



Compliance Audit Report Public Version

**Doyle 1, LLC (Doyle)
(NCR01216)
September 27, 2007**

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

October 22, 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 Doyle 1, LLC was audited on September 27, 2007 for compliance to the requirements contained in the NERC Reliability Standards that are currently enforceable and apply to the Doyle 1, LLC electric utility operation. This audit focused on documents and other evidence provided to SERC by the staff of the Doyle 1, 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 Doyle 1, 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 Doyle 1, LLC as subject to this audit. Doyle 1, LLC staff responded by providing evidence in the form of reports, procedures, studies, and other documents. Doyle 1, 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 Doyle 1, LLC was judged to be compliant. Likewise, if any of the requirements or sub-requirements were not fully met, then Doyle 1, 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 Doyle 1, LLC electric utility operation was found to be in compliance with the standards that were audited with exceptions as shown below, and exhibited a strong desire and willingness to continue improvement of their compliance effort in the future. However, one possible area of violation of the audited standards was noted during the audit and at the exit briefing. One Possible Violation of CIP-001-1 - Sabotage Reporting, requirement 4 to confirm that Doyle 1, LLC has established communications contacts with the local FBI office.

The possible compliance violation will be processed through the SERC Compliance Monitoring and Enforcement Program. Any further actions related to possible compliance violations will be through that process.

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:

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

- Independently and objectively review Doyle 1, LLC compliance with the requirements of the reliability standards that are applicable to Doyle 1, LLC based on the Doyle 1, LLC functions in the bulk electric system as determined by SERC.
- Validate compliance with applicable reliability standards from the NERC 2007 Implementation Plan list of actively monitored standards.

Scope

The scope of the audit of Doyle 1, LLC was to look at all Generator Owner and Generator Operator standards that are in the NERC 2007 Compliance Monitoring and Enforcement Plan. Of the 19 standards that apply to Doyle 1, LLC, 11 were selected for review in this audit. Of these 11 standards 3 standards were not assessed; see finding 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 Doyle 1, LLC in the NERC 2007 Enforcement Plan. These standards were grouped and scheduled during the day to make the most efficient use of the Doyle 1, LLC staff's time. The Doyle 1, 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 Doyle 1, LLC. The audit team had a moderator who would initiate dialogue on each standard requirement, request compliance evidence, and document the evidence and Doyle 1, LLC staff response. This was done by asking Doyle 1, 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 Doyle 1, LLC as subject to this audit. Doyle 1, LLC staff responded by providing evidence in the form of reports, procedures, studies, and other documents. Doyle 1, 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 Doyle 1, 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 Doyle 1, LLC did not have sufficient evidence to support a finding of compliance, a possible violation was identified by the team and the Doyle 1, LLC staff was informed.

Company Profile

Doyle 1, LLC (Doyle) is wholly owned by Walton EMC. The Doyle Generating Facility is the only generation asset run/owned by Doyle 1, LLC. It is a stand alone power plant which currently has six employees. All are dedicated to achieving compliance with the applicable NERC Reliability Standards.

Doyle 1, LLC is part of the Oglethorpe Power Corporation system (OPC). It is dispatched by Georgia System Operation Corporation (GSOC). Doyle 1, LLC is a summer-peaking power plant averaging approximately 10 starts/150 fired hours on each CT over the summer peak

Doyle 1, LLC is connected to the OPC system through the Georgia Transmission Corporation (GTC) network. GTC is part of the Georgia Integrated Transmission System (ITS) with Southern Company, Municipal Electric Corporation of Georgia and the City of Dalton. Doyle 1, LLC units 1–3 are connected to the 115 kV system and units 4 and 5 are connected to the 230 kV system.

Doyle 1, LLC consists of five simple cycle combustion turbines. The makeup of the units is as follows:

Unit	Type	Name Plate	Base	Peak
1	GE Frame 7B/E	64 MW	59 MW	64 MW
2	GE Frame 7B	65 MW	62 MW	65 MW
3	GE Frame 7B/E	65 MW	62 MW	65 MW
4	GE Frame 7EA	80 MW	74 MW	80 MW
5	GE Frame 7EA	81 MW	75 MW	81 MW

Doyle 1, LLC is part of the OPC generation pool. OPC Member systems receive a portion of their power from the OPC generation pool.

Audit Specifics

The compliance audit was conducted on September 27, 2007 at the Doyle 1, LLC Generating Plant, 1318 Gratis Road, Monroe, Georgia, 30656.

