



# **Compliance Audit Report Public Version**

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

**Greenwood Commissioners  
of Public Works  
NCR01250  
October 5-7, 2009**

**March 1, 2010**

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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.

SERC Reliability Corporation conducted an unscheduled audit of the Greenwood Commissioners of Public Works (Greenwood CPW) on October 5-7, 2009 for compliance with the requirements contained in the currently mandatory and enforceable NERC Reliability Standards that are applicable to Greenwood CPW's registered functions. Greenwood CPW is registered with SERC Reliability Corporation (SERC) as a Distribution Provider (DP) and a Load-Serving Entity (LSE). Twenty-seven standards were selected and identified to Greenwood CPW as subject to review during this audit. The audit focused on documents and other evidence provided to SERC by the staff of Greenwood CPW, 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.

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

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

The audit team determined that Greenwood CPW does not own or operate Transmission and Generation Protection Systems, Under Voltage Load Shedding, Under Frequency Load Shedding, or Special Protection Systems, and therefore 12 of the 27 standards identified to Greenwood CPW as being in scope for the audit were not applicable. These standards are PRC-004-1, PRC-005-1, PRC-007-0, PRC-008-0, PRC-009-0, PRC-010-0, PRC-011-0, PRC-015-0, PRC-016-0, PRC-017-0, PRC-021-1, and PRC-022-1.

Greenwood CPW had certified closure of an open mitigation plan regarding NERC Reliability Standard CIP-001-1 just before the audit. The audit team reviewed Greenwood CPW's evidence of closure of this mitigation plan on behalf of SERC Compliance Enforcement. SERC Compliance Enforcement will notify Greenwood CPW of their determination of satisfactory completion of the plan.

The link to the Greenwood Commissioners of Public Works NOP can be viewed [here](#).

## 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.<sup>1</sup> This unscheduled audit objectives were to:

- Independently review and validate Greenwood CPW's compliance with the requirements of NERC Reliability Standards that are applicable to Greenwood CPW based on the Greenwood CPW's registered functions.
- 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 Greenwood CPW's compliance culture.

### **Scope**

The scope of Greenwood CPW's unscheduled audit included all requirements of all NERC Reliability Standards that were applicable to Greenwood CPW's registered functions. Based on the confirmed registration of Greenwood CPW, the 27 reliability standards previously identified were the focus of the compliance audit. Of these, 12 standards; PRC-004-1, PRC-005-1, PRC-007-0, PRC-008-0, PRC-009-0, PRC-010-0, PRC-011-0, PRC-015-0, PRC-016-0, PRC-017-0, PRC-021-1, and PRC-022-1 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 regional entity staff were provided to Greenwood CPW in advance of the audit. Work history and conflict of interest forms submitted by each audit team member were provided to Greenwood CPW upon request. Greenwood CPW was given an opportunity to object to any 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. Greenwood CPW accepted the audit team member participants with no objections.

### **On-site Audit**

Greenwood CPW was contacted by letter on September 4, 2009 by SERC staff. The letter was the initial notification to Greenwood CPW that they had been selected for an unscheduled audit to be conducted on October 5-9, 2009. SERC staff requested that Greenwood CPW both verify their currently registered functions and complete and return an attached Pre-Audit Survey within 30 days.

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<sup>1</sup> North American Electric Reliability Corporation CMEP, paragraph 3.1, Compliance Audits

Also on September 4, 2009, SERC staff forwarded an Audit Detail Letter to Greenwood CPW. The Audit Detail Letter provided Greenwood CPW with notice of the Standards in Audit Scope, Proposed Audit Schedule, Audit Team Roster (with industry affiliations), and requested that Greenwood CPW Subject Matter Experts responsible for and knowledgeable of compliance submittals be available for interview during the audit. In addition to the Audit Detail Letter, Greenwood CPW was also provided with a Non-Disclosure Agreement Signature Verification Report for audit team members, a list of Documentation and Evidence Requirements, and Questionnaire and 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 was identified and conducted the audit of Greenwood CPW. The standards were grouped and scheduled for review to make the most efficient use of Greenwood CPW staff's time. The Audit Team Leader (ATL) initiated dialogue on each standard requirement and requested evidence of compliance. Greenwood CPW's staff was requested to show valid evidence of meeting each applicable requirement and sub-requirement contained in the 27 standards that had been previously identified by SERC to Greenwood CPW as subject to this audit. Greenwood CPW's staff responded by providing evidence in the form of reports, procedures, studies, and other documents. Greenwood CPW's staff would then cite specific portions of the evidence that demonstrated compliance.

This evidence and citations were documented by the audit team scribe on the QRSAWs, and were 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 Greenwood CPW staff until it was determined whether each requirement was met by the cited evidence or other evidence offered.

