



Compliance Audit Report Public Version

**City of Springfield, IL - CWLP
NCR01328**

March 30 – April 1, 2009

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

May 7, 2009

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EXECUTIVE SUMMARY

This final compliance audit report is the public version. Confidential information (including privileged and critical energy infrastructure information) has been redacted from this report. The full final compliance audit report was submitted to the audited entity and NERC.

The City of Springfield, IL (CWLP) was audited on March 30-April 1, 2009 for compliance with the requirements contained in the currently mandatory and enforceable reliability standards in the 2009 NERC Compliance Monitoring and Enforcement Program (CMEP) that are applicable to CWLP's registered functions. CWLP is registered with SERC Reliability Corporation (SERC) as a Balancing Authority (BA), Distribution Provider (DP), Generator Operator (GOP), Generator Owner (GO), Load-Serving Entity (LSE), Resource Planner (RP), Transmission Owner (TO), Transmission Operator (TOP), and Transmission Planner (TP). Thirty-seven standards were selected and identified to CWLP as subject to review during this audit. The audit focused on documents and other evidence provided to SERC by the CWLP staff, and did not include any evidence obtained through system observation or inspection. The findings of the audit are based on the state of compliance and current mitigation activity at the time of the audit, and do not reflect past compliance activities or activities that will be completed in the future. CWLP's staff was requested to provide an informational presentation on their progress with implementation of Cyber Security Standards CIP-002-1 through CIP-009-1.

CWLP staff was requested to provide valid evidence of meeting each and every applicable requirement and sub-requirement contained in each standard that had been previously identified by SERC Compliance staff to CWLP as subject to this audit. CWLP staff responded by providing evidence in the form of reports, procedures, studies, and other documents. CWLP staff then cited specific portions of the evidence that demonstrated compliance. This evidence and the citations were documented and evaluated by the audit team to assess the level of compliance. If all of the requirements and sub-requirements of an audited standard were met, then CWLP was judged to be compliant. Likewise, if any of the requirements or sub-requirements were not fully met, then CWLP was judged to have a possible violation of the standard. A score of 100% is required for compliance.

The audit team found CWLP to be in compliance with all of the NERC Reliability Standards in the audit scope.

The audit team determined that CWLP does not own or operate Special Protection Systems, nor do they own any transmission facilities above 200 kV. Therefore, 2 of the 37 standards audited were not applicable to CWLP. These standards are FAC-003 and PRC-017.

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:

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

- Independently review CWLP's compliance with the requirements of the reliability standards that are applicable to CWLP based on the CWLP registered functions.
- Validate compliance with applicable reliability standards from the NERC 2009 Implementation Plan list of actively monitored standards.
- Validate evidence of self-reported violations and previous self-certifications, confirm compliance with other requirements of the reliability standard, and review the status of associated mitigation plans.
- Document CWLP's compliance culture.

Scope

The scope of the audit of CWLP included all monitored standards that are in the NERC 2009 CMEP. Based on the confirmed registration of CWLP, the 37 reliability standards previously identified were the focus of the compliance audit. Of these, 37 standards; FAC-003-1 and PRC-017-0 were not applicable. This is detailed in the Audit Results section.

Note: For the 2009 compliance program, the monitoring period for the compliance audit will generally be the lesser of: 1) Date of registration to current date; 2) Date of last audit to current date; or, 3) June 18, 2007 to current date. The monitoring period is not limited to the time period for which penalties and sanctions are assessed

Confidentiality and Conflict of Interest

Code of conduct documentation for the NERC representative and regional entity staff were provided to CWLP in advance of the audit. Work history and conflict of interest forms submitted by each audit team member were provided to CWLP upon request. SERC has confirmed that confidentiality agreements have been executed by, and are on file for SERC Industry Subject Matter Experts (SME's) who participated in the audit. CWLP 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. CWLP accepted the audit team member participants with no objections.

On-site Audit

CWLP was contacted by letter on October 1, 2008 by SERC staff. The letter provided CWLP with their initial notification of their upcoming audit in 2009, and the desire to schedule audit dates that would be acceptable to both parties. SERC staff then provided formal acknowledgement of the scheduled audit dates and requested that CWLP both verify their currently registered functions and complete and return an attached Pre-Audit Survey within 30 days.

