



NORTHEAST POWER COORDINATING COUNCIL, INC.
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Compliance Audit Report Public Version

ISO New England Inc.

April 20 to April 24, 2009

May 7, 2009

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

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Executive Summary

The on-site compliance audit of ISO New England Inc. (ISO-NE), NERC ID #NCR07124 was conducted between April 20 and April 24, 2009. At the time of the audit, ISO-NE was registered for the BA, IA, PA, RC, RP, TOP, TP and TSP functions. The audit was completed using data submitted by ISO-NE prior to the start of the on-site audit and data provided while on-site as a result of questions that arose during the on-site portion of the audit.

The auditor evaluated ISO-NE's compliance with 41 reliability standards and 324 requirements/sub-requirements in the 2009 NERC Compliance Monitoring and Enforcement Program (CMEP). The audit reviewed reliability standards identified in the NERC 2009 Implementation Plan for the period of the last twelve months or monitoring timeframes specified in each reliability standard. An additional 51 requirements and sub-requirements were also evaluated for compliance during the audit to insure compliance in areas beyond the monitored list.

CIP standards 2, 3, 4, 7, 8 and 9 were audited. Although CIP 2 to 9 audits were not scheduled to begin until July 1, 2009, ISO-NE volunteered to be audited during the scheduled on-site audit. Evidence used to determine compliance with the CIP standards was judged to be sensitive; as a result, no evidence was removed from the ISO-NE site. A custody letter was put in place and copies of all evidence were placed in a sealed envelope in the possession of the Cyber Security Manager. The custody agreement allows NPCC access to the data at ISO-NE offices, if required, at a future date.

Oversight of the audit was provided by 4 FERC and 1 NERC staff members.

Of the 41 standards and 375 requirements and sub-requirements audited for the functions ISO-NE is registered, all standards and all but 8 requirements and sub-requirements were judged to be compliant; those 8 were judged to be not applicable.

ISO-NE staff provided overviews of each standard resulting in a more clear understanding of their business model and accelerated the audit process. The evidence provided to demonstrate compliance was well presented and well organized. The audit team would like to thank the ISO-NE staff for their support offered throughout the audit.

There were no ongoing or recently completed mitigation plans and, therefore, none were reviewed by the audit team.

This audit report depicts all activities performed by the audit team during the audit. Some information discussed during the course of the audit is non-public. Any non-public information included in this report is listed in the Findings section, specifically in the Auditors Notes Summary in the table. This portion of the table will be redacted from the public posting version of this report.

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 to:

- Independently review ISO New England Inc.'s compliance with the requirements of the reliability standards that are applicable to ISO-NE based on the ISO-NE's registered functions.
- Validate compliance with applicable reliability standards from the NERC 2009 Implementation Plan list of actively monitored standards and additional NERC reliability standards selected by NERC.
- Validate compliance with applicable Regional Standards from the NPCC 2009 Implementation Plan list of actively monitored standards.
- Validate evidence of self-reported violations and previous self-certifications and confirm compliance with other requirements of the reliability standard.
- Review the status of associated mitigation plans.
- Observe and document the ISO New England Inc.'s compliance program and culture.

Scope

The audit included all standards identified in the February 9, 2009 audit letter. The audit was a regularly scheduled audit and no self-reported violations or compliance investigations were involved in the audit.

At the time of the audit, ISO-NE was registered for the functions BA, IA, PA, RC, RP, TOP, TP and TSP. The audit team evaluated ISO-NE for compliance during the period of June 18, 2007 to April 24, 2009.

Confidentiality and Conflict of Interest

Confidentiality and Conflict of Interest of the audit team are governed under the Delegation Agreement with NERC and Section 1500 of the NERC Rules of Procedure. The audited entity was informed in advance of the audit that the independent contractors executed confidentiality agreements and code of conduct documentation was in place for the

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

NERC representative and regional entity staff. Work history and conflict of interest forms submitted by each audit team member are on file in the NPCC corporate offices. The audited entity 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. The audited entity accepted the audit team member participants with no objections.

