



Compliance Audit Report Public

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

**Oklahoma Gas and Electric Company
NCR01130**

**Audit
November 11-13, 2008**

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Executive Summary

This public version of the final compliance audit report will be posted on the Southwest Power Pool Regional Entity's (SPP RE) and NERC websites. Confidential information has been redacted from this report. The report will be submitted to the Oklahoma Gas and Electric Company (OGE), Oklahoma City, Oklahoma and to NERC after any Possible Alleged Violations have been processed through the Southwest Power Pool Regional Entity's (SPP RE) 2008 Compliance Monitoring and Enforcement Program.

OGE was scheduled for an on-site audit in 2008 as part of the NERC Compliance Monitoring and Enforcement Program (CMEP). The CMEP requires all Balancing Authorities (BAs) and Transmission Operators (TOPs) to be audited on-site every three years. SPP RE Audit Team arrived and reviewed 38 NERC Standards with the OGE staff. Of the 38 standards, 6 were not applicable to OGE because it does not have undervoltage load shedding, special protection systems, dynamic schedules, or disturbance monitoring equipment. The Audit Team reviewed the company evidence for each requirement in the standards with OGE subject matter experts. OGE provided evidence to support its compliance with the standards. SPP RE staff also reviewed 8 standards at the SPP RE office. These 8 standards concern information that was collected at Southwest Power Pool (SPP) or performed by SPP staff for the Region (Control Performance Standard, Disturbance Control Standard, Data submission, Transmission planning, etc.).

The mitigation plan for FAC-003-1 was reviewed during the audit. The audit team verified that OGE had completed items listed in their approved mitigation plan. SPP RE will monitor the last item in 2009 for the completion of the last item.

After reviewing all of the evidence presented, OGE was found to be compliant with 45 out of 46 of the NERC standards reviewed. OGE is found to have a Possible Alleged Violation (PAV) with NERC Standard FAC-008-1 R1 (Facility Ratings Methodology). The evidence showed that the OGE's *Facility Rating Methodology* did not have sufficient detail to verify that OGE included all the necessary parameters required by NERC Standard FAC-008-1, Requirement R1. OGE's *Facility Rating Methodology* did not state that Facility Rating shall equal the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility. The OGE staff stated the rating methodology is based on SPP Criteria but that was not included in the OGE documentation. The OGE staff stated the generation rating methodology was based on the units' capacity tests. OGE did not have a list of plants' individual components identifying the scope of the equipment addressed that showed the limits of the major components and then identifying the limiting component to set ratings. The generation methodology was not documented. OGE did have details for the transmission equipment ratings. OGE did have capacity testing results for its generation. OGE was missing the overriding documents stating how ratings for transmission and generation are created (R1).

This Possible Alleged Violation will be reported to the SPP RE Director and NERC. The possible alleged violation will be processed through the SPP RE's NERC Compliance Monitoring and Enforcement Program. OGE will receive direction from the SPP RE concerning the next step in the 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 the company's compliance with the requirements of the NERC and regional reliability standards that are applicable to the company based on the company's registered functions.
- Validate compliance with applicable reliability standards from the NERC 2008 Implementation Plan list of actively monitored standards.
- Review self-reported violations and previous self-certifications, confirm compliance with other requirements of the reliability standard, and review the status of associated mitigation plans.
- Validate coordination with neighboring BAs, TOPs, and the Reliability Coordinator.
- Document the company's compliance culture.

Scope

The compliance on-site audit includes all reliability standards applicable to the Registered Entity monitored in the NERC Implementation Plans in the current and two previous years, and may include other reliability standards applicable to the Registered Entity. Some periodically monitored standards were reviewed at the SPP RE office. The results of the off-site reviews are included in the audit report.

There are 62 NERC standards in the 2008 Monitored Compliance Program. The Audit Team reviewed 38 standards on site along with SPP RE staff reviewing 8 standards at the SPP-RE office before the audit. There were 6 standards covering functions not performed by OGE that

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

were not applicable to the company. Eight CIP standards were addressed by a NERC self certification in July.

The audit included questionnaires from the neighboring Balancing Authorities, Transmission Operators, and the Reliability Coordinator. Any indentified issues found in the neighboring and Reliability Coordinator questionnaires were addressed during the audit.

If a company has an outstanding mitigation plan or has just completed a mitigation plan, the progress or completion of the plan was validated on-site by the Audit Team. OGE did not have any outstanding mitigations plans.

This audit report includes the findings from the on-site and off-site review of the company's evidence.

