



Compliance Audit Report Public Version

**Alabama Municipal Electric Authority
(AMEA) - NCR01165
November 13, 2007**

**Confidential Information (including
Privileged and Critical Energy Infrastructure
Information) – Has Been Removed**

December 13, 2007

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EXECUTIVE SUMMARY

This final compliance audit report is the public version. Confidential information (including privileged and critical energy infrastructure information) has been redacted from this report. The full final compliance audit report was submitted to the audited entity and NERC.

Alabama Municipal Electric Authority (AMEA) was audited on November 13, 2007 for compliance with the requirements contained in the NERC Reliability Operating Standards that are currently enforceable and apply to AMEA's operation. This audit focused on documents and other evidence provided to SERC by the staff of AMEA, and did not include any evidence obtained through system observation or inspection. The findings of the audit are based on the state of compliance at the time of the audit, and do not reflect past compliance activities or activities that will be completed in the future.

The audit was conducted by asking AMEA staff to show valid evidence of meeting each individual requirement and sub-requirement contained in the 12 reliability standards that had been previously identified by SERC to AMEA as subject to this audit. AMEA staff would then cite specific portions of the evidence that demonstrated compliance. This evidence and the citations were documented and evaluated by the audit team for the level of compliance and agreement with the requirement. If all of the requirements and sub-requirements of an audited standard were met, then AMEA was judged to be compliant. Likewise, if any of the requirements or sub-requirements were not fully met, then AMEA was judged to have a possible violation of the standard. In other words, only a score of 100% is identified as compliant; 99% and below is a possible violation.

The audit team determined that AMEA does not own a Blackstart capable generation, Undervoltage Load Shedding or Special Protection Systems and therefore, did not assess the standards EOP-009-0 – Documentation of Blackstart Generating Unit Test Results, PRC-010-0 – Assessment of the Design and Effectiveness of UVLS Program, PRC-016 – Special Protection System Misoperations, and PRC-017-0 – Special Protection System Maintenance and Testing. Critical Infrastructure Protection standards CIP-002 through CIP-008, although applicable to AMEA, were not identified to AMEA as being within the audit scope and were not assessed during this audit.

Evidence provided by AMEA demonstrated full compliance with the remaining eight audited standards.

The quality of evidence, programs and procedures provided to auditors indicated a strong compliance culture within AMEA's operations. AMEA's subject matter experts were well prepared, knowledgeable of reliability standard requirements and demonstrated a total commitment to compliance and improvement of their compliance program.

AUDIT PROCESS

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

Scope

The scope of the audit of AMEA was to look at all applicable reliability standards in the NERC 2007 Compliance Monitoring and Enforcement Plan. AMEA is registered with SERC as a Generator Owner, Generator Operator and Load-Serving Entity. Of the 12 reliability standards that were identified as applicable to AMEA, all 12 were selected for review in this audit.

Note: For the 2007 compliance program, the monitoring period for the compliance audit will be the past 12 months or periods specified in individual reliability standards. The monitoring period is not limited to the time period for which penalties and sanctions are assessed.

Methodology

The audit was conducted by reviewing all of the standards that apply to AMEA, based on AMEA's registered functions, in the NERC 2007 Compliance Monitoring and Enforcement Program. The audit was scheduled during normal business hours and standards were grouped to minimize imposition and make the most efficient use of AMEA staff's time. AMEA's staff had been briefed on the standards that were to be addressed so that documentation and evidence of compliance could be assembled.

