



Compliance Audit Report Public Version

**Ameren-Illinois (AMIL), Ameren-Missouri
(AMMO) and Ameren Services Company
(Ameren)**

**NCR01171/NRC01172/NRC01175
April 7-11, 2008**

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

May 28, 2008

TABLE OF CONTENTS

Executive Summary	3
Audit Process	3
<i>Objectives</i>	3
<i>Scope</i>	4
<i>Confidentiality and Conflict of Interest</i>	4
<i>On-site Audit</i>	4
<i>Methodology</i>	5
<i>Audit Overview</i>	5
<i>Audit</i>	5
<i>Exit Briefing</i>	6
<i>Company Profile</i>	6
<i>Audit Specifics</i>	7
Audit Results	8
<i>Findings</i>	9
<i>Compliance Culture</i>	15

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.

Ameren-Illinois (AMIL), Ameren-Missouri (AMMO) and Ameren Services Company (Collectively referred to hereafter as Ameren), were audited on April 7-11, 2008 for compliance with the requirements contained in the currently mandatory and enforceable Reliability Standards in the 2008 NERC Compliance Monitoring and Enforcement Program (CMEP) that are applicable to Ameren's registered functions. Ameren is registered with SERC Reliability Corporation (SERC) as a Balancing Authority (BA), Transmission Owner (TO), Transmission Operator (TOP), Transmission Planner (TP), Resource Planner (RP), Distribution Provider (DP), Generator Operator (GOP), Generator Owner (GO) and Load-Serving Entity (LSE). Forty-seven standards were selected and identified to Ameren as subject to review during this audit. The audit focused on documents and other evidence provided to SERC by the staff of Ameren, 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.

Ameren staff was requested to provide valid evidence of meeting each and every applicable requirement and sub-requirement contained in each standard that had been previously identified by SERC Compliance staff to Ameren as subject to this audit. Ameren staff responded by providing evidence in the form of reports, procedures, studies, and other documents. Ameren staff then cited specific portions of the evidence that demonstrated compliance. This evidence and the citations were documented and evaluated by the audit team to assess the level of compliance. If all of the requirements and sub-requirements of an audited standard were met, then Ameren was judged to be compliant. Likewise, if any of the requirements or sub-requirements were not fully met, then Ameren was judged to have a possible violation of the standard. A score of 100% is required for compliance.

The audit team determined that Ameren does not own or operate Under Voltage Load Shedding (UVLS) therefore, 3 of the 47 standards applicable to Ameren were not assessed. These standards are PRC-010-0, PRC-011-0 and PRC-021-1.

The audit team found Ameren to be in compliance with all of the NERC Reliability Standards included in the audit scope.

AUDIT PROCESS

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

Objectives

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

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

- Independently review Ameren compliance with the requirements of the reliability standards that are applicable to Ameren based on the Ameren registered functions.
- Validate compliance with applicable reliability standards from the NERC 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 Ameren compliance culture.

Scope

The scope of the audit of Ameren included all monitored standards that are in the NERC 2008 CMEP. Based on the confirmed registration of Ameren, the 47 Reliability Standards previously identified were the focus of the compliance audit. Of these 47 standards 3 standards; PRC-010-0, PRC-011-0 and PRC-021-1 were not assessed. This is detailed in the Audit Results section.

Note: For the 2008 compliance program, the monitoring period for the compliance audit will generally 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.

Confidentiality and Conflict of Interest

Code of conduct documentation for the NERC representative and regional entity staff were provided to Ameren in advance of the audit. Work history and conflict of interest forms submitted by each audit team member were provided to Ameren upon request. SERC has confirmed that confidentiality agreements have been executed by, and are on file for SERC Industry Volunteers. Ameren 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 the audit team member's impartial performance of duties. Ameren accepted the audit team member participants with no objections.

On-site Audit

Ameren was contacted by letter on October 22, 2007 by SERC staff. The letter provided Ameren with their initial notification of their upcoming audit in 2008, and the desire to schedule audit dates that would be acceptable to both parties. SERC staff then provided formal acknowledgement of the scheduled audit dates and requested that Ameren both verify their currently registered functions and complete and return an attached Pre-Audit Survey within 30 days.

