



Compliance Audit Report Public Version

**Union Power Partners, LP (UPP)
NCR01354
January 29-30, 2008**

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

February 12, 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.

Union Power Partners, LP (UPP) was audited on January 29 and 30, 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 UPP's registered functions. UPP is registered with SERC Reliability Corporation as a Generator Operator (GOP), Generator Owner (GO) and Purchasing-Selling Entity (PSE). Of the 28 standards identified as being applicable to UPP, 20 standards were selected and identified to UPP as subject to review during this audit. The audit focused on documents and other evidence provided to SERC by the staff of UPP, 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.

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

The audit team determined that UPP is not a blackstart capable facility and does not own or operate Special Protection Systems and therefore, three of the twenty standards applicable to UPP were not assessed. These standards are EOP-009, PRC-016-0 and PRC -017-0.

UPP was found to be in compliance with all but two of the standards that were audited. The audit team identified a possible violation of NERC Reliability Standard CIP-001-1, Sabotage Reporting requirement 4. The evidence presented showed the FBI was contacted January 18, 2008; however a gap was identified in their documentation of compliance that existed prior to that date. Further discussion with UPP revealed that the gap was identified in October 2007. The audit team has identified this possible violation as a documentation only issue. The audit team also identified a possible violation of NERC Standard PRC-005-1 requirement 1. The evidence presented was deficient in the following item: Station battery testing interval and basis were not shown in the procedure. Evidence was provided by UPP that the batteries had been tested; however the audit team has identified this possible violation as a documentation only issue.

The audit team acknowledges UPP's efforts in establishing their Reliability Standards Compliance Program, their strong commitment to compliance with the standards and to ensuring the reliability of the Bulk Electric System (BES).

This audit report includes information about how far UPP missed the requirements for the possible compliance violations. This information will be used to help determine the severity level

of sanctions and penalties. The possible compliance violations will be processed through the SERC CMEP. Any further actions related to possible compliance violations will be through that process.

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 UPP's compliance with the requirements of the reliability standards that are applicable to UPP based on the UPP 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 UPP compliance culture.

Scope

The scope of the audit of UPP included all monitored standards that are in the NERC 2008 CMEP. Based on the confirmed registration of UPP, the 28 Reliability Standards previously identified were the focus of the compliance audit. Of these 20 standards, 3 standards; EOP-009, PRC-016 and PRC-017 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 UPP in advance of the audit. Work history and conflict of interest forms submitted by each audit team member were provided to UPP upon request. SERC has confirmed that confidentiality agreements have been executed by, and are on file for SERC Industry Volunteers. UPP 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. UPP accepted the audit team member participants with no objections.

On-site Audit

UPP was contacted by letter on October 16, 2007 by SERC staff. The letter provided UPP with their initial notice of their upcoming audit in 2008, and the desire to schedule audit dates that

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

would be acceptable to both parties. SERC staff then provided formal acknowledgement of the scheduled audit dates and requested that UPP both verify their currently registered functions and complete and return an attached Pre-Audit Survey within 30 days.

On November 26, 2007, SERC staff forwarded an Audit Detail Letter to UPP, again confirming the scheduled audit dates and confirming UPP's registered functions within SERC. The Audit Detail Letter also provided UPP with notice of the Standards in Audit Scope, Proposed Audit Schedule, Audit Team Roster (with industry affiliations), and requested that UPP 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, UPP 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 were identified and conducted the audit of UPP. The standards were grouped and scheduled for review to make the most efficient use of UPP staff's time. The audit team moderator (ATL or designee) initiated dialogue on each standard requirement, and requested compliance evidence. This evidence and UPP's staff response was documented. UPP staff was requested to show valid evidence of meeting each applicable requirement and sub-requirement contained in the 20 standards that had been previously identified by SERC to UPP as subject to this audit. UPP staff responded by providing evidence in the form of reports, procedures, studies, and other documents. UPP 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 UPP 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 UPP did not provide sufficient evidence to support a finding of compliance, then a possible violation was identified by the team and UPP staff was informed.

Audit Overview

The audit began at 0805 on January 29, 2008 with an opening presentation by the Audit Team Lead (ATL). He reviewed the NERC compliance plan for 2008 in general, and how it applied to UPP specifically. The ATL introduced and reviewed the standards to be covered in the audit, and addressed both the expectations of UPP 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.

Audit

The audit team initially reviewed the registration status of UPP with entity staff to verify applicability of each standard. Each standard's audit began with a recitation of each requirement. UPP 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 UPP 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 5:45 p.m., on January 29, 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 8:00 a.m., on January 30, 2008. This was followed by an informal response and questions from the UPP 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 UPP staff, along with requesting that they fill out formal feedback forms for submission to NERC and SERC.