On-site Audit

ISO-NE was provided with a pre-audit request letter identifying the standards and requirements subject to audit. The audit letter was sent to ISO-NE more than 60 days in advance of the scheduled audit. This was an on-site audit conducted every three years or as determined to be necessary by the region. ISO-NE had not self reported any violations.

In all cases, the auditors requested interviews with ISO-NE employees representing subject matter expertise regarding all of the registered functions of ISO-NE. These interviews resulted in data requests that in conjunction with the submitted evidence would provide the auditor with a basis for professional judgment when validating compliance with reliability standards.

Methodology

The auditors prepared reliability standard audit worksheets (RSAWs) to evaluate each standard. The RSAWs are used to ensure consistency and to document evidence of compliance or non-compliance with the standards. All relevant documents are considered and to the extent they form a portion of the audit trail are referenced in the RSAWs.

Audit Overview

The audit overview was provided to ISO-NE through several conference calls and at the on-site kickoff meeting on April 20, 2009. Each audit team member reviewed his or her career and noted they had signed confidentiality agreements. The FERC and NERC observers were introduced and provided brief comment on their roles in the audit. A brief explanation of the audit process was given and the timelines were discussed. ISO-NE was given an opportunity to reject the auditors but accepted the auditors and their credentials for this audit. ISO-NE introduced their team and made presentations that clarified how business was conducted and in what areas responsibilities were assigned.

Audit

Prior to arrival at the site, Garth Arnott, as the overall lead auditor, assigned standards to each of the audit team members and developed teams of two or more to conduct the interviews. Each member, prior to arriving at the site, reviewed all data submitted for the standards assigned to them and produced a set of questions that required subject matter experts' responses. That team member then lead the on-site questioning and produced the RSAW for the standard. All other

team members participated in the question process. Some questions were resolved using the data provided in advance of the audit, and others were answered by follow-up data submittals during the site visit.

Exit Briefing

The exit briefing was conducted at the ISO-NE offices on April 24, 2009. The entire team of NPCC auditors, FERC and NERC observers, and ISO-NE staff attended. An audit presentation summarized the results of the audit. Of the 41 standards and 375 requirements and sub-requirements audited for the functions ISO-NE is registered, all standards and all but 8 requirements and sub-requirements were judged to be compliant; the remaining 8 were judged to be not applicable.

Company Profile

ISO New England Inc. is the independent, not-for-profit, Commission-approved Regional Transmission Organization, per the Commission's Order No. 2000 regulations, for New England.

ISO-NE operates the New England power system (69kV and above) and administers New England's organized wholesale electricity markets pursuant to the Transmission Operating Agreement with the New England Participating Transmission Owners, and the ISO New England Inc. Transmission, Markets and Services Tariff (all of which is available at: <http://www.iso-ne.com/regulatory/index>). In its capacity as an RTO, ISO-NE has the responsibility to protect the short-term reliability of its Balancing Authority Area.

A key aspect of ISO carrying out its responsibilities and authorities is that it coordinates with various regional (NPCC, New England Power Pool) technical and stakeholder committees. The Participants Agreement (also available at <http://www.iso-ne.com/regulatory/index>) describes ISO-NE's relationship with the New England Power Pool ("NEPOOL") and the manner in which ISO-NE obtains advisory input from NEPOOL.

This stakeholder relationship means that ISO-NE first presents any changes to its Agreements, Tariff provisions, Operating and Planning Procedures, and Market Rule Manuals to NEPOOL, and obtains its advisory input, prior to implementing any changes. Therefore, as a general matter, on matters relating to ISO's operating and planning processes and plans, ISO-NE seeks advisory input from the NEPOOL Participants Committee ("NPC"), and specifically, from the technical committees and task forces convened by the NPC. These can include, for example, the NEPOOL Reliability Committee (and technical Task Forces convened underneath it), or regional stakeholder groups (*e.g.*, Planning Advisory Committee, as concerns the Regional System Plan).

