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Compliance Audit Report FPL Energy Seabrook, LLC.

October 2, 2007

Public Version

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Executive Summary

The offsite compliance audit of the FPL Energy Seabrook facility was conducted on October 2, 2007. The auditor evaluated compliance with eleven reliability standards pertaining to the Generator Owner/Generator Operator functions identified in the NERC 2007 Implementation Plan for the period of the last twelve months or monitoring timeframes specified in each reliability standard. The auditor reviewed accompanying documentation FPL Energy presented as evidence of compliance.

Four of the reliability standards applicable to GO/GOP's were classified as not applicable to Seabrook, see Audit Results Findings. FPL Energy provided adequate evidence of compliance with of the remaining standards. Note that due to the sensitivity of nuclear station documentation, FPL Energy requested that none of their supporting information be copied and the auditor complied and is returning the information CD back to FPL Energy. FPL has committed to retain this information as presented, for future retrieval if required by NPCC, NERC and/or FERC.

Audit Process

The compliance audit process steps are detailed in the NERC CMEP. The NERC CMEP generally conforms to the United States Government Accountability Office Government Auditing Standards and other generally accepted audit practices.

Objectives

All registered entities are subject to audit for compliance with all reliability standards applicable to the functions for which the registered entity is registered.¹ The audit objectives are:

- Independently review FPL Energy Seabrook's compliance with the requirements of the reliability standards that are applicable to FPL Energy Seabrook based on its registered functions.
- Validate compliance with applicable reliability standards from the NERC 2007 Implementation Plan list of actively monitored standards.

Scope

The compliance audit was performed by an independent auditor with support from the regional compliance manager. Confidentiality agreements executed by the independent contractors and code of conduct documentation for the NERC representative and regional compliance staff were provided to the audited entity in advance of the audit. FPL Energy was given an opportunity to object to the auditor on the basis of a possible conflict of interest or the existence of other circumstances that could interfere with the auditor's impartial performance of duties. FPL Energy accepted the auditor with no objections.

The auditor did not see a need to question any employees representing subject matter expertise. After reviewing the accompanying documentation FPL Energy Seabrook presented as evidence of compliance, the auditor was more than satisfied with the submission.

¹ North American Electric Reliability Corporation CMEP, paragraph 3.1, Compliance Audits

In addition, the Auditor verified FPL Energy Seabrook's GO/GOP compliance with the Reliability Coordinator for the jurisdiction, the Independent System Operator New England (ISO-NE) and the local control center in New Hampshire (ESCC).

Compliance audits of GO/GOP's are scheduled on a periodic basis of six year intervals. The reliability standards reviewed in the FPL Energy Seabrook audit included all of the standards pertaining to the GO/GOP functions in the NERC 2007 Implementation Plan. For the 2007 program, reliability standards are monitored based on the retention periods and monitoring timeframes specified in each reliability standard. The list of reliability standards along with their corresponding monitoring timeframes are listed in Appendix 1. The Northeast Power Coordinating Council's Compliance Manager provided a list of reliability standards and supporting documentation to FPL Energy Seabrook before the audit.

Methodology

The auditor reviewed the documented evidence and if after reviewing the submitted evidence, the auditor had additional questions, the FPL Energy Seabrook subject matter experts would have been asked to respond to the questions by way of a meeting, email and/or by phone.

The auditor would take time to go through submitted evidence and discuss findings with NPCC's Compliance Manager and with the ISO-NE's Operations representatives when necessary to determine if the evidence meets the requirements of the reliability standard. If the evidence was inadequate or did not cover all of the requirements in the reliability standard, the auditor would have asked for additional evidence. If FPL Energy Seabrook could not find or submit additional evidence then the auditor determined that a possible violation exists. FPL Energy was not asked to create documentation in these instances only to submit existing evidence in addition to what was already submitted. The auditor reviewed FPL Energy's documentation offsite. Examples of compliance are log extracts, site procedures, operating directives and copies of maintenance and testing information. Throughout the audit, the auditor took notes on findings of evidence of compliance or if evidence was not sufficient to show compliance.