One team of two SERC staff auditors and an Audit Team Leader conducted the audit of AMEA. The audit team had a moderator who would initiate dialogue on each standard requirement and request evidence of compliance. A second auditor served as a scribe to document the evidence presented, staff responses, and auditor comments. The audit team reviewed the evidence and questioned AMEA staff to obtain sufficient understanding of the evidence and processes to enable a determination of compliance with standard requirements. This process was used to determine compliance with each individual requirement and sub-requirement of the 12 standards that had been previously identified by SERC to AMEA as subject to this audit. AMEA staff responded by providing evidence in the form of reports, procedures, policies, studies and other documents. AMEA staff would then cite specific portions of the evidence that demonstrated compliance. This evidence and the citations were documented and evaluated by the audit team for the level of compliance and agreement with the requirement. Discrepancies between the

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

requirement and the evidence provided were the subject of dialogue among the team members and AMEA staff members until it could be agreed that each requirement was met by the cited evidence or other evidence offered. If it was felt that, after all evidence had been presented and discussed, AMEA did not have sufficient evidence to support a finding of compliance, a possible violation was identified by the team and AMEA staff.

Company Profile

The Alabama Municipal Electric Authority (AMEA or Authority) is a public corporation of the State of Alabama. The Authority was created on August 17, 1981 pursuant to the provisions of Act No. 81-681 of the State of Alabama Legislature for the purpose of securing an adequate, dependable and economical power supply for its participating members. AMEA is a municipal joint-action agency.

AMEA has 11 participating members (hereinafter, “Members”), which consist of municipalities, utility boards, and an electric board. Each Member owns and operates its own electric distribution system and provides retail electric service. AMEA sells bulk electric power and energy to its Members pursuant to the Amended and Restated Power Sales Contract between Alabama Municipal Electric Authority and each Member as amended (the “Power Sales Contract”). The term of each Power Sales Contract extends through December 31, 2035.

The Power Sales Contracts require that AMEA furnish, and each Member take and pay for, all power and energy requirements of the Member (“full-requirement services”) in excess of that supplied by the Southeastern Power Administration (SEPA) and any excluded power supply resources, as defined therein. Initially, Members are required to purchase all of their full-requirement services from AMEA. Under the terms of the Power Sales Contracts, each Member may acquire Excluded Power Supply Resources under certain conditions. Currently, no Member obtains power from any source other than AMEA and SEPA. AMEA’s Net Energy for Load reported to SERC includes the total electrical energy supplied by both AMEA and SEPA to satisfy AMEA’s Members’ electrical load.

AMEA obtains power and energy to serve its Members through contractual arrangements and from its sole electric generating station, the AMEA-Sylacauga Plant. The Sylacauga Plant consists of two simple-cycle gas turbine generating units, each rated at 47.5 MW. AMEA uses the plant for peaking purposes. The plant is located near the city of Sylacauga, Alabama, and is connected to a 115 kV transmission line owned by Alabama Power Company (APCO). APCO is one of the operating companies of the Southern Company.

Most of AMEA’s power and energy requirements are purchased from APCO pursuant to the Power Supply Agreement (PSA) between Alabama Power Company and Alabama Municipal Electric Authority. AMEA receives network transmission service under Southern Company’s Open Access Transmission Tariff.

Pursuant to the PSA, APCO supplies all of AMEA’s requirements other than those supplied from the Sylacauga Plant and from certain short-term transactions that AMEA may enter into from time to time. APCO supplies firm, system power from all of its resources and, when appropriate or necessary, from purchases from other sources (including other Southern Company operating

subsidiaries). APCO also supplies AMEA's reserve capacity requirements, including those for AMEA's Sylacauga Plant.

Also pursuant to the PSA, APCO (by and through SCS acting as APCO's agent) supplies all requisite control area services for AMEA. AMEA is thus included within the control area of the Southern Company, in which APCO is also included. Southern Company Services, Inc. (SCS) acting as agent for APCO, Georgia Power Company, Mississippi Power Company and Gulf Power Company, operates the control area. SCS also dispatches all of the resources of the Southern operating companies within the control area.

Audit Specifics

The compliance audit was conducted on November 13, 2007 at the AMEA office in Montgomery, Alabama.