On January 31, 2008, SERC staff forwarded an Audit Detail Letter to Ameren again, confirming the scheduled audit dates and confirming Ameren's registered functions within SERC. The Audit Detail Letter also provided Ameren with notice of the Standards in Audit Scope, Proposed Audit Schedule, Audit Team Roster (with industry affiliations), and requested that Ameren Subject Matter Experts (SMEs) responsible for and knowledgeable of compliance submittals be available for interview during the audit. In addition to the Audit Detail Letter, Ameren was provided with a Non-Disclosure Agreement Signature Verification for audit team members, a Pre-Audit Questionnaire, a list of Documents to be Provided or Have Available, and Reliability Standard Auditor Worksheets (RSAWs) for each standard to be audited.

Interviews with SMEs were requested, in conjunction with documented evidence, to provide the audit team with additional information or clarification as a basis for professional judgment when validating compliance with reliability standards.

Methodology

A team of auditors and SMEs were identified and conducted the audit of Ameren. The audit team was split into two sub-teams. The standards were grouped and scheduled for review to make the most efficient use of Ameren staff's time. Each sub-team had a moderator who initiated dialogue on each standard requirement and requested compliance evidence. This evidence and Ameren's staff response was documented. Ameren staff was requested to show valid evidence of meeting each applicable requirement and sub-requirement contained in the 47 standards that had been previously identified by SERC to Ameren as subject to this audit. Ameren staff responded by providing evidence in the form of reports, procedures, studies, and other documents. Ameren staff would then cite specific portions of the evidence that demonstrated compliance.

The evidence and the citations were documented by the scribe of each sub-team on the RSAWs 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 Ameren staff members until it was determined that each requirement was met by the cited evidence or other evidence offered.

Once all the evidence was presented and discussed, if Ameren did not provide sufficient evidence to support a finding of compliance, then a possible violation would have been identified by the team and Ameren staff would have been informed.

Audit Overview

The audit team arrived at the Ameren offices at 3:20 p.m., April 7, 2008. Each member of the audit team was introduced and professional affiliation identified. The staff of Ameren was introduced, and general housekeeping matters explained. The staff of Ameren was excused and the audit team reviewed team assignments and a general overview for preparation of the audit activities starting on the next day.

The audit team arrived at the Ameren offices at 7:45 a.m., April 8, 2008. At 8:15 a.m., April 8, 2008 Bob Goss, SERC Manager of Compliance Audits and Audit Team Lead (ATL), began the session with an opening presentation. Each member of the audit team was introduced and professional affiliation identified. He reviewed the NERC compliance plan for 2008 in general, and how it applied to Ameren specifically. The ATL introduced and reviewed the standards to be covered in the audit, and addressed both the expectations of Ameren staff and the quality of evidence to be presented. The ATL also covered the basic procedure for the audit, and the bounding rules of conduct. This was followed by a brief presentation covering the background of Ameren and its compliance activities.

Audit

The audit team initially reviewed Ameren's registration status with Ameren staff to verify applicability of each standard. Each standard's audit began with a recitation of each requirement. Ameren staff then presented evidence supporting requirement compliance, or cited evidence previously provided to the audit team. At that point, the evidence was reviewed and discussed until the team reached agreement on the evidence. By audit team consensus a determination of compliance was reached for each of the requirements, and communicated to Ameren 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 RSAW.

The review of all applicable standards was completed at approximately 3:00 p.m., April 10, 2008 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.

Exit Briefing

The ATL presented an exit briefing to the assembled audit team and entity staff at 9:00 a.m., April 11, 2008. This was followed by an informal response and questions from the Ameren staff. The exit briefing summarized the team preliminary conclusions, including any items of potential noncompliance or possible violation with supporting information, areas of concern, any added information required and the expected timeline for review and issuance of the audit report.

The ATL solicited both informal comments from Ameren staff, along with requesting that they fill out formal feedback forms for submission to NERC and SERC.

The audit team left the Ameren meeting room at 10:00 a.m., April 11, 2008.

Company Profile

Ameren Corporation is the parent of AmerenCILCO, based in Peoria, Ill; AmerenCIPS, based in Springfield, Ill.; AmerenIP, based in Decatur, Ill and AmerenUE, based in St. Louis, Mo.

