

A nighttime photograph of a city skyline with several illuminated skyscrapers and buildings. The lights are reflected in a body of water in the foreground. A red horizontal line is positioned below the skyline.

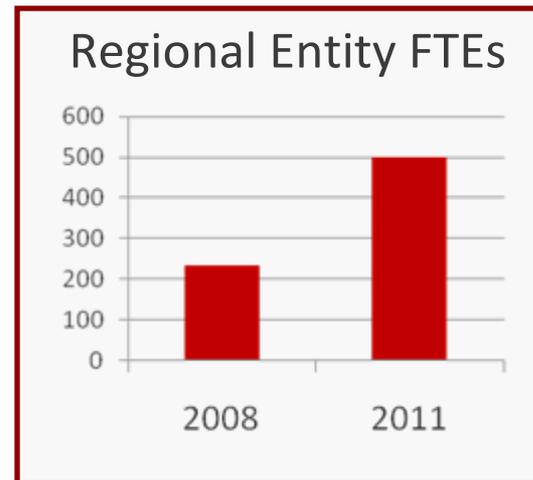
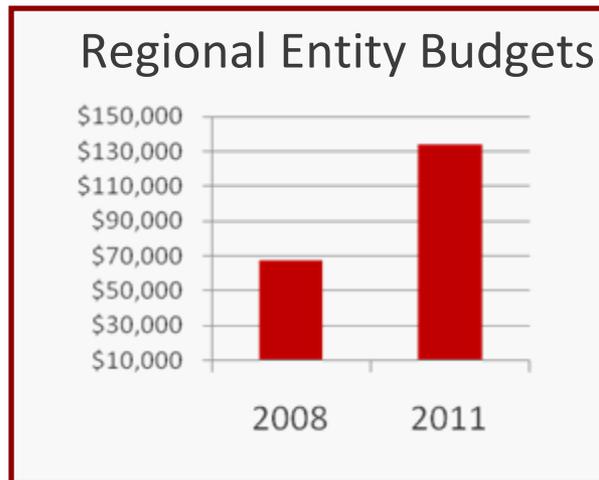
**Helping our members work together to keep the lights on...
today and in the future**

Stacy Dochoda – SPP RE General Manager
FERC Technical Conference
November 18, 2010



Accomplishments in Enforcement

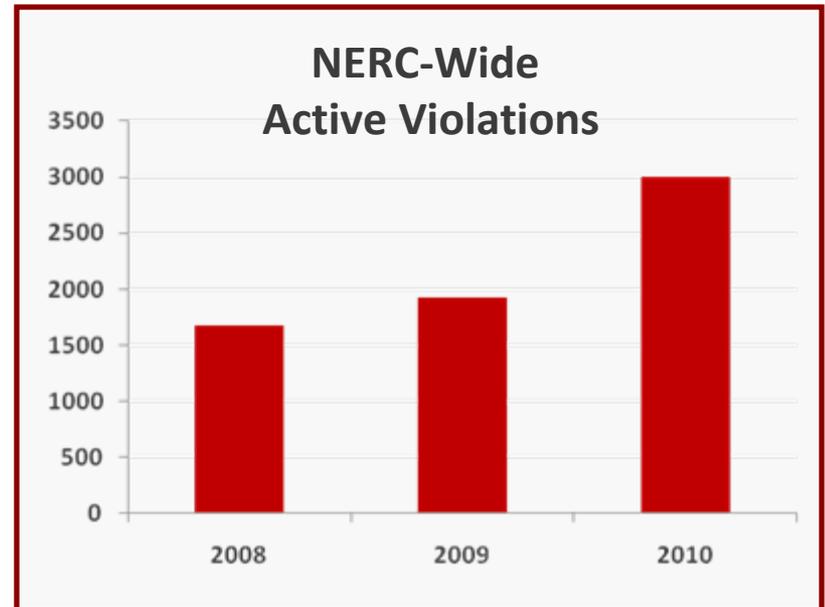
- Penalties scaled to match seriousness of violation
- Implementation of zero penalties where appropriate
- Less rework between Regional Entities & NERC
- Increased resources at Regional Entities and NERC