Audit Team

Audit Team Role	Name	Title	Company
Lead	Sam Stryker	Senior Compliance Auditor	SERC Staff
Member	James Harrell	Compliance Auditor	SERC Staff
Member	Chris Schaefer	Manager, Planning & Engineering	SERC Staff

AUDIT RESULTS

The audit began at 8:00 a.m., November 13, 2007 with an opening presentation by Sam Stryker, SERC Senior Auditor and Audit Team Leader. He reviewed the NERC Compliance Monitoring and Enforcement Program for 2007 in general, and how it applied to AMEA specifically. He introduced and reviewed the standards to be covered in the audit, and addressed both the expectations of AMEA staff and the quality of evidence to be presented. He also covered the basic procedure for the audit, and the rules of conduct. Each member of the audit team was introduced and professional affiliations identified. The opening presentation was followed by an introduction of participating AMEA staff, and an overview of AMEA's operations, corporate organization and compliance activities by Tom Bartels.

The audit team initially reviewed the registration status of AMEA with AMEA staff to verify application of each standard. Each standard's audit began with a recitation of each requirement and an explanation, if requested by AMEA. AMEA staff would then present evidence of meeting this requirement, or cite evidence in material already presented to the team. At that point, the evidence was reviewed and dialogue took place until the team reached a point of satisfaction with the evidence. Consensual approval or concern was reached on each of the requirements and explained to AMEA staff before proceeding to the next requirement. At that point, the team scribe would record the evidence presented to satisfy the requirement and the team's recommendation on that requirement using the Reliability Standard Auditor Worksheet (RSAW).

After completing a review of all applicable requirements in the standard, the overall compliance to that standard was reviewed first by the team and AMEA staff, and then by the Audit Team Leader. Any concerns or dissention with the recommendation was offered, and the Audit Team Leader would indicate support or disagreement with the recommendation. Dialogue would ensue to the point of decision on the part of the Audit Team Leader. Following this review, the RSAW would be updated with the compliance recommendation.

The review of all applicable standards was completed at approximately 2:30 p.m., November 13, 2007 and the audit team met to review and discuss the findings. At approximately 3:00 p.m., the audit team collected all notes and evidence as needed and began to finalize the RSAWs. The Audit Team Leader began to develop the Exit Briefing with the help of all team members, by using a projector connected to his laptop. This facilitated the consensus of the full team on the content of the Exit Briefing, and re-affirmed the team's findings and recommendations.

The Exit Briefing was presented to the assembled Audit Team and AMEA staff at approximately 3:30 p.m. and was followed by an informal response from AMEA staff. The Audit Team Leader solicited both informal comments from the AMEA staff, and requested that they fill out formal feedback forms for submission to SERC and NERC. The Audit Team left the AMEA meeting room at approximately 4:00 p.m., November 13, 2007.

Findings

Reliability Standard	Auditor Notes	Finding
BAL-001-0	Not Applicable – AMEA is not a BA	N/A
BAL-002-0	Not Applicable – AMEA is not a BA, RSG or RRO	N/A
BAL-003-0	Not Applicable – AMEA is not a BA	N/A

