



**Compliance Audit Report
Public Version**

**Modern Electric Water Company ("MEWC")
NCR05243**

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

Date of Audit: December 14, 2010

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Executive Summary

The Western Electricity Coordinating Council (“WECC”) performed a compliance audit of Modern Electric Water Company (“MEWC”) NERC ID NCR05243 on December 14, 2010. At the time of the audit, MEWC was registered on the North American Electric Reliability Corporation (“NERC”) Compliance Registry for the following functions:

Distribution Provider (“DP”)

Load Serving Entity (“LSE”)

The audit team evaluated MEWC for compliance with seventy-nine (79) requirements in the NERC Compliance Monitoring and Enforcement Program 2010 Implementation Plan (“CMEP IP”). Additionally one (1) requirement in the WECC Regional Reliability Standards was audited. The audit team reviewed the NERC Reliability Standards for the period of June 18, 2007 – December 14, 2010. MEWC submitted information and documentation for the audit team’s evaluation of compliance with requirements. The audit team reviewed and evaluated all information provided by MEWC to assess compliance with standards applicable to MEWC at this time.

Based on the information and documentation provided by MEWC, the audit team found MEWC to be compliant with twelve (12) applicable requirements. The audit team determined that sixty-seven (67) Requirements were not applicable to MEWC. MEWC had zero (0) Outstanding Violations. The audit team also found MEWC compliant with one (1) requirement in the WECC Regional Reliability Standards audited. The audit team identified zero (0) New Possible Violations.

These audit results are further explained in the Audit Results Findings section of this report which includes detailed information of the audit team’s findings of applicability and compliance for the NERC Reliability Standards, and Applicable Regional Reliability Standards, within the scope of the compliance audit. Any Possible Violations will be processed through the NERC and WECC CMEP. There were zero (0) ongoing or recently completed mitigation plans and therefore none were reviewed by the audit team

The WECC audit team lead certifies that the audit team adhered to all applicable requirements of the NERC Rules of Procedure (“ROP”) and Compliance Monitoring and Enforcement Program (“CMEP”).*

* This statement replaces the Regional Entity Self-Certification process.

Audit Process

The compliance audit process steps are detailed in the WECC CMEP. The audit process generally conforms to the United States Government Accountability Office Government Auditing Standards (“GAGAS”) and to other generally accepted audit practices.

Objectives

A Registered Entity is subject to audit for compliance with all Reliability Standards applicable to its registered functions.

The audit objectives are to:

- Review compliance with the requirements of Reliability Standards that are applicable to MEWC, based on the functions that MEWC is registered to perform;
- Validate compliance with applicable Reliability Standards from the NERC 2010 CMEP Implementation Plan list of actively-monitored Reliability Standards and any applicable NERC Reliability Standards selected by WECC;
- Validate compliance with applicable Regional Standards from the WECC 2010 CMEP Implementation Plan list of actively monitored standards;
- Validate evidence of self-reported violations and previous self-certifications;
- Review the status of mitigation plans.

Scope

The scope of the compliance audit included the NERC Reliability Standards from the WECC CMEP 2010 Implementation Plan. In addition, this audit included any self-reports, self-certifications, outstanding mitigation plans or remedial action directives which have been completed or pending in the year of the compliance audit.

At the time of the audit, MEWC was registered for the functions Distribution Provider (“DP”) and Load Serving Entity (“LSE”). The audit team evaluated MEWC for compliance during the period of June 18, 2007 to December 14, 2010.

Confidentiality and Conflicts of Interest

Confidentiality and Conflict of Interest of the audit team are governed under the WECC Delegation Agreement with NERC, and Section 1500 of the NERC Rules of Procedure. MEWC was informed of WECC’s obligations and responsibilities under the Delegation Agreement and Rules of Procedure., The work history for each audit team member was provided to MEWC. MEWC had the opportunity to object to an audit team member’s

participation in the audit on the basis of a possible conflict of interest or because of other circumstances that could interfere with an audit team member's impartial performance of duties. MEWC had not submitted any objections by the stated fifteen day objection due date and accepted the audit team member participants without objection. There have been no denials of information or access limitations placed upon this audit team by MEWC.

Methodology

The audit team reviewed the information, data, and evidence submitted by MEWC and assessed compliance with requirements of the applicable Reliability Standards. Submittals of information and data were sent to WECC 35 days before the scheduled date of the entity review. Additional information relevant to the audit could be submitted until the conclusion of the audit exit briefing. After that date, only data or information which was relevant to the content of the report or its findings can be submitted upon agreement by the audit team lead.

The audit team requested and received additional information and sought clarification from subject matter experts during the audit.

The audit team reviewed documentation provided by MEWC. Data, information and evidence submitted in the form of policies, procedures, emails, logs, data sheets, etc., was validated, substantiated and cross checked for accuracy as appropriate. Requirements which required a sampling to be conducted were developed based upon the significance of the sampling to the reliability of the Bulk Electrical System ("BES").

Findings were based on the audit team's knowledge of the BES, the NERC Reliability Standards and team members' professional judgment. All findings were developed based on the consensus of the audit team.

Company Profile

Modern Electric Water Company is a nonprofit private utility which provides water service, and electricity to a service territory of approximately 5 square miles in Eastern Washington State. The company is connected to a single Transmission Operator at three locations. Energy is provided through contract from a third party.

Audit Participants

The following is a list of WECC Audit Team members and MEWC personnel who participated in the audit.

