



# **Compliance Audit Report Public Version**

**LSP Energy Limited Partnership - (LSP)  
NCR01266  
March 4–6, 2008**

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

**March 13, 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> .....                          | 6  |
| Audit Results .....                                   | 7  |
| <i>Findings</i> .....                                 | 7  |
| <i>Compliance Culture</i> .....                       | 13 |

## 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.

LSP Energy Limited Partnership (LSP) was audited on March 4–6, 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 LSP's registered functions. LSP is registered with SERC Reliability Corporation (SERC) as a Generator Operator (GOP), Generator Owner (GO) and Transmission Owner (TO). Of the 29 standards identified as being applicable to LSP, 21 standards were selected and identified to LSP as subject to review during this audit. The audit focused on documents and other evidence provided to SERC by the staff of LSP, 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.

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

The audit team determined that LSP is not a blackstart capable facility and does not own or operate Under Frequency Load Shedding, Undervoltage Load Shedding or Special Protection Systems and therefore, seven of the twenty-one standards applicable to LSP were not assessed. These standards are EOP-009-0, PRC-008-0, PRC-010-0, PRC-011-0, PRC-016, PRC-017 and PRC-021-1.

LSP was found to be in compliance with all of the standards that were audited.

## 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.<sup>1</sup> The audit objectives are:

---

<sup>1</sup> North American Electric Reliability Corporation CMEP, paragraph 3.1, Compliance Audits

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

## **Scope**

The scope of the audit of LSP included all monitored standards that are in the NERC 2008 CMEP. Based on the confirmed registration of LSP, the 21 Reliability Standards previously identified were the focus of the compliance audit. Of these 21 standards, 7 standards, EOP-009-0, PRC-008-0, PRC-010-0, PRC-011-0, PRC-016, PRC-017 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 LSP in advance of the audit. Work history and conflict of interest forms submitted by each audit team member were provided to LSP upon request. SERC has confirmed that confidentiality agreements have been executed by, and are on file for SERC Industry Volunteers. LSP 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. LSP accepted the audit team member participants with no objections.

## **On-site Audit**

LSP was contacted by letter on October 16, 2007 by SERC staff. The letter provided LSP 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 LSP both verify their currently registered functions and complete and return an attached Pre-Audit Survey within 30 days.

On December 13, 2007, SERC staff forwarded an Audit Detail Letter to LSP, again confirming the scheduled audit dates and confirming LSP's registered functions within SERC. The Audit Detail Letter also provided LSP with notice of the Standards in Audit Scope, Proposed Audit Schedule, Audit Team Roster (with industry affiliations), and requested that LSP 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, LSP 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 LSP. The standards were grouped and scheduled for review to make the most efficient use of LSP staff's time. The audit team leader, Steve Gibe, initiated dialogue on each standard requirement and requested compliance evidence. This evidence and LSP's staff response was documented. LSP staff was requested to show valid evidence of meeting each applicable requirement and sub-requirement contained in the 21 standards that had been previously identified by SERC to LSP as subject to this audit. LSP staff responded by providing evidence in the form of reports, procedures, studies, and other documents. LSP staff would then cite specific portions of the evidence that demonstrated compliance.

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

### ***Audit Overview***

The audit team arrived at the LSP offices at 2:00 p.m., March 4, 2008. Each member of the audit team was introduced and professional affiliation identified. The staff of LSP 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 LSP offices at 7:45 a.m., March 5, 2008. The audit began at 8:00 a.m. with an opening presentation by Steve Gibe, SERC Senior Compliance Auditor and Audit Team Lead (ATL). He reviewed the NERC compliance plan for 2008 in general, and how it applied to LSP specifically. The ATL introduced and reviewed the standards to be covered in the audit, and addressed both the expectations of LSP 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. Each member of the audit team was introduced and professional affiliation identified. The ATL presentation was followed by a brief presentation covering the background of LSP and its compliance activities. The staff of LSP was introduced, and general housekeeping matters explained.

### ***Audit***

The audit team initially reviewed the registration status of LSP with entity staff to verify applicability of each standard. Each standard's audit began with a recitation of each requirement. LSP 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

LSP 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 3:25 p.m., March 5, 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 8:30 a.m., March 6, 2008. This was followed by an informal response and questions from the LSP staff. The exit briefing summarized the team's 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 LSP staff, along with requesting that they fill out formal feedback forms for submission to NERC and SERC.