On January 24, 2009, SERC staff forwarded an Audit Detail Letter to CWLP, again confirming the scheduled audit dates and confirming CWLP's registered functions within SERC. The Audit Detail Letter also provided CWLP with notice of the Standards in Audit Scope, Proposed Audit Schedule, Audit Team Roster (with industry affiliations), and requested that CWLP Subject Matter Experts (SMEs) responsible for and knowledgeable of compliance submittals be available for interview during the audit. In addition to the Audit Detail Letter, CWLP was provided with a Non-Disclosure Agreement Signature Verification for audit team members, a Pre-Audit Questionnaire, a list of Documentation and Evidence Requirements, and Reliability Standard Auditor Worksheets (RSAWs) for each standard to be audited.

Interviews with SMEs were requested, in conjunction with documented evidence, to provide the audit team with additional information or clarification as a basis for professional judgment when validating compliance with reliability standards.

On February 11, 2009, SERC staff forwarded a revised version of the Audit Detail Letter to CWLP which reflected changes to the Audit Team members.

Methodology

A team of auditors and Industry SMEs were identified and conducted the audit of CWLP. The standards were grouped and scheduled for review to make the most efficient use of CWLP staff's time. The audit team moderator (ATL or designee) initiated dialogue on each standard requirement and requested compliance evidence. This evidence and CWLP's staff response was documented. CWLP staff was requested to show valid evidence of meeting each applicable requirement and sub-requirement contained in the 37 standards that had been previously identified by SERC to CWLP as subject to this audit. CWLP staff responded by providing evidence in the form of reports, procedures, studies, and other documents. CWLP staff would then cite specific portions of the evidence that demonstrated compliance.

This evidence and the citations were documented by the audit team scribe on the RSAWs and evaluated by the audit team for the level of compliance and agreement with the requirement. Discrepancies between the requirement and the evidence provided were the subject of dialogue among the team members and CWLP staff members until it was determined that each requirement was met by the cited evidence or other evidence offered.

Once all the evidence was presented and discussed, if CWLP did not provide sufficient evidence to support a finding of compliance, then a possible violation was identified by the team and CWLP staff was informed.

Audit Overview

The audit team arrived at the CWLP offices at 3:20 PM, March 30, 2009. The audit team privately reviewed team assignments and a general overview for preparation of the audit activities. At 4:00 PM on March 30, 2009 Steve Gibe, Senior Compliance Auditor and Audit Team Lead (ATL) welcomed CWLP staff to the meeting room and began the session with an opening presentation. He reviewed the NERC compliance plan for 2009 in general, and how it applied to CWLP specifically. The ATL introduced and reviewed the standards to be covered in the audit, and addressed both the expectations of CWLP staff and the quality of evidence to be presented. The ATL also covered the basic procedure for the audit, and the bounding rules of conduct. CWLP staff made a brief presentation describing CWLP's corporate structure, electric system, and compliance program. The staff of CWLP was introduced, and general housekeeping matters explained. The audit team left the CWLP office at 4:46 PM, March 30, 2009 to return the next day to start the review of the reliability standards in the audit scope.

Audit

The audit team arrived at the CWLP office at 7:50 AM, March 31, 2009. The audit team was divided into two sub-teams.

The audit team initially reviewed the registration status of CWLP with entity staff to verify applicability of each standard. Each standard's audit began with a recitation of each requirement. CWLP staff then presented evidence supporting requirement compliance, or cited evidence previously provided to the audit team. At that point, the evidence was reviewed and discussed until the team reached agreement on the evidence. By audit team consensus a

determination of compliance was reached for each of the requirements and communicated to CWLP staff before proceeding to the next requirement. At that point the team scribe would record the evidence presented to satisfy the requirement and the team's recommendation on that requirement using the RSAWs.

The review of all applicable standards was completed at 3:40 PM, April 1, 2009 and the audit team met to review and discuss the findings. Following these discussions, the scribe collected all notes and evidence as needed and began to finalize the RSAWs.

Exit Briefing

The ATL presented an exit briefing to the assembled audit team and entity staff at 4:00 PM, April 1, 2009. This was followed by an informal question and response session between the CWLP staff and SERC Audit Team members. The exit briefing summarized the team's preliminary conclusions, including any items of potential noncompliance or possible violations with supporting information, areas of concern, any added information required and the expected timeline for review and issuance of the audit report.