Current Environment

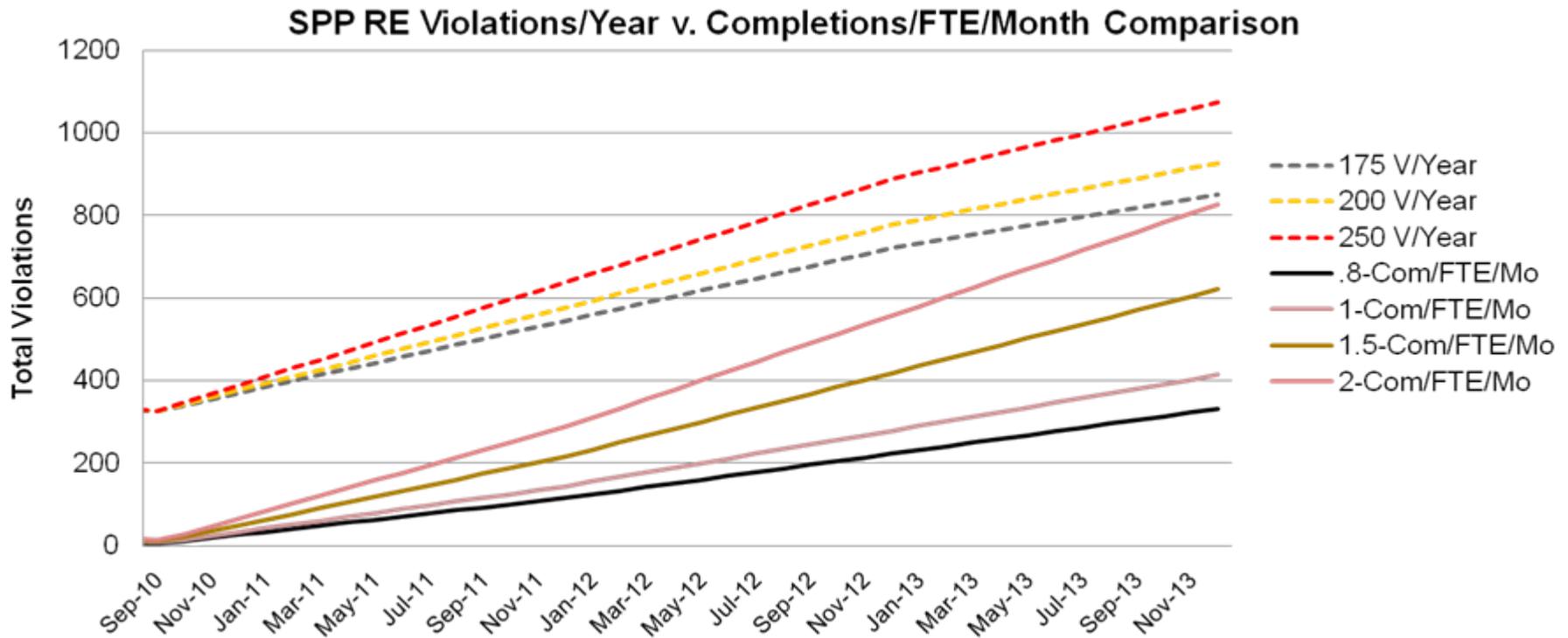
Increase in violations

- More experienced auditors & increased resources
- Information sharing among REs, NERC and FERC
- Improved processes (pre-audit, increased sampling)
- Increased number of standards
- CIP standards
- Outreach and education (> 580 hours in 2010) leading to self-reports