The audit team left the LSP meeting room at 9:15 a.m., March 6, 2008.

### ***Company Profile***

The LSP Energy Limited Partnership's facility, located in Batesville, Mississippi, is owned and operated by Complete Energy Holdings, LLC. The facility consists of three gas-fired combined cycle generating units with a total generating capacity of 830 MW. LSP owns two 0.25 mile transmission lines with interconnections to Tennessee Valley Authority's transmission system at 161 kV, and at 230 kV to Entergy's transmission system.

The facility is located in two separate Balancing Authority areas. Units 1 and 2 are situated in the Batesville Balancing Authority footprint and Unit 3 is located in the Entergy Balancing Authority footprint. Batesville Balancing Authority's services are provided by Constellation Energy Control and Dispatch (CEDC). Power delivered into the Entergy Transmission system is dynamically scheduled to the Southeast Mississippi Electric Power Association (SMEPA) Balancing Authority.

### ***Audit Specifics***

The compliance audit was conducted on March 4–6, 2008 at the LSP facility in Batesville, Mississippi.

### **Audit Team**

| <b>Audit Team Role</b> | <b>Name</b>    | <b>Title</b>              | <b>Company</b> |
|------------------------|----------------|---------------------------|----------------|
| Lead                   | Steve Gibe     | Senior Compliance Auditor | SERC           |
| Member                 | James Harrell  | Senior Compliance Auditor | SERC           |
| Member                 | Joseph Spencer | Senior Compliance Auditor | SERC           |
| Member                 | John Wolfmeyer | Compliance Engineer       | SERC           |

## LSP Audit Participants

| Title            | LSP Organization                |
|------------------|---------------------------------|
| V.P. Development | Complete Energy Holdings, LLC   |
| V.P. Operations  | Complete Energy Holdings, LLC   |
| Asset Manager    | LSP Energy                      |
| O & M Manager    | LSP Energy                      |
| EHS Specialist   | LSP Energy                      |
| President        | Powersmiths International, Inc. |

## AUDIT RESULTS

The audit team found LSP 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.         | N/A       |
| BAL-001-0            | R2.         | N/A       |
| BAL-001-0            | R3.         | N/A       |
| BAL-001-0            | R4.         | N/A       |
| BAL-002-0            | R1.         | N/A       |
| BAL-002-0            | R2.         | N/A       |
| BAL-002-0            | R3.         | N/A       |
| BAL-002-0            | R4.         | N/A       |
| BAL-002-0            | R5.         | N/A       |
| BAL-002-0            | R6.         | N/A       |
| BAL-003-0            | R1.         | N/A       |
| BAL-003-0            | R2.         | N/A       |
| BAL-003-0            | R3.         | N/A       |
| BAL-003-0            | R4.         | N/A       |
| BAL-003-0            | R5.         | N/A       |
| BAL-003-0            | R6.         | N/A       |
| BAL-004-0            | R1.         | N/A       |
| BAL-004-0            | R2.         | N/A       |
| BAL-004-0            | R3.         | N/A       |
| BAL-004-0            | R4.         | N/A       |
| BAL-005-0            | R1.         | Compliant |
| BAL-005-0            | R2.         | N/A       |
| BAL-005-0            | R3.         | N/A       |
| BAL-005-0            | R4.         | N/A       |
| BAL-005-0            | R5.         | N/A       |

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

| <b>Reliability Standard</b>    | <b>Requirement</b> | <b>Finding</b> |
|--------------------------------|--------------------|----------------|
| BAL-005-0                      | R6.                | N/A            |
| BAL-005-0                      | R7.                | N/A            |
| BAL-005-0                      | R8.                | N/A            |
| BAL-005-0                      | R9.                | N/A            |
| BAL-005-0                      | R10.               | N/A            |
| BAL-005-0                      | R11.               | N/A            |
| BAL-005-0                      | R12.               | N/A            |
| BAL-005-0                      | R13.               | N/A            |
| BAL-005-0                      | R14.               | N/A            |
| BAL-005-0                      | R15.               | N/A            |
| BAL-005-0                      | R16.               | N/A            |
| BAL-005-0                      | R17.               | N/A            |
| BAL-006-1                      | R1.                | N/A            |
| BAL-006-1                      | R2.                | N/A            |
| BAL-006-1                      | R3.                | N/A            |
| BAL-006-1                      | R4.                | N/A            |
| BAL-006-1                      | R5.                | N/A            |
| CIP-001-1                      | R1.                | Compliant      |
| CIP-001-1                      | R2.                | Compliant      |
| CIP-001-1                      | R3.                | Compliant      |
| CIP-001-1                      | R4.                | Compliant      |
| CIP-002-1 through<br>CIP-009-1 |                    | Not Assessed   |
| COM-001-1                      | R2.                | N/A            |
| COM-001-1                      | R5.                | N/A            |
| COM-002-2                      | R1.                | Compliant      |
| COM-002-2                      | R2.                | N/A            |
| EOP-001-0                      | R1.                | N/A            |
| EOP-001-0                      | R2.                | N/A            |
| EOP-001-0                      | R3.                | N/A            |
| EOP-001-0                      | R4.                | N/A            |
| EOP-001-0                      | R5.                | N/A            |
| EOP-001-0                      | R6.                | N/A            |
| EOP-001-0                      | R7.                | N/A            |
| EOP-002-2                      | R1.                | N/A            |
| EOP-002-2                      | R2.                | N/A            |
| EOP-002-2                      | R3.                | N/A            |
| EOP-002-2                      | R4.                | N/A            |
| EOP-002-2                      | R5.                | N/A            |
| EOP-002-2                      | R6.                | N/A            |
| EOP-002-2                      | R7.                | N/A            |
| EOP-002-2                      | R8.                | N/A            |
| EOP-002-2                      | R9.                | N/A            |

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

| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| EOP-003-1                   | R1.                | N/A            |
| EOP-003-1                   | R2.                | N/A            |
| EOP-003-1                   | R3.                | N/A            |
| EOP-003-1                   | R4.                | N/A            |
| EOP-003-1                   | R5.                | N/A            |
| EOP-003-1                   | R6.                | N/A            |
| EOP-003-1                   | R7.                | N/A            |
| EOP-003-1                   | R8.                | N/A            |
| EOP-004-1                   | R1.                | N/A            |
| EOP-004-1                   | R2.                | Compliant      |
| EOP-004-1                   | R3.                | Compliant      |
| EOP-004-1                   | R4.                | N/A            |
| EOP-004-1                   | R5.                | N/A            |
| EOP-005-1                   | R1.                | N/A            |
| EOP-005-1                   | R2.                | N/A            |
| EOP-005-1                   | R3.                | N/A            |
| EOP-005-1                   | R4.                | N/A            |
| EOP-005-1                   | R5.                | N/A            |
| EOP-005-1                   | R6.                | N/A            |
| EOP-005-1                   | R7.                | N/A            |
| EOP-005-1                   | R8.                | N/A            |
| EOP-005-1                   | R9.                | N/A            |
| EOP-005-1                   | R10.               | N/A            |
| EOP-005-1                   | R11.               | N/A            |
| 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.                | N/A            |
| EOP-009-0                   | R1.                | Not Assessed   |
| EOP-009-0                   | R2.                | Not Assessed   |
| FAC-003-1                   | R1.                | Compliant      |
| FAC-003-1                   | R2.                | Compliant      |
| FAC-003-1                   | R3.                | Compliant      |
| FAC-003-1                   | R4.                | N/A            |
| 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      |

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

| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| FAC-013-1                   | R1.                | N/A            |
| FAC-013-1                   | R2.                | N/A            |
| INT-001-2                   | R1.                | N/A            |
| INT-001-2                   | R2.                | N/A            |
| INT-003-2                   | R1.                | N/A            |
| 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            |
| 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.                | N/A            |
| IRO-004-1                   | R4.                | Compliant      |
| IRO-004-1                   | R5.                | N/A            |
| IRO-004-1                   | R6.                | N/A            |
| IRO-004-1                   | R7.                | N/A            |
| 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.                | N/A            |
| IRO-005-1                   | R9.                | N/A            |
| IRO-005-1                   | R10.               | N/A            |
| IRO-005-1                   | R11.               | N/A            |
| IRO-005-1                   | R12.               | N/A            |
| IRO-005-1                   | R13.               | N/A            |
| IRO-005-1                   | R14.               | N/A            |
| IRO-005-1                   | R15.               | N/A            |
| IRO-005-1                   | R16.               | N/A            |
| IRO-005-1                   | R17.               | N/A            |

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

| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| 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.                | N/A            |
| 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            |
| IRO-015-1                   | R3.                | N/A            |
| IRO-016-1                   | R1.                | N/A            |
| IRO-016-1                   | R2.                | N/A            |
| PER-002-0                   | R1.                | N/A            |
| PER-002-0                   | R2.                | N/A            |
| PER-002-0                   | R3.                | N/A            |
| PER-002-0                   | R4.                | N/A            |
| PER-003-0                   | R1.                | N/A            |
| 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.                | Not Assessed   |
| PRC-008-0                   | R2.                | Not Assessed   |
| 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   |
| PRC-016-0                   | R3.                | Not Assessed   |
| PRC-017-0                   | R1.                | Not Assessed   |
| PRC-017-0                   | R2.                | Not Assessed   |
| PRC-021-1                   | R1.                | Not Assessed   |

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

| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| PRC-021-1                   | R2.                | Not Assessed   |
| TOP-002-2                   | R1.                | N/A            |
| TOP-002-2                   | R2.                | N/A            |
| TOP-002-2                   | R3.                | Compliant      |
| TOP-002-2                   | R4.                | N/A            |
| TOP-002-2                   | R5.                | N/A            |
| TOP-002-2                   | R6.                | N/A            |
| TOP-002-2                   | R7.                | N/A            |
| TOP-002-2                   | R8.                | N/A            |
| TOP-002-2                   | R9.                | N/A            |
| TOP-002-2                   | R10.               | N/A            |
| TOP-002-2                   | R11.               | N/A            |
| TOP-002-2                   | R12.               | N/A            |
| TOP-002-2                   | R13.               | Compliant      |
| TOP-002-2                   | R14.               | N/A            |
| TOP-002-2                   | R15.               | N/A            |
| TOP-002-2                   | R16.               | N/A            |
| TOP-002-2                   | R17.               | N/A            |
| TOP-002-2                   | R18.               | Compliant      |
| TOP-002-2                   | R19.               | N/A            |
| TOP-003-0                   | R1.                | Compliant      |
| TOP-003-0                   | R2.                | Compliant      |
| TOP-003-0                   | R3.                | Compliant      |
| TOP-003-0                   | R4.                | N/A            |
| TOP-004-1                   | R6.                | N/A            |
| TOP-005-1                   | R1.                | N/A            |
| TOP-005-1                   | R2.                | N/A            |
| TOP-005-1                   | R3.                | N/A            |
| TOP-005-1                   | R4.                | N/A            |
| TOP-007-0                   | R1.                | N/A            |
| TOP-007-0                   | R2.                | N/A            |
| TOP-007-0                   | R3.                | N/A            |
| TOP-007-0                   | R4.                | N/A            |
| TPL-001-0                   | R1.                | N/A            |
| TPL-001-0                   | R2.                | N/A            |
| TPL-001-0                   | R3.                | N/A            |
| TPL-002-0                   | R1.                | N/A            |
| TPL-002-0                   | R2.                | N/A            |
| TPL-002-0                   | R3.                | N/A            |
| TPL-003-0                   | R1.                | N/A            |
| TPL-003-0                   | R2.                | N/A            |
| TPL-003-0                   | R3.                | N/A            |

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

| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| TPL-004-0                   | R1.                | N/A            |
| TPL-004-0                   | R2.                | N/A            |
| VAR-001-1                   | R1.                | N/A            |
| VAR-001-1                   | R2.                | N/A            |
| VAR-001-1                   | R3.                | N/A            |
| VAR-001-1                   | R4.                | N/A            |
| VAR-001-1                   | R5.                | N/A            |
| VAR-001-1                   | R6.                | N/A            |
| VAR-001-1                   | R7.                | N/A            |
| VAR-001-1                   | R8.                | N/A            |
| VAR-001-1                   | R9.                | N/A            |
| VAR-001-1                   | R10.               | N/A            |
| VAR-001-1                   | R11.               | N/A            |
| VAR-001-1                   | R12.               | N/A            |
| 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 LSP was obtained from other sources and has been documented.