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Reliability Standard	Auditor Notes	Finding
CIP-001-1	<p>R1 - RCP-NERC-CIP-001-1-LSE and RCP-NERC-CIP-001-1 procedures, section 2 provides criterion for recognition of sabotage events. RCP-NERC-CIP-001-1-LSE Section 4 provides notification structure for LSE. RCP-NERC-CIP-001-1 Section 4 provides notification structure for GOP. AMEA demonstrated compliance with sabotage recognition and notification requirements of R1.</p> <p>R2 - RCP-NERC-CIP-001-1-LSE – Section 3 specifies how to report, Section 4 identifies notification contacts for Alabama Power Company. RCP-NERC-CIP-001-1 – Sections 3 and 4 – Southern Company, Police Sheriff DHS, ESISAC, FBI. All communications via telephone and recorded via GENCOM. AMEA demonstrated compliance with R2.</p> <p>R3 - RCP-NERC-CIP-001-1-LSE RCP-NERC-CIP-001-1, Sections 3 and 4 of both procedures. Procedures and contact information stored and available in plant control room. Threat and Sabotage Report Form used with both above identified procedures to document event and event notifications. Form date 5/22/07. Off-line plant inspection form documents daily security inspections made by plant personnel making rounds. AMEA demonstrated compliance with R3.</p> <p>R4 - E-mail from mfaulkne@leo.gov verifies contact with SSRA Michael T. Gavin. dated 5/24/07 at 4:25 PM – LSE verification. E-mail from John Public, fbi_gadra@yahoo.com, dated 8/24/07 at 2:31 PM from Elaine FBI- Gadsden Resident Agency – Plant verification. AMEA demonstrated compliance with R4.</p>	Compliant
CIP-002-1 through CIP-009-1	Standards apply to AMEA but were not assessed in this audit.	Not Assessed
COM-001-1	Not Applicable – AMEA is not a BA, TOP, RC or NERCNet User Organization	N/A
EOP-001-0	Not Applicable – AMEA is not a BA or TOP	N/A
EOP-003-1	Not Applicable – AMEA is not a BA or TOP	N/A
EOP-005-1	Not Applicable – AMEA is not a BA or TOP	N/A
EOP-006-1	Not applicable – AMEA is not a Reliability Coordinator	NA
EOP-008-0	Not applicable – AMEA is not a BA, TOP or RC	N/A
EOP-009-0	Standard applies to AMEA per registered functions, but AMEA does not own Blackstart capable generation and is not listed in the SERC BCP.	Not Assessed
FAC-003-1	Not applicable – AMEA is not a TO or RRO	N/A

Reliability Standard	Auditor Notes	Finding
FAC-008-1	<p>R1 - RCP-NERC-FAC-008-1 Facility Ratings Methodology Rev. 0 dated 5/22/07 documents AMEA's FRM – umbrella document.</p> <p>RCP-NERC-FAC-008-1-D1 – Facility Ratings Methodology Procedure, Rev 0, dated 5/22/07 documents AMEA - Sylacauga Plant.</p> <p>RCP-NERC-FAC-008 Rev 0 dated 6/12/07 Sylacauga Generating Facility Real Power and Reactive Power Capability Rating Procedure, establishes real and reactive capability (Facility Ratings Mehtodology.doc), Section C, pages 2/3 – limiting equipment statement.</p> <p>RCP-NERC-FAC-008 Rev 0 dated 6/12/07 Sylacauga Generating Facility Real Power and Reactive Power Capability Rating Procedure, Section C, page 2/3 identifies equipment considered.</p> <p>RCP-NERC-FAC-008-1 Facility Ratings Methodology Rev. 0 dated 5/22/07 documents AMEA's FRM – umbrella document, attachment 33 indicates limiting factors, paragraph 1 – rating criteria, ambient conditions, humidity and seasonal conditions. Limiting equipment – paragraphs 4 and 6. Summer limiting are chillers and chilled water coils, Winter limiting equipment is fuel valves for gas turbines.</p> <p>RCP-NERC-FAC-008 Rev 0 dated 6/12/07 Sylacauga Generating Facility Real Power and Reactive Power Capability Rating Procedure, establishes real and reactive capability (Facility Ratings Mehtodology.doc), Section D1 – normal ratings; Section E page 5 – emergency ratings.</p> <p>AMEA demonstrated compliance with R1.</p> <p>R2 - RCP-NERC-FAC-008-1-D1 – Facility Ratings Methodology Procedure, Rev 0, dated 5/2207 documents AMEA - Sylacauga Plant, section 4, page 4 establishes intention to supply documents, on request, within required timeframe.</p> <p>AMEA demonstrated compliance with R2.</p> <p>R3 - RCP-NERC-FAC-008-1-D1 – Facility Ratings Methodology Procedure, Rev 0, dated 5/2207 documents AMEA's intent to respond to comments - Sylacauga Plant, section 4, page 4.</p> <p>AMEA demonstrated compliance with R3.</p>	Compliant