The audit team left the UPP meeting room at 9:30 a.m., on January 30, 2008.

Company Profile

Entegra Power Group, LLC was formed in June 2005, and is owned by a consortium of private equity funds and large financial investors and is governed by a board of directors. Entegra Power Group is headquartered in Tampa, Florida from where it owns and operates two power plants and one interstate gas pipeline. With the exception of the Union (El Dorado, AR) and Gila (Gila Bend, AZ) Plant employees (under the Engineering & Operations Senior Vice President), all employees are located in Tampa.

The generating resource (Union Power Station) consists of four gas-fired combined cycle units. Each unit consists of two combustion turbines with heat recovery steam generators and a single steam turbine. The facility can deliver approximately 2176 MW and is equipped with automatic voltage regulators (AVR) and power system stabilizers (PSS). Each generator output is transformed from 18 kV to 500 kV.

Audit Specifics

The compliance audit was conducted on January 29 and 30, 2008 at the UPP office 6434 Calion Highway El Dorado, AR.

Audit Team

Audit Team Role	Title	Company
Lead	Manager Planning and Engineering	SERC
Member	Senior Compliance Auditor	SERC
Member	Senior Compliance Auditor	SERC
Member	Compliance Auditor	SERC
Member	Regional Compliance Program Coordinator	NERC

UPP Audit Participants Titles and Organization

Title	UPP Organization
Plant Manager	Union Power Station
Plant Engineering Specialist	Union Power Station
Operations Manager	Union Power Station
Manager Control Area Operations	Entegra Power Group
Regulatory Compliance Administrator	Entegra Power Group
Manager Transmission	Union Power Partners
Operations Manager	Gila River Power Station

AUDIT RESULTS

The audit team found UPP to be in compliance with all of the NERC Reliability Standards in the audit scope, with the exception of a possible violation of NERC Reliability Standard CIP-001-1, Sabotage Reporting requirement 4 and NERC Standard PRC-005-1, Transmission and Generation Protection System Maintenance and Testing requirement 1 – Please see Findings Table below.

Findings

Reliability Standard	Requirement	Finding
BAL-001-0	R1.	NA
BAL-001-0	R2.	NA
BAL-001-0	R3.	NA
BAL-001-0	R4.	NA
BAL-002-0	R1.	NA
BAL-002-0	R2.	NA
BAL-002-0	R3.	NA
BAL-002-0	R4.	NA
BAL-002-0	R5.	NA
BAL-002-0	R6.	NA
BAL-003-0	R1.	NA
BAL-003-0	R2.	NA
BAL-003-0	R3.	NA
BAL-003-0	R4.	NA
BAL-003-0	R5.	NA
BAL-003-0	R6.	NA
BAL-004-0	R1.	NA
BAL-004-0	R2.	NA
BAL-004-0	R3.	NA
BAL-004-0	R4.	NA
BAL-005-0	R1.	Compliant
BAL-005-0	R2.	NA
BAL-005-0	R3.	NA
BAL-005-0	R4.	NA
BAL-005-0	R5.	NA
BAL-005-0	R6.	NA
BAL-005-0	R7.	NA
BAL-005-0	R8.	NA
BAL-005-0	R9.	NA
BAL-005-0	R10.	NA
BAL-005-0	R11.	NA
BAL-005-0	R12.	NA
BAL-005-0	R13.	NA
BAL-005-0	R14.	NA
BAL-005-0	R15.	NA
BAL-005-0	R16.	NA
BAL-005-0	R17.	NA
BAL-006-1	R1.	NA
BAL-006-1	R2.	NA
BAL-006-1	R3.	NA
BAL-006-1	R4.	NA

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

Reliability Standard	Requirement	Finding
BAL-006-1	R5.	NA
CIP-001-1	R1.	Compliant
CIP-001-1	R2.	Compliant
CIP-001-1	R3.	Compliant
CIP-001-1	R4.	Possible Violation
CIP-002-1 through CIP-009-1		Not Assessed
COM-001-1	R2.	NA
COM-001-1	R5.	NA
COM-002-2	R1.	Compliant
COM-002-2	R2.	NA
EOP-001-0	R1.	NA
EOP-001-0	R2.	NA
EOP-001-0	R3.	NA
EOP-001-0	R4.	NA
EOP-001-0	R5.	NA
EOP-001-0	R6.	NA
EOP-001-0	R7.	NA
EOP-002-2	R1.	NA
EOP-002-2	R2.	NA
EOP-002-2	R3.	NA
EOP-002-2	R4.	NA
EOP-002-2	R5.	NA
EOP-002-2	R6.	NA
EOP-002-2	R7.	NA
EOP-002-2	R8.	NA
EOP-002-2	R9.	NA
EOP-003-1	R1.	NA
EOP-003-1	R2.	NA
EOP-003-1	R3.	NA
EOP-003-1	R4.	NA
EOP-003-1	R5.	NA
EOP-003-1	R6.	NA
EOP-003-1	R7.	NA
EOP-003-1	R8.	NA
EOP-004-1	R1.	NA
EOP-004-1	R2.	NA
EOP-004-1	R3.	Compliant
EOP-004-1	R4.	NA
EOP-004-1	R5.	NA
EOP-005-1	R1.	NA
EOP-005-1	R2.	NA