Audit Specifics

The compliance audit was conducted on April 20 to April 24, 2009 at ISO-NE offices in Holyoke, Massachusetts. The NPCC, NERC, FERC and ISO-NE teams are shown below.

NPCC Audit Team Role	Title	Company
Regional staff	Manager Compliance	NPCC-Compliance Audit Program
Overall Lead Auditor	Contracted Consultant	NPCC-Compliance Audit Program
Auditor	Contracted Consultant	NPCC-Compliance Audit Program
Auditor	Contracted Consultant	NPCC-Compliance Audit Program
Auditor	Contracted Consultant	NPCC-Compliance Audit Program
Auditor	Contracted Consultant	NPCC-Compliance Audit Program
Lead CIP Auditor	Compliance Engineer	NPCC-Compliance Audit Program
CIP Auditor	Contracted Consultant	NPCC-Compliance Audit Program

FERC Observers	Title	Company
Office of Electric Reliability	Electrical Engineer	FERC
Office of Electric Reliability	Electrical Engineer	FERC
Office of Enforcement	Economist	FERC
Office of Enforcement	Student Trainee (Economics)	FERC

NERC Observers	Title	Company
Compliance Audit Group	Compliance Auditor	NERC

ISO New England Inc.

Title	Organization
President & CEO	ISO-NE
Vice President, Chief Financial & Compliance Officer	ISO-NE
Senior Vice President, Chief Operations Officer	ISO-NE
Vice President, System Planning	ISO-NE
Vice President, System Operations	ISO-NE
Vice President, Information Services	ISO-NE
Director, Reliability & Operations Compliance	ISO-NE
Manager, Cyber Security	ISO-NE
Lead Security Consultant	ISO-NE
Supervisor, Operations Technical Studies	ISO-NE
Manager, Control Room Operations	ISO-NE
Manager, Area Transmission Planning	ISO-NE
Shift Supervisor Operations	ISO-NE
Senior System Operator	ISO-NE
System Operator	ISO-NE
Director, Transmission Planning	ISO-NE
Supervisor, Short-Term Outages	ISO-NE
Supervisor, Real-Time Support	ISO-NE
Reliability Coordinator	ISO-NE
Principal Analyst, Reliable Services	ISO-NE
Principal Scientist	ISO-NE
Lead Engineer	ISO-NE
Senior Operations Compliance Coordinator	ISO-NE
Manager, Area Transmission	ISO-NE

Planning	
Principal Engineer	ISO-NE
Operations Tariff & Agreement Manager	ISO-NE
Lead Engineer	ISO-NE
Manager, Corporate Planning	ISO-NE
Supervisor, IT Change Management	ISO-NE
Manager, Power System Modeling Management	ISO-NE
Principal Engineer	ISO-NE
Compensation Specialist	ISO-NE
Administrative Assistant	ISO-NE

Audit Results

The on-site compliance audit of ISO New England Inc. (ISO-NE) was conducted between April 20 and April 24, 2009. The audit was completed using data submitted by ISO New England Inc. prior to the start of the on-site audit and data provided while on-site as a result of questions that arose during the on-site portion of the audit.

The auditor evaluated ISO New England Inc.'s compliance with 41 reliability standards and 324 requirements/sub-requirements identified in the NERC 2009 Implementation Plan for the period of the last twelve months or monitoring timeframes specified in each reliability standard. An additional 51 requirements and sub-requirements were evaluated for compliance during the audit to insure compliance in other areas.

CIP standards 2, 3, 4, 7, 8 and 9 were audited. Although CIP 2 to 9 audits were not scheduled to begin until July 1, 2009, ISO-NE volunteered to be audited during the scheduled on-site audit. Evidence used to determine compliance with the CIP standards was judged to be sensitive; as a result, no evidence was removed from the ISO-NE site. A custody letter was put in place and copies of all evidence were placed in a sealed envelope in the possession of the Cyber Security Manager. The custody agreement allows NPCC access to the data at ISO-NE offices, if required, at a future date.