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Reliability Standard	Auditor Notes	Finding
FAC-009-1	<p>R1 - RCP-NERC-FAC-009 – D1, Rev 0, dated 5/10/07, section 4 establishes intention to comply with FRM.</p> <p>AMEA provided individual PDF files indicating ratings of each piece of equipment. AMEA provided a letter from Mark B. Gillis, a registered PE in the state of Alabama, indicating that the facility rating is consistent with AMEA's FRM. AMEA demonstrated compliance with R1.</p> <p>R2 - RCP-NERC-FAC-009, rev 0 dated 5/10/07 – Establish and Communicate Facility Ratings, section 4 establishes intent to provide ratings to appropriate parties.</p> <p>Original Interconnection Agreement.pdf, page 47 – 55, dated 2/24/04, and effective 19 Feb 04, verifies AMEA provided facility ratings to Alabama Power.</p>	Compliant
IRO-001-1	<p>Requirements R1 through R7 and R9 are not applicable to AMEA as a Generator Owner, Generator Operator and Load-Serving Entity.</p> <p>R8 - Entity states that they have not received a directive from the RC and verified that they understand what a directive is.</p> <p>RCP-NERC-IRO-001-LSE and RCP-NERC-IRO-001 Section 4, page 3 of both procedures document entity's intent to comply with directive.</p> <p>Operations Manual, Volume II – Operating Procedure, Plant Manager's Standing Orders, Rev., 3 dated 1 April 07 RCP-OP-004-Standing Orders, Section 20F, page 11 directs plant operating personnel to comply with GENCOM notices, directives, etc.</p> <p>Reliability Compliance Manual Procedure No.: RCP-NERC-ACK-001, Rev 0, dated 9/14/07, section 2, requirement 2 requires applicable AMEA personnel to read all applicable procedures. Section 3 requires completion of an acknowledgement form to verify reading required documents.</p> <p>AMEA demonstrated compliance with R8.</p>	Compliant

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Reliability Standard	Auditor Notes	Finding
IRO-004-1	<p>R1, R2, R3, R5, R6 and R7 are not applicable to AMEA as a Generator Owner, Generator Operator and Load-Serving Entity.</p> <p>R4 - RCP-NERC-IRO-004-LSE and RCP-NERC-IRO-004, section 4 states AMEA's load is a portion of Southern Company's load, and therefore Southern Company is aware of AMEA load requirements.</p> <p>Southern Company's GENCOM program is used to provide dispatch, deratings, forced outages and voltage schedules to GENCOM and for acknowledgement by Southern Company.</p> <p>Reviewed GENCOM Generation Message dated 11/13/07 at 7:13 confirming communication (random message selection by auditors). Reviewed summary of communications from 10/1 – 11/13/07 confirming communications.</p> <p>Load forecasts provided hourly to Southern via Southern Company's AMEA Cost Forecast, Version 1.9.</p> <p>SERC Portal verifies AMEA, reporting utility 40614, monthly demand and energy forecast. Verified reports for 2006 and 2007.</p> <p>Viewed AMEA 2000 – 2010 Summer/Winter forecasts via SERC Portal.</p> <p>AMEA demonstrated compliance with requirement 4.</p>	Compliant
IRO-014-1	Not applicable – AMEA is not a Reliability Coordinator	N/A
IRO-015-1	Not applicable – AMEA is not a Reliability Coordinator	N/A
IRO-016-1	Not applicable – AMEA is not a Reliability Coordinator	N/A
PER-002-0	Not Applicable – AMEA is not a BA or TOP	N/A
PER-003-0	Not Applicable – AMEA is not a BA, TOP or RC	N/A
PER-004-1	Not applicable – AMEA is not a RC	N/A