Audit Team

Audit Team Role	Name	Title	Company
Lead	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
Member	Earl Shockley	Regional Compliance Program Coordinator	NERC

AUDIT RESULTS

The audit began at 8:15 a.m., September 27, 2007 with an opening presentation by Bob Goss, Audit Team Leader (ATL) and SERC Manager of Compliance Audits. He reviewed the NERC compliance plan for 2007 in general, and how it applied to Doyle 1, LLC specifically. He introduced and reviewed the standards to be covered in the audit, and addressed both the expectations of Doyle 1, 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 Doyle 1, LLC and its compliance activities. The staff of Doyle 1, LLC was introduced, and general housekeeping matters explained.

The audit team initially reviewed the registration status of Doyle 1, LLC with Doyle 1, 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 the Doyle 1, LLC staff. The Doyle 1, 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 the Doyle 1, 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 (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 Doyle 1, LLC staff, and then by the ATL. Any concerns or dissention with the recommendation was offered, and the ATL would indicate support or disagreement with the recommendation. Dialogue would ensue to the point of decision on the part of the ATL. Following this review, the RSAW would be updated by the scribe with the compliance recommendation.

The review of all applicable standards was completed at approximately 1:30 p.m., September 27, 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 RSAW's. The ATL began to develop the exit briefing with the help of all team members by using a TV Screen connected to his laptop. This facilitated the consensus of the full team on the content of the exit briefing, and re-affirmed the findings and recommendations.

The exit briefing was presented to the assembled Audit Team and Doyle 1, LLC staff at approximately 3:15 p.m., September 27, 2007 and was followed by an informal response from the Doyle 1, LLC staff. The ATL solicited both informal comments from Doyle 1, LLC staff, along with requesting that they fill out formal feedback forms for submission to SERC. The audit team left the Doyle 1, LLC meeting room at approximately 4:00 p.m., September 27, 2007.

Findings

Reliability Standard	Auditor Notes	Finding
BAL-001-0	Not Applicable – Doyle 1 LLC is not a BA	NA
BAL-002-0	Not Applicable – Doyle 1 LLC is not a BA, RSG or RRO	NA
BAL-003-0	Not Applicable – Doyle 1 LLC is not a BA	NA

Reliability Standard	Auditor Notes	Finding
CIP-001-1	<p>Applies to Doyle 1, LLC as currently registered.</p> <p>Regarding requirements 1, 2 and 3 Doyle 1, LLC submitted evidence in their Sabotage Reporting Procedure PGP CIP-001 and the Doyle Emergency Action Plan. Doyle 1, LLC was found by the audit team to meet standard requirements 1, 2 and 3 through the evidence provided. The employees are aware of and have been trained in these procedures.</p> <p>Regarding requirement 4; the team determined a Possible Alleged Violation. The requirement regarding the Generator Operator, that they shall establish communications contacts with the local Federal Bureau of Investigation (FBI) officials and to develop reporting procedures as appropriate to their circumstances. The entity has telephone numbers in the procedure for the Federal Bureau of Investigation (FBI), but these telephone numbers had not been verified. Also, Doyle1, LLC personnel thought that they were in compliance because of the following:</p> <p>The plant manager and plant supervisor have participated in the local county homeland security meetings with local law enforcement officials and first responders. The plant supervisor stated that at least annually the sheriffs department and local fire department, who are the first responders, visit the plant and also meet with employees.</p> <p>During the meeting the Sheriffs department told the plant management in conversations with them that they must call the Sheriffs department first (politics involved) and then the Sheriffs department will call the Federal Bureau of Investigation (FBI). The Sheriffs department and fire department are the first responders and this would alleviate any confusion. There was no documentation to substantiate this. Plant management was given the opportunity to obtain the documentation to substantiate but could not.</p> <p>The audit team deliberated on the issue and there was some dissention. However, the ATL yielded a decision of a Possible Alleged Violation was made for requirement 4.</p>	Possible Violation

