



Compliance Audit Report Public Version

**Yuma Cogeneration Associates
(YUCG)
NCR05481
June 16, 2009**

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

July 06, 2009

Audit Overview

The WECC Compliance Department conducted an off-site compliance audit of the Yuma Cogeneration Associates (YUCG) on June 16, 2009. The off-site audit was conducted at the WECC Compliance Department offices at 615 Arapeen Drive, Suite 210, Salt Lake City, Utah.

YUCG personnel were notified at the start of the off-site audit and kept informed as the audit progressed. YUCG did have personnel available during the audit and at the closing presentation.

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

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

YUCG has an Internal Compliance Program that was not reviewed in detail during the off-site audit.

The audit team used the Reliability Standard Audit Worksheets (QRSAWS) during the compliance review of each reliability standard. No violations were identified by the audit team during this audit.

Confidentiality and Conflict of Interest

Confidentiality agreements, executed by the WECC independent contractors (consultants) and code of conduct documentation for the NERC representative and WECC compliance staff, were available to YUCG in advance of the off-site audit, if requested. Work history and conflict of interest forms submitted by each audit team member were also provided. YUCG was given an opportunity to object to an audit team member on the basis of a possible conflict of interest or the existence of other circumstances that could interfere with that audit team member's impartial performance of duties. YUCG accepted the audit team member participants with no objections.

Off-site Audit

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

- Notice of Off-site Audit
- Compliance Monitoring Authority Letter
- Audit team bios
- Pre-audit Survey
- Certification sheet
- 2009 QRSAWS

YUCG was notified in the Pre-Audit letter that personnel (subject matter experts representing all the registered functions) would need to be available to answer questions (interviews) the audit team might have regarding the documentation.

YUCG was also informed that the off-site compliance audit would be conducted consistent with the following WECC Regional and NERC documents:

- WECC Compliance Monitoring and Enforcement Program
- NERC 2009 Reliability Standard Audit Worksheets (QRSAWS).

YUCG was asked to submit the completed Pre-audit Survey, and other requested documents back to the WECC Compliance Department.

A pre-audit conference call was held by WECC compliance staff with all the Registered Entities scheduled for an off-site audit.

Professional judgment was used by the audit team during the off-site audit. The audit team leader may have requested interviews with employees representing subject matter expertise regarding the registered functions being audited. These interviews in conjunction with the evidence, gave the audit team a factual basis for determining compliance with the NERC reliability standards.

Reference - Generally accepted government auditing standard 3.31 - Auditors must use professional judgment in planning and performing audits and attestation engagements and in reporting the results.

Reference - Generally accepted government auditing standard 3.39 - While this standard places responsibility on each auditor and audit organization to exercise professional judgment in planning and performing an audit or attestation engagement, it does not imply unlimited responsibility, nor does it imply infallibility on the part of either the individual auditor or the audit organization. Absolute assurance is not attainable because of the nature of evidence and the characteristics of fraud. Professional judgment does not mean eliminating all possible limitations or weaknesses associated with a specific audit, but rather identifying, considering, minimizing, mitigating, and explaining them.

Methodology

Methodology: the auditing of reliability standards and best practices to be followed by compliance auditors in carrying out their work. The methodology is objective, measurable, complete and relevant to the audit objectives. The auditor identifies potential sources of audit evidence and considers the amount and type of evidence needed given the risk and significance when defining the audit methodology.

Audit Specifics

Audit Team

Audit Team Role	Title	Company
Lead	Sr. Compliance Engineer	WECC
Member	Compliance Consultant	WECC

Registered Entity Audit Participants (Attending/Interviewed/Listening)

Title	Audited Organization
General Manager	YUCG
O&M Manager	YUCG
Compliance Manager	CalEnergy
Secondary NERC Contact	CalEnergy

Findings

The findings of the audit team at the off-site audit were presented to YUCG at the closing presentation. These findings are indicated in Table A below. The Finding column contains one of the following: Compliant, Possible Violation (PV), New Possible Violation (NPV), Not Applicable (NA), Not Audited, Outstanding Alleged Violation (OV), Retraction requested (Retract), Self-reported Violation (Self-Report), or other appropriate description.

Table A

Reliability Standard	Requirement	Finding
CIP-001-1	R1.	Compliant
	R2.	Compliant
	R3.	Compliant
	R4.	Compliant
COM-002-2	R1	Compliant
	R2.	Not Audited
FAC-008-1	R1.	Compliant
	R2.	Compliant
	R3.	Compliant
FAC-009-1	R1.	Compliant
	R2.	Compliant
IRO-001-1	R1.	Not Audited
	R2.	Not Applicable
	R3.	Not Applicable
	R4.	Not Audited
	R5.	Not Audited
	R6.	Not Audited
	R7.	Not Applicable
	R8.	Compliant
IRO-004-1	R1.	Not Applicable
	R2.	Not Applicable
	R3.	Not Applicable
	R4.	Compliant
	R5.	Not Applicable
	R6.	Not Applicable
IRO-005-1	R1.	Not Applicable
	R2.	Not Applicable
	R3.	Not Applicable
	R4.	Not Applicable
	R5.	Not Applicable
	R6.	Not Applicable

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Reliability Standard	Requirement	Finding
IRO-005-1	R7.	Not Applicable
	R8.	Not Applicable
	R9.	Not Applicable
	R10.	Not Applicable
	R11.	Not Applicable
	R12.	Not Applicable
	R13.	Compliant
	R14.	Not Audited
	R15.	Not Applicable
	R16.	Not Applicable
PRC-001-1	R17.	Not Applicable
	R1.	Compliant
	R2.	Compliant
	R3.	Not Audited
	R4.	Not Applicable
	R5.	Compliant
PRC-004-1	R6.	Not Applicable
	R1.	Not Applicable
	R2.	Compliant
PRC-005-1	R3.	Compliant
	R1.	Not Applicable
PRC-017-0	R2.	Not Applicable
	R1.	Not Audited
TOP-001-1	R2.	Not Applicable
	R3.	Compliant
	R4.	Not Applicable
	R5.	Not Applicable
	R6.	Compliant
	R7.	Compliant
	R8.	Not Applicable
	R1.	Not Applicable
TOP-002-2	R2.	Not Audited
	R3.	Compliant
	R4.	Not Applicable
	R5.	Not Audited
	R6.	Not Audited
	R7.	Not Audited
	R8.	Not Audited
	R9.	Not Applicable
	R10.	Not Audited

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Reliability Standard	Requirement	Finding
TOP-002-2	R11.	Not Applicable
	R12.	Not Audited
	R13.	Compliant
	R14.	Compliant
	R15.	Compliant
	R16.	Not Applicable
	R17.	Not Applicable
	R18.	Compliant
	R19.	Not Applicable
VAR-STD-002a-1	WR1.	Compliant
VAR-STD-002b-1	WR1	Compliant