Ameren was created by the December 1997 merger of CIPSCO Incorporated and Union Electric Company. In 2003, Ameren grew with the acquisition of CILCORP Inc parent of Central Illinois Light Company, now operating as AmerenCILCO, and in 2004, Ameren acquired Illinois Power Company — now operating as AmerenIP—from Dynegy Inc. Ameren employees, totaling approximately 9,000, provide energy services to approximately 2.4 million electric customers and nearly one million natural gas customers across 64,000 square miles in Illinois and Missouri.

AmerenCILCO provides electricity to approximately 215,000 customers in 19 counties, serving towns in east and central Illinois. Founded in 1913 through a series of mergers involving seven existing gas and electric companies, AmerenCILCO provides gas and electric services to Peoria and 26 surrounding communities.

AmerenCIPS provides electric service in 70 counties throughout a 20,500 square-mile area. Founded in 1902, AmerenCIPS today serves nearly 400,000 retail electric customers in 576 communities with a service territory that includes more than 7 percent of the state's population and 35 percent of its surface area — including Quincy and East St. Louis to the west and Mattoon and Marion to the east and south.

AmerenIP provides electric service to about 625,000 electric customers — an aggregate population of 1.4 million — in 313 incorporated municipalities across 15,000 square miles of central, east central and southern Illinois. AmerenIP provides service to nine cities with populations greater than 30,000, including Danville, Decatur, Belleville, Bloomington-Normal, Champaign-Urbana, Galesburg and Granite City.

AmerenUE provides electric service to approximately 1.2 million customers across central and eastern Missouri, including the greater St. Louis area. AmerenUE serves 65 Missouri counties and 500 towns. More than half (55 percent) of AmerenUE's electric customers are located in the St. Louis metropolitan area.

Ameren's net generating capacity of more than 16,200 megawatts (MW) is owned by Ameren UE and the non-rate regulated generation subsidiaries, AmerenEnergy Generating Company and AmerenEnergy Resources Generating, as well as Ameren's share of the Electric Energy, Inc., Joppa, Ill. generating facility.

Audit Specifics

The compliance audit was conducted on April 7-11, 2008 at the Ameren Headquarters in St. Louis, Missouri.

Audit Team

Audit Team Role	Name	Title	Company
Lead	Bob Goss	Manager Compliance Audits	SERC
Member	James Harrell	Senior Compliance Auditor	SERC
Member	Joe Spencer	Senior Compliance Auditor	SERC
Member	Mike Vastano	Compliance Auditor	SERC
Member	Bob Kenyon	Regional Compliance Program Coordinator	NERC
Member	Joe Finnegan	SERC Industry Subject Matter Expert	Dominion
Member	Sharma Kolluri	SERC Industry Subject Matter Expert	Entergy
Member	Wayne Pourciau	SERC Industry Subject Matter Expert	GSOC
Member	Anthony Williams	SERC Industry Subject Matter Expert	Duke Energy Carolinas

Ameren Audit Participants Title and Organization

Title	Ameren Organization
Vice President, Transmission	Ameren Services
Manager, Reliability Standards Compliance	Ameren Services
Manager, Electric Planning	Ameren Services
Manager, Transmission Operations	Ameren Services
Transmission Policy Specialist	Ameren Services
Manager, FERC Regulatory Policy	Ameren Services
Superintendent, Transmission Operations	Ameren Services
Transmission Operations Supervisor	Ameren Services
Project Engineer, Generation Project Engineering	Ameren Services
Managing Supervisor, Quality Management Services	Ameren UE
Engineer, Project Engineering	Ameren UE
Managing Supervisor Electrical Engineering	Ameren UE
Consulting Engineer, Quality Management Services	Ameren UE
Supervising Engineer, System Protection	Ameren Services
Consulting Engineer, System Protection	Ameren Services
Managing Supervisor	Ameren UE
Asset and Trading Optimization Specialist	Ameren Energy Marketing
Technical Training Supervisor	Ameren Services
Senior Transmission Operations Supervisor	Ameren Services
Supervising Engineer, Technical Support	Ameren Services
Senior Transmission Operations Supervisor	Ameren Services

