheduled spot-checks and/or audits are conducted if:
 - Entity registration changes (such as adding TOP, BA, RC function)
 - Evidence of compliance provided during an audit (or other method) is found to be non-compliant and the entity is using another entity's program or process
 - Follow-up from self-certifications or events

Planned Audits (Operating and Planning Standards)

- 2013 Variance: increase of workload.
- The number of audits to be performed in 2013 is 20, which is an increase by one compared to 2012.

Planned Audits (CIP Standards)

- 2013 Variance: consistent workload.
- The number of audits to be performed in 2013 is 20, which is consistent compared to 2012. In addition, Technical Feasibility Exceptions (TFEs) will continue to be managed on an ongoing basis, and will be included in the audit.

Annual Self-Certification Requirement

- 2013 Variance: consistent in workload.
- The number of entities participating in the annual self-certification is 125 for 2013.
- It is assumed that the NERC 2013 Implementation Plan, which identifies the Reliability Standard requirements to be monitored through annual self-certification, is reduced due to the reduction in the number of standards audited at an entity.

Compliance Investigations (CIs)

- 2013 Variance: increase in workload.
- MRO compliance staff will assume the lead on investigations in MRO region, rather than relying on NERC (because NERC resources are being used on larger events).

Compliance Possible Violation Discovery

- 2013 Variance: increase of workload.
- Will be reduced by the number of standards monitored through compliance audits.
- For every possible violation, the MRO mitigation and risk assessment staff performs a fact and circumstance review.
- An increase of workload in this area is assumed due to the expanded scope of compliance monitoring resulting from the new Reliability Standards and the expanded scope of system performance monitoring.

Compliance Possible Violation Record Development

- 2013 Variance: increase of workload in 2013 from 2012.
- A discovery record is developed for every possible violation. The discovery record and supplemental forms represent the initial development of the enforcement disposition record.
- The number of discovered violations is expected to increase as explained above, which will ultimately increase the number of required discovery records.

Compliance Enforcement Explanation of Variances – 2013 Budget versus 2012 Budget***2013 Key Assumptions***

The NERC and Regional Entity business plans and budgets reflect a set of common assumptions developed jointly by NERC and the Regional Entities as part of the annual business plan and budget process. The common assumptions for Enforcement can be located in the Key Assumptions section of Exhibit A in NERC's 2012 Business Plan and Budget.

Processing of Alleged Violations

As the CMEP has matured, the number of alleged violations of the Operations and Planning Standards is anticipated to reach a relatively stable state in 2013, while the number of alleged violations of the Critical Infrastructure Protection Standards is expected to continue to increase in 2013. For every Possible Violation identified by MRO compliance staff or a Registered Entity, MRO enforcement staff performs a preliminary screen to confirm its validity based on the criteria defined in the CMEP. For Possible Violations deemed valid, MRO enforcement staff prepares and issues a Notice of Possible Violation and performs a facts and circumstances review to determine if the Registered Entity was or was not in violation of the Reliability Standard(s). If the Registered Entity is in violation of a Standard, MRO enforcement staff prepares both a Disposition Document and Notice of Alleged Violation for each alleged violation or a Notice of Find, Fix, Track and Report (FFT) processing for each unmediated issue. Where a Notice of Alleged Violation is issued, a proposed penalty is calculated and reviewed and considered by at least two MRO enforcement staff. Upon acceptance or lapse of the required time for response to the Notice of Alleged Violation, MRO enforcement staff prepares a Notice of Confirmed Violation (NOCV). The drafting of these notices is an iterative process and requires resources.

MRO enforcement staff anticipates a small percentage of violations will be resolved through the settlement process. MRO expects the FFT process to reduce administrative costs in the enforcement area.

Mitigation Plan Acceptance and Verification of Completion

- 2013 Variance: consistent with 2012 workload
- MRO uses number of days in violation process (DIVP) and violation aging as key indicators for process efficiency and effectiveness. Due primarily to CIP violations, the number of days has increased and therefore, we are devoting more resources in this area. Further, MRO assumes an increase in the number and frequency of violations discovered with the inclusion of the CIP Standards and 41 Requirements.
- For every Alleged Violation identified by MRO staff, a mitigation plan must be submitted. MRO mitigation and risk assessment staff reviews each submitted mitigation plan to assess whether the proposed plan will mitigate and prevent reoccurrence of the subject violation. The development of the mitigation plan provides the information necessary to determine the potential and actual risk to the reliability of the BES

Record Development and Maintenance

- Processes have been formalized and necessary documentation identified to complete the record. The webCDMS application provides for a central repository accessible to each Registered Entity to submit and review its evidence.

Funding Sources and Requirements — Explanation of Increase (Decrease)

For 2013, the compliance monitoring workload will remain consistent.

Funding Sources (Other than ERO Assessments)

- Penalty Sanctions – Total penalty monies to be received (and currently in escrow) and the allocation method used to allocate funds to this Program as an offset to assessments are disclosed in MRO’s Supplemental Financial Information section, Table B-2, page 63.

Personnel Expenses

- The overall budgeted FTE count for Compliance will remain steady over the 2012 when compared to the FTE count at year-end 2012.
- Budgeted payroll taxes, benefits and retirement costs reflect an average cost per employee. Please refer to Section 4 Account Methodology, Personnel Expenses which explains MRO’s 2012 personnel cost fluctuations most notable in the retirement costs.

Meeting Expenses

- Recognizing new facility savings in meeting costs due to hosting more meetings in the office versus renting a meeting room.

Travel Expense

- Expenditures in the “travel” account will be slightly increased in 2013 primarily due to anticipation of higher airline costs.

Conference Calls

- Expenditures in conference calls in 2013 are expected to remain steady. These efficiencies are identified as improved communications with Registered Entities, as well as reduced time spent on-site.

Operating Expenses

- **Consultants and Contracts**

Expenditures on contracts in 2013 will decrease due to the additional staff hired in 2012. By using in-sourced “core” responsibilities MRO is reducing consultant and contractor costs.

Greater efficiencies are expected with the third party vendor as additional regions expand the common IT platform increasing scale and reducing costs by spreading costs across the increased number of participating regions.

- **Office Costs**

The “office costs” account for 2013 will decrease in training costs for the staff due to reduction in tuition, as the existing staff has acquired the necessary certifications in 2011 and 2012. MRO has its own credential and experience requirements for personnel in the audit area. As our current staff gains experience, as well as hiring experienced staff in 2011, we are using in-sourced “core” responsibilities and MRO can reduce their training/tuition costs.

Indirect Expenses

- Expenses related to indirect programs have been allocated proportionately based on FTE count to the direct programs. There is an increase in the indirect expenses in 2013 Budget as a result of higher FTEs in the Administrative Services, as well as an increase in the new facility lease costs. The facility cost increase is offset by a reduction in costs for meetings.

Other Non-Operating Expenses

- N/A

Fixed Asset Additions

- 2013 Fixed assets related to indirect programs have been allocated proportionately based on FTE to the direct programs.

Compliance Enforcement and Organization Registration and Certification Program

Funding sources and related expenses for the Compliance Enforcement and Organization Registration and Certification section of the 2013 business plan are shown in the table below.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
COMPLIANCE MONITORING, ENFORCEMENT and ORGANIZATION REGISTRATION and CERTIFICATION					
	2012 Budget	2012 Projection	Variance 2012 Projection v 2012 Budget Over(Under)	2013 Budget	Variance 2013 Budget v 2012 Budget Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ 5,623,628	\$ 5,623,628	\$ -	\$ 6,126,145	\$ 502,517
Penalty Sanctions	275,076	275,076	-	9,581	(265,495)
Total NERC Funding	\$ 5,898,704	\$ 5,898,704	\$ -	\$ 6,135,726	\$ 237,022
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Total Funding (A)	\$ 5,898,704	\$ 5,898,704	\$ -	\$ 6,135,726	\$ 237,022
Expenses					
Personnel Expenses					
Salaries	\$ 2,393,505	\$ 2,084,057	\$ (309,448)	\$ 2,372,105	\$ (21,400)
Payroll Taxes	146,389	138,581	(7,808)	159,443	13,054
Benefits	219,744	164,401	(55,343)	203,097	(16,647)
Retirement Costs	285,616	350,057	64,441	393,579	107,963
Total Personnel Expenses	\$ 3,045,254	\$ 2,737,096	\$ (308,158)	\$ 3,128,224	\$ 82,970
Meeting Expenses					
Meetings	\$ 6,200	\$ 6,200	\$ -	\$ 5,600	\$ (600)
Travel	189,199	203,729	14,530	200,300	11,101
Conference Calls	9,200	9,200	-	8,400	(800)
Total Meeting Expenses	\$ 204,599	\$ 219,129	\$ 14,530	\$ 214,300	\$ 9,701
Operating Expenses					
Consultants & Contracts	\$ 302,000	\$ 302,000	\$ -	\$ 157,000	\$ (145,000)
Office Rent	-	-	-	-	-
Office Costs	83,572	83,572	-	79,354	(4,218)
Professional Services	15,000	15,000	-	7,500	(7,500)
Miscellaneous	-	-	-	-	-
Depreciation	-	-	-	-	-
Total Operating Expenses	\$ 400,572	\$ 400,572	\$ -	\$ 243,854	\$ (156,718)
Total Direct Expenses	\$ 3,650,425	\$ 3,356,797	\$ (293,628)	\$ 3,586,378	\$ (64,047)
Indirect Expenses	\$ 2,129,027	\$ 2,129,027	\$ -	\$ 2,491,737	\$ 362,710
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ 5,779,452	\$ 5,485,824	\$ (293,628)	\$ 6,078,115	\$ 298,663
Change in Assets	\$ 119,252	\$ 412,880	\$ 293,628	\$ 57,611	\$ (61,641)
Fixed Assets					
Depreciation	-	-	-	-	-
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	0
Equipment CapEx	-	-	-	-	0
Leasehold Improvements	-	-	-	-	0
Allocation of Fixed Assets	\$ 119,255	119,255	-	57,611	(61,644)
Inc(Dec) in Fixed Assets (C)	\$ 119,255	\$ 119,255	\$ -	\$ 57,611	\$ (61,644)
TOTAL BUDGET (=B + C)	\$ 5,898,707	\$ 5,605,079	\$ (293,628)	\$ 6,135,726	\$ 237,019
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ (3)	\$ 293,625	\$ 293,628	\$ -	\$ 3
FTEs	19.16	17.17	(1.99)	18.99	(0.17)

3. Reliability Assessment and Performance Analysis Program

Reliability Assessments and Performance Analysis (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	8.04	6.68	(1.36)
Direct Expenses	\$ 1,491,556	\$ 1,380,677	\$ (110,879)
Indirect Expenses	\$ 893,391	\$ 876,504	\$ (16,887)
Other Non-Operating Expenses	\$ -	\$ -	\$ -
Inc(Dec) in Fixed Assets	\$ 50,042	\$ 20,265	\$ (29,777)
Total Funding Requirement	\$ 2,434,989	\$ 2,277,446	\$ (157,544)

Program Scope and Functional Description

The objectives of the Reliability Assessment and Performance Analysis Program are to:

1. Review pre and post seasonal and long-term reliability assessments for the MRO Region in order to assess operating reliability and resource adequacy.
2. Review event analysis efforts by Registered Entities to ensure causes are identified and corrected and that lessons learned are shared with industry.
3. Assemble modeling data and prepare models.
4. Perform legacy Regional Reliability Organization functions until those functions are assigned to registered entities through Reliability Standards (fill in the blank standards).
5. Support MRO stakeholder groups and participate in NERC efforts.

2013 Key Assumptions

The NERC and Regional Entity business plans and budgets reflect a set of common assumptions developed jointly by NERC and the Regional Entities as part of the annual business plan and budget process. The common assumptions for the Reliability Assessment and Performance Analysis Program can be located in the Key Assumptions section of Exhibit A in NERC's 2013 Business Plan and Budget.

MRO analyzes, assesses, and reports on reliability and adequacy in the past, present, and future. This includes the long-term and seasonal assessments developed by Planning Authorities, and reviewed by the MRO Operating Committee ("OC") and the Planning Committee ("PC"), as required by the Delegation Agreement. In addition, specific possible scenarios may be evaluated.

The OC and PC have balanced stakeholder representation, work with MRO staff, and report to the MRO Board. The OC and PC review and consolidate the reports of the overall reliability of the MRO Region, both existing and planned. The OC and PC verify that assessments performed within the MRO Region conform to MRO and NERC Reliability Standards related to system performance.

In 2013, continued attention will be given to transmission adequacy and security, protection and control standards, special protection scheme reviews, resource adequacy, demand response, reliability metrics, integration of renewable generation per Renewable Portfolio Standards, operational issues and event analysis, Eastern Interconnection Reliability Assessment Group (“ERAG”), NERC and regulatory data requests, electric system modeling data, and reviews of regional reliability criteria and procedures. The collection and validation of GADS, TADS and DADS will add to MRO’s workload as will efforts related to BES exception reporting. MRO did not include any resource requirements directly relating to the BES exception reporting due to the uncertainty.

2013 Goals and Key Deliverables

- Annually review the overall reliability of the MRO Region and interregional BES for near-term and long-term planning horizons and provide planning horizon (“LTRA”) assessment reports to the Board and NERC
- Review the seasonal assessments (summer and winter) of the MRO Region and interregional BES from an operational perspective
- Review the post seasonal assessments (summer and winter) of the BES to determine if the system performed according to the preseason plans
- Review system disturbance reports and event analyses to assure the appropriate analysis is performed and that lessons learned are identified and shared with the industry
- Annually (or as often as required by NERC), assess the MRO Region for an emerging issue/scenario as determined by NERC
- Perform special reliability assessments on a Regional, Interregional, and Interconnection basis as conditions warrant, or as directed by the Board or NERC
- Coordinate with NERC on system event analyses on a Regional, Interregional, and Interconnection basis as conditions warrant
- Annually prepare an MRO set of electric system modeling data
- Perform legacy Regional Reliability Organization (“RRO”) responsibilities associated with “fill in the blank” standards such as the PRC Standards, including mis-operations, review of special protection schemes, UFLS criteria, disturbance monitoring criteria, etc. until these responsibilities are transitioned to Registered Entities
- Perform all regional responsibilities associated with the existing and future Reliability Standards, as they apply to MRO
- Participate in and represent the MRO Region in all ERAG and NERC groups, as required, that report to the ERAG Management Committee (“MC”) and NERC Planning Committee (“PC”) and Operating Committee (“OC”)

Funding Sources and Requirements — Explanation of Increase (Decrease)

Funding Sources (Other than ERO Assessments)

- Penalty Sanctions – Total penalty monies to be received (and in escrow) and the allocation method used to allocate funds to this Program as an offset to assessments are disclosed in MRO’s Supplemental Financial Information section, Table B-2, page 63.

Personnel Expenses

- This item is expected to decrease due to a lower FTE in 2013 than in 2012 Budget. MRO replaced a FTE with a seasonal FTE. Combined with existing staff that allows us to do more with less FTEs. Please refer to Section 4 Account Methodology, Personnel Expenses which explains MRO's 2012 personnel cost fluctuations most notable in the retirement costs.

Meeting Expenses

- Recognizing new facility savings in meeting costs due to hosting more meetings in the office versus renting a meeting room. Expenditures in the “meeting expense” account are expected to be lower 2013.

Operating Expenses

- Contracts expense increases in 2013. Cost includes administration of the NERC Alerts and Event Analysis work.
- Consulting costs increases in 2013 due to higher future costs for renewal or replacement of contracts reaching expiration.

Indirect Expenses

- Expenses related to indirect programs have been allocated proportionately based on FTE count to the direct programs. This method of accounting results in a decrease compared to 2012 based upon a reduction in FTEs in this program.

Other Non-Operating Expenses

- N/A

Fixed Asset Additions

- 2013 Fixed assets related to indirect programs have been allocated proportionately based on FTE to the direct programs.

Reliability Assessment and Performance Analysis Program

Funding sources and related expenses for the Reliability Assessment and Performance Analysis section of the 2013 business plan are shown in the table below.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital 2012 Budget & Projection, and 2013 Budget					
RELIABILITY ASSESSMENTS and PERFORMANCE ANALYSIS					
	2012 Budget	2012 Projection	Variance 2012 Projection v 2012 Budget Over(Under)	2013 Budget	Variance 2013 Budget v 2012 Budget Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ 2,319,561	\$ 2,319,561	\$ -	\$ 2,274,076	\$ (45,485)
Penalty Sanctions	115,428	115,428	-	3,370	(112,058)
Total NERC Funding	\$ 2,434,989	\$ 2,434,989	\$ -	\$ 2,277,446	\$ (157,543)
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Total Funding (A)	\$ 2,434,989	\$ 2,434,989	\$ -	\$ 2,277,446	\$ (157,543)
Expenses					
Personnel Expenses					
Salaries	\$ 897,570	\$ 777,555	\$ (120,015)	\$ 795,326	\$ (102,244)
Payroll Taxes	70,021	51,486	(18,535)	54,654	(15,367)
Benefits	92,219	64,020	(28,199)	71,795	(20,424)
Retirement Costs	127,696	155,615	27,919	160,752	33,056
Total Personnel Expenses	\$ 1,187,506	\$ 1,048,676	\$ (138,830)	\$ 1,082,527	\$ (104,979)
Meeting Expenses					
Meetings	\$ 35,000	\$ 35,000	\$ -	\$ 20,000	\$ (15,000)
Travel	96,500	96,500	-	106,150	9,650
Conference Calls	7,500	7,500	-	2,500	(5,000)
Total Meeting Expenses	\$ 139,000	\$ 139,000	\$ -	\$ 128,650	\$ (10,350)
Operating Expenses					
Consultants & Contracts	\$ 124,700	\$ 124,700	\$ -	\$ 141,100	\$ 16,400
Office Rent	-	-	-	-	-
Office Costs	40,350	40,350	-	28,400	(11,950)
Professional Services	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Depreciation	-	-	-	-	-
Total Operating Expenses	\$ 165,050	\$ 165,050	\$ -	\$ 169,500	\$ 4,450
Total Direct Expenses	\$ 1,491,556	\$ 1,352,726	\$ (138,830)	\$ 1,380,677	\$ (110,879)
Indirect Expenses	\$ 893,391	\$ 893,391	\$ -	\$ 876,504	\$ (16,887)
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ 2,384,947	\$ 2,246,117	\$ (138,830)	\$ 2,257,181	\$ (127,766)
Change in Assets	\$ 50,042	\$ 188,872	\$ 138,830	\$ 20,265	\$ (29,777)
Fixed Assets					
Depreciation	-	-	-	-	-
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	\$ 50,042	50,042	\$ -	20,265	(29,777)
Inc(Dec) in Fixed Assets (C)	\$ 50,042	\$ 50,042	\$ -	\$ 20,265	\$ (29,777)
TOTAL BUDGET (=B + C)	\$ 2,434,989	\$ 2,296,159	\$ (138,830)	\$ 2,277,446	\$ (157,543)
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ -	\$ 138,830	\$ 138,830	\$ -	\$ -
FTEs	8.04	6.68	(1.36)	6.68	(1.36)

4. Training, Education, and Operator Certification Program

Training, Education and Operator Certification (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	0.18	0.27	0.09
Direct Expenses	\$ 152,666	\$ 193,171	\$ 40,505
Indirect Expenses	\$ 20,001	\$ 35,428	\$ 15,427
Other Non-Operating Expenses	\$ -	\$ -	\$ -
Inc(Dec) in Fixed Assets	\$ 1,120	\$ 819	\$ (301)
Total Funding Requirement	\$ 173,788	\$ 229,418	\$ 55,631

Program Scope and Functional Description

Maintaining the reliability of the BES through implementation of the Reliability Standards requires informed and trained Regional and Registered Entity personnel. Education and training is one of the primary objectives of MRO. The education and training program specifically pertains to the implementation of the CMEP, the application of Reliability Standards, Reliability Assessment information, performing quality event analysis, identifying lessons learned from event analysis, expectations and responsibilities for the “fill in the blank” standards, and other related information pertinent to system reliability and compliance. The target audience for this program is Registered Entities.

MRO will provide training to Registered Entities through workshops, conferences, presentation opportunities at industry meetings and by providing lessons learned in MRO’s newsletter and other publications. MRO will continue to identify training opportunities for Registered Entities.

The objectives outlined in the key assumptions are intended to educate and train the industry on CMEP implementation, the requirements and application of the Standards, lessons learned, and elements of an effective compliance program.

2013 Key Assumptions

The NERC and Regional Entity business plans and budgets reflect a set of common assumptions developed jointly by NERC and the Regional Entities as part of the annual business plan and budget process. The common assumptions for the Training, Education, and Operator Certification Program can be located in the Key Assumptions section of Exhibit A in NERC’s 2013 Business Plan and Budget.

Registered Entities should have processes and procedures in place to ensure adherence with the Reliability Standards and address risks to reliability, which is why education and training is a key initiative for MRO. The MRO Compliance Committee assists and oversees the compliance and enforcement training and education initiatives for Registered Entities, including participation on CMEP workshops, and stakeholder forums and group training initiatives. The MRO Standards

Committee assists and oversees the Reliability Standard requirement and application training for Registered Entities, and the Planning and Operating Committees contribute to planning Reliability Conferences

The MRO Hearing Body has a defined role in the implementation of the Compliance Enforcement portion of the program. MRO organizes and administers compliance enforcement training for Hearing Body participants.

2013 Goals and Key Deliverables

In addition to the MRO management team participating in, and presenting at, various forum meetings (such as Transmission Forum, Generation Forum, MCCF, RTO/ISO, APDA, State Regulator meetings, etc.), MRO will provide four training forums (one CMEP workshop, one Reliability Conference, one Standards Workshop, and one Hearing Body training conference).

Funding Sources and Requirements — Explanation of Increase (Decrease)

For 2013, MRO will provide training to Registered Entities through workshops, presentation opportunities at industry meetings and by providing lessons learned in MRO's newsletter and other publications. MRO will continue to try to identify training options for Registered Entities in the MRO Region so that they can also accomplish the objectives of the NERC program through a third party.

Funding Sources (Other than ERO Assessments)

- Penalty Sanctions – Total penalty monies to be received (in escrow) and the allocation method used to allocate funds to this Program as an offset to assessments are disclosed in MRO's Supplemental Financial Information section, Table B-2, page 63.

Personnel Expenses

- Budgeted payroll taxes, benefits and retirement costs reflect an increase in the actual trend of executive involvement in the workshops, newsletters, and speaker engagements.

Meeting Expenses

- Expenditures in the “meeting expense” account will increase in 2013. Although our new facility enables a lower cost per meeting, we are anticipating a higher number of meetings with application guides and model controls and procedures developed and presented by stakeholders.

Travel Expenses

- Expenditures in “travel expense” account will decrease in 2013. The 2013 Budget reflects the lower trending in 2012 of member reimbursement for stakeholders presenting to other stakeholders.

Operating Expenses

- Office Costs – “office costs” account will hold steady in 2013.

Indirect Expenses

- Expenses related to indirect programs have been allocated proportionately based on FTE count to the direct programs. There is an increase in the indirect expenses in 2013 Budget as a result of higher FTEs in the Administrative Services, as well as an increase in

the new facility lease costs. The facility increase is offset by a reduction in costs for meetings.

Other Non-Operating Expenses

- N/A

Fixed Asset Additions

- 2013 Fixed assets related to indirect programs have been allocated proportionately based on FTE to the direct programs.

Training, Education, and Operator Certification Program

Funding sources and related expenses for the Training, Education, and Operator Certification section of the 2013 business plan are shown in the table below.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
TRAINING, EDUCATION and OPERATOR CERTIFICATION					
	2012 Budget	2012 Projection	Variance 2012 Projection v 2012 Budget Over(Under)	2013 Budget	Variance 2013 Budget v 2012 Budget Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ 171,203	\$ 171,203	\$ -	\$ 229,281	\$ 58,078
Penalty Sanctions	2,584	2,584		136	(2,448)
Total NERC Funding	\$ 173,787	\$ 173,787	\$ -	\$ 229,418	\$ 55,631
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Total Funding (A)	\$ 173,787	\$ 173,787	\$ -	\$ 229,418	\$ 55,631
Expenses					
Personnel Expenses					
Salaries	\$ 35,852	\$ 69,667	\$ 33,815	\$ 65,436	\$ 29,584
Payroll Taxes	2,095	2,439	344	2,231	136
Benefits	2,065	1,849	(216)	1,935	(130)
Retirement Costs	6,154	12,270	6,116	11,469	5,315
Total Personnel Expenses	\$ 46,166	\$ 86,225	\$ 40,059	\$ 81,071	\$ 34,905
Meeting Expenses					
Meetings	\$ 48,500	\$ 46,700	\$ (1,800)	\$ 63,500	\$ 15,000
Travel	38,000	38,000	-	28,600	(9,400)
Conference Calls	15,000	15,000	-	15,000	-
Total Meeting Expenses	\$ 101,500	\$ 99,700	\$ (1,800)	\$ 107,100	\$ 5,600
Operating Expenses					
Consultants & Contracts	\$ -	\$ -	\$ -	\$ -	\$ -
Office Rent	-	-	-	-	-
Office Costs	5,000	5,000	-	5,000	-
Professional Services	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Depreciation	-	-	-	-	-
Total Operating Expenses	\$ 5,000	\$ 5,000	\$ -	\$ 5,000	\$ -
Total Direct Expenses	\$ 152,666	\$ 190,925	\$ 38,259	\$ 193,171	\$ 40,505
Indirect Expenses	\$ 20,001	\$ 20,001	\$ -	\$ 35,428	\$ 15,427
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ 172,667	\$ 210,926	\$ 38,259	\$ 228,599	\$ 55,932
Change in Assets	\$ 1,120	\$ (37,139)	\$ (38,259)	\$ 819	\$ (301)
Fixed Assets					
Depreciation	-	-	-	-	-
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	\$ 1,120	1,120	-	819	(301)
Inc(Dec) in Fixed Assets (C)	\$ 1,120	\$ 1,120	\$ -	\$ 819	\$ (301)
TOTAL BUDGET (=B + C)	\$ 173,787	\$ 212,046	\$ 38,259	\$ 229,418	\$ 55,631
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ -	\$ (38,259)	\$ (38,259)	\$ -	\$ -
FTEs	0.18	0.27	0.09	0.27	0.09

5. Situation Awareness and Infrastructure Security Program

Situation Awareness and Infrastructure Security (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	0.18	0.30	0.12
Direct Expenses	\$ 59,508	\$ 57,074	\$ (2,434)
Indirect Expenses	\$ 20,001	\$ 39,364	\$ 19,363
Other Non-Operating Expenses	\$ -	\$ -	\$ -
Inc(Dec) in Fixed Assets	(7,378)	910	8,288
Total Funding Requirement	\$ 72,131	\$ 97,348	\$ 25,217

Situation Awareness Program Scope and Functional Description

NERC and the Regions shall, through Reliability Coordinators and available tools, monitor present conditions on the bulk electric system and provide leadership coordination, technical expertise, and assistance to the industry in responding to events as necessary.

To accomplish these goals, NERC and the Regions will:

1. Maintain situation awareness of conditions on the bulk electric system;
2. Notify the industry of significant bulk electric system events that have occurred in one area, and which have the potential to impact reliability in other areas;
3. Maintain and strengthen high-level communication, coordination, and cooperation with governments and government agencies regarding real-time conditions; and
4. Enable the reliable operation of interconnected bulk electric systems by facilitating information exchange and coordination among reliability service organizations.

2013 Key Assumptions

The NERC and Regional Entity business plans and budgets reflect a set of common assumptions developed jointly by NERC and the Regional Entities as part of the annual business plan and budget process. The common assumptions for the Situation Awareness and Infrastructure Security Program can be located in the Key Assumptions section of Exhibit A in NERC's 2013 Business Plan and Budget.

The Situation Awareness program includes costs and resources to review and to respond to incidents and events that impact the reliability of the BES and respond to inquiries by NERC or others.

2013 Goals and Key Deliverables

The goal of the Situation Awareness program is to maintain awareness about the conditions of the BES and to respond to events by providing coordination assistance and communications between key parties. In 2013, staff will participate in the development of the second phase of the situation awareness tools and related processes.

Infrastructure Security Program Scope and Functional Description

NERC and the Regions coordinate electric industry activities to promote critical infrastructure protection of the BES in North America by taking a leadership role in critical infrastructure protection of the electricity sector to reduce vulnerability and improve mitigation and protection of the electricity sector's critical infrastructure.

2013 Key Assumptions

The NERC and Regional Entity business plans and budgets reflect a set of common assumptions developed jointly by NERC and the Regional Entities as part of the annual business plan and budget process. The common assumptions for Critical Infrastructure Protection can be located in the Key Assumptions section of Exhibit A in NERC's 2013 Business Plan and Budget.

The Infrastructure Security Program is responsible for raising the awareness of security, promoting standard security practices, and aiding the Registered Entities in organizing and sharing security implementations specific to the electric utility sector.

The MRO Standards Committee will participate in the development of CIP standards, develop guidance on the application of standards, and provide opportunities for sharing security implementation approaches utilized by Registered Entities. The Standards Committee is comprised of MRO sector representatives and facilitated by MRO staff. Regional representatives also participate on the NERC Critical Infrastructure Protection Committee ("CIPC").

The Operations Group within MRO have Situational Awareness responsibilities, which are budgeted in their respective areas.

2013 Goals and Key Deliverables

The goal is to provide effective communication, coordination and industry facilitation of all areas of security to ensure the region is prepared for cyber-related incidents.

Funding Requirements – Explanation of Increase (Decrease)

The 2013 Budget includes dollars for the MRO Standards Committee's travel to attend security related meetings and conferences.

Funding Sources (Other than ERO Assessments)

- Penalty Sanctions – Total penalty monies to be received (in escrow) and the allocation method used to allocate funds to this Program as an offset to assessments are disclosed in MRO's Supplemental Financial Information section, Table B-2, page 63.

Personnel Expenses

- Personnel costs for 2013 Budget have a slight increase. Costs are anticipated to be relatively steady year over year.

Meeting Expenses

- Meeting expenses will reduce slightly. The 2013 Budget reflects the lower trending in 2011 and 2012 of travel costs.

Operating Expenses

- Office expenses are increased slightly with anticipated additional staff SCADA training. Overall operating expenses have reduced due to the elimination of the depreciation expense relating to the former facility and no longer amortizing the Situation Room which had been a leasehold improvement at MRO's former facility.

Indirect Expenses

- Expenses related to indirect programs have been allocated proportionately based on FTE count to the direct programs. There is an increase in the indirect expenses in 2013 Budget as a result of higher FTEs in the Administrative Services, as well as an increase in the new facility lease costs. The facility increase is offset by a reduction in costs for meetings.

Other Non-Operating Expenses

- N/A

Fixed Asset Additions

- 2013 Fixed assets related to indirect programs have been allocated proportionately based on FTE to the direct programs.