Of the 41 standards and 375 requirements and sub-requirements audited for the functions ISO-NE is registered, all standards and all but 8 requirements and sub-requirements were judged to be compliant; those 8 were judged to be not applicable.

Findings

The following table details the summarized auditor notes relating to evidence reviewed for compliance with the reliability standards listed in the NERC 2009 Implementation Plan. This

table can also include details summarizing auditor notes relating to evidence reviewed for reliability standard requirements for self-reported violations, ongoing mitigation plans, and other discussions.

This public audit report depicts all activities performed by the audit team during the audit. Some information discussed during the course of the audit is non-public. Any non-public information has been redacted from this report.

Reliability Standard	Requirement	Finding
BAL-002-0	R1.	Compliant
BAL-002-0	R1.1.	Compliant
BAL-002-0	R3.	Compliant
BAL-002-0	R3.1.	Compliant
BAL-005-0b	R2.	Compliant
BAL-005-0b	R10.	N/A
CIP-001-1	R1.	Compliant
CIP-001-1	R2.	Compliant
CIP-001-1	R3.	Compliant
CIP-001-1	R4.	Compliant
CIP-002-1	R1, 1.1, 1.2, 1.2.1, 1.2.2, 1.2.3, 1.2.4, 1.2.5, 1.2.6, and 1.2.7	Compliant
CIP-002-1	R2	Compliant
CIP-002-1	R3, 3.1, 3.2 and 3.3	Compliant
CIP-002-1	R4	Compliant
CIP-003-1	R1, 1.1, 1.2, and 1.3	Compliant
CIP-003-1	R2, 2.1, 2.2 and 2.3	Compliant
CIP-003-1	R3, 3.1, 3.2, and 3.3	Compliant
CIP-004-1	R2, 2.1, 2.2, 2.2.1, 2.2.2, 2.2.3, 2.2.4 and 2.3	Compliant
CIP-004-1	R3, 3.1, 3.2 and 3.3	Compliant
CIP-004-1	R4	Compliant
CIP-007	R1, 1.1, 1.2 and 1.3	Compliant
CIP-008	R1, 1.1, 1.2, 1.3, 1.4, 1.5 and 1.6	Compliant
CIP-009-1	R1, 1.1, 1.2 and 1.3	Compliant
CIP-009-1	R2	Compliant
CIP-009-1	R3	Compliant
CIP-009-1	R4	Compliant
CIP-009-1	R5	Compliant

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Reliability Standard	Requirement	Finding
COM-001-1	R1.	Compliant
COM-001-1	R1.1.	Compliant
COM-001-1	R1.2.	Compliant
COM-001-1	R1.3.	Compliant
COM-001-1	R1.4.	Compliant
COM-002-2	R1.	Compliant
COM-002-2	R1.1.	Compliant
COM-002-2	R2.	Compliant
EOP-001-0	R1.	Compliant
EOP-001-0	R2.	Compliant
EOP-001-0	R3.	Compliant
EOP-001-0	R3.1.	Compliant
EOP-001-0	R3.2.	Compliant
EOP-001-0	R3.3.	Compliant
EOP-001-0	R3.4.	Compliant
EOP-001-0	R4.	Compliant
EOP-001-0	R4.1.	Compliant
EOP-001-0	R4.2.	Compliant
EOP-001-0	R4.3.	Compliant
EOP-001-0	R4.4.	Compliant
EOP-001-0	R5.	Compliant
EOP-001-0	R6.	Compliant
EOP-001-0	R7.	Compliant
EOP-001-0	R7.1.	Compliant
EOP-001-0	R7.2.	Compliant
EOP-001-0	R7.3.	Compliant
EOP-001-0	R7.4.	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	R6.1.	Compliant
EOP-002-2	R6.2.	Compliant
EOP-002-2	R6.3.	Compliant
EOP-002-2	R6.4.	Compliant
EOP-002-2	R6.5.	Compliant
EOP-002-2	R6.6.	Compliant

