



Compliance Audit Report Public Version

**Elk Hills Power - EHP
NCR05143
June 24, 2008**

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

Final – December 15, 2008

Audit Overview

The WECC Compliance Department conducted an off-site compliance audit of the Elk Hills Power (EHP) on June 24, 2008. The off-site audit was conducted at the WECC Compliance Department offices at 615 Arapeen Drive, Suite 210, Salt Lake City, Utah.

EHP personnel traveled to Salt Lake City for the off-site audit. They were notified at the start of the off-site audit, were kept informed as the audit progressed and were present at the closing presentation. The audit team requested additional information during the audit from the personnel.

At the time of the off-site audit, EHP was registered for the following functions: Generator Owner (GO) and Generator Operator (GOP).

The following functions were audited: Generator Owner (GO) and Generator Operator (GOP).

EHP does not have an Internal Compliance Program (ICP) as declared on the off-site audit survey.

This off-site compliance audit report includes information regarding possible compliance violations. This information will be used to help determine the severity level of sanctions and penalties. The possible violations, along with the off-site compliance audit report, will be provided to the WECC Compliance Department for processing through the WECC Compliance Monitoring and Enforcement Program (CMEP). If the WECC Compliance Department confirms the findings of the audit team, possible violations become alleged violations, and EHP and NERC will be notified via an Alleged Violation Letter.

The audit team used the Reliability Standard Audit Worksheets (RSAWs) during the compliance review of each reliability standard. The evidence provided was reviewed for the period June 18, 2007 through the off-site audit date June 24, 2008. The June 18, 2007 date is when FERC made compliance to eighty-three (83) of the NERC Reliability Standards mandatory and enforceable in the United States.

http://www.nerc.com/filez/enforcement/FinalFiled_NOP_NOC-427.pdf

Confidentiality and Conflict of Interest

Confidentiality agreements, executed by the WECC independent contractors (consultants) and code of conduct documentation for the NERC representative and WECC compliance staff, were provided to EHP in advance of the off-site audit, if requested. Work history and conflict of interest forms submitted by each

audit team member were also provided. EHP 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. EHP accepted the audit team member participants with no objections.

Off-site Audit

Off-site audits of Generation Operator (GOP) and Generator Owner (GO) are conducted on a six-year cycle. If a Registered Entity is registered for other functions (such as LSE, PSE, DP, etc.), it had the option of having these other functions audited during the off-site audit.

EHP was officially notified of the off-site audits with a 60-day Notice of Compliance Audit letter. Accompanying this notification are attachments relating to the audit as listed below:

- Pre-audit introduction letter
- Audit team bios
- Pre-audit questionnaire
- Audit documentation matrix
- WECC 2008 Auditing, Monitoring and Reporting Requirements for NERC Standards

EHP was notified in the Pre-Audit letter that personnel (subject matter experts representing all the registered functions) would need to be available to answer questions (interviews) the audit team might have regarding the documentation.

EHP was also informed that the off-site compliance audit would be conducted consistent with the following WECC Regional and NERC documents:

- WECC Compliance Monitoring and Enforcement Program
- NERC Reliability Standard Audit Worksheets

EHP was asked to submit the completed questionnaire, the audit documentation matrix and other requested documents back to the WECC Compliance Department.

A pre-audit conference call was held by WECC compliance staff with all the Registered Entities scheduled for an off-site audit.

Professional judgment was used by the audit team during the off-site audit. The audit team leader may have requested interviews with employees representing subject matter expertise regarding the registered functions being audited. These interviews in conjunction with the evidence, gave the audit team a factual basis for determining compliance with the NERC reliability standards.

Reference - Generally accepted government auditing standard 3.31 - Auditors must use professional judgment in planning and performing audits and attestation engagements and in reporting the results.

Reference - Generally accepted government auditing standard 3.39 - While this standard places responsibility on each auditor and audit organization to exercise professional judgment in planning and performing an audit or attestation engagement, it does not imply unlimited responsibility, nor does it imply infallibility on the part of either the individual auditor or the audit organization. Absolute assurance is not attainable because of the nature of evidence and the characteristics of fraud. Professional judgment does not mean eliminating all possible limitations or weaknesses associated with a specific audit, but rather identifying, considering, minimizing, mitigating, and explaining them.

Methodology

Methodology: the auditing of reliability standards and best practices to be followed by compliance auditors in carrying out their work. The methodology is objective, measurable, complete and relevant to the audit objectives. The auditors identify potential sources of audit evidence and consider the amount and type of evidence needed given the risk and significance when defining the audit methodology.

Audit Specifics

Audit Team

Audit Team Role	Title	Company
Lead	Senior Compliance Engineer	WECC
Member	Compliance Consultant	WECC
Observer	Regional Compliance Program Coordinator	NERC

Registered Entity Audit Participants (Attending/Interviewed/Listening)

Title	Audited Organization
Plant Manager	Elk Hills Power
Operations and Maintenance Manager	Elk Hills Power
Sonnie Pineda	Plant Engineer
Operations and Maintenance Manager	Sempra Generation
Vice President Asset Management	Sempra Generation
Director of Federal Regulatory Affairs	Sempra Global

Title	Audited Organization
Regulatory and Compliance Specialist	Sempra Global
Senior Counsel	Sempra Energy

Findings

The preliminary findings of the audit team at the off-site audit were presented to EHP at the closing presentation. These findings are indicated in Table A below. The “Finding” column contains one of the following: Compliant, Possible Violation (PV), New Possible Violation (NPV), Not Applicable (NA), Not Audited, Outstanding Alleged Violation (OV), Retraction requested (Retract), Self-reported Violation (Self-Report), or other appropriate description.