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Reliability Standard	Requirement	Finding
EOP-005-1	R3.	NA
EOP-005-1	R4.	NA
EOP-005-1	R5.	NA
EOP-005-1	R6.	NA
EOP-005-1	R7.	NA
EOP-005-1	R8.	NA
EOP-005-1	R9.	NA
EOP-005-1	R10.	NA
EOP-005-1	R11.	NA
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.	NA
EOP-009-0	R1.	NA
EOP-009-0	R2.	NA
FAC-003-1	R1.	NA
FAC-003-1	R2.	NA
FAC-003-1	R3.	NA
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.	NA
FAC-013-1	R2.	NA
INT-001-2	R1.	Compliant
INT-001-2	R2.	Compliant
INT-003-2	R1.	NA
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

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Reliability Standard	Requirement	Finding
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.	NA
IRO-004-1	R4.	Compliant
IRO-004-1	R5.	NA
IRO-004-1	R6.	NA
IRO-004-1	R7.	NA
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.	NA
IRO-005-1	R9.	NA
IRO-005-1	R10.	NA
IRO-005-1	R11.	NA
IRO-005-1	R12.	NA
IRO-005-1	R13.	NA
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
IRO-006-3	R3.	NA
IRO-006-3	R4.	NA
IRO-006-3	R5.	NA
IRO-006-3	R6.	NA
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

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Reliability Standard	Requirement	Finding
PER-002-0	R1.	NA
PER-002-0	R2.	NA
PER-002-0	R3.	NA
PER-002-0	R4.	NA
PER-003-0	R1.	NA
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-004-1	R1.	NA
PRC-004-1	R2.	Compliant
PRC-004-1	R3.	Compliant
PRC-005-1	R1.	Possible Violation
PRC-005-1	R2.	Compliant
PRC-008-0	R1.	NA
PRC-008-0	R2.	NA
PRC-010-0	R1.	NA
PRC-010-0	R2.	NA
PRC-011-0	R1.	NA
PRC-011-0	R2.	NA
PRC-016-0	R1.	NA
PRC-016-0	R2.	NA
PRC-016-0	R3.	NA
PRC-017-0	R1.	NA
PRC-017-0	R2.	NA
PRC-021-1	R1.	NA
PRC-021-1	R2.	NA
TOP-002-2	R1.	NA
TOP-002-2	R2.	NA
TOP-002-2	R3.	Compliant
TOP-002-2	R4.	NA
TOP-002-2	R5.	NA
TOP-002-2	R6.	NA
TOP-002-2	R7.	NA
TOP-002-2	R8.	NA
TOP-002-2	R9.	NA
TOP-002-2	R10.	NA
TOP-002-2	R11.	NA
TOP-002-2	R12.	NA
TOP-002-2	R13.	Compliant
TOP-002-2	R14.	Compliant

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Reliability Standard	Requirement	Finding
TOP-002-2	R15.	Compliant
TOP-002-2	R16.	NA
TOP-002-2	R17.	NA
TOP-002-2	R18.	Compliant
TOP-002-2	R19.	NA
TOP-003-0	R1.	Compliant
TOP-003-0	R2.	Compliant
TOP-003-0	R3.	Compliant
TOP-003-0	R4.	NA
TOP-004-1	R6.	NA
TOP-005-1	R1.	NA
TOP-005-1	R2.	NA
TOP-005-1	R3.	NA
TOP-005-1	R4.	Compliant
TOP-007-0	R1.	NA
TOP-007-0	R2.	NA
TOP-007-0	R3.	NA
TOP-007-0	R4.	NA
TPL-001-0	R1.	NA
TPL-001-0	R2.	NA
TPL-001-0	R3.	NA
TPL-002-0	R1.	NA
TPL-002-0	R2.	NA
TPL-002-0	R3.	NA
TPL-003-0	R1.	NA
TPL-003-0	R2.	NA
TPL-003-0	R3.	NA
TPL-004-0	R1.	NA
TPL-004-0	R2.	NA
VAR-001-1	R1.	NA
VAR-001-1	R2.	NA
VAR-001-1	R3.	NA
VAR-001-1	R4.	NA
VAR-001-1	R5.	Compliant
VAR-001-1	R6.	NA
VAR-001-1	R7.	NA
VAR-001-1	R8.	NA
VAR-001-1	R9.	NA
VAR-001-1	R10.	NA
VAR-001-1	R11.	Compliant
VAR-001-1	R12.	NA
VAR-002-1	R1.	Compliant

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Reliability Standard	Requirement	Finding
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 UPP was obtained from other sources and has been documented.

