



Compliance Audit Report Public Version

**Bacanton Power LLC
NCR01178
September 25, 2007**

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

November 12, 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.

The Baconton Power LLC was audited on September 25, 2007 for compliance to the requirements contained in the NERC Reliability Standards that are currently enforceable and apply to the Baconton Power LLC electric utility operation. This audit focused on documents and other evidence provided to SERC by the staff of the Baconton Power LLC, and did not include any evidence obtained through system observation or inspection. The findings of the audit are based on the state of compliance and current mitigation activity 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 Baconton Power LLC staff to show valid evidence of meeting each and every individual requirement and sub-requirement contained in the 11 standards that had been previously identified by SERC to Baconton Power LLC as subject to this audit. Baconton Power LLC staff responded by providing evidence in the form of reports, procedures, studies, and other documents. Baconton Power LLC 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 Baconton Power LLC was judged to be compliant. Likewise, if any of the requirements or sub-requirements were not fully met, then Baconton Power LLC 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 Baconton Power LLC electric utility operation was found to be in compliance with the standards that were audited and exhibited a strong desire and willingness to continue improvement of their compliance effort in the future.

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 and objectively review Baconton Power LLC compliance with the requirements of the reliability standards that are applicable to Baconton Power LLC based on the Baconton Power LLC functions in the bulk electric system as determined by SERC.

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

- Validate compliance with applicable reliability standards from the NERC 2007 Implementation Plan list of actively monitored standards.

Scope

The scope of the audit of Baconton Power LLC was to look at all Generator Owner and Generator Operator related standards that are in the NERC 2007 Compliance Monitoring and Enforcement Plan. Of the 19 standards that apply to Baconton Power LLC, 11 were selected for review in this audit. Of these 11 standards 3 standards were not assessed; see findings table below.

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 Baconton Power LLC in the NERC 2007 Enforcement Plan. These standards were grouped and scheduled during the day to make the most efficient use of the Baconton Power LLC staff's time. The Baconton Power LLC staff had been briefed on the standards that were to be addressed so that documentation and evidence of compliance could be assembled.

A team of auditors and subject matter experts were identified and conducted the audit of Baconton Power LLC. The audit team had a moderator who would initiate dialogue on each standard requirement, request compliance evidence, and document the evidence and Baconton Power LLC staff response. This was done by asking Baconton Power LLC staff to show valid evidence of meeting each and every individual requirement and sub-requirement contained in the 11 standards that had been previously identified by SERC to Baconton Power LLC as subject to this audit. Baconton Power LLC staff responded by providing evidence in the form of reports, procedures, studies, and other documents Baconton Power LLC staff would then cite specific portions of the evidence that demonstrated compliance. This evidence and the citations were documented by the scribe on the Reliability Standard Audit Worksheet (RSAW) and evaluated by the audit team for the level of compliance and agreement with the requirement. Discrepancies between the requirement and the evidence provided were the subject of dialogue among the team members and Baconton Power LLC 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, that Baconton Power LLC did not have sufficient evidence to support a finding of compliance, a possible violation would be identified by the team and the Baconton Power LLC staff would be informed.

Company Profile

SOWEGA and Baconton are Limited Liability Corporations (LLC). Each is governed by their respective board of directors. SOWEGA is owned by SOWEGA Energy Resources LLC. Baconton is owned 65% by SOWEGA Energy Resources and 35% by Tejas Power Generation, a

company owned by Royal Dutch Shell. Both SOWEGA and Baconton are classified by FERC as Exempt Wholesale Generators. The Companies headquarters are located in Cairo, Georgia and its operation facilities are located in Mitchell County, Georgia.

The operations facilities are located in Mitchell County, Georgia and are approximately 20 miles south of Albany, Georgia. The operations facilities are a dual fueled simple-cycle facility and includes four General Electric (“GE”) model LM6000 gas turbine generator sets owned by the project owner, Baconton Power LLC (“Baconton”). These units began commercial operation in June, July and August 2000. Two additional LM6000 gas turbine generator sets are located on the Project site and are owned by another owner, SOWEGA Power LLC (“SOWEGA”). The SOWEGA gas turbine generator units have been financed through a separate transaction. Natural gas serves as the primary fuel for the Project, and low sulfur No. 2 fuel oil serves as back-up fuel. The normal net electric output of the Project is 194MW from the four Baconton units and 97 MW from the SOWEGA units.