Confidentiality and Conflict of Interest

Confidentiality agreements executed by the independent contractors and code of conduct documentation for the NERC representative and Regional Entity staff were provided to the SPP RE and the audited entity in advance of the audit. The work history of each Audit Team member was provided to SPP RE and the company. The company 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. OGE accepted the final Audit Team member participants with no objections. SPP RE found no conflict of interest for any of the Audit Team members.

On-site Audit

The on-site audit is part of the NERC Compliance Monitoring and Enforcement Program (CMEP). Every Transmission Operator (TOP) and Balancing Authority (BA) registered in the NERC Functional Registration Data Base is required to have an on-site audit once every three years. The on-site audit covers the 2008 NERC monitored standards, any Regional standards identified and possible other NERC standards listed in the pre-audit information. Companies on the 2008 on-site audit list were notified in the fall of 2007 about their upcoming audit and scheduled for the audit. Sixty days in advance, a letter explaining the audit was sent to the company. SPP RE sent the company a request for data and documents to complete. The pre-audit material included the Audit Team members, audit agenda, standards to be reviewed on-site, a pre-audit survey, the standards questionnaires, and the option to reject any Audit Team member. The pre-audit material received from the company provided the Audit Team an explanation of how the company operates for the functions they are registered.

The standards and supporting evidence to show compliance with the standards were reviewed with the company. The Audit Team received evidence supporting compliance with each requirement of the audited standards. Evidence included summary reports, company procedures, processes, work schedules, training schedules, on-line tools, data bases, and other sources. Information gathered from neighboring Balancing Authorities, Transmission Operators, and the Reliability Coordinator was considered during the review of evidence. The Audit Team reviewed the evidence for each standard and requirement with the company's subject matter experts. This

process enabled the team to get immediate answers to questions that arose. This process also exposed other company staff to the audit process which helped solidify why a company follows certain procedures and processes. Any self-reported violations or open mitigation plans were reviewed by the Audit Team. The Audit Team used the evidence, the discussions with the company subject matter experts along with their own professional judgment to decide on the recommended findings for the report.

On the final day, the Lead Auditor presented the findings of the audit to the company staff. OGE brought in several staff members for the presentation. The presentation covered the findings for the standards reviewed on-site and off-site. The final report process was explained along with the security of the audit information. OGE was informed that the public report will be posted on the NERC and SPP RE websites after all due processes are complete. OGE was also notified that a post-audit questionnaire will be provided for them to make any comments about the audit or Audit Team. There was a question and answer session after the presentation. The Lead Auditor answered all the questions and thanked OGE for their hospitality.

Methodology

The Audit Team reviewed the evidence supplied by the company for each requirement of all NERC standards that apply to the functions performed by the company to determine if the company complied with that requirement. The company would be found to be noncompliant with requirements where compliance cannot be confirmed.

OGE provided a conference room for the audit. The Audit Team members completed individual assignments during the audit process. OGE brought in its subject matter experts as the team worked through the standards. The subject matter experts explained the evidence and answered all questions the team asked. OGE presented most of its evidence on an overhead projection screen. OGE also provided additional hard copies of requested material for the team to review. The overhead presentation was very useful for all of the team to review the evidence at one time.

The Audit Team toured the control room and verified the information that was presented as evidence in the preceding days. The team was able to see real-time displays and ask several questions about OGE processes and procedures. The tour confirmed the information learned during the audit.

The Audit Team met privately after being presented the evidence from the company. The team reviewed each requirement and discussed the levels of compliance and addressed each team member's notes from the audit. The Audit Team decided on the findings to present to the company and the SPP RE. The Audit Team developed the closing presentation of audit findings. The Lead Auditor gave the presentation to the OGE staff and answered all their questions.

Audit Overview

The Audit Team met with the OGE representative on the first morning of the audit. The audit process was discussed to verify if any changes to the agenda were warranted. There were no changes identified by either party.

Audit

The OGE audit was performed as planned. The agenda was followed with only minor staff adjustments.

Exit Briefing

The Audit Team gave an exit presentation for the OGE staff. The Lead Auditor explained the findings from the audit. The presentation was attended by OGE staff that participated in the audit and other staff. The presentation was open for comments and discussion about the findings. The exit presentation also covered any possible violations and mitigation requirements. OGE was informed that it will receive an audit evaluation to complete and return to NERC.

The Audit Team used the exit presentation to help verify that the information presented is correct.