The auditor shared his preliminary results verbally with the FPL Energy compliance contact.

Audit Considerations

No audit process or procedure can define every possible aspect, situation or scenario encountered by auditors when conducting a compliance audit. Auditors are expected to use their best professional judgment. The following paragraphs describe considerations when conducting bulk electric system reliability compliance audits.

Compliance audits of the bulk electric system reliability are based on newly defined mandatory reliability standards. Implementation of the reliability standards involves some risk for compliance audits due to the inherent learning curve of registered entities. This risk is mitigated by educating registered entities via regional compliance seminars, providing reliability standard information on the regional and NERC websites, encouraging industry involvement in the standards development process and by training compliance auditors.

The bulk electric system contains many variables which require skilled personnel to plan and operate in a reliable manner. Many requirements in the NERC reliability standards specify or are dependent on reliability studies depicting both the planning and operational time horizons. It is difficult to audit the validity of the multitude of studies that are performed to ensure registered

entities meet these requirements. To mitigate this risk the audit team must make professional judgments in its assessment of compliance based on 1) the interview with the registered entity's subject matter experts, 2) documented reports and policies, 3) tools/programs used to perform the studies, 4) results of the studies.

Company Profile

FPL Energy, LLC is a wholly-owned subsidiary of FPL Group. FPL Energy, LLC. owns and operates Seabrook Nuclear Station and in addition owns and operates over 15,000 MW of generation nationwide including Fossil, Hydro, Solar, Wind, and Nuclear.

FPL Energy, LLC as a Generator Owner / Operator in NPCC does not own or operate any portion of the Bulk Electric System, and in the NPCC Region, it interfaces with NYISO and ISO-NE. Seabrook Nuclear station only interfaces with ISO-NE.

FPL Energy Seabrook is affiliated with the Northeast Power Coordinating Council (NPCC). NPCC is applying to be a Regional Entity under NERC, the FERC-certified nations Electric Reliability Organization.

Audit Specifics

The offsite compliance audit was conducted on October 2, 2007.

Audit Team

| Audit Team Role | Name | Title | Company |
|------------------------|----------------|-----------------------|-------------------------------|
| Lead | Kim Pitchell | Contracted Consultant | NPCC-Compliance Audit Program |
| Member | Sal Buffamante | Manager | NPCC-Compliance Audit Program |

FPL Energy Seabrook Contact

| Name | Title | Organization |
|-----------------|--------------------|---------------------|
| Benjamin Church | Compliance Manager | FPL Energy LLC. |

Audit Results

The auditor documented the evidence reviewed for compliance with each applicable reliability standard.

Findings

The following table details the summarized auditor notes relating to evidence reviewed for compliance with the reliability standards.

| Reliability Standard | Auditor Notes | Finding |
|-----------------------------|---|----------------|
| BAL-001-0 | FPL Energy Seabrook is not a BA, ISO-NE holds this responsibility | NA |

