

Trent Wind Farm LP

NERC ID: NCR04148

Audit Report

for Compliance with

NERC Reliability Standards

Public Version

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

Audit Date:	August 6, 2008
Audit Location:	Texas Regional Entity
Report Date:	September 15, 2008
Prepared By:	Brent J. Torgrimson

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1.0 EXECUTIVE SUMMARY

The Table Top compliance audit of Trent Wind Farm LP (Trent) was conducted on August 6, 2008. The NERC Reliability Standards that are being actively monitored for 2008 were reviewed based on Trent's registration as a Generator Owner (GO). The audit team consisted of three (3) representatives from Texas Regional Entity (Texas RE). Based on the review of documentation provided by Trent, Trent met all of the North American Electric Reliability Corporation (NERC) Standard requirements.

2.0 AUDIT PROCESS

The compliance audit process is detailed in the NERC Compliance Monitoring and Enforcement Program (CMEP), available at www.nerc.com. The NERC CMEP generally conforms to the United States Government Accountability Office Government Auditing Standards and other generally accepted audit practices.

2.1 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 Trent's compliance with the requirements of the reliability standards that are applicable to Trent based on Trent's registered functions
- Validate compliance with applicable reliability standards from the NERC 2008 CMEP Implementation Plan list of actively monitored standards
- Validate evidence of any self-reported violations and previous self-certifications, confirm compliance with other requirements of the reliability standards, and review the status of any associated mitigation plans
- Document Trent's compliance culture

2.2 Scope

The scope of this compliance audit is inclusive of all requirements of the NERC Reliability Standards that are being actively monitored in 2008 and any others that may be identified by the audit team at the time of the audit applicable to GOs. The audit was performed by three (3) members of Texas RE.

For the 2008 CMEP, the monitoring period for the compliance audit will 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.

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

2.2.1 Confidentiality and Conflict of Interest

Confidentiality agreements and code of conduct documentation for the regional entity staff were provided to Trent prior to the audit. Work history and conflict of interest forms submitted by each audit team member were provided to Trent. Trent 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. Trent accepted the audit team member participants with no objections.

2.3 Methodology

Once an audit date was set by Texas RE, Trent was sent a pre-audit questionnaire and the Reliability Standard Auditors Work Sheets (RSAWS) for the list of actively monitored NERC Standards. Texas RE reviewed the responses to the RSAWS, pre-audit questions and supporting documentation.

The audit team conducted an exit briefing conference call with Trent. The audit team verbally shared its preliminary results with Trent's management.

2.4 Company Profile

The Trent Wind Farm, also known as the Trent Mesa Wind Project, is a 150-megawatt (150,000-kilowatt) wind power plant located between Abilene and Sweetwater in West Texas. Trent Wind Farm was constructed during 2001 and the Commercial Operation Date (COD) was 11/19/01. The project uses 100 turbines each rated at 1.5 megawatts (1,500 kilowatts). American Electric Power developed, built portions of the project and owns the Trent Wind Farm. GE Wind Energy, manufacturer of the 1.5-megawatt wind turbines, provides certain operations and maintenance functions. Luminant Energy purchases the electricity produced at the power plant under a long-term agreement.

This information and more details can be found at the following web site <http://www.trentmesa.com/>

2.5 Audit Specifics

Audit Date: August 6, 2008
Audit Location: Texas Regional Entity

Audit Team:

Name	Company/Title
Brent Torgrimson	Texas RE/Audit Team Leader
Jeff Whitmer	Texas RE/Auditor
J. Frank Vick	Texas RE/Auditor
Jule Tate	NERC/Auditor

Trent Wind Farm LP Conference Call Participants:

Name	Company/Title
Ben Givens	Wind Farm Operations Manager
Daniel Makelki	Manager-Regional Engineering Services
Dawn Del Bianco	Manager-Asset Optimization
Duane Phlegar	Manager-Regional Engineering Services
Joseph Emberger	Manager-Joint Venture Ops & Support
Roy Blackshear	Wind Farm Operations Manager
Terry Fuller	Senior Engineer
Thad Ness	Reliability Standards Compliance Manager
Raj Rana	Director RTO Policy & NERC Compliance

3.0 AUDIT RESULTS

3.1 Findings

The Compliance Audit Team found that Trent was compliant with all 2008 actively monitored NERC Standards at the time of the audit.

The following table is a summary of the auditor's notes for those NERC standards reviewed during the audit:

Reliability Standard	Requirement	Finding
CIP-002-1 through CIP-009-1		Reviewed
EOP-009-0	R1.	NA
EOP-009-0	R2.	Compliant
FAC-008-1	R1.	Compliant
FAC-008-1	R2.	Compliant
FAC-008-1	R3.	Compliant
FAC-009-1	R1.	Compliant
FAC-009-1	R2.	Compliant
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
PRC-004-1	R1.	NA
PRC-004-1	R2.	Compliant
PRC-004-1	R3.	Compliant
PRC-005-1	R1.	Compliant

Reliability Standard	Requirement	Finding
PRC-005-1	R2.	Compliant
PRC-016-0	R1.	Compliant
PRC-016-0	R2.	Compliant
PRC-016-0	R3.	Compliant
PRC-017-0	R1.	Compliant
PRC-017-0	R2.	Compliant
VAR-002-1	R1.	NA
VAR-002-1	R2.	NA
VAR-002-1	R3.	NA
VAR-002-1	R4.	Compliant
VAR-002-1	R5.	Compliant

3.2 Conclusion

Trent was found in compliance with the standards that were audited.

3.3. Compliance Culture

The compliance culture was not reviewed by the audit team.