Situation Awareness and Infrastructure Security Program

Funding sources and related expenses for the Situation Awareness and Infrastructure Security section of the 2013 business plan are shown in the table below.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital 2012 Budget & Projection, and 2013 Budget					
SITUATION AWARENESS and INFRASTRUCTURE SECURITY					
	2012 Budget	2012 Projection	Variance 2012 Projection v 2012 Budget Over(Under)	2013 Budget	Variance 2013 Budget v 2012 Budget Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ 69,547	\$ 69,547	\$ -	\$ 97,197	\$ 27,650
Penalty Sanctions	2,584	2,584	-	151	(2,433)
Total NERC Funding	\$ 72,131	\$ 72,131	\$ -	\$ 97,348	\$ 25,217
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Total Funding (A)	\$ 72,131	\$ 72,131	\$ -	\$ 97,348	\$ 25,217
Expenses					
Personnel Expenses					
Salaries	\$ 30,779	\$ 30,181	\$ (598)	\$ 37,373	\$ 6,594
Payroll Taxes	2,031	1,368	(663)	1,824	(207)
Benefits	2,065	1,388	(677)	1,935	(130)
Retirement Costs	6,135	6,475	340	7,642	1,507
Total Personnel Expenses	\$ 41,010	\$ 39,412	\$ (1,598)	\$ 48,774	\$ 7,764
Meeting Expenses					
Meetings	\$ -	\$ -	\$ -	\$ -	\$ -
Travel	7,000	7,000	-	3,300	(3,700)
Conference Calls	-	-	-	-	-
Total Meeting Expenses	\$ 7,000	\$ 7,000	\$ -	\$ 3,300	\$ (3,700)
Operating Expenses					
Consultants & Contracts	\$ -	\$ -	\$ -	\$ -	\$ -
Office Rent	-	-	-	-	-
Office Costs	3,000	3,000	-	5,000	2,000
Professional Services	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Depreciation	8,498	8,498	-	-	(8,498)
Total Operating Expenses	\$ 11,498	\$ 11,498	\$ -	\$ 5,000	\$ (6,498)
Total Direct Expenses	\$ 59,508	\$ 57,910	\$ (1,598)	\$ 57,074	\$ (2,434)
Indirect Expenses	\$ 20,001	\$ 20,001	\$ -	\$ 39,364	\$ 19,363
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ 79,509	\$ 77,911	\$ (1,598)	\$ 96,438	\$ 16,929
Change in Assets	\$ (7,378)	\$ (5,780)	\$ 1,598	\$ 910	\$ 8,288
Fixed Assets					
Depreciation	(8,498)	(8,498)	-	-	8,498
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	\$ 1,120	1,120	-	910	(210)
Inc(Dec) in Fixed Assets (C)	\$ (7,378)	\$ (7,378)	\$ -	\$ 910	\$ 8,288
TOTAL BUDGET (=B + C)	\$ 72,131	\$ 70,533	\$ (1,598)	\$ 97,348	\$ 25,217
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ -	\$ 1,598	\$ 1,598	\$ -	\$ -
FTEs	0.18	0.29	0.11	0.30	0.12

6. Administrative Services

Administrative Services (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	7.85	10.00	2.15
Total Direct Expenses	\$ 3,239,099	\$ 3,641,164	\$ 402,065
Inc(Dec) in Fixed Assets	\$ 181,435	\$ 84,186	\$ (97,249)
Less: Other Funding Sources			\$ -
Total Allocation to Statutory Programs as Indirect Expenses	\$ 3,420,534	\$ 3,725,350	\$ 304,816
Funding Requirement for Working Capital	\$ (289,699)	\$ (170,612)	\$ 119,087

Methodology for Allocation of Administrative Services Expenses to Programs

All expenses for the Administrative Services Programs, referred to as indirect expenses, are allocated to the delegated program areas based on their respective number of FTEs. This allocation provides improved financial perspective for the delegated functions.

Program Scope and Functional Description

NERC's Administrative Services area includes all business and administrative functions of the organization, including technical committees and member forums, legal and regulatory, human resources, information technology, finance and accounting, and general expenses. Costs incurred for these services are allocated as an indirect expense across NERC's other program areas.

6a. Technical Committees and Member Forums

Technical Committees and Member Forums (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	0.71	1.35	0.64
Total Direct Expenses	\$ 295,946	\$ 577,314	\$ 281,368
Inc(Dec) in Fixed Assets	\$ -	\$ -	\$ -
Working Capital Requirement	\$ -	\$ -	\$ -

Program Scope and Functional Description

MRO staff and Registered Entities participate in various NERC committees, working groups and task forces. This participation provides for Regional Entity staff input as well as Registered Entity input into NERC governance and other activities.

2013 Key Assumptions

This budget item covers all travel costs for MRO staff participation in various NERC committees. When a NERC committee meeting occurs in conjunction with NERC BOT meetings, all costs are budgeted in this account. When a NERC committee meeting occurs as a stand-alone meeting, it is budgeted in the related substantive cost center. This budget also covers MRO's reimbursement of approved stakeholder travel costs for participation in the NERC committees as a MRO representative.

2013 Goals and Key Deliverables

MRO's goal is to actively participate in NERC committees to develop best practices and continuously improve the ERO; to ensure consistency among the Regions; and to meet the goals of the MRO Registered Entities to be highly effective reliability organizations.

Funding Sources and Requirements — Explanation of Increase (Decrease)

By policy, MRO reimburses approved regional stakeholder representatives for travel expenses.

Funding Sources (Other than ERO Assessments)

- In 2013, the expenses related to the indirect program areas are being allocated entirely to the direct programs, and therefore; have no ERO assessment revenue.

Personnel Expenses

- FTEs will be higher in 2013. Based on the 2011 and 2012 trending there is a higher participation of the MRO higher-salaried senior staff rather than lower-salaried junior staff on the NERC Committees, Task Forces, BOT and MRC meetings.

Meeting Expenses

- MRO does reimburse travel expenses for approved regional representatives. The 2013 Budget shows an increase to reflect the general increase in the number of staff and stakeholder participation as well as an anticipated increase in air travel costs.

Operating Expenses

- No operating expenses are budgeted in 2013.

Indirect Expenses

- Indirect program costs are allocated to the direct programs based on FTE count to the direct programs for 2013.

Other Non-Operating Expenses

- N/A

Fixed Asset Additions

- N/A

Technical Committees and Member Forums

Funding sources and related expenses for the Technical Committees and Member Forums section of the 2013 business plan are shown in the table below.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
TECHNICAL COMMITTEES and MEMBER FORUMS					
	2012 Budget	2012 Projection	Variance 2012 Projection v 2012 Budget Over(Under)	2013 Budget	Variance 2013 Budget v 2012 Budget Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ -	\$ -	\$ -	\$ -	\$ -
Penalty Sanctions	-	-	-	-	-
Total NERC Funding	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Membership Dues		-	-	-	-
Testing Fees		-	-	-	-
Services & Software		-	-	-	-
Workshops		-	-	-	-
Interest		-	-	-	-
Miscellaneous		-	-	-	-
Total Funding (A)	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Expenses					
Personnel Expenses					
Salaries	\$ 120,863	\$ 291,192	\$ 170,329	\$ 297,396	\$ 176,533
Payroll Taxes	7,352	16,030	8,678	16,595	9,243
Benefits	8,144	17,351	9,207	18,916	10,772
Retirement Costs	19,587	56,941	37,354	57,407	37,820
Total Personnel Expenses	<u>\$ 155,946</u>	<u>\$ 381,514</u>	<u>\$ 225,568</u>	<u>\$ 390,314</u>	<u>\$ 234,368</u>
Meeting Expenses					
Meetings		\$ -	\$ -	\$ -	\$ -
Travel	140,000	140,000	-	187,000	47,000
Conference Calls		-	-	-	-
Total Meeting Expenses	<u>\$ 140,000</u>	<u>\$ 140,000</u>	<u>\$ -</u>	<u>\$ 187,000</u>	<u>\$ 47,000</u>
Operating Expenses					
Consultants & Contracts		\$ -	\$ -	\$ -	\$ -
Office Rent		-	-	-	-
Office Costs		-	-	-	-
Professional Services		-	-	-	-
Miscellaneous		-	-	-	-
Depreciation		-	-	-	-
Total Operating Expenses	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Total Direct Expenses	<u>\$ 295,946</u>	<u>\$ 521,514</u>	<u>\$ 225,568</u>	<u>\$ 577,314</u>	<u>\$ 281,368</u>
Indirect Expenses	<u>\$ (295,946)</u>	<u>\$ (295,946)</u>	<u>\$ -</u>	<u>\$ (577,314)</u>	<u>\$ (281,368)</u>
Other Non-Operating Expenses	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Total Expenses (B)	<u>\$ -</u>	<u>\$ 225,568</u>	<u>\$ 225,568</u>	<u>\$ -</u>	<u>\$ -</u>
Change in Assets	<u>\$ -</u>	<u>\$ (225,568)</u>	<u>\$ (225,568)</u>	<u>\$ -</u>	<u>\$ -</u>
Fixed Assets					
Depreciation	-	-	-	-	-
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	\$ -	\$ -	-	-	-
Inc(Dec) in Fixed Assets (C)	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
TOTAL BUDGET (=B + C)	<u>\$ -</u>	<u>\$ 225,568</u>	<u>\$ 225,568</u>	<u>\$ -</u>	<u>\$ -</u>
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	<u>\$ -</u>	<u>\$ (225,568)</u>	<u>\$ (225,568)</u>	<u>\$ -</u>	<u>\$ -</u>
FTEs	0.71	1.35	1	1	1

6b. General and Administrative

General and Administrative (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	1.53	1.32	(0.21)
Total Direct Expenses	\$ 532,968	\$ 559,018	\$ 26,050
Inc(Dec) in Fixed Assets	\$ -	\$ -	\$ -
Working Capital Requirement	\$ (289,699)	\$ (170,612)	\$ 119,087

Program Scope and Functional Description

The MRO General and Administrative function provides executive management of the corporation, management of the MRO office, and other administrative support programs.

2013 Key Assumptions

- The current economic downturn will continue into 2013 and adversely affect stakeholder travel budgets and resourcing for work in regional programs.
- MRO will continue the reimbursement of approved stakeholder travel costs for participation in the NERC committees.
- Any increase or decrease in assessments to achieve desired working capital reserve will be included in the General and Administrative area and to be allocated proportionately based on FTE to the direct programs.
- Additional costs of \$100,000 are anticipated for the addition of two independent Board members.

2013 Goals and Key Deliverables

In the General and Administrative function, MRO will assure that there is adequate attention on the day-to-day management of the corporation that includes board governance, policies and procedures to maintain and enhance operation of the corporation, and proper record keeping and related responsibilities under regulations.

Funding Sources and Requirements — Explanation of Increase (Decrease)

The 2013 Budget includes increased travel dollars that reflect the trend of higher travel costs and reimbursement of expenses for the MRO Board of Directors.

Assessments

The Board approved a cash reserve policy to maintain 45 days of cash beginning in 2010 with funding increments of one-third each year, subject to periodic re-evaluation.

As documented in the April 2008 minutes, MRO staff recommended, and the Finance and Audit Committee approved, a cash reserve policy to maintain 45 days of cash. The MRO Board of

Directors approved that the funding of the 45 day cash reserve begin in the 2010 budget with an initial funding amount of one-third of the projected requirements with other funding installments to follow in 2012 and 2013, subject to a re-evaluation of the reserves policy previously adopted by the MRO Finance and Audit Committee.

In March 2010, this policy was re-evaluated by the Finance and Audit Committee who recommended at the March 25, 2010 board meeting that no change be made to the current cash reserve policy.

At the March 29, 2012 board meeting, the Finance and Audit committee's recommendation to apply the 2011 budget under-run to the 2012 revised budget target of \$9,475,504 was approved by the MRO Board of Directors. At the June 28, 2012 board meeting, the Finance and Audit Committee's recommendation to apply the remaining 2011 budget under-run to the 2013 Assessment for G&A was approved by the MRO Board of Directors. The resulting impact on Working Capital reserve will be at the full 45 reserve days, thus meeting the current cash reserve policy in 2013.

Funding Sources (Other than ERO Assessments)

- In 2013, the expenses related to the indirect program areas are being allocated entirely to the direct programs and therefore have no ERO assessment revenue.

Personnel Expenses

- Budgeted FTE remained steady in 2013. However, there was a shift of executive staff giving support in the other programs and an increase in administrative staff support.

Meeting Expenses

- The 2013 Budget meeting dollars increased from 2012 Budget due to the number of meetings at the new facility has increased. Travel dollars have increased in 2013 primarily due to anticipation of higher airline costs.

Operating Expenses

- The 2013 Budget for consultants and contracts reduced costs based on past trends as well as media training costs being moved from General and Administrative to Legal where the MRO Crisis Communication Team will be headed by internal legal sources.
- The 2013 Budget for Professional Services has increased to cover the costs of two independent board members. It is anticipated that these two board members would be included by January 1, 2013. Costs include travel reimbursements.

Indirect Expenses

- Indirect program costs are allocated to the direct programs based on FTE count to the direct programs for 2013.

Other Non-Operating Expenses

- N/A

Fixed Asset Additions

- N/A

General and Administrative

Funding sources and related expenses for the General and Administrative section of the 2013 business plan are shown in the table below.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
GENERAL and ADMINISTRATIVE					
	2012	2012	Variance	2013	Variance
	Budget	Projection	2012 Projection	Budget	2013 Budget
			v 2012 Budget		v 2012 Budget
			Over(Under)		Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ (289,699)	\$ (289,699)	\$ -	\$ (170,612)	\$ 119,087
Penalty Sanctions	-	-	-	-	-
Total NERC Funding	\$ (289,699)	\$ (289,699)	\$ -	\$ (170,612)	\$ 119,087
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Total Funding (A)	\$ (289,699)	\$ (289,699)	\$ -	\$ (170,612)	\$ 119,087
Expenses					
Personnel Expenses					
Salaries	\$ 253,887	\$ 185,824	\$ (68,063)	\$ 192,366	\$ (61,521)
Payroll Taxes	14,231	9,363	(4,868)	10,760	(3,471)
Benefits	17,549	11,976	(5,573)	13,435	(4,114)
Retirement Costs	32,554	32,392	(162)	34,693	2,139
Total Personnel Expenses	\$ 318,221	\$ 239,555	\$ (78,666)	\$ 251,254	\$ (66,967)
Meeting Expenses					
Meetings	\$ 31,554	\$ 31,554	\$ -	\$ 35,864	\$ 4,310
Travel	53,541	53,541	-	60,000	6,459
Conference Calls	800	800	-	800	-
Total Meeting Expenses	\$ 85,895	\$ 85,895	\$ -	\$ 96,664	\$ 10,769
Operating Expenses					
Consultants & Contracts	\$ 60,000	\$ 60,000	\$ -	\$ 40,000	\$ (20,000)
Office Rent	-	-	-	-	-
Office Costs	68,852	68,852	-	71,100	2,248
Professional Services	-	-	-	100,000	100,000
Miscellaneous	-	-	-	-	-
Depreciation	-	-	-	-	-
Total Operating Expenses	\$ 128,852	\$ 128,852	\$ -	\$ 211,100	\$ 82,248
Total Direct Expenses	\$ 532,968	\$ 454,302	\$ (78,666)	\$ 559,018	\$ 26,050
Indirect Expenses	\$ (532,968)	\$ (532,968)	\$ -	\$ (559,018)	\$ (26,050)
Other Non-Operating Expenses	\$ -	\$ -	\$ -	\$ -	\$ -
Total Expenses (B)	\$ -	\$ (78,666)	\$ (78,666)	\$ -	\$ -
Change in Assets	\$ (289,699)	\$ (211,033)	\$ 78,666	\$ (170,612)	\$ 119,087
Fixed Assets					
Depreciation	-	-	-	-	-
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	\$ -	\$ -	-	-	-
Inc(Dec) in Fixed Assets (C)	\$ -	\$ -	\$ -	\$ -	\$ -
TOTAL BUDGET (=B + C)	\$ -	\$ (78,666)	\$ (78,666)	\$ -	\$ -
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ (289,699)	\$ (211,033)	\$ 78,666	\$ (170,612)	\$ 119,087
FTEs	1.53	1.32	(0.21)	1.32	(0.21)

6c. Legal and Regulatory

Legal and Regulatory (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	0.73	1.22	0.49
Total Direct Expenses	\$ 339,971	\$ 344,983	\$ 5,012
Inc(Dec) in Fixed Assets	\$ -	\$ -	\$ -
Working Capital Requirement	\$ -	\$ -	\$ -

Program Scope and Functional Description

MRO maintains 1.22 FTE corporate internal legal counsel to provide advice to the president, Board, and staff on legal and regulatory matters affecting MRO. MRO may use additional specialized legal resources on an as needed basis, for example; tax matters, employee benefit plan issues, and significant policy or FERC matters.

2013 Key Assumptions

- In the 2013 Budget, as in the 2012 and 2011 budgets, there are no specific funds for hearings under CMEP Rules, and MRO would use its current budget and reserves in the first instance.
- MRO reduced its Professional Services budget in 2012 by 43% and will reduce it another 40% in light of the additional internal legal resources.
- Travel costs will increase due to external affairs and communication activities as well as participation in the ERO Legal and Regional Communicators committees.

2013 Goals and Key Deliverables

Legal and Regulatory functions are responsible for general corporate legal advice, legal training, and timely, accurate filings to Regulatory authorities. This function is staff to the MRO Board Governance and Personnel Committee. External affairs and communications are also incorporated into this function and includes outreach to members, various constituencies of the ERO enterprise and regulators (federal, state and provincial).

Media training has been moved from General and Administrative to Legal and Regulatory where the MRO Crisis Communication Team will be headed by internal legal sources.

Outside legal will be used exclusively for any hearings and to supplement internal resources as necessary.

Funding Sources and Requirements — Explanation of Increase (Decrease)***Funding Sources (Other than ERO Assessments)***

- In 2013, the expenses related to the indirect program areas are allocated entirely to the direct programs and therefore have no ERO assessment revenue.

Personnel Expenses

- 2013 Budget has increased by .49 FTE reflecting part-time legal going to 1 FTE. Please refer to Section 4 Account Methodology, Personnel Expenses which explains MRO's 2012 personnel cost fluctuations most notable in the retirement costs.

Meeting Expenses

- For 2013, meeting expenses, which were eliminated in the 2011 budget, remain at zero. Travel costs were increased to reflect both the increase in personnel resources and the continued outreach to state commissions through individual meetings and through the National Association of Regulatory Commissions and NERC trade association meetings.

Operating Expenses

- The 2013 Professional Services account was reduced from 2012 to recognize the additional 0.49 FTE corporate internal legal counsel which will offset in part the need for outside counsel, again showing MRO's trend of using in-sourced "core" responsibilities thereby reducing costs significantly.

Indirect Expenses

- Indirect program costs are allocated to the direct programs based on FTE count to the direct programs for 2013.

Other Non-Operating Expenses

- N/A

Fixed Asset Additions

- N/A

Legal and Regulatory

Funding sources and related expenses for the Legal and Regulatory section of the 2013 business plan are shown in the table below.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
LEGAL and REGULATORY					
	2012	2012	Variance	2013	Variance
	Budget	Projection	2012 Projection	Budget	2013 Budget
			v 2012 Budget		v 2012 Budget
			Over(Under)		Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ -	\$ -	\$ -	\$ -	\$ -
Penalty Sanctions					
Total NERC Funding	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Total Funding (A)	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Expenses					
Personnel Expenses					
Salaries	\$ 196,526	\$ 185,830	\$ (10,696)	\$ 219,355	\$ 22,829
Payroll Taxes	11,569	10,538	(1,031)	11,538	(31)
Benefits	2,638	1,796	(842)	2,150	(488)
Retirement Costs	22,443	33,537	11,094	37,375	14,932
Total Personnel Expenses	<u>\$ 233,176</u>	<u>\$ 231,701</u>	<u>\$ (1,475)</u>	<u>\$ 270,418</u>	<u>\$ 37,242</u>
Meeting Expenses					
Meetings	\$ -	\$ -	\$ -	\$ -	\$ -
Travel	4,200	4,200	-	9,515	5,315
Conference Calls	-	-	-	-	-
Total Meeting Expenses	<u>\$ 4,200</u>	<u>\$ 4,200</u>	<u>\$ -</u>	<u>\$ 9,515</u>	<u>\$ 5,315</u>
Operating Expenses					
Consultants & Contracts	\$ -	\$ -	\$ -	\$ -	\$ -
Office Rent	-	-	-	-	-
Office Costs	2,595	2,595	-	5,050	2,455
Professional Services	100,000	100,000	-	60,000	(40,000)
Miscellaneous	-	-	-	-	-
Depreciation	-	-	-	-	-
Total Operating Expenses	<u>\$ 102,595</u>	<u>\$ 102,595</u>	<u>\$ -</u>	<u>\$ 65,050</u>	<u>\$ (37,545)</u>
Total Direct Expenses	<u>\$ 339,971</u>	<u>\$ 338,496</u>	<u>\$ (1,475)</u>	<u>\$ 344,983</u>	<u>\$ 5,012</u>
Indirect Expenses	<u>\$ (339,971)</u>	<u>\$ (339,971)</u>	<u>\$ -</u>	<u>\$ (344,983)</u>	<u>\$ (5,012)</u>
Other Non-Operating Expenses	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Total Expenses (B)	<u>\$ -</u>	<u>\$ (1,475)</u>	<u>\$ (1,475)</u>	<u>\$ -</u>	<u>\$ -</u>
Change in Assets	<u>\$ -</u>	<u>\$ 1,475</u>	<u>\$ 1,475</u>	<u>\$ -</u>	<u>\$ -</u>
Fixed Assets					
Depreciation	-	-	-	-	-
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets		\$ -		-	
Inc(Dec) in Fixed Assets (C)	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
TOTAL BUDGET (=B + C)	<u>\$ -</u>	<u>\$ (1,475)</u>	<u>\$ (1,475)</u>	<u>\$ -</u>	<u>\$ -</u>
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	<u>\$ -</u>	<u>\$ 1,475</u>	<u>\$ 1,475</u>	<u>\$ -</u>	<u>\$ -</u>
FTEs	0.73	1.22		1.22	0.49

6d. Information Technology

Information Technology (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	2.12	3.10	0.98
Total Direct Expenses	\$ 1,100,652	\$ 1,019,203	\$ (81,449)
Inc(Dec) in Fixed Assets	\$ (29,565)	\$ 34,186	\$ 63,751
Working Capital Requirement	\$ -	\$ -	\$ -

Program Scope and Functional Description

MRO's Information Technology ("IT") program provides the technology and communications tools for staff to perform Regional Entity functions.

2013 Key Assumptions

IT provides support and guidance for the technologies deployed at MRO. Technologies include secure networks, systems and business applications, office equipment such as copiers and faxes, servers to support connected and shared resources, printers, handheld devices, telephony, remote access and conference solutions.

IT provides leadership in using technology effectively and securely. In doing so, users are more productive. The result is a keen focus on availability of networks and systems, maintenance of those systems, investigation of issues, and deployment of new tools.

2013 Goals and Key Deliverables

The IT program's goal is 99.81% uptime on all systems.

Funding Sources and Requirements — Explanation of Increase (Decrease)

Improvements in documentation of processes, automation of repetitive tasks, along with efficiency improvements and staff training are resulting in lower annual IT costs.

Funding Sources (Other than ERO Assessments)

- In 2013, the expenses related to indirect program areas are being allocated entirely to direct programs and therefore have no ERO assessment revenue.

Personnel Expenses

- Personnel costs are increased for an additional .98 FTE in 2013 which are offset in lowering costs in consultants and contracts. Please refer to Section 4 Account Methodology, Personnel Expenses which explains MRO's 2012 personnel cost fluctuations most notably in the retirement costs.

Meeting Expenses

- Travel costs are slightly lower based on recent trends.

Operating Expenses

- 2013 Contracts expense has gone down due to staff training and efforts to perform more upgrades and system maintenance in house.
- 2013 Office costs have gone down as well due to MRO's trend of using in-sourced "core" responsibilities reducing computer supplies and maintenance offsetting the higher costs that would be expected with the higher FTE at MRO.

Indirect Expenses

- Indirect program costs are allocated to the direct programs based on FTE count to the direct programs for 2013.

Other Non-Operating Expenses

- N/A

Fixed Asset Additions

- 2013 Fixed assets related to indirect programs have been allocated proportionately based on FTE to the direct programs. Other efficiencies of the in-sourced "core" responsibilities are reducing the overall cost of fixed asset additions in the 2013 Budget.

Information Technology

Funding sources and related expenses for the Information Technology section of the 2013 business plan are shown in the table below.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
INFORMATION TECHNOLOGY					
	2012	2012	Variance	2013	Variance
	Budget	Projection	2012 Projection	Budget	2013 Budget
			v 2012 Budget		v 2012 Budget
			Over(Under)		Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ -	\$ -	\$ -	\$ -	\$ -
Penalty Sanctions					
Total NERC Funding	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Total Funding (A)	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Expenses					
Personnel Expenses					
Salaries	\$ 178,051	\$ 287,962	\$ 109,911	\$ 291,579	\$ 113,528
Payroll Taxes	14,134	21,517	7,383	22,502	8,368
Benefits	24,316	30,259	5,943	33,318	9,002
Retirement Costs	19,401	41,111	21,710	40,739	21,338
Total Personnel Expenses	<u>\$ 235,902</u>	<u>\$ 380,849</u>	<u>\$ 144,947</u>	<u>\$ 388,138</u>	<u>\$ 152,236</u>
Meeting Expenses					
Meetings	\$ -	\$ -	\$ -	\$ -	\$ -
Travel	5,000	5,000	-	4,000	(1,000)
Conference Calls	-	-	-	-	-
Total Meeting Expenses	<u>\$ 5,000</u>	<u>\$ 5,000</u>	<u>\$ -</u>	<u>\$ 4,000</u>	<u>\$ (1,000)</u>
Operating Expenses					
Consultants & Contracts	\$ 278,500	\$ 278,500	\$ -	\$ 177,500	\$ (101,000)
Office Rent	-	-	-	-	-
Office Costs	201,250	166,250	(35,000)	143,900	(57,350)
Professional Services	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Depreciation	380,000	380,000	-	305,665	(74,335)
Total Operating Expenses	<u>\$ 859,750</u>	<u>\$ 824,750</u>	<u>\$ (35,000)</u>	<u>\$ 627,065</u>	<u>\$ (232,685)</u>
Total Direct Expenses	<u>\$ 1,100,652</u>	<u>\$ 1,210,599</u>	<u>\$ 109,947</u>	<u>\$ 1,019,203</u>	<u>\$ (81,449)</u>
Indirect Expenses	<u>(1,100,652)</u>	<u>(1,100,652)</u>	<u>\$ -</u>	<u>(1,019,203)</u>	<u>\$ 81,449</u>
Other Non-Operating Expenses	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Total Expenses (B)	<u>\$ -</u>	<u>\$ 109,947</u>	<u>\$ 109,947</u>	<u>\$ -</u>	<u>\$ -</u>
Change in Assets	<u>\$ -</u>	<u>\$ (109,947)</u>	<u>\$ (109,947)</u>	<u>\$ -</u>	<u>\$ -</u>
Fixed Assets					
Depreciation	(380,000)	(380,000)	-	(305,665)	74,335
Computer & Software CapEx	350,435	310,435	(40,000)	339,851	(10,584)
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	-	-	-	-	-
Allocation of Fixed Assets	\$ 29,565	\$ 29,565	-	\$ (34,186)	\$ (63,751)
Inc(Dec) in Fixed Assets (C)	<u>\$ -</u>	<u>\$ (40,000)</u>	<u>\$ (40,000)</u>	<u>\$ -</u>	<u>\$ -</u>
TOTAL BUDGET (=B + C)	<u>\$ -</u>	<u>\$ 69,947</u>	<u>\$ 69,947</u>	<u>\$ -</u>	<u>\$ -</u>
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	<u>\$ -</u>	<u>\$ (69,947)</u>	<u>\$ (69,947)</u>	<u>\$ -</u>	<u>\$ -</u>
FTEs	2.12	3.01	0.89	3.10	0.98

6e. Human Resources

Human Resources costs are included in Finance and Accounting.

6f. Human Resources, Finance, and Accounting

Human Resources (in whole dollars)			
	2012 Budget	2013 Budget	Increase (Decrease)
Total FTEs	2.76	3.01	0.25
Total Direct Expenses	\$ 969,562	\$ 1,140,646	\$ 171,084
Inc(Dec) in Fixed Assets	\$ 211,000	\$ 50,000	\$ (161,000)
Working Capital Requirement	\$ 0	\$ -	\$ (0)

Program Scope and Functional Description

Human Resources

The Human Resource function of MRO designs, plans, and implements Human Resource policies and procedures in adherence with applicable federal and state laws.

MRO has developed a culture and talent management program that features an in-depth communication and training plan. The program also facilitates MRO's enterprise-wide corporate compliance and ethics program. MRO has enhanced its support of compliance and ethics through its improved employee screening, enhanced employee on-board training, training and certification of staff, and creating additional opportunities for employee training through meetings and workshops. MRO endeavors to continue to make opportunities for increased understanding of compliance and ethics throughout the organization by taking proactive measure to review and develop policies, continue the training and education of staff, and organize compliance and ethics awareness events. MRO also researches opportunities to add new benefits for the overall employee development of staff, including wellness programs, virtual learning tools, and lessons learned practicums.

Finance and Accounting

The Finance and Accounting function directs the overall financial plans and accounting practices of the organization; oversees treasury, accounting, budget, tax, and audit activities; and oversees financial and accounting system controls and standards.

2013 Goals and Key Deliverables

- Forecasts and projections
- Payroll and expense administration
- Preparation of Quarterly Financial Statements
- IRS Reporting - Form 990
- Review and improve fiscal controls
- Annual Independent Audit initiated by the Regional Entity
- Enterprise-wide Corporate Compliance and Ethics Program

Funding Sources and Requirements — Explanation of Increase (Decrease)

MRO's efforts are not limited to, but include; maintenance of core employee benefits, offsets to non-core benefits when necessary, analysis of office and other operational costs, improving efficiencies, and establishing uniformity in methodologies of cost allocation. MRO staff further explores improved cost effectiveness of routine expenses, and pursues early detection and quick resolution of budget concerns, lessening the impact of cost adjustments. It is our intent to continuously detect and address any risks.

Funding Sources (Other than ERO Assessments)

- In 2013, the expenses related to indirect program areas are being allocated entirely to direct programs and therefore have no ERO assessment revenue.

Personnel Expenses

- Personnel expenses have increased in 2013 reflecting an increase of 0.25 FTEs.
- Please refer to Section 4 Account Methodology, Personnel Expenses which explains MRO's 2012 personnel cost fluctuations most notable in the retirement costs.

Meeting Expenses

- Costs are expected to remain flat and consistent for attending regional budget group meetings.

Operating Expenses

- The 2012 Budget included budgeted Leasehold Improvements, and a related increase in budgeted Office Rent, for 12 months at the new facility. MRO staff moved into its new facility in April 2012. The 2013 budget reflects normalized post move operating costs.
- An increase in Consultant and Contracts costs are due to the cost of recruiting an additional FTE.
- Professional Services expenses remain steady as a result of negotiated service costs.

Indirect Expenses

- Indirect program costs are allocated to the direct programs based on FTE count to the direct programs for 2013.

Other Non-Operating Expenses

- No dollars were necessary in 2013.

Fixed Asset Additions

- 2013 Fixed assets related to indirect programs have been allocated proportionately based on FTE to the direct programs.
- Leasehold Improvements
2012 Budget included the one-time costs related to leasehold improvements in the new facility.

