



Compliance Audit Report Public Version

City of Bartow
NERC ID# 00003

**Does Not Contain Confidential Information
(including Privileged and Critical Energy
Infrastructure Information)**

Date of Audit: March 1 2011

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Executive Summary

A compliance audit of the City of Bartow (BAR), NERC ID # 00003 was conducted on March 1, 2011. At the time of the audit, BAR was registered for the Distribution Provider (DP) and Load Serving Entity (LSE) functions.

The audit team evaluated BAR for compliance with sixteen (16) requirements in the 2011 North American Electric Reliability Corporation (NERC) Compliance Monitoring and Enforcement Program (CMEP). The audit team assessed compliance with the NERC Reliability Standards, and applicable Regional Reliability Standards, for the period from June 18, 2007 till March 1, 2011. BAR submitted information and documentation for the audit team's evaluation of compliance with requirements. The audit team reviewed and evaluated all information provided by BAR to assess compliance with standards applicable to BAR at this time.

Based on the information and documentation provided by BAR, the audit team found BAR to have no findings of non-compliance with seven (7) applicable requirements. The audit team determined that nine (9) requirements were not applicable to BAR.

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 CMEP. There were not ongoing or recently completed mitigation plans and therefore none were reviewed by the audit team.

The Florida Reliability Coordinating Council, Inc. (FRCC) 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).*

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.

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

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.[†] The audit objectives are to:

- Review compliance with the requirements of reliability standards that are applicable to BAR, based on the functions that BAR 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 FRCC;
- Validate compliance with applicable regional standards from the FRCC 2011 Implementation Plan list of actively monitored standards;
- Validate evidence of self-reported violations and previous self-certifications;
- Observe and document BAR's compliance program and culture;

Scope

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

At the time of the audit, BAR was registered for the functions of Distribution Provider and Load Serving Entity. The audit team evaluated BAR for compliance during the period of June 18, 2007 to March 1, 2011.

Confidentiality and Conflict of Interest

Confidentiality and conflict of interest of the audit team are governed under the FRCC Delegation Agreement with NERC, and Section 1500 of the NERC Rules of Procedure. BAR was informed of FRCC's obligations and responsibilities under the agreement and procedures. The work history for each audit team member was provided to BAR. BAR 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. BAR 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 or access limitations placed upon this audit team by BAR.

Methodology

[†] North American Electric Reliability Corporation CMEP, paragraph 3.1, Compliance Audits

The audit team reviewed the information, data, and evidence submitted by BAR and assessed compliance with requirements of the applicable reliability standards. Submittal of information and data were sent to FRCC eighteen (18) 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. After that date, only data or information which was relevant to the content of the report or its finding 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 BAR. Data, information and evidence submitted in the form of policies, procedures, e-mails, 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

The City of Bartow is a municipal owned electric utility with City Commission and City Manager and various Department heads organization structure.

The City owns and operates six 69 kV – 12.47 kV substations serving approximately 11,000 customers within a service territory of approx. 115 square miles. The utility is a winter peaking utility with a peak system demand of 82 MW (2010) and prior to January 1, 2011 Progress Energy Florida (PEF) was the supplier of all of the City's energy. On January 1, 2011 till the date of the audit, Florida Municipal Power Pool (FMPP) began supplying all of the City of Bartow energy.

Audit Participants

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

Audit Team Participants

Title	Entity
Senior Compliance Auditor	FRCC
Senior Compliance Engineer	FRCC

BAR Audit Participants

Title	Entity
Interim Director	City of Bartow
Safety and Training Superintendent	City of Bartow
Engineering Supervisor	City of Bartow

Audit Results

The audit team evaluated BAR for compliance with sixteen (16) requirements in the 2011 NERC Compliance Monitoring and Enforcement Program (CMEP). The audit team assessed compliance with the NERC Reliability Standards, and applicable Regional Reliability Standards, for the period from June 18, 2007 till March 1, 2011. BAR submitted information and documentation for the audit team’s evaluation of compliance with requirements. The audit team reviewed and evaluated all information provided by BAR to assess compliance with standards applicable to BAR at this time.

Based on the information and documentation provided by BAR, the audit team found BAR to have no findings of non-compliance with seven (7) applicable requirements. The audit team determined that nine (9) requirements were not applicable to BAR.

Findings

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

Reliability 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
IRO-004-1	R4.	No Finding
IRO-005-2	R13.	Not Applicable
PRC-004-1	R1.	Not Applicable
PRC-005-1	R1.	Not Applicable
PRC-005-1	R2.	Not Applicable
PRC-008-0	R1.	Not Applicable

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

PRC-008-0	R2.	Not Applicable
PRC-011-0	R1.	Not Applicable
PRC-017-0	R1.	Not Applicable
PRC-017-0	R2.	Not Applicable
TOP-002-2a	R3.	No Finding
TOP-002-2a	R18.	No Finding

Compliance Culture

The City of Bartow did not have a documented Internal Compliance Program therefore its compliance culture was not reviewed by the audit team.