Reliability Standard	Auditor Notes	Finding
<p>PRC-004-1</p>	<p>R1 – Not applicable – AMEA is not a Transmission Owner or Distribution Provider.</p> <p>R2 - RCP-NERC-PRC-004 Analysis and Mitigation of Transmission and Generation Protection System Misoperations Rev 0, May 22, 07, section 4 requires research of any past misoperations and recording on Attachment 16.</p> <p>Operators log any protection system operations, notify Plant Manager and appropriate plant maintenance personnel. (citation) – Power Plant Operations Manual, Operating Procedure 004 (OP-104), section 17, prevents operations personnel from restarting equipment without determining cause and receiving permission from Plant Manager.</p> <p>RCP-NERC-Attachment 16, Rev 3, dated 5/15/07 Generator Protective System Misoperations and Corrective Action Form</p> <p>AMEA has not had a protective system operation since June of 2007. AMEA has completed self-certifications and reporting forms via the SERC portal indicating no misoperations for the Oct – Mar period of 07. AMEA demonstrated compliance with R2.</p> <p>R3 - RCP-NERC-Attachment 16, Rev. 3, dated 5/15/07 Generator Protective System Misoperations and Corrective Action Form provides entity with documentation to facilitate reporting in accordance with SERC Supplement requirements.</p> <p>AMEA’s Statement of Compliance for PRC-004, last paragraph establishes intent to comply with providing misoperation data.</p> <p>AMEA has not had any misoperations. This is an event driven requirement. AMEA demonstrated compliance with R3.</p>	<p>Compliant</p>
<p>PRC-005-1</p>	<p>R1 - RCP-NERC-PRC-005 Rev 1, dated 9/14/07, section 4 establishes relay testing intervals, basis and refers to PJM Relay Subcommittee Relay Testing and Maintenance Practices (2/26/04) for a summary of maintenance and testing procedures. Functional testing of control circuitry (trip testing) is a part of normal relay testing. Provides intervals, basis and summary maintenance and testing procedures for Current & Voltage sensing devices, Communications circuits, and Station batteries.</p> <p>AMEA demonstrated compliance with R1.</p> <p>R2 - Reviewed ProTest test results for (random auditor selected) GSU A Backup Relay SEL-551-1 S/N 2003246102 dated 3/6/06. This is first maintenance interval since facility commissioning in May of 2004.</p> <p>AMEA demonstrated compliance with R2.</p>	<p>Compliant</p>

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Reliability Standard	Auditor Notes	Finding
PRC-008-0	Not applicable – AMEA is not a Transmission Owner or Distribution Provider and does not own an UVLS.	N/A
PRC-010-0	Standard applies to AMEA as a Load-Serving Entity, but AMEA does not own or operate UVLS equipment	Not Assessed
PRC-011-0	Not applicable – AMEA is not a Transmission Owner or Distribution Provider and does not own an UVLS.	NA
PRC-016-0	Applies to AMEA as a GO, but AMEA does not own or operate any Special Protection Systems.	Not Assessed
PRC-017-0	Applies to AMEA as a GO, but AMEA does not own or operate any Special Protection Systems.	Not Assessed
PRC-021-1	Not applicable – AMEA is not a DP or TOP	N/A
TOP-003-0	<p>R1 - AMEA provided yearly planned outage information to Dennis Hutson Alabama Power, letter dated 10/31/06 from AMEA Sylacauga Plant, from Tim Foster, Plant Manager.</p> <p>Scheduled outage submittal via Southern Company's Contract Energy Scheduler dated 3/30/07 at 14:01:20 CDT for period of 4/12/07 – 5/15/07, for both CT1 and CT2.</p> <p>Viewed historical CES submittal for 9/17/07 indicating availability for both units – no time stamp in program. Also for 10/8/07 when unit was dispatched on-line.</p> <p>AMEA demonstrated compliance with R1.</p> <p>R2 - System alarms when voltage regulator kicks out of automatic, notifications are made to Alabama Power and Southern Company.</p> <p>Power Plant Operations Manual/Plant Manager's Standing Orders; page 10 of the Word document and section 20. Rev 3, 4/1/07, items K and L, page 12.</p> <p>AMEA demonstrated compliance with R2.</p> <p>R3 - Power Plant Operations Manual/Plant Manager's Standing Orders; page 10 of the Word document and section 20. Rev 3, 4/1/07; item M page 12.</p> <p>AMEA does not own telemetering equipment; however, procedures are in place to ensure compliance if/when such equipment is installed.</p> <p>AMEA demonstrated compliance with R3.</p> <p>R4 – Not applicable.</p>	Compliant
TOP-004-1	Not applicable – AMEA is not a TOP	N/A
TOP-005-1	Not applicable – AMEA is not a BA, TOP, PSE or RC	N/A
TOP-007-0	Not applicable – AMEA is not a TOP or RC	N/A
TPL-001-0	Not applicable – AMEA is not a PA or TP	N/A
TPL-002-0	Not applicable – AMEA is not a PA or TP	N/A
TPL-003-0	Not applicable – AMEA is not a PA or TP	N/A
TPL-004-0	Not applicable – AMEA is not a PA or TP	N/A