Human Resources, Finance, and Accounting

Funding sources and related expenses for the Human Resources, Accounting, and Finance section of the 2013 business plan are shown in the table below.

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital					
2012 Budget & Projection, and 2013 Budget					
FINANCE and ACCOUNTING					
	2012	2012	Variance	2013	Variance
	Budget	Projection	2012 Projection	Budget	2013 Budget
			v 2012 Budget		v 2012 Budget
			Over(Under)		Over(Under)
Funding					
ERO Funding					
NERC Assessments	\$ -	\$ -	\$ -	\$ -	\$ -
Penalty Sanctions	-	-	-	-	-
Total NERC Funding	\$ -	\$ -	\$ -	\$ -	\$ -
Membership Dues	-	-	-	-	-
Testing Fees	-	-	-	-	-
Services & Software	-	-	-	-	-
Workshops	-	-	-	-	-
Interest	-	-	-	-	-
Miscellaneous	-	-	-	-	-
Total Funding (A)	\$ -	\$ -	\$ -	\$ -	\$ -
Expenses					
Personnel Expenses					
Salaries	\$ 252,503	\$ 288,125	\$ 35,622	\$ 290,826	\$ 38,323
Payroll Taxes	20,061	19,410	(651)	20,485	424
Benefits	25,922	29,251	3,329	32,351	6,429
Retirement Costs	34,235	55,486	21,251	56,737	22,502
Total Personnel Expenses	\$ 332,722	\$ 392,272	\$ 59,551	\$ 400,399	\$ 67,678
Meeting Expenses					
Meetings	\$ -	\$ -	\$ -	\$ -	\$ -
Travel	3,000	3,000	-	3,000	-
Conference Calls	-	-	-	-	-
Total Meeting Expenses	\$ 3,000	\$ 3,000	\$ -	\$ 3,000	\$ -
Operating Expenses					
Consultants & Contracts	\$ 19,576	\$ 19,576	\$ -	\$ 45,500	\$ 25,924
Office Rent	391,680	429,774	38,094	528,827	137,147
Office Costs	66,100	66,100	-	83,920	17,820
Professional Services	79,000	79,000	-	79,000	-
Miscellaneous	-	-	-	-	-
Depreciation	-	-	-	-	-
Total Operating Expenses	\$ 556,356	\$ 594,450	\$ 38,094	\$ 737,247	\$ 180,891
Total Direct Expenses	\$ 892,078	\$ 989,722	\$ 97,645	\$ 1,140,646	\$ 248,569
Indirect Expenses	\$ (969,561)	\$ (969,561)	\$ -	\$ (1,140,646)	\$ (171,085)
Other Non-Operating Expenses	\$ 77,484	\$ 77,484	\$ -	\$ -	\$ (77,484)
Total Expenses (B)	\$ (0)	\$ 97,645	\$ 97,644	\$ -	\$ -
Change in Assets	\$ 0	\$ (97,645)	\$ (97,644)	\$ -	\$ -
Fixed Assets					
Depreciation	-	-	-	-	-
Computer & Software CapEx	-	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-
Equipment CapEx	-	-	-	-	-
Leasehold Improvements	211,000	653,450	-	50,000	(161,000)
Allocation of Fixed Assets	\$ (211,000)	(211,000)	\$ -	(50,000)	161,000
Inc(Dec) in Fixed Assets (C)	\$ -	\$ 442,450	\$ -	\$ -	\$ -
TOTAL BUDGET (=B + C)	\$ -	\$ 540,095	\$ 97,644	\$ -	\$ -
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ -	\$ (540,095)	\$ (97,644)	\$ -	\$ -
FTEs	2.76	3.01		3.01	0.25



Section B – Supplemental Financial Information

2013 Business Plan and Budget

Section B — Supplemental Financial Information

1. Supplemental Financial Information Reserve Balance

Table B-1

Working Capital Reserve Analysis 2012-2013	
STATUTORY	
Beginning Working Capital Reserve (Deficit), December 31, 2011	2,023,133
Plus: 2012 MRO Funding (from LSEs or designees)	8,767,529
Less: 2012 Projected expenses & capital expenditures	(9,475,504)
Projected Working Capital Reserve (Deficit), December 31, 2012	1,315,158
 Desired Working Capital Reserve, December 31, 2013	² 1,144,546
Less: Projected Working Capital Reserve, December 31, 2012	(1,315,158)
Increase(decrease) in assessments to achieve desired Working Capital Reserve	(170,612)
2013 Expenses and Capital Expenditures	9,283,539
Less: Penalty Sanctions ¹	(14,000)
Less: Other Funding Sources	0
Adjustment to achieve desired Working Capital Reserve	(170,612)
2013 MRO Assessment	9,098,927

2. Explanation of Changes in Reserve Policy from Prior Years

The Board approved a cash reserve policy to maintain 45 days of cash beginning in 2010 with funding increments of one-third each year, subject to periodic re-evaluation.

As documented in the April 2008 minutes, MRO staff recommended, and the Finance and Audit Committee approved, a cash reserve policy to maintain 45 days of cash. The MRO Board of Directors approved that the funding of the 45 day cash reserve begin in the 2010 budget with an initial funding amount of one-third of the projected requirements with other funding installments to follow in 2012 and 2013, subject to a re-evaluation of the reserves policy previously adopted by the MRO Finance and Audit Committee.

In March 2010, this policy was re-evaluated by the Finance and Audit Committee who recommended at the March 25, 2010 board meeting that no change be made to the current cash reserve policy. The board directed staff to apply the full 2009 budget underage of \$583,678 to the reserves in 2010, and in 2012 assess the LSE's to the full 45 reserve days, thus reaching the current cash reserve policy in 2012.

At the March 29, 2012 board meeting, the Finance and Audit committee's recommendation to apply the 2010 budget under-run to the 2012 revised budget target of \$9,475,504 was approved by the MRO Board of Directors. At the June 28, 2012 board meeting, the Finance and Audit Committee's recommendation to apply the remaining 2011 budget under-run to the 2013 Assessment for G&A was approved by the MRO Board of Directors. The resulting impact on Working Capital reserve will be at the full 45 reserve days, thus meeting the current cash reserve policy in 2013.

3. Breakdown by Statement of Activity Sections

The following detailed schedules are in support of the Statement of Activities on page 15 of the 2013 RE Business Plan and Budget. All significant variances have been disclosed by program area in the preceding pages.

Penalty Sanctions

Penalty monies received prior to June 30, 2012 are to be used to offset assessments in the 2013 Budget, as documented in the NERC Policy – ACCOUNTING, FINANCIAL STATEMENT AND BUDGETARY TREATMENT OF PENALTIES IMPOSED AND RECEIVED FOR VIOLATIONS OF RELIABILITY STANDARD. Penalty monies received from July 1, 2012 through June 30, 2013 will be used to offset assessments in the 2014 Budget.

All penalties received prior to June 30, 2012 are listed below, including the amount and date received.

Allocation Method: Penalty sanctions received have been allocated to the following statutory programs to reduce assessments: Reliability Standards; Compliance Monitoring & Enforcement and Organization Registration & Certification; Reliability Assessments and Performance Analysis; Training, Education and Operator Certification; and Situation Awareness and Infrastructure Security. Penalty sanctions are allocated based upon the number of FTEs in the Program divided by the aggregate total FTEs in the Programs receiving the allocation.

Table B-2

Penalty Sanctions Received On or Prior to June 30, 2012	Date Received	Amount Received
	7/1/2011	\$ 10,000
	5/2/2012	4,000
Total Penalties Received		<u>\$ 14,000</u>

*Supplemental Funding***Table B-3**

Outside Funding Breakdown By Program (Excluding Penalty Sanction)	Budget 2012	Projection 2012	Budget 2013	Variance 2013 Budget v 2012 Budget
Compliance Monitoring, Enforcement & Org. Registration	\$ -	\$ -	\$ -	\$ -
Total	\$ -	\$ -	\$ -	\$ -
Reliability Assessment and Performance Analysis				
Total	\$ -	\$ -	\$ -	\$ -
Training and Education				
Testing Fees and Certificate Renewals	\$ -	\$ -	\$ -	-
CEH Fees	-	-	-	-
Workshops	-	-	-	-
Total	\$ -	\$ -	\$ -	\$ -
Situation Awareness and Infrastructure Security				
FIST Royalties	\$ -	\$ -	\$ -	\$ -
TSIN Fees				
Total	\$ -	\$ -	\$ -	\$ -
General and Administrative				
Interest Income	\$ -	\$ -	\$ -	\$ -
Total	\$ -	\$ -	\$ -	\$ -
Total Outside Funding	\$ -	\$ -	\$ -	\$ -

Explanation of Significant Variances – 2013 Budget versus 2012 Budget

MRO does not earn interest income. Our general banking account offsets the bank charges with any earned interest.

4. Personnel Expenses

Table B-4

Personnel Expenses	Budget 2012	Projection 2012	Budget 2013	Variance 2013 Budget v 2012 Budget	Variance %
Total Salaries	\$ 4,513,030	\$ 4,406,281	\$ 4,772,320	\$ 259,290	5.7%
Total Payroll Taxes	300,538	282,448	312,394	11,856	3.9%
Total Benefits	412,900	335,991	394,086	(18,814)	-4.6%
Total Retirement	574,473	776,224	833,228	258,755	45.0%
Total Personnel Costs	\$ 5,800,941	\$ 5,800,944	\$ 6,312,028	\$ 511,087	8.8%
FTEs	37.00	35.83	37.75	0.75	2.0%
Cost per FTE					
Salaries	\$ 121,974	\$ 122,977	\$ 126,419	4,445	3.6%
Payroll Taxes	8,123	7,883	8,275	153	1.9%
Benefits	11,159	9,377	10,439	(720)	-6.5%
Retirement	15,526	21,664	22,072	6,546	42.2%
Total Cost per FTE	\$ 156,782	\$ 161,902	\$ 167,206	\$ 10,424	6.6%

Explanation of Significant Variances – 2013 Budget versus 2012 Budget

Please refer to Section 4 Account Methodology, Personnel Expenses which explains MRO's 2012 personnel cost fluctuations most notable in the retirement costs.

5. Consultants and Contracts

Table B-5

Consultants	Budget 2012	Projection 2012	Budget 2013	Variance 2013 Budget v 2012 Budget	Variance %
Consultants					
Reliability Standards	\$ -	\$ -	\$ -	\$ -	
Compliance and Organization Registration and Certification	131,000	131,000	33,000	(98,000)	-75%
Reliability Assessment and Performance Analysis (Secure Portal Dev for Periodic Data Collection)	40,000	40,000	30,000	(10,000)	-25%
Event Analysis	-	-	20,000	20,000	
Training and Education	-	-	-	-	
Situation Awareness and Infrastructure Security	-	-	-	-	
Committee and Member Forums	-	-	-	-	
General and Administrative	60,000	60,000	40,000	(20,000)	-33%
Legal and Regulatory	-	-	-	-	
Information Technology	120,000	120,000	40,000	(80,000)	-67%
Human Resources	-	-	-	-	
Accounting and Finance	5,000	5,000	5,000	-	0
Consultants Total	\$ 356,000	\$ 356,000	\$ 168,000	\$ (188,000)	-53%
Contracts	2012	2012	2013	2013 Budget v	%
Contracts					
Outsource Standards Tracking Software Applications	\$ 12,000	\$ 12,000	\$ 12,000	-	0%
Subtotal - Reliability Standards Contracts	\$ 12,000	\$ 12,000	\$ 12,000	-	0%
Outsource Compliance Information Tracking Applications	-	-	-	-	
Subtotal - Compliance and Organization Registration and Certification Contracts	\$ 171,000	\$ 171,000	\$ 124,000	(47,000)	-27%
	\$ 171,000	\$ 171,000	\$ 124,000	(47,000)	-27%
Model Series Development (MRO's portion of expenses of the MMWG/ERAG)	\$ 24,000	\$ 24,000	\$ 22,600	(1,400)	-6%
Model Building	38,000	38,000	45,800	7,800	21%
PTI Software	22,700	22,700	22,700	-	0%
Subtotal - Reliability Assessments Contracts	\$ 84,700	\$ 84,700	\$ 91,100	6,400	8%
Cisco	20,000	20,000	20,000	-	0%
Barracuda	8,000	8,000	5,000	(3,000)	-38%
Facilities / Security	-	-	-	-	
Lyris	2,000	2,000	-	(2,000)	-100%
DigiCert SSL	-	-	-	-	
Verisign - Domain Renewal	800	800	500	(300)	-38%
Great Plains	8,500	8,500	-	(8,500)	-100%
Globalscape EFT	6,500	6,500	-	(6,500)	-100%
Symantec Antivirus	14,000	14,000	5,000	(9,000)	-64%
Varonis File Maintenance	4,000	4,000	8,000	4,000	100%
Net App Data Storage Maintenance	38,000	38,000	25,000	(13,000)	-34%
Net App Shelves	3,000	3,000	3,000	-	0%
Net App 2050 & 2040	15,000	15,000	-	(15,000)	-100%
VMWare	14,000	14,000	14,000	-	0%
OCS Maintenance	3,000	3,000	-	(3,000)	-100%
Sharepoint Maintenance	17,000	17,000	15,000	(2,000)	-12%
SmartPhone Maintenance	2,000	2,000	6,000	4,000	200%
Server Support	2,700	2,700	5,000	2,300	85%
Great Plains Upgrade	-	-	13,000	13,000	
IT Security Audit	-	-	18,000	18,000	
Subtotal - Information Technology Contracts	\$ 158,500	\$ 158,500	\$ 137,500	\$ (21,000)	-13%
401K / 457b, 457f 3rd Party Administrator	5,000	5,000	4,000	(1,000)	-20%
FSA 3rd Party Administrator	1,200	1,200	1,200	-	0%
Transportation 3rd Party Administrator	-	-	2,800	2,800	
Benefits 3rd Party Administrator	2,376	2,376	2,000	(376)	-16%
CPI-457b 3rd Party Administrator	-	-	-	-	
Payroll 3rd Party Administrator	6,000	6,000	5,500	(500)	-8%
HR-Employment Costs	-	-	25,000	25,000	
Subtotal - HR and Finance Contracts	\$ 14,576	\$ 14,576	\$ 40,500	25,924	178%
Contracts Total	\$ 440,776	\$ 440,776	\$ 405,100	\$ (35,676)	-8%
Total Consulting and Contracts	\$ 796,776	\$ 796,776	\$ 573,100	\$ (223,676)	-28%

Explanation of Significant Variances – 2013 Budget versus 2012 Budget**Consulting Expenses**

- Compliance and Organization Registration consulting expenses are budgeted to decrease in 2013. By using in-sourced “core” responsibilities MRO is reducing consultant and contractor costs significantly.
- Reliability Assessments and Performance Analysis costs includes costs to administer the NERC Alerts and Event Analysis work if necessary.
- Information Technology uses outside consultants for new technology implementation.

Contract Expenses

- Compliance and Organization Registration costs decreased for 2013 due to the webCDMS. Greater efficiencies are budgeted with this third party vendor as additional regions expand the common IT platform increasing efficiency and effectiveness as well as lower costs by spreading costs across the increased number of participating regions.
- Reliability Assessments and Performance Analysis costs slightly increase for 2013 due to higher future costs for renewal or replacement of contracts reaching expiration.
- Information Technology costs decreased due to MRO’s trend of using in-sourced “core” responsibilities reducing third-party contracts.
- Human Resources and Finance costs increased for 2013 due to an increase in hiring costs.

Table B-6

Office Rent	Budget 2012	Projection 2012	Budget 2013	Variance 2013 Budget v 2012 Budget	Variance %
Office Rent	\$ 340,780	\$ 378,874	\$ 513,827	\$ 173,047	50.8%
Utilities	18,300	18,300	5,000	(13,300)	-72.7%
Maintenance	10,000	10,000	10,000	-	0.0%
Office Cleaning	20,000	20,000	-	(20,000)	-100.0%
Waste Management	2,600	2,600	-	(2,600)	-100.0%
Total Office Rent	\$ 391,680	\$ 429,774	\$ 528,827	\$ 137,147	35.02%

Explanation of Significant Variances – 2013 Budget versus 2012 Budget

Office Rent

- The 2013 Budget includes budgeted Leasehold Improvements and associated Office Rent for a new facility. The higher lease costs are partially offset by lower costs for meetings which MRO will be able to hold on-site eliminating meeting room and audiovisual rentals as well as lower catering costs.

Table B-7

Office Costs	Budget 2012	Projection 2012	Budget 2013	Variance 2013 Budget v 2012 Budget	Variance %
Phone Service					
Data Curcuit (qmoe)	\$ 20,000	\$ 20,000	\$ 20,000	\$ -	0.00%
Data Circuit (dsl)	-	-	-	-	
Inbound long distance	8,400	8,400	-	(8,400)	-100.00%
Voice Circuits	12,000	12,000	13,000	1,000	8.33%
Business Cable	3,300	3,300	3,300	-	0.00%
Sunguard 1/	-	-	33,000	33,000	
Internet/Cell	30,656	30,656	44,307	13,651	44.53%
Office Supplies	26,252	26,252	26,350	98	0.37%
Employee Member Events	17,800	17,800	17,800	-	0.00%
Employee Related Expense (Drug Testing, f	8,500	8,500	8,500	-	0.00%
Computer Supplies and Maintenance	57,000	57,000	37,000	(20,000)	-35.09%
Publications & Subscriptions	5,250	5,250	5,400	150	2.86%
Professional Dues	11,583	11,583	13,859	2,276	19.65%
Postage	2,000	2,000	2,700	700	35.00%
Temporary Services	-	-	-	-	
Finance-Filing/Reg Fees	5,000	5,000	6,000	1,000	20.00%
Equipment Repair/Service Contracts 1/	92,350	92,350	25,000	(67,350)	-72.93%
Bank Charges	12,400	12,400	15,500	3,100	25.00%
Sales & Use Taxes	-	-	-	-	
Merchant Card Fees	-	-	-	-	
Presentation & Publicity & Supplies Promot	3,000	3,000	3,000	-	0.00%
Departmental Functional Training	121,228	121,228	108,588	(12,640)	-10.43%
Insurance Expense	35,000	35,000	45,000	10,000	28.57%
Total Office Costs	\$ 471,719	\$ 471,719	\$ 428,304	\$ (43,415)	-9.20%

Explanation of Significant Variances – 2013 Budget versus 2012 Budget

Office Costs

- Computer Supplies and Maintenance and service contracts costs decreased for 2013. By using in-sourced “core” responsibilities, MRO reduced computer supplies and maintenance.

Departmental Functional and Training Costs

- Compliance and Organization Registration costs hold steady for 2013. MRO will work with NERC to use less costly alternatives to in-person attendance for training.

Table B-8

Professional Services	Budget 2012	Projection 2012	Budget 2013	Variance 2013 Budget v 2012 Budget	Variance %
Independent Trustee Fees	\$ -	\$ -	\$ 100,000	\$ 100,000	
Outside Legal	115,000	115,000	67,500	(47,500)	-41.30%
Accounting & Auditing Fees	53,000	53,000	53,000	-	0.00%
Actuarial Fees	26,000	26,000	26,000	-	0.00%
Total Services	\$ 194,000	\$ 194,000	\$ 246,500	\$ 52,500	27.06%

Explanation of Significant Variances – 2013 Budget versus 2012 Budget

- Independent Trustee fees have been added to the 2013 Budget. For 2012, the governance structure of MRO was a balanced stakeholder board whereby no two sectors can control a vote. In 2012, the members of MRO approved revised bylaws to include independent board members. MRO plans to seat the independent board members after the bylaws are approved by applicable regulators. The change in governance is budgeted beginning in 2013.
- Reduced costs for Outside Legal due to increasing internal Legal and Regulatory staff.
- Accounting and Auditing fees were held steady year over year.
- Actuarial fees were held steady in 2013.

Table B-9

Other Non-Operating Expenses	Budget 2012	Projection 2012	Budget 2013	Variance 2013 Budget v 2012 Budget	Variance %
Interest Expense	\$ -	\$ -	\$ -	\$ -	
Line of Credit Payment		-		-	
Office Relocation	77,484	77,484	-	(77,484)	-100.00%
Total Non-Operating Expenses	\$ 77,484	\$ 77,484	\$ -	\$ (77,484)	100.00%

Explanation of Significant Variances – 2013 Budget versus 2012 Budget

The 2012 Budget included a one-time relocation cost relating to budgeted facility move of \$77,484. No dollars were necessary in 2013 Budget.



Section C – Non-Statutory Activities

2013 Business Plan and Budget

Section C — 2012 Non-Statutory Business Plan and Budget

In the 2013 Business Plan and Budget, MRO will not have non-statutory functions.



Section D – Additional Consolidated Financial Statements

2013 Business Plan and Budget

Section D - Additional Financial Statements

1. 2013 Consolidated Statement of Activities by Program, Statutory and Non-Statutory

Section D — Additional Financial Statements

2013 Consolidated Statement of Activities

Statement of Activities and Capital Expenditures by Program 2013 Budget	Total	Statutory Total	Non-Statutory Total	Statutory Activities											Non-Statutory Functions		
				Statutory Total	Reliability Standards (Section 300)	Compliance and Organization Registration and Certification (Section 400 & 500)	Reliability Assessment and Performance Analysis (Section 800)	Training and Education (Section 900)	Situation Awareness and Infrastructure Security (Section 1000)	Committee and Member Forums	General and Administrative	Legal and Regulatory	Information Technology	Human Resources	Accounting and Finance	Non-Statutory Total	
Funding																	
ERO Funding																	
NERC Assessments	9,098,927	9,098,927	-	9,098,927	542,840	6,126,145	2,274,076	229,281	97,197	-	(170,612)	-	-	-	-	-	-
Penalty Sanctions	14,000	14,000	-	14,000	762	9,581	3,370	136	151	-	-	-	-	-	-	-	-
Total NERC Funding	9,112,927	9,112,927	-	9,112,927	543,602	6,135,726	2,277,446	229,418	97,348	-	(170,612)	-	-	-	-	-	-
Membership Dues	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Testing Fees	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Services & Software	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Workshops	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Interest	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Miscellaneous	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Funding (A)	9,112,927	9,112,927	-	9,112,927	543,602	6,135,726	2,277,446	229,418	97,348	-	(170,612)	-	-	-	-	-	-
Expenses																	
Personnel Expenses																	
Salaries	4,772,320	4,772,320	-	4,772,320	210,558	2,372,105	795,326	65,436	37,373	297,396	192,366	219,355	291,579	-	290,826	-	-
Payroll Taxes	312,394	312,394	-	312,394	12,362	159,443	54,654	2,231	1,824	16,595	10,760	11,538	22,502	-	20,485	-	-
Benefits	394,086	394,086	-	394,086	15,154	203,097	71,795	1,935	1,935	18,916	13,435	2,150	33,318	-	32,351	-	-
Retirement Costs	833,228	833,228	-	833,228	32,835	393,579	160,752	11,469	7,642	57,407	34,693	37,375	40,739	-	56,737	-	-
Total Personnel Expenses	6,312,028	6,312,028	-	6,312,028	270,909	3,128,224	1,082,527	81,071	48,774	390,314	251,254	270,418	388,138	-	400,399	-	-
Meeting Expenses																	
Meetings	132,464	132,464	-	132,464	7,500	5,600	20,000	63,500	-	-	35,864	-	-	-	-	-	-
Travel	630,765	630,765	-	630,765	28,900	200,300	106,150	28,600	3,300	187,000	60,000	9,515	4,000	-	3,000	-	-
Conference Calls	41,700	41,700	-	41,700	15,000	8,400	2,500	15,000	-	-	800	-	-	-	-	-	-
Total Meeting Expenses	804,929	804,929	-	804,929	51,400	214,300	128,650	107,100	3,300	187,000	96,664	9,515	4,000	-	3,000	-	-
Operating Expenses																	
Consultants & Contracts	573,100	573,100	-	573,100	12,000	157,000	141,100	-	-	-	40,000	-	177,500	-	45,500	-	-
Office Rent	528,827	528,827	-	528,827	-	-	-	-	-	-	-	-	-	-	528,827	-	-
Office Costs	428,304	428,304	-	428,304	6,580	79,354	28,400	5,000	5,000	71,100	5,050	143,900	-	83,920	-	-	-
Professional Services	246,500	246,500	-	246,500	-	7,500	-	-	-	100,000	60,000	-	-	-	79,000	-	-
Miscellaneous	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Depreciation	305,665	305,665	-	305,665	-	-	-	-	-	-	-	-	-	305,665	-	-	-
Total Operating Expenses	2,082,396	2,082,396	-	2,082,396	18,580	243,854	169,500	5,000	5,000	-	211,100	65,050	627,065	-	737,247	-	-
Total Direct Expenses	9,199,353	9,199,353	-	9,199,353	340,889	3,586,378	1,380,677	193,171	57,074	577,314	559,018	344,983	1,019,203	-	1,140,646	-	-
Indirect Expenses																	
	-	-	-	-	198,132	2,491,737	876,504	35,428	39,364	(577,314)	(559,018)	(344,983)	(1,019,203)	-	(1,140,646)	-	-
Other Non-Operating Expenses																	
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Expenses (B)	9,199,353	9,199,353	-	9,199,353	539,021	6,078,115	2,257,181	228,599	96,438	-	-	-	-	-	-	-	-
Change in Assets																	
	(86,426)	(86,426)	-	(86,426)	4,581	57,611	20,265	819	910	-	(170,612)	-	-	-	-	-	-
Fixed Assets																	
Depreciation	(305,665)	(305,665)	-	(305,665)	-	-	-	-	-	-	-	-	(305,665)	-	-	-	-
Computer & Software CapEx	339,851	339,851	-	339,851	-	-	-	-	-	-	-	-	339,851	-	-	-	-
Furniture & Fixtures CapEx	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Equipment CapEx	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Leasehold Improvements	50,000	50,000	-	50,000	-	-	-	-	-	-	-	-	-	-	50,000	-	-
Allocation of Fixed Assets	-	-	-	-	4,581	57,611	20,265	819	910	-	-	-	(34,186)	-	(50,000)	-	-
Inc(Dec) in Fixed Assets (C)	84,186	84,186	-	84,186	4,581	57,611	20,265	819	910	-	-	-	-	-	-	-	-
TOTAL BUDGET (=B + C)	9,283,539	9,283,539	-	9,283,539	543,602	6,135,726	2,277,446	229,418	97,348	-	-	-	-	-	-	-	-
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	9,197,113	9,197,113	-	(170,612)	(0)	(0)	0	0	(0)	-	(170,612)	-	-	-	-	-	-
FTEs	37.75	37.75	-	37.75	1.51	18.09	6.68	0.27	0.30	1.35	1.32	1.32	3.40	-	3.01	-	-

2. Statement of Financial Position

- As of December 31, 2011, per audit
- As of December 31, 2012, projected
- As of December 31, 2013, as budgeted

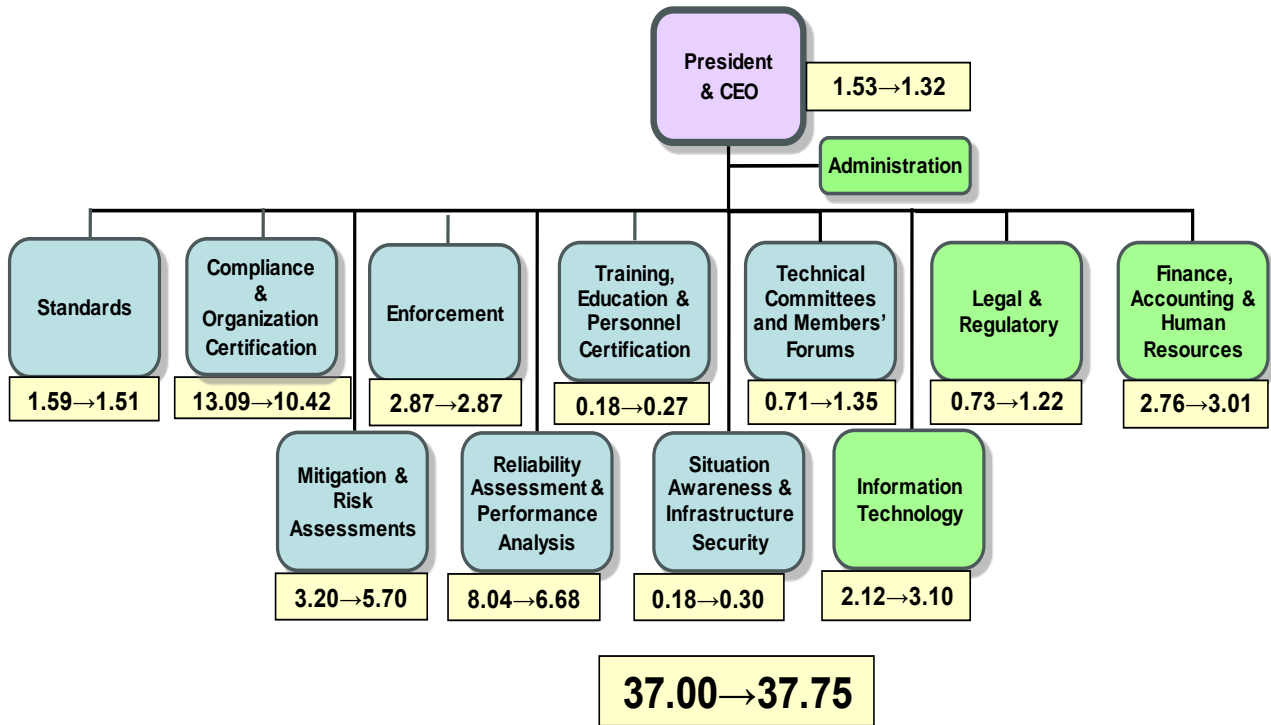
Statement of Financial Position 2011 Audited, 2012 Projection, and 2013 Budget			
STATUTORY			
	(Per Audit) 31-Dec-11	Projected 31-Dec-12	Budget 31-Dec-13
ASSETS			
Cash	3,042,970	1,315,158	1,144,546
Trade Accounts receivable, net of allowance for uncollectible accounts of \$152,323 (2009)	-	-	-
Other Receivables	-	-	-
Prepaid expenses and other current assets	549,444	549,444	549,444
Security deposit	39,858	39,858	39,858
Restricted Cash - non-current	10,000	-	-
Property and equipment and capitalized software	655,154	1,097,604	1,000,000
Total Assets	4,297,426	3,002,064	2,733,848
LIABILITIES AND NET ASSETS			
Liabilities			
Accounts payable and accrued expenses	1,569,281	1,447,478	865,826
Postretirement medical benefit obligation	188,064	288,064	388,064
Deferred assessments - non-current	10,000	-	-
Deferred rent - non-current	-	121,976	300,163
Total Liabilities	1,767,345	1,857,518	1,554,053
Net Assets - unrestricted	2,530,081	1,144,546	1,179,795
Total Liabilities and Net Assets	4,297,426	3,002,064	2,733,848