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Reliability Standard	Auditor Notes	Finding
CIP-002-1 through CIP-009-1	Applies to Doyle 1, LLC as currently registered but not covered in this audit scope	NA
COM-001-1	Not Applicable – Doyle 1, LLC is not a BA,TO or RC	NA
EOP-001-0	Not Applicable – Doyle 1, LLC is not a BA, TOP	NA
EOP-003-1	Not Applicable – Doyle 1, LLC is not a BA, TOP	NA
EOP-005-1	Not Applicable – Doyle 1, LLC is not a BA, TOP	NA
EOP-006-1	Not Applicable – Doyle 1, LLC is not a RC	NA
EOP-008-0	Not Applicable – Doyle 1, LLC is not a BA, TOP or RC	NA
EOP-009-0	Applies to Doyle 1, LLC as currently registered. However Doyle 1, 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 – Doyle 1, LLC is not a RRO,TO	NA
FAC-008-1	Applies to Doyle 1, LLC as currently registered. Concerning requirements 1, 2 and 3 Doyle 1, LLC provided evidence in the form of their documents entitled Facility Ratings Methodology PGP FAC-008-009, Doyle Confirmation Validation Procedure and other procedures. Doyle 1, LLC was found by the audit team to meet all standard requirements through the evidence provided.	Compliant
FAC-009-1	Applies to Doyle 1, LLC as currently registered. Concerning requirements 1 and 2 Doyle 1, LLC provided evidence in the form of their documents entitled Facility Ratings Methodology PGP FAC-008-009, OPC Resource data guide .xls spreadsheet and other procedures. Doyle 1, LLC was found by the audit team to meet all standard requirements through the evidence provided.	Compliant
IRO-001-1	Applies to Doyle 1, LLC as currently registered since not a Reliability Coordinator or Regional Reliability Organization, requirement 8 was the only requirement applicable to Doyle 1, LLC. Doyle 1, LLC provided evidence with the document Reliability Coordination and Responsibility PGP TOP-001 and IRO-001, Doyle Dispatch Procedures and other evidence. Doyle 1, 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
IRO-004-1	Applies to Doyle 1, LLC as currently registered since not an Reliability Coordinator, requirement 4 was the only requirement applicable to Doyle 1, LLC. Doyle 1, LLC provided evidence with the document Operations Planning Information for Reliability Coordination PGP IRO-004, Daily Dispatch Procedure from OPC and Walton EMC and other evidence. Doyle 1, LLC was found by the audit team to meet all standard requirements through the evidence provided.	Compliant
IRO-014-1	Not Applicable – Doyle 1 LLC is not a RC	NA
IRO-015-1	Not Applicable – Doyle 1 LLC is not a RC	NA
IRO-016-1	Not Applicable – Doyle 1 LLC is not a RC	NA
PER-002-0	Not Applicable – Doyle Power LLC is not a BA or TOP	NA
PER-003-0	Not Applicable – Doyle Power LLC is not a BA, TOP or RC	NA
PER-004-1	Not Applicable – Doyle 1 LLC is not a RC	NA
PRC-004-1	Applies to Doyle 1, LLC as currently registered. Requirement 1 is not applicable to a Generator Owner or Generator Operator. Concerning requirements 2 and 3 Doyle 1, LLC provided evidence with the document Protection System Maintenance, Testing, Misoperations and Coordination PGP PRC-001, PRC-004 & PRC-005. Also, Doyle 1, LLC did not have any misoperations. Doyle 1, LLC was found by the audit team to meet all standard requirements through the evidence provided.	Compliant
PRC-005-1	Applies to Doyle 1, LLC as currently registered. Concerning requirements 1 and 2 Doyle 1, LLC provided evidence with the following documents Protection System Maintenance, Testing, Misoperations and Coordination PGP PRC-001, PRC-004 & PRC-005, relay testing reports, Doyle Calibration Matrix .xls spreadsheet and battery test historical data. Doyle 1, LLC was found by the audit team to meet all standard requirements through the evidence provided.	Compliant
PRC-008-0	Not Applicable – Doyle 1, LLC is not a TO or DP	NA
PRC-010-0	Not Applicable – Doyle 1, LLC is not a TO, DP,LSE or TOP	NA
PRC-011-0	Not Applicable – Doyle 1, LLC is not a TO or DP	NA