SUMMARY OF UPP RESPONSE TO THE AUDIT FINDINGS

UPP understands and agrees with the Audit Results above. UPP would like to thank SERC Compliance and the members of the SERC Audit Team for the opportunity to benefit from the Audit experience, and contribute to the ultimate safety and reliability of the Bulk Electric System. The SERC Audit Team, lead by (name redacted), was very professional and informative in their duties. UPP will certainly begin implementation of the items in the "Concerns" section of the January 31, 2008 Exit Presentation. Both the PRC-005-1 and CIP-001-1 Mitigation Plans have already been submitted to serccomply and we look forward to the Final Report. Thank you again.

Determination Summary for Possible Violations Identified in an Audit

Regional Tracking Number 08-003
Entity Union Power Partners, L.P.
Audit Date 1/30/2008
Standard CIP-001-1
Requirement R4

Sufficient Basis for Violation

Factual Basis Evidence presented to the audit team by Entity to support compliance with this requirement indicated that the FBI contact was established on January 18, 2008. No evidence was presented to show that contact was established prior to 1/18/08. No evidence was provided to support Entity's self-certification on September 26, 2007 that it had established contact with the FBI. Thus, the entity cannot demonstrate that it was in compliance with this requirement for the period from June 18, 2007 to January 18, 2008.

Conclusion Violation Summary Evidence presented indicated that the Entity contacted the local FBI on January 18, 2008, but there was no documentation of any previous contact. Therefore, the entity is found in violation of R4 during the period from June 18, 2007 to January 18, 2008 for failure to establish required contact with the local FBI.

The standard indicates a Level 1 Non-Compliance for failure to establish communications contact. Compliance Enforcement Staff selected a "Severe" VSL associated with this violation of Requirement 4, consistent with the Violation Severity Level Matrix submitted by NERC to FERC on March 4, 2008, which indicates a VSL of "Severe" applicable to a failure to establish communications contacts.

NERC BOTCC Determination Taking into consideration the Commission's direction in Order No. 693, the NERC Sanction Guidelines and the Commission's July 3, 2008 Guidance Order, the NERC BOTCC reviewed the Settlement Agreement and supporting documentation on February 8, 2009. The NERC BOTCC approved the Settlement Agreement, including SERC's imposition of a financial penalty of \$10,000 against UPP, in addition to other actions to correct its documentation to promote prospective compliance required under the terms and conditions of the Settlement Agreement.

NERC Violation Number SERC200800092
NOC Number NOC-126
NOP Number NOC-126
FERC Docket Number NP10-8-000

Determination Summary for Possible Violations Identified in an Audit

Regional Tracking Number 08-004
Entity Union Power Partners, L.P.
Audit Date 1/30/2008
Standard PRC-005-1
Requirement R1

Sufficient Basis for Violation

Factual Basis The Entity did possess a Protection System Maintenance and Testing Procedure as verified during the audit. The audit team reviewed each required component and the basis for their intervals and discovered a missing component from the program. The evidence presented was deficient in the following items: Station battery testing interval and basis were not part of the procedure. The team verified that testing was done. This is a documentation issue only.

Conclusion Violation Summary The Entity is in violation of R1 because its protection system maintenance and testing program does not include all of the components as defined in the NERC glossary of terms for Protection System. Station battery testing interval and basis were not part of the procedure. While the Violation Risk Factor is High, the audit team verified that battery testing was being performed, thus this is a documentation issue only.

The standard indicates a Level of Non-Compliance of Level 1 if "Documentation of the maintenance and testing program provided was incomplete as required in R1, but records indicate maintenance and testing did occur." Compliance Enforcement Staff selected a Violation Severity Level of "Lower" for this violation because "maintenance and testing intervals and their basis was missing for no more than 25% of the applicable devices", consistent with the VSL Matrix submitted by NERC to FERC on March 4, 2008.

NERC BOTCC Determination Taking into consideration the Commission's direction in Order No. 693, the NERC Sanction Guidelines and the Commission's July 3, 2008 Guidance Order, the NERC BOTCC reviewed the Settlement Agreement and supporting documentation on February 8, 2009. The NERC BOTCC approved the Settlement Agreement, including SERC's imposition of a financial penalty of \$10,000 against UPP, in addition to other actions to correct its documentation to promote prospective compliance required under the terms and conditions of the Settlement Agreement.

NERC Violation Number SERC200800093
NOC Number NOC-126
NOP Number NOC-126
FERC Docket Number NP10-8-000