Title	Ameren Organization
Supervising Engineer, Trans Svcs Bus Ctr	Ameren Services
Business Operations Analyst	Ameren Energy Marketing
Supervising Engineer Operations Planning	Ameren Services
Consulting Engineer, Building Services	Ameren Services
Engineer, Transmission Planning	Ameren Services
Principal Engineer, Transmission Planning	Ameren Services
Superintendent, Vegetation Management	Ameren Services
Manager, Resource Management	Ameren Services
Consulting Engineer, Operations Planning	Ameren Services
Consulting Engineer, Transmission Planning	Ameren Services
Consulting Engineer, Transmission Planning	Ameren Services
Consulting Engineer, Transmission Planning	Ameren Services
Consulting Engineer, Transmission Planning	Ameren Services
Supervising Engineer, Transmission Planning	Ameren Services
Managing Supervisor, Asset Mgmt & Trading	Ameren UE
Regulatory Specialists, Govt Relations	Ameren Services
Supervisor, System Relay Services	Ameren Services

AUDIT RESULTS

The audit team found Ameren to be in compliance with all of the NERC Reliability Standards in the audit scope. Please see Findings Table.

Findings

Reliability Standard	Requirement	Finding
BAL-001-0	R1.	Compliant
BAL-001-0	R2.	Compliant
BAL-001-0	R3.	N/A
BAL-001-0	R4.	N/A
BAL-002-0	R1.	Compliant
BAL-002-0	R2.	N/A
BAL-002-0	R3.	Compliant
BAL-002-0	R4.	Compliant
BAL-002-0	R5.	N/A
BAL-002-0	R6.	Compliant
BAL-003-0	R1.	Compliant
BAL-003-0	R2.	Compliant
BAL-003-0	R3.	Compliant
BAL-003-0	R4.	Not Assessed
BAL-003-0	R5.	Compliant
BAL-003-0	R6.	Not Assessed
BAL-004-0	R1.	N/A
BAL-004-0	R2.	N/A
BAL-004-0	R3.	Compliant
BAL-004-0	R4.	N/A
BAL-005-0	R1.	Compliant
BAL-005-0	R2.	Compliant
BAL-005-0	R3.	Not Assessed
BAL-005-0	R4.	Not Assessed
BAL-005-0	R5.	Not Assessed
BAL-005-0	R6.	Compliant
BAL-005-0	R7.	Compliant
BAL-005-0	R8.	Compliant
BAL-005-0	R9.	Compliant
BAL-005-0	R10.	Compliant
BAL-005-0	R11.	Compliant
BAL-005-0	R12.	Compliant
BAL-005-0	R13.	Compliant
BAL-005-0	R14.	Compliant
BAL-005-0	R15.	Compliant
BAL-005-0	R16.	Compliant
BAL-005-0	R17.	Compliant
BAL-006-1	R1.	Compliant
BAL-006-1	R2.	Compliant
BAL-006-1	R3.	Compliant
BAL-006-1	R4.	Compliant

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Reliability Standard	Requirement	Finding
BAL-006-1	R5.	Compliant
CIP-001-1	R1.	Compliant
CIP-001-1	R2.	Compliant
CIP-001-1	R3.	Compliant
CIP-001-1	R4.	Compliant
CIP-002-1 through CIP-009-1		Not Assessed
COM-001-1	R1.	Compliant
COM-001-1	R2.	Compliant
COM-001-1	R3.	Compliant
COM-001-1	R4.	Compliant
COM-001-1	R5.	Compliant
COM-001-1	R6.	N/A
COM-002-2	R1.	Compliant
COM-002-2	R2.	Compliant
EOP-001-0	R1.	Compliant
EOP-001-0	R2.	N/A
EOP-001-0	R3.	Compliant
EOP-001-0	R4.	Compliant
EOP-001-0	R5.	Compliant
EOP-001-0	R6.	Compliant
EOP-001-0	R7.	Compliant
EOP-002-2	R1.	Compliant
EOP-002-2	R2.	Compliant
EOP-002-2	R3.	Compliant
EOP-002-2	R4.	Compliant
EOP-002-2	R5.	Compliant
EOP-002-2	R6.	Compliant
EOP-002-2	R7.	Compliant
EOP-002-2	R8.	N/A
EOP-002-2	R9.	N/A
EOP-003-1	R1.	Compliant
EOP-003-1	R2.	Compliant
EOP-003-1	R3.	Compliant
EOP-003-1	R4.	Compliant
EOP-003-1	R5.	Compliant
EOP-003-1	R6.	Compliant
EOP-003-1	R7.	Compliant
EOP-003-1	R8.	Compliant
EOP-004-1	R1.	N/A
EOP-004-1	R2.	Compliant
EOP-004-1	R3.	Compliant
EOP-004-1	R4.	N/A

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Reliability Standard	Requirement	Finding
EOP-004-1	R5.	N/A
EOP-005-1	R1.	Compliant
EOP-005-1	R2.	Compliant
EOP-005-1	R3.	Compliant
EOP-005-1	R4.	Compliant
EOP-005-1	R5.	Compliant
EOP-005-1	R6.	Compliant
EOP-005-1	R7.	Compliant
EOP-005-1	R8.	Compliant
EOP-005-1	R9.	Compliant
EOP-005-1	R10.	Compliant
EOP-005-1	R11.	Compliant
EOP-006-1	R1.	N/A
EOP-006-1	R2.	N/A
EOP-006-1	R3.	N/A
EOP-006-1	R4.	N/A
EOP-006-1	R5.	N/A
EOP-006-1	R6.	N/A
EOP-008-0	R1.	Compliant
EOP-009-0	R1.	Compliant
EOP-009-0	R2.	Compliant
FAC-003-1	R1.	Compliant
FAC-003-1	R2.	Compliant
FAC-003-1	R3.	Compliant
FAC-003-1	R4.	Compliant
FAC-008-1	R1.	Compliant
FAC-008-1	R2.	Compliant
FAC-008-1	R3.	Compliant
FAC-009-1	R1.	Compliant
FAC-009-1	R2.	Compliant
FAC-013-1	R1.	N/A
FAC-013-1	R2.	N/A
INT-001-2	R1.	N/A
INT-001-2	R2.	Compliant
INT-003-2	R1.	Compliant
INT-004-1	R1.	N/A
INT-004-1	R2.	N/A
IRO-001-1	R1.	N/A
IRO-001-1	R2.	N/A
IRO-001-1	R3.	N/A
IRO-001-1	R4.	N/A
IRO-001-1	R5.	N/A

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Reliability Standard	Requirement	Finding
IRO-001-1	R6.	N/A
IRO-001-1	R7.	N/A
IRO-001-1	R8.	Compliant
IRO-001-1	R9.	N/A
IRO-003-2	R1.	N/A
IRO-003-2	R2.	N/A
IRO-004-1	R1.	N/A
IRO-004-1	R2.	N/A
IRO-004-1	R3.	Compliant
IRO-004-1	R4.	Compliant
IRO-004-1	R5.	N/A
IRO-004-1	R6.	N/A
IRO-004-1	R7.	Compliant
IRO-005-1	R1.	N/A
IRO-005-1	R2.	N/A
IRO-005-1	R3.	N/A
IRO-005-1	R4.	N/A
IRO-005-1	R5.	N/A
IRO-005-1	R6.	N/A
IRO-005-1	R7.	N/A
IRO-005-1	R8.	Compliant
IRO-005-1	R9.	Compliant
IRO-005-1	R10.	N/A
IRO-005-1	R11.	N/A
IRO-005-1	R12.	Compliant
IRO-005-1	R13.	Compliant
IRO-005-1	R14.	N/A
IRO-005-1	R15.	N/A
IRO-005-1	R16.	N/A
IRO-005-1	R17.	Compliant
IRO-006-3	R1.	N/A
IRO-006-3	R2.	N/A
IRO-006-3	R3.	N/A
IRO-006-3	R4.	N/A
IRO-006-3	R5.	N/A
IRO-006-3	R6.	Compliant
IRO-014-1	R1.	N/A
IRO-014-1	R2.	N/A
IRO-014-1	R3.	N/A
IRO-014-1	R4.	N/A
IRO-015-1	R1.	N/A
IRO-015-1	R2.	N/A

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Reliability Standard	Requirement	Finding
IRO-015-1	R3.	N/A
IRO-016-1	R1.	N/A
IRO-016-1	R2.	N/A
PER-002-0	R1.	Compliant
PER-002-0	R2.	Compliant
PER-002-0	R3.	Compliant
PER-002-0	R4.	Compliant
PER-003-0	R1.	Compliant
PER-004-1	R1.	N/A
PER-004-1	R2.	N/A
PER-004-1	R3.	N/A
PER-004-1	R4.	N/A
PER-004-1	R5.	N/A
PRC-004-1	R1.	Compliant
PRC-004-1	R2.	Compliant
PRC-004-1	R3.	Compliant
PRC-005-1	R1.	Compliant
PRC-005-1	R2.	Compliant
PRC-008-0	R1.	Compliant
PRC-008-0	R2.	Compliant
PRC-010-0	R1.	Not Assessed
PRC-010-0	R2.	Not Assessed
PRC-011-0	R1.	Not Assessed
PRC-011-0	R2.	Not Assessed
PRC-016-0	R1.	Compliant
PRC-016-0	R2.	Compliant
PRC-016-0	R3.	Compliant
PRC-017-0	R1.	Compliant
PRC-017-0	R2.	Compliant
PRC-021-1	R1.	Not Assessed
PRC-021-1	R2.	Not Assessed
TOP-002-2	R1.	Compliant
TOP-002-2	R2.	Compliant
TOP-002-2	R3.	Compliant
TOP-002-2	R4.	Compliant
TOP-002-2	R5.	Compliant
TOP-002-2	R6.	Compliant
TOP-002-2	R7.	Compliant
TOP-002-2	R8.	Compliant
TOP-002-2	R9.	Compliant
TOP-002-2	R10.	Compliant
TOP-002-2	R11.	Compliant

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Reliability Standard	Requirement	Finding
TOP-002-2	R12.	N/A
TOP-002-2	R13.	Compliant
TOP-002-2	R14.	Compliant
TOP-002-2	R15.	Compliant
TOP-002-2	R16.	Compliant
TOP-002-2	R17.	Compliant
TOP-002-2	R18.	Compliant
TOP-002-2	R19.	Compliant
TOP-003-0	R1.	Compliant
TOP-003-0	R2.	Compliant
TOP-003-0	R3.	Compliant
TOP-003-0	R4.	N/A
TOP-004-1	R1.	Compliant
TOP-004-1	R2.	Compliant
TOP-004-1	R3.	Compliant
TOP-004-1	R4.	Compliant
TOP-004-1	R5.	Compliant
TOP-004-1	R6.	Compliant
TOP-005-1	R1.	Compliant
TOP-005-1	R2.	N/A
TOP-005-1	R3.	Compliant
TOP-005-1	R4.	N/A
TOP-007-0	R1.	Compliant
TOP-007-0	R2.	Not Assessed
TOP-007-0	R3.	Compliant
TOP-007-0	R4.	N/A
TPL-001-0	R1.	Compliant
TPL-001-0	R2.	Compliant
TPL-001-0	R3.	Compliant
TPL-002-0	R1.	Compliant
TPL-002-0	R2.	Compliant
TPL-002-0	R3.	Compliant
TPL-003-0	R1.	Compliant
TPL-003-0	R2.	Compliant
TPL-003-0	R3.	Compliant
TPL-004-0	R1.	Compliant
TPL-004-0	R2.	Compliant
VAR-001-1	R1.	Compliant
VAR-001-1	R2.	Compliant
VAR-001-1	R3.	Compliant
VAR-001-1	R4.	Compliant
VAR-001-1	R5.	N/A

Confidential Information (including Privileged and
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Reliability Standard	Requirement	Finding
VAR-001-1	R6.	Compliant
VAR-001-1	R7.	Compliant
VAR-001-1	R8.	Compliant
VAR-001-1	R9.	Compliant
VAR-001-1	R10.	Compliant
VAR-001-1	R11.	Compliant
VAR-001-1	R12.	Compliant
VAR-002-1	R1.	Compliant
VAR-002-1	R2.	Compliant
VAR-002-1	R3.	Compliant
VAR-002-1	R4.	Compliant
VAR-002-1	R5.	Compliant

Compliance Culture

Information regarding the compliance culture of Ameren was obtained from other sources and has been documented.