



Compliance Audit Report Public Version

City of Green Cove Springs
NERC ID# 00034

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

Date of Audit: July 12, 2011

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Executive Summary

A compliance audit of City of Green Cove Springs GCS, NERC ID # 00034 was conducted July 12, 2011. At the time of the audit, GCS was registered for the Distribution Provider (DP) function.

The audit team evaluated GCS for compliance six (6) Reliability Standards with ten (10) 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 to July 12, 2011. GCS submitted information and documentation for the audit team's evaluation of compliance with requirements. The audit team reviewed and evaluated all information provided by GCS to assess compliance with standards applicable to GCS at this time.

Based on the information and documentation provided by GCS, the audit team determined that ten (10) requirements were not applicable to GCS.

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. There was not ongoing or recently completed mitigation plans and therefore none was 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 the NERC 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 GCS, based on the function that GCS 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.

Scope

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

At the time of the audit, GCS was registered for the function of DP. The audit team evaluated GCS for compliance during the period of June 18, 2007 to June 29, 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. GCS was informed of FRCC's obligations and responsibilities under the agreement and procedures. The work history for each audit team member was provided to GCS. GCS 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. GCS 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 GCS.

Methodology

The audit team reviewed the information, data, and evidence submitted by GCS and assessed compliance with requirements of the applicable reliability standards. Submittal of information and data were sent to FRCC sixty (60) 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.

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

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 GCS. 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

GCS provide electric distribution services to the city of Green Cove Springs and the surrounding area. GCS had a winter peak of 33 MW.

Audit Participants

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

Audit Team Participants

Role	Title	Entity
Audit Team Lead	Senior Compliance Engineer	FRCC
Team Member	Compliance Engineer	FRCC

GCS Audit Participants

Title	Entity
Director Electric Utility	City of Green Cove Springs
	Consultant

Audit Results

The audit team evaluated GCS for compliance for six (6) Reliability Standards with ten (10) requirements in the 2011 NERC CMEP. The audit reviewed NERC Reliability Standards for the period of June 18, 2007 to July 12, 2011. GCS submitted information and documentation for the audit team's evaluation of compliance with requirements. The audit team reviewed and evaluated all information provided by GCS to assess compliance with standards applicable to GCS at this time.

Based on the information and documentation provided by GCS, the audit team found GCS that ten (10) requirements were not applicable to GCS. An audit report will be prepared to document these findings and the FRCC Director of Compliance will approve the final report.

Findings

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

Reliability Standard	Req.	Finding
PRC-004-1	R1	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-011-0	R1	Not Applicable
PRC-017-0	R1	Not Applicable
PRC-017-0	R2	Not Applicable
PRC-023-1	R1	Not Applicable
PRC-023-1	R2	Not Applicable

Compliance Culture

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