



Compliance Audit Report Public Version

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**City of Orrville, Ohio
NERC ID# NCR08009**

Date of Audit: September 3-9, 2008

Date of Audit Report: November 6, 2008

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Executive Summary

An off-site compliance audit of the City of Orrville, Ohio was conducted from September 3, 2008 to September 9, 2008. At the time of the audit, the City of Orrville, Ohio was registered for the Distribution Provider (DP) function.

The audit team evaluated the City of Orrville, Ohio for compliance with seventeen (17) requirements and applicable sub requirements in eight (8) NERC Reliability Standards for the period of June 18, 2007 to September 9, 2008. The City of Orrville, Ohio submitted information and documentation to aid the audit team's evaluation of compliance with standards. The audit team reviewed and evaluated all information provided by the City of Orrville, Ohio to assess compliance with standards applicable to the DP function.

Based on the information and documentation provided by the City of Orrville, Ohio, the audit team made the determination that all seventeen (17) requirements in eight (8) NERC Reliability Standards were not applicable to the City of Orrville, Ohio. The audit team did not identify any possible compliance violations of NERC Reliability Standards. These results are further explained in the Audit Results section of this report which includes detailed information of the audit team's determination of applicability and compliance for the Reliability Standards within the scope of the compliance audit.

There were no ongoing mitigation plans and therefore none were reviewed by the audit team.

Audit Process

The compliance audit process steps are detailed in the NERC and ReliabilityFirst Compliance Monitoring and Enforcement Program (CMEP). The NERC and ReliabilityFirst CMEP generally conform to the United States Government Accountability Office Government Auditing Standards and other generally accepted audit practices.

Objectives

All registered NERC entities are subject to audit for compliance with all Reliability Standards applicable to the functions for which the entity is registered.

The audit objectives are to:

- Review the City of Orrville, Ohio's compliance with the requirements of Reliability Standards that are applicable to the City of Orrville, Ohio based on the function that the City of Orrville, Ohio is registered to perform.
- Validate compliance with applicable Reliability Standards from the NERC 2008 Implementation Plan list of actively monitored standards.
- Validate compliance with applicable Regional Standards from the ReliabilityFirst 2008 Implementation Plan list of actively monitored standards.
- Validate evidence of self-reported violations and previous self-certifications, confirm compliance with other requirements of the Reliability Standard, and review the status of associated mitigation plans.
- Document the City of Orrville, Ohio's compliance culture and its current Compliance Program.

Scope

The scope of the compliance audit included applicable NERC Reliability Standards in the NERC 2008 Implementation Plan.

At the time of the audit, the City of Orrville, Ohio was registered for the Distribution Provider (DP) function. The audit team evaluated the City of Orrville, Ohio for compliance with seventeen (17) requirements in eight (8) NERC Reliability Standards for the period of June 18, 2007 to September 9, 2008.

Confidentiality and Conflict of Interest

Confidentiality and Conflict of Interest of the audit team are governed under the ReliabilityFirst Delegation Agreement with NERC, and Section 1500 of the NERC Rules of Procedure. The City of Orrville, Ohio was informed of the ReliabilityFirst obligations and responsibilities under the agreement and procedures. The work history for each audit team member was provided to the City of Orrville, Ohio. The City of Orrville, Ohio was given an opportunity to object to an

audit team member on the basis of a possible conflict of interest or the existence of other circumstances that could interfere with an audit team member's impartial performance of duties. The City of Orrville, Ohio had not submitted any objections by the stated fifteen day objection due date and accepted the audit team member participants without objection.

Off-site Audit

The City of Orrville, Ohio is currently subject to a compliance audit at a minimum of once every six years per the NERC Compliance Audit Schedule. The City of Orrville, Ohio was provided with a sixty (60) day notification of this scheduled audit and at that time, all necessary documents required by the Reliability*First* audit process were provided.

The following documents were provided to the City of Orrville, Ohio as part of the notification:

- 60-day Notification letter which contained a request for evidence, information and data submittals
- Compliance Audit Survey
- Internal Compliance Program Survey
- Audit Agenda as applicable
- Audit Team Work History with discussion of objection process
- General Instructions for Data or Information Submittals
- Reliability Standard Auditor Worksheets (RSAWs)
- Reliability Standard Questionnaires

Documents were provided to the City of Orrville, Ohio in both electronic and hardcopy format.

Reliability*First* discussed the use of technical experts with the City of Orrville, Ohio and allowed their usage as deemed necessary by the City of Orrville, Ohio to provide the audit team an understanding of the evidence provided to demonstrate their compliance to the standards.

An audit agenda was provided to the City of Orrville, Ohio in advance to allow the necessary time to prepare for the audit. The City of Orrville, Ohio's cooperation and flexibility with the agenda was appreciated by the audit team.

At times, and according to the generally accepted government auditing standard 3.31, auditors are required to use professional judgment in planning, performing audits, attestation engagements and in reporting the results.

Additionally, and with the generally accepted government auditing standard 3.39, while this standard places responsibility on each auditor and audit organization to exercise professional judgment in planning and performing an audit or attestation engagement, it does not imply unlimited responsibility, nor does it imply infallibility on the part of either the individual auditor or the audit organization.

Professional judgment does not mean eliminating all possible limitations or weaknesses associated with a specific audit, but rather identifying, considering, minimizing, mitigating, and explaining them.

Methodology

ReliabilityFirst staff conducted the audit off-site from its Akron office. The audit team reviewed the information, evidence and data submitted by the City of Orrville, Ohio and assessed compliance with requirements of applicable Reliability Standards. The audit team requested and received, via email and phone conversations, additional information and clarification when the audit team determined it was necessary.

Opening Briefing

An Opening Briefing was conducted on September 3, 2008 via a conference call/Webex utilizing a PowerPoint presentation to discuss the following:

- Introduction of audit team
- Audit Objective and Scope
- Team Audit Expectations
- Discussion on Clarification Calls
- Audit Process
- Exit Briefing and schedule

Audit

The Audit team consisted of one ReliabilityFirst Compliance staff member and one contract auditor. The ReliabilityFirst Compliance staff member was designated as the audit team lead responsible for facilitating the audit process, serving as the primary contact person for the audit team, and completing the audit report. The audit team worked together to review evidence provided by the City of Orrville, Ohio and assessed compliance with the requirements of the standards that were audited. Requests for additional information, verification and clarification were communicated to the City of Orrville, Ohio primary contact through phone conversations and/or email. The City of Orrville, Ohio was NOT permitted to create new documents and or edit existing material and or documents that were previously provided as evidence.

Exit Briefing

The audit team conducted an exit briefing with the City of Orrville, Ohio on September 9, 2008 via a conference call/Webex utilizing a PowerPoint presentation. The primary and alternate

compliance contacts for the City of Orrville, Ohio participated in the exit briefing. The status of the off-site audit process was discussed, followed by the audit scope, preliminary audit findings, compliance audit report process, and feedback forms. No possible violations were identified during the audit and this was discussed in the preliminary results. The City of Orrville, Ohio was provided an opportunity to ask questions about the compliance findings that the audit team addressed.

Company Profile

At the time of the audit, the City of Orrville, Ohio was registered for the Distribution Provider (DP) function. The City of Orrville, Ohio is connected to the Bulk Electric System at 138kV at American Electric Power's (AEP) East Wooster substation, Wooster, Ohio. The City of Orrville, Ohio operates a distribution system that serves Orrville, Ohio and surrounding area supplying approximately 7000 customers with a summer peak load of approximately 58 megawatts.

Orrville Utilities is an active member of American Municipal Power-Ohio (AMP-Ohio), a non-profit corporation providing power supply and related services to 81 Ohio communities as well as members in Kentucky, Michigan, Pennsylvania, Virginia, & West Virginia.

Audit Specifics

1.

The compliance audit was conducted from September 3, 2008 to September 9, 2008 at the ReliabilityFirst offices in Akron, Ohio.

Audit Team Participants

Audit Team Role	Title
Team Lead	Senior Consultant, RFirst Compliance
Team Member	Consultant

City of Orrville, Ohio Audit Participants

Title	Organization
Electric Utility Manager	City of Orrville, Ohio
Staff Engineer	City of Orrville, Ohio

Audit Results

The audit team evaluated the City of Orrville, Ohio's compliance with the seventeen (17) requirements in eight (8) NERC Reliability Standards for the period since June 18, 2007. The audit team used data provided by the City of Orrville, Ohio to determine compliance with requirements in the eight (8) standards. Based on information provided by the City of Orrville, Ohio, of the seventeen (17) requirements in eight (8) Reliability Standards audited, all seventeen (17) requirements were determined to be not applicable. The audit team found that the City of

Orrville, Ohio did not have any possible violations of NERC Reliability Standards that were within the scope of the compliance audit.

The audit team carefully and methodically reviewed the submitted evidence and discussed findings as a team to determine if the evidence met the applicable requirements of the Reliability Standards. If the evidence was inadequate or did not cover all of the applicable requirements in the Reliability Standards, the audit team asked for additional evidence and/or clarification. The City of Orrville, Ohio provided a primary compliance contact for clarification of submittals through phone conversations and e-mail correspondence. Throughout the audit, the audit team members took notes on findings of evidence of compliance.

The audit team reviewed documentation in hardcopy and electronic forms provided by the City of Orrville, Ohio.

Findings

The following table details the findings for compliance with the Reliability Standards listed in the NERC 2008 Implementation Plan and/or selected for this audit:

Reliability Standard	Req.	Finding
PRC-004-1	R1. & R3.	N/A
PRC-005-1	R1.& sub Reqs & R2.& sub Reqs	N/A
PRC-008-0	R1. & R2.	N/A
PRC-010-0	R1.& sub Reqs & R2.	N/A
PRC-011-0	R1.& sub Reqs & R2	N/A
PRC-016-0	R1. & R2. & R3.	N/A
PRC-017-0	R1.& sub Reqs & R2.	N/A
PRC-021-1	R1.& sub Reqs & R2.	N/A

Compliance Culture

The City of Orrville, Ohio's compliance culture is exhibited in its internal NERC Reliability Standard Policy. This document states that it is the policy of the City of Orrville, Ohio to comply with the mandatory reliability standards approved by the Federal Energy Regulatory Commission. The City of Orrville, Ohio will comply with all reliability standards in accordance with the reliability functions for which the City of Orrville, Ohio has been designated by ReliabilityFirst Corporation or its successor organization and or the North American Electric Reliability Corporation or its successor organization.

Under this policy, the City of Orrville, Ohio has established a NERC Standard Compliance Team to coordinate their compliance efforts. The team is responsible for the initial writing, reviewing, and submission of policies and procedures for approval. The team will also be convened when necessary for the review of modifications to existing policies and procedures, or additional policies and procedures as required.

The Electric Utility Manager is designated as the Reliability Compliance Manager. He meets regularly with the Director of Utilities to review matters related to the Department and has the authority to meet with Executive Committees and the Board in the Director's absence.

The City of Orrville, Ohio's NERC Reliability Standard Policy requires that periodic self audits (at least once every 24 months) be performed to ensure the standards in place are met. If the internal audit team finds non-compliance to a requirement/standard, then a mitigation plan will be immediately prepared and a strategy implemented to correct the non compliance. The City of Orrville, Ohio will report the noncompliance to the standard and provide a mitigation plan to the ReliabilityFirst Regional Entity.