3. Statement of Activities and Capital Expenditures

Statement of Activities, Fixed Assets Expenditures and Change in Working Capital							
2012 Budget & Projection, and 2013 Budget							
2012 Budget & Projected 2013 and 2014 Budgets							
	2013 Budget	2014 Projection	\$ Change 14 v 13	% Change 14 v 13	2015 Projection	\$ Change 15 v 14	% Change 15 v 14
Funding							
ERO Funding							
NERC Assessments	\$ 9,098,927	\$ 9,569,450	\$ 470,523	5.17%	\$ 9,892,630	\$ 323,180	3.3%
Penalty Sanctions	14,000	-	(14,000)	-100.00%	-	-	
Total NERC Funding	\$ 9,112,927	\$ 9,569,450	\$ 456,523	5.0%	\$ 9,892,630	\$ 323,180	3.3%
Membership Dues	-	-	-	-	-	-	
Testing Fees	-	-	-	-	-	-	
Services & Software	-	-	-	-	-	-	
Workshops	-	-	-	-	-	-	
Interest	-	-	-	-	-	-	
Miscellaneous	-	-	-	-	-	-	
Total Funding (A)	\$ 9,112,927	\$ 9,569,450	\$ 456,523	5.0%	\$ 9,892,630	\$ 323,180	3.4%
Expenses							
Personnel Expenses							
Salaries	\$ 4,772,320	\$ 4,988,213	\$ 215,893	4.5%	\$ 5,187,741	\$ 199,529	4.0%
Payroll Taxes	312,394	324,890	12,496	4.0%	337,885	12,996	4.0%
Benefits	394,086	409,849	15,763	4.0%	426,243	16,394	4.0%
Retirement Costs	833,228	866,557	33,329	4.0%	901,219	34,662	4.0%
Total Personnel Expenses	\$ 6,312,028	\$ 6,589,509	\$ 277,481	4.4%	\$ 6,853,089	\$ 263,580	4.0%
Meeting Expenses							
Meetings	\$ 132,464	\$ 135,113	\$ 2,649	2.0%	\$ 137,816	2,702	2.0%
Travel	630,765	643,380	12,615	2.0%	656,248	12,868	2.0%
Conference Calls	41,700	42,534	834	2.0%	43,385	851	2.0%
Total Meeting Expenses	\$ 804,929	\$ 821,028	\$ 16,099	2.0%	\$ 837,448	\$ 16,421	2.0%
Operating Expenses							
Consultants & Contracts	\$ 573,100	\$ 584,562	11,462	2.0%	\$ 596,253	11,691	2.0%
Office Rent	528,827	539,404	10,577	2.0%	550,192	10,788	2.0%
Office Costs	428,304	436,870	8,566	2.0%	445,607	8,737	2.0%
Professional Services	246,500	251,430	4,930	2.0%	256,459	5,029	2.0%
Miscellaneous	-	-	-	-	-	-	
Depreciation	305,665	311,778	6,113	2.0%	318,014	6,236	2.0%
Total Operating Expenses	\$ 2,082,396	\$ 2,124,044	\$ 41,648	2.0%	\$ 2,166,525	\$ 42,481	2.0%
Total Direct Expenses	\$ 9,199,353	\$ 9,534,581	\$ 335,228	3.6%	\$ 9,857,062	\$ 322,482	3.4%
Indirect Expenses	\$ -	\$ -	\$ -		\$ -	\$ -	
Other Non-Operating Expenses	\$ -	\$ -	\$ -		\$ -	\$ -	
Total Expenses (B)	\$ 9,199,353	\$ 9,534,581	\$ 335,228	3.6%	\$ 9,857,062	\$ 322,482	3.4%
Change in Assets	\$ (86,426)	\$ 34,869	\$ 121,295	-140.3%	\$ 35,568	\$ 698	2.0%
Fixed Assets							
Depreciation	\$ (305,665)	\$ (311,778)	\$ (6,113)	2.0%	\$ (318,014)	\$ (6,236)	2.0%
Computer & Software CapEx	339,851	346,648	6,797	2.0%	353,581	6,933	2.0%
Furniture & Fixtures CapEx	-	-	-	-	-	-	
Equipment CapEx	-	-	-	-	-	-	
Leasehold Improvements	50,000	-	(50,000)	-100.0%	-	-	
Allocation of Fixed Assets							
Inc(Dec) in Fixed Assets (C)	\$ 84,186	\$ 34,870	\$ (49,316)	-58.6%	\$ 35,567	\$ 698	0.0%
TOTAL BUDGET (=B + C)	\$ 9,283,539	\$ 9,569,450	\$ 285,911	3.1%	\$ 9,892,630	\$ 322,482	3.4%
TOTAL CHANGE IN WORKING CAPITAL (=A-B-C)	\$ (170,612)	\$ (0)	\$ 170,612	-100.0%	\$ 0	\$ 1	-238.5%
FTEs	37.75	40.00	2.25		40.00	-	

Attachment A

2012 to 2013 Full Time Equivalent (FTE) Comparison Organization Chart



FTE Trend from 2012 to 2015

2012	2013	2014 Estimate	2015 Estimate
37.0	37.75	40.0	40.0

DOCKET NO. RR12-__-000

**NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION**

2013 BUSINESS PLAN AND BUDGET FILING

ATTACHMENT 4

DISCUSSION OF COMMENTS RECEIVED

DURING DEVELOPMENT OF NERC'S

2013 BUSINESS PLAN AND BUDGET

ATTACHMENT 12

DISCUSSION OF COMMENTS RECEIVED DURING DEVELOPMENT OF NERC'S 2013 BUSINESS PLAN AND BUDGET

During the preparation of its 2013 Business Plan and Budget, NERC posted a total of three drafts (Draft #1, Draft #2 and the Final Draft) on its Website for stakeholder comment. In addition, the NERC Board of Trustees invited stakeholders to provide policy input on the 2013 Business Plan and Budget. The Edison Electric Institute (EEI) submitted comments on Drafts #1 and 2, and the Ontario Independent Electricity System Operator (IESO) submitted comments on Draft #2. Comments on NERC's 2013 Business Plan and Budget were also provided in response to the Board's request for policy input in connection with its August 16, 2012 meeting. Comments in response to the request for policy input were submitted by the Electricity Consumers Resource Council (ELCON), the Electric Power Supply Association (EPSA), the Federal/Provincial Utilities Sector (Sector 4) of the NERC Member Representatives Committee (MRC), Midwest Reliability Organization (MRO), Northeast Power Coordinating Council (NPCC), the National Rural Electric Cooperative Association (NRECA), SERC Reliability Corporation (SERC), the State and Municipal and Transmission-Dependent Utilities Sectors of the NERC MRC (SM-TDU Sectors¹), and EEI.

The remainder of this Attachment summarizes the stakeholder comments on Drafts #1 and #2 and the stakeholder submissions in response to the Board's request for policy input, as well as NERC's responses thereto.

Response to Comments on Draft #1 of NERC 2013 Business Plan and Budget

EEI Comments

EEI has consistently raised the following themes over the past four years in its comments to NERC with regard to budgets and business plans:

NERC should be applauded for standing up the Electric Reliability Organization and its organizational framework. The deadlines set by FERC for implementing Section 215 were extremely aggressive. The volume and pace of work was extremely challenging, nevertheless, deadlines were met and the work was performed. The speed of this work and the rapid growth required to support this work defined many of the challenges NERC faces today.

In light of this development history, EEI has consistently recommended that NERC focus its management attention and resources on the core program areas: standards development, and compliance and enforcement. Success in the core program areas is vital to NERC's long-term success. While seeking to engage a

¹ The American Public Power Council, the Large Public Power Council, and the Transmission Access Policy Study Group submitted a separate letter stating that they concurred with the response submitted by the SM-TDU Sectors.

more diverse set of interesting activities, it is critically important to not distract limited NERC and Industry resources from the core mission. When the core program areas have matured, NERC will be ready to consider new areas of work within the scope of Section 215 and should have the management discipline upon which to build other sustainable program areas. Companies set limits on the scope of their work efforts to ensure that the commitments can be successfully produced and because there are practical limits for their expertise and resources, and NERC should do the same.

The compliance and enforcement program area has been significantly challenged from the outset. First, by an immediate and large backlog, second, by an apparent policy that all violations must be processed under an administratively bureaucratic one-size-fits-all enforcement tool, and third, by the development of varying approaches to compliance and enforcement by the regions. Companies strongly believe that the costs to NERC and the regions, and to companies, to process documentation and paperwork far outweigh any potential benefit to system reliability. Companies also are very frustrated by the ever-growing need to distract limited pools of highly specialized expertise to the processing of unnecessary compliance-related paperwork. It is urgent that NERC return a realistic balance in the management of this program area.

The NERC Critical Infrastructure Program (CIP) needs strong management and a strategic focus. EEI and its member companies sometimes have been confused by what NERC is doing, the goals and objectives of various activities, when and where activities are taking place, and how to engage or support them. NERC CIP activities need to be coordinated with other industry work.

Specifically, NERC as the ES-ISAC has been an object of concern for four reasons. First, the ISAC structure is the product of a series of Presidential Directives that were issued prior to September 11, 2001, and which apply only in the United States. Second, most electricity delivery takes place at the local distribution level, which is not the expertise or focus of NERC, and is subject to the regulatory jurisdiction of the states. Third, even considering the policy statement adopted by the NERC Board in February 2012, companies remain concerned over conducting sensitive or confidential discussions on any issue within the same organization that has legal responsibilities to conduct compliance and enforcement. Fourth, other industry sector ISAC activities have matured as self-funded standalone structures with strong relationships with the government. We believe our reasoning does not suggest a criticism of NERC performance but instead a strong sense that the ISAC function needs a high level discussion to ensure that the function is appropriately supported and positioned within the industry.

EEI Comments specific to the proposed 2013 NERC budget and business plan:

We offer brief observations. In EEI comments on the 2012 budget we asked that NERC apply greater transparency and appreciate that in the 2013 budget NERC has applied many of our suggestions. In the proposed 2013 budget we find more details and greater specificity over what had been previously provided. For example, we note that efforts were made to provide greater clarity and more details in the area of contracts and consultants. We also appreciate efforts to better explain significant deviations from approved budgets and projected spending for the current year to add to greater budget transparency. A suggestion, that NERC consider adding information on the previous year's budget, including year-end totals as another piece of information that would help stakeholders assess ERO performance.

EEI is encouraged that NERC plans to include three-year projections in the second budget package planned for early June. All companies' strategic planning examines longer term spending plans in order to support management decision making, support analyses of directional matters, and evaluate program success and we are pleased NERC will conform to this standard planning approach. We believe this is reflective of a maturing organization noting that NERC has grown to a level where management and the Board of Trustees, and stakeholders, have a clearer sense of longer term budget issues.

Another area where we believe additional work should be considered is in the development of measurable goals and priorities. With the exception of the Reliability Assessment and Performance Analysis group, the current list of priorities and goals will be very challenging to measure performance against stated goals for the year. EEI finds most of the work descriptions to be vaguely defined. EEI believes that more specificity would enable NERC to develop performance metrics which could be used to better communicate performance to stakeholders, the Board of Trustees, and to FERC. Stakeholders are particularly concerned that NERC has not sufficiently developed measurable goals and priorities for standards development in the context of staffing and technological upgrades. Although the Standards Committee along with NERC has developed goals and priorities for standards development, there seems to be a constraint based on NERC staffing levels and technology that holds back the processing of interpretations, standards and the related filings at FERC, as well as the quality of information provided on the NERC website. EEI suggests that NERC consider that over the next three to five years there are a large number of standards projects, interpretations and the like that will need support, in the form of short-term contactors or longer term permanent staff, as well as upgrades to its internet site. It may also be wise to consider the staffing and technology issues in light of the recent decision to revise the Standards Development Process, and whether the new process will require additional NERC resources and technology.

EEI continues to believe that the Situation Awareness program area needs much better strategic definition and clear boundaries. In NERC's 2012 budget it was stated that NERC would, as a "Key Deliverable," work with the Industry to

develop a long term strategy for SAFNR. Presently this program lacks sufficient transparency for stakeholders to judge whether NERC has made noticeable efforts to develop or possibly refine the long term strategy for this program. We are concerned that there is no indication that the Industry has been engaged as promised. We further note that NERC plans to maintain the funding level for this program on par with 2012 levels with the only notable change being the termination of the IDC support contract which is a cost which is simply being shifted out of NERC to IDC users.

EI recommends that NERC not provide resources for the human performance activity. While this appears to be small in terms of the overall budget, we believe this provides a clear example of NERC continuing to add various tasks and initiatives that potentially distract both NERC management and stakeholders from attending to the core program areas. As we have asked for several years, NERC should hold to a sustained emphasis on standards development, and compliance and enforcement, and avoid adding yet another new set of activities that will require time and attention of company personnel to monitor and manage.

Stakeholders have not seen a plan for the goals and objectives of this new activity, making measurements of success difficult to perform. It is also very difficult to understand what NERC plans to accomplish with one FTE, who we might imagine will conduct webinars and participate in various committee meetings. To the extent 'human performance' needs explicit attention, we recommend that a good start might be to consider including consideration of human error issues in existing training and certification programs.

NERC should not take this as a suggestion that consideration of 'human performance' – related activity is unimportant or should not be pursued. Human error is a significant challenge and a contributor to various system disturbances and events. To the extent explicit work is envisioned, we believe that this kind of activity is much better suited to the scope and mission of the North American Transmission Forum. In NERC decides to retain the activity, stakeholders deserve to participate in the development of a clearly stated plan with measurable goals and objectives.

NERC Response to EI Comments

NERC revised and updated its final 2013 Business Plan and Budget to:

- further clarify corporate and departmental priorities and the relationship between proposed activities and Section 215;
- describe efforts that are being made and will continue to be made to improve compliance enforcement efforts and reduce compliance burdens on registered entities;

- describe the coordination between Critical Infrastructure Protection activities and industry work; and
- further describe ongoing efforts to educate industry regarding the ES-ISAC and build industry support.

Additionally, at the August 16, 2012 NERC Board meeting, presentations were also made before stakeholders, including representatives of EEI, regarding the status of the ES-ISAC, as well as NERC's engagement with and support of other industry CIP and cyber initiatives. These presentations were publicly posted as part of the meeting agenda materials.²

With respect to EEI's comments regarding information related to the previous year's budget, NERC files annual budget-to-actual cost true-up reports with the Commission which are publicly available.³ NERC also publicly posts, and reviews in public meetings of the Board Finance and Audit Committee, quarterly budgeted-to-actual financial information, as well as provide rolling quarterly year-end budget projections.

With respect to EEI's comments regarding measurable goals and priorities, NERC prepares, posts and publicly reviews annual corporate and departmental goals and objectives, as well as quarterly performance in achieving the goals and objectives, in open sessions before the NERC Board, the Board's Corporate Governance and Human Resources Committee, and stakeholders, including representatives of EEI. These goals and objectives include specific goals and objectives for the Reliability Standards department. See pages 13-14, 17-19, and 37 of the final 2013 NERC Business Plan and Budget, **Attachment 2** to this filing.

NERC addressed EEI's comments regarding extensive industry engagement in the Situation Awareness Program in the Final Draft of the 2013 Business Plan and Budget. Costs of operations reflect the software licensing, operation and maintenance costs to support industry participation and use of SAFNR, as well as communication networks used by Reliability Coordinators.

NERC clarified the scope and extent of its Human Performance activities in both Draft #2 and the final Draft of its 2013 Business plan and Budget.⁴

Response to Comments on Draft #2 of the NERC 2013 Business Plan and Budget

IESO Comments

The IESO commends NERC staff for the translation of strategic direction into program priorities and associated resources. In addition, the 2013 Budget is both informative and clear. The following suggested improvements are to be viewed within this context.

² http://www.nerc.com/filez/bot_agenda_items.html.

³ The true-up report for 2011 was filed with the Commission on May 30, 2012 in in Docket No. RR12-11-000.

⁴ See the final NERC 2013 Business Plan and Budget, **Attachment 2** at 63 and 71-72.

The target level of working capital and operating reserve, \$4.8M, is excessive and should be reduced by \$3.1M to a level of \$1.7M.

NERC is to be commended for the detailed rationale provided on pages 125-127 for the target working capital and operating reserve (WCOR). However, certain of the components of the WCOR are excessive and should be reduced:

- Draft 2 states (page 125) that NERC expects to be able to meet the terms of its credit agreement without additional reserves, but recommends an additional \$700k to avoid drawing on its \$4M line of credit in the event this expectation is not met. The IESO proposes that NERC rely on its line of credit for this eventuality, and not add the \$700k to the WCOR. This accords with our understanding of the purpose of the line of credit, i.e., as a backstop in the event unanticipated circumstances occur. As noted, NERC does not anticipate shortfalls in meeting the terms of its credit agreement.
- Draft 2 recommends the addition of \$1M for unforeseen contingencies. This would be in addition to provision made for seven known contingencies. No rationale is provided for the \$1M addition. In the absence of specific evidence, such as the emergence of contingencies that arose in past years and were not capable of being identified at the time the budget for that year was established, the IESO proposes that no provision be made for unforeseen contingencies in the 2013 funding requirement. Again, the \$4M line of credit is the appropriate mechanism to address such an unlikely contingency, in the event it arises.
- Draft 2 recommends the addition to the 2013 WCOR of \$1.75M for the Personnel Certification and Operator Training Program.
 - Of this additional 2013 funding requirement, \$1.4M would retroactively recognize excesses in fees revenues over costs realized in previous years. The IESO submits that if a policy to apply fees revenues in excess of program expenses in one year to program expenses in future years is adopted, it should not be applied retroactively - if the policy is adopted in 2012, any excesses incurred before 2012 should not be applied to the program in 2013 and beyond. The appropriate start date for applying the new policy is the date on which it receives approval.
 - The expected excess in 2012 is \$350k, which would be applied to 2013 and beyond. We can understand and accept the concept inherent in the proposed policy, namely to segregate the contribution to WCOR from training fees from other components of the WCOR, with the excess fee component trued up each year. This approach ensures that all training fees paid will eventually be applied to the intended program area, i.e., training. We would, however, be concerned with budgeting that was intentionally skewed in a direction that would intentionally provide for needed expenses through the “back door”, i.e., WCOR. If it is determined that a program is needed, the program should be included in the budget, using unbiased estimates of

expenses and fees. Stated differently, needed programs should not be conditional on the existence of positive budget variances. We note that the expected variance in 2012 is large for an established program, with \$350k corresponding to 17% of fees.

It is noted that with the \$3.1M reduction in WCOR recommended by the IESO (0.7M + \$1M + \$1.4M) the resulting \$1.7M target level of WCOR for 2013 is comparable to the level of \$1,798,578 approved by the NERC Board for year-end 2012 in last year's budget (Table B-1, page 89). [Footnote omitted.]

It may be instructive to consider the insights on the history of NERC's WCOR provided last year in NERC's budget for 2012 (at page 70):

- In its 2010 budget, NERC only provided sufficient funding for working capital reserve to restore its cash working capital reserve to zero at December 31, 2010. This was done in order to mitigate the overall funding increase over 2009.
- In its 2011 budget, NERC believed it was prudent to re-establish this reserve in light of the growth in the size of the organization, its cash flow requirements and the potential for unanticipated short-term resource needs driven by potential governmental directives, industry needs or litigation that could potentially arise in connection with enforcement actions. NERC's 2011 budget included \$5M in working capital reserve funding, a significant portion of which was required to strengthen NERC's balance sheet due to the impact of accrual accounting adjustments on its 2009 year-end working capital balance.
- In its 2012 budget, NERC projected a 2011 year-end working capital balance of \$1,198,578 at the time of finalizing the budget. It was noted that NERC had in place a \$4M line of credit, which could be used to fund unforeseen expenses or revenue shortfalls. In addition, NERC's free cash flow in 2012 would be enhanced by the amortization of the leasehold for the Atlanta office. Based on these three factors, NERC accepted the then projected year-end 2011 WC reserve level of \$1,198,578 as an appropriate level for year-end 2012.

As noted below, the IESO believes the WCOR level should be planned for on its own merit. It should be kept as low as possible, to minimize NERC's allocations, subject to being adequate to provide for uncertain and unexpected expenses or revenue shortfalls.

The appropriate level of WCOR should be addressed explicitly on its own merits in drafts of the Budget, and should not be, as at present, a derived quantity that is subject to changing current year budget variances.

The target level of NERC WCOR, for example at year end 2013, is an appropriate topic for stakeholder input. As discussed, we commend NERC for addressing the target level explicitly and in detail in Draft2.

However, from a numerical perspective, the first two drafts of the 2013 Budget are similar to those in past year's, where it is stated in Draft 1 that a particular change to the WCOR is appropriate, a decrease of \$250K in this year's Budget, and this change is maintained throughout the budget development. As a consequence, the amount that should be of primary interest, namely the absolute magnitude of the year-end WCOR for the budget year, becomes a derived quantity. As a result, the year-end level of WCOR for the budget year is a moving target, determined by the changes to the projected year-end level for the current year.

We note that NPCC uses the recommended approach of deriving its funding requirement directly from a target level of WCOR. [Footnote omitted.]

Draft 2 (Table B-1, page 103) has a Dec. 31, 2013 WCOR of \$4,565,696. This value should be \$4.8M to be consistent with the discussion on pages 125-127 (and \$1.7M in the IESO's view, as described above). In any event, the final version of the 2013 Budget should be consistent in the target level of WCOR appearing in the discussion and the level in Table B-1.

The final version of the 2013 Budget should provide brief guidance on how the various categories interrelate within the various tables titled "Statement of Activities, Fixed Assets Expenditures and changes in Working Capital, 2012 Budget & Projection and 2013 Budget"

The accuracy of the numbers in these tables is not in question. The tables summarize all of the major expense components, balance sheet changes (changes in Fixed Assets and WC), and the components of funding. They are the backbone of the financial detail in the 2013 Budget, and hence their clarity is a matter of importance

What is unlikely to be apparent to the non-expert reader is the flow by which these components are determined. For example, from a review of these tables, one might reasonably surmise that the total Funding Requirement is derived by adding the NERC Assessments to Penalty Sanctions and the various categories of fees; whereas, the steps in NERC's planning takes a different order. That is, expenses (direct, operating, non-operating) are determined directly; these are added to changes in Assets (fixed and WC), which are likewise determined directly; to yield the total Funding Requirement; from which Penalty Sanctions and Fees are deducted to yield NERC Assessments.

Adding brief guidance to this effect in the text accompanying the first table, perhaps as a footnote, would enhance stakeholder understanding of these important tables.

Clarification is sought in the application of funds from penalties

Two years ago, for NERC's 2011 Budget, all penalty monies collected under NERC's authority were applied to the NERC funding requirement for US entities, i.e., none were applied to the Regional Entity funding requirements. Last year, for the 2012 NERC Budget, all penalty monies were applied to Regional Entities for US entities, none to NERC. This year monies are applied both to NERC and the Regional Entities.

The explanation for these year-to-year differences in practice is not apparent - brief clarification in the final version of the 2013 Budget would be helpful.

NERC Response to IESO Comments

As further described in the final Draft of NERC's 2013 Business Plan and Budget, NERC eliminated funding for working capital (*i.e.*, 2013 Working Capital Reserve is \$0) and further reduced its operating reserves for Known Contingencies and Unforeseen Contingencies, to \$1.0 million for each account. The \$1.0 million operating reserve for known contingencies for which timing and amount are uncertain encompasses specific known contingency items with an aggregate estimated maximum cost impact of \$2.5 million. Additionally, NERC believes that its bank line of credit should be used to manage short-term cash fluctuations (which is one reason why the 2013 Working Capital Reserve was set at \$0) and should not be earmarked for unforeseen contingencies. Finally, fees that have been generated from the operator certification and training program in excess of program costs are designated to be used only to support that program, as established in the Working Capital and Operating Reserves Policy. NERC notes that it is not adding an amount to Working Capital and Operating Reserves for the operator certification program; rather, the amount is already in NERC's Working Capital Reserves as a result of fees collected in the operator certification and continuing education program in the current and prior years being in excess of program costs. (Testing and other fees for the program are set by the PCGC to cover the projected costs of the program, but over time, either actual fee revenue has been higher than projected due to increased activity, or program costs have been lower than projected.) What NERC's new Working Capital and Operating Reserves Policy does is recognize that this component of the overall Working Capital and Operator Reserves Balance has been generated from the operator certification and continuing education program and therefore should be identified as being generated from that program and used only for the needs of that program. As stated in the final NERC 2013 Business Plan and Budget, for 2013, a portion of the existing Operating Reserve balance that has been generated by the operator certification and continuing education program will be used to pay for costs of upgrading the System Operator Certification and Continuing Education Database and a portion will be used to charge lower fees than would otherwise be set to cover projected 2013 program costs.

Finally with respect to IESO's comments on Working Capital, NERC does establish a target amount of Working Capital Reserves each year (and, beginning with 2013, pursuant to its new Working Capital and Operating Reserves Policy, will set a target level of Working Capital and Operating Reserves for each of five categories). The target level of reserves is then compared to the projected levels of reserves at December 31 of the current year and the budget year, and an adjustment (increase or decrease) is made to the initially-calculated assessment amount for the

budget year so that the target level of reserves is achieved at December 31 of the budget year. For 2013 and future years, this process will be carried out for the individual components of Working Capital and Operating Reserves. This process is explained and displayed in Exhibit C and Table B-1 of the final NERC 2013 Business Plan and Budget.

With respect to IESO's comment that further clarification should be provided concerning how the total Funding and the proposed Assessment levels are determined based on the Statements of Activities, Fixed Asset Expenditures, and Changes in Working Capital (Statement of Activities), the Statement of Activities in essentially its current format has been used in the NERC and Regional Entity annual business plans and budgets for a number of years, and NERC believes that both the format and the way the Funding requirement and proposed assessment amounts are developed from the proposed budget are well understood by stakeholders. In fact, IESO's comment on this point demonstrates that its authors understand how the Funding requirement and proposed assessment amounts are developed.

With respect to IESO's comments concerning the application of funds from Penalties, NERC believes it is clear that Penalties assessed to and collected from registered entities by NERC during the 12 months ended June 30 of the preceding year are used to reduce NERC's assessments, while Penalties assessed to and collected from registered entities by a Regional Entity during that time period are used to reduce that Regional Entity's assessments. For its 2012 Budget, NERC had no Penalty collections during the 12 months ended June 30, 2011, and therefore no Penalty offsets to its assessments for 2012. NERC also notes that Penalties collected by NERC or a Regional Entity from a U.S. registered entity pursuant to Section 215 of the Federal Power Act are used solely to offset assessments to U.S. load-serving entities.

NERC's believes the IESO's other comments have been adequately addressed in the final version of NERC's 2013 Business Plan and Budget.

EEI Comments

EEI continues to offer a consistent message over the past four years in its comments to NERC concerning its budget and business plan. EEI supports NERC and remains convinced that NERC is working diligently to be responsive and responsible as the Industry's ERO. We applaud NERC for its many accomplishments, as noted in our previous comments dated May 24, 2012. Nevertheless, we believe that NERC would benefit from greater focus on its core program areas: standards development, and compliance and enforcement. We believe that NERC's success in these core program areas is vital to their long-term success. While recognizing that there may be many worthy reliability activities, we continue to advocate how important it is to not divert limited NERC and Industry resources from the core mission.

In sum, we believe NERC needs to identify priorities, and identify those priority non-215 activities that are better handled by industry organizations other than NERC. We look forward to reviewing NERC's plans and priorities as they are identified in the next budget draft.

NERC Response to EEI Comments

NERC's final 2013 Business Plan and Budget sets forth corporate and departmental priorities, including the relationship between NERC's activities and Section 215. The final business plan and budget also reflects the elimination or deferral of certain activities in or beyond 2013, and clarifies NERC's supporting, as opposed to leading, role with respect to a number of industry and governmental reliability initiatives. *See* for example pages 56, 63, 72, 75 and 76 of the final NERC 2013 Business Plan and Budget, **Attachment 2** to this filing.

Responses to Stakeholder Responses to the NERC Board's Request for Policy Input

ELCON

Large customers have not had the time to review in detail the NERC and Regional Entity Common Business Plan and Budget, but continue to be concerned about overall costs. Large Customers, unlike regulated utilities, cannot pass along the costs.

NERC Response

NERC remains committed to achieving further efficiencies and cost effectiveness in its operations as well as the overall operations of the ERO. NERC is also committed to reducing unnecessary compliance burdens on industry.

EPSA

Competitive suppliers believe that others more impacted by the NERC budget can best comment on specifics associated with the budget. However, much as EPSA asserted in association with the compliance improvement initiative [footnote omitted] there are budget implications that the ERO must consider and are important to furthering the ERO's success.

EPSA appreciates the ERO and the BOT for supporting and acting on the compliance improvement initiative as it is a critical process improvement that increases organizational efficiency, allowing for more emphasis on reliability. While the initiative is a positive step that should support future efforts including Phase II of the compliance improvement initiative to build on initial successes. Building on the initiative in Phase II is integral to increasing the efficiency of the budget. Because the compliance resource commitment makes up half of the NERC budget, initiatives that will bring compliance spending more in balance with the other five ERO goal areas is the right approach. Measurement and evaluation of the compliance initiative for continued improvement and detailing the plan for implementation of Phase II will inform decisions to build on successes and improve the program. EPSA believes that ensuring consistent coordination of this program will be the cornerstone of its success. EPSA encourages the ERO to continue to provide and stress training for compliance

program area personnel. This should be considered a priority area for resource commitment.

NERC Response

NERC and the Regional Entities will continue build on the Find, Fix, Track and Report (FFT) and Spreadsheet Notice of Penalty initiatives and are also committed to ensuring the proper training and qualifications of NERC and Regional Entity compliance personnel, including auditors. In addition to the efforts in the enforcement processing area, NERC and the Regional Entities are continuing work to transform compliance monitoring; encouraging registered entities to develop effect internal and reliability risk controls; and ensuring that compliance results are achieved efficiently to avoid undue burden and cost on registered entities.

MRC Sector 4 – Federal/Provincial Utilities

Sector 4 and other entities throughout North America are under huge pressures to contain costs and minimize rate impacts in light of their customer challenges. This industry is facing cost pressures due to economic conditions, transition to renewable energy resources, green technology, smart grid and the need to replace aging infra-structure. In addition, compliance obligations are increasing and the new BES definition will have huge impacts for many entities. We suggest that NERC and Regions further conduct sensitivity analysis of 5-10-15% budget reduction and manage Business Planning process to ensure that costs are contained by means of specific productivity gains. We believe that this can be achieved by properly defining the core NERC accountabilities (standards development, compliance enforcement, etc.) and excluding and constraining its other activities that may or should not be within NERC's scope of work.

We believe that once core accountabilities are established, prioritization of NERC activities should be undertaken along with identification of shared responsibilities for reliability solutions among NERC, industry (such as NATF, EEI but not limited to) and other partnerships can be achieved.

NERC Response

NERC will be initiating a process to obtain additional stakeholder feedback regarding goals and priorities for the next three year planning cycle, including but not limited to opportunities for increased involvement and participation by trade associations, industry forums and other stakeholders.