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Reliability Standard	Requirement	Finding
EOP-002-2	R7.	Compliant
EOP-002-2	R7.1.	Compliant
EOP-002-2	R7.2.	Compliant
EOP-002-2	R8.	N/A
EOP-002-2	R9.	N/A
EOP-002-2	R9.1.	N/A
EOP-002-2	R9.2.	N/A
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-005-1	R1.	Compliant
EOP-005-1	R2.	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	R10.1.	Compliant
EOP-005-1	R11.	Compliant
EOP-005-1	R11.1.	Compliant
EOP-005-1	R11.2.	Compliant
EOP-005-1	R11.3.	Compliant
EOP-005-1	R11.4.	Compliant
EOP-005-1	R11.5.	Compliant
EOP-005-1	R11.5.1.	Compliant
EOP-005-1	R11.5.2.	Compliant
EOP-005-1	R11.5.3.	Compliant
EOP-005-1	R11.5.4.	Compliant
EOP-006-1	R1.	Compliant
EOP-006-1	R2.	Compliant
EOP-006-1	R3.	Compliant
EOP-006-1	R4.	Compliant
EOP-006-1	R5.	Compliant

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Reliability Standard	Requirement	Finding
EOP-006-1	R6.	Compliant
EOP-008-0	R1.	Compliant
EOP-008-0	R1.1.	Compliant
EOP-008-0	R1.2.	Compliant
EOP-008-0	R1.3.	Compliant
EOP-008-0	R1.4.	Compliant
EOP-008-0	R1.5.	Compliant
EOP-008-0	R1.6.	Compliant
EOP-008-0	R1.7.	Compliant
EOP-008-0	R1.8.	Compliant
FAC-010-1	R2.1.	Compliant
FAC-010-1	R2.2.	Compliant
FAC-010-1	R2.2.1.	Compliant
FAC-010-1	R2.2.2.	Compliant
FAC-010-1	R2.2.3.	Compliant
FAC-011-1	R2.1.	Compliant
FAC-011-1	R2.2.	Compliant
FAC-011-1	R2.2.1.	Compliant
FAC-011-1	R2.2.2.	Compliant
FAC-011-1	R2.2.3.	Compliant
FAC-014-1	R5.	Compliant
FAC-014-1	R5.1.	Compliant
FAC-014-1	R5.1.1.	Compliant
FAC-014-1	R5.1.2.	Compliant
FAC-014-1	R5.1.3.	Compliant
FAC-014-1	R5.1.4.	Compliant
IRO-001-1	R2.	Compliant
IRO-001-1	R3.	Compliant
IRO-001-1	R7.	Compliant
IRO-001-1	R8.	Compliant
IRO-001-1	R9.	Compliant
IRO-002-1	R1.	Compliant
IRO-002-1	R2.	Compliant
IRO-002-1	R3.	Compliant
IRO-002-1	R4.	Compliant
IRO-002-1	R5.	Compliant
IRO-002-1	R6.	Compliant
IRO-002-1	R7.	Compliant
IRO-002-1	R8.	Compliant