The ATL solicited both informal comments from CWLP staff, along with requesting that they fill out formal feedback forms for submission to NERC and SERC.

The ATL thanked CWLP staff for their cooperation and support of the audit process. CWLP staff expressed their appreciation of the professional manner in which the audit was conducted.

The audit team left the CWLP meeting room at 5:14 PM on April 1, 2009.

Company Profile

The City of Springfield, IL (CWLP) is entirely owned by its ratepayers and is not affiliated with any other company. CWLP is the sole electrical supplier for the residents and businesses of Springfield, IL. The Electric Division serves approximately 69,000 metered customers in an eighty-square-mile service territory, and, through negotiated agreements, provides wholesale power to the Village of Chatham, IL. The total population served by CWLP is over 131,000.

CWLP's generating facilities include the Dallman and Lakeside coal-fired power plants, three combustion turbines, and three diesel generators for a total summer maximum net capability of 619 MW. On July 31, 2006, CWLP supplied a historical peak demand of 451 MW.

CWLP's electric transmission network consists of lines and associated substations operating at voltages of 138 kV and 69 kV. The 138 kV portion includes approximately 64 circuit-miles of overhead lines forming a complete loop around CWLP's service area. The 69 kV portion consists of approximately 66 circuit-miles of overhead lines serving 28 substations. CWLP has five ties to the transmission grid: one with PJM at 345 kV, one with AmerenCILCO at 138 kV, one with AmerenIP at 138 kV, and two with AmerenCIPS at 138 kV and 69 kV each.

CWLP has under construction a new coal-fired generation unit at the Dallman location coming online in 2009. To accommodate the output of this new unit, two new 138 kV ties with AmerenCILCO to the transmission grid are being installed. The Lakeside coal-fired generation plant will be retired following commercial operation of the new Dallman 4 unit, resulting in a total summer maximum net capability of 743 MW.

CWLP is a signatory to the Midwest Independent Transmission System Operator (MISO) Transmission Owners Agreement and a Transmission Interconnection Agreement with Ameren

Services Company and MISO. CWLP is a member entity to Joint Registration Organization JRO00001 for shared and wholly-delegated balancing authority functions with the MISO Balancing Authority. CWLP is a member of the SERC Reliability Corporation (Gateway Subregion).

Audit Specifics

The compliance audit was conducted March 30 – April 1, 2009 at the CWLP offices in Springfield, IL.

Audit Team

Audit Team Role	Title	Company
Lead	Senior Compliance Auditor	SERC
Member	Associate Compliance Auditor	SERC
Member	Senior Compliance Auditor	SERC
Member	Senior Compliance Auditor	SERC
Member	Manager of Compliance Audits	SERC
Member	CIP Auditor	SERC
Member	Compliance CIP Coordinator	SERC
Member	SERC Industry Subject Matter Expert	Entergy
Member	SERC Industry Subject Matter Expert	Southern Company

CWLP Audit Participants Title and Organization

Title	Organization
Superintendent of Electric Operations	CWLP
Operations Planning Coordinator	CWLP
Supervisor, Electric Planning	CWLP
Planning Engineer	CWLP
Planning Engineer	CWLP
Superintendent, T&D Engineering	CWLP
Maintenance Supervisor	CWLP
Relay Engineer	CWLP
Engineer III	CWLP
Substation Engineer	CWLP
Electric System Dispatcher	CWLP
Asst. Superintendent of Electric Operations	CWLP
Communications Engineer	CWLP
Controls Engineer	CWLP
Electric System Dispatcher	CWLP
Relief Electric System Dispatcher	CWLP

AUDIT RESULTS

The audit team found CWLP to be in compliance with all of the NERC Reliability Standards in the audit scope. Please see Findings Table below.

