



**Compliance Audit Report  
Public Version  
FERC Order 693**

**NAES Corporation - Burney  
NERC ID# NCR05264**

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

**Date of Audit: June 14 – 15, 2011**

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## Executive Summary

A compliance audit of NAES Corporation - Burney (“NAES-BU”), NERC ID # - NCR05264 was conducted from June 14 - 15, 2011, 2011. At the time of the audit, NAES-BU was registered for the Generator Operator (“GOP”) functions.

The audit team evaluated NAES-BU for compliance with forty-five (“45”) reliability standard requirements, which included 43 requirements as directed by the 2011 NERC Compliance Monitoring and Enforcement Program Implementation Plan (“CMEP IP”) and two of the WECC Regional Reliability Standards requirements. The evaluation was for the period of June 18, 2007 to June 15, 2011.

NAES-BU submitted information and documentation for the audit team’s evaluation of compliance with requirements. The audit team reviewed and evaluated all information provided by NAES-BU to assess compliance with standards applicable to NAES-BU at this time. Based on the information and documentation provided by NAES-BU, the audit team determined the following findings for NAES-BU, summarized in the table below:

	No Finding	Not Applicable	OEA*	Possible Violation	Total
<b>Reliability Standard Requirements</b>	15	28	0	0	43
<b>WECC Regional Standard Requirements</b>	1	1	0	0	2
<b>Total</b>	<b>16</b>	<b>29</b>	<b>0</b>	<b>0</b>	<b>45</b>

\* Open Enforcement Action (see Findings section below for detailed explanation).

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 WECC Regional Reliability Standards, within the scope of the compliance audit. Any Possible Violations will be processed through the NERC and WECC CMEP. There were no 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 CMEP.<sup>1</sup>

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<sup>1</sup> This statement replaces the Regional Entity Self-Certification process.

## **Audit Process**

The compliance audit process steps are detailed in the WECC CMEP. The WECC 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.<sup>2</sup> The audit objectives are to:

- Review compliance with the requirements of reliability standards that are applicable to NAES-BU, based on the functions that NAES-BU 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 WECC;
- Validate compliance with applicable regional standards from the WECC 2011 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 2011 Implementation Plan. In addition, this audit included a review of any 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, NAES-BU was registered for the functions of GOP. The audit team evaluated NAES-BU for compliance during the period of June 18, 2007 to audit date.

## **Confidentiality and Conflict 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 ROP. NAES-BU was informed of WECC's obligations and responsibilities under the agreement and

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<sup>2</sup> North American Electric Reliability Corporation CMEP, paragraph 3.1, Compliance Audits

procedures. The work history for each audit team member was provided to NAES-BU. NAES-BU 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. NAES-BU 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 NAES-BU.

### ***Methodology***

The audit team reviewed the information, data, and evidence submitted by NAES-BU and assessed compliance with requirements of the applicable reliability standards. Submittal of information and data were sent to WECC ninety-eight ("98") 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 NAES-BU. 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. Where sampling is applicable to a requirement, the sample set is determined by a statistical methodology augmented with professional judgment to ensure that the sample set is representative of the requirement's significance 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***

North American Energy Services ("NAES") Corporation is the Generator Operator of the Burney Plant owned by Burney Forest Products. NAES, the energy industry's largest independent, third-part provider of operations and maintenance services, operates the plant under contract with Burney Forest Products.

Burney is an Independent Power Producer ("IPP") located in north-central California. Its host Balancing Authority is the California Independent System Operator ("CISO") with Pacific Gas and Electric ("PG&E") serving as the Transmission Operator.

The plant is a biomass, wood-fueled facility with a capacity of approximately 30 MW that generates at 13.8 kV and steps up to 230 kV through the generator step-up transformer. Burney owns the 230 kV line (1822 feet long) from the plant to the single point of interconnection with PG&E.

Andy Duncan, Plant Manager, NAES Corporation Burney reports to a Division Director who reports to the Vice President of Operations, who in turn reports to the CEO.

### ***Audit Participants***

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

### **Audit Team Participants**

<b>Role</b>	<b>Title</b>	<b>Entity</b>
Audit Team Lead	Senior Compliance Engineer	WECC
Team Member	Associate Compliance Engineer, Cyber Security	WECC
Team Member	Compliance Engineer, Cyber Security	WECC
Team Member	Consultant	WECC
Documentation	Compliance Program Coordinator	WECC

### **NAES-BU Audit Participants**

<b>Title</b>	<b>Entity</b>
Plant Manager	NAES-BU
Operations Manager	NAES-BU
Control Room Operator	NAES-BU

### **Audit Results**

The audit team evaluated NAES-BU for compliance with 45 Reliability standard requirements, which included 43 requirements as directed by the 2011 NERC CMEP IP and two of the WECC Regional Reliability Standards requirements. The evaluation was for the period of June 18, 2007 to June 15, 2011.

NAES-BU submitted information and documentation for the audit team's evaluation of compliance with requirements. The audit team reviewed and evaluated all information provided by NAES-BU to assess compliance with standards applicable to NAES-BU at this time. Based on the information and documentation provided by NAES-BU, the audit team determined the following findings for NAES-BU, summarized in the table below:

	No Finding	Not Applicable	OEA*	Possible Violation	Total
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\* Open Enforcement Action (see Findings section below for detailed explanation).

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 WECC Regional Reliability Standards, within the scope of the compliance audit. Any Possible Violations will be processed through the NERC and WECC CMEP. There were no ongoing or recently completed mitigation plans and therefore none were reviewed by the Audit Team.

### **Findings**

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

**No Finding (“NF”):** 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.

**Possible Violation (“PV”):** The audit team discovered areas of possible non-compliance based on the evidence presented by the Registered Entity and reviewed by the audit team.

**Not Applicable (“N/A”):**

- 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.

**Open Enforcement Action (“OEA”):** At the time of the audit the Registered Entity had an open action item regarding the Requirement. Such items may include, but not limited to, open mitigation plans, self-reports, or settlement agreements.

<b>Standard</b>	<b>Req.</b>	<b>Finding</b>
CIP-001-1	R1.	No Finding
CIP-001-1	R2.	No Finding
CIP-001-1	R3.	No Finding
CIP-001-1	R4.	No Finding
COM-002-2	R1.	No Finding
COM-002-2	R2.	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	R6.	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
PRC-001-1	R1.	No Finding
PRC-001-1	R2.	No Finding
PRC-001-1	R3.	No Finding
PRC-001-1	R4.	Not Applicable
PRC-001-1	R5.	No Finding
PRC-001-1	R6.	Not Applicable
TOP-002-2a	R3.	Not Applicable
TOP-002-2a	R6.	Not Applicable

<b>Standard</b>	<b>Req.</b>	<b>Finding</b>
TOP-002-2a	R11.	Not Applicable
TOP-002-2a	R18.	No Finding
VAR-002-1.1b	R1.	No Finding
VAR-002-1.1b	R2.	No Finding
VAR-002-1.1b	R3.	No Finding
VAR-STD-002a-1	WR1.	No Finding
VAR-STD-002b-1	WR1.	Not Applicable

### **Compliance Culture**

The NAES-BU compliance culture was not reviewed in detail by the audit team.

### **Exit Briefing**

To conclude the audit, the Audit Team leader gave a PowerPoint presentation for NAES-BU'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 NAES-BU on July 08, 2011 for review and comment. However, NAES-BU provided no comments.

### **Management Approval**

This report was reviewed and approved by John McGhee, WECC Director of Compliance Audits and Investigations on July 20<sup>th</sup>, 2011.