Reliability Standard	Auditor Notes	Finding
VAR-001-1	Not applicable – AMEA is not a PSE or TOP	N/A

Conclusions

Alabama Municipal Electric Authority was audited on 12 monitored standards identified as being applicable to AMEA as a Generator Owner, Generator Operator and Load-Serving Entity. The Audit Team determined that AMEA is in compliance with all of the audited standards.

SUMMARY OF AMEA RESPONSE TO THE AUDIT FINDINGS

The following comments were received from Tom Bartels of AMEA via e-mail on December 6, 2007:

“AMEA offers two minor corrections to the draft audit report, as follows:

On Page 5, in the last paragraph, on the second line there is a sentence that begins, "AME..." which should be changed to "AMEA..."

On Page 6, in the table entitled, AMEA Audit Participants, [Name redacted, See Appendix 2] should be listed in the Operations rather than the Engineering section of AMEA Organization.

With those corrections we anticipate the final report.

Please inform us again where to access the Evaluation section so we can give positive feedback on the Audit Team.

APPENDIX 1 — APPLICABLE RELIABILITY STANDARDS

Std #	Requirements	Standard	Who	Purpose	Monitoring Timeframe	Applicable to AMEA Yes or No
BAL-001-0	All	Real Power Balancing Control Performance	BA	To maintain Interconnection steady-state frequency within defined limits by balancing real power demand and supply in real-time.	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.	No
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

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Std #	Requirements	Standard	Who	Purpose	Monitoring Timeframe	Applicable to AMEA Yes or 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.	Yes
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

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Std #	Requirements	Standard	Who	Purpose	Monitoring Timeframe	Applicable to AMEA Yes or 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
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 blackstart generators are sufficient and that they can perform their expected functions.	By request. Note entity must meet testing frequency specified in EOP-007-0.	Yes

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Std #	Requirements	Standard	Who	Purpose	Monitoring Timeframe	Applicable to AMEA Yes or No
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 four 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.	No
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.	No

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Std #	Requirements	Standard	Who	Purpose	Monitoring Timeframe	Applicable to AMEA Yes or No
IRO-001-1	All	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	All	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.	Yes
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

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Std #	Requirements	Standard	Who	Purpose	Monitoring Timeframe	Applicable to AMEA Yes or 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	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	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
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

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Std #	Requirements	Standard	Who	Purpose	Monitoring Timeframe	Applicable to AMEA Yes or No
PRC-004-1	All	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.	Yes
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

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Std #	Requirements	Standard	Who	Purpose	Monitoring Timeframe	Applicable to AMEA Yes or 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.	Yes
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.	Yes
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	All	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
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.	No

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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

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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