Findings

Reliability Standard	Requirement	Finding
BAL-001-0a	R1.	N/A
BAL-001-0a	R2.	N/A
BAL-001-0a	R3.	N/A
BAL-001-0a	R4.	N/A
BAL-002-0	R1.	Compliant
BAL-002-0	R2.	N/A
BAL-002-0	R3.	Compliant
BAL-002-0	R4.	N/A
BAL-002-0	R5.	N/A
BAL-002-0	R6.	N/A
BAL-003-0a	R1.	N/A
BAL-003-0a	R2.	N/A
BAL-003-0a	R3.	N/A
BAL-003-0a	R4.	N/A
BAL-003-0a	R5.	N/A
BAL-003-0a	R6.	N/A
BAL-004-0	R1.	N/A
BAL-004-0	R2.	N/A
BAL-004-0	R3.	N/A
BAL-004-0	R4.	N/A
BAL-005-0b	R1.	N/A
BAL-005-0b	R2.	Compliant
BAL-005-0b	R3.	N/A
BAL-005-0b	R4.	N/A
BAL-005-0b	R5.	N/A
BAL-005-0b	R6.	N/A
BAL-005-0b	R7.	N/A
BAL-005-0b	R8.	N/A
BAL-005-0b	R9.	N/A
BAL-005-0b	R10.	Compliant
BAL-005-0b	R11.	N/A
BAL-005-0b	R12.	N/A
BAL-005-0b	R13.	N/A
BAL-005-0b	R14.	N/A
BAL-005-0b	R15.	N/A
BAL-005-0b	R16.	N/A
BAL-005-0b	R17.	N/A
BAL-006-1	R1.	N/A
BAL-006-1	R2.	N/A
BAL-006-1	R3.	N/A

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

Reliability Standard	Requirement	Finding
BAL-006-1	R4.	N/A
BAL-006-1	R5.	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 through CIP-009-1	.	N/A
COM-001-1	R1.	Compliant
COM-001-1	R2.	N/A
COM-001-1	R3.	N/A
COM-001-1	R4.	N/A
COM-001-1	R5.	N/A
COM-001-1	R6.	N/A
COM-002-2	R1.	Compliant
COM-002-2	R2.	N/A
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	R8.	N/A
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	R1.	N/A
EOP-004-1	R2.	N/A
EOP-004-1	R3.	N/A

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Reliability Standard	Requirement	Finding
EOP-004-1	R4.	N/A
EOP-004-1	R5.	N/A
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-006-1	R1.	N/A
EOP-006-1	R2.	N/A
EOP-006-1	R3.	N/A
EOP-006-1	R4.	N/A
EOP-006-1	R5.	N/A
EOP-006-1	R6.	N/A
EOP-008-0	R1.	Compliant
EOP-009-0	R1.	N/A
EOP-009-0	R2.	N/A
FAC-001-0	R1.	Compliant
FAC-001-0	R2.	Compliant
FAC-001-0	R3.	Compliant
FAC-002-0	R1.	N/A
FAC-002-0	R2.	N/A
FAC-003-1	R1.	N/A
FAC-003-1	R2.	N/A
FAC-003-1	R3.	N/A
FAC-003-1	R4.	N/A
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
FAC-010-1	R1.	N/A
FAC-010-1	R2.	N/A
FAC-010-1	R3.	N/A
FAC-010-1	R4.	N/A
FAC-010-1	R5.	N/A
FAC-011-1	R1.	N/A

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Reliability Standard	Requirement	Finding
FAC-011-1	R2.	N/A
FAC-011-1	R3.	N/A
FAC-011-1	R4.	N/A
FAC-011-1	R5.	N/A
FAC-013-1	R1.	N/A
FAC-013-1	R2.	N/A
FAC-014-1	R1.	N/A
FAC-014-1	R2.	N/A
FAC-014-1	R3.	N/A
FAC-014-1	R4.	N/A
FAC-014-1	R5.	Compliant
FAC-014-1	R6.	N/A
INT-001-3	R1.	N/A
INT-001-3	R2.	N/A
INT-003-2	R1.	N/A
INT-004-2	R1.	N/A
INT-004-2	R2.	N/A
INT-005-2	R1.	N/A
INT-006-2	R1.	N/A
INT-007-1	R1.	N/A
INT-008-2	R1.	N/A
INT-009-1	R1.	N/A
INT-010-1	R1.	N/A
INT-010-1	R2.	N/A
INT-010-1	R3.	N/A
IRO-001-1	R1.	N/A
IRO-001-1	R2.	N/A
IRO-001-1	R3.	N/A
IRO-001-1	R4.	N/A
IRO-001-1	R5.	N/A
IRO-001-1	R6.	N/A
IRO-001-1	R7.	N/A
IRO-001-1	R8.	Compliant
IRO-001-1	R9.	N/A
IRO-002-1	R1.	N/A
IRO-002-1	R2.	N/A
IRO-002-1	R3.	N/A
IRO-002-1	R4.	N/A
IRO-002-1	R5.	N/A
IRO-002-1	R6.	N/A
IRO-002-1	R7.	N/A
IRO-002-1	R8.	N/A