| Reliability Standard | Auditor Notes | Finding |
|-----------------------------|---|----------------|
| BAL-002-0 | FPL Energy Seabrook is not a BA; ISO-NE holds this responsibility. | NA |
| BAL-003-0 | FPL Energy Seabrook is not a BA; ISO-NE holds this responsibility. | NA |
| CIP-001-1 | FPL Energy Seabrook supplied the facility security plan | Compliant |
| CIP-002-1 through CIP-009-1 | FPL Energy Seabrook was not requested to supply this information at this time | NA |
| COM-001-1 | FPL Energy Seabrook was not requested to supply this information at this time | NA |
| EOP-001-0 | FPL Energy Seabrook was not requested to supply this information at this time | NA |
| EOP-003-1 | FPL Energy Seabrook was not requested to supply this information at this time. | NA |
| EOP-005-1 | FPL Energy Seabrook was not requested to supply this information at this time | NA |
| EOP-006-1 | Not applicable – FPL Energy Seabrook is not a reliability coordinator. | NA |
| EOP-008-0 | FPL Energy Seabrook was not requested to supply this information at this time | NA |
| EOP-009-0 | FPL Energy Seabrook is not classified as having black start facilities | NA |
| FAC-003-1 | FPL Energy Seabrook was not requested to supply this information at this time | NA |
| FAC-008-1 | FPL Energy Seabrook provided adequate evidence | Compliant |
| FAC-009-1 | FPL Energy Seabrook provided adequate evidence | Compliant |
| IRO-001-1 | Only R8 applies, FPL Energy Seabrook provided adequate evidence | Compliant |
| IRO-004-1 | Only R4 would apply and FPL Energy Seabrook provided adequate evidence that this function is delegated to PMI | NA |
| IRO-014-1 | Not applicable – FPL Energy Seabrook is not a reliability coordinator. | NA |
| IRO-015-1 | Not applicable – FPL Energy Seabrook is not a reliability coordinator. | NA |
| IRO-016-1 | Not applicable – FPL Energy Seabrook is not a reliability coordinator. | NA |
| PER-002-0 | FPL Energy Seabrook was not requested to supply this information at this time | NA |
| PER-003-0 | FPL Energy Seabrook was not requested to supply this information at this time | NA |
| PER-004-1 | Not applicable – FPL Energy Seabrook is not a reliability coordinator. | NA |
| PRC-004-1 | Only R2 applies, FPL Energy Seabrook provided adequate evidence | Compliant |
| PRC-005-1 | FPL Energy Seabrook provided adequate evidence | Compliant |
| PRC-008-0 | Not applicable to FPL Energy Seabrook | NA |
| PRC-010-0 | FPL Energy Seabrook was not requested to supply this information at this time | NA |
| PRC-011-0 | Not applicable to FPL Energy Seabrook | NA |
| PRC-016-0 | Not applicable to FPL Energy Seabrook; no SPS | NA |
| PRC-017-0 | Not applicable to FPL Energy Seabrook; no SPS | NA |
| PRC-021-1 | Not applicable to FPL Energy Seabrook | NA |

| Reliability Standard | Auditor Notes | Finding |
|-----------------------------|---|----------------|
| TOP-003-0 | Only R1 and R3 apply, FPL Energy Seabrook provided adequate evidence | Compliant |
| TOP-004-1 | FPL Energy Seabrook was not requested to supply this information at this time | NA |
| TOP-005-1 | FPL Energy Seabrook was not requested to supply this information at this time | NA |
| TOP-007-0 | FPL Energy Seabrook was not requested to supply this information at this time | NA |
| TPL-001-0 | Not applicable to FPL Energy Seabrook | NA |
| TPL-002-0 | Not applicable to FPL Energy Seabrook | NA |
| TPL-003-0 | Not applicable to FPL Energy Seabrook | NA |
| TPL-004-0 | Not applicable to FPL Energy Seabrook | NA |
| VAR-001-1 | FPL Energy Seabrook was not requested to supply this information at this time | NA |

Conclusions

FPL Energy LLC. provided evidence of compliance with all of the applicable monitored reliability standards. The documentation and employee support afforded the auditor by FPL Energy was precise and excellent.

Summary of FPL Energy Seabrook Response to the Audit Findings

Appendix I – Applicable Reliability Standards

| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to FPL Energy Seabrook? |
|-----------|--------------|---|-----|---|--|------------------------------------|
| BAL-001-0 | All | <p align="center">Real Power Balancing Control Performance</p> | BA | <p>To maintain Interconnection steady-state frequency within defined limits by balancing real power demand and supply in real-time.</p> | <p>The data that supports the calculation of CPS1 and CPS2 (Attachment 1-BAL-001-0) are to be retained in electronic form for at least a one-year period. If the CPS1 and CPS2 data for a Balancing Authority Area are undergoing a review to address a question that has been raised regarding the data, the data are to be saved beyond the normal retention period until the question is formally resolved. Each Balancing Authority shall retain for a rolling 12-month period the values of: one-minute average ACE (ACEi), one-minute average Frequency Error, and, if using variable bias, one-minute average Frequency Bias.</p> | No |

| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to FPL Energy Seabrook? |
|-----------------------------|---------------------|---|---|--|--|---|
| BAL-002-0 | All | Disturbance Control Performance | BA, RSG, RRO | To ensure the Balancing Authority is able to utilize its Contingency Reserve to balance resources and demand and return Interconnection frequency within defined limits. | Compliance for DCS will be evaluated for each reporting period. Reset is one calendar quarter without a violation. The data that support the calculation of DCS are to be retained in electronic form for at least a one-year period. | No |
| BAL-003-0 | All | Frequency Response and Bias | BA | This standard provides a consistent method for calculating the Frequency Bias component of ACE. | Yearly or by request. | No |
| CIP-001-1 | All | Sabotage Reporting | RC, BA, TOP, GOP, LSE | Disturbances or unusual occurrences, suspected or determined to be caused by sabotage, shall be reported to the appropriate systems, governmental agencies, and regulatory bodies. | By request and any events in the last year. | Yes |
| CIP-002-1 through CIP-009-1 | All | Critical Infrastructure Protection Standards | BA, GO, GOP, IA, LSE, NERC, RC, RRO, TO, TOP, TSP | Cyber Security Standards-Follow revised Implementation Plan for Cyber Security Standards CIP-002-1 through CIP-009-1 | By request. | No |

| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to FPL Energy Seabrook? |
|-----------|--------------|--------------------------------------|---|---|---|------------------------------------|
| COM-001-1 | R2 and R5 | Telecommunications | TO, BA, RC, NERCNet User Organizations. | Each Reliability Coordinator, Transmission Operator and Balancing Authority needs adequate and reliable telecommunications facilities internally and with others for the exchange of Interconnection and operating information necessary to maintain reliability. | By request. | No |
| EOP-001-0 | All | Emergency Operations Planning | BA, TOP | Each Transmission Operator and Balancing Authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies. These plans need to be coordinated with other Transmission Operators and Balancing Authorities, and the Reliability Coordinator. | By request. | No |
| EOP-003-1 | All | Load Shedding Plans | BA, TOP | A Balancing Authority and Transmission Operator operating with insufficient generation or transmission capacity must have the capability and authority to shed load rather than risk an uncontrolled failure of the Interconnection. | R1, R5, R6 - Event Driven. Has an event occurred in the past year? R2, R3, R4, R7, R8 – By request | No |

| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to FPL Energy Seabrook? |
|--------------|---------------------|---|-------------|---|--|---|
| EOP-005-1 | All | System Restoration Plans | BA, TOP | To ensure plans, procedures, and resources are available to restore the electric system to a normal condition in the event of a partial or total shut down of the system | By request. Note: entity must follow the timelines specified in the standard: show that the plan is reviewed annually; simulation or testing must be done every 5 years. | No |
| EOP-006-1 | All | Reliability Coordination – System Restoration | RC | The Reliability Coordinator must have a coordinating role in system restoration to ensure reliability is maintained during restoration and priority is placed on restoring the Interconnection. | By request. | No |
| EOP-008-0 | All | Plans for Loss of Control Center Functionality | BA, RC, TOP | Each reliability entity must have a plan to continue reliability operations in the event its control center becomes inoperable. | By request. | No |
| EOP-009-0 | All | Documentation of Blackstart Generating Unit Test Results | GO, GOP | To ensure that the quantity and location of system black start generators are sufficient and that they can perform their expected functions. | By request. Note entity must meet testing frequency specified in EOP-007-0. | No |

| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to FPL Energy Seabrook? |
|--------------|---------------------|---|------------|--|--|---|
| FAC-003-1 | All | Vegetation Management | RRO, TO | To improve the reliability of the electric transmission systems by preventing outages from vegetation located on transmission rights-of-way (ROW) and minimizing outages from vegetation located adjacent to ROW, maintaining clearances between transmission lines. | By request – program documentation and last 4 quarterly outage reports. | No |
| FAC-008-1 | All | Facility Ratings Methodology | GO, TO | To ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on an established methodology. | By request the current methodology and any superseded portions of the methodology within the past 12 months. | Yes |
| FAC-009-1 | All | Establish and Communicate Facility Ratings | GO, TO | To ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on an established methodology or methodologies. | By request. | Yes |

| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to FPL Energy Seabrook? |
|-----------|--------------|--|--------------------------------------|--|----------------------|------------------------------------|
| IRO-001-1 | R8 | Reliability Coordination – Responsibilities and Authorities | BA, GOP, LSE, PSE, RC, RRO, TOP, TSP | Reliability Coordinators must have the authority, plans, and agreements in place to immediately direct reliability entities within their Reliability Coordinator Areas to re-dispatch generation, reconfigure transmission, or reduce load to mitigate critical conditions to return the system to a reliable state. If a Reliability Coordinator delegates tasks to others, the Reliability Coordinator retains its responsibilities for complying with NERC and regional standards. Standards of conduct are necessary to ensure the Reliability Coordinator does not act in a manner that favors one market participant over another. | By request. | Yes |
| IRO-004-1 | R4 | Reliability Coordination — Operations Planning | BA, GO, GOP, LSE, RC, TO, TOP, TSP | Each Reliability Coordinator must conduct next-day reliability analyses for its Reliability Coordinator Area to ensure the Bulk Electric System can be operated reliably in anticipated normal and Contingency conditions. | By request. | No |

| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to FPL Energy Seabrook? |
|--------------|---------------------|---|------------|---|---|---|
| IRO-014-1 | All | Procedures, Processes, or Plans to Support Coordination Between Reliability Coordinators | RC | To ensure that each Reliability Coordinator's operations are coordinated such that they will not have an Adverse Reliability Impact on other Reliability Coordinator Areas and to preserve the reliability benefits of interconnected operations. | By request. | No |
| IRO-015-1 | All | Notifications and Information Exchange Between Reliability Coordinators | RC | To ensure that each Reliability Coordinator's operations are coordinated such that they will not have an Adverse Reliability Impact on other Reliability Coordinator Areas and to preserve the reliability benefits of interconnected operations. | Rolling 12 months of information provided on request. | No |
| IRO-016-1 | All | Coordination of Real-time Activities Between Reliability Coordinators | RC | that they will not have an Adverse Reliability Impact on other Reliability Coordinator Areas | Rolling 12 months of information provided on request. | No |
| PER-002-0 | All | Operating Personnel Training | BA, TOP | Each Transmission Operator and Balancing Authority must provide their personnel with a coordinated training program that will ensure reliable system operation. | By request training program and training records. | No |

| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to FPL Energy Seabrook? |
|--------------|---------------------|---|------------------|---|--|---|
| PER-003-0 | All | Operating Personnel Credentials | BA, RC, TOP | Certification of operating personnel is necessary to ensure minimum competencies for operating a reliable Bulk Electric System. | By request latest certification information and present calendar year plus previous calendar year staffing plan. | No |
| PER-004-1 | All | Reliability Coordination — Staffing | RC | Reliability Coordinators must have sufficient, competent staff to perform the Reliability Coordinator functions. | By request - Each Reliability Coordinator shall keep evidence of compliance for the previous two calendar years plus the current year. | No |
| PRC-004-1 | R2 | Analysis and Mitigation of Transmission and Generation Protection System Misoperations | DP*, GO, TO | Provide trip operation / misoperation information per regional process. | By request – last 12 months of protection system Misoperation analysis. | Yes |
| PRC-005-1 | All | Transmission and Generation Protection System Maintenance and Testing | DP*, GO, TO | Document/implement transmission protection system maintenance/testing/monitoring PROGRAM | By request - maintenance and testing program and testing records to show that testing intervals are on schedule. | Yes |
| PRC-008-0 | All | Implementation and Documentation of Underfrequency Load Shedding Equipment Maintenance Program | DP, TO | Document/implement UFLS maintenance/testing PROGRAM | By request - maintenance and testing program and testing records to show that testing intervals are on schedule. | No |
| PRC-010-0 | All | Technical Assessment of the Design and Effectiveness of Undervoltage Load Shedding Program. | DP, LSE, TO, TOP | ASSESS design and effectiveness of UVLS programs | By request – current assessment. | No |

| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to FPL Energy Seabrook? |
|--------------|---------------------|--|------------------|--|---|---|
| PRC-011-0 | All | UVLS System Maintenance and Testing | DP, TO | Document/implement UVLS maintenance/testing PROGRAM | By request - maintenance and testing program and testing records to show that testing intervals are on schedule. | No |
| PRC-016-0 | All | Special Protection System Misoperations | DP, GO, TO | DOCUMENT/analyze misoperations | By request – last 12 months of special protection system Misoperation analysis. | No |
| PRC-017-0 | All | Special Protection System Maintenance and Testing | DP, GO, TO | Document/implement SPS maintenance/testing PROGRAM | By request - maintenance and testing program and testing records to show that testing intervals are on schedule. | No |
| PRC-021-1 | All | Under-Voltage Load Shedding Program Data | DP, TO | DOCUMENTATION of undervoltage load shedding program | By request – latest UVLS data. | No |
| TOP-003-0 | R1,R3 | Planned Outage Coordination | BA, GOP, RC, TOP | Scheduled generator and transmission outages that may affect the reliability of interconnected operations must be planned and coordinated among Balancing Authorities, Transmission Operators, and Reliability Coordinators. | By request. | Yes |
| TOP-004-1 | R6 | Transmission Operations | TOP | To ensure that the transmission system is operated so that instability, uncontrolled separation, or cascading outages will not occur as a result of the most severe single Contingency and specified multiple Contingencies. | By request - Each Transmission Operator shall keep 90 days of historical data for Measure 1. Each Transmission Operator shall have current, in-force policies and procedures, as evidence of compliance to Measure 2. | No |

| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to FPL Energy Seabrook? |
|--------------|---------------------|---|------------------|---|--|---|
| TOP-005-1 | All | Operational Reliability Information | BA, PSE, RC, TOP | To ensure reliability entities have the operating data needed to monitor system conditions within their areas. | By request. | Yes |
| TOP-007-0 | All | Reporting System Operating Limit (SOL) and Interconnection Reliability | RC, TOP | Ensure SOL and IROL violations are being reported to the Reliability Coordinator so that the Reliability Coordinator may evaluate actions being taken and direct additional corrective actions as needed. | Event driven. | No |
| TPL-001-0 | All | System Performance Under Normal (No Contingency) Conditions | PA, TPL | System performance under normal conditions | By request – latest annual assessment. | No |
| TPL-002-0 | All | System Performance Following Loss of a Single Bulk Electric System Element | PA, TPL | System performance under single contingency | By request – latest annual assessment. | No |
| TPL-003-0 | All | System Performance Following Loss of Two or More Bulk Electric System Elements | PA, TPL | System performance under multiple contingencies | By request – latest annual assessment. | No |
| TPL-004-0 | All | System Performance Following Extreme Events Resulting in the Loss of Two or More Bulk Electric System Elements | PA, TPL | System performance under extreme contingencies | By request – latest annual assessment. | No |

| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to FPL Energy Seabrook? |
|-----------|--------------|-------------------------------------|----------|---|--------------------------------------|------------------------------------|
| VAR-001-1 | All | Voltage and Reactive Control | PSE, TOP | To ensure voltage levels, reactive flows, and reactive resources are monitored, controlled, and maintained within limits in real time to protect equipment and the reliable operation of the Interconnection. | By request – last 12 months of data. | No |

Appendix 2: Confidential Security Sensitive Information

[This section contains confidential security sensitive information which is not included with the public version, but retained by NERC and the regional organization and is sent privately to the audited entity.]