



Compliance Audit Report Public Version

**ExxonMobil Oil Corporation - Beaumont
Refinery
NCR01239
July 22-23, 2009**

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

September 12, 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.

ExxonMobil Oil Corporation - Beaumont Refinery (ExxonMobil) was audited on July 22–23, 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 ExxonMobil's registered functions. ExxonMobil is currently registered with SERC Reliability Corporation (SERC) as a Generator Operator (GOP) and Generator Owner (GO). Fourteen standards were selected and identified to ExxonMobil as subject to review during this audit. The audit focused on documents and other evidence provided to SERC by the staff of ExxonMobil, 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.

ExxonMobil 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 ExxonMobil as subject to this audit. ExxonMobil staff responded by providing evidence in the form of reports, procedures, studies, and other documents. ExxonMobil 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 ExxonMobil was judged to be compliant. Likewise, if any of the requirements or sub-requirements were not fully met, then ExxonMobil was judged to have a possible violation of the standard. A score of 100% is required for compliance.

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

The audit team determined that ExxonMobil does not own or operate Special Protection Systems and has no 200 kV or above facilities as per the SERC PRC-003 and PRC-004 supplements; therefore, two of the fourteen standards were not applicable. These standards are PRC -017 and PRC-004.

ExxonMobil recently closed mitigation plans regarding NERC Reliability Standard IRO-004-1, ; TOP-002, ; and PRC-005 . The audit team reviewed the mitigation plan completion documentation to ensure compliance.

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:

- Independently review ExxonMobil's compliance with the requirements of the reliability standards that are applicable to ExxonMobil based on the ExxonMobil's 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 ExxonMobil's compliance culture.

Scope

The scope of the audit of ExxonMobil included all monitored standards that are in the NERC 2009 CMEP. Based on the confirmed registration of ExxonMobil, the 14 reliability standards previously identified were the focus of the compliance audit. Of these 14 standards, PRC-004-1 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 or spot check 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 ExxonMobil in advance of the audit. Work history and conflict of interest forms submitted by each audit team member were provided to ExxonMobil 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. ExxonMobil 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. ExxonMobil accepted the audit team member participants with no objections.

On-site Audit

ExxonMobil was contacted by letter on January 24, 2009 by SERC staff. The letter provided ExxonMobil 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 ExxonMobil both verify their currently registered functions and complete and return an attached Pre-Audit Survey within 30 days.

On April 24, 2009, SERC staff forwarded an Audit Detail Letter to ExxonMobil, again confirming the scheduled audit dates and confirming ExxonMobil's registered functions within SERC. The Audit Detail Letter also provided ExxonMobil with notice of the Standards in Audit Scope, Proposed Audit Schedule, Audit Team Roster (with industry affiliations), and requested that ExxonMobil Subject Matter Experts (SMEs) responsible for and knowledgeable of compliance

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

submittals be available for interview during the audit. In addition to the Audit Detail Letter, ExxonMobil 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 Questionnaires/Reliability Standard Auditor Worksheets (QRSAWs) 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.

Methodology

A team of auditors were identified and conducted the audit of ExxonMobil. The standards were grouped and scheduled for review to make the most efficient use of ExxonMobil staff's time. The audit team moderator (ATL or designee) initiated dialogue on each standard requirement and requested compliance evidence. This evidence and ExxonMobil's staff response was documented. ExxonMobil staff was requested to show valid evidence of meeting each applicable requirement and sub-requirement contained in the 14 standards that had been previously identified by SERC to ExxonMobil as subject to this audit. ExxonMobil staff responded by providing evidence in the form of reports, procedures, studies, and other documents. ExxonMobil 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 QRSAWs 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 ExxonMobil 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 ExxonMobil did not provide sufficient evidence to support a finding of compliance, then a possible violation was identified by the team and ExxonMobil staff was informed.

Audit Overview

The audit team arrived at the ExxonMobil offices at 2:45 PM, July 22, 2009. At 3:35 PM, July 22, 2009 the Audit Team Lead (ATL) began the session with an opening presentation. He reviewed the NERC compliance plan for 2009 in general, and how it applied to ExxonMobil specifically. The ATL introduced and reviewed the standards to be covered in the audit, and addressed both the expectations of ExxonMobil 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. ExxonMobil staff made a brief presentation describing ExxonMobil's corporate structure and compliance program. The staff of ExxonMobil was introduced, and general housekeeping matters explained. The staff of ExxonMobil was excused and the audit team reviewed team assignments and a general overview for preparation of the audit activities. The audit team left the ExxonMobil office at 4:35 PM, July 22, 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 ExxonMobil office at 7:45 AM, July 23, 2009. The audit team initially reviewed the registration status of ExxonMobil with entity staff to verify applicability of each standard. Each standard's audit began with a recitation of each requirement. ExxonMobil 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 ExxonMobil 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 QRS AW.

The review of all applicable standards was completed at 2:04 PM, July 23, 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 QRS AW.

Exit Briefing

The ATL presented an exit briefing to the assembled audit team and entity staff at 4:00 PM, July 23, 2009. This was followed by an informal response and questions from the ExxonMobil staff. The exit briefing summarized the team's preliminary conclusions, including any items of potential noncompliance or possible violation 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 ExxonMobil staff, along with requesting that they fill out formal feedback forms for submission to NERC and SERC.

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

The audit team left the ExxonMobil meeting room at 4:55 PM, on July 23, 2009.

Company Profile

Exxon Mobil Corporation is a global, integrated petrochemical energy corporation, with upstream, downstream/chemicals, and marketing divisions with approximately 80,000 employees. ExxonMobil Oil Corporation's Beaumont Refinery is a wholly-owned subsidiary of Mobil Oil Corporation, which is a wholly-owned subsidiary of Exxon Mobil Corporation. The refinery has been in operation since 1903 and has a current crude capacity of 359,100 barrels per day and produces an average of approximately 150,000 barrels per day of motor gasoline. The refinery currently employs approximately 1,100 employees and between 700 and 1,200 contractors. The refinery is co-located and integrated with an ExxonMobil chemical complex.

Construction of the ExxonMobil Beaumont Refinery's NERC-registered steam and electricity generating CoGen plant began in 2002. The plant became operational between December 2004 and June 2005. The generating plant consists of three independent GE Frame 7FA gas turbine generator trains that each has nameplate ratings of 163.7 MW. Each gas turbine is connected to the Bulk Electrical System at 138 kV via dedicated generator step-up transformers. Generated electricity is used to supplement the refinery's power needs and approximately 50 - 200 MW of excess power is sold to Entergy and other customers.

Audit Specifics

The compliance audit was conducted on July 22-23, 2009 at the ExxonMobil office in Beaumont, Texas.

Audit Team

Audit Team Role	Title	Company
Lead	Senior Compliance Auditor	SERC
Member	Senior Compliance Auditor	SERC
Member	Executive Assistant	SERC

ExxonMobil Audit Participants Titles and Organizations

Title	ExxonMobil Organization
Beaumont Site Security Coordinator	ExxonMobil Oil Corporation – Beaumont Refinery
Utilities Section Supervisor	Exxon Mobil Oil Corporation –
Electric Power Engineering Specialist	ExxonMobil Research & Engineering - AAEO
Power & Utilities Sales Coordinator	ExxonMobil Oil Corporation – Beaumont Refinery
E&I Maintenance SLS	ExxonMobil Oil Corporation – Beaumont Refinery
Electrical Engineering Specialist	ExxonMobil Oil Corporation – Beaumont Refinery
BAES E/I/A Engineering Supervisor	ExxonMobil Oil Corporation – Beaumont Refinery
Operating Services DH	ExxonMobil Oil Corporation – Beaumont Refinery
Electrical Engineering Specialist	ExxonMobil Oil Corporation – Beaumont Refinery
Incoming Mech Manager	ExxonMobil Oil Corporation – Beaumont Refinery
Mechanical Manager	ExxonMobil Oil Corporation – Beaumont Refinery
Electrical Engr Section Supv	ExxonMobil Oil Corporation – Beaumont Refinery
Power Plant Section Supv	ExxonMobil Oil Corporation – Beaumont Refinery
Engineering Services Manager	ExxonMobil Oil Corporation – Beaumont Refinery
Utilities Coordinator	ExxonMobil Oil Corporation – Beaumont Refinery
Refinery Manager	ExxonMobil Oil Corporation – Beaumont Refinery

AUDIT RESULTS

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

The audit team reviewed documents provided by ExxonMobil-Beaumont's prior to the audit, as requested in the Documentation and Evidence Requirements section of ExxonMobil-Beaumont's Compliance Audit Certification Letter. Review of these documents and of currently open or recently closed mitigation plans, pre-audit, helped to establish the audit team's focus during the audit.

The audit team reviewed the evidence provided by ExxonMobil-Beaumont's to substantiate compliance with each standard requirement. The team requested clarification and/or additional supporting and corroborating evidence, as required, to obtain sufficient and appropriate evidence to support a determination of compliance.

In instances where the evidence provided by ExxonMobil-Beaumont's represented multiple facilities and/or large quantities of equipment, the audit team haphazardly selected evidence samples, from the different facilities and/or equipment, to facilitate a consensus agreement of the team that ExxonMobil-Beaumont's is, in the team's professional judgment, satisfactorily meeting the requirements of the standard or is in possible violation of the requirement.

The audit team reviewed ExxonMobil-Beaumont's status and progress of mitigation of all open and/or recently closed mitigation plans in conjunction with the review of each standard applicable to ExxonMobil-Beaumont's currently registered functions.

If the audit team determined that the evidence provided by ExxonMobil-Beaumont's was insufficient or inappropriate to substantiate a determination of compliance, the team immediately informed ExxonMobil-Beaumont's Subject Matter Experts (SME) of this fact. Additionally, the Audit Team Lead, through coordination with ExxonMobil-Beaumont's audit coordinator, ensured that ExxonMobil-Beaumont's management was made aware of the potential for a finding of a possible violation in each instance, and of the basis for the team's determination.

The Audit Team Lead clearly identified the team's findings of compliance and basis for their findings, areas of concern, and available remedies in an exit presentation to ExxonMobil-Beaumont's management on completion of the audit.

The audit team documented their review and determination of compliance of each standard requirement on QRSAs. ExxonMobil-Beaumont's policies, procedures, screenshots, operator logs, audio clips, correspondence and other evidence presented, as well as auditor comments and determinations of compliance documented on the QRSAs were used in formulating this report.

The audit team found ExxonMobil-Beaumont's to be in compliance with all of the NERC Reliability Standards in the audit scope.

Prior to being forwarded to SERC's Manager of Compliance Audits for review and approval as SERC's Final Confidential Non-Public Audit Report of ExxonMobil-Beaumont's, the content and accuracy of this report:

- o Is reviewed and commented on by all audit team members
- o Is reviewed by ExxonMobil-Beaumont's management for correction and comment, and
- o Is reviewed and approved by the Audit Team Lead.

Upon final disposition of any possible violations determined by the audit team, if any, and redaction of appropriate information contained herein, this report will be reviewed and approved by SERC's Vice President and Director of Compliance before being issued as SERC's Final Public Audit Report of ExxonMobil-Beaumont's.

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.	N/A
BAL-002-0	R2.	N/A
BAL-002-0	R3.	N/A
BAL-002-0	R4.	N/A
BAL-002-0	R5.	N/A
BAL-002-0	R6.	N/A

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

Reliability Standard	Requirement	Finding
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.	N/A
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.	N/A
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
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.	N/A
COM-001-1	R2.	N/A
COM-001-1	R3.	N/A
COM-001-1	R4.	N/A

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Reliability Standard	Requirement	Finding
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.	N/A
EOP-001-0	R2.	N/A
EOP-001-0	R3.	N/A
EOP-001-0	R4.	N/A
EOP-001-0	R5.	N/A
EOP-001-0	R6.	N/A
EOP-001-0	R7.	N/A
EOP-002-2	R1.	N/A
EOP-002-2	R2.	N/A
EOP-002-2	R3.	N/A
EOP-002-2	R4.	N/A
EOP-002-2	R5.	N/A
EOP-002-2	R6.	N/A
EOP-002-2	R7.	N/A
EOP-002-2	R8.	N/A
EOP-002-2	R9.	N/A
EOP-003-1	R1.	N/A
EOP-003-1	R2.	N/A
EOP-003-1	R3.	N/A
EOP-003-1	R4.	N/A
EOP-003-1	R5.	N/A
EOP-003-1	R6.	N/A
EOP-003-1	R7.	N/A
EOP-003-1	R8.	N/A
EOP-004-1	R1.	N/A
EOP-004-1	R2.	N/A
EOP-004-1	R3.	N/A
EOP-004-1	R4.	N/A
EOP-004-1	R5.	N/A
EOP-005-1	R1.	N/A
EOP-005-1	R2.	N/A
EOP-005-1	R3.	N/A
EOP-005-1	R4.	N/A
EOP-005-1	R5.	N/A
EOP-005-1	R6.	N/A
EOP-005-1	R7.	N/A
EOP-005-1	R8.	N/A
EOP-005-1	R9.	N/A

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Reliability Standard	Requirement	Finding
EOP-005-1	R10.	N/A
EOP-005-1	R11.	N/A
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.	N/A
EOP-009-0	R1.	N/A
EOP-009-0	R2.	N/A
FAC-001-0	R1.	N/A
FAC-001-0	R2.	N/A
FAC-001-0	R3.	N/A
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
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.	N/A

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Reliability Standard	Requirement	Finding
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
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.	N/A
IRO-004-1	R4.	Compliant
IRO-004-1	R5.	N/A
IRO-004-1	R6.	N/A
IRO-004-1	R7.	N/A
IRO-005-2	R1.	N/A

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Reliability Standard	Requirement	Finding
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.	N/A
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.	N/A
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
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

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Reliability Standard	Requirement	Finding
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.	N/A
PER-002-0	R1.	N/A
PER-002-0	R2.	N/A
PER-002-0	R3.	N/A
PER-002-0	R4.	N/A
PER-003-0	R1.	N/A
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
PRC-001-1	R4.	N/A
PRC-001-1	R5.	Compliant
PRC-001-1	R6.	N/A
PRC-004-1	R1.	N/A
PRC-004-1	R2.	N/A
PRC-004-1	R3.	N/A
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

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

Reliability Standard	Requirement	Finding
PRC-008-0	R1.	N/A
PRC-008-0	R2.	N/A
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.	N/A
TOP-001-1	R2.	N/A
TOP-001-1	R3.	Compliant
TOP-001-1	R4.	N/A
TOP-001-1	R5.	N/A
TOP-001-1	R6.	Compliant
TOP-001-1	R7.	Compliant
TOP-001-1	R8.	N/A
TOP-002-2	R1.	N/A
TOP-002-2	R2.	N/A
TOP-002-2	R3.	Compliant
TOP-002-2	R4.	N/A
TOP-002-2	R5.	N/A
TOP-002-2	R6.	N/A
TOP-002-2	R7.	N/A
TOP-002-2	R8.	N/A

Confidential Information (including Privileged and
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Reliability Standard	Requirement	Finding
TOP-002-2	R9.	N/A
TOP-002-2	R10.	N/A
TOP-002-2	R11.	N/A
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.	N/A
TOP-002-2	R17.	N/A
TOP-002-2	R18.	Compliant
TOP-002-2	R19.	N/A
TOP-003-0	R1.	Compliant
TOP-003-0	R2.	Compliant
TOP-003-0	R3.	Compliant
TOP-003-0	R4.	N/A
TOP-004-1	R1.	N/A
TOP-004-1	R2.	N/A
TOP-004-1	R3.	N/A
TOP-004-1	R4.	N/A
TOP-004-1	R5.	N/A
TOP-004-1	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.	N/A
TOP-006-1	R3.	N/A
TOP-006-1	R4.	N/A
TOP-006-1	R5.	N/A
TOP-006-1	R6.	N/A
TOP-006-1	R7.	N/A
TOP-007-0	R1.	N/A
TOP-007-0	R2.	N/A
TOP-007-0	R3.	N/A
TOP-007-0	R4.	N/A
TOP-008-1	R1.	N/A
TOP-008-1	R2.	N/A
TOP-008-1	R3.	N/A
TOP-008-1	R4.	N/A
TPL-001-0	R1.	N/A
TPL-001-0	R2.	N/A
TPL-001-0	R3.	N/A

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Critical Energy Infrastructure Information) – Has Been Removed

Reliability Standard	Requirement	Finding
TPL-002-0	R1.	N/A
TPL-002-0	R2.	N/A
TPL-002-0	R3.	N/A
TPL-003-0	R1.	N/A
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.	N/A
VAR-001-1	R2.	N/A
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.	N/A
VAR-001-1	R8.	N/A
VAR-001-1	R9.	N/A
VAR-001-1	R10.	N/A
VAR-001-1	R11.	N/A
VAR-001-1	R12.	N/A
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 ExxonMobil - Beaumont Internal Compliance Program in conjunction with the audit. Evidence reviewed in assessing the program included: ExxonMobil - Beaumont Compliance Pre-Audit Survey, the Compliance Culture PowerPoint provided, compliance staff organizational charts, interviews with ExxonMobil - Beaumont 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 ExxonMobil - Beaumont Internal Compliance Program documents and their staff's demonstrated compliance culture indicate a very effective compliance program.