



## **Northeast Power Coordinating Council, Inc.**

**2008**

### **Implementation of NERC Compliance Monitoring and Enforcement Program**

#### **I. Introduction**

The Northeast Power Coordinating Council, Inc. (NPCC) is one of eight Regional Entities that have executed Regional Delegation Agreements (RDAs) with NERC (as the ERO). These RDAs give each Regional Entity the responsibility and authority to implement a compliance monitoring and enforcement program, for NERC Reliability Standards and Regional Reliability Standards, within their respective Region. NPCC has agreed to implement, in the United States, the NERC Compliance Monitoring and Enforcement Program (CMEP) approved by the Federal Energy Regulatory Commission.

In Canada, individual Memoranda of Understanding (MOU) with appropriate Canadian entities, Provincial regulatory and governmental authorities have been or will be developed and used to implement a compliance monitoring and enforcement program of NERC Reliability Standards and Regional Reliability Standards. In absence of these MOUs NPCC will continue to monitor and enforce compliance to NERC Reliability Standards using current established programs.

In addition the overall NPCC Compliance Program contains a component to monitor and enforce compliance to NPCC regionally-specific Reliability Criteria. This component will continue to use the current NPCC Reliability Compliance and Enforcement Program (RCEP) to accomplish this requirement. The RCEP is not covered by this implementation plan.

#### **II. Compliance Registration**

NPCC will maintain a Compliance Registry which is a listing of Registered Entities that are responsible for meeting the compliance requirements of both NERC and Regional Reliability Standards. The organizations in the listing will be registered based on the current descriptions and definitions contained in the latest versions of the NERC Functional Model, the NERC Glossary and the NERC Statement of Compliance Registry.

The Compliance Registry will be reviewed and updated on a monthly basis and changes to the Compliance Registry will be reported to NERC.

### **III. Compliance Reporting**

As stated earlier, NPCC will implement the uniform NERC CMEP consistent with the RDA between NERC and NPCC.

Annually NERC specifies a set of Reliability Standards (2008 Actively Monitored List - Appendix A) requiring compliance reporting by applicable Registered Entities through one of the monitoring methods described in the uniform NERC CMEP.

The following describe the various reporting methods:

#### **a. Self-Certification**

The tables in the NPCC Compliance Reporting Schedule for Actively Monitored Standards 2008 (Exhibit 1) specify the compliance reporting schedule for registered entities, also referred to as Responsible Entities in the Reliability Standards for 2008. For example, Table 1 defines the Reliability Standards, the applicable requirements, the reporting frequency and the due date for Balancing Authorities (BAs).

#### **b. Audit and Spot Check Program**

Annually NPCC develops a Compliance Audit Schedule as part of this implementation plan for approval by NERC. The Compliance Audit Schedule for 2008 (Exhibit 2) includes the names of the registered entities to be audited, the compliance registration, the type of audit to be conducted and the timeframe in which the entity will be audited. NPCC Staff will verify the specific dates when the audit will take place with the registered entity's contact. Worksheets developed by NERC for the audit of a particular standard will be used to aid in the audit as appropriate.

As prescribed in the CMEP, a Compliance Audit will include all Reliability Standards applicable to the Registered Entity monitored in the NERC Implementation Plan in the current and three previous years (Note: In 2008 the scope of the Compliance Audits will include the Reliability Standards included in the actively monitored lists for 2007 and 2008.). Compliance Audits may also include other Reliability Standards (not included on the actively monitored lists) applicable to the Registered Entity.

As defined in the CMEP, Spot Checking may be initiated by NPCC at any time to verify Self-Certifications and Periodic Data Submittals. Spot Checking may also be initiated in response to system events as described in the Reliability Standards or by operating problems.

**c. Periodic Data Submittals**

In 2008, NPCC will require Periodic Data Submittals, as stated in the applicable Reliability Standard, in accordance with the established schedules (Table 1) or on an as-needed basis.

**d. Other Non-Scheduled Reporting Methods**

For the 2008 CMEP NPCC may also receive compliance data via a number of other methods. These include: investigation of a system event, self-reporting, exception reporting and complaints. Details of these reporting methods are contained in Appendix 4C of the NERC Rules of Procedure.

**IV. NPCC Compliance Staff and Technical Committees**

Implementation of the NERC CMEP by NPCC requires that the NPCC independent Compliance Staff make the initial compliance determination for all compliance submittals. After consultation, as appropriate, with applicable technical committees NPCC independent Compliance Staff will then make the final compliance determination, including a recommended sanction or penalty, before forwarding a report to the NPCC Compliance Committee. The NPCC independent Compliance Staff will be bound by the antitrust guidelines, code of conduct, conflict of interest, confidentiality and any other applicable policies as referenced in the NERC CMEP.

**V. NPCC Compliance Hearings**

Compliance Hearings in NPCC will be conducted by an independent Hearing Officer. The Hearing Officer will review the evidence presented and render an opinion or finding. This opinion or finding will be forwarded to the NPCC Compliance Committee. The NPCC Compliance Committee shall serve in the role as the hearing body with authority to render decisions in Compliance Hearings in which a Registered Entity may contest a finding of alleged violation, proposed penalty or sanction, or a proposed mitigation plan. This committee will be appointed by the NPCC Board and will consist of either NPCC Board members or representatives appointed by the NPCC Board. Quorum and voting rules applicable to the NPCC Board as defined in the NPCC Bylaws shall apply to the NPCC Compliance Committee.

**VI. Communications**

**a. Compliance Workshop**

NPCC will conduct at least two compliance workshops during 2008 to provide the Registered Entities information necessary to assist in the implementation of the CMEP in 2008 and 2009.

**b. NPCC Website**

Responsible compliance entities will be encouraged to go to the compliance page on the NPCC website at [www.npcc.org](http://www.npcc.org) to obtain detailed information regarding the NPCC Compliance Program.

**VII. CMEP Data Administration Application**

NPCC will use the CMEP Data Administration Application (CDAA) to provide a secure online submittal of compliance reports for standards that are included in the 2008 Compliance Program. It includes tracking of submissions and communications regarding a submission. Each Registered Entity has a Master Account within the CDAA which shall be used for all submittals. NPCC will schedule regular user group meetings in coordination with the compliance workshops to keep registered entities informed of updates and also to obtain feedback from the registered entities on the CDAA.

**VIII. Conclusion**

In conclusion, the NPCC Compliance Monitoring and Enforcement Program implementation plan utilizes the compliance and audit processes defined in Appendix 4C of the NERC Rules of Procedure. This plan details the Compliance Reporting Schedule for actively monitored NERC Reliability Standards and the methods for monitoring them in 2008 as well as the 2008 Compliance Audit Schedule.

**Exhibit 1 – NPCC Compliance Reporting Schedule for Actively Monitored Standards - 2008**

<b>Table 1 – Balancing Authorities (BAs)</b>					
<b>Entity</b>	<b>Standard</b>	<b>Title</b>	<b>Requirements</b>	<b>Reporting Frequency</b>	<b>Due Date</b>
BA	EOP-001-0	Emergency Operations Planning	R1,R3-R7	Annual Self Certification	3/20/2008
BA	COM-001-1	Telecommunications	R2,R5	Annual Self Certification	5/20/2008
BA	COM-002-2	Communications and Coordination	R1	Annual Self Certification	5/20/2008
BA	INT-001-2	Interchange Information	R2	Annual Self Certification	5/20/2008
BA	INT-003-2	Interchange Transaction Implementation	R1	Annual Self Certification	5/20/2008
BA	CIP-002-1 to CIP-009-1	Cyber Security Status Report (CIP Survey)	All	Annual Self Certification	6/20/2008
BA	EOP-002-2	Capacity and Energy Emergencies	R1-R7	Annual Self Certification	7/20/2008
BA	EOP-003-1	Load Shedding Plans	R1-R8	Annual Self Certification	7/20/2008
BA	EOP-005-1	System Restoration Plans	R1,R5-R7,R11	Annual Self Certification	7/20/2008
BA	EOP-008-0	Plans for Loss of Control Center Functionality	R1	Annual Self Certification	7/20/2008
BA	CIP-001-1	Sabotage Reporting	R1-R4	Annual Self Certification	9/20/2008
BA	EOP-004-1	Disturbance Reporting	R2,R3	Annual Self Certification	1/20/2009
BA	IRO-001-1	Reliability Coordination – Responsibilities and Authorities	R8	Annual Self Certification	1/20/2009
BA	IRO-004-1	Reliability Coordination - Operations Planning	R3,R4,R7	Annual Self Certification	1/20/2009
BA	PER-002-0	Operating Personnel Training	R1-R4	Annual Self Certification	1/20/2009
BA	TOP-002-2	Normal Operations Planning	R1-R10,R17-R18	Annual Self Certification	1/20/2009
BA	TOP-003-0	Planned Outage Coordination	R2,R3	Annual Self Certification	1/20/2009
BA	TOP-005-1	Operational Reliability Information	R1	Annual Self Certification	1/20/2009

**Exhibit 1 – NPCC Compliance Reporting Schedule for Actively Monitored Standards - 2008**

<b>Table 2 – Distribution Providers (DPs)</b>					
<b>Entity</b>	<b>Standard</b>	<b>Title</b>	<b>Requirements</b>	<b>Reporting Frequency</b>	<b>Due Date</b>
DP	PRC-005-1	Transmission and Generation Protection System Maintenance and Testing	R1,R2	Annual Self Certification	3/20/2008
DP	PRC-008-0	Underfrequency Load Shedding Equipment Maintenance Programs	R1,R2	Annual Self Certification	3/20/2008
DP	PRC-017-0	Special Protection System Maintenance and Testing	R1,R2	Annual Self Certification	3/20/2008
DP	PRC-010-0	Assessment of the Design and Effectiveness of UVLS Program	R1,R2	Annual Self Certification	11/20/2008
DP	PRC-011-0	UVLS System Maintenance and Testing	R1,R2	Annual Self Certification	11/20/2008
DP	PRC-021-1	Under-Voltage Load Shedding Program Data	R1,R2	Annual Self Certification	11/20/2008
DP	PRC-016-0	Special Protection System Misoperations	R1-R3	Annual Self Certification	1/20/2009

**Exhibit 1 – NPCC Compliance Reporting Schedule for Actively Monitored Standards - 2008**

<b>Table 3 – Generator Owners (GOs)</b>					
<b>Entity</b>	<b>Standard</b>	<b>Title</b>	<b>Requirements</b>	<b>Reporting Frequency</b>	<b>Due Date</b>
GO	PRC-005-1	Transmission and Generation Protection System Maintenance and Testing	R1,R2	Annual Self Certification	3/20/2008
GO	PRC-017-0	Special Protection System Maintenance and Testing	R1,R2	Annual Self Certification	3/20/2008
GO	CIP-002-1 to CIP-009-1	Cyber Security Status Report (CIP Survey)	All	Annual Self Certification	6/20/2008
GO	EOP-009-0	Documentation of Blackstart Generating Unit Test Results	R2	Annual Self Certification	7/20/2008
GO	FAC-008-1	Facility Ratings Methodology	R1-R3	Annual Self Certification	9/20/2008
GO	FAC-009-1	Establish and Communicate Facility Ratings	R1,R2	Annual Self Certification	9/20/2008
GO	IRO-004-1	Reliability Coordination - Operations Planning	R4	Annual Self Certification	1/20/2009
GO	PRC-016-0	Special Protection System Misoperations	R1-R3	Annual Self Certification	1/20/2009
GO	VAR-002-1	Generator Operation for Maintaining Network Voltage Schedules	R4,R5	Annual Self Certification	1/20/2009

**Exhibit 1 – NPCC Compliance Reporting Schedule for Actively Monitored Standards - 2008**

<b>Table 4 – Generator Operators (GOPs)</b>					
<b>Entity</b>	<b>Standard</b>	<b>Title</b>	<b>Requirements</b>	<b>Reporting Frequency</b>	<b>Due Date</b>
GOP	COM-002-2	Communications and Coordination	R1	Annual Self Certification	5/20/2008
GOP	CIP-002-1 to CIP-009-1	Cyber Security Status Report (CIP Survey)	All	Annual Self Certification	6/20/2008
GOP	EOP-009-0	Documentation of Blackstart Generating Unit Test Results	R1,R2	Annual Self Certification	7/20/2008
GOP	CIP-001-1	Sabotage Reporting	R1-R4	Annual Self Certification	9/20/2008
GOP	EOP-004-1	Disturbance Reporting	R2,R3	Annual Self Certification	1/20/2009
GOP	IRO-001-1	Reliability Coordination – Responsibilities and Authorities	R8	Annual Self Certification	1/20/2009
GOP	IRO-004-1	Reliability Coordination - Operations Planning	R4	Annual Self Certification	1/20/2009
GOP	TOP-002-2	Normal Operations Planning	R3,R13-R15,R18	Annual Self Certification	1/20/2009
GOP	TOP-003-0	Planned Outage Coordination	R1-R3	Annual Self Certification	1/20/2009
GOP	VAR-002-1	Generator Operation for Maintaining Network Voltage Schedules	R1-R3,R5	Annual Self Certification	1/20/2009

**Exhibit 1 – NPCC Compliance Reporting Schedule for Actively Monitored Standards - 2008**

<b>Table 5 – Interchange Authorities (IAs)</b>					
<b>Entity</b>	<b>Standard</b>	<b>Title</b>	<b>Requirements</b>	<b>Reporting Frequency</b>	<b>Due Date</b>
IA	CIP-002-1 to CIP-009-1	Cyber Security Status Report (CIP Survey)	All	Annual Self Certification	6/20/2008

**Exhibit 1 – NPCC Compliance Reporting Schedule for Actively Monitored Standards - 2008**

<b>Table 6 – Load Serving Entities (LSEs)</b>					
<b>Entity</b>	<b>Standard</b>	<b>Title</b>	<b>Requirements</b>	<b>Reporting Frequency</b>	<b>Due Date</b>
LSE	CIP-002-1 to CIP-009-1	Cyber Security Status Report (CIP Survey)	All	Annual Self Certification	6/20/2008
LSE	CIP-001-1	Sabotage Reporting	R1-R4	Annual Self Certification	9/20/2008
LSE	PRC-010-0	Assessment of the Design and Effectiveness of UVLS Program	R1,R2	Annual Self Certification	11/20/2008
LSE	EOP-004-1	Disturbance Reporting	R2,R3	Annual Self Certification	1/20/2009
LSE	IRO-001-1	Reliability Coordination – Responsibilities and Authorities	R8	Annual Self Certification	1/20/2009
LSE	IRO-004-1	Reliability Coordination - Operations Planning	R4	Annual Self Certification	1/20/2009
LSE	TOP-002-2	Normal Operations Planning	R3,R17	Annual Self Certification	1/20/2009

**Exhibit 1 – NPCC Compliance Reporting Schedule for Actively Monitored Standards - 2008**

<b>Table 7 – Planning Authorities (PAs)</b>					
<b>Entity</b>	<b>Standard</b>	<b>Title</b>	<b>Requirements</b>	<b>Reporting Frequency</b>	<b>Due Date</b>
PA	FAC-013-1	Establish and Communicate Transfer Capabilities	R1,R2	Annual Self Certification	9/20/2008
PA	TPL-001-0	System Performance Under Normal Conditions	R1-R3	Annual Self Certification	1/20/2009
PA	TPL-002-0	System Performance Following Loss of a Single BES Element	R1-R3	Annual Self Certification	1/20/2009
PA	TPL-003-0	System Performance Following Loss of Two or More BES Elements	R1-R3	Annual Self Certification	1/20/2009
PA	TPL-004-0	System Performance Following Extreme BES Events	R1,R2	Annual Self Certification	1/20/2009

**Exhibit 1 – NPCC Compliance Reporting Schedule for Actively Monitored Standards - 2008**

<b>Table 8 – Purchasing-Selling Entities (PSEs)</b>					
<b>Entity</b>	<b>Standard</b>	<b>Title</b>	<b>Requirements</b>	<b>Reporting Frequency</b>	<b>Due Date</b>
PSE	INT-001-2	Interchange Information	R1	Annual Self Certification	5/20/2008
PSE	IRO-001-1	Reliability Coordination – Responsibilities and Authorities	R8	Annual Self Certification	1/20/2009
PSE	TOP-005-1	Operational Reliability Information	R4	Annual Self Certification	1/20/2009
PSE	VAR-001-1	Voltage and Reactive Control	R5	Annual Self Certification	1/20/2009

**Exhibit 1 – NPCC Compliance Reporting Schedule for Actively Monitored Standards - 2008**

<b>Table 9 – Reliability Coordinators (RCs)</b>					
<b>Entity</b>	<b>Standard</b>	<b>Title</b>	<b>Requirements</b>	<b>Reporting Frequency</b>	<b>Due Date</b>
RC	COM-001-1	Telecommunications	R2,R5	Annual Self Certification	5/20/2008
RC	COM-002-2	Communications and Coordination	R2	Annual Self Certification	5/20/2008
RC	CIP-002-1 to CIP-009-1	Cyber Security Status Report (CIP Survey)	All	Annual Self Certification	6/20/2008
RC	EOP-002-2	Capacity and Energy Emergencies	R1,R8,R9	Annual Self Certification	7/20/2008
RC	EOP-008-0	Plans for Loss of Control Center Functionality	R1	Annual Self Certification	7/20/2008
RC	IRO-014-1	Procedures, Processes, or Plans to Support Coordination Between Reliability Coordinators	R1-R4	Annual Self Certification	7/20/2008
RC	CIP-001-1	Sabotage Reporting	R1-R4	Annual Self Certification	9/20/2008
RC	FAC-013-1	Establish and Communicate Transfer Capabilities	R1,R2	Annual Self Certification	9/20/2008
RC	EOP-004-1	Disturbance Reporting	R2,R3	Annual Self Certification	1/20/2009
RC	EOP-006-1	Reliability Coordination – System Restoration	R1-R6	Annual Self Certification	1/20/2009
RC	IRO-001-1	Reliability Coordination – Responsibilities and Authorities	R1-R7,R9	Annual Self Certification	1/20/2009
RC	IRO-003-2	Reliability Coordination – Wide-Area View	R1,R2	Annual Self Certification	1/20/2009
RC	IRO-004-1	Reliability Coordination - Operations Planning	R1-R3,R5,R6	Annual Self Certification	1/20/2009
RC	IRO-015-1	Notifications and Information Exchange Between Reliability Coordinators	R1-R3	Annual Self Certification	1/20/2009
RC	IRO-016-1	Coordination of Real-time Activities Between Reliability Coordinators	R1,R2	Annual Self Certification	1/20/2009
RC	PER-004-1	Reliability Coordination – Staffing	R1-R5	Annual Self Certification	1/20/2009
RC	TOP-003-0	Planned Outage Coordination	R1,R4	Annual Self Certification	1/20/2009
RC	TOP-005-1	Operational Reliability Information	R1,R3	Annual Self Certification	1/20/2009

**Exhibit 1 – NPCC Compliance Reporting Schedule for Actively Monitored Standards - 2008**

<b>Table 10 – Transmission Owners (TOs)</b>					
<b>Entity</b>	<b>Standard</b>	<b>Title</b>	<b>Requirements</b>	<b>Reporting Frequency</b>	<b>Due Date</b>
TO	FAC-003-1	Vegetation Management Program	R1,R2	Annual Self Certification	3/20/2008
TO	PRC-005-1	Transmission and Generation Protection System Maintenance and Testing	R1,R2	Annual Self Certification	3/20/2008
TO	PRC-008-0	Underfrequency Load Shedding Equipment Maintenance Programs	R1,R2	Annual Self Certification	3/20/2008
TO	PRC-011-0	UVLS System Maintenance and Testing	R1,R2	Annual Self Certification	3/20/2008
TO	PRC-017-0	Special Protection System Maintenance and Testing	R1,R2	Annual Self Certification	3/20/2008
TO	CIP-002-1 to CIP-009-1	Cyber Security Status Report (CIP Survey)	All	Annual Self Certification	6/20/2008
TO	FAC-008-1	Facility Ratings Methodology	R1-R3	Annual Self Certification	9/20/2008
TO	FAC-009-1	Establish and Communicate Facility Ratings	R1,R2	Annual Self Certification	9/20/2008
TO	PRC-010-0	Assessment of the Design and Effectiveness of UVLS Program	R1,R2	Annual Self Certification	11/20/2008
TO	PRC-021-1	Under-Voltage Load Shedding Program Data	R1,R2	Annual Self Certification	11/20/2008
TO	IRO-004-1	Reliability Coordination - Operations Planning	R4	Annual Self Certification	1/20/2009
TO	PRC-016-0	Special Protection System Misoperations	R1-R3	Annual Self Certification	1/20/2009
TO	FAC-003-1	Vegetation Management Program	R3	Quarterly Report	4/20/2008 7/20/2008 10/20/2008 1/20/2009

**Exhibit 1 – NPCC Compliance Reporting Schedule for Actively Monitored Standards - 2008**

**Table 11 – Transmission Operators (TOPs)**

<b>Entity</b>	<b>Standard</b>	<b>Title</b>	<b>Requirements</b>	<b>Reporting Frequency</b>	<b>Due Date</b>
TOP	EOP-001-0	Emergency Operations Planning	R2-R7	Annual Self Certification	3/20/2008
TOP	COM-001-1	Telecommunications	R2,R5	Annual Self Certification	5/20/2008
TOP	COM-002-2	Communications and Coordination	R1,R2	Annual Self Certification	5/20/2008
TOP	CIP-002-1 to CIP-009-1	Cyber Security Status Report (CIP Survey)	All	Annual Self Certification	6/20/2008
TOP	EOP-003-1	Load Shedding Plans	R1-R8	Annual Self Certification	7/20/2008
TOP	EOP-005-1	System Restoration Plans	R1-R11	Annual Self Certification	7/20/2008
TOP	EOP-008-0	Plans for Loss of Control Center Functionality	R1	Annual Self Certification	7/20/2008
TOP	CIP-001-1	Sabotage Reporting	R1-R4	Annual Self Certification	9/20/2008
TOP	PRC-010-0	Assessment of the Design and Effectiveness of UVLS Program	R1,R2	Annual Self Certification	11/20/2008
TOP	EOP-004-1	Disturbance Reporting	R2,R3	Annual Self Certification	1/20/2009
TOP	IRO-001-1	Reliability Coordination – Responsibilities and Authorities	R8	Annual Self Certification	1/20/2009
TOP	IRO-004-1	Reliability Coordination - Operations Planning	R3,R4,R7	Annual Self Certification	1/20/2009
TOP	PER-002-0	Operating Personnel Training	R1-R4	Annual Self Certification	1/20/2009
TOP	TOP-002-2	Normal Operations Planning	R1,R2,R4-R6,R10,R16-19	Annual Self Certification	1/20/2009
TOP	TOP-003-0	Planned Outage Coordination	R1-R3	Annual Self Certification	1/20/2009
TOP	TOP-004-1	Transmission Operations	R6	Annual Self Certification	1/20/2009
TOP	TOP-005-1	Operational Reliability Information	R1	Annual Self Certification	1/20/2009
TOP	VAR-001-1	Voltage and Reactive Control	R1-R4,R6-R12	Annual Self Certification	1/20/2009

**Exhibit 1 – NPCC Compliance Reporting Schedule for Actively Monitored Standards - 2008**

<b>Table 12 – Transmission Planners (TPs)</b>					
<b>Entity</b>	<b>Standard</b>	<b>Title</b>	<b>Requirements</b>	<b>Reporting Frequency</b>	<b>Due Date</b>
TP	TPL-001-0	System Performance Under Normal Conditions	R1-R3	Annual Self Certification	1/20/2009
TP	TPL-002-0	System Performance Following Loss of a Single BES Element	R1-R3	Annual Self Certification	1/20/2009
TP	TPL-003-0	System Performance Following Loss of Two or More BES Elements	R1-R3	Annual Self Certification	1/20/2009
TP	TPL-004-0	System Performance Following Extreme BES Events	R1,R2	Annual Self Certification	1/20/2009

**Exhibit 1 – NPCC Compliance Reporting Schedule for Actively Monitored Standards - 2008**

<b>Table 13 – Transmission Service Providers (TSPs)</b>					
<b>Entity</b>	<b>Standard</b>	<b>Title</b>	<b>Requirements</b>	<b>Reporting Frequency</b>	<b>Due Date</b>
TSP	CIP-002-1 to CIP-009-1	Cyber Security Status Report (CIP Survey)	All	Annual Self Certification	6/20/2008
TSP	IRO-001-1	Reliability Coordination – Responsibilities and Authorities	R8	Annual Self Certification	1/20/2009
TSP	IRO-004-1	Reliability Coordination - Operations Planning	R7	Annual Self Certification	1/20/2009
TSP	TOP-002-2	Normal Operations Planning	R3,R12	Annual Self Certification	1/20/2009

**Exhibit 2 – NPCC Compliance Audit Schedule – 2008**

October 29, 2007

**2008 NPCC Compliance Audit Schedule**

Registered Entity Name	Audit As	Audit Type	Date
AES Cayuga	GO, GOP	Off-Site	1/2/2008
AES Thames	GO	Off-Site	1/7/2008
AES Greenidge	GO, GOP	Off-Site	1/14/2008
AES Somerset	GO, GOP	Off-Site	1/21/2008
AES Westover	GO, GOP	Off-Site	1/28/2008
ANP Bellingham Energy Company	GO	Off-Site	2/4/2008
ANP Blackstone Energy Company	GO	Off-Site	2/11/2008
ANP Funding I, LLC	PSE	Off-Site	2/18/2008
Arthur Kill Power LLC	GO, GOP	Off-Site	2/25/2008
Ashburnham Municipal Light Plant	DP,LSE	Off-Site	3/3/2008
Vermont Transco, LLC	TO, TOP, TP,TSP	On-Site	3/4/08-3/5/08
Astoria Gas Turbine Power LLC	GO, GOP	Off-Site	3/10/2008
Astoria Generating Company L.P.	GO	Off-Site	3/17/2008
Bangor Hydro-Electric Company	DP, TO, TP.TSP	Off-Site	3/24/2008
Bayswater Peaking Facility, LLC	GO, GOP	Off-Site	4/1/2008
Bear Swamp Power Company LLC	GO	Off-Site	4/7/2008
Bethpage Energy Center 3, LLC	GO	Off-Site	4/14/2008
BG Dighton Power LLC	GO, GOP	Off-Site	4/21/2008
Black Oak Energy, LLC	PSE	Off-Site	4/28/2008
Black River Generation, LLC	GO	Off-Site	5/5/2008
New Brunswick System Operator	BA,PA,RC,RP,RSG, TOP, TSP	On-Site	5/6/08-5/8/08
Boston Generating, LLC	PSE	Off-Site	5/12/2008
BP Energy Company	PSE	Off-Site	5/19/2008
Braintree Electric Light Department	DP, GO, GOP,LSE,PSE, TO	Off-Site	5/26/2008
Bucksport Energy LLC	GO	Off-Site	6/2/2008
Verso Paper Holdings LLC	GO	Off-Site	6/3/2008
Burlington Electric Department	DP, LSE, PSE	Off-Site	6/9/2008

**Exhibit 2 – NPCC Compliance Audit Schedule – 2008**

October 29, 2007

Calpine Energy Services	GOP, PSE	Off-Site	6/16/2008
Ontario IESO	BA,RC,RP, TOP, TSP	On-Site	6/17/08- 6/19/08
Capital District Energy Center	GO, GOP	Off-Site	6/23/2008
Central Hudson Gas & Electric Corporation	DP, LSE, TO	Off-Site	7/7/2008
Chicopee Municipal Lighting Plant	DP, LSE	Off-Site	7/14/2008
Citigroup Energy Inc.	PSE	Off-Site	7/21/2008
CMEEC	GO, GOP	Off-Site	8/4/2009
CMEEC Jewitt City Dept of Public Utilities	DP	Off-Site	8/11/2008
CMEEC Bozrah Light and Power Company	DP, LSE, TO	Off-Site	8/13/2008
CMEEC Groton Utilities	DP, LSE, TO	Off-Site	8/18/2008
Cogen Technologies Linden Venture L.P.	GO, GOP	Off-Site	9/1/2008
Connecticut Jet Power LLC	GO, GOP	Off-Site	9/8/2008
Connecticut Light & Power Company	DP, LSE, PSE, TO	Off-Site	9/15/2008
Connecticut Resource Recovery Authority	GO	Off-Site	9/22/2008
New England Electric Transmission Corporation	TO, TOP, TP	On-Site	9/29/2008
New England Hydro Transmission Corporation	TO, TOP, TP	On-Site	to
New England Hydro Transmission Electric Company	TO, TOP, TP	On-Site	
New England Power Company	PSE, TO, TOP, TP, TSP	On-Site	10/3/2008
Dominion Energy Brayton Point LLC	GOP	Off-Site	10/6/2008
Dominion Energy Manchester Street, Inc.	GOP	Off-Site	10/8/2008
Dominion Energy Marketing	PSE	Off-Site	10/13/2008
Dominion Energy New England, Inc.	GO	Off-Site	10/15/2008
Dominion Energy Salem Harbor, LLC	GO, GOP	Off-Site	10/20/2008
Dominion Nuclear Connecticut, Inc.	LSE, PSE	Off-Site	10/22/2008
Dominion Retail, Inc.	PSE	Off-Site	10/27/2008
Constellation Energy Commodities Group Maine, LLC	PSE	Off-Site	11/3/2008
Constellation Energy Commodities Group, Inc	PSE	Off-Site	11/10/2008
Constellation NewEnergy, Inc.	PSE	Off-Site	11/17/2008

## **APPENDIX A**

### **Actively Monitored NERC Reliability Standards 2008**

**2008 CMEP Matrix  
NERC Reliability Standards**

	<b>Std #</b>	<b>Requirements</b>	<b>Standard</b>	<b>Who</b>	<b>Purpose</b>	<b>3-Year On-Site Audit</b>	<b>Self-Certification</b>	<b>Monthly/Quarterly Reporting</b>	<b>Exception Reporting</b>	<b>Investigation</b>
1	BAL-001-0	All	<b>Real Power Balancing Control Performance</b>	BA	To maintain Interconnection steady-state frequency within defined limits by balancing real power demand and supply in real-time.	√		M		
2	BAL-002-0	All	<b>Disturbance Control Performance</b>	BA, RSG, RRO	To ensure the Balancing Authority is able to utilize its Contingency Reserve to balance resources and demand and return Interconnection frequency within defined limits.	√-8		Q		
3	BAL-003-0	All	<b>Frequency Response and Bias</b>	BA	This standard provides a consistent method for calculating the Frequency Bias component of ACE.	√				
4	BAL-004-0	All	<b>Time Error Correction</b>	RC and BA	The purpose of this standard is to ensure that Time Error Corrections are conducted in a manner that does not adversely affect the reliability of the Interconnection.	√-8				
5	BAL-005-0	All	<b>Automatic Generation Control</b>	BA, GOP, TOP and LSE	This standard establishes requirements for Balancing Authority Automatic Generation Control (AGC) necessary to calculate Area Control Error (ACE) and to routinely deploy the Regulating Reserve. The standard also ensures that all facilities and load electrically synchronized to the Interconnection are included within the metered boundary of a Balancing Area so that balancing of resources and demand can be achieved.	√-8				

√-8 = added for the 2008 compliance year

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NERC Reliability Standards**

	<b>Std #</b>	<b>Requirements</b>	<b>Standard</b>	<b>Who</b>	<b>Purpose</b>	<b>3-Year On-Site Audit</b>	<b>Self-Certification</b>	<b>Monthly/Quarterly Reporting</b>	<b>Exception Reporting</b>	<b>Investigation</b>
6	BAL-006-1	All	<b>Inadvertent Interchange</b>	BA	This standard defines a process for monitoring Balancing Authorities to ensure that, over the long term, Balancing Authority Areas do not excessively depend on other Balancing Authority Area so that balancing of resources and demand can be achieved.	√-8		M	√	
7	BAL-STD-002-0	All-WECC Only	<b>Operating Reserves (WECC)</b>	BA and RSG	Regional Reliability Standard to address the Operating Reserve requirements of the Western Interconnection.	√-8		Q	√	
8	CIP-001-1	All	<b>Sabotage Reporting</b>	RC, BA, TOP, GOP, LSE	Disturbances or unusual occurrences, suspected or determined to be caused by sabotage, shall be reported to the appropriate systems, governmental agencies, and regulatory bodies.	√	√			
9	CIP-002-1 through CIP-009-1	All	<b>Critical Infrastructure Protection Standards</b>	BA, GO, GOP, IA, LSE, NERC, RC, RRO, TO, TOP, TSP	Cyber Security Standards- Follow revised Implementation Plan for Cyber Security Standards CIP-002-1 through CIP-009-1		√			
10	COM-001-1	R2 and R5	<b>Telecommunications</b>	TOP, BA, RC, NERCNet User Organizations.	Each Reliability Coordinator, Transmission Operator and Balancing Authority needs adequate and reliable telecommunications facilities internally and with others for the exchange of interconnection and operating information necessary to maintain reliability.	√	√			

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NERC Reliability Standards**

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11	COM-002-2	All	<b>Communications and Coordination</b>	RC, BA, TOP and GOP	To ensure Balancing Authorities, Transmission Operators, and Generator Operators have adequate communications and that these communications capabilities are staffed and available for addressing a real-time emergency condition. To ensure communications by operating personnel are effective.	√-8	√			
12	EOP-001-0	All	<b>Emergency Operations Planning</b>	BA, TOP	Each Transmission Operator and Balancing Authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies. These plans need to be coordinated with other Transmission Operators and Balancing Authorities, and the Reliability Coordinator.	√	√			
13	EOP-002-2	All	<b>Capacity and Energy Emergencies</b>	RC and BA	To ensure Reliability Coordinators and Balancing Authorities are prepared for capacity and energy emergencies.	√-8	√			√
14	EOP-003-1	All	<b>Load Shedding Plans</b>	BA, TOP	A Balancing Authority and Transmission Operator operating with insufficient generation or transmission capacity must have the capability and authority to shed load rather than risk an uncontrolled failure of the Interconnection.	√	√			

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NERC Reliability Standards**

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15	EOP-004-1	All	<b>Disturbance Reporting</b>	RC, BA, TOP, GOP, LSE and RRO	Disturbances or unusual occurrences that jeopardize the operation of the Bulk Electric System, or result in system equipment damage or customer interruptions, need to be studied and understood to minimize the likelihood of similar events in the future.	√-8	√			√
16	EOP-005-1	All	<b>System Restoration Plans</b>	BA, TOP	To ensure plans, procedures, and resources are available to restore the electric system to a normal condition in the event of a partial or total shut down of the system	√-8	√			
17	EOP-006-1	All	<b>Reliability Coordination – System Restoration</b>	RC	The Reliability Coordinator must have a coordinating role in system restoration to ensure reliability is maintained during restoration and priority is placed on restoring the Interconnection.	√	√			
18	EOP-008-0	All	<b>Plans for Loss of Control Center Functionality</b>	BA, RC, TOP	Each reliability entity must have a plan to continue reliability operations in the event its control center becomes inoperable.	√	√			
19	EOP-009-0	All	<b>Documentation of Blackstart Generating Unit Test Results</b>	GO, GOP	To ensure that the quantity and location of system blackstart generators are sufficient and that they can perform their expected functions.	√	√			

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20	FAC-003-1	All	<b>Vegetation Management</b>	RRO, TO	To improve the reliability of the electric transmission systems by preventing outages from vegetation located on transmission rights-of-way (ROW) and minimizing outages from vegetation located adjacent to ROW, maintaining clearances between transmission lines	√	√	Q		
21	FAC-008-1	All	<b>Facility Ratings Methodology</b>	GO, TO	To ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on an established methodology	√	√			
22	FAC-009-1	All	<b>Establish and Communicate Facility Ratings</b>	GO, TO	To ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on an established methodology or methodologies.	√	√			
23	FAC-013-1	All	<b>Establish and Communicate Transfer Capabilities</b>	RC and PA	To ensure that Transfer Capabilities used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on an established methodology or methodologies.	√-8	√			
24	INT-001-2	All	<b>Interchange Information</b>	BA and PSE	To ensure that Interchange information is submitted to the NERC-identified reliability analysis service.	√-8	√			√

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NERC Reliability Standards**

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25	INT-003-2	All	<b>Interchange Transaction Implementation</b>	BA	To ensure Balancing Authorities confirm Interchange Schedules with Adjacent Balancing Authorities prior to implementing the schedules in their Area Control Error (ACE) equations.	√-8	√			√
26	INT-004-1	All	<b>Dynamic Interchange Transaction Modifications</b>	RC, BA, TOP and PSE	To ensure Dynamic Transfers are adequately tagged to be able to determine their reliability impacts.	√-8				
27	IRO-001-1	All	<b>Reliability Coordination – Responsibilities and Authorities</b>	BA, GOP, LSE, PSE, RC, RRO, TOP, TSP	Reliability Coordinators must have the authority, plans, and agreements in place to immediately direct reliability entities within their Reliability Coordinator Areas to re-dispatch generation, reconfigure transmission, or reduce load to mitigate critical conditions to return the system to a reliable state. If a Reliability Coordinator delegates tasks to others, the Reliability Coordinator retains its responsibilities for complying with NERC and regional standards. Standards of conduct are necessary to ensure the Reliability Coordinator does not act in a manner that favors one market participant over another.	√	√			
28	IRO-003-2	All	<b>Reliability Coordination – Wide-Area View</b>	RC	The Reliability Coordinator must have a wide-area view of its own Reliability Coordinator Area and that of neighboring Reliability Coordinators.	√-8	√			√

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NERC Reliability Standards**

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29	IRO-004-1	All	<b>Reliability Coordination — Operations Planning</b>	BA, GO, GOP, LSE, RC, TO, TOP, TSP	Each Reliability Coordinator must conduct next-day reliability analyses for its Reliability Coordinator Area to ensure the Bulk Electric System can be operated reliably in anticipated normal and Contingency conditions.	√	√		√	
30	IRO-005-1	All	<b>Reliability Coordination – Current-Day Operations</b>	RC, BA, TOP, TSP, GOP, LSE AND PSE	The Reliability Coordinator must be continuously aware of conditions within its Reliability Coordinator Area and include this information in its reliability assessments. The Reliability Coordinator must monitor Bulk Electric System parameters that may have significant impacts upon the Reliability Coordinator Area and neighboring Reliability Coordinator Areas.	√-8				
31	IRO-006-3	All	<b>Reliability Coordination – Transmission Loading Relief</b>	RC, TOP and BA	Regardless of the process it uses, the Reliability Coordinator must direct its Balancing Authorities and Transmission Operators to return the transmission system to within its Interconnection Reliability Operating Limits as soon as possible, but no longer than 30 minutes. The Reliability Coordinator needs to direct Balancing Authorities and Transmission Operators to execute actions such as reconfiguration, redispatch, or load shedding until relief requested by the TLR process is achieved.	√-8				√

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NERC Reliability Standards**

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32	IRO-014-1	All	<b>Procedures, Processes, or Plans to Support Coordination Between Reliability Coordinators</b>	RC	To ensure that each Reliability Coordinator's operations are coordinated such that they will not have an Adverse Reliability Impact on other Reliability Coordinator Areas and to preserve the reliability benefits of interconnected operations.	√	√			
33	IRO-015-1	All	<b>Notifications and Information Exchange Between Reliability Coordinators</b>	RC	To ensure that each Reliability Coordinator's operations are coordinated such that they will not have an Adverse Reliability Impact on other Reliability Coordinator Areas and to preserve the reliability benefits of interconnected operations.	√	√			
34	IRO-016-1	All	<b>Coordination of Real-time Activities Between Reliability Coordinators</b>	RC	To ensure that each Reliability Coordinator's operations are coordinated such that they will not have an Adverse Reliability Impact on other Reliability Coordinator Areas and to preserve the reliability benefits of interconnected operations.	√	√			
35	IRO-STD-006-0	All	<b>Qualified Path Unscheduled Flow Relief (WECC)</b>	BA, TOP and LSE	Mitigation of transmission overloads due to unscheduled line flow on Qualified Paths.	√-8			√	
36	PER-002-0	All	<b>Operating Personnel Training</b>	BA, TOP	Each Transmission Operator and Balancing Authority must provide their personnel with a coordinated training program that will ensure reliable system operation.	√	√			

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NERC Reliability Standards**

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37	PER-003-0	All	<b>Operating Personnel Credentials</b>	BA, RC, TOP	Certification of operating personnel is necessary to ensure minimum competencies for operating a reliable Bulk Electric System.	√			√	
38	PER-004-1	All	<b>Reliability Coordination — Staffing</b>	RC	Reliability Coordinators must have sufficient, competent staff to perform the Reliability Coordinator functions.		√			
39	PRC-004-1	All	<b>Analysis and Mitigation of Transmission and Generation Protection System Misoperations</b>	DP*, GO, TO	Provide trip operation / misoperation information per regional process.	√	√			
40	PRC-005-1	All	<b>Transmission and Generation Protection System Maintenance and Testing</b>	DP*, GO, TO	Document/implement transmission protection system maintenance/testing/monitoring PROGRAM	√	√			
41	PRC-008-0	All	<b>Implementation and Documentation of Underfrequency Load Shedding Equipment Maintenance Program</b>	DP, TO	Document/implement UFLS maintenance/testing PROGRAM	√	√			
42	PRC-010-0	All	<b>Technical Assessment of the Design and Effectiveness of Undervoltage Load Shedding Program.</b>	DP, LSE, TO, TOP	ASSESS design and effectiveness of UVLS programs	√	√			

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43	PRC-011-0	All	<b>UVLS System Maintenance and Testing</b>	DP, TO	Document/implement UVLS maintenance/testing PROGRAM	√	√			
44	PRC-016-0	All	<b>Special Protection System Misoperations</b>	DP, GO, TO	DOCUMENT/analyze misoperations	√	√			
45	PRC-017-0	All	<b>Special Protection System Maintenance and Testing</b>	DP, GO, TO	Document/implement SPS maintenance/testing PROGRAM	√	√			
46	PRC-021-1	All	<b>Under-Voltage Load Shedding Program Data</b>	DP, TO	DOCUMENTATION of undervoltage load shedding program	√	√			
47	TOP-002-2	All	<b>Normal Operations Planning</b>	BA, TOP, GOP, LSE and TSP	Current operations plans and procedures are essential to being prepared for reliable operations, including response for unplanned events.	√-8	√			√
48	TOP-003-0	All	<b>Planned Outage Coordination</b>	BA, GOP, RC, TOP	Scheduled generator and transmission outages that may affect the reliability of interconnected operations must be planned and coordinated among Balancing Authorities, Transmission Operators, and Reliability Coordinators.	√	√			√
49	TOP-004-1	R6	<b>Transmission Operations</b>	TOP	To ensure that the transmission system is operated so that instability, uncontrolled separation, or cascading outages will not occur as a result of the most severe single Contingency and specified multiple Contingencies.	√-8	√			√

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50	TOP-005-1	All	<b>Operational Reliability Information</b>	BA, PSE, RC, TOP	To ensure reliability entities have the operating data needed to monitor system conditions within their areas.	√	√		√	
51	TOP-007-0	All	<b>Reporting System Operating Limit (SOL) and Interconnection Reliability</b>	RC, TOP	Ensure SOL and IROL violations are being reported to the Reliability Coordinator so that the Reliability Coordinator may evaluate actions being taken and direct additional corrective actions as needed.	√			√	
52	TPL-001-0	All	<b>System Performance Under Normal (No Contingency) Conditions</b>	PA, TP	System performance under normal conditions	√	√			
53	TPL-002-0	All	<b>System Performance Following Loss of a Single Bulk Electric System Element</b>	PA, TP	System performance under single contingency	√	√			
54	TPL-003-0	All	<b>System Performance Following Loss of Two or More Bulk Electric System Elements</b>	PA, TP	System performance under multiple contingencies	√	√			
55	TPL-004-0	All	<b>System Performance Following Extreme Events Resulting in the Loss of Two or More Bulk Electric System Elements</b>	PA, TP	System performance under extreme contingencies	√	√			

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56	VAR-001-1	All	<b>Voltage and Reactive Control</b>	PSE, TOP	To ensure voltage levels, reactive flows, and reactive resources are monitored, controlled, and maintained within limits in real time to protect equipment and the reliable operation of the Interconnection.	√	√			
57	VAR-002-1	All	<b>Generator Operation for Maintaining Network Voltage Schedules</b>	GO and GOP	To ensure generators provide reactive and voltage control necessary to ensure voltage levels, reactive flows, and reactive resources are maintained within applicable Facility Ratings to protect equipment and the reliable operation of the Interconnection.	√-8	√			√