



Compliance Audit Report Public Version

**Duke Energy Carolinas
NRC01219
April 21-24, 2008**

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

May 28, 2008

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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.

Duke Energy Carolinas(DEC) was audited on April 21-24, 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 DEC's registered functions. DEC is registered with SERC Reliability Corporation (SERC) as a Balancing Authority (BA), Transmission Owner (TO), Transmission Operator (TOP), Transmission Service Provider (TSP), Transmission Planner (TP), Resource Planner (RP), Distribution Provider (DP), Generator Operator (GOP), Generator Owner (GO), Load-Serving Entity (LSE), Purchasing-Selling Entity (PSE), Planning Authority (PA) and Reserve Sharing Group (RSG). Of the 57 standards identified as being applicable to DEC, 49 standards were selected and identified to DEC as subject to review during this audit. The audit focused on documents and other evidence provided to SERC by the staff of DEC, 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.

DEC 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 DEC as subject to this audit. DEC staff responded by providing evidence in the form of reports, procedures, studies, and other documents. DEC 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 DEC was judged to be compliant. Likewise, if any of the requirements or sub-requirements were not fully met, then DEC was judged to have a possible violation of the standard. A score of 100% is required for compliance.

The audit team determined that DEC does not own or operate Under Voltage Load Shedding or Special Protection Systems and therefore, 5 of the 49 standards applicable to DEC were not assessed. These standards are PRC-010-1, PRC-011-1, PRC-016-0, PRC-017-0 and PRC-021-1.

The audit team reviewed the status of compliance with a recently closed mitigation plan for NERC Reliability Standard PRC-005-1 and the progress of milestone completion for an open mitigation plan for Standard FAC-008-1.

The audit team found DEC to be in compliance with all of the NERC Reliability Standards 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:

- Independently review DEC compliance with the requirements of the reliability standards that are applicable to DEC based on the DEC 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 DEC compliance culture.

Scope

The scope of the audit of DEC included all monitored standards that are in the NERC 2008 CMEP and standard PRC-001-1. Based on the confirmed registration of DEC, the 49 Reliability Standards previously identified were the focus of the compliance audit. Of these 49 standards 5 standards; PRC-010-1, PRC-011-1, PRC-016-0, PRC-017-0 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 DEC in advance of the audit. Work history and conflict of interest forms submitted by each audit team member were provided to DEC upon request. SERC has confirmed that confidentiality agreements have been executed by, and are on file for SERC Industry Volunteers. DEC 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. DEC accepted the audit team member participants with no objections.

On-site Audit

DEC was contacted by letter on October 26, 2007 by SERC staff. The letter provided DEC 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 DEC both verify their currently registered functions and complete and return an attached Pre-Audit Survey within 30 days.

On February 16, 2008, SERC staff forwarded an Audit Detail Letter to DEC, again confirming the scheduled audit dates and confirming DEC's registered functions within SERC. The Audit Detail Letter also provided DEC with notice of the Standards in Audit Scope, Proposed Audit Schedule, Audit Team Roster (with industry affiliations), and requested that DEC 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, DEC was provided with a Non-

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

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 DEC. The audit team was split into two sub-teams. The standards were grouped and scheduled for review to make the most efficient use of DEC staff's time. Each sub-team had a moderator who initiated dialogue on each standard requirement and requested compliance evidence. This evidence and DEC's staff response was documented. DEC staff was requested to show valid evidence of meeting each applicable requirement and sub-requirement contained in the 49 standards that had been previously identified by SERC to DEC as subject to this audit. DEC staff responded by providing evidence in the form of reports, procedures, studies, and other documents. DEC staff would then cite specific portions of the evidence that demonstrated compliance.

This evidence and the citations were documented by the scribe of the 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 DEC 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 DEC did not provide sufficient evidence to support a finding of compliance, then a possible violation was identified by the team and DEC staff was informed.

Audit Overview

The audit team arrived at the DEC offices at 3:00 p.m., April 21, 2008. Each member of the audit team was introduced and professional affiliation identified. The staff of DEC was introduced, and general housekeeping matters explained. The staff of DEC 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 DEC offices at 7:45 a.m., April 22, 2008. At 8:00 a.m., April 22, 2008 James Harrell, Senior Compliance Auditor and Audit Team Lead (ATL), began the session with an opening presentation. He reviewed the NERC compliance plan for 2008 in general, and how it applied to DEC specifically. The ATL introduced and reviewed the standards to be covered in the audit, and addressed both the expectations of DEC 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. A brief presentation covering the background of DEC and its compliance activities took place.

Audit

The audit team initially reviewed the registration status of DEC with entity staff to verify applicability of each standard. Each standard's audit began with a recitation of each requirement. DEC 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 DEC 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 2:00 p.m., April 24, 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.

Exit Briefing

The ATL presented an exit briefing to the assembled audit team and entity staff at 4:00 p.m., April 24, 2008. This was followed by an informal response and questions from the DEC 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 DEC staff, along with requesting that they fill out formal feedback forms for submission to NERC and SERC.

The audit team and selected entity staff were dismissed from the meeting room at 4:45 p.m., on completion of the general exit briefing. The Audit Team Lead then provided DEC staff with an explanation of the correlation and effects of audit team findings in relation to open compliance activities currently in progress and addressed entity questions.

The audit team left the DEC meeting room at 5:45 p.m., April 24, 2008.

Company Profile

Duke Energy is an electric power holding company headquartered in Charlotte, NC. Under Duke Energy, U.S. Franchised Electric and Gas has electric operations in North Carolina, South Carolina, Ohio, Kentucky, and Indiana. The portion of the company serving the Carolinas is called Duke Energy Carolinas.

The Duke Energy Carolinas Balancing Area encompasses the upstate of South Carolina and central North Carolina covering approximately 20,000 square miles. Duke Energy Carolinas is part of the VACAR South Reliability Coordinator area which covers most of North and South Carolina. Duke operates a transmission system consisting of the following voltage levels: 500 kV, 230 kV, 161 kV, 138 kV, 115 kV, 100 kV, 66 kV, and 44 kV.

Duke Energy Carolinas has 6,996 MW of nuclear capacity, 7,754 MW of coal-burning capacity, 1,128 MW of conventional hydro capacity, 2,040 MW of pumped storage hydro capacity, and 3,266 MW of oil or gas combustion turbines for a total of 21,183 MW.

Audit Specifics

The compliance audit was conducted on April 21-24, 2008 at the DEC office in Charlotte, North Carolina.

Audit Team

| Audit Team Role | Name | Title | Company |
|------------------------|-----------------|-----------------------------------------|----------------------|
| Lead | James Harrell | Senior Compliance Auditor | SERC |
| Member | Sam Stryker | Manager Planning and Engineering | SERC |
| Member | Mike Vastano | Compliance Auditor | SERC |
| Member | Bob Kenyon | Regional Compliance Program Coordinator | NERC |
| Member | Bridget Coffman | SERC Industry Subject Matter Expert | Santee-Cooper |
| Member | Keith Comeaux | SERC Industry Subject Matter Expert | Louisiana Generating |
| Member | David Marler | SERC Industry Subject Matter Expert | TVA |
| Member | Joe Brown | SERC Industry Subject Matter Expert | Dominion |
| Member | Dewayne Scott | SERC Industry Subject Matter Expert | TVA |

DEC Audit Participants Title and Organization

| Title | DEC Organization |
|----------------------------------------------------------------|--------------------------------|
| Director, System Operations (SOC) | Duke Energy Corporation |
| Director, System Operations (Carolinas Transmission) | Duke Energy Corporation |
| Director, IT Telecommunications | Duke Energy Corporation |
| Director, System Protection Engineering | Duke Energy Corporation |
| Director, Reliability Services | Duke Energy Corporation |
| Director, Vegetation Management | Duke Energy Corporation |
| Director, Asset Mgmt (Transmission Planning) | Duke Energy Corporation |
| Director, System Performance | Duke Energy Corporation |
| GM, Substation Ops and Maintenance | Duke Energy Corporation |
| Manager, Performance Support (PM for SERC Audit) | Duke Energy Corporation |
| Manager, System Operations | Duke Energy Corporation |
| Manager, Critical Infrastructure Assets | Enterprise Protective Services |
| Compliance Program Manager | Duke Energy Corporation |
| Supervisor, Vegetation Program Mgmt | Duke Energy Corporation |
| Supervisor, Substation Ops and Maintenance | Duke Energy Corporation |
| Senior Information Security Analyst | Duke Energy Corporation |
| Senior Information Security Analyst (Project Manager NERC CIP) | Duke Energy Corporation |
| Consulting Engineer | Duke Energy Corporation |
| Senior Engineer | Duke Energy Corporation |
| Senior Engineer | Duke Energy Corporation |
| Senior Engineer (Planning) | Duke Energy Corporation |
| Senior Engineer | Duke Energy Corporation |
| Senior Engineer (Planning) | Duke Energy Corporation |
| Senior Engineer (Planning) | Duke Energy Corporation |
| Senior Engineer (Planning) | Duke Energy Corporation |
| Technical System Manager II | Duke Energy Corporation |
| Technical System Manager II | Duke Energy Corporation |
| Engineer III | Duke Energy Corporation |
| Training Specialist III | Duke Energy Corporation |

| Title | DEC Organization |
|-------------------------------------------------|-------------------------|
| Lead System Operator / Training | Duke Energy Corporation |
| System Coordinator | Duke Energy Corporation |
| System Coordinator | Duke Energy Corporation |
| Strategic Business Consultant (Vegetation Mgmt) | Duke Energy Corporation |

AUDIT RESULTS

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

Findings

| Reliability Standard | Requirement | Finding |
|-----------------------------|--------------------|----------------|
| BAL-001-0 | R1. | Compliant |
| BAL-001-0 | R2. | Compliant |
| BAL-001-0 | R3. | Not Assessed |
| BAL-001-0 | R4. | Not Assessed |
| BAL-002-0 | R1. | Compliant |
| BAL-002-0 | R2. | Compliant |
| BAL-002-0 | R3. | Compliant |
| BAL-002-0 | R4. | Compliant |
| BAL-002-0 | R5. | Compliant |
| 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. | NA |
| BAL-004-0 | R2. | NA |
| BAL-004-0 | R3. | Compliant |
| BAL-004-0 | R4. | Compliant |
| 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 |

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

| Reliability Standard | Requirement | Finding |
|-----------------------------|--------------------|----------------|
| 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 |
| 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. | Compliant |
| COM-002-2 | R1. | Compliant |
| COM-002-2 | R2. | Compliant |
| EOP-001-0 | R1. | Compliant |
| EOP-001-0 | R2. | Compliant |
| 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. | NA |
| EOP-002-2 | R9. | Compliant |
| EOP-003-1 | R1. | Compliant |
| EOP-003-1 | R2. | Compliant |

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| Reliability Standard | Requirement | Finding |
|-----------------------------|--------------------|----------------|
| 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. | NA |
| EOP-004-1 | R2. | Compliant |
| EOP-004-1 | R3. | Compliant |
| EOP-004-1 | R4. | NA |
| EOP-004-1 | R5. | NA |
| 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. | NA |
| EOP-006-1 | R2. | NA |
| EOP-006-1 | R3. | NA |
| EOP-006-1 | R4. | NA |
| EOP-006-1 | R5. | NA |
| EOP-006-1 | R6. | NA |
| 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. | NA |
| 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. | Compliant |
| FAC-013-1 | R2. | Compliant |

Confidential Information (including Privileged and
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| Reliability Standard | Requirement | Finding |
|-----------------------------|--------------------|----------------|
| INT-001-2 | R1. | Compliant |
| INT-001-2 | R2. | Compliant |
| INT-003-2 | R1. | Compliant |
| INT-004-1 | R1. | Compliant |
| INT-004-1 | R2. | Compliant |
| IRO-001-1 | R1. | NA |
| IRO-001-1 | R2. | NA |
| IRO-001-1 | R3. | NA |
| IRO-001-1 | R4. | NA |
| IRO-001-1 | R5. | NA |
| IRO-001-1 | R6. | NA |
| IRO-001-1 | R7. | NA |
| IRO-001-1 | R8. | Compliant |
| IRO-001-1 | R9. | NA |
| IRO-003-2 | R1. | NA |
| IRO-003-2 | R2. | NA |
| IRO-004-1 | R1. | NA |
| IRO-004-1 | R2. | NA |
| IRO-004-1 | R3. | Compliant |
| IRO-004-1 | R4. | Compliant |
| IRO-004-1 | R5. | NA |
| IRO-004-1 | R6. | NA |
| IRO-004-1 | R7. | Compliant |
| IRO-005-1 | R1. | NA |
| IRO-005-1 | R2. | NA |
| IRO-005-1 | R3. | NA |
| IRO-005-1 | R4. | NA |
| IRO-005-1 | R5. | NA |
| IRO-005-1 | R6. | NA |
| IRO-005-1 | R7. | NA |
| IRO-005-1 | R8. | Compliant |
| IRO-005-1 | R9. | NA |
| IRO-005-1 | R10. | NA |
| IRO-005-1 | R11. | NA |
| IRO-005-1 | R12. | Compliant |
| IRO-005-1 | R13. | Compliant |
| IRO-005-1 | R14. | NA |
| IRO-005-1 | R15. | NA |
| IRO-005-1 | R16. | NA |
| IRO-005-1 | R17. | NA |
| IRO-006-3 | R1. | NA |
| IRO-006-3 | R2. | NA |

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| Reliability Standard | Requirement | Finding |
|-----------------------------|--------------------|----------------|
| IRO-006-3 | R3. | NA |
| IRO-006-3 | R4. | NA |
| IRO-006-3 | R5. | NA |
| IRO-006-3 | R6. | Compliant |
| IRO-014-1 | R1. | NA |
| IRO-014-1 | R2. | NA |
| IRO-014-1 | R3. | NA |
| IRO-014-1 | R4. | NA |
| IRO-015-1 | R1. | NA |
| IRO-015-1 | R2. | NA |
| IRO-015-1 | R3. | NA |
| IRO-016-1 | R1. | NA |
| IRO-016-1 | R2. | NA |
| 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. | NA |
| PER-004-1 | R2. | NA |
| PER-004-1 | R3. | NA |
| PER-004-1 | R4. | NA |
| PER-004-1 | R5. | NA |
| PRC-001-1 | R1 | Compliant |
| PRC-001-1 | R2 | Compliant |
| PRC-001-1 | R3 | Compliant |
| PRC-001-1 | R4 | Compliant |
| PRC-001-1 | R5 | Compliant |
| PRC-001-1 | R6 | Not Assessed |
| 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. | Not Assessed |
| PRC-016-0 | R2. | Not Assessed |

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| Reliability Standard | Requirement | Finding |
|-----------------------------|--------------------|----------------|
| PRC-016-0 | R3. | Not Assessed |
| PRC-017-0 | R1. | Not Assessed |
| PRC-017-0 | R2. | Not Assessed |
| 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 |
| TOP-002-2 | R12. | Compliant |
| 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. | NA |
| 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. | Compliant |
| TOP-005-1 | R3. | Compliant |
| TOP-005-1 | R4. | Compliant |
| TOP-007-0 | R1. | Compliant |
| TOP-007-0 | R2. | Compliant |
| TOP-007-0 | R3. | Compliant |
| TOP-007-0 | R4. | NA |

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| Reliability Standard | Requirement | Finding |
|-----------------------------|--------------------|----------------|
| 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. | Compliant |
| 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 DEC was obtained from other sources and has been documented.