MRO

MRO generally supports the 2013 NERC and Regional Entity Common Business Plan and Budget. MRO offers the following comments:

Overall, it appears the NERC budget is better aligned with the key priority programs: Reliability Standards, Compliance and Enforcement (CMEP administration), Assessments, and Event Analysis. Based on the figures in the 2013 Business Plan and Budget, these program areas account for about 69% of NERC's budget in 2013, compared with 66% in 2012. To capitalize on this trend, MRO suggests that NERC review these program areas to assure that the dollars are being properly allocated. For example, in the compliance and enforcement area, the priority areas for NERC should be training, standardization of procedures and systems, and oversight tools to promote more uniformity and assure adequate rigor across NERC and the Regional Entities. NERC and the Regional Entities should continue to work together to drive better consistency through uniform practices. Additionally, throughout the remainder of 2012 and during 2013, NERC and the Regions should continue the efforts initiated by NERC with the Find, Fix, Track and Report (FFT) process. MRO believes the next step in the evolution of the CMEP must incorporate risk-based principles grounded in sound assurance practices to document minor, immaterial matters, preventing them from being subject to the enforcement process. Based on the figures in the 2013 Business Plan and Budget, the budget for the Situation Awareness area has decreased from 12% of the total budget in 2012 to 9% of the total budget in 2013. MRO believes there is an opportunity for greater efficiency and clarity in this area as the new SAFNR platform and other tools are deployed across the Regional Entities. More discussion about this program area will be helpful in clarifying the roles and responsibilities of NERC and the Regional Entities as compared with Reliability Coordinators.

Finally, MRO supports the separation of Event Analysis from Compliance Investigations. These are two distinct functions with distinctly different outcomes. Event Analysis is stakeholder driven and should result in Recommendation and Lessons Learned for the industry. Conversely, Compliance Investigations are enforcement-driven and have the potential, and possibly even the presumption, that violations of standards will be identified. Therefore, MRO supports a "bright-line" between the Event Analysis and Compliance Investigation functions in the organization.

MRO would like to emphasize that its budget, as with the other Regional Entity budgets, is fully vetted through the governance structure, and therefore; we appreciate the great deference given to these budgets when considering approval at NERC. We appreciate NERC's continued support for the Regional Entity budget development process.

NERC Response

NERC reviews resource allocation each year as part of its business planning and budgeting process. NERC will continue to perform this review to ensure the proper balance in the resources which are allocated to achieving the ERO's goals and objectives during the next planning cycle, which will be jointly developed by NERC and the Regional Entities through an open process

which, as noted in the preceding response, provides opportunities for stakeholder input.

NPCC

NPCC believes that the scope of the NERC Business Plan appropriately includes necessary reliability assurance activities in the areas of standards development, compliance, reliability assessment, situation awareness, events analysis, training and cyber security.

NPCC supports NERC's focusing on its highest priority goals of improving reliability standards and enhancing the efficiency and reliability focus of the compliance program.

NPCC supports the strategic objective of expanding the Compliance Enforcement Initiative based on a risk assessment based approach.

NPCC commends and shares NERC's commitment to the continuing re-prioritization of resources to address future challenges in the 2014 and 2015 timeframes with only essential projected budget increases.

NPCC supports NERC utilizing its transparent and inclusive structure to develop industry wide reliability solutions to possibly be implemented by partnering organizations, including trade groups and forums.

NERC Response

NERC appreciates NPCC's input and support.

NRECA

NRECA strongly encourages NERC and the REs to maintain their focus on core Section 215-related responsibilities – standards development and compliance/enforcement activities.

NERC Response

NERC has been and remains committed to fulfilling its Section 215 responsibilities, including but not limited to standards development, compliance and enforcement. NERC looks forward to the ongoing input and support of the trade associations, industry and other stakeholders in further improving the standards development, compliance and enforcement processes as well as NERC's other activities.

SERC

The SERC Board applauds NERC and the Regional Entities for initial efforts to focus on high value items, resulting in a reduced need for significant budget increases. NERC and the Regional Entities continue to be encouraged to allocate

resources to those activities which deliver a positive contribution to bulk electric system reliability. In some cases, that may mean ceasing activities which are not currently contributing to reliability.

SERC acknowledges and greatly appreciates the progressive improvements that have been made to ERO business planning over the last couple of budget cycles.

SERC appreciates that good oversight and approval of budgets are important for proper business rigor in the ERO model. SERC is concerned, however, with the multiplicity and duplicative reviews given the Regional Entity budgets. While NERC should be expected to review Regional Entity budgets, conducting three or four public reviews after review, posting, and approval at the Regional Entity level is an unnecessary use of resources. NERC's role has moved from one of oversight to duplication of the Regional Entity's consideration and approval; this adjustment seems to ignore the organizational decision making responsibility and fiscal responsibility of the regional entity and its board of directors.

NERC Response

NERC appreciates the ongoing efforts and support of SERC and the other Regional Entities to improving the business planning and budgeting process and the efficiencies of ERO operations. NERC is committed to working with the Regional Entities to avoid duplication of efforts in connection with NERC's statutory obligation to review and approve each Regional Entity Business Plan and Budget. NERC does note that in the ERO certification process, NERC proposed that it should give a presumption of reasonableness to the budgets developed by the Regional Entities and their boards, but the Commission rejected this proposal and ruled that NERC should not give a presumption of reasonableness to the Regional Entities in the development of their budgets for statutory activities.⁵ NERC also notes that the Regional Entities engage in statutory activities solely pursuant to delegated authorities from NERC as approved by the Commission, and that pursuant to the Delegation Agreements, NERC is responsible to provide adequate funding to the Regional Entities to carry out their delegated statutory responsibilities. Therefore, it is appropriate that NERC engage in thorough reviews of the Regional Entities' proposed budgets before its Board approves them and NERC submits them to the Commission endorsed for approval.

MRC SM-TDU Sectors

SM-TDUs are concerned that the high priority items listed in the 2013 Business Plan and Budget, as revised on June 29, 2012, do not include a priority to identify and retire specific standards and requirements that are no longer needed to meet an adequate level of reliability. [Footnote omitted.] Paragraph 81 of the FERC's order conditionally accepting NERC's Find, Fix and Track proposal noted that perhaps some current requirements provide "little protection for Bulk Electric

⁵ *Order Certifying North American Electric Reliability Corporation as the Electric Reliability Corporation and Ordering Compliance Filing*, 116 FERC ¶ 61,062 (2006), at P 203.

System reliability or may be redundant.” [Footnote omitted.] FERC went on to invite NERC to make specific proposals identifying the standards or requirements and setting forth in detail the technical basis for their retirement. SM-TDUs recognize that one of the goals of 2013 is to implement process changes to identify and slate for removal administrative requirements from existing standards where feasible. [Footnote omitted.] However, there is no mention of standards retirements and the removal of administrative requirements is referred to only as a goal and not a priority. SM-TDUs urge NERC to classify the retirement of unnecessary standards or requirements as a priority and to allocate resources to this priority accordingly. The retirement of unnecessary standards and requirements will relieve the pressure on SM-TDUs to mitigate rate impacts on our customers due to increased regulatory costs accumulated through the years, particularly when our customers continue to struggle with their own financial constraints and a slow-recovering economy.

SM-TDUs agree that the standards development process should be a priority given the benefits and efficiencies to be gained. For this reason, we support, in the near term, additional resources to the standards program and in particular to the general counsel’s office. This is not to say that NERC should simply hire any personnel, but hire highly qualified personnel when available. Modest incremental increases in resources to assist the standards program are appropriate when the right people are hired to do the job. To the extent that efficiencies are later realized, then reductions in the budget would be appropriate.

SM-TDUs also support appropriate funding for the Electricity Sector Information Sharing and Analysis Center (“ES-ISAC”) which fills an information sharing and industry alert gap that cannot be addressed by enforceable reliability standards. NERC is uniquely positioned to operate ES-ISAC given its expertise and knowledge of the electricity sector. An ES-ISAC without appropriate funding will be hamstrung in fulfilling its objective, which may ultimately adversely affect the electricity sector. However, SM-TDUs urge NERC to not place further resources outside of managing the core mission as the ERO, which is to develop and enforce reliability standards, and its broader roles in government-industry coordination, information sharing, and education, including ES-ISAC. The SM-TDUs are concerned that if NERC were to take on any additional functions, this would divert needed resources from the successful completion of its current functions.

Finally, we are encouraged by the preliminary budget projections for 2014 and 2015 which reflect a zero percent increase in 2014 and a 2.1 percent increase in 2015. However, we urge the Board to adopt additional business plan assumptions on the efficiency and effectiveness of NERC and Regional Entity programs. In the area of compliance and enforcement, the assumptions should make clear that the efforts expended by NERC, Regional Entities, and Registered Entities on the paperwork associated with enforcement actions must be reduced. In the area of cyber-security and critical infrastructure protection, the Board should adopt a

business plan assumption that NERC will fully execute the plans that are now in place and avoid at all cost further “mission creep” that is not offset by curtailment of current projects.

NERC Response

NERC recognizes the importance of reviewing and modifying standards for effectiveness and to reduce the standards compliance burden on the industry. To that end NERC is working on an internal controls-based overlay on the results-based standards development approach that has already been initiated. Additionally the Commission recognized this need in its March 15, 2012, order accepting NERC’s FFT proposal.⁶ NERC staff is working diligently with the Standards Committee and industry representatives in an effort to identify standards requirements which may be eliminated with little or no risk to the reliability of the Bulk Electric System. NERC encourages the industry to monitor the progress of this project and also to actively participate in the project as it moves through the commenting and balloting phases in the second half of 2012. In addition to the efforts in enforcement processing, NERC and the Regional Entities are continuing work to transform compliance monitoring; encouraging registered entities to develop effect internal and reliability risk controls; and ensuring that compliance results are achieved efficiently to avoid undue burden and cost.

EEI

EEI has continued to offer a consistent message over the past four years in its comments to NERC concerning its budget and business plan. EEI supports NERC and remains convinced that NERC is working diligently to be responsive and responsible as the industry’s ERO. We applaud NERC for its many accomplishments. Nevertheless, we believe that NERC would benefit from greater focus on its core program areas: standards development, and compliance and enforcement. We believe that NERC’s success in these core program areas is vital to their long term success.

While EEI generally supports the proposed NERC 2013 budget, we believe the budget contains activities that are beyond the scope of Section 215 (“215”) of the Federal Power Act that distract from NERC’s core mission. We disagree with the various arguments advanced by NERC in its latest budget document that all budget activities fall within the scope of 215. To remedy this concern in an orderly manner, EEI suggests the following process.

We support NERC’s proposal to begin a stakeholder process in the fourth quarter of 2012 to establish criteria for what is within 215 and what lies outside of 215. EEI urges NERC to complete this process as soon as possible, but no later than the end of the first quarter of 2013. At that point in time, to the extent activities

⁶ *North American Electric Reliability Corporation, Order Accepting with Conditions the Electric Reliability Organization’s Petition Requesting Approval of New Enforcement Mechanisms and Requiring Compliance Filing*, 138 FERC ¶ 61,193 (2012), at P 81.

are determined to be outside of 215, EEI proposes that these activities be removed from NERC's 2013 section 215 budget. [Footnote: Ultimately, FERC will address approval of the 2013 NERC budget. EEI believes that FERC consideration of 2013 NERC budget should occur within the FERC budget docket, not as part of its pending audit docket.] To the extent the industry determines that such non-215 activities nevertheless should be undertaken in order to enhance reliability, NERC should work with the industry in order to determine which reliability entity is in the best position to undertake such activities.

EEI understands that non-215 activities that are beneficial and appropriate will need to be funded separately. We do not believe that this presents a problem, because the industry already separately funds many reliability activities outside of section 215. For example, Western and Florida registered entities fund certain WECC and FRCC activities that [are] not under section 215. Likewise, North American Transmission Forum members undertake and fund non-215 activities, and other entities such as EPRI and the EEI Spare Transformer Equipment Program (STEP) undertake separately-funded reliability activities not under Section 215.

NERC Response

NERC disagrees with EEI's general statements that NERC is engaged in activities outside of Section 215 and believes there is adequate support in its 2013 Business Plan and Budget as well as in prior Commission orders regarding the nexus between its activities and Section 215. NERC believes it is also important to recognize that many of the activities it has historically engaged in have been supported and encouraged by stakeholders. However, NERC continues to welcome stakeholder feedback and input regarding its activities and priorities. NERC appreciates EEI's support and willingness to participate in the process that NERC has outlined, in response to the report of the Commission's Office of Enforcement on its recent audit of NERC's activities, to obtain stakeholder input on the development of criteria for Section 215 activities and on the scope and priorities of NERC's activities, to be used during the next business planning cycle. NERC notes that its specific proposals have not yet been acted upon by the Commission in the audit proceeding.

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**NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION**

2013 BUSINESS PLAN AND BUDGET FILING

ATTACHMENT 5

**CALCULATION OF ADJUSTMENTS
THE AESO 2013 NERC ASSESSMENT
TO THE IESO 2013 NERC ASSESSMENT,
THE NBSO 2013 NERC ASSESSMENT,
AND THE QUEBEC 2013 NERC ASSESSMENT**

2013 Alberta Electric System Operator Adjustment
Credit for NERC Compliance Costs

	Total NERC Compliance Budget AESO NEL Allocation 2013	Total NERC Compliance Budget AESO NEL Allocation 2012		
NERC Compliance Budget				
Compliance Operations (includes Organization Registration)	\$ 6,644,000	\$ 7,993,729		
Compliance Enforcement	6,725,004	6,445,458		
Event Analysis and Investigations	6,023,424	5,075,349		
Total Compliance Budget, including Fixed Assets	\$ 19,392,428	\$ 19,514,536		
AESO NEL Share (2011)	1.298%	1.268%		
AESO Proportional Share of Compliance Costs, including Fixed Assets	\$ 251,637	\$ 247,422		
Net Total Staff	54.50	55.67		<u>2013 FTEs</u>
% Credit (36.5 of 54.5 FTEs)	66.97%	62.87%	400 Operations	15.00
\$ Credit (36.5 of 54.5 FTEs)	\$ 12,987,590	\$ 12,268,884	500 Org Registration	3.00 3.00
AESO credit for compliance costs	\$ 168,528	\$ 155,555	402 Event Anal & Investigation	15.50 13.50
Additional Credits for 2012			403 Reporting & Tracking	5.00 4.00
Credit for SAFNR	\$ 725,500	\$ 473,596	404 Enforcement	16.00 16.00
	<u>\$ 725,500</u>	<u>\$ 473,596</u>		<u>54.50 36.50</u>
AESO NEL Share (2011)	1.298%	1.268%		
AESO credit for additional costs not allocated	\$ 9,414	\$ 6,005		
Total AESO Credit	\$ 177,942	\$ 161,560	\$ 16,382	10.1%
NERC Assessment	\$ 466,437	\$ 460,237	\$ 6,200	1.3%

2013 IESO Adjustment
Credit for NERC Compliance Costs

	<u>2013</u>	<u>2012</u>	<u>Change</u>	
NERC Compliance Budget				
Compliance Operations (includes Organization Registration)	\$ 6,644,000	\$ 7,993,729		
Compliance Enforcement	6,725,004	6,445,458		
Event Analysis and Investigations	6,023,424	5,075,349		
Total Compliance Budget, including Fixed Assets	<u>19,392,428</u>	<u>19,514,536</u>	<u>(122,108)</u>	<u>-0.70%</u>
Total Compliance Staff	<u>54.50</u>	<u>55.67</u>	<u>(1.17)</u>	
% Credit (46.5 of 54.5 FTEs)	<u>85.32%</u>	<u>85.63%</u>	<u>-0.31%</u>	
\$ Credit (46.5 of 54.5 FTEs)	\$ 16,545,833	\$ 16,710,220		
Credit for SAFNR	725,500	473,596		
	<u>\$ 17,271,333</u>	<u>\$ 17,183,816</u>	<u>87,517</u>	<u>0.57%</u>
IESO NEL Share (2011)	<u>3.167%</u>	<u>3.118%</u>		
IESO Credit - NERC Costs, including Fixed Assets	<u>\$ 546,926</u>	<u>\$ 535,844</u>	<u>11,082</u>	<u>2.22%</u>
Total NERC Assessment	\$ 1,035,450	\$ 1,028,513	\$ 6,937	0.67%

**2013 New Brunswick Adjustment
Credit for NERC Compliance Costs**

	<u>2013</u>	<u>2012</u>	<u>Change</u>	
NERC Compliance Budget				
Compliance Operations (includes Organization Registration)	\$ 6,644,000	\$ 7,993,729		
Compliance Enforcement	6,725,004	6,445,458		
Event Analysis and Investigations	6,023,424	5,075,349		
Total Compliance Budget	<u>19,392,428</u>	<u>19,514,535</u>		
Total Compliance Staff	<u>54.50</u>	<u>55.67</u>		
% Credit (46.5 of 54.5 FTEs)	<u>85.32%</u>	<u>85.63%</u>		
\$ Credit (46.5 of 54.5 FTEs)	\$ 16,545,833	\$ 16,710,219		
Credit for SAFNR	<u>725,500</u>	<u>473,596</u>		
	<u>\$ 17,271,333</u>	<u>\$ 17,183,815</u>		
New Brunswick NEL Share (2011)	<u>0.306%</u>	<u>0.298%</u>		
New Brunswick Credit - NERC Costs, including Fixed Assets	<u>\$ 52,906</u>	<u>\$ 51,279</u>	1,627	3.2%
NERC Assessment	\$ 100,162	\$ 98,427	1,735	1.8%

2013 Quebec Adjustment
Credit for NERC Compliance Costs

	Total NERC Compliance Budget Quebec NEL Allocation	Quarterly											
NERC Compliance Budget													
Compliance Operations (includes Organization Registration)	\$ 6,644,000												
Compliance Enforcement	6,725,004												
Event Analysis and Investigations	6,023,424												
Total Costs, including Fixed Assets	19,392,428												
Quebec NEL Share (2011)	4.123%												
Quebec Proportional Share of Compliance Costs, including Fixed Assets	\$ 799,467			2013 Compliance FTEs									
			<u>Total</u>	<u>Credit</u>									
		400	Operations	15.00									
		500	Org Registration	3.00 2.00									
		402	Event Anal & Investigation	15.50 13.50									
		403	Reporting & Tracking	5.00 4.00									
		404	Enforcement	16.00 16.00									
				<u>54.50 35.50</u>									
Total Compliance Staff	54.50												
% Credit (35.5 of 54.5 FTEs)	65.14%												
\$ Credit (35.5 of 54.5 FTEs)	\$ 12,631,765												
Quebec Credit (Proportional share of all costs x % Credit)	\$ 520,754												
<table border="1" style="width: 100%; border-collapse: collapse;"> <tbody> <tr> <td style="width: 50%;">Proportional Share of NERC Compliance Costs paid by Régie de l'énergie</td> <td style="width: 25%; text-align: right;">\$ 278,713</td> <td style="width: 25%; text-align: right;">\$ 69,678</td> </tr> <tr> <td>Proportional Share of NPCC CORC Program paid by Régie de l'énergie (Refer to Column H-2, page 83, NPCC Business Plan and Budget)</td> <td style="text-align: right;">\$ 1,369,666</td> <td style="text-align: right;">\$ 342,417</td> </tr> <tr> <td>2012 Billing to Régie de l'énergie for Compliance Program Costs-NERC and NPCC</td> <td style="text-align: right;">\$ 1,648,379</td> <td style="text-align: right;">\$ 412,095</td> </tr> </tbody> </table>					Proportional Share of NERC Compliance Costs paid by Régie de l'énergie	\$ 278,713	\$ 69,678	Proportional Share of NPCC CORC Program paid by Régie de l'énergie (Refer to Column H-2, page 83, NPCC Business Plan and Budget)	\$ 1,369,666	\$ 342,417	2012 Billing to Régie de l'énergie for Compliance Program Costs-NERC and NPCC	\$ 1,648,379	\$ 412,095
Proportional Share of NERC Compliance Costs paid by Régie de l'énergie	\$ 278,713	\$ 69,678											
Proportional Share of NPCC CORC Program paid by Régie de l'énergie (Refer to Column H-2, page 83, NPCC Business Plan and Budget)	\$ 1,369,666	\$ 342,417											
2012 Billing to Régie de l'énergie for Compliance Program Costs-NERC and NPCC	\$ 1,648,379	\$ 412,095											
Additional Credits for 2013													
Credit for SAFNR	\$ 725,500												
	\$ 725,500												
Quebec NEL Share (2011)	4.123%												
Quebec credit for additional costs not allocated	\$ 29,909												
Total Quebec Credit for 2013	\$ 550,663												

DOCKET NO. RR12-__-000

**NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION**

2013 BUSINESS PLAN AND BUDGET FILING

ATTACHMENT 6

**STATUS REPORT ON THE ACHIEVEMENT
OF NERC'S 2012 GOALS**

ATTACHMENT 14

Status Report on the Achievement of NERC's 2012 Goals and Objectives

This Attachment provides a summary of NERC's 2012 goals and objectives and a status report on their achievement as of June 30, 2012. Pages 3-25 of this Attachment was presented before stakeholders and NERC's Board of Trustees at the August 16, 2012 open meeting of NERC's Corporate Governance and Human Resources Committee. Similar reports are prepared and presented each quarter at approximately the same time NERC prepares and presents in open session to the NERC's Finance and Audit Committee its quarterly and year to date financial reports compared budgeted to actual expenditures, together with a year-end rolling year end projection.

During the first two quarters of 2012, NERC and the Regional Entity Executive Management Group continued to improve and refine the ERO business planning and budgeting process through the development and integration of a multi-year strategic plan. The *2012-2015 ERO Enterprise Strategic Plan*¹ is focused on implementing relevant standards; promoting effective collaboration, cooperation, and communication around important risks to reliability; and utilizing expertise from the industry to produce outcomes that improve reliability. The plan also sets forth an expectation to engage stakeholders in valuable review and feedback, incorporate applicable governmental requirements and directives, and take into account additional Provincial considerations, as appropriate. Utilizing the concepts of this plan, NERC and the Regional Entities continue their strategic planning initiative by demonstrating the depth of ERO leadership and dedication to improving the reliability of the North American bulk power system and focusing on the following goal areas for 2012:

- Identify the most significant risks to reliability
- Be accountable for mitigating reliability risks
- Promote a culture of reliability excellence
- Improve transparency, consistency, quality and timeliness of results
- Operate as a collaborative enterprise
- Improve efficiencies and cost effectiveness
- Develop clear, reasonable and technically sound mandatory reliability standards in a timely and efficient manner
- Be a strong enforcement authority that is independent, without conflict of interest, objective and fair
- Promote a culture of compliance with mandatory reliability standards across the industry

¹[https://www.nerc.com/docs/bot/finance/2013%20NERC%20Business%20Plan%20and%20Budget/ERO%20Enterprise%20Strategic%20Plan%202012-2015%20FINAL%20\(02%202012\)%20\(2\).pdf](https://www.nerc.com/docs/bot/finance/2013%20NERC%20Business%20Plan%20and%20Budget/ERO%20Enterprise%20Strategic%20Plan%202012-2015%20FINAL%20(02%202012)%20(2).pdf)

A set of specific 2012 objectives with a measure, a threshold and a target for each objective was developed and is being used to track and weight progress throughout each program area for 2012. The specific 2012 objectives, measures, thresholds and targets, with a weighted percentage for each objective, are shown in the table on pages 12-25 of this Attachment.

The 2012 goals and objectives are applicable to NERC's overall operations and activities, and most of them impact more than one (in some cases all) of NERC's statutory and administrative program areas. Pages 6 through 8 of this Attachment identify the priority deliverables and other important deliverables for 2012. NERC management continues to track, and periodically report to its Board of Trustees and stakeholders, the progress in achieving the goals, objectives and deliverables. As shown by the charts on pages 9 through 11 of this Attachment, progress is being tracked throughout the year on a department-by-department basis. Pages 9 through 11 of this Attachment provide summary information on the status of achievement of the 2012 goals and objectives as of June 30, 2012. The bar chart on page 9 shows the progress of each of the departments as of June 30, 2012, in achieving department goals (*i.e.*, measured as a percent of each department's goals). Pages 12 through 25 provide detailed information on an objective-by-objective basis. The information on these pages represents a consolidation of information presented by NERC management at the February 2012 and August 2012 meetings of NERC's Corporate Governance and Human Resources Committee.

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

2012 NERC Performance Report

through June 30, 2012

Gerry Cauley
President and CEO
August 15, 2012

RELIABILITY | ACCOUNTABILITY



- 2012 corporate performance measures based on
 - 2012-2015 ERO Enterprise Strategic Plan (goals, objectives, and pre-established metrics)
 - 2012 corporate business plan and budget
 - Three-year ERO Performance Assessment
- Progress is reviewed quarterly with management team
- Results are used in determining performance compensation at corporate and department levels

- Corporate performance measures are structured around the framework provided by the ERO Enterprise Strategic Plan, spanning goals in three areas:
 - Standards and compliance
 - Risks to reliability
 - Coordination and collaboration

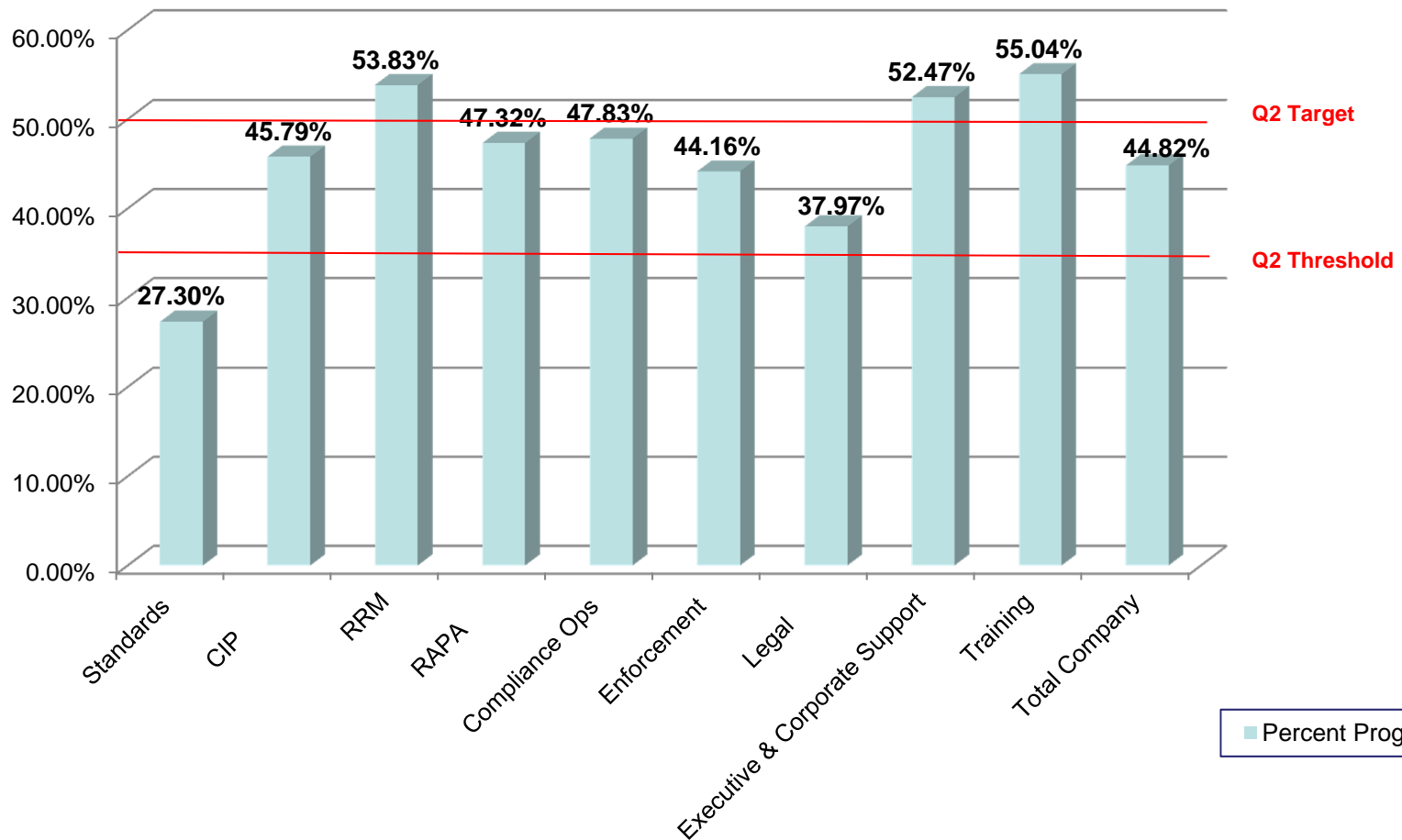
Highest weighted corporate objectives:

- Technically sufficient set of results-based reliability standards
- Efficient and timely standards development process
- Robust set of critical infrastructure reliability standards
- Event analysis program that engages Bulk Power System (BPS) owners, operators, and users in improving BPS reliability
- Risk of large scale failures of the BPS is minimized

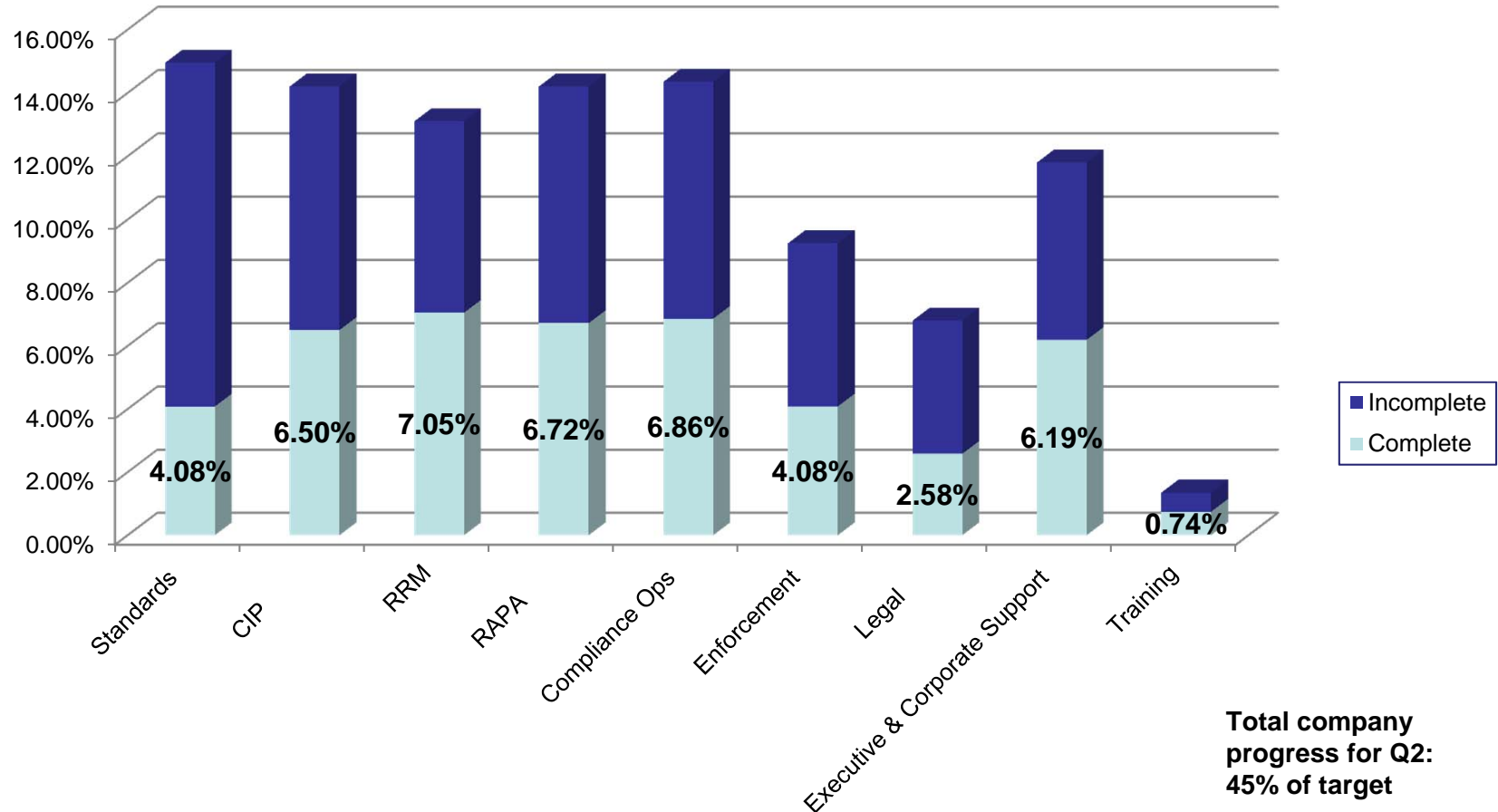
- Accountability for standards (provide ALR)
- Technical references or application guides
- Efficient and timely compliance outcomes
- Find, Fix, Track, and Report enhancements, Spreadsheet Notice of Penalties, etc.
- Reduction of NERC/Regional Entity caseload index
- Close out of outstanding enforcement cases
- Identification of the nature of violations
- Mitigation of compliance risks
- Effective reliability risk controls
- Risk-based compliance monitoring (Entity Assessment)
- Track and trend reliability issues

- Situational awareness and presence at NCCIC
- Reliability assessments
- Risk management strategies
- Cyber security risk assessment tools
- Reliability data modeling
- Consistency in advisories and recommendations
- Comprehensive emergency disaster, business continuity, and industry-wide communications planning
- Qualified trained staff
- Secure information management
- Improved resource efficiency and allocation

Department Performance – Q2



Department Contributions



* Executive and Corporate Support includes: IT, Government Relations, Finance, and other corporate support functions and measures.

Leading Results

- Identify violations associated with system events
- Track and trend reliability issues
- Educate on effective compliance programs and risk-based monitoring
- Enhance event analysis and situational awareness (ES-ISAC)
- Deliver reliability assessments and emerging issues
- Qualify and train staffs (NERC and REs)
- Continue emergency, disaster planning
- Certify for critical ERO functions
- Implement recommendations from 3yr ERO Performance Assessment

Lagging Results

- Reduce standards-related directives
- Revise standards process to meet one year criterion
- Complete set of critical infrastructure reliability standards
- Process time objectives for FFTs
- Evaluate entities' critical cyber assets
- Monitor compliance through alternative risk-based approaches
- Implement risk management strategies, measures, and a plan
- Implement NERC public website
- Improve reliability data modeling

NERC Corporate Performance – Q2 2012

08.15.12

Strategic Goal Area	2012 Objective	Measure	Threshold	Target	Weight	Progress towards Target (at Q2)	Quarterly Status
1. Standards and Compliance	Develop a technically sufficient set of results-based reliability standards, with each requirement providing a clearly and unambiguously identified performance expectation and reliability benefit.	Number of new, or substantively revised standards delivered for board approval, excluding retirements	12 standards	16 standards	8%	50.0%	8 standards total – with five standards in Q2 that have been approved by the Board: FAC-003-3/x, PRC-00501.1b, TOP-001-2, TOP-002-3, and TOP-003-2
2. Standards and Compliance	Be accountable to applicable regulatory authorities and the public for standards that provide an adequate level of reliability.	Reduction (in percent) of standards-related directives remaining compared to 260 directives at 2012 year beginning, including any new directives issued	20% reduction (260 to 208)	30% reduction to 182	2%	0.0%	In Q2, the rate of new directives being issued by FERC exceeds the rate at which NERC is addressing prior directives. <ul style="list-style-type: none"> • FERC newly issued directives = 11 • NERC filed standards addressing 11 directives = (-11) • Net = 0 YTD
3. Standards and Compliance	Working with industry, develop options to improve the efficiency and timeliness of standards development such that high priority standards may be targeted for completion in one year.	Process revisions that meet the one year criterion	Drafted for public comment	Revisions complete and ready for board approval by yearend	5%	10.0%	Posted, for stakeholder comment, the initial draft of revisions to the standards process and rules of procedure (ROP). <ul style="list-style-type: none"> • Communication and outreach plan developed and in the process of being implemented • Webinar conducted to roll out the proposed revisions to industry and solicit feedback Standard Process Improvement Group (SPIG) initiatives may

NERC Corporate Performance – Q2 2012

08.15.12

Strategic Goal Area	2012 Objective	Measure	Threshold	Target	Weight	Progress towards Target (at Q2)	Quarterly Status
							influence.
4. Standards and Compliance	Work with industry to develop technical references or application guides for reliability standards to ensure clarity and facilitate implementation.	Develop plan a) listing priorities based on risk and clarity gap, and b) identifying formats and procedures (use existing formats as appropriate such as RSAWs, regional entity application guides, standards references, CANs, etc.)	Plan and templates developed	Application guides or technical references delivered for 10 standards	3%	30.0%	Three qualifying documents have been delivered. In Q2, one whitepaper, one CAN and one bulletin were issued. Plans are to develop and produce two more papers, 19 more CANs, and 13 RSAWs by year end.
5. Standards and Compliance	Develop a robust set of critical infrastructure reliability standards that enable industry to adapt to continuously changing threats and vulnerabilities by emphasizing security risk management.	Complete the CIP Version 5 standards (or equivalent) by yearend 2012	Approved by industry through successive ballot	Approved by industry through recirculation ballot and ready for board approval	5%	10.0%	Industry approved 1 standard in successive ballot and the remaining 9 standards are all above 50% but below the 2/3 rd majority required. In Q2, completed successive ballot with significant improvements (1 of 10 standards achieved with 67% approval). Another successive ballot expected in Q3.

NERC Corporate Performance – Q2 2012

08.15.12

Strategic Goal Area	2012 Objective	Measure	Threshold	Target	Weight	Progress towards Target (at Q2)	Quarterly Status
6. Standards and Compliance	Continue to develop enhancements to enforcement processing to achieve efficient and timely compliance outcomes, including streamlined procedures for lesser risk violations and improved workflow and tools at NERC and regional entities. Explore alternatives to refining discretion focused on targeting violations most implicated in large events.	Average process duration for lesser risk violations filed in 2012 from discovery to filing, excluding those with discovery dates preceding July 1, 2011	6 months	4.5 months	2%	35.0%	Average discovery to filing of FFT, discovered after July 1, 2011, is approximately 6.11 months (note that entity compliance with FERC March 15 th Order delayed processing in March and April).
	Further develop FFT enhancements, spreadsheet NOPs, and other efficiencies and options for exercising discretion for lesser risk violations.	Average process duration for greater risk violations from discovery to filing, excluding those with discovery dates preceding July 1, 2011	12 months	10 months	2%	50.0%	Average discovery to filing of NOPs, discovered after July 1, 2011, is approximately 7.41 months.
		Yearend six-month rolling average of total FFT and spread-sheet NOPs filed monthly as a percent of active violations	4%	6%	2%	27.0%	The six month average of total FFT and SNOP filed monthly as a percent of active violations is approximately 2.9%.

NERC Corporate Performance – Q2 2012

08.15.12

Strategic Goal Area	2012 Objective	Measure	Threshold	Target	Weight	Progress towards Target (at Q2)	Quarterly Status
7. Standards and Compliance	Reduce NERC/RE caseload index (proxy for how many months work remain in caseload)	Six-month rolling average of active violations divided by monthly filings and dismissals	18 months	12 months	3%	43.0%	The six-month rolling average of active violations divided by monthly filings and dismissals (caseload index) is approximately 15.2 months.
8. Standards and Compliance	Close outstanding enforcement cases with violation dates from 2007 – 2010	Number of cases remaining unfiled with violation date preceding January 1, 2011	75% reduction, excluding those held by proceedings at FERC or court	Zero left, excluding those held by proceedings at FERC or court	2%	50.0%	The reduction as of July 5 is approximately 38%. Including violations NERC is in the process of preparing to file at the end of July and August, the approximate reduction will be 49%.
9. Standards and Compliance	Identify nature of violations associated with most significant system events and develop a plan for addressing risks in these areas.	Report on requirements most correlated to significant events (Category 3 and above) and plan for addressing risks	Report on risks correlated to significant events	Report on risk control strategies to address top 3 issues identified	2%	65.0%	As of June 30, identified reported to BOTCC in closed the nature of violations associated with the most significant system events. <ul style="list-style-type: none"> • Next step is to develop plan and report on risk control strategies to address these risks. • Recommended strategies to address the top risks expected to be completed by the end of Q3. Analytical work was the most time consuming component of this measure and was completed at end of Q2.

NERC Corporate Performance – Q2 2012

08.15.12

Strategic Goal Area	2012 Objective	Measure	Threshold	Target	Weight	Progress towards Target (at Q2)	Quarterly Status
10. Standards and Compliance	Develop a program to allow compliance trials following NERC board approval of reliability standards, for the purpose of allowing industry to come into compliance and mitigate compliance risk while the ERO validates compliance measures and procedures, minimizing inefficiencies and detrimental effects of learning through enforcement.	Develop report outlining process and instruments to be used, and identifying candidate standards for demonstration	Report published	Pilot initiated for 1 new standard	3%	50.0%	Draft report written with added detail to include assessment of self report and self certification impacts. Use of current audit procedures underway.
11. Standards and Compliance	Educate industry on effective compliance programs and effective reliability risk controls.	Identify and document case studies of entities with exemplary compliance risk and reliability risk controls	1 large entity and 1 small entity	1 additional case study	2%	50.0%	Initial contact / interviews and outreach with 3 large entities and have developed an example case study. <ul style="list-style-type: none"> NATF has been requested to participate in developing principles for effective compliance programs and reliability risk controls Registrant’s submitted source documents reviewed
		Continue CIP-002 Sufficiency Review Program (SRP) to evaluate entities’ Critical Assets and Critical Cyber Assets lists	Conduct 6 SRPs	Conduct 10 SRPs	2%	23.0%	Conducted 2 SRPs Scheduled and confirmed 11 SRPs to be completed in 2012.

NERC Corporate Performance – Q2 2012

08.15.12

Strategic Goal Area	2012 Objective	Measure	Threshold	Target	Weight	Progress towards Target (at Q2)	Quarterly Status
12. Standards and Compliance	Develop risk-based compliance monitoring approaches to maximize reliability benefits and improve efficiencies, and to encourage effective internal controls at registered entities.	Identify and assess through pilot testing alternative risk-based approaches to monitoring compliance, including use of sampling methods	Report on alternative approaches for monitoring compliance	Complete three pilot tests to demonstrate methods	3%	25.0%	<p>Initial report in May to BOTCC. Report being revised and will be resubmitted to BOTCC in Q4. Activities to date included:</p> <ul style="list-style-type: none"> Refined risk based compliance monitoring paper presented at May BOTCC Open Worked with industry, Regions and NERC CCC on a critical component of the entity assessment as an initial start point for alternative auditing The entity assessment component of the report is in final development and will be posted by end of July for broad industry review and comment No pilot tests completed as of end of Q2.
13. Risks to Reliability	Trend reliability issues and improvement opportunities and share results transparently with bulk power system owners, operators, and users.	Report on state of reliability identifies risk clusters and trends	Report delivered by Q3	Report completed by Q2	3%	100.0%	<p>2012 State of Reliability report approved by the Board on May 9 with public release on May 9</p>

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Strategic Goal Area	2012 Objective	Measure	Threshold	Target	Weight	Progress towards Target (at Q2)	Quarterly Status
14. Risks to Reliability	Provide an event analysis program that engages bulk power system owners, operators, and users in determining root causes, lessons learned, and other improvement opportunities; ensure all events meeting criteria are catalogued, prioritized, and assessed for improvement opportunities.	Percent reporting of reportable events and quality of reports as measured by NERC review	95% of reportable events have reports submitted	80% approval according to quality review criteria	5%	88.0%	<ul style="list-style-type: none"> Received 100% of the event reporting (brief, EARs etc.) necessary since Jan 1, 2012. Based on quality criteria, receiving 100% of what is required in the appropriate areas to determine “what happened”. Based on quality criteria, have sufficient information in 100% of the reports received to trend some level of causes for further analysis on the BPS Based on new cause coding quality criteria, 70% of these reports trend the root cause.
15. Risks to Reliability	Develop and maintain situational awareness capability that meets the needs of FERC, NERC, and applicable registered entities.	Delivery of SAFNR tool	System delivery and testing complete.	All U.S. reliability coordinators connected	2%	62.0% (8 out of 13)	<p>System testing and deliver complete. 8 out of 13 RCs connected as of end of Q2. Data streaming live from 8 RCs: ERCOT, ISO-NE, WECC, Vacar-Duke, Vacar-Santee Cooper, Vacar-Scana, SoCo, SPP/ICTE.</p> <ul style="list-style-type: none"> The eDNA data Historian has been completed and is ready for downloading by NERC SA (requires IT support) In July SA expects to roll out the SAFNR V2 system to FERC staff, RCs and Regional Staff. 10-12 RCs providing live data to NERC’s SA Monitors (and DC monitors)

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Strategic Goal Area	2012 Objective	Measure	Threshold	Target	Weight	Progress towards Target (at Q2)	Quarterly Status
							by mid Q3
16. Risks to Reliability	Deliver reliability assessments of strategic emerging issues that may impact reliability.	Number of special issue reports approved	4 special issue reports approved	6 special issue reports approved	3%	66.0%	<ul style="list-style-type: none"> • Geomagnetic Disturbance Task Force Interim Report approved by Board on Feb 23 • Severe Impact Resilience Report and Cyber Attack Report approved by Board on May 9 • Event Driven Index Whitepaper in Q2
17. Risks to Reliability	Minimize the risk of large scale failures of the bulk power system.	Number of Category 5 events (10,000 MW generation or load loss) not acts of nature		No Category 5 events (excluding acts of nature)	10%	50.0%	<i>A qualifying category 5 event (not due to a natural disaster) would result in a 10% adjustment for each program, this allocation was omitted from the overall total and the other objectives were adjusted to total 100%.</i>
18. Risks to Reliability	Develop and implement risk management strategies for highest tier reliability risks.	Identify high priority risk management projects and develop plan	2 projects identified and planned	3 projects	2%	50.0%	Cold weather generator preparation and relay misoperation projects identified and planned. Work underway on both.
		Identify success measures and benchmark	Measures for each project	Benchmarks complete	2%	20.0%	Success benchmarks being developed from risk portfolio.
		Implement plan	Project started	On schedule at yearend	2%	20.0%	Projects identified above. Work underway.

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Strategic Goal Area	2012 Objective	Measure	Threshold	Target	Weight	Progress towards Target (at Q2)	Quarterly Status
19. Risks to Reliability	Enhance situational awareness within the electricity sub-sector and with government through ES-ISAC, such as presence at NCCIC and other governmental classified forums.	Establish presence on NCCIC floor	1 ES-ISAC staff have access to NCCIC	2 ES-ISAC staff have access to NCCIC	2%	70.0%	1 person has access to NCIC as of June 30, 2012.
		Develop and implement initial declassified NCCIC framework in ES-ISAC	Design ES-ISAC wall of knowledge component	Test initial prototype	2%	40.0%	Renewed contract for supply of threat information to assist in analytics. <ul style="list-style-type: none"> • Basic display wall functionality now exists; working with IT to acquire additional hardware such as phones and computers • Finalized vendor procurement ; in process of scheduling training for CID team • Pilot of threat indicators search tool for ES-ISAC analytics is in progress • Pilot a new system for tracking incident reports received by ES-ISAC
		Unclassified information products for registered entities based on classified sources	Continually populate ES-ISAC portal with indicator bulletins	Registration on ES-ISAC portal by 50% of registered entities	2%	75.0%	Approximately 35% of all registered entities are represented on the portal spanning 404 unique user accounts. <ul style="list-style-type: none"> • ES-ISAC meets weekly with FERC to discuss products and activities • The ES-ISAC secure members portal is being updated daily/weekly. Since April (go-live) the ES-ISAC has posted 48 watchlist items, 3 indicator reports, 3 crossposting reports from ICS-CERT and 27 newsfeed items; updates

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Strategic Goal Area	2012 Objective	Measure	Threshold	Target	Weight	Progress towards Target (at Q2)	Quarterly Status
							<p>include the posting of ICS-CERT alerts, posts detailing current vulnerabilities and mitigations, and relevant presentations</p> <ul style="list-style-type: none"> Indicators of compromise are being harvested from the classified US-CERT portal and reformatted for distribution to the BPS registered entities
20. Risks to Reliability	Develop cyber security risk assessment tools for industry use, including maturity or mode of attack models.	Perform exercises based on attack tree modeling and support DOE maturity model	3 exercises at host entities	6 exercises at host entities, including DOE pilot	2%	47.0%	<p>Two CRPAs completed by end of Q2.</p> <ul style="list-style-type: none"> Two confidentiality agreements for two prospective participants have been fully executed; dates for exercises are June and August Outreach to prospective participants continues Concluded Phase I of White House/DOE Security Risk Management Maturity Model. Resulted in the Risk Management Model (17 entities participated in the development). Participated in National Level Exercise 2012.
21. Risks to Reliability	Assist industry in improving reliability data modeling, including generator and turbine controls and load modeling.	Continue workshops on improved modeling. Engage all three interconnections in model improvement	Report on improvement requirements and plan for improvement	Data request to support model improvement	3%	20.0%	<p>Data requests and report being developed.</p> <ul style="list-style-type: none"> NERC / EPRI Geomagnetic Disturbance Analysis and Modeling Workshop held April 18-20 in Atlanta May 2012 Model Validation Workshop held May 2-3 in

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Strategic Goal Area	2012 Objective	Measure	Threshold	Target	Weight	Progress towards Target (at Q2)	Quarterly Status
							Atlanta
22. Risks to Reliability	Manage a consistent program for issuing advisories, recommendations and essential actions, and track and report mitigation results. Conduct these activities using tools, processes, and authorities.	Tools for tracking recommendations from alerts, event analysis, and other sources	Specifications for electronic issuance of Alerts and tracking of progress on recommendations	System operational and testing completed	2%	35.0%	Specifications completed and RFP submitted to vendors.
23. Risks to Reliability	Facilitate the conduct of comprehensive emergency, disaster, and business continuity planning.	Develop and test national security crisis response plan	Develop and review plans; test internally	Test internally and assess during 1 additional exercise, such as Cyber Storm IV	2%	50.0%	Draft Crisis Action Plan test internally with ES ISAC during the National Level Exercise Q2 2012. Draft in process of being finalized, Q3 internal table top exercise and finalize Plan in Q4.
24. Coordination and Collaboration	Maintain easy-to-navigate, accessible reliability information through a library of lessons learned from event analyses, best practices, examples of excellence, and other resources for reliability improvement.	Implement NERC public website using SharePoint 2010	Website operational	Implement metadata for rapid search capability	2%	15.0%	The redesign process is underway. Numerous sessions for site governance, document retention and document migration will be held during Q3 in anticipation of development (coding) work in Q3 for site structure and implementation.
25. Coordination and Collaboration	Develop and implement an industry-wide communications plan to build awareness of work by the ERO and industry to improve reliability.	Develop quarterly reporting mechanism to detail ERO activities that addresses BPS risk	Reports for Q2-4 2012	Reports for Q1-4 2012	2%	33.0%	Quarterly consolidated report not issued during reporting period. <ul style="list-style-type: none"> Consolidated report will be published in Q3 and Q4 in NERC news. Q3 report will cover Q1 and Q2 activities. Q4 report will cover Q3 and

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Strategic Goal Area	2012 Objective	Measure	Threshold	Target	Weight	Progress towards Target (at Q2)	Quarterly Status
							<p>Q4 activities.</p> <ul style="list-style-type: none"> Major individual reports issued during reporting period included including the State of Reliability Report, the GMD Report and the Summer Assessment, the Joint Report on SW Blackout and the Joint Report on the NE Snow Storm. This was in addition to Human Performance Workshop and GMD workshops.
26. Coordination and Collaboration	Develop highly qualified and trained staffs at NERC and the regional entities, including enhancement of qualifications in auditing, investigations, enforcement, and other essential staff roles.	a.) Develop certification criteria for critical ERO functions	a.) Auditor qualifications documented	a.) Investigator qualifications also	2%	75.0%	Auditor and Investigator qualifications documented by end of Q2. Undergoing final review and coordination with Regions.
		b.) Conduct continuing training on auditing, investigating, root cause, and human factors	b.) 95% of all auditors and investigators have 2 days of training or more	b.) 100% of auditors and investigators at NERC and regions, programs available to registered entities	2%	70.0%	Completed first of two CEA trainings (>70% of the CEA auditors attended). Completed auditor training session for industry in Q1, 99 in person participants and 100 webinar participation.
27. Coordination and Collaboration	Deliver the initial modules of a secure information management system to achieve efficiencies, consistency of outcomes, effective process controls, and more transparent accountability across the	Deliver business requirements and functional requirements for one ERO application	Design 2 agreed upon applications	Implement 2 agreed upon applications	3%	40.0%	<p>OATI developed violations application (webCDMS+) is in production and data from all Regions is being backfilled into the database.</p> <ul style="list-style-type: none"> Continue to verify the data and work with the Regions on re-implementing business rules to ensure ongoing data consistency Developing next steps to

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Strategic Goal Area	2012 Objective	Measure	Threshold	Target	Weight	Progress towards Target (at Q2)	Quarterly Status
	statutory functions of ERO enterprise.						include document synchronization in SharePoint 2010 targeted for Q3 implementation The Events Analysis project was identified as the number two project by the ERO EMG and NERC business requirements have been gathered and the PMO is in the process of validating those requirements with the business owners (RAPA, RRM, CID).An initial meeting held with the Regions to begin gathering business requirements in anticipation of a comprehensive Request for Proposal to be submitted to vendors by mid Q3.
28. Coordination and Collaboration	Develop an ERO-wide risk management program with effective internal controls to ensure the ERO is addressing organizational risks and successfully fulfilling its statutory mission.	Governance established, executive hired and 2012 work plan completed	Governance adopted and executive hired	2012 work plan complete and 2013 activities in business plan filed	2%	70.0%	Charter approved, Risk Management and Internal Controls Subcommittee established, Risk Management Executive hired.
29. Coordination and Collaboration	Address recommendations and directives from the Three-Year ERO Assessment and previous audits.	Recommendations completed from 3 year assessment	90%	100%	2%	98.0%	Of the 161 NERC actions, only 3 have not been completed or otherwise incorporated into on-going activities.
		Recommendations completed from FERC audit and previous audits	90%	100%	2%	25.0%	FERC Audit under appeal. Uncontested recommendations in process of being implemented. Implementation of some recommendations may, by their nature, require more than one year

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Strategic Goal Area	2012 Objective	Measure	Threshold	Target	Weight	Progress towards Target (at Q2)	Quarterly Status
							implementing. Some recommendations open and subject to final FERC determination.
30. Coordination and Collaboration	Implement additional operating and financial controls to improve resource efficiency and allocation	Budgetary performance	Yearend working capital equal to or greater than budgeted	Combined expense and fixed asset expenditures within budget	3%	50.0%	Projecting at least several million greater than budget in working capital. Combined expense and fixed asset expenditures projected to be under budget. However since only through Q2 only reporting 50%. However, projections indicate Target will be exceeded

DOCKET NO. RR12-__-000

**NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION**

2013 BUSINESS PLAN AND BUDGET FILING

ATTACHMENT 7

**METRICS COMPARING
REGIONAL ENTITY OPERATIONS
BASED ON
THE 2013 BUDGETS**

ATTACHMENT 15

METRICS COMPARING REGIONAL ENTITY OPERATIONS BASED ON THE 2013 BUDGETS

Introduction

This Attachment provides metrics on the Regional Entities' operations based on their 2013 Business Plans and Budgets, and analysis of the metrics. Consistent with the similar attachments provided in NERC's 2010, 2011 and 2012¹ Business Plan and Budget filings, this Attachment focuses on providing quantitative data and information for the Regional Entities. The metrics focus primarily on the Regional Entities' Compliance Monitoring and Enforcement Programs (Compliance Program). This Attachment contains:

- tables providing the 2013 budget metrics values for each Regional Entity (page 5);
- a series of bar charts comparing the Regional Entities' Compliance Program 2013 budgeted costs (pages 6-8);
- a series of bar charts comparing the Regional Entities' projected costs for 2013 for "small," "medium" and "large" on-site and off-site operational compliance audits²

¹ In accordance with the Commission's order on NERC's 2012 Business Plan and Budget filings, metrics for 2012 projected values are not provided. *North American Electric Reliability Corp., Order Accepting 2012 Business Plan and Budget of the North American Electric Reliability Corporation*, 137 FERC 61,071 (2011), at PP 23-27.

² An "operational" audit as referred to in this Attachment is an audit of the registered entity's compliance with the operations and planning or "Order 693" reliability standards. For purposes of this presentation (and consistent with the definitions used in the 2010, 2011 and 2012 Business Plan and Budget filings), a "small" operational compliance audit involves 25 or fewer reliability standard requirements to be audited; a "medium" operational compliance audit involves 26 to 75 requirements to be audited; and a "large" operational compliance audit involves more than 75 requirements to be audited. An on-site compliance audit takes place at the registered entity's site, while an off-site compliance audit takes place at another location, typically the Regional Entity's offices. As can be seen from the table on page 5 and from the bar charts on pages 9-10, MRO, ReliabilityFirst, SPP RE, Texas RE and WECC are not planning any "small" on-site operational compliance audits in 2013, SPP RE and WECC are not planning any "medium" on-site operational compliance audits in 2013, and ReliabilityFirst is not planning any "large" on-site operational audits in 2013. Also, FRCC, ReliabilityFirst, and SERC are not planning any "medium" off-site operational audits in 2013, and FRCC, MRO, ReliabilityFirst, SERC, SPP RE and Texas RE are not planning any "large" off-site audits. The latter fact (that six Regional Entities plan no large off-site operational audits) reflects that if the registered entity has more than 75 requirements to be audited, the Regional Entity will likely conclude that an on-site compliance audit should be conducted.

and “small” and “large” on-site and off-site CIP compliance audits³ (pages 9 through 11);

- trend line plots of the Regional Entities’ 2013 Compliance Program budgets against numbers of registered entities and numbers of registered functions in each Region (page 12);
- bar charts comparing the Regional Entities’ numbers of registered entities per Compliance Program FTE⁴ and numbers of registered functions per Compliance Program FTE based on their 2013 budgets (page 13);
- bar charts comparing the Regional Entities’ numbers of registered entities per Compliance Program FTE and numbers of registered functions per Compliance Program FTE in their 2012 and 2013 Business Plans and Budgets (page 14); and
- discussion and analysis of the metrics (pages 15-20). The discussion and analysis focuses on variations in the Regional Entity metrics based on their 2013 budgets and possible reasons for the variations.

³ For purposes of this presentation, a “small” CIP compliance audit involves an entity with no critical cyber assets and 5 requirements. (There are requirements of the CIP standards that apply to registered entities with no critical cyber assets, for example, the requirements of CIP-001 concerning sabotage reporting and response; the requirements of CIP-002 which require the registered entity to have a risk-based assessment methodology and to use it annually to identify any critical assets and critical cyber assets, even if the result is “none;” and the requirements of CIP-003 that the registered entity have in place a cyber security policy and a designated, single senior manager with overall responsibility for leading the entity’s compliance with the CIP standards.) A “large” CIP audit compliance involves any entity with critical cyber assets and 5 requirements, auditing 43 requirements or 162 sub-requirements. These definitions are the same as used in Attachment 15 of the 2012 Business Plan and Budget filing. As can be seen from the table on page 5 and the bar charts on page 11, only SPP RE and Texas RE are planning any “small” on-site CIP audits in 2013 and all the Regional Entities are planning only “small” off-site CIP audits in 2013. Similar to the operational audits (note 2 above), this fact reflects that if there is a need to audit the registered entity’s compliance with 43 or more requirements or 162 or more sub-requirements of CIP standards, the Regional Entity will likely conclude that an on-site compliance audit should be conducted. The decision to conduct an on-site CIP audit can also be influenced by the need for the Regional Entity’s CIP audit staff to review facilities and equipment that are the subject of Technical Feasibility Exception (TFE) requests or audit the registered entity’s compliance with the terms of an approved TFE.

⁴ FTE = full-time equivalent employee. Each FTE is assumed to work 2,080 hours per year. An employee working less than 2,080 hours per year is counted as a fractional FTE based on number of hours divided by 2,080 hours.

The table on page 5 shows the following quantitative data for each Regional Entity based on its 2013 Business Plan and Budget. This data is used to develop the bar charts and trend line graphs that follow based on the Regional Entities' 2013 budgets.

- Numbers of registered entities
- Numbers of registered functions
- Total NEL (GWh)
- NEL (GWh) per registered entity
- Total ERO funding
- ERO (statutory) funding⁵ per registered entity
- ERO funding per registered function
- Total statutory budget
- Total statutory budget⁶ per registered entity
- Total statutory budget per registered function
- Total statutory FTE
- Registered entities per statutory FTE
- Registered functions per statutory FTE
- Total Compliance Program budget
- Compliance Program budget per registered entity
- Compliance Program budget per registered function
- Total Compliance FTE
- Registered entities per Compliance Program FTE
- Registered functions per Compliance Program FTE
- Projected numbers of small, medium and large on-site operational audits in 2013
- Estimated costs for small, medium and large on-site operational audits in 2013
- Projected numbers of small, medium and large off-site operational audits in 2013
- Estimated costs for small, medium and large off-site operational audits in 2013
- Projected numbers of small and large on-site CIP audits in 2013
- Estimated costs for small and large on-site CIP audits in 2013

⁵ ERO funding is defined as the sum of assessments and penalty sanctions.

⁶ Total budget is defined as the sum of total expenses and the total increase in fixed assets.