Reliability Standard	Auditor Notes	Finding
PRC-016-0	Applies to Doyle 1, LLC as currently registered. However Doyle 1, LLC does not have an SPS thus this standard was not assessed	Not Assessed
PRC-017-0	Applies to Doyle 1, LLC as currently registered. However, Doyle 1, LLC does not have an SPS thus this standard was not assessed.	Not Assessed
PRC-021-1	Not Applicable – Doyle 1, LLC is not a TO or DP	NA
TOP-003-0	Applies to Doyle 1, LLC as currently registered. Concerning requirements 1, 2, 3 and 4, Doyle 1, LLC provided evidence with the following documentation Operations Planning and Outage Coordination PGP TOP-002, 003 & 006, OPC Resource Guide (CT1 – CT5 .xls format), demonstration of the live GSOC/OPC dashboard showing Doyle 1, LLC availability. Doyle 1, LLC was found by the audit team to meet all standard requirements through the evidence provided.	Compliant
TOP-004-1	Not Applicable – Doyle 1, LLC is not a TOP	NA
TOP-005-1	Not Applicable – Doyle 1, LLC is not a BA, TOP, RC or PSE	NA
TOP-007-0	Not Applicable – Doyle 1, LLC is not a TOP or RC	NA
TPL-001-0	Not Applicable – Doyle 1, LLC is not a PA or TPL	NA
TPL-002-0	Not Applicable – Doyle 1, LLC is not a PA or TPL	NA
TPL-003-0	Not Applicable – Doyle 1, LLC is not a PA or TPL	NA
TPL-004-0	Not Applicable – Doyle 1, LLC is not a PA or TPL	NA
VAR-001-1	Not Applicable – Doyle 1, LLC is not a PSE or TOP	NA

Conclusions

The Doyle 1, LLC electric utility operation was found to be in compliance with the standards that were audited, with the exceptions shown above, and exhibited a strong desire and willingness to continue improvement of their compliance effort in the future. The staff at Doyle 1, LLC was very well prepared as well as open and honest.

One possible area of violation was noted during the audit and the exit briefing. The Possible Alleged Violation of the Sabotage Reporting Standard (CIP-001-1) requirement 4 to confirm that Doyle 1, LLC has established communications contacts with the local Federal Bureau of Investigation (FBI) office was noted.

The Possible Alleged Violation, along with this compliance audit report, will be provided to the SERC compliance staff for processing through the NERC CMEP. Any further actions related to possible compliance violations will be through that process.

SUMMARY OF DOYLE 1, LLC RESPONSE TO THE AUDIT FINDINGS

Doyle 1, LLC agrees with the results of the audit findings. It has taken the appropriate measures to ensure compliance with CIP-001-1 R4.

APPENDIX 1 — APPLICABLE RELIABILITY STANDARDS

Std #	Requirements	Standard	Who	Purpose	Monitoring Timeframe	Applicable to Doyle 1 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 Doyle 1 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 Doyle 1 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 Doyle 1 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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Std #	Requirements	Standard	Who	Purpose	Monitoring Timeframe	Applicable to Doyle 1 LLC? 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

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Std #	Requirements	Standard	Who	Purpose	Monitoring Timeframe	Applicable to Doyle 1 LLC? Yes or No
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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Std #	Requirements	Standard	Who	Purpose	Monitoring Timeframe	Applicable to Doyle 1 LLC? Yes or 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	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.	No

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Std #	Requirements	Standard	Who	Purpose	Monitoring Timeframe	Applicable to Doyle 1 LLC? Yes or 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	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

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Std #	Requirements	Standard	Who	Purpose	Monitoring Timeframe	Applicable to Doyle 1 LLC? Yes or 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
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

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

Std #	Requirements	Standard	Who	Purpose	Monitoring Timeframe	Applicable to Doyle 1 LLC? Yes or 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

Determination Summary for Possible Violations Identified in an Audit

***Regional
Tracking Number*** 07-162

Entity Doyle I, LLC

Audit Date 9/27/2007

Standard CIP-001-1

Requirement R4

***Sufficient Basis
for Violation***

Factual Basis Facts: The Entity had not established communications contacts with the FBI. The Entity's procedures had the FBI phone number, but the number had not been verified and no direct contact had been made with the FBI. The entity stated that the local sheriff department had instructed them to contact them and they would contact the GBI and FBI.

***Conclusion
Violation
Summary*** Conclusion: Although the entity has a procedure addressing communication with the FBI, they could not provide evidence that they had actually established communications with the FBI. This is a violation of R4 as measured by M3 of CIP-001-1 and is a Level 1 non-compliance.

***NERC BOTCC
Determination*** The NERC BOTCC affirmed SERC Reliability Corporation's determination to exercise enforcement discretion to impose a zero dollar (\$0) penalty against Doyle 1, LLC, based upon the NERC BOTCC's review of the applicable requirements of the Commission-approved Reliability Standards and the underlying facts and circumstances of the violations at issue.

***NERC Violation
Number*** SERC200700012

NOC Number NOC-9

NOP Number NOP-9

***FERC Docket
Number*** NP08-20-000