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Reliability Standard	Requirement	Finding
IRO-003-2	R1.	Compliant
IRO-003-2	R2.	Compliant
IRO-004-1	R1.	Compliant
IRO-004-1	R2.	N/A
IRO-004-1	R3.	Compliant
IRO-004-1	R4.	Compliant
IRO-004-1	R5.	Compliant
IRO-004-1	R6.	Compliant
IRO-004-1	R7.	Compliant
IRO-005-1	R1.	Compliant
IRO-005-1	R1.1.	Compliant
IRO-005-1	R1.10.	Compliant
IRO-005-1	R1.2.	Compliant
IRO-005-1	R1.3.	Compliant
IRO-005-1	R1.4.	Compliant
IRO-005-1	R1.5.	Compliant
IRO-005-1	R1.6.	Compliant
IRO-005-1	R1.7.	Compliant
IRO-005-1	R1.8.	Compliant
IRO-005-1	R1.9.	Compliant
IRO-005-1	R2.	Compliant
IRO-005-1	R3.	Compliant
IRO-005-1	R4.	Compliant
IRO-005-1	R5.	Compliant
IRO-005-1	R6.	Compliant
IRO-005-1	R7.	Compliant
IRO-005-1	R8.	Compliant
IRO-005-1	R9.	Compliant
IRO-005-1	R10.	Compliant
IRO-005-1	R11.	Compliant
IRO-005-1	R12.	Compliant
IRO-005-1	R13.	Compliant
IRO-005-1	R14.	Compliant
IRO-005-1	R15.	Compliant
IRO-005-1	R16.	Compliant
IRO-005-1	R17.	Compliant
IRO-006-3	R1.	Compliant
IRO-006-3	R2.	Compliant
IRO-006-3	R3.	Compliant

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Reliability Standard	Requirement	Finding
IRO-006-3	R4.	Compliant
IRO-006-3	R5.	Compliant
IRO-006-3	R6.	Compliant
PER-001-0	R1.	Compliant
PER-002-0	R1.	Compliant
PER-002-0	R2.	Compliant
PER-002-0	R2.1.	Compliant
PER-002-0	R2.2.	Compliant
PER-002-0	R3.	Compliant
PER-002-0	R3.1.	Compliant
PER-002-0	R3.2.	Compliant
PER-002-0	R3.3.	Compliant
PER-002-0	R3.4.	Compliant
PER-002-0	R4.	Compliant
PER-003-0	R1.	Compliant
PER-003-0	R1.1.	Compliant
PER-003-0	R1.2.	Compliant
PER-004-1	R1.	Compliant
PER-004-1	R2.	Compliant
PER-004-1	R3.	Compliant
PER-004-1	R4.	Compliant
PER-004-1	R5.	Compliant
PRC-001-1	R1.	Compliant
PRC-001-1	R2.	Compliant
PRC-001-1	R2.2.	Compliant
PRC-001-1	R3.2.	Compliant
PRC-001-1	R4.	Compliant
PRC-001-1	R5.	Compliant
PRC-001-1	R5.2.	Compliant
PRC-001-1	R6.	Compliant
TOP-001-1	R1.	Compliant
TOP-001-1	R2.	Compliant
TOP-001-1	R3.	Compliant
TOP-001-1	R5.	Compliant
TOP-001-1	R6.	Compliant
TOP-001-1	R7.	Compliant
TOP-001-1	R7.1.	Compliant
TOP-001-1	R7.2.	Compliant
TOP-001-1	R7.3.	Compliant

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Reliability Standard	Requirement	Finding
TOP-001-1	R8.	Compliant
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	R16.	Compliant
TOP-002-2	R16.1.	Compliant
TOP-002-2	R16.2.	Compliant
TOP-002-2	R17.	Compliant
TOP-002-2	R18.	Compliant
TOP-002-2	R19.	Compliant
TOP-004-2	R1.	Compliant
TOP-004-2	R2.	Compliant
TOP-004-2	R3.	Compliant
TOP-004-2	R4.	Compliant
TOP-004-2	R5.	Compliant
TOP-004-2	R6.	Compliant
TOP-004-2	R6.1.	Compliant
TOP-004-2	R6.2.	Compliant
TOP-004-2	R6.3.	Compliant
TOP-004-2	R6.4.	Compliant
TOP-004-2	R6.5.	Compliant
TOP-004-2	R6.6.	Compliant
TOP-006-1	R1.	Compliant
TOP-006-1	R1.2.	Compliant
TOP-006-1	R2.	Compliant
TOP-006-1	R3.	Compliant
TOP-006-1	R4.	Compliant
TOP-006-1	R5.	Compliant
TOP-006-1	R6.	Compliant
TOP-006-1	R7.	Compliant
TOP-007-0	R1.	Compliant