Company Profile

OGE performs the following NERC functions and is registered with NERC/SPP RE for these functions:

- Balancing Authority
- Transmission Operator
- Transmission Owner
- Transmission Planner
- Transmission Service Provider
- Generation Operator
- Generation Owner
- Resource Planner
- Load Serving Entity
- Distribution Provider
- Purchasing Selling Entity

OGE is headquartered in Oklahoma City, Oklahoma. OGE is an investor-owned utility providing services to approximately 765,000 retail customers in Oklahoma and western Arkansas along with a number of wholesale customers throughout its service area.

OGE has 1458 miles of 69 kV, 1784 miles of 138 kV, 192 miles of 161 kV, 791 miles of 345 kV and 47 miles of 500 kV transmission lines. OGE owns an autotransformer at 138 kV, but no associated transmission lines. OGE has eight 345 kV, six 138 kV and two 69 kV interconnections with American Electric Power Service; one 138 kV interconnection with Associated Electric Cooperative; one 500 kV interconnection with Entergy; one 161 kV, one 138 kV and one 69 kV interconnections with Great Rivers Dam Authority; four 161 kV interconnection with Southwestern Power Administration; ten 138 kV and four 69 kV interconnections with Western Farmers Electric Cooperative, and one 345 kV and one 138 kV interconnections with Western Resources.

The Company's all-time electric summer peak load was 6473 MW on August 10, 2006. OGE normally peaks in summer. All OGE generation is in its balancing area and it has no jointly owned generators. It does not have any IPPs in its balancing area. OGE owns 2800 MW of coal fired, 3999 MW of gas fired, and additional wind capacity.

SPP is the Reliability Coordinator for OGE. OGE participates in the SPP reserve sharing group. OGE uses SPP as the transmission provider for its transmission system but is the transmission provider for several grandfathered transmission reservations.

OGE directly performs the other functions for which it is responsible.

Audit Specifics

The compliance audit was conducted on November 11 - 13, 2008 at the OGE office in Oklahoma City, Oklahoma.

Audit Team

Audit Team Role	Title	Company
Lead	Lead Engineer, Compliance	SPP RE
Member	Lead Compliance Specialist	SPP RE
Member	Lead Compliance Engineer	SPP RE
Member	SPP RE Contractor	SPP RE
Member	SPP RE Contractor	SPP RE

OGE Audit Participants

Title	Organization
Assistant Corporate Secretary and Compliance Officer	OGE
Transmission Tariff Coordinator	OGE
Lead Transmission Operations Engineer	OGE
Senior Power Coordinator	OGE
Senior Lead Engineer Electrical	OGE
Senior SP&C Engineer	OGE
Protection and Control Coordinator	OGE
Project Manager	OGE
Manager Asset Management	OGE
Internal Auditor	OGE
Vice President Power Delivery	OGE
Vice President Power Supply	OGE
Director System Expansion and Transmission Operations	OGE
Manager - Power Operations	OGE
Supervisor SCADA and EMS	OGE
Lead Process Engineer	OGE
Supervisor FTS	OGE
PSS Manager	OGE
Manager Transmission Planning	OGE
Compliance Coordinator	OGE
Lead Transmission Operations Engineer	OGE
Leader System Integrity	OGE
Supervisor Transmission Operations	OGE
Director Region Operations	OGE

Audit Results

OGE had one mitigation plan open for FAC-003-1. The items in the mitigation plan were reviewed and OGE had completed all but one item. This item is to be completed in 2009 and the SPP RE will follow this until it is completed. After reviewing all of the evidence presented to the Audit Team, OGE was found to be compliant with 45 out of 46 of the NERC standards reviewed. OGE is found to have a Possible Alleged Violation (PAV) with NERC Standard FAC-008-1 R1 (Facility Ratings Methodology).

The evidence showed that the OGE *Facility Rating Methodology* did not have sufficient detail to verify that OGE included all the necessary parameters required by NERC Standard FAC-008-1, Requirement R1. It did not state that Facility Rating shall equal the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility. The OGE staff stated the rating methodology is based on SPP Criteria but that was not included in the OGE documentation. The OGE staff stated the generation rating methodology was based on the units' capacity tests. OGE did not have a list of plants' individual components identifying the scope of the equipment addressed that showed the limits of the major components and then identifying the limiting component to set ratings. The generation methodology was not documented. OGE did have details for the transmission equipment ratings. OGE did have capacity testing results for its generation. OGE is missing the overriding documents stating how ratings for transmission and generation are created (R1).

Senior management attended the opening and the closing presentations. OGE was prepared for the audit and presented its documentation in a complete and concise manner. OGE expert personnel and Compliance Manager presented the material supporting its compliance to the standard requirements. OGE showed that it is in compliance with the NERC standards and is working to improve its processes and procedures to insure that it continues to remain compliant. OGE staff is committed to compliance.