Electrical capacity and energy produced by the facility is sold to Coral Power, LLC (“Coral Power”) under a 20-year tolling agreement. Coral Power supplies natural gas and fuel oil to the plant

The Project is connected to the Georgia Transmission Corporation (“GTC”) power grid through a 230 kV interconnection, which provides access to the Georgia Integrated Transmission System. Gum Pond LLC (“Gum Pond”) supplies raw water for the Project through a Water Supply and Disposal Agreement, which will remain in effect for a nominal term of thirty years. The water comes from a groundwater well located within the Project site, and the water is used for power augmentation, inlet air chilling and nitrous oxide control purposes.

Audit Specifics

The compliance audit was conducted on September 25, 2007 at Baconton Power LLC/SOWEGA Power LLC Operations Facility Mitchell County, Georgia.

Audit Team

| Audit Team Role | Name | Title | Company |
|-------------------|----------------|------------------------------|---------|
| Audit Team Leader | Bob Goss | Manager of Compliance Audits | SERC |
| Auditor | Mickey Bellard | Compliance Auditor | SERC |
| Auditor | Mike Vastano | Compliance Auditor | SERC |
| Member | Gene Delk | SERC Industry Volunteer | SCE&G |
| Member | Bob Ferguson | SERC Industry Volunteer | Ameren |

AUDIT RESULTS

The audit began at 8:15 a.m., September 25, 2007 with an opening presentation by Bob Goss, SERC Manager of Compliance Audits. He reviewed the NERC compliance plan for 2007 in general, and how it applied to Baconton Power LLC specifically. He introduced and reviewed the standards to be covered in the audit, and addressed both the expectations of Baconton Power LLC staff and the quality of evidence to be presented. He also covered the basic procedure for

the audit, and the bounding rules of conduct. Each member of the audit team was introduced and professional affiliation identified. His presentation was followed by a brief presentation covering the background of Baconton Power LLC and its compliance activities. The staff of Baconton Power LLC was introduced, and general housekeeping matters explained.

The audit team initially reviewed the registration status of Baconton Power LLC with Baconton Power LLC staff to verify application of each standard. Each standard's audit began with a recitation of each requirement and an explanation, if requested by Baconton Power LLC. Baconton Power LLC 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 Baconton Power LLC 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 Audit Worksheet.

After completing a review of all applicable requirements in the standard, the overall compliance to that standard was reviewed first by the team and Baconton Power LLC 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 Reliability Standard Audit Worksheet would be updated by the scribe with the compliance recommendation.

The review of all applicable standards was completed at approximately 3:00 p.m., September 25, 2007 and the audit team met to review and discuss the findings. Following these discussions, the scribe collected all notes and evidence as needed and began to finalize the Reliability Standard Audit Worksheet. The Audit Team Leader began to develop the Exit Briefing with the help of all team members by using his laptop screen. This facilitated the consensus of the full team on the content of the Exit Briefing, and re-affirmed the findings.

The Exit Briefing was presented to the assembled Audit Team and Baconton Power LLC staff at approximately 3:45 p.m., September 25, 2007 and was followed by an informal response from the Baconton Power LLC staff. The Audit Team Leader solicited both informal comments from Baconton Power LLC staff, along with requesting that they fill out formal feedback forms for submission to SERC. The audit team left the Baconton Power LLC meeting room at approximately 4:45 p.m., September 25, 2007.

