



Compliance Audit Report Public Version

**Brazos Electric Power Cooperative, Inc.
(NCR01186)**

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

Date of Audit: July 19-20, 2011

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Executive Summary

An on-site compliance audit of Brazos Electric Cooperative Inc Brazos (NCR01186) was conducted from July 19-20, 2011. At the time of the audit, Brazos was registered for the Distribution Provider (DP) and Load-Serving Entity (LSE) functions.

The audit team evaluated Brazos for compliance with 19 requirements in the 2011 NERC Compliance Monitoring and Enforcement Program (CMEP). The audit team assessed compliance with the NERC Reliability Standards for the period of June 18, 2007 through July 20, 2011. Brazos submitted information and documentation for the audit team's evaluation of compliance with requirements. The audit team reviewed and evaluated all information provided by Brazos to assess compliance with standards applicable to Brazos at this time.

Based on the information and documentation provided by Brazos, the audit team found Brazos to have no findings of non-compliance with 10 applicable requirements.

The audit team determined that nine requirements were not applicable to Brazos.

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 within the scope of the compliance audit. Any Possible Violations will be processed through the NERC and SERC Reliability Corporation (SERC) CMEP. There were no ongoing or recently completed mitigation plans and therefore none were reviewed by the audit team.

The SERC 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) with the following exceptions. The SERC audit team did not adhere to the NERC Compliance Checklist or NERC Compliance Auditor Manual regarding Reliability Coordinator Questionnaires due to the fact that SERC Reliability Corporation only sends Reliability Coordinator Questionnaires when auditing entities registered as Balancing Authorities (BA) and Transmission Operators (TOP).

Audit Process

The compliance audit process steps are detailed in the SERC CMEP. The SERC 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 an audit for compliance with all reliability standards applicable to the functions for which the registered entity is registered.¹ The audit objectives are to:

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

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- Review compliance with the requirements of reliability standards that are applicable to Brazos, based on the functions that Brazos is registered to perform;
- Validate compliance with applicable reliability standards from the NERC 2011 Implementation Plan list of actively monitored standards, and additional NERC Reliability Standards selected by SERC;
- Validate compliance with applicable regional standards from the SERC 2011 Implementation Plan list of actively monitored standards;
- Validate evidence of self-reported violations and previous self-certifications;
- Observe and document Brazos's compliance program and culture;
- Review the status of mitigation plans.

Scope

The scope of the compliance audit included the NERC Reliability Standards from the SERC 2011 Implementation Plan.

At the time of the audit, Brazos was registered for the DP and LSE functions. The audit team evaluated Brazos for compliance during the period of the lesser of: 1) date of registration to date of audit exit presentation; 2) date of last audit or spot check to date of audit exit presentation; or, 3) June 18, 2007 to date of audit exit presentation.

Confidentiality and Conflict of Interest

Confidentiality and Conflict of Interest of the audit team are governed under the SERC Delegation Agreement with NERC, and Section 1500 of the NERC Rules of Procedure. Brazos was informed of SERC's obligations and responsibilities under the agreement and procedures. The work history for each audit team member was provided to Brazos. Brazos was given an opportunity to object to an audit team member's participation on the basis of a possible conflict of interest or the existence of other circumstances that could interfere with an audit team member's impartial performance of duties. Brazos had not submitted any objections by the stated 15 day objection due date and accepted the audit team member participants without objection. There have been no denials of or access limitations placed upon this audit team by Brazos.

Methodology

The audit team reviewed the information, data, and evidence submitted by Brazos and assessed compliance with requirements of the applicable reliability standards. Submittal of information and data were sent to SERC 30 days before the scheduled date of the entity review. Additional information relevant to the audit could be submitted until the conclusion of the exit briefing.

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 Brazos. Data, information, and evidence submitted in the form of policies, procedures, emails, logs, studies, data sheets, etc. which were 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 Electric System (BES).

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

Company Profile

Brazos Electric Power Cooperative, Inc. is the largest generation and transmission cooperative in Texas providing wholesale power to its 16 member distribution cooperatives and one municipal customer, who serve over 496,000 customers in 68 Texas counties located in the ERCOT and SERC regions. Organized in 1941, Brazos Electric was the first cooperative formed in the Lone Star State for the purpose of generating and supplying wholesale electrical power. Today, it is a 3,052 MW generation and transmission cooperative whose members' service territory extends from the Texas Panhandle to the Houston area. The Brazos Electric transmission system is comprised of over 2,600 miles of transmission lines operating at 345 kV, 138 kV, and 69 kV in the ERCOT Region. Brazos Electric owns and operates nine substations radially connected to the Entergy Texas transmission system in the SERC Region but does not own or operate any transmission lines in the SERC Region. Brazos Electric's load in SERC is approximately 100 MW and is geographically located in five Texas Counties (Grimes, Madison, Montgomery, Robertson, and Walker). They receive electric service through an all requirements agreement with Entergy.

Audit Participants

The following is a listing of all personnel from the Audit Team and Brazos who were present during the meetings or interviews.

Audit Team Participants

Role	Title	Entity
Audit Team Lead	Senior Compliance Auditor	SERC
Team Member	Senior Compliance Auditor	SERC
Team Member	CIP Auditor	SERC

Brazos Audit Participants

Title	Entity
VP Transmission	Brazos
System Ops Manager	Brazos
Compliance Consultant (former acting Compliance Manager)	KEMA
Compliance Manager	Brazos
Chief Risk Officer	Brazos
General Counsel Officer	Segrest & Segrest

Audit Results

The audit team evaluated Brazos for compliance with 19 requirements in the 2011 NERC Compliance Monitoring and Enforcement Program (CMEP). The audit reviewed NERC Reliability Standards for the period of June 18, 2007 to July 20, 2011. Brazos submitted information and documentation for the audit team’s evaluation of compliance with requirements. The audit team reviewed and evaluated all information provided by Brazos to assess compliance with standards applicable to Brazos at this time.

Based on the information and documentation provided by Brazos, the audit team found Brazos to have no findings of non-compliance with 10 applicable requirements.

The audit team determined that nine requirements were not applicable to Brazos.

Findings

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

Reliability Std.	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
CIP-002 through CIP-009		Reviewed by a separate Monitoring Process
IRO-004-1	R4.	No Finding
IRO-005-2	R13.	No Finding
MOD-004-1	R3	No Finding
MOD-004-1	R10	No Finding
PRC-004-1	R1.	N/A
PRC-005-1	R1.	N/A
PRC-005-1	R2.	N/A
PRC-008-0	R1.	N/A
PRC-008-0	R2.	N/A
PRC-011-0	R1.	N/A
PRC-017-0	R1.	N/A
PRC-017-0	R2.	N/A
PRC-023-1	R1	N/A
TOP-002-2a	R3.	No Finding
TOP-002-2a	R18.	No Finding

Compliance Culture

The audit team assessed Brazos's Internal Compliance Program in conjunction with the audit. Evidence reviewed in assessing the program included: Brazos's Compliance Pre-Audit Survey, the Brazos Compliance Program Manual, compliance staff organizational charts, interviews with Brazos 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 Brazos's Internal Compliance Program documents and their staff's demonstrated compliance culture indicate an effective compliance program.

Additional information pertaining to the compliance culture of Brazos can be found in the Internal Compliance Survey.