Audit Team Members

Audit Team Role	Title	Company
Audit Team Lead	Senior Compliance Engineer	WECC
Member	Consultant	WECC

MEWC Audit Participants

Title	Company
Operations Manager	MEWC
Systems Engineer	MEWC

Audit Results

The audit team evaluated MEWC for compliance with seventy-nine (79) requirements in the NERC Compliance Monitoring and Enforcement Program 2010 Implementation Plan (CMEP IP). Additionally one (1) requirement in the WECC Regional Reliability Standards was audited. The audit team reviewed the NERC Reliability Standards for the period of June 18, 2007 – December 14, 2010. MEWC submitted information and documentation for the audit team's evaluation of compliance with requirements. The audit team reviewed and evaluated all information provided by MEWC to assess compliance with standards applicable to MEWC at this time.

Based on the information and documentation provided by MEWC, the audit team found MEWC to be compliant with twelve (12) applicable requirements. The audit team determined that sixty-seven (67) requirements were not applicable to MEWC. MEWC had zero (0) Outstanding Violations. The audit team also found MEWC compliant with one (1) Requirement in the WECC Regional Reliability Standards audited. The audit team identified zero (0) New Possible Violations.

Findings

The following table details the findings for compliance for the scope identified for this audit.

No Finding: The audit team did not discover areas of non-compliance based on the evidence presented by the Registered Entity and reviewed by the audit team.

Not Applicable:

- The Requirement does not apply to the Registered Entity based on the entity's registered functions.

- The Requirement applies to the Registered Entity based on their functional registration but the entity does not possess the system(s) referenced in the Requirement.

Standard	Req.	Finding
CIP-001-1	R1.	No Finding
CIP-001-1	R2.	No Finding
CIP-001-1	R3.	No Finding
CIP-001-1	R4.	No Finding
EOP-002-2	R1.	Not Applicable
EOP-002-2	R2.	Not Applicable
EOP-002-2	R3.	Not Applicable
EOP-002-2	R4.	Not Applicable
EOP-002-2	R5.	Not Applicable
EOP-002-2	R6.	Not Applicable
EOP-002-2	R7.	Not Applicable
EOP-002-2	R8.	Not Applicable
EOP-002-2	R9.	No Finding
FAC-002-0	R1.	No Finding
IRO-001-1.1	R3.	Not Applicable
IRO-001-1.1	R7.	Not Applicable
IRO-001-1.1	R8.	No Finding
IRO-001-1.1	R9.	Not Applicable
IRO-004-1	R1.	Not Applicable
IRO-004-1	R2.	Not Applicable
IRO-004-1	R3.	Not Applicable
IRO-004-1	R4.	No Finding
IRO-004-1	R5.	Not Applicable
IRO-004-1	R6.	Not Applicable
IRO-004-1	R7.	Not Applicable
IRO-005-2	R1.	Not Applicable
IRO-005-2	R2.	Not Applicable
IRO-005-2	R3.	Not Applicable
IRO-005-2	R4.	Not Applicable
IRO-005-2	R5.	Not Applicable
IRO-005-2	R7.	Not Applicable
IRO-005-2	R8.	Not Applicable
IRO-005-2	R9.	Not Applicable

IRO-005-2	R10.	Not Applicable
IRO-005-2	R11.	Not Applicable
IRO-005-2	R12.	Not Applicable
IRO-005-2	R13.	No Finding
IRO-005-2	R14.	Not Applicable
IRO-005-2	R15.	Not Applicable
IRO-005-2	R16.	Not Applicable
IRO-005-2	R17.	Not Applicable
IRO-STD-006-0	WR1.	Not Applicable
NUC-001-2	R1.	Not Applicable
NUC-001-2	R2.	Not Applicable
NUC-001-2	R3.	Not Applicable
NUC-001-2	R4.	Not Applicable
NUC-001-2	R5.	Not Applicable
NUC-001-2	R6.	Not Applicable
NUC-001-2	R7.	Not Applicable
NUC-001-2	R8.	Not Applicable
NUC-001-2	R9.	Not Applicable
PRC-004-1	R1.	Not Applicable
PRC-004-1	R2.	Not Applicable
PRC-005-1	R1.	Not Applicable
PRC-005-1	R2.	Not Applicable
PRC-008-0	R1.	Not Applicable
PRC-008-0	R2.	Not Applicable
PRC-017-0	R1.	Not Applicable
TOP-001-1	R1.	Not Applicable
TOP-001-1	R2.	Not Applicable
TOP-001-1	R3.	Not Applicable
TOP-001-1	R4.	No Finding
TOP-001-1	R5.	Not Applicable
TOP-001-1	R6.	Not Applicable
TOP-001-1	R7.	Not Applicable
TOP-001-1	R8.	Not Applicable
TOP-002-2	R1.	Not Applicable
TOP-002-2	R2.	Not Applicable
TOP-002-2	R3.	No Finding
TOP-002-2	R4.	Not Applicable
TOP-002-2	R5.	Not Applicable
TOP-002-2	R6.	Not Applicable

TOP-002-2	R11.	Not Applicable
TOP-002-2	R13.	Not Applicable
TOP-002-2	R14.	Not Applicable
TOP-002-2	R15.	Not Applicable
TOP-002-2	R16.	Not Applicable
TOP-002-2	R17.	Not Applicable
TOP-002-2	R18.	No Finding
TOP-002-2	R19.	Not Applicable

Compliance Culture

MEWC's compliance culture was not reviewed by the audit team.

Exit Briefing

To conclude the audit, the audit team leader gave a presentation for MEWC's personnel summarizing the audit team's preliminary findings. The audit team leader also explained the next steps in the audit process and how WECC handles possible violations under the CMEP.

In Accordance with WECC CMEP Section 3.1.6:

WECC provided the draft of this audit report and an Entity Comment Form to MEWC on December 23, 2010 for review and comment. However, MEWC provided no comments.

Management Approval

This report was reviewed and approved by John McGhee, WECC Director of Compliance Audits and Investigations on January 12, 2011.