Findings

| Reliability Standard | Auditor Notes | Finding |
|-----------------------------|---|----------------|
| BAL-001-0 | Not Applicable – Baconton Power LLC is not a BA | NA |
| BAL-002-0 | Not Applicable – Baconton Power LLC is not a BA, RSG or RRO | NA |
| BAL-003-0 | Not Applicable – Baconton Power LLC is not a BA | NA |

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| Reliability Standard | Auditor Notes | Finding |
|-----------------------------|--|----------------|
| CIP-001-1 | Applies to Baconton Power LLC as currently registered. Concerning requirements 1, 2, 3 and 4 Baconton Power LLC submitted evidence in their Policies, Guidelines, and Procedures (PGP) Sabotage Reporting Procedure CIP-001 and other evidence. Baconton Power LLC was found by the audit team to meet all standard requirements through the evidence provided. | Compliant |
| CIP-002-1 through CIP-009-1 | Applies to Baconton Power LLC as currently registered, but not covered in this audit | NA |
| COM-001-1 | Not Applicable – Baconton Power LLC is not a BA, TO or RC | NA |
| EOP-001-0 | Not Applicable – Baconton Power LLC is not a BA, TOP | NA |
| EOP-003-1 | Not Applicable – Baconton Power LLC is not a BA, TOP | NA |
| EOP-005-1 | Not Applicable – Baconton Power LLC is not a BA, TOP | NA |
| EOP-006-1 | Not Applicable – Baconton Power LLC is not a RC | NA |
| EOP-008-0 | Not Applicable – Baconton Power LLC is not a BA, TOP or RC | NA |
| EOP-009-0 | Applies to Baconton Power LLC as currently registered. However, Baconton Power LLC is not a blackstart plant in the region blackstart plan or does not have blackstart units, thus this standard was not assessed. | Not Assessed |
| FAC-003-1 | Not Applicable – Baconton Power LLC is not a RRO, TO | NA |
| FAC-008-1 | Applies to Baconton Power LLC as currently registered. Concerning requirements 1, 2 and 3 Baconton Power LLC provided evidence in the form of the document entitled Policies, Guidelines, and Procedures (PGP) Facility Ratings Methodology FAC -008-009 and other procedures. Baconton Power LLC was found by the audit team to meet all standard requirements through the evidence provided. | Compliant |
| FAC-009-1 | Applies to Baconton Power LLC as currently registered. Concerning requirements 1 and 2 Baconton Power LLC provided evidence in the form of the document entitled Policies, Guidelines, and Procedures (PGP) Facility Ratings Methodology FAC -008-009 and other procedures. Baconton Power LLC was found by the audit team to meet all standard requirements through the evidence provided. | Compliant |

| Reliability Standard | Auditor Notes | Finding |
|-----------------------------|---|----------------|
| IRO-001-1 | Applies to Baconton Power LLC, as currently registered since not a Reliability Coordinator or Regional Reliability Organization, requirement 8 was the only requirement applicable to Baconton Power LLC. Baconton Power LLC provided evidence with the document Policies, Guidelines, and Procedures (PGP) Reliability Coordination and Responsibility IRO-001 & TOP-001 and other evidence. Baconton Power LLC was found by the audit team to meet all standard requirements through the evidence provided. | Compliant |
| IRO-004-1 | Applies to Baconton Power LLC as currently registered, since not a Reliability Coordinator requirement 4 was the only requirement applicable to Baconton Power LLC. Baconton Power LLC provided evidence with the document Policies, Guidelines, and Procedures (PGP) Operations Planning Information for Reliability Coordination IRO-004 and other evidence. Baconton Power LLC was found by the audit team to meet all standard requirements through the evidence provided. | Compliant |
| IRO-014-1 | Not Applicable – Baconton Power LLC is not a RC | NA |
| IRO-015-1 | Not Applicable – Baconton Power LLC is not a RC | NA |
| IRO-016-1 | Not Applicable – Baconton Power LLC is not a RC | NA |
| PER-002-0 | Not Applicable – Baconton Power LLC is not a BA or TOP | NA |
| PER-003-0 | Not Applicable – Baconton Power LLC is not a BA, TOP or RC | NA |
| PER-004-1 | Not Applicable – Baconton Power LLC is not a RC | NA |
| PRC-004-1 | Applies to Baconton Power LLC as currently registered. Requirement 1 is not applicable to a Generator Operator and Generator Owner. Concerning requirements 2 and 3 Baconton Power LLC provided evidence with the documents; Policies, Guidelines, and Procedures (PGP) Protection System Maintenance, Testing, Misoperations and Coordination PRC-001, PRC-004 & PRC-005. Also Baconton Power LLC did not have any misoperations since commissioning of the plant. Baconton Power LLC has a procedure in place if Baconton Power LLC does have a misoperation. Baconton Power LLC was found by the audit team to meet all standard requirements through the evidence provided. | Compliant |

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| Reliability Standard | Auditor Notes | Finding |
|-----------------------------|--|----------------|
| PRC-005-1 | Applies to Baconton Power LLC as currently registered. Concerning requirements 1 and 2 Baconton Power LLC provided evidence with the following documents; Policies, Guidelines, and Procedures (PGP) Protection System Maintenance, Testing, Misoperations and Coordination PRC-001, PRC-004 & PRC-005, also station battery testing log and preventative maintenance work orders. Baconton Power LLC was found by the audit team to meet all standard requirements through the evidence provided. | Compliant |
| PRC-008-0 | Not Applicable – Baconton Power LLC is not a TO or DP | NA |
| PRC-010-0 | Not Applicable – Baconton Power LLC is not a TO, DP,LSE or TOP | NA |
| PRC-011-0 | Not Applicable – Baconton Power LLC is not a TO or DP | NA |
| PRC-016-0 | Applies to Baconton Power LLC as currently registered. However, Baconton Power LLC does not have an SPS thus this standard was not assessed | Not Assessed |
| PRC-017-0 | Applies to Baconton Power LLC as currently registered. However, Baconton Power LLC does not have an SPS thus this standard was not assessed. | Not Assessed |
| PRC-021-1 | Not Applicable – Baconton Power LLC is not a TO or DP | NA |
| TOP-003-0 | Applies to Baconton Power LLC as currently registered Concerning requirements 1, 2, 3,and 4, Baconton Power LLC provided evidence with the following documentation; Policies, Guidelines, and Procedures (PGP) Operations Planning and Outage Coordination TOP-002, 003 & 006 and Daily GSOC Report spreadsheet by 0900 EPT. Baconton Power LLC was found by the audit team to meet all standard requirements through the evidence provided. | Compliant |
| TOP-004-1 | Not Applicable – Baconton Power LLC is not a TOP | NA |
| TOP-005-1 | Not Applicable – Baconton Power LLC is not a BA, TOP, RC or PSE | NA |
| TOP-007-0 | Not Applicable – Baconton Power LLC is not a TOP or RC | NA |
| TPL-001-0 | Not Applicable – Baconton Power LLC is not a PA or TPL | NA |
| TPL-002-0 | Not Applicable – Baconton Power LLC is not a PA or TPL | NA |
| TPL-003-0 | Not Applicable – Baconton Power LLC is not a PA or TPL | NA |

| Reliability Standard | Auditor Notes | Finding |
|-----------------------------|---|----------------|
| TPL-004-0 | Not Applicable – Baconton Power LLC is not a PA or TPL | NA |
| VAR-001-1 | Not Applicable – Baconton Power LLC is not a PSE or TOP | NA |

Conclusions

The Baconton Power LLC electric utility operation was found to be in compliance with the standards that were audited, and exhibited a strong desire and willingness to continue improvement of their compliance effort in the future. The staff at Baconton Power LLC was very well prepared and very courteous.

Summary of Baconton power, LLC Response to the Audit Findings

Baconton Power, LLC did not submit a statement in response to the audit findings.

Appendix 1 — Applicable Reliability Standards

| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to Baconton Power LLC? 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 |

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| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to Baconton Power LLC? Yes or 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. | 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 |

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| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to Baconton Power LLC? Yes or 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 |
| 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 five 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 |

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| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to Baconton Power LLC? Yes or 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 |
| 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. | 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 |

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|-----------|--------------|--|--------------------------------------|--|----------------------|---|
| 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 |

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|--------------|---------------------|---|-------------|---|--|--|
| 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 | 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 |

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|--------------|---------------------|---|-------------|--|--|--|
| 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 | 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 |

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| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to Baconton Power LLC? Yes or 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 |
| 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. | 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 | Undervoltage 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 |

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|--------------|---------------------|---|------------------|--|--|--|
| 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 |
| 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 |

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

| Std # | Requirements | Standard | Who | Purpose | Monitoring Timeframe | Applicable to Baconton Power LLC? Yes or 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 |
| 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 |