- Projected numbers of small and large off-site CIP audits in 2013
- Estimated costs of small and large off-site CIP audits in 2013
- Average number of contractors used and projected contractor costs for small, medium and large on-site operational audits
- Average number of contractors used and projected contractor costs for small, medium and large off-site operational audits

Metrics for Budget Submissions	FRCC	MRO⁷	NPCC⁷	RFirst	SERC	SPP	TRE	WECC⁸
Number of registered entities	70	125	292	351	248	136	216	459
Number of registered functions	244	502	577	701	697	401	427	1220
Total NEL (GWh)	223,902	282,954	653,432	913,289	1,043,110	218,273	335,000	856,313
NEL (GWh) per registered entity	3,199	2,264	2,238	2,602	4,206	1,605	1,551	1,866
Total ERO Funding ¹	\$ 6,262,471	\$ 9,112,927	\$ 12,649,564	\$ 17,205,648	\$ 13,880,878	\$ 9,525,074	\$ 9,001,520	\$ 17,877,734
ERO Funding per registered entity	\$ 89,464	\$ 72,903	\$ 43,320	\$ 49,019	\$ 55,971	\$ 70,037	\$ 41,674	\$ 38,949
ERO Funding per registered function	\$ 25,666	\$ 18,153	\$ 21,923	\$ 24,544	\$ 19,915	\$ 23,753	\$ 21,081	\$ 14,654
Total Budget ²	\$ 6,531,782	\$ 9,283,539	\$ 13,879,226	\$ 17,426,838	\$ 15,907,603	\$ 11,514,818	\$ 10,935,779	\$ 19,057,824
Total Budget per registered entity	\$ 93,311	\$ 74,268	\$ 47,532	\$ 49,649	\$ 64,144	\$ 84,668	\$ 50,629	\$ 41,520
Total Budget per registered function	\$ 26,770	\$ 18,493	\$ 24,054	\$ 24,860	\$ 22,823	\$ 28,715	\$ 25,611	\$ 15,621
Total Statutory FTE ³	30.12	37.75	35.86	73.00	77.45	34.50	60.00	112.30
Registered entity per Statutory FTE	2.32	3.31	8.14	4.81	3.20	3.94	3.60	4.09
Registered function per Statutory FTE	8.10	13.30	16.09	9.60	9.00	11.62	7.12	10.86
Total Compliance Budget ⁴	\$ 4,289,553	\$ 6,135,726	\$ 7,777,333	\$ 13,022,028	\$ 11,252,443	\$ 8,164,097	\$ 8,785,957	\$ 13,159,281
Compliance budget per registered entity	\$ 61,279	\$ 49,086	\$ 26,635	\$ 37,100	\$ 45,373	\$ 60,030	\$ 40,676	\$ 28,669
Compliance budget per registered function	\$ 17,580	\$ 12,223	\$ 13,479	\$ 18,576	\$ 16,144	\$ 20,359	\$ 20,576	\$ 10,786
Total Compliance FTE ³	17.93	18.99	15.00	43.00	41.50	22.25	40.00	50.50
Registered entity per Compliance FTE	3.90	6.58	19.47	8.16	5.98	6.11	5.40	9.09
Registered function per Compliance FTE	13.61	26.43	38.47	16.30	16.80	18.02	10.68	24.16
Number of Small Operational Audits Onsite ⁵	8		3		11			
Estimated Cost per Small Operational Audit Onsite ⁵	\$ 6,878		\$ 16,550		\$ 12,548			
Number of Medium Operational Audits Onsite ⁵	3	7	1	18	12		3	
Estimated Cost per Medium Operational Audit Onsite ⁵	\$ 17,194	\$ 25,007	\$ 41,580	\$ 35,794	\$ 17,436		\$ 36,341	
Number of Large Operational Audits Onsite ⁵	2	3	3		13	6	8	21
Estimated Cost per Large Operational Audit Onsite ⁵	\$ 34,388	\$ 35,679	\$ 64,200		\$ 36,625	\$ 53,231	\$ 53,925	\$ 45,471
Number of Small Operational Audits Offsite ⁵	1	3	20	58	4	5	13	48
Estimated Cost per Small Operational Audit Offsite ⁵	\$ 2,579	\$ 7,603	\$ 11,540	\$ 8,886	\$ 11,452	\$ 10,307	\$ 13,977	\$ 5,719
Number of Medium Operational Audits Offsite ⁵		5	15			18	11	36
Estimated Cost per Medium Operational Audit Offsite ⁵		\$ 19,007	\$ 14,765			\$ 23,146	\$ 26,988	\$ 15,090
Number of Large Operational Audits Offsite ⁵			25					9
Estimated Cost per Large Operational Audit Offsite ⁵			\$ 18,715					\$ 20,803
Number of Small CIP Audits Onsite ⁶						2	3	
Estimated Cost per Small CIP Audit Onsite ⁶						\$ 9,050	\$ 19,569	
Number of Large CIP Audits Onsite ⁶	2	10	3	19	8	4	12	20
Estimated Cost per Large CIP Audit Onsite ⁶	\$ 68,775	\$ 58,186	\$ 56,700	\$ 52,111	\$ 37,267	\$ 92,545	\$ 53,603	\$ 44,488
Number of Small CIP Audits Offsite ⁶	9	6	20	40	20	11	19	48
Estimated Cost per Small CIP Audit Offsite ⁶	\$ 2,579	\$ 19,007	\$ 21,270	\$ 3,451	\$ 6,994	\$ 4,550	\$ 13,977	\$ 3,931
Number of Large CIP Audits Offsite ⁶								
Estimated Cost per Large CIP Audit Offsite ⁶								
Avg. Number of Contractors Per Small Audits Onsite			2.0			1.0		0.0
Avg. Number of Contractors Per Medium Audits Onsite			4.0			3.0		0.0
Avg. Number of Contractors Per Large Audits Onsite			5.0			3.0		2.0
Avg. Number of Contractors Per Small Audits Offsite			1.0			1.0		1.0
Avg. Number of Contractors Per Medium Audits Offsite			1.0			2.0		1.5
Avg. Number of Contractors Per Large Audits Offsite			1.0			2.0		2.0
Cost of Contractors Per Small Audits Onsite			\$ 7,965			\$ -		\$ -
Cost of Contractors Per Medium Audits Onsite			\$ 19,980			\$ 8,873		\$ -
Cost of Contractors Per Large Audits Onsite			\$ 39,150			\$ 41,278		\$ 10,400
Cost of Contractors Per Small Audits Offsite			\$ 9,585			\$ 10,307		\$ 3,250
Cost of Contractors Per Medium Audits Offsite			\$ 12,555			\$ 9,199		\$ 9,750
Cost of Contractors Per Large Audits Offsite			\$ 16,335			\$ -		\$ 13,000

¹ ERO Funding is a sum of Assessments and Penalty Sanctions

² Total Budget is a sum of Total Expenses and Capital Expenditures

³ Each FTE that works 2,080 hours per year is counted as one FTE. An FTE working less than the 2,080 hours per year is counted as a fractional FTE

⁴ Total Compliance Budget is a sum of Direct Expenses, Indirect Expenses and Capital Expenditures

⁵ Size of Operational audits are defined by number of requirements:

Small	25 or less
Medium	26 to 75
Large	More than 75

⁶ Size of a CIP audit is defined as:

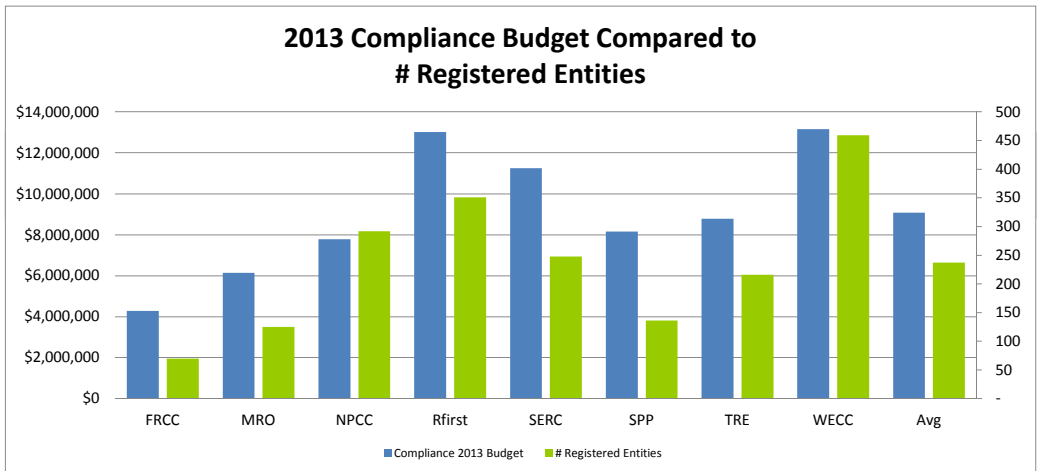
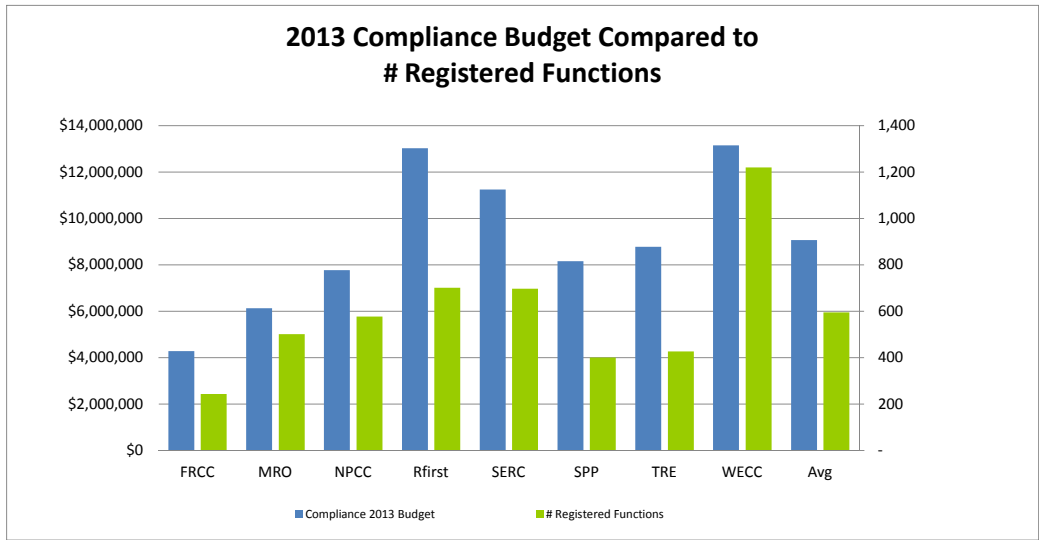
Small	Any entity with no critical cyber assets and 5 requirements
Large	Any entity with critical cyber assets and 5 requirements, auditing 43 requirements or 162 sub requirements

⁷ Due to the specifics of the compliance program included in the individual provincial MOUs for cross-border regional entities, some of these metrics are not directly comparable

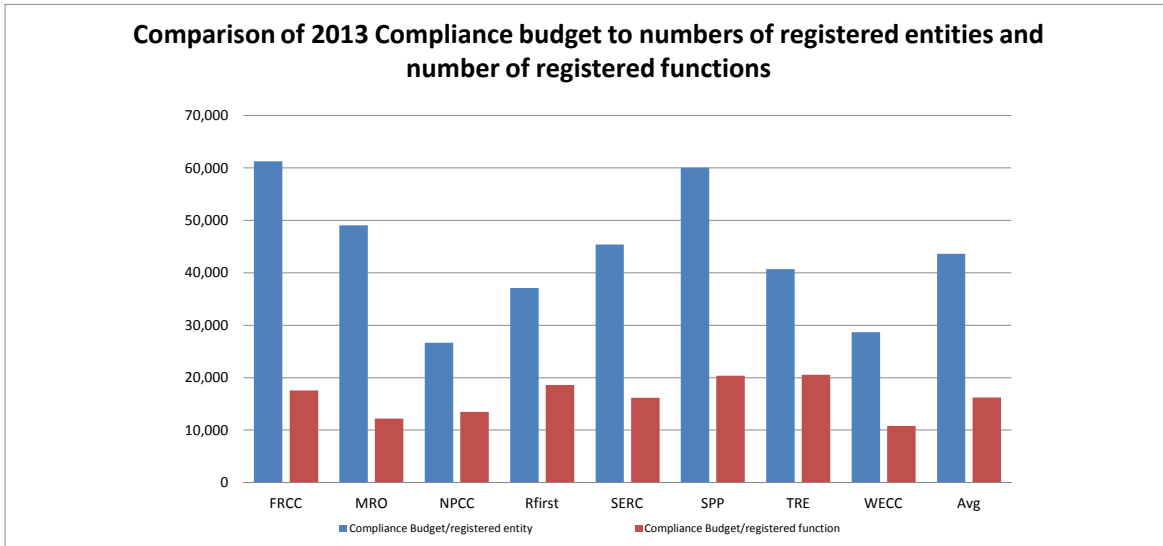
⁸ For WECC, the cost of the Reliability Coordinator function of \$26,051,663 has been deducted from the ERO assessments and Total Budget for comparison with the other Regions where no such function exists in Statutory Programs. 85.0 direct FTEs in the Reliability Coordinator function have been excluded from the calculations of registered entity per Statutory FTE and registered function per Statutory FTE. Also, the costs offset by grant funding totalling \$5,915,605 have been excluded from the Total Budget and 19.0 FTEs have been excluded from the calculations of registered entity per Statutory FTE and registered function per Statutory FTE.

Compliance 2013 Budget

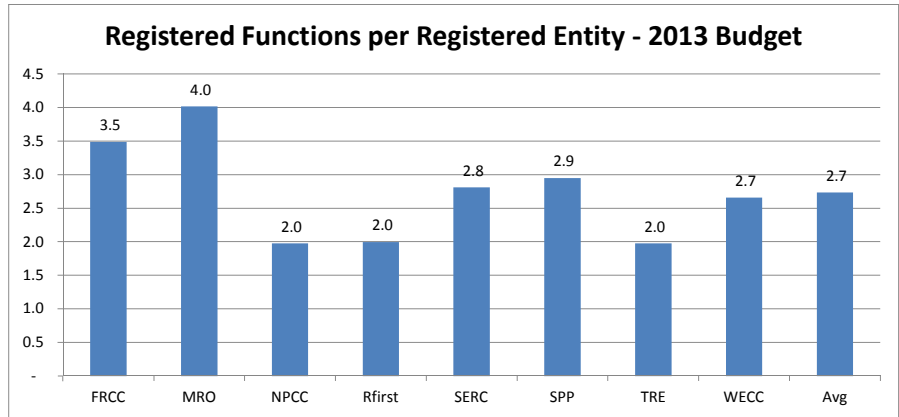
	FRCC	MRO	NPCC	Rfirst	SERC	SPP	TRE	WECC	Avg
Compliance 2013 Budget	4,289,553	6,135,726	7,777,333	13,022,028	11,252,443	8,164,097	8,785,957	13,159,281	9,073,302
# Registered Entities	70	125	292	351	248	136	216	459	237
# Registered Functions	244	502	577	701	697	401	427	1,220	596



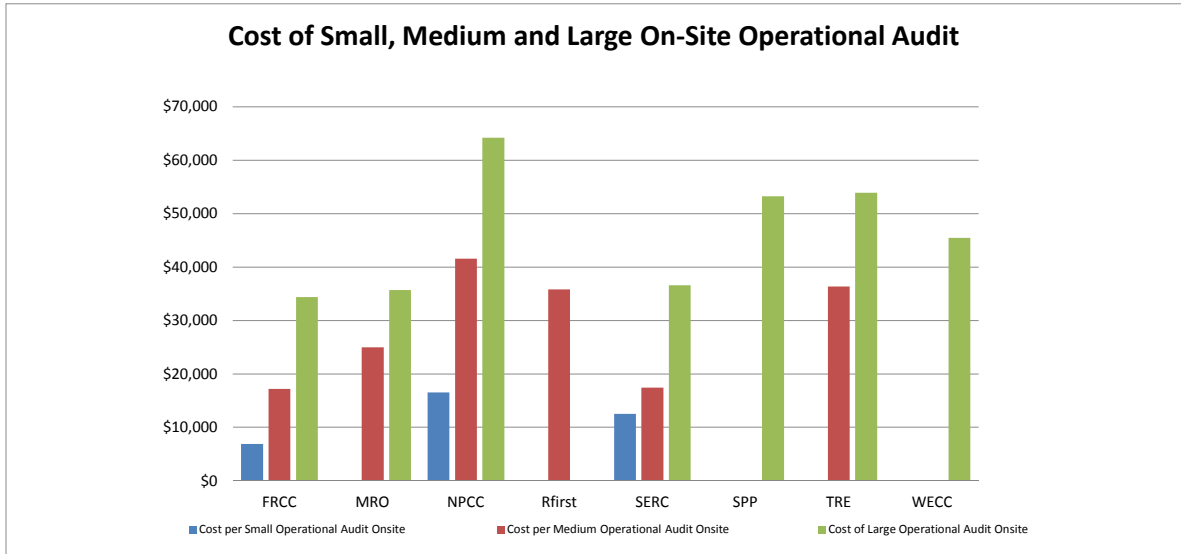
	FRCC	MRO	NPCC	Rfirst	SERC	SPP	TRE	WECC	Avg
Compliance Budget/registered entity	61,279	49,086	26,635	37,100	45,373	60,030	40,676	28,669	43,606
Compliance Budget/registered function	17,580	12,223	13,479	18,576	16,144	20,359	20,576	10,786	16,215



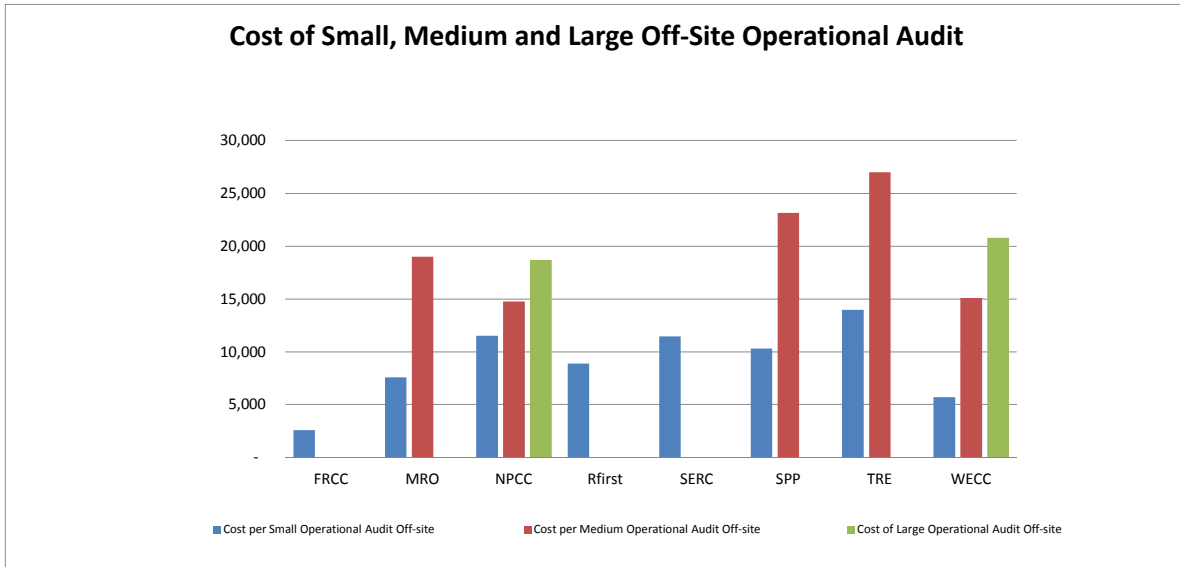
	FRCC	MRO	NPCC	Rfirst	SERC	SPP	TRE	WECC	Avg
Registered Functions per Registered Entity 2013 Budget	3.5	4.0	2.0	2.0	2.8	2.9	2.0	2.7	2.7
# Registered Entities per Compliance FTE	3.9	6.6	19.5	8.2	6.0	6.1	5.4	9.1	8.1
# Registered Functions per Compliance FTE	13.6	26.4	38.5	16.3	16.8	18.0	10.7	24.2	20.6



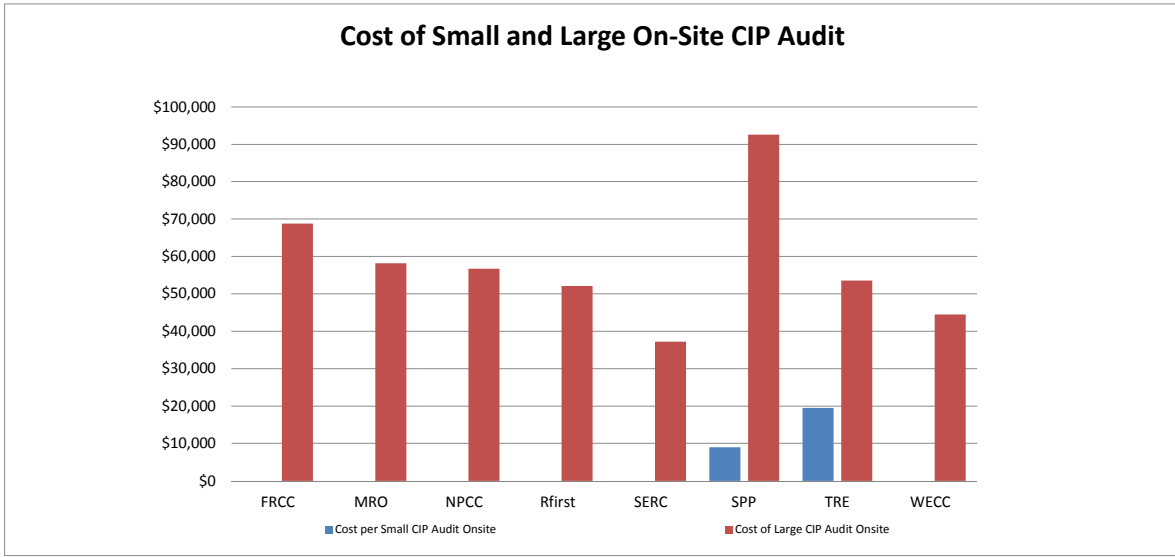
	FRCC	MRO	NPCC	Rfirst	SERC	SPP	TRE	WECC	Avg
Cost per Small Operational Audit Onsite	6,878		16,550		12,548				11,992
Cost per Medium Operational Audit Onsite	17,194	25,007	41,580	35,794	17,436		36,341		28,892
Cost of Large Operational Audit Onsite	34,388	35,679	64,200		36,625	53,231	53,925	45,471	46,217



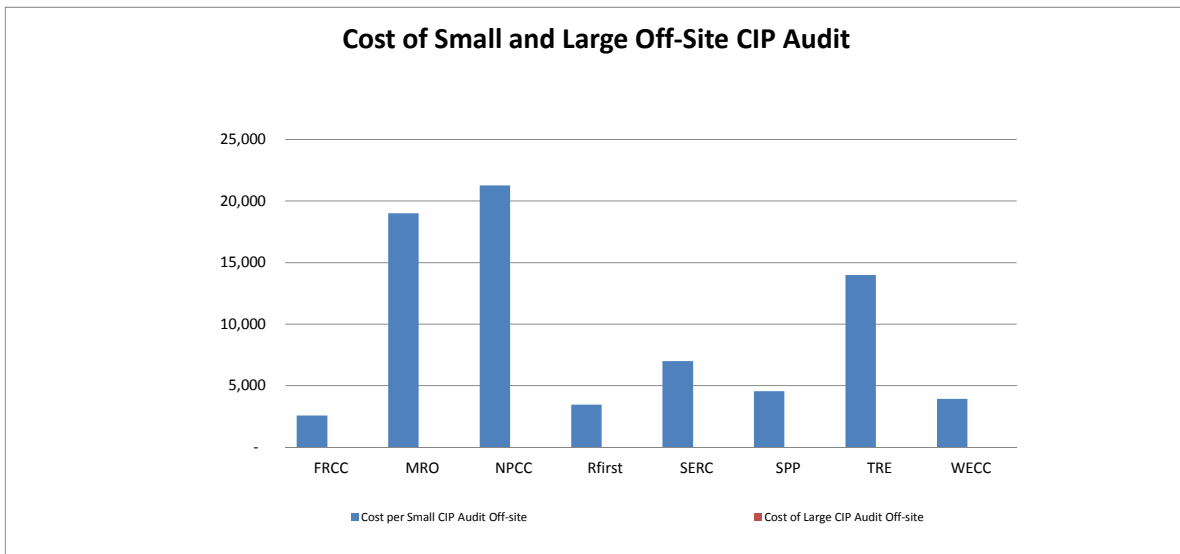
	FRCC	MRO	NPCC	Rfirst	SERC	SPP	TRE	WECC	Avg
Cost per Small Operational Audit Off-site	2,579	7,603	11,540	8,886	11,452	10,307	13,977	5,719	9,008
Cost per Medium Operational Audit Off-site		19,007	14,765			23,146	26,988	15,090	19,799
Cost of Large Operational Audit Off-site			18,715					20,803	19,759



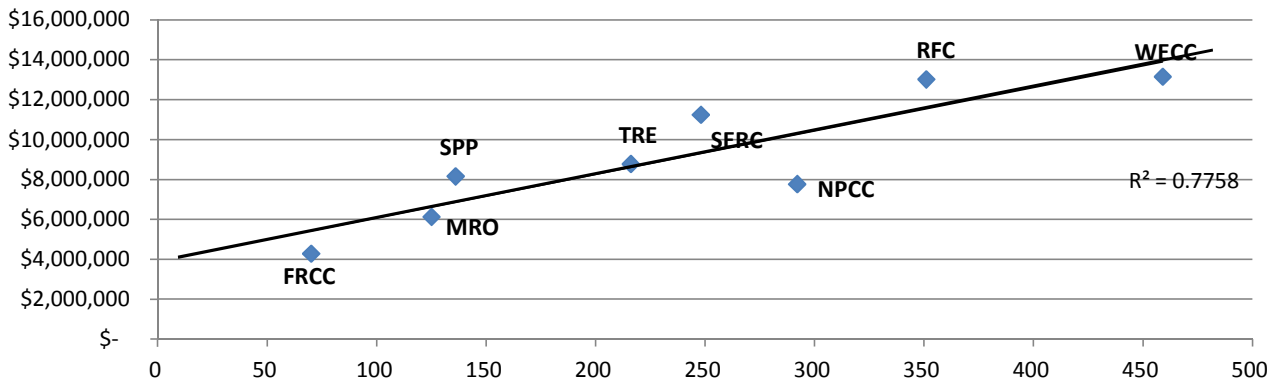
	FRCC	MRO	NPCC	Rfirst	SERC	SPP	TRE	WECC	Avg
Cost per Small CIP Audit Onsite						9,050	19,569		14,309
Cost of Large CIP Audit Onsite	68,775	58,186	56,700	52,111	37,267	92,545	53,603	44,488	57,959



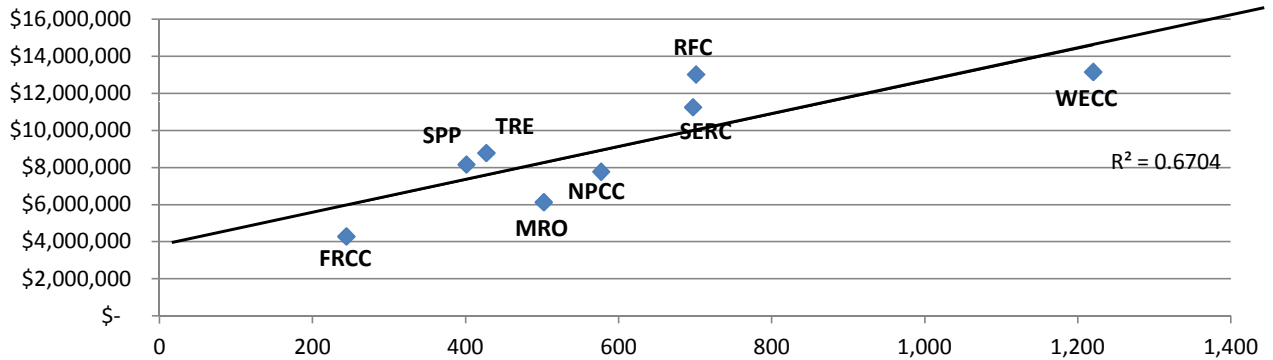
	FRCC	MRO	NPCC	Rfirst	SERC	SPP	TRE	WECC	Avg
Cost per Small CIP Audit Off-site	2,579	19,007	21,270	3,451	6,994	4,550	13,977	3,931	9,470
Cost of Large CIP Audit Off-site									-



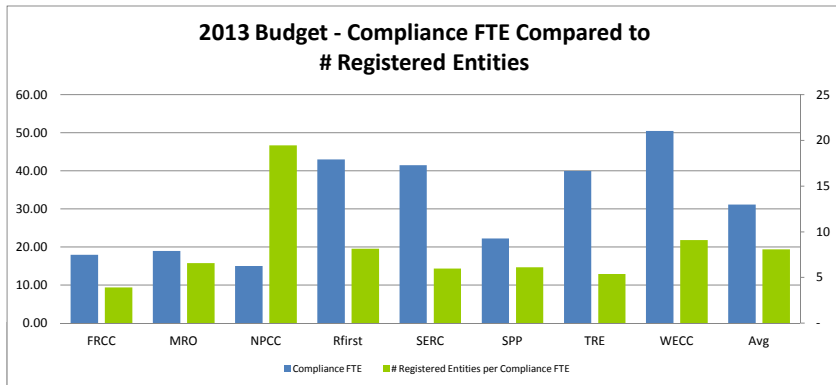
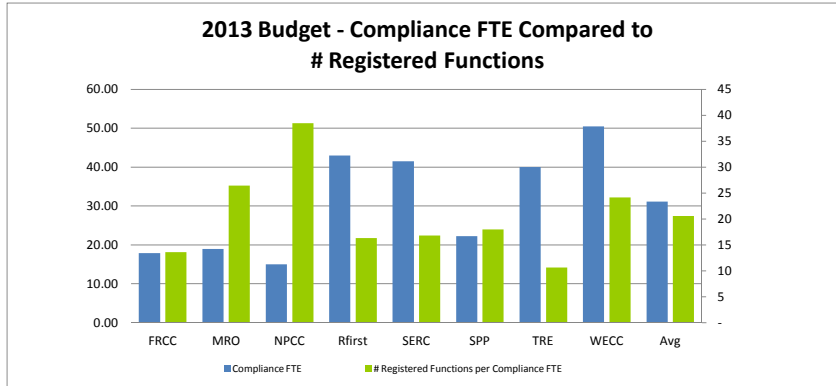
Regional Entity 2013 Compliance Program Budget as Function of Number of Registered Entities



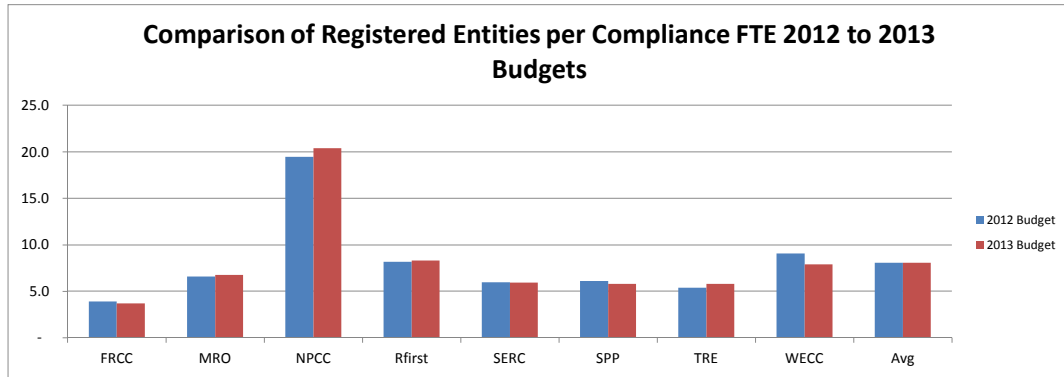
Regional Entity 2013 Compliance Program Budget as Function of Number of Registered Functions



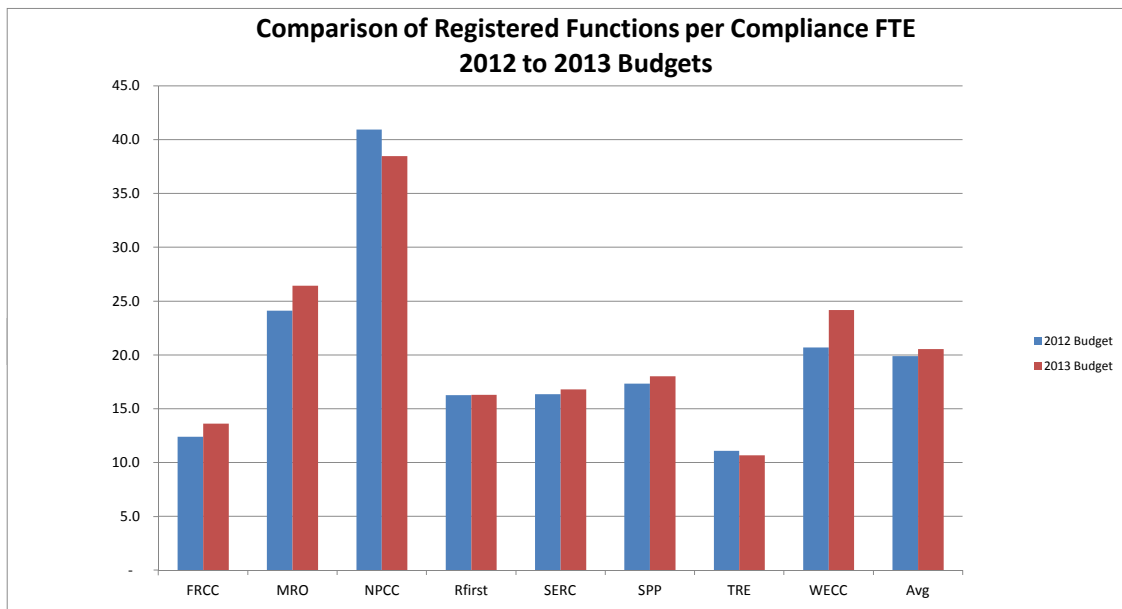
	FRCC	MRO	NPCC	Rfirst	SERC	SPP	TRE	WECC	Avg
Compliance FTE	17.93	18.99	15.00	43.00	41.50	22.25	40.00	50.50	31.15
# Registered Entities per Compliance FTE	3.9	6.6	19.5	8.2	6.0	6.1	5.4	9.1	8.1
# Registered Functions per Compliance FTE	13.6	26.4	38.5	16.3	16.8	18.0	10.7	24.2	20.6



	FRCC	MRO	NPCC	Rfirst	SERC	SPP	TRE	WECC	Avg
2012 Budget	3.9	6.6	19.5	8.2	6.0	6.1	5.4	9.1	8.1
2013 Budget	3.7	6.8	20.4	8.3	6.0	5.8	5.8	7.9	8.1



	FRCC	MRO	NPCC	Rfirst	SERC	SPP	TRE	WECC	Avg
2012 Budget	12.4	24.1	40.9	16.3	16.4	17.3	11.1	20.7	19.9
2013 Budget	13.6	26.4	38.5	16.3	16.8	18.0	10.7	24.2	20.6



Discussion and Analysis

Metrics Based on 2013 Regional Entity Budgets

The development, collection, analysis and comparison of Regional Entity Compliance Program metrics data continues to be a complicated and time-consuming process, requiring careful consideration of many complex factors. In analyzing the Regional Entity metrics based on their 2013 budgets, NERC has in a number of instances looked at the average value among the Regional Entities for the metric, as well as the range of the individual values around the average. This data has been considered as part of the effort to understand and explain the differences among the Regional Entities' budgeted values, and not because NERC believes the deviation from an average, standing alone, is a measure of an individual Regional Entity's efficiency or effectiveness.