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

### ***Audit Overview***

The audit team arrived at the Greenwood CPW offices at 2:55 PM, October 5, 2009. At 3:35 PM the same day, the ATL began the session with an opening presentation. He reviewed the NERC compliance plan for 2009 in general, and how an unscheduled audit applied to Greenwood CPW specifically. The ATL introduced and reviewed the standards to be covered in the audit, and addressed both the expectations of Greenwood CPW 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.

Greenwood CPW staff made a brief presentation describing Greenwood CPW's corporate structure and compliance program. The staff of Greenwood CPW was introduced, and general housekeeping matters explained. The staff of Greenwood CPW was excused and the audit team discussed a general overview for preparation of the audit activities. The audit team left Greenwood CPW's office at 4:30 PM, October 5, 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 Greenwood CPW office at 7:44 AM, October 6, 2009. The audit team initially reviewed the registration status of Greenwood CPW with entity staff to verify applicability of each standard. Each standard's audit began with a recitation of each requirement. Greenwood CPW 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 Greenwood CPW staff before proceeding to the next requirement. 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 9:09 AM, October 7, 2009, at which time 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 Greenwood CPW staff at 9:49 AM, October 7, 2009. This was followed by an informal response and questions from the Greenwood CPW 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 Greenwood CPW staff, along with requesting that they fill out formal feedback forms for submission to NERC and SERC. The ATL thanked Greenwood CPW staff for their cooperation and support of the audit process. Greenwood CPW staff expressed their appreciation of the professional manner in which the audit was conducted. The audit team left the Greenwood CPW meeting room at 10:02 AM on October 7, 2009.

### **Company Profile**

Founded in 1896, Greenwood Commissioners of Public Works is an award-winning municipality that provides clean water, efficient burning natural gas, and dependable electric service to the businesses and citizens of Greenwood, SC. Greenwood CPW's distribution system operates primarily within the corporate limits of the City of Greenwood, distributing power to more than 10,000 customers. Greenwood CPW has 6 sub-stations (2 at 100 kV), 21 circuits (6 at 100 kV), and approximately 180 miles of line.

### **Audit Specifics**

The compliance audit was conducted on October 5-7, 2009 at the Greenwood CPW office in Greenwood, SC.

### **Audit Team**

| <b>Audit Team Role</b> | <b>Title</b>              | <b>Company</b> |
|------------------------|---------------------------|----------------|
| Lead                   | Senior Compliance Auditor | SERC           |
| Member                 | Compliance Auditor        | SERC           |

## GPW Audit Participants Title and Organization

| Title                        | Organization                    |
|------------------------------|---------------------------------|
| General Manager              | Greenwood CPW                   |
| Assistant General Manager    | Greenwood CPW                   |
| Director, Electric Utilities | Greenwood CPW                   |
| Consultant                   | Abidance Consulting Corporation |

## AUDIT RESULTS

The audit team reviewed documents provided by Greenwood CPW prior to the audit, as requested in the Documentation and Evidence Requirements section of Greenwood CPW's Compliance Audit Certification Letter. Pre-audit review of these documents, as well as one currently open mitigation plan, helped to establish the audit team's focus during the audit.

The audit team reviewed the evidence provided by Greenwood CPW 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.

At times, the audit team haphazardly selected evidence samples, from Greenwood CPW's different facilities, equipment, and/or dates of evidence. This was done to facilitate a consensus agreement of the team whether Greenwood CPW 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 Greenwood CPW's evidence of completion of a mitigation plan for a self-reported possible violation of CIP-001-1, which had recently been certified by Greenwood CPW as having been completed, in conjunction with the review of that standard. The results of the audit team's review of the evidence were provided to SERC Compliance Enforcement for review and notification to Greenwood CPW of SERC's determination of satisfactory completion of the mitigation plan.

If the audit team determined that the evidence provided by Greenwood CPW was insufficient or inappropriate to substantiate a determination of compliance, the team immediately informed Greenwood CPW's Subject Matter Expert of this fact. Additionally, the Audit Team Leader, through coordination with Greenwood CPW's audit coordinator, ensured that Greenwood CPW'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 Leader clearly identified the team's findings of compliance and basis for their findings, areas of concern, and available remedies in an exit presentation to Greenwood CPW's management on completion of the audit.

The audit team documented their review and determination of compliance of each standard requirement on Questionnaire/Reliability Standard Auditor Worksheets. Greenwood CPW'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 determined Greenwood CPW 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, or his designee, for review and approval as SERC’s Final Confidential Non-Public Audit Report of Greenwood CPW, the content and accuracy of this report:

- Is reviewed and commented on by all audit team members
- Is reviewed by Greenwood CPW’s management for correction and comment, and
- 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 Manager, Compliance Programs before being issued as SERC’s Final Public Audit Report of Greenwood CPW.

**Findings**

| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| 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            |
| 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.                | Compliant      |
| 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            |

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| <b>Reliability Standard</b>    | <b>Requirement</b> | <b>Finding</b>       |
|--------------------------------|--------------------|----------------------|
| 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.                | Open Mitigation Plan |
| CIP-001-1                      | R2.                | Open Mitigation Plan |
| CIP-001-1                      | R3.                | Open Mitigation Plan |
| CIP-001-1                      | R4.                | Open Mitigation Plan |
| CIP-002-1 through<br>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                  |
| COM-001-1                      | R5.                | N/A                  |
| COM-001-1                      | R6.                | N/A                  |
| COM-002-2                      | R1.                | N/A                  |
| 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                  |

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| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| EOP-002-2                   | R7.                | N/A            |
| EOP-002-2                   | R8.                | N/A            |
| EOP-002-2                   | R9.                | Compliant      |
| 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.                | Compliant      |
| EOP-004-1                   | R3.                | Compliant      |
| 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            |
| 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.                | Compliant      |
| FAC-002-0                   | R2.                | Compliant      |
| FAC-003-1                   | R1.                | N/A            |

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| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| FAC-003-1                   | R2.                | N/A            |
| FAC-003-1                   | R3.                | N/A            |
| FAC-003-1                   | R4.                | N/A            |
| FAC-008-1                   | R1.                | N/A            |
| FAC-008-1                   | R2.                | N/A            |
| FAC-008-1                   | R3.                | N/A            |
| FAC-009-1                   | R1.                | N/A            |
| FAC-009-1                   | R2.                | N/A            |
| 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            |
| 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            |

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| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| 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-005-1                   | R1.                | N/A            |
| IRO-005-1                   | R2.                | N/A            |
| IRO-005-1                   | R3.                | N/A            |
| IRO-005-1                   | R4.                | N/A            |
| IRO-005-1                   | R5.                | N/A            |
| IRO-005-1                   | R6.                | N/A            |
| IRO-005-1                   | R7.                | N/A            |
| IRO-005-1                   | R8.                | N/A            |
| IRO-005-1                   | R9.                | N/A            |
| IRO-005-1                   | R10.               | N/A            |
| IRO-005-1                   | R11.               | N/A            |
| IRO-005-1                   | R12.               | N/A            |
| IRO-005-1                   | R13.               | Compliant      |
| IRO-005-1                   | R14.               | N/A            |
| IRO-005-1                   | R15.               | N/A            |
| IRO-005-1                   | R16.               | N/A            |
| IRO-005-1                   | R17.               | N/A            |
| IRO-006-3                   | R1.                | N/A            |

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| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| 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            |
| MOD-017-0                   | R1.                | Compliant      |
| MOD-018-0                   | R1.                | Compliant      |
| MOD-018-0                   | R2.                | Compliant      |
| MOD-019-0                   | R1.                | Compliant      |
| MOD-020-0                   | R1.                | Compliant      |
| MOD-021-0                   | R1.                | Compliant      |
| MOD-021-0                   | R2.                | Compliant      |
| MOD-021-0                   | R3.                | Compliant      |
| 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            |

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| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| 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.                | N/A            |
| PRC-001-1                   | R2.                | N/A            |
| PRC-001-1                   | R3.                | N/A            |
| PRC-001-1                   | R4.                | N/A            |
| PRC-001-1                   | R5.                | N/A            |
| 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.                | N/A            |
| PRC-005-1                   | R2.                | N/A            |
| PRC-007-0                   | R1.                | N/A            |
| PRC-007-0                   | R2.                | N/A            |
| PRC-007-0                   | R3.                | N/A            |
| 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            |

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| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| 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.                | N/A            |
| TOP-001-1                   | R4.                | Compliant      |
| TOP-001-1                   | R5.                | N/A            |
| TOP-001-1                   | R6.                | N/A            |
| TOP-001-1                   | R7.                | N/A            |
| 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            |
| 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.               | N/A            |
| TOP-002-2                   | R14.               | N/A            |
| TOP-002-2                   | R15.               | N/A            |
| 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.                | N/A            |
| TOP-003-0                   | R2.                | N/A            |
| TOP-003-0                   | R3.                | N/A            |
| TOP-003-0                   | R4.                | N/A            |
| TOP-004-1                   | R1.                | N/A            |
| TOP-004-1                   | R2.                | N/A            |

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| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| 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            |
| 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            |

| <b>Reliability Standard</b> | <b>Requirement</b> | <b>Finding</b> |
|-----------------------------|--------------------|----------------|
| 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 Greenwood CPW's Internal Compliance Program in conjunction with the audit. Evidence reviewed in assessing the program included: Greenwood CPW's Compliance Pre-Audit Survey, Greenwood CPW's organizational charts, interviews with Greenwood CPW 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 Greenwood CPW's Internal Compliance Program documents and their staff's demonstrated compliance culture indicate a relatively effective compliance program.