City of Camden

South Carolina

Department of Public Works

7/22/2010

Mr. Mike Vastano, SERC Senior compliance Auditor
Mr. James Harrell, SERC Manager of Compliance Audits

Ref: SERC Compliance Audit Report

Gentlemen:

The following is in response to the findings in the audit report of the City of Camden's audit conducted June 23-24, 2010.

There is one correction to Camden's participants. The city manager's name is spelled "Bronson".

CIP-001-1 R1:

1. I concur that we do not have a definition of sabotage, nor examples of sabotage in the procedure.
2. Our note on page 6 instructs personnel not to broadcast in the open. It does not say to not use the phone. We use Nextel phones with a walkie-talkie feature. The intent is for personnel to call via phone mode to avoid broadcasting in the open, where the general public can overhear and possibly become alarmed.

CIP-001-1 R2:

1. I concur. The appropriate parties in the interconnection are listed in our procedure, but the procedure does not say to call them.

Note: We self-reported our lack of a sabotage plan when we joined the SERC registry, and SERC approved our mitigation plan.

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PRC-008-0 R1:

1. I concur this is a documentation only issue. The city has had a maintenance and testing program in place since prior to June 2007.

PRC-008-0 R2:

1. In reference to item 1a and 1b on Camden's UFLS relay, I agree that there is no specific mention of the UFLS equipment on the monthly inspection report. However, the report does mention the north and south bus, which the UFLS is a part of. These are inspected monthly. The monthly inspection report has been changed to specifically mention the UFLS equipment for future inspections.
2. Agree that we lack specific evidence that items 2a, 2c, 2d, and 2e were performed. However, good utility practice governs that when performing the download (2b), the breaker is tripped (2a), voltage sources are measured (2d), the power supply is checked (2c), and the recognition of the frequency is checked (2e). We have updated our record keeping to specifically record this data in the future.

I disagree with the audit team's view of our compliance culture. We readily joined the SERC registry in June 2007, and have attempted to interpret and comply with all applicable standards. In our opinion, all of the violations were not related to a lack of compliance, but related to a lack of specific evidence of compliance. Our mitigation of these issues will include documentation of evidence going forward.

Tom Couch

Tom Couch
Director