Table A

Reliability Standard	Requirement	Finding
BAL-005-0	R1.	Compliant
BAL-005-0	R2.	Not Applicable
BAL-005-0	R3.	Not Applicable
BAL-005-0	R4.	Not Applicable
BAL-005-0	R5.	Not Applicable
BAL-005-0	R6.	Not Applicable
BAL-005-0	R7.	Not Applicable
BAL-005-0	R8.	Not Applicable
BAL-005-0	R9.	Not Applicable
BAL-005-0	R10.	Not Applicable
BAL-005-0	R11.	Not Applicable
BAL-005-0	R12.	Not Applicable
BAL-005-0	R13.	Not Applicable
BAL-005-0	R14.	Not Applicable
BAL-005-0	R15.	Not Applicable
BAL-005-0	R16.	Not Applicable
BAL-005-0	R17.	Not Applicable
CIP-001-1	R1.	Compliant
CIP-001-1	R2.	Compliant
CIP-001-1	R3.	Compliant
CIP-001-1	R4.	Compliant
COM-002-2	R1.	Compliant
COM-002-2	R2.	Not Applicable
EOP-004-1	R1.	Not Applicable
EOP-004-1	R2.	Compliant
EOP-004-1	R3.	Compliant

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Reliability Standard	Requirement	Finding
EOP-004-1	R4.	Not Applicable
EOP-004-1	R5.	Not Applicable
EOP-009-0	R1.	Not Applicable
EOP-009-0	R2.	Not Applicable
FAC-008-1	R1.	NPV
FAC-008-1	R2.	Compliant
FAC-008-1	R3.	Compliant
FAC-009-1	R1.	Compliant
FAC-009-1	R2.	Compliant
IRO-001-1	R1.	Not Applicable
IRO-001-1	R2.	Not Applicable
IRO-001-1	R3.	Compliant
IRO-001-1	R4.	Not Applicable
IRO-001-1	R5.	Not Applicable
IRO-001-1	R6.	Not Applicable
IRO-001-1	R7.	Not Applicable
IRO-001-1	R8.	Compliant
IRO-001-1	R9.	Not Applicable
IRO-004-1	R1.	Not Applicable
IRO-004-1	R2.	Not Applicable
IRO-004-1	R3.	Not Applicable
IRO-004-1	R4.	Compliant
IRO-004-1	R5.	Not Applicable
IRO-004-1	R6.	Not Applicable
IRO-004-1	R7.	Not Applicable
IRO-005-1	R1.	Not Applicable
IRO-005-1	R2.	Not Applicable
IRO-005-1	R3.	Not Applicable
IRO-005-1	R4.	Not Applicable
IRO-005-1	R5.	Not Applicable
IRO-005-1	R6.	Not Applicable
IRO-005-1	R7.	Not Applicable
IRO-005-1	R8.	Not Applicable
IRO-005-1	R9.	Compliant
IRO-005-1	R10.	Not Applicable
IRO-005-1	R11.	Not Applicable
IRO-005-1	R12.	Not Applicable
IRO-005-1	R13.	Compliant
IRO-005-1	R14.	Not Applicable
IRO-005-1	R15.	Not Applicable
IRO-005-1	R16.	Not Applicable

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Reliability Standard	Requirement	Finding
IRO-005-1	R17.	Compliant
MOD-010-1	R1.	Compliant
MOD-010-1	R2.	Compliant
MOD-012-0	R1.	Compliant
MOD-012-0	R2.	Compliant
PRC-004-1	R1.	Not Applicable
PRC-004-1	R2.	Compliant
PRC-004-1	R3.	Compliant
PRC-005-1	R1.	NPV
PRC-005-1	R2.	NPV
PRC-016-0	R1.	Not Applicable
PRC-016-0	R2.	Not Applicable
PRC-016-0	R3.	Not Applicable
PRC-017-0	R1.	Not Applicable
PRC-017-0	R2.	Not Applicable
TOP-001-1	R1.	Not Applicable
TOP-001-1	R2.	Not Applicable
TOP-001-1	R3.	Compliant
TOP-001-1	R4.	Not Applicable
TOP-001-1	R5.	Not Applicable
TOP-001-1	R6.	Compliant
TOP-001-1	R7.	Compliant
TOP-001-1	R8.	Not Applicable
TOP-002-2	R1.	Not Applicable
TOP-002-2	R2.	Not Applicable
TOP-002-2	R3.	Compliant
TOP-002-2	R4.	Not Applicable
TOP-002-2	R5.	Not Applicable
TOP-002-2	R6.	Not Applicable
TOP-002-2	R7.	Not Applicable
TOP-002-2	R8.	Not Applicable
TOP-002-2	R9.	Not Applicable
TOP-002-2	R10.	Not Applicable
TOP-002-2	R11.	Not Applicable
TOP-002-2	R12.	Not Applicable
TOP-002-2	R13.	Compliant
TOP-002-2	R14.	Compliant
TOP-002-2	R15.	Compliant
TOP-002-2	R16.	Not Applicable
TOP-002-2	R17.	Not Applicable
TOP-002-2	R18.	Compliant

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Reliability Standard	Requirement	Finding
TOP-002-2	R19.	Not Applicable
TOP-003-0	R1.	Compliant
TOP-003-0	R2.	Compliant
TOP-003-0	R3.	Compliant
TOP-003-0	R4.	Not Applicable
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
VAR-STD-002a-1	WR1.	Compliant
VAR-STD-002b-1	WR1.	Compliant