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Reliability Standard	Requirement	Finding
TOP-007-0	R2.	Compliant
TOP-007-0	R3.	Compliant
TOP-007-0	R4.	Compliant
TOP-008-1	R1.	Compliant
TOP-008-1	R2.	Compliant
TOP-008-1	R3.	N/A
TOP-008-1	R4.	Compliant
TPL-001-0	R1.	Compliant
TPL-001-0	R1.1.	Compliant
TPL-001-0	R1.2.	Compliant
TPL-001-0	R1.3.	Compliant
TPL-001-0	R1.3.1.	Compliant
TPL-001-0	R1.3.2.	Compliant
TPL-001-0	R1.3.3.	Compliant
TPL-001-0	R1.3.4.	Compliant
TPL-001-0	R1.3.5.	Compliant
TPL-001-0	R1.3.6.	Compliant
TPL-001-0	R1.3.7.	Compliant
TPL-001-0	R1.3.8.	Compliant
TPL-001-0	R1.3.9.	Compliant
TPL-001-0	R1.4.	Compliant
TPL-002-0	R1.	Compliant
TPL-002-0	R1.1.	Compliant
TPL-002-0	R1.2.	Compliant
TPL-002-0	R1.3.	Compliant
TPL-002-0	R1.3.1.	Compliant
TPL-002-0	R1.3.10.	Compliant
TPL-002-0	R1.3.11.	Compliant
TPL-002-0	R1.3.12.	Compliant
TPL-002-0	R1.3.2.	Compliant
TPL-002-0	R1.3.3.	Compliant
TPL-002-0	R1.3.4.	Compliant
TPL-002-0	R1.3.5.	Compliant
TPL-002-0	R1.3.6.	Compliant
TPL-002-0	R1.3.7.	Compliant
TPL-002-0	R1.3.8.	Compliant
TPL-002-0	R1.3.9.	Compliant
TPL-002-0	R1.4.	Compliant
TPL-002-0	R1.5.	Compliant

Reliability Standard	Requirement	Finding
TPL-003-0	R1.	Compliant
TPL-003-0	R1.1.	Compliant
TPL-003-0	R1.2.	Compliant
TPL-003-0	R1.3.	Compliant
TPL-003-0	R1.3.1.	Compliant
TPL-003-0	R1.3.10.	Compliant
TPL-003-0	R1.3.11.	Compliant
TPL-003-0	R1.3.12.	Compliant
TPL-003-0	R1.3.2.	Compliant
TPL-003-0	R1.3.3.	Compliant
TPL-003-0	R1.3.4.	Compliant
TPL-003-0	R1.3.5.	Compliant
TPL-003-0	R1.3.6.	Compliant
TPL-003-0	R1.3.7.	Compliant
TPL-003-0	R1.3.8.	Compliant
TPL-003-0	R1.3.9.	Compliant
TPL-003-0	R1.4.	Compliant
TPL-003-0	R1.5.	Compliant
VAR-001-1	R1.	Compliant
VAR-001-1	R2.	Compliant
VAR-001-1	R5.	N/A
VAR-001-1	R7.	Compliant
VAR-001-1	R8.	Compliant
VAR-001-1	R9.	Compliant
VAR-001-1	R9.1.	Compliant
VAR-001-1	R10.	Compliant
VAR-001-1	R12.	Compliant

Compliance Culture

The audit team reviewed ISO New England Inc.'s compliance culture. During all contacts, ISO-NE staff was professional in their approach to compliance and understood the importance of the compliance and its role in maintaining reliability. The compliance department head is a direct report to the CFO/CCO, who reports directly to the CEO, and has board access. The department consists of five highly experienced people with diverse backgrounds. It is clear that compliance is an integral component of ISO-NE operation.