The Regional Entity metrics provided in this Attachment, based on the Regional Entities' 2013 Business Plans and Budgets, continue to show, in general, that the Regional Entities with the larger numbers of registered entities and registered functions have the larger Compliance Program budgets. The bar charts and accompanying data on page 6 of this Attachment depict the relative positions of the Regional Entities with respect to (i) total Compliance Program budget and (ii) numbers of registered entities and registered functions.⁷ Two exceptions to this relationship (*i.e.*, that more registered entities and more registered functions means a larger Compliance Program budget) are (i) NPCC, which has a smaller Compliance Program budget than its rank order position in terms of numbers of registered entities and registered functions would suggest, and (ii) SPP RE, which has a larger Compliance Program budget than its rank order position in terms of numbers of registered entities and registered functions would suggest. NPCC has the third highest number of registered entities and the fifth highest number of registered functions, but NPCC's Compliance Program budget is the third lowest of the eight Regional Entities. This is due to the reduced scope of compliance activities in the Canadian Provinces that are part of the NPCC Region, as governed by the Memoranda of Understanding between NPCC and the Canadian Provinces of Ontario, Québec, New Brunswick and Nova Scotia. SPP has the third lowest number of registered entities and second lowest number of registered functions, but the fifth highest Compliance Program budget. Although the difference between SPP's rank order as to numbers of registered entities and registered functions and its rank order as to total Compliance Program budget is not significant, it is likely due primarily to SPP's unique method of obtaining administrative services and budgeting and recording indirect costs.

The bar chart and accompanying data on page 7 of this Attachment show the 2013 Compliance Program budget per registered entity and per registered function for each Regional Entity. There are variations among the Regional Entities with respect to Compliance Program budget per registered entity and Compliance Program budget per registered function. The average of the Regional Entity values for Compliance Program budget per registered function is

⁷ The data on numbers of registered entities and registered functions in each Region used in the 2013 budget metrics are as of March, 2012 for MRO; May, 2012 for NPCC; August, 2012 for SPP RE; and July, 2012 for the other five Regions.

\$16,215 (a very slight reduction from this average based on the 2012 Budgets); the two highest values (Texas RE - \$20,576 and SPP RE - \$20,359) are approximately 126% of the average while the lowest value (WECC - \$10,786) is 66% of the average. Note that WECC's value for this metric is considerably lower than the next lowest value (MRO - \$12,223). With respect to Compliance Program budget per registered entity, the average for the Regional Entities is \$43,606 (again, a very slight reduction of the average from the 2012 Budgets); the two highest values (FRCC - \$61,279 and SPP RE - \$60,030) are approximately 138% - 140% of the average; and the lowest value (NPCC - \$26,635) is 61% of the average.⁸

As noted, FRCC and SPP RE have the two highest values for Compliance Program budget per registered entity, and Texas RE and SPP RE have the two highest values for Compliance Program budget per registered function. At the same time, FRCC, SPP RE and Texas RE have three of the four lowest totals of registered entities, and the three lowest totals of registered functions, among the eight Regional Entities. At the other end of the spectrum, WECC has the lowest values among the Regional Entities for Compliance Program budget per registered function and the second lowest value for Compliance Program budget per registered entity (only NPCC has lower value for Compliance Program budget per registered entity), and WECC has (by far) the highest numbers of registered entities and registered functions in its Region of all the Regional Entities. These data indicate, again (as indicated by these metrics as presented in previous years' business plan and budget filings), and in general, that there are economies of scale in Compliance Program operations and costs.

The graphs on page 12 of this Attachment, which display the results of two simple least-squares regression analyses using the Regional Entities' 2013 budgets, help to further illustrate the relationship between numbers of registered entities and registered functions, on the one hand, and total Compliance Program budget, on the other hand. Each Regional Entity's 2013 Compliance Program budget has been plotted against its number of registered entities, and its number of registered functions. On each of these charts, a linear trend line has been drawn based on the data points, and the correlation coefficient (R^2) of the data points is indicated. There is a greater disparity between the R^2 value for the plot based on number of registered entities (0.7758) and the R^2 value for the plot based on number of registered functions (0.6704) than seen in this analysis in the previous two years' Business Plan and Budget filings.⁹ Nonetheless,

⁸ There is a variation among the Regional Entities in terms of registered functions per registered entity, ranging from a high value of 4.0 registered functions per registered entity for MRO to a low value of 2.0 registered functions per registered entity for NPCC, ReliabilityFirst and Texas RE. The overall average is 2.7 registered functions per registered entity. (See the data lines on page 8.) The values of this metric for each Regional Entity are generally consistent with the values based on the 2011 and 2012 Business Plans and Budgets – not surprisingly, neither the average nor the values of this metric for the individual Regional Entities have changed significantly. There is not an obvious reason why some Regional Entities (MRO and FRCC) have 1.75 to 2.0 times more registered functions per registered entity than do other Regional Entities (NPCC, Texas RE and ReliabilityFirst).

⁹ In the regression analysis that was provided in Attachment 15 of the 2011 Business Plan and Budget filing, the R^2 value for the plot based on number of registered functions was 0.8544 while the R^2 value for the plot based on number of registered entities was 0.8958. In the regression

NERC continues to believe that the regression analyses continue to indicate that neither number of registered entities or number of registered functions is a significantly better predictor of a Regional Entity's total Compliance Program budget than the other number. Further, a visual inspection of the two graphs shows that the data point for each Regional Entity is at approximately the same point relative to the trend line on both graphs. Specifically, the data points for FRCC, MRO, NPCC and WECC are on or below the trend line on both graphs, and the data points for SPP RE, Texas RE, SERC and ReliabilityFirst are on or above the trend line on both graphs. (These are the same positional relationships for the individual Regional Entities that were shown in the regression plots provided in Attachment 15 of the 2012 Business Plan and Budget filing). Finally, the fact that the y-intercept for each trend line is significantly greater than zero is a further indication that a simple comparison of the individual Regional Entity values to an average is not a strong indicator of relative efficiencies of the Regional Entities in their Compliance Programs.

The bar charts and accompanying data lines on page 13 of this Attachment show the numbers of registered functions per Compliance Program FTE and registered entities per Compliance Program FTE for each Regional Entity, based on the 2013 budgets. The average for the eight Regional Entities for numbers of registered entities per Compliance Program FTE is 8.1 (identical to the average (8.1) based on the 2012 budgets); the lowest value (FRCC – 3.9) is 48% of the average and the highest value (NPCC – 19.5) is 241% of the average. This is a slightly tighter range of values around the average than was the case for the 2012 Budget. The average for numbers of registered functions per Compliance Program FTE is 20.6 (a 3.4% reduction from the average based on the 2012 budgets); the lowest value (Texas RE – 10.7) is 52% of the average and the highest value (NPCC – 38.5) is 187% of the average. This is also a slightly tighter range of values around the average than was the case for the 2012 Budget.

The bar charts and accompanying data lines on page 14 of this Attachment provide a comparison of the metrics for registered entities per Compliance Program FTE and registered functions per Compliance Program FTE, for each Regional Entity, based on the 2013 budgets, to the values of these metrics based on the Regional Entities' 2012 budgets as provided in the 2012 Business Plan and Budget filing. With respect to registered entities per Compliance Program FTE, as noted earlier, the averages based on the 2012 Budgets and the 2013 Budgets are the same (8.1). The values of this metric have increased from the 2012 Budget to the 2013 Budget for MRO, NPCC, ReliabilityFirst and Texas RE (*i.e.*, these Regional Entities now have more registered entities per Compliance Program FTE than in their 2012 budgets), while the values for this metric have decreased from the 2012 budgets for FRCC, SPP RE and WECC (*i.e.*, these Regional Entities now have fewer registered entities per Compliance Program FTE than in their 2012 budgets). The value for SERC based on its 2012 and 2013 budgets is the same. With respect to registered functions per Compliance Program FTE, the 2013 budget values of this metric are higher than the 2012 budget values for FRCC, MRO, SERC, SPP RE and WECC (*i.e.*, these Regional Entities each now has more registered functions per Compliance Program FTE than its 2012 budget), while the 2013 budget values of this metric are lower than the 2012 budget

analysis that was provided in Attachment 15 of the 2012 Business Plan and Budget filing, the R^2 value for the plot based on number of registered functions was 0.7126 while the R^2 value for the plot based on number of registered entities was 0.725.

values for NPCC and Texas RE (*i.e.*, NPCC and Texas RE now have fewer registered functions per Compliance Program FTE than in their 2012 budgets). The value for ReliabilityFirst based on its 2012 and 2013 budgets is the same. However, with the exception of WECC, the change in the value of these metrics for the individual Regional Entities from their 2012 budgets to their 2013 budgets is generally 7 percent or less for number of registered entities per Compliance Program FTE and is generally 10 percent or less for number of registered functions per Compliance Program FTE. This observation is consistent with the facts that (1) six years after NERC was certified as the ERO, the population of registered entities and registered functions is fairly mature (*i.e.*, for the most part, the users, owners, and operators of the bulk power system that should be registered, have been registered, and for the relevant reliability functions¹⁰), and (2) the Regional Entities have significantly grown their Compliance Program staffs over time and are not planning significant staffing changes for their Compliance Programs in their 2013 budgets as compared to their 2012 budgets. For WECC, the change in its values from its 2012 budget to its 2013 budget is inconclusive: the decrease in registered entities per Compliance Program FTE indicates more compliance resources per FTE, but the increase in registered functions per Compliance Program FTE indicates fewer Compliance Program resources per registered function.¹¹

The bar charts and accompanying data lines on pages 9 through 11 of this Attachment provide the Regional Entities' estimated costs for 2013 to perform each type (operational and CIP; on-site and off-site) and size category of compliance audit.¹² The estimated costs to perform a compliance audit include the costs to prepare for the audit (including review of the registered entity's completed pre-audit questionnaire and Reliability Standards Audit Worksheets (RSAWs) and other registered entity-provided documents and information, and any pre-audit meetings), to perform the audit (whether on-site or off-site), and to report the results of the audit. Costs incurred in issuing and processing notices of alleged violations and proposed penalties resulting from the compliance audit are not included in the estimated cost to perform the compliance audit. The costs per audit for each category of audit, shown in the table on page 5 and the bar charts on pages 9-11, are based on the Regional Entities' estimates of the man-hours required to complete the preparation, performance and reporting functions for each category of compliance audit in 2013. The costs include the direct Salary expense and related Personnel Expense (Payroll Taxes, Benefits and Retirement Costs) for the man-hours of the Regional Entity personnel involved in preparation, performance and reporting for the audit and/or the costs for consultant/contractor resources used by the Regional Entity to perform the audit, but do not include any allocation of Regional Entity indirect costs. The costs also include Travel Expense for personnel in connection with on-site audits at the registered entity's location.

¹⁰ It is possible that adoption of the proposed revised Bulk Electric System definition and exception procedure, presently pending before the Commission in Docket Nos. RM12-6-000 and RM12-7-000, will result in some changes in registrations, at least in some Regions.

¹¹ These two metrics, however, do not capture other Compliance Program resources, most notably contractor or consultant support, nor support that other departments (such as Legal and Regulatory) may provide to the Regional Entities' Compliance Programs.

¹² Estimated costs of a particular size or type of audit are not provided in the table on page 5 or in the applicable bar chart on pages 9-11 if no audits are planned.

NERC and the Regional Entities note the following factors, among others, that can contribute to the differences in estimated costs per compliance audit among the Regional Entities for the various compliance audit size and site categories, as reported in the table on page 5 and shown in the bar charts on pages 9-11:

- Some Regional Entities are using consultants or contractors on their audit teams, which may entail a higher cost per hour than the use of Regional Entity employees.¹³ For example, as shown on the table on page 5, NPCC, SPP RE and WECC are planning on the use of contractors in compliance audits in 2013. (NERC observes, however, that in general and over time, as the Regional Entities have continued to build their Compliance Program staffs, they have been able to reduce their use of consultants or contractors in compliance audits. An exception is where very specialized subject matter expertise is required and there may not be cost justification for maintaining that expertise on staff in FTE positions.)
- The Regional Entity's footprint may affect the extent to which travel costs must be incurred in the performance of on-site compliance audits within the Region.
- Although consistent definitions of "large" operational and CIP audits have been used, *i.e.*, an operational audit encompassing more than 75 reliability standards requirements and a CIP audit encompassing more than 43 CIP standards requirements or 162 sub-requirements), some Regional Entities may project a greater number of requirements to be audited in a typical "large" compliance audit than other Regional Entities. A Regional Entity that projects a larger number of requirements to be audited in a "large" audit would, all other things equal, estimate a greater amount of resources to conduct its "large" audit (*e.g.*, more auditors, more days at the registered entity's site and/or more man-hours to review the registered entity's documentation and to prepare the audit report).
- Some Regional Entities may simply be planning more steps, or budgeting higher man-hours, for the preparation, completion and/or reporting phases of their compliance audits. In particular, there may be variations in the levels of activity and man-hours budgeted by the Regional Entities for review of registered entity responses to pre-audit questionnaires and RSAWs, and other registered entity documents and information, prior to the on-site phase of a compliance audit.
- With respect to CIP compliance audits, as noted earlier, the need to examine equipment or facilities that are the subject of one or more TFE Requests or to audit

¹³ It should be noted that although the cost to use a contractor or consultant on an individual audit assignment may be more costly than using a Regional Entity employee, the annual cost to the Regional Entity of retaining a contractor or consultant for a specific targeted assignment such as participating in certain compliance audits may be less than the cost of maintaining a FTE employee on staff for the year.

the registered entity's compliance with one or more approved TFEs complicates the difficulty of projecting the resource requirements for a CIP audit.

In addition to these factors, differences in estimated costs per audit among Regional Entities may reflect general differences in the market compensation levels in the different areas of the U.S. in which the various Regional Entities operate, thereby impacting their respective overall Personnel Expenses.

In conclusion, NERC reiterates that the development, collection, analysis and comparison of metrics on the Regional Entities' costs, operations and performance is an ongoing process. NERC and the Regional Entities will continue to work collaboratively to refine the metrics and improve their analysis of the reported metrics values and the factors that may cause variations in values among the Regional Entities; and will continue to report the results of these analyses in future annual Business Plan and Budget filings.

DOCKET NO. RR12-__-000

**NORTH AMERICAN ELECTRIC RELIABILITY
CORPORATION**

2013 BUSINESS PLAN AND BUDGET FILING

ATTACHMENT 8

METRICS ON NERC AND REGIONAL ENTITY

ADMINISTRATIVE (INDIRECT) COSTS

BASED ON

THE 2012 AND 2013 BUDGETS

ATTACHMENT 16

Analysis of NERC and Regional Entity Budgeted Indirect (Administrative Services) Costs 2013 Budgets versus 2012 Budgets

In the preparation of the NERC and Regional Entity 2013 Business Plans and Budgets, indirect expenses have been defined as those expenses which cannot be directly attributed to one of the statutory program functions.¹

The metrics presented in the tables on the last page of this Attachment are the same metrics presented in Attachment 16 to the 2010, 2011 and 2012 Business Plan and Budget filings. These tables provide several metrics comparing indirect costs and FTEs² in relation to total statutory costs and FTEs and direct statutory costs and FTEs, for NERC and each of the Regional Entities, in their 2013 Business Plans and Budgets and their 2012 Business Plans and Budgets.

Overall, the tables show an increase in the average indirect costs as a percent of total statutory costs and a slight increase in the average statutory indirect FTEs as a percentage of total statutory FTEs, in the NERC and Regional Entity 2013 budgets as compared to the 2012 budgets. This result is reflective of consistent application of the definition of indirect costs, as described above, in the preparation of the 2013 budgets.

Following is discussion of the individual metrics presented in the tables.

Percent of Statutory Indirect Budget to Total Statutory Budget

For NERC and the Regional Entities, the average percent of Statutory Indirect Budget to Total Statutory Budget (top row of tables) in the 2013 budgets is 32.3%, versus 28.8% in the 2012 budgets. For 2013, NPCC, ReliabilityFirst, SERC and Texas RE show percentages close to the overall average. NPCC's percentage is significantly higher than its percentage in 2012 due to a change in the methodology used by NPCC for allocating Administrative Services costs to the statutory programs. In 2012, NPCC allocated certain indirect costs, such as Rent and Office Costs, to the statutory programs as direct expenses. In 2013, NPCC is allocating all administrative services costs as indirect expenses based on the proportional number of FTEs in each statutory program compared to all statutory programs (which is consistent with the methodology used by NERC and other Regional Entities), resulting in a percentage of Statutory Indirect Budget to Total Statutory Budget for NPCC that is close to the average for NERC and all the Regional Entities. Thus, although the 2012 and 2013 values of this metric for NPCC would seem to indicate a significant increase in its statutory indirect costs as a portion of its total budget, in fact the increase is the result of NPCC using an allocation methodology that is more consistent with that used by NERC and other Regional

¹ NERC and Regional Entity provisions for Working Capital Reserve are not included in the budget data used to calculate these metrics.

² FTE = Full-time equivalent employee.

Entities, resulting in NPCC's 2013 metric for Statutory Indirect Budget as a percent of Total Statutory Budget being consistent with the overall average.

FRCC's percentages for this metric are considerably lower than the overall average, which is reflective of the methodology used by FRCC to identify and allocate staff time and Office Costs to the appropriate program. WECC's percentage for this metric is significantly higher than its percentage in 2012, but moderately lower than the overall average for 2013, which reflects a reduction of components of statutory direct costs associated with significant federal grant activity in WECC's 2013 budget compared to its 2012 budget, which are not accompanied by corresponding reductions in indirect costs. Funding and associated activities under certain federal grants received by WECC and reflected in its 2010, 2011 and 2012 budgets have been completed or are completing during in 2013. SPP RE continues to have a higher percentage than the average (the highest percentage among the Regional Entities) for this metric, reflecting the allocation of indirect costs (support services charges) from SPP, Inc., which are driven by SPP, Inc.'s operating budget. SPP RE's percentage of Statutory Indirect Costs to Total Statutory Budget is slightly lower in 2013 than in 2012 due to a reduction in SPP RE's Budgeted Indirect FTEs as a Percent of Budgeted Total FTEs and a reduction in the rate charged for support services allocated from SPP, Inc., from \$71.04 in its 2012 Budget to \$67.35 in its 2013 Budget.

The 2013 percentages for NERC and MRO are higher than the average, and are higher than their 2012 percentages for this metric, due to an increase in their Budgeted Indirect FTEs as a Percent of Budgeted Total FTEs, as further described below. For NERC, the increase in this metric is also due to a higher Statutory Indirect Budget resulting from: (i) an increase in rent expense associated with NERC's offices in Atlanta and Washington, D.C., due to taking more rented space at the Atlanta office and rent increases under the terms of both leases; (ii) an increase in budgeted professional services for 2013 associated with initiation of the five-year ERO performance assessment; and (iii) budgeted increases in contract and consulting expenses and fixed asset purchases for new IT infrastructure. For MRO, the increase in this metric is also related to higher Office Rent expense due to a full year's rent for the new office facility MRO moved into during 2012, and higher budgeted professional services fees for independent board members who are being added to the MRO Board in 2013 pursuant to a Bylaws amendment approved by the Commission in 2012.

For NERC, MRO, NPCC, SERC, and WECC, their percentages of Statutory Indirect Budget to Total Statutory Budget increased in their 2013 budgets from the percentages based on their 2012 budgets, ranging from an increase of 1.2 percentage points for SERC to an increase of 19.4 percentage points for NPCC. FRCC, ReliabilityFirst and SPP RE show decreases in this metric from their 2012 budgets, ranging from a decrease of 0.6 percentage points for FRCC to decrease of 3.1 percentage points for ReliabilityFirst. Texas RE's percentage of Statutory Indirect Budget to Total Statutory Budget was virtually unchanged, with an increase of 0.1 percentage points.

The overall average for the ratio of Statutory Direct Budget to Statutory Indirect Budget decreased from 3.31 based on the 2012 Business Plans and Budgets to 2.74 based in

the 2013 Business Plans and Budgets. This change is consistent with the change in the overall average for Total Statutory Indirect Budget as a Percent of Total Statutory Budget.

Budgeted Indirect FTEs as a Percent of Budgeted Total FTEs

In the NERC and Regional Entity 2013 Business Plans and Budgets, on average the budgeted statutory indirect FTEs are 21.5% of total statutory FTEs, compared to an average of 20.2% for the 2012 budgets, an increase of 1.3 percentage points (second row of tables). On average, there are 4.32 statutory direct FTEs per statutory indirect FTE in the 2013 budgets, compared to 4.39 statutory direct FTEs per statutory indirect FTEs in the 2012 budgets, for an average decrease of 0.07 statutory direct FTEs per statutory indirect FTE. The small changes in these two metrics from 2012 to 2013 compare to similarly small changes from 2011 to 2012, when the average budgeted statutory indirect FTEs as a percent of total budgeted FTEs decreased 0.5 percentage points from 20.7% to 20.2%, and the average number of statutory direct FTEs per statutory indirect FTE increased by 0.31, from 4.08 to 4.39. Thus, these metrics continue to demonstrate that NERC and the Regional Entities are achieving an operational balance between statutory direct FTEs and indirect FTEs.

NERC, MRO, NPCC, SERC and WECC have higher percentages of budgeted statutory indirect FTEs to total statutory FTEs reflected in their 2013 budgets than in their 2012 budgets. FRCC, ReliabilityFirst, SPP RE and Texas RE have lower percentages of budgeted statutory indirect FTEs to total statutory FTEs reflected in their 2013 budgets than in their 2012 budgets. SPP RE continues to have a very low percentage (the lowest percentage among the Regional Entities) of indirect statutory FTEs to total statutory FTEs, which reflects the fact that SPP RE has a very small staff of indirect FTEs and obtains many of its administrative services from SPP, Inc.

Statutory Indirect Budget per Total FTE

The Statutory Indirect Budget per Total FTEs has increased from an average of \$77,618 in the 2012 NERC and Regional Entity budgets to \$87,510 in the 2013 budgets, an increase of \$9,892, or 12.7% (bottom row of tables). The statutory Indirect Budget per Total FTEs for NPCC increased significantly due primarily to NPCC's change in methodology of allocating indirect costs to the statutory programs, as previously described. If NPCC were removed from the 2012 and 2013 calculations of this metric, the overall averages would be \$79,618 for 2012 and \$81,336 for 2013, a 2.2% increase. This indicates that the seemingly large increase in Statutory Indirect Budget per Total FTE from 2012 to 2013 is largely driven by NPCC's change in allocation methodology, not by actual increases in NERC's and the Regional Entities' budgeted indirect costs. The increases in the statutory Indirect Budget per Total FTEs for NERC, MRO, SERC and WECC is reflective of their increased percentages of Statutory Indirect Budget to Total Statutory and their increased percentages of Indirect FTEs to Total FTEs as described above, and range from 0.7% for SERC to 11.4% for NERC. The statutory Indirect Budget per Total FTEs metric is decreasing from 2012 to 2013 for FRCC, ReliabilityFirst and SPP RE, by between 2.0% for FRCC to 5.7% for ReliabilityFirst. Texas RE's 2013 value for Statutory Indirect Budget per Total FTEs did not change from 2012.

**Analysis of Indirect (Administrative Services) Costs
2013 Budget versus 2012 Budget**

2012 BUDGET					2013 BUDGET					
Total Statutory Budget	Total Statutory Direct Budget	Total Statutory Indirect Budget	% Statutory Indirect Budget to Total Statutory	Ratio of	Total Statutory Budget	Total Statutory Direct Budget	Total Statutory Indirect Budget	% Statutory Indirect Budget to Total Statutory	Ratio of	
				Statutory Direct Budget to Indirect Budget					Statutory Direct Budget to Indirect Budget	
\$ 53,112,272	\$ 33,189,444	\$ 19,922,828	37.5%	1.67	NERC	\$ 54,286,256	30,909,401	23,376,855	43.1%	1.32
6,394,454	5,697,287	697,167	10.9%	8.17	FRCC	6,531,782	5,861,218	670,564	10.3%	8.74
9,057,229	5,636,696	3,420,533	37.8%	1.65	MRO	9,283,539	5,558,189	3,725,350	40.1%	1.49
13,680,644	11,488,152	2,192,492	16.0%	5.24	NPCC	13,879,226	8,969,958	4,909,268	35.4%	1.83
16,656,499	11,371,965	5,284,534	31.7%	2.15	ReliabilityFirst	17,426,838	12,443,206	4,983,632	28.6%	2.50
15,594,445	10,423,575	5,170,870	33.2%	2.02	SERC	15,907,603	10,433,393	5,474,210	34.4%	1.91
11,410,642	5,907,059	5,503,583	48.2%	1.07	SPP RE	11,514,817	6,064,830	5,449,987	47.3%	1.11
10,613,458	7,694,168	2,919,290	27.5%	2.64	Texas RE	10,935,780	7,916,802	3,018,978	27.6%	2.62
67,969,167	56,956,789	11,012,378	16.2%	5.17	WECC	51,025,093	38,697,715	12,327,378	24.2%	3.14
				28.8%	3.31	AVERAGE			32.3%	2.74

2012 BUDGETED FTEs					2013 BUDGETED FTEs					
Total Statutory FTEs	Total Statutory Direct FTEs	Total Statutory Indirect FTEs	Indirect FTE as % of Total FTE	# Direct to	Total Statutory FTEs	Total Statutory Direct FTEs	Total Statutory Indirect FTEs	Indirect FTE as % of Total FTE	# Direct to	
				Indirect Statutory FTEs					Indirect Statutory FTEs	
176.75	129.00	47.75	27.0%	2.70	NERC	186.25	133.50	52.75	28.3%	2.53
30.69	26.67	4.02	13.1%	6.63	FRCC	30.12	26.37	3.75	12.5%	7.03
37.00	29.15	7.85	21.2%	3.71	MRO	37.75	27.75	10.00	26.5%	2.78
35.43	27.00	8.43	23.8%	3.20	NPCC	35.86	26.86	9.00	25.1%	2.98
73.00	56.70	16.30	22.3%	3.48	ReliabilityFirst	73.00	57.20	15.80	21.6%	3.62
73.70	56.95	16.75	22.7%	3.40	SERC	77.45	57.52	19.93	25.7%	2.89
33.50	30.00	3.50	10.4%	8.57	SPP RE	34.50	31.25	3.25	9.4%	9.62
58.00	47.25	10.75	18.5%	4.40	Texas RE	60.00	49.25	10.75	17.9%	4.58
213.30	165.00	48.30	22.6%	3.42	WECC	216.30	160.10	56.20	26.0%	2.85
				20.2%	4.39	AVERAGE			21.5%	4.32

2012 BUDGET per FTE				2013 BUDGET per FTE				
Total Statutory	Total Statutory Direct	Total Statutory Indirect	Statutory Indirect	Total Statutory	Total Statutory Direct	Total Statutory Indirect	Statutory Indirect	
			Budget per Total FTE				Budget per Total FTE	
\$ 300,494	\$ 257,283	\$ 417,232	\$ 112,718	NERC	\$ 291,470	\$ 231,531	\$ 443,163	\$ 125,513
208,356	213,622	173,425	22,716	FRCC	216,859	222,268	178,817	22,263
244,790	193,369	435,737	92,447	MRO	245,922	200,295	372,535	98,685
386,132	425,487	260,082	61,882	NPCC	387,039	333,952	545,474	136,901
228,171	200,564	324,205	72,391	ReliabilityFirst	238,724	217,539	315,420	68,269
211,594	183,030	308,709	70,161	SERC	205,392	181,387	274,672	70,681
340,616	196,902	1,572,452	164,286	SPP RE	333,763	194,075	1,676,919	157,971
182,991	162,840	271,562	50,333	Texas RE	182,263	160,747	280,835	50,316
318,655	345,193	228,000	51,629	WECC	235,900	241,710	219,348	56,992
			\$ 77,618	AVERAGE				\$ 87,510