



# **Compliance Audit Report Public Version**

**GWFE Energy LLC (GWFE)  
NCR05174  
March 27, 2009**

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

**April 10, 2009**

## Audit Overview

The WECC Compliance Department conducted an off-site compliance audit of the GWF Energy LLC (GWFE) on March 27, 2009. The off-site audit was conducted at the WECC Compliance Department offices at 615 Arapeen Drive, Suite 210, Salt Lake City, Utah.

GWFE personnel were notified at the start of the off-site audit and kept informed as the audit progressed. GWFE had personnel available at the WECC Offices during the audit and at the closing presentation.

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

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

GWFE has an Internal Compliance Program.

The audit team used the Reliability Standard Audit Worksheets (RSAWs) during the compliance review of each reliability standard.

No violations were identified by the audit team during this audit.

### ***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 available to GWFE 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. GWFE 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 that audit team member's impartial performance of duties. GWFE accepted the audit team member participants with no objections.

### ***Off-site Audit***

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

- Notice of Off-site Audit
- Compliance Monitoring Authority Letter
- Audit team bios

- Pre-audit Survey
- Certification sheet
- 2009 RSAWs

GWFE 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.

GWFE 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 2009 Reliability Standard Audit Worksheets (RSAWs)

GWFE was asked to submit the completed Pre-Audit Survey, 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 followed by compliance auditors in carrying out their work. The methodology is objective, measurable, complete and relevant to the audit objectives. The auditor identifies potential sources of audit evidence and considers the amount and type of

evidence needed given the risk and significance when defining the audit methodology.

*Audit Specifics*

**Audit Team**

| <b>Audit Team Role</b> | <b>Title</b>            | <b>Company</b> |
|------------------------|-------------------------|----------------|
| Lead                   | Sr. Compliance Engineer | WECC           |
| Member                 | Compliance Consultant   | WECC           |

**Registered Entity Audit Participants (Attending/Interviewed/Listening)**

| <b>Title</b>                         | <b>Audited Organization</b> |
|--------------------------------------|-----------------------------|
| Operations Supervisor                | GWFE                        |
| Vice President                       | GWFE                        |
| Instrument and Electrical Supervisor | GWFE                        |

**Findings**

The findings of the audit team at the off-site audit were presented to GWFE 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 (N/A), Not Audited, Outstanding Alleged Violation (OV), Retraction requested (Retract), Self-reported Violation (Self-Report), or other appropriate description.

**Table A**

| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| CIP-001-1                   | R1.                | Compliant      |
|                             | R2.                | Compliant      |
|                             | R3.                | Compliant      |
|                             | R4.                | Compliant      |
| COM-002-2                   | R1.                | Compliant      |
|                             | R2.                | Not Audited    |
| FAC-008-1                   | R1.                | Compliant      |
|                             | R2.                | Compliant      |
|                             | R3.                | Compliant      |
| FAC-009-1                   | R1.                | Compliant      |
|                             | R2.                | Compliant      |
| IRO-001-1                   | R1.                | Not Audited    |
|                             | R2.                | N/A            |
|                             | R3.                | N/A            |

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| Reliability Standard | Requirement | Finding     |
|----------------------|-------------|-------------|
|                      | R4.         | Not Audited |
|                      | R5.         | Not Audited |
|                      | R6.         | Not Audited |
|                      | R7.         | N/A         |
|                      | R8.         | Compliant   |
|                      | R9.         | N/A         |
| IRO-004-1            | R1.         | N/A         |
|                      | R2.         | N/A         |
|                      | R3.         | N/A         |
|                      | R4.         | Compliant   |
|                      | R5.         | N/A         |
|                      | R6.         | N/A         |
|                      | R7.         | N/A         |
| IRO-005-1            | R1.         | N/A         |
|                      | R2.         | N/A         |
|                      | R3.         | N/A         |
|                      | R4.         | N/A         |
|                      | R5.         | N/A         |
|                      | R6.         | N/A         |
|                      | R7.         | N/A         |
|                      | R8.         | N/A         |
|                      | R9.         | N/A         |
|                      | R10.        | N/A         |
|                      | R11.        | N/A         |
|                      | R12.        | N/A         |
|                      | R13.        | Compliant   |
|                      | R14.        | Not Audited |
|                      | R15.        | N/A         |
|                      | R16.        | N/A         |
|                      | R17.        | N/A         |
| PRC-001-1            | R1.         | Compliant   |
|                      | R2.         | Compliant   |
|                      | R3.         | Not Audited |
|                      | R4.         | N/A         |
|                      | R5.         | Compliant   |
|                      | R6.         | N/A         |
| PRC-004-1            | R1.         | N/A         |
|                      | R2.         | Compliant   |
|                      | R3.         | Compliant   |
| PRC-005-1            | R1.         | Compliant   |
|                      | R2.         | Compliant   |

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| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| PRC-017-0                   | R1.                | N/A            |
|                             | R2.                | Not Audited    |
| TOP-001-1                   | R1.                | N/A            |
|                             | R2.                | N/A            |
|                             | R3.                | Compliant      |
|                             | R4.                | N/A            |
|                             | R5.                | N/A            |
|                             | R6.                | Compliant      |
|                             | R7.                | Compliant      |
|                             | R8.                | N/A            |
| TOP-002-2                   | R1.                | N/A            |
|                             | R2.                | Not Audited    |
|                             | R3.                | Compliant      |
|                             | R4.                | N/A            |
|                             | R5.                | Not Audited    |
|                             | R6.                | Not Audited    |
|                             | R7.                | Not Audited    |
|                             | R8.                | Not Audited    |
|                             | R9.                | N/A            |
|                             | R10.               | Compliant      |
|                             | R11.               | N/A            |
|                             | R12.               | Not Audited    |
|                             | R13.               | Compliant      |
|                             | R14.               | Compliant      |
|                             | R15.               | Compliant      |
|                             | R16.               | N/A            |
|                             | R17.               | N/A            |
|                             | R18.               | Compliant      |
|                             | R19.               | N/A            |
| VAR-STD-002a-1              | WR1.               | Compliant      |
| VAR-STD-002b-1              | WR1.               | Compliant      |