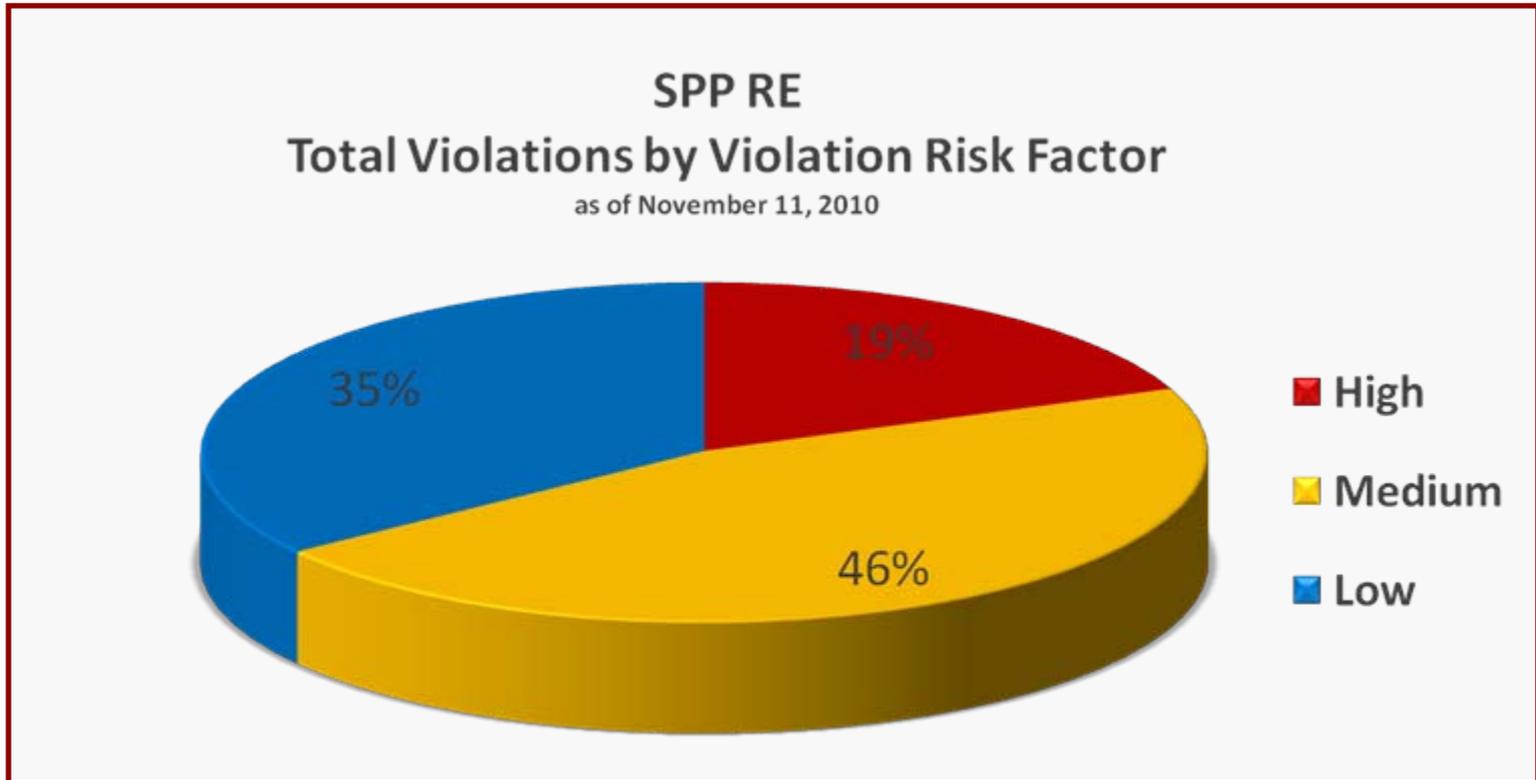
Moving Forward – Elements of Success

- Streamline violation processing
- Risks if we don't (SPP RE example)



Moving Forward – Elements of Success

- Prioritize resources – Spend money and time where it will matter most



FERC Guidance on NOPs

- **Some orders provide guidance to Regional Entities & NERC for future NOPs**
- **Typically 500 violations in final draft form at any time awaiting administrative clean-up by Regional Entities and NERC**
- **Request Commission guidance apply in a way that avoids rework of violations already in final draft form**