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Reliability Standard	Requirement	Finding
IRO-002-1	R9.	N/A
IRO-003-2	R1.	N/A
IRO-003-2	R2.	N/A
IRO-004-1	R1.	N/A
IRO-004-1	R2.	N/A
IRO-004-1	R3.	Compliant
IRO-004-1	R4.	Compliant
IRO-004-1	R5.	N/A
IRO-004-1	R6.	N/A
IRO-004-1	R7.	Compliant
IRO-005-2	R1.	N/A
IRO-005-2	R2.	N/A
IRO-005-2	R3.	N/A
IRO-005-2	R4.	N/A
IRO-005-2	R5.	N/A
IRO-005-2	R6.	N/A
IRO-005-2	R7.	N/A
IRO-005-2	R8.	Compliant
IRO-005-2	R9.	N/A
IRO-005-2	R10.	N/A
IRO-005-2	R11.	N/A
IRO-005-2	R12.	N/A
IRO-005-2	R13.	Compliant
IRO-005-2	R14.	N/A
IRO-005-2	R15.	N/A
IRO-005-2	R16.	N/A
IRO-005-2	R17.	N/A
IRO-006-3	R1.	N/A
IRO-006-3	R2.	N/A
IRO-006-3	R3.	N/A
IRO-006-3	R4.	N/A
IRO-006-3	R5.	N/A
IRO-006-3	R6.	Compliant
IRO-014-1	R1.	N/A
IRO-014-1	R2.	N/A
IRO-014-1	R3.	N/A
IRO-014-1	R4.	N/A
IRO-015-1	R1.	N/A
IRO-015-1	R2.	N/A
IRO-015-1	R3.	N/A
IRO-016-1	R1.	N/A
IRO-016-1	R2.	N/A

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Reliability Standard	Requirement	Finding
MOD-006-0	R1.	N/A
MOD-006-0	R2.	N/A
MOD-007-0	R1.	N/A
MOD-007-0	R2.	N/A
MOD-010-0	R1.	N/A
MOD-010-0	R2.	N/A
MOD-012-0	R1.	N/A
MOD-012-0	R2.	N/A
MOD-016-1	R1.	N/A
MOD-016-1	R2.	N/A
MOD-016-1	R3.	N/A
MOD-017-0	R1.	N/A
MOD-018-0	R1.	N/A
MOD-018-0	R2.	N/A
MOD-019-0	R1.	N/A
MOD-020-0	R1.	N/A
MOD-021-0	R1.	N/A
MOD-021-0	R2.	N/A
MOD-021-0	R3.	N/A
NUC-001-1	R1.	N/A
NUC-001-1	R2.	N/A
NUC-001-1	R3.	N/A
NUC-001-1	R4.	N/A
NUC-001-1	R5.	N/A
NUC-001-1	R6.	N/A
NUC-001-1	R7.	N/A
NUC-001-1	R8.	N/A
NUC-001-1	R9.	N/A
PER-001-0	R1.	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
PER-004-1	R1.	N/A
PER-004-1	R2.	N/A
PER-004-1	R3.	N/A
PER-004-1	R4.	N/A
PER-004-1	R5.	N/A
PRC-001-1	R1.	Compliant
PRC-001-1	R2.	Compliant
PRC-001-1	R3.	Compliant

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Reliability Standard	Requirement	Finding
PRC-001-1	R4.	Compliant
PRC-001-1	R5.	Compliant
PRC-001-1	R6.	N/A
PRC-004-1	R1.	Compliant
PRC-004-1	R2.	Compliant
PRC-004-1	R3.	Compliant
PRC-005-1	R1.	Compliant
PRC-005-1	R2.	Compliant
PRC-007-0	R1.	N/A
PRC-007-0	R2.	N/A
PRC-007-0	R3.	N/A
PRC-008-0	R1.	Compliant
PRC-008-0	R2.	Compliant
PRC-009-0	R1.	N/A
PRC-009-0	R2.	N/A
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-015-0	R1.	N/A
PRC-015-0	R2.	N/A
PRC-015-0	R3.	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-018-1	R1.	N/A
PRC-018-1	R2.	N/A
PRC-018-1	R3.	N/A
PRC-018-1	R4.	N/A
PRC-018-1	R5.	N/A
PRC-018-1	R6.	N/A
PRC-021-1	R1.	N/A
PRC-021-1	R2.	N/A
PRC-022-1	R1.	N/A
PRC-022-1	R2.	N/A
TOP-001-1	R1.	Compliant
TOP-001-1	R2.	Compliant
TOP-001-1	R3.	Compliant
TOP-001-1	R4.	Compliant
TOP-001-1	R5.	Compliant

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

Reliability Standard	Requirement	Finding
TOP-001-1	R6.	Compliant
TOP-001-1	R7.	Compliant
TOP-001-1	R8.	Compliant
TOP-002-2	R1.	Compliant
TOP-002-2	R2.	N/A
TOP-002-2	R3.	Compliant
TOP-002-2	R4.	Compliant
TOP-002-2	R5.	N/A
TOP-002-2	R6.	N/A
TOP-002-2	R7.	N/A
TOP-002-2	R8.	N/A
TOP-002-2	R9.	Compliant
TOP-002-2	R10.	N/A
TOP-002-2	R11.	Compliant
TOP-002-2	R12.	N/A
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.	N/A
TOP-003-0	R2.	N/A
TOP-003-0	R3.	N/A
TOP-003-0	R4.	N/A
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.	N/A
TOP-005-1	R1.	N/A
TOP-005-1	R2.	N/A
TOP-005-1	R3.	N/A
TOP-005-1	R4.	N/A
TOP-006-1	R1.	N/A
TOP-006-1	R2.	Compliant
TOP-006-1	R3.	N/A
TOP-006-1	R4.	N/A
TOP-006-1	R5.	N/A
TOP-006-1	R6.	Compliant
TOP-006-1	R7.	Compliant

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Reliability Standard	Requirement	Finding
TOP-007-0	R1.	Compliant
TOP-007-0	R2.	Compliant
TOP-007-0	R3.	Compliant
TOP-007-0	R4.	N/A
TOP-008-1	R1.	Compliant
TOP-008-1	R2.	Compliant
TOP-008-1	R3.	Compliant
TOP-008-1	R4.	N/A
TPL-001-0	R1.	Compliant
TPL-001-0	R2.	N/A
TPL-001-0	R3.	N/A
TPL-002-0	R1.	Compliant
TPL-002-0	R2.	N/A
TPL-002-0	R3.	N/A
TPL-003-0	R1.	Compliant
TPL-003-0	R2.	N/A
TPL-003-0	R3.	N/A
TPL-004-0	R1.	N/A
TPL-004-0	R2.	N/A
VAR-001-1	R1.	Compliant
VAR-001-1	R2.	Compliant
VAR-001-1	R3.	N/A
VAR-001-1	R4.	N/A
VAR-001-1	R5.	N/A
VAR-001-1	R6.	N/A
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.	N/A
VAR-002-1	R2.	N/A
VAR-002-1	R3.	N/A
VAR-002-1	R4.	N/A
VAR-002-1	R5.	N/A

Compliance Culture

The audit team assessed CWLP's Internal Compliance Program in conjunction with the audit. Evidence reviewed in assessing the program included: CWLP's Compliance Pre-Audit Survey, Compliance Committee Mission Statement.doc (program document), compliance staff organizational charts, interviews with CWLP staff, and observation of staff responses in preparation for and during the audit.

Four factors that characterize a vigorous and effective compliance program are: active engagement and leadership by a company's senior management; preventive measures appropriate to the individual circumstances of the company; promptly detecting, stopping, and reporting a violation; and, ultimately fixing the problem and working to avoid future possible violations.

SERC recognizes that there isn't one standard formula for an effective compliance program, and that there will be variations in each company's program and culture based on countless factors, including the size and age of the company, as well as the nature and extent of its business. Ultimately what matters are the results, and whether the compliance program worked as it should.

The audit team determined that CWLP's Internal Compliance Program documents and their staff demonstrated a culture of compliance indicative to an effective compliance program.