Findings

OGE On-site Audit Findings

*N/A – Not Applicable

PAV – Possible Alleged Violation

Reliability Standard	Requirement	Finding
BAL-001-0	R1.	Compliant
BAL-001-0	R2.	Compliant
BAL-001-0	R3.	Compliant
BAL-001-0	R4.	Compliant
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.	Compliant
BAL-003-0	R5.	Compliant
BAL-003-0	R6.	Compliant
BAL-004-0	R3.	Compliant
BAL-004-0	R4.	Compliant
BAL-005-0	R1.	Compliant
BAL-005-0	R2.	Compliant
BAL-005-0	R3.	N/A
BAL-005-0	R4.	N/A
BAL-005-0	R5.	N/A
BAL-005-0	R6.	Compliant
BAL-005-0	R7.	Compliant
BAL-005-0	R8.	Compliant
BAL-005-0	R9.	Compliant
BAL-005-0	R10.	N/A
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

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Reliability Standard	Requirement	Finding
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
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-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	R9.	Compliant
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	R2.	Compliant
EOP-004-1	R3.	Compliant

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Reliability Standard	Requirement	Finding
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-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-008-1	R1.	PAV
FAC-008-1	R2.	Compliant
FAC-008-1	R3.	Compliant
FAC-009-1	R1.	Compliant
FAC-009-1	R2.	Compliant
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	R8.	Compliant
IRO-004-1	R4.	Compliant
IRO-004-1	R7.	Compliant
IRO-005-1	R8.	Compliant
IRO-005-1	R13.	Compliant
IRO-005-1	R14.	Compliant
IRO-006-3	R6.	Compliant
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
PRC-004-1	R1.	Compliant
PRC-004-1	R2.	Compliant

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Reliability Standard	Requirement	Finding
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.	N/A
PRC-010-0	R2.	N/A
PRC-011-0	R1.	N/A
PRC-011-0	R2.	N/A
PRC-016-0	R1.	N/A
PRC-016-0	R2.	N/A
PRC-016-0	R3.	N/A
PRC-017-0	R1.	N/A
PRC-017-0	R2.	N/A
PRC-021-1	R1.	N/A
PRC-021-1	R2.	N/A
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-004-1	R1.	Compliant
TOP-004-1	R2.	Compliant
TOP-004-1	R3.	Compliant

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Reliability Standard	Requirement	Finding
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.	Compliant
TOP-007-0	R1.	Compliant
TOP-007-0	R2.	Compliant
TOP-007-0	R3.	Compliant
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

OGE completed the SPP RE Compliance Program Questionnaire prior to the compliance audit. OGE stated that it is in the process of implementing a companywide compliance monitoring program.

The Board of Directors for OGE appointed John D. Rhea to the position of Assistant Corporate Secretary and Compliance Officer in 2007, and his first priority is to assist in NERC Reliability Standards compliance. He has implemented the Compliance Monitoring Program and uses the Compliance Management Tool to facilitate compliance.

The Compliance Management Tool is used to track the documentation that supports OGE's compliance to the NERC and regional standards. This tool is maintained by the Compliance Officer and his staff and has been distributed to all applicable personnel including those individuals directly responsible for compliance with NERC's reliability standards.

The Assistant Corporate Secretary and Compliance Officer reports to the Corporate Secretary for OGE. The Corporate Secretary then reports to the COB, CEO, and President of the OGE. All three regularly attend the Board of Directors meetings and have access to the Board. All offices are located on the same floor giving the Compliance Officer access to the CEO.

The OGE Reliability Compliance Department coordinates the development, maintenance, and compliance with internal policies and procedures to meet NERC and SPP requirements. OGE Reliability Compliance Department participates and monitors compliance activities at the national and regional levels.

The Internal Audit Department is scheduled to complete an audit of the Compliance Department on an annual basis. Every individual with responsibilities for meeting compliance obligations is trained at least annually in the Compliance Monitoring Program and the Compliance Management Tool. Additional training is provided on an as needed basis.

OGE has participated in the SPP regional compliance program since 2000 and has always had someone participating in the regional workshops, survey activities, self certification process, and spot checks. The Manager-Reliability Compliance distributes compliance information to the departments responsible for compliance.

Overall, OGE has a compliance program with staff involvement. The staff is aware of the importance of continual compliance. OGE is refining a process to track and keep documentation up to date and showed progress to make its compliance program stronger in the future.