



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

July 30, 2010

Ms. Kimberly Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

**Re: NERC Abbreviated Notice of Penalty
Greenwood Commissioners of Public Works (CPW), FERC Docket No. NP10-__ -
000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Abbreviated Notice of Penalty (NOP) regarding CPW, with information and details regarding the nature and resolution of the violation¹ discussed in detail in the Settlement Agreement (Attachment b) and the Disposition Document (Attachment c), in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations and orders, as well as the NERC Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).²

On October 1, 2009, CPW submitted a self-report and self-certification to SERC Reliability Corporation (SERC) regarding its possible non-compliance with CIP-001-1 Requirement (R) 1 through R4 to SERC for CPW's failure to have a procedure for (1) recognizing sabotage events and at what stage in the process operating personnel are made aware of the event; (2) making communication of sabotage events to appropriate parties in the Interconnection; (3) making sabotage response guidelines available to operating personnel; and (4) reporting to or coordinating with local Federal Bureau of Investigation (FBI) personnel in the event of a sabotage event. This NOP is being filed with the Commission because SERC and CPW have entered into a Settlement Agreement to resolve all outstanding issues arising from SERC's determination and findings of the enforceable violations of CIP-001-1 R1 through R4.

¹ For purposes of this document, each violation at issue is described as a "violation," regardless of its procedural posture and whether it was a possible, alleged or confirmed violation.

² *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards* (Order No. 672), III FERC Stats. & Regs. ¶ 31,204 (2006); *Notice of New Docket Prefix "NP" for Notices of Penalty Filed by the North American Electric Reliability Corporation*, Docket No. RM05-30-000 (February 7, 2008). See also 18 C.F.R. Part 39 (2010). *Mandatory Reliability Standards for the Bulk-Power System*, FERC Stats. & Regs. ¶ 31,242 (2007) (Order No. 693), *reh'g denied*, 120 FERC ¶ 61,053 (2007) (Order No. 693-A). See 18 C.F.R. § 39.7(c)(2).

According to the Settlement Agreement, CPW admits the violations and has agreed to the assessed penalty of ten thousand dollars (\$10,000) in addition to other remedies and actions to mitigate the instant violations and facilitate future compliance under the terms and conditions of the Settlement Agreement. Accordingly, the violations identified as NERC Violation Tracking Identification Numbers SERC200900333, SERC200900334, SERC200900335 and SERC200900336 are being filed in accordance with the NERC Rules of Procedure and the CMEP.

Statement of Findings Underlying the Violations

This NOP incorporates the findings and justifications set forth in the Settlement Agreement executed on February 18, 2010, by and between SERC and CPW. The details of the findings and the basis for the penalty are set forth in the Disposition Document. This NOP filing contains the basis for approval of the Settlement Agreement by the NERC Board of Trustees Compliance Committee (BOTCC). In accordance with Section 39.7 of the Commission's regulations, 18 C.F.R. § 39.7, NERC provides the following summary table identifying each violation of a Reliability Standard resolved by the Settlement Agreement, as discussed in greater detail below.

Region	Registered Entity	NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Total Penalty (\$)
SERC	Greenwood Commissioners of Public Works	NOC-499	SERC200900333	CIP-001-1	1	Medium	10,000
			SERC200900334		2	Medium	
			SERC200900335		3	Medium	
			SERC200900336		4	Medium	

The text of the Reliability Standard at issue is set forth in the Disposition Document.

CIP-001-1 R1 through R4 - OVERVIEW³

Upon review of a self-report and a self-certification submitted by CPW, SERC determined that CPW, as a Load Serving Entity, did not (1) have procedures for the recognition of and for making its operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection; (2) have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection; (3) provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage event; or (4) establish communications contacts, as applicable, with local FBI officials and develop reporting procedures as appropriate to its circumstances.

³ Further information on this violation is contained in the Disposition Document included as Attachment c to the Settlement Agreement.

The duration of the CIP-001-1 R1 through R4 violations was from June 18, 2007, when the Standard became mandatory and enforceable, through September 30, 2009, the date CPW completed its Mitigation Plan.

SERC concluded that this violation did not pose a serious or substantial risk to the reliability of the bulk power system (BPS) because CPW's total load is less than 75 MW and it is connected to the Interconnection via a radial connection. Additionally, there were no reported sabotage events that occurred in CPW's system.

Statement Describing the Assessed Penalty, Sanction or Enforcement Action Imposed⁴

Basis for Determination

Taking into consideration the Commission's direction in Order No. 693, the NERC Sanction Guidelines, the Commission's July 3, 2008 and October 26, 2009 Guidance Orders,⁵ the NERC BOTCC reviewed the Settlement Agreement and supporting documentation on June 10, 2010. The NERC BOTCC approved the Settlement Agreement, including SERC's assessment of a ten thousand dollar (\$10,000) financial penalty against CPW and other actions to facilitate future compliance required under the terms and conditions of the Settlement Agreement. In approving the Settlement Agreement, the NERC BOTCC reviewed the applicable requirements of the Commission-approved Reliability Standards and the underlying facts and circumstances of the violations at issue.

In reaching this determination, the NERC BOTCC considered the following factors:

1. the violations constituted CPW's first occurrence of violations of the subject NERC Reliability Standard;
2. SERC reported that CPW was cooperative throughout the compliance enforcement process;
3. the quality of CPW's compliance program, as discussed in the Disposition Document;
4. there was no evidence of any attempt to conceal a violation nor evidence of intent to do so;
5. SERC determined that the violations did not pose a serious or substantial risk to the reliability of the BPS, as discussed above and in the Disposition Document; and
6. SERC reported that there were no other mitigating or aggravating factors or extenuating circumstances that would affect the assessed penalty.

For the foregoing reasons, the NERC BOTCC approves the Settlement Agreement and believes that the assessed penalty of ten thousand dollars (\$10,000) is appropriate for the violation and

⁴ See 18 C.F.R § 39.7(d)(4).

⁵ *North American Electric Reliability Corporation*, "Guidance Order on Reliability Notices of Penalty," 124 FERC ¶ 61,015 (2008); *North American Electric Reliability Corporation*, "Further Guidance Order on Reliability Notices of Penalty," 129 FERC ¶ 61,069 (2009).

circumstances at issue, and is consistent with NERC's goal to promote and ensure reliability of the BPS.

Pursuant to 18 C.F.R. § 39.7(e), the penalty will be effective upon expiration of the 30 day period following the filing of this NOP with FERC, or, if FERC decides to review the penalty, upon final determination by FERC.

Attachments to be included as Part of this Notice of Penalty

The attachments to be included as part of this NOP are the following documents:

- a) CPW's Self-Report for CIP-001-1 R1-R4 dated October 1, 2009, included as Attachment a;
- b) Settlement Agreement by and between SERC and CPW executed February 18, 2010, included as Attachment b;
 - i. CPW's Mitigation Plan MIT-07-2150 for CIP-001-1 R1-R4 submitted October 1, 2009, included as Appendix A-1 to the Settlement Agreement;
 - ii. CPW's Certification of Completion of the Mitigation Plan for CIP-001-1 R1-R4 dated October 1, 2009, included as Appendix A-2 to the Settlement Agreement;
 - iii. SERC's Verification of Completion of the Mitigation Plan for CIP-001-1 R1-R4 dated October 7, 2009, included as Appendix A-3 to the Settlement Agreement;⁶
- c) Disposition Document included as Attachment c.

A Form of Notice Suitable for Publication⁷

A copy of a notice suitable for publication is included in Attachment d.

⁶ SERC accepted the Mitigation Plan on November 24, 2009, after it was verified complete because CPW submitted its Mitigation Plan, certified as complete, with its self-report and self-certification and SERC staff verified completion during its assessment of such violations on October 7, 2009.

⁷ See 18 C.F.R § 39.7(d)(6).

Notices and Communications

Notices and communications with respect to this filing may be addressed to the following:

<p>Gerald W. Cauley* President and Chief Executive Officer David N. Cook* Vice President and General Counsel North American Electric Reliability Corporation 116-390 Village Boulevard Princeton, NJ 08540-5721 (609) 452-8060 (609) 452-9550 – facsimile gerry.cauley@nerc.net david.cook@nerc.net</p> <p>Steve D. Reeves* General Manager Greenwood Commissioners of Public Works 121 West Court Avenue Greenwood, SC 29646 (864) 942-8105 (864) 942-8111 - facsimile sreeves@greenwoodcpw.com</p> <p>Jeffery D. Meredith* Director of Electric Utilities Greenwood Commissioners of Public Works 810 Highway 225 S Greenwood, SC 29646 (864) 942-8161 (864) 942-8136 - facsimile jmeredith@greenwoodcpw.com *Persons to be included on the Commission's service list are indicated with an asterisk. NERC requests waiver of the Commission's rules and regulations to permit the inclusion of more than two people on the service list.</p>	<p>Rebecca J. Michael* Assistant General Counsel Holly A. Hawkins* Attorney North American Electric Reliability Corporation 1120 G Street, N.W. Suite 990 Washington, DC 20005-3801 (202) 393-3998 (202) 393-3955 – facsimile rebecca.michael@nerc.net holly.hawkins@nerc.net</p> <p>R. Scott Henry* President and CEO SERC Reliability Corporation 2815 Coliseum Centre Drive, Suite 500 Charlotte, NC 28217 (704) 940-8202 (704) 357-7914 – facsimile shenry@serc1.org</p> <p>Marisa A. Sifontes* Interim Compliance Director and Legal Counsel Jacqueline E. Carmody* Contract Attorney SERC Reliability Corporation 2815 Coliseum Centre Drive, Suite 500 Charlotte, NC 28217 (704) 494-7775 (704) 357-7914 – facsimile msifontes@serc1.org jcarmody@serc1.org</p> <p>Kenneth B. Keels, Jr.* Manager of Compliance Enforcement SERC Reliability Corporation 2815 Coliseum Centre Drive, Suite 500 Charlotte, NC 28217 (704) 940-8214 (704) 357-7914 – facsimile kkeels@serc1.org</p>
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Conclusion

Accordingly, NERC respectfully requests that the Commission accept this NOP as compliant with its rules, regulations and orders.

Respectfully submitted,

Gerald W. Cauley
President and Chief Executive Officer
David N. Cook
Vice President and General Counsel
North American Electric Reliability Corporation
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/s/ Rebecca J. Michael
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holly.hawkins@nerc.net

cc: Greenwood Commissioners of Public Works
SERC Reliability Corporation

Attachments

Attachment a

**CPW's Self-Report for CIP-001-1 R1-R4 dated
October 1, 2009**



Non-Public and CONFIDENTIAL
(until filed with FERC)

Self-Reporting Form

Date Submitted by Registered Entity: 10/1/09

Region: SERC

NERC Registry ID: NCR01250

Joint Registration Organization (JRO) ID:

Registered Entity: Greenwood Commissioners of Public Works

Registered Entity Contact Name: Jeff Meredith

Registered Entity Contact Email: jmeredith@greenwoodcpw.com

Registered Entity Contact Telephone: 864-942-8161

Function(s) Applicable to Self-Report: LSE

Standard: CIP-001-1

Requirement: ALL

Has this possible alleged violation previously been reported or discovered: ☐ Yes ☒ No

If Yes selected: Provide NERC Violation ID (if known):

Date violation occurred: 08/01/2008 - 07/31/09

Date violation discovered: 09/14/09

Is the violation still occurring? ☐ Yes ☒ No

Detailed explanation and cause of violation: Formal documentation and training of employees and contact with FBI was not in place.

Reliability Impact: Select Reliability Impact Here

Reliability Impact Description:

Additional Comments: Greenwood CPW was made aware of these violations through review of their consultant and immediately took steps to mitigate any deficiencies in their procedure. Employees have been trained on CIP-001-1, contact has been made with the FBI, and formal procedures have been put in place to ensure that Greenwood meets the requirements of this standard.

NOTE: While submittal of a mitigation plan is not required until after a determination of a violation is confirmed, early submittal of a mitigation plan to address and remedy an identified deficiency is encouraged. Submittal of a mitigation plan shall not be deemed an admission of a violation. (See NERC Rules of Procedure, Appendix 4C, Section 6.4.)



Non-Public and CONFIDENTIAL
(until filed with FERC)

**SERC Staff will contact the person providing the report as soon as possible.
If you do not receive a response from SERC Staff within 2 business days please contact
the SERC office (704-357-7372).**

Please complete the form as completely as possible and email to serccomply@serc1.org.



Greenwood Commissioners of Public Works Compliance Certification Statement

Form Name	Form Title	Functions	Compliance	Due Date	Ready for Approval	Filing Period
CIP-001-1 Self Certification (LSE)	CIP-001-1 Self Certification (LSE)	LSE	Non-Compliant R1.,R2.,R3.,R4.	10/01/09	10/01/09	August 1, 2008 to July 31, 2009, 2009
BAL-005-0b Self Certification (LSE)	BAL-005-0b Self Certification (LSE)	LSE	Compliant	10/01/09	10/01/09	August 1, 2008 to July 31, 2009, 2009
EOP-002-2 Self Certification (LSE)	EOP-002-2 Self Certification (LSE)	LSE	Compliant	10/01/09	10/01/09	August 1, 2008 to July 31, 2009, 2009
EOP-004-1 Self Certification (LSE)	EOP-004-1 Self Certification (LSE)	LSE	Compliant	10/01/09	10/01/09	August 1, 2008 to July 31, 2009, 2009
IRO-001-1 Self Certification (LSE)	IRO-001-1 Self Certification (LSE)	LSE	Compliant	10/01/09	10/01/09	August 1, 2008 to July 31, 2009, 2009
IRO-004-1 Self Certification (LSE)	IRO-004-1 Self Certification (LSE)	LSE	Compliant	10/01/09	10/01/09	August 1, 2008 to July 31, 2009, 2009
IRO-005-1 Self Certification (LSE)	IRO-005-1 Self Certification (LSE)	LSE	Compliant	10/01/09	10/01/09	August 1, 2008 to January 21, 2009, 2009
IRO-005-2 Self Certification (LSE)	IRO-005-2 Self Certification (LSE)	LSE	Compliant	10/01/09	10/01/09	January 22, 2009 to July 31, 2009, 2009
TOP-001-1 Self Certification (DP)	TOP-001-1 Self Certification (DP)	DP	Compliant	10/01/09	10/01/09	August 1, 2008 to July 31, 2009, 2009
TOP-001-1 Self Certification (LSE)	TOP-001-1 Self Certification (LSE)	LSE	Compliant	10/01/09	10/01/09	August 1, 2008 to July 31, 2009, 2009
TOP-002-2 Self Certification (LSE)	TOP-002-2 Self Certification (LSE)	LSE	Compliant	10/01/09	10/01/09	August 1, 2008 to July 31, 2009, 2009

I certify the compliance information is accurate.

Jeff Meredith

October 01, 2009

Executive Signature

Date

Name: Jeff Meredith
Title: Director of Electric Utilities
Company: Greenwood Commissioners of Public Works
E-Mail: jmeredith@greenwoodcpw.com
Phone: 864-942-8161

Logged in as:

Jeff Meredith

Log Out

CIP-001-1 Self Certification (LSE) - August 1, 2008 to July 31, 2009

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New Mitigation Plan Attachments (0)

This form was marked as ready to be added to a certification statement on 10/1/2009.

* Required Fields

Status: Saved

Technical Contact

* Jeff Meredith (jmeredith@greenwoodcpw.com) Find Clear New Contact

Notice: Prior to submitting this self-certification form, you are directed to review the complete text of the applicable reliability standard (including interpretations) that is found at www.nerc.com. Each registered entity should evaluate its compliance with the official standard in preparing this filing.

Evidence must be retained to support the responses to this Self-Certification, including any follow-up investigation, until the completion of the next scheduled audit, unless the NERC or Regional Entity advises otherwise.

SERC will disclose this information to NERC and other third parties, only as required, and in accordance with established procedures pursuant to section 1500 of the NERC rules of procedure.

This self-certification covers the Reporting Period for August 1, 2008 to July 31, 2009. The response to the certification should accurately reflect the entity's compliance status for the entire Reporting Period.

Applicable Function: LSE

As an authorized representative of **Greenwood Commissioners of Public Works**, I certify the following:

1. **Greenwood Commissioners of Public Works** was in Compliance with the NERC Reliability Standard CIP-001-1 for the entire Reporting Period.
2. **Greenwood Commissioners of Public Works** is Not in Compliance for a portion of or the entire Reporting Period with the following requirement(s) of NERC Reliability Standard CIP-001-1 (indicated by checkmark) but was in compliance with all other requirements of the standard for the entire Reporting Period.
 - ☒ **Greenwood Commissioners of Public Works** is indicating a possible violation that has **not** been previously identified to SERC Reliability Corporation.
 - ☒ **Greenwood Commissioners of Public Works** is indicating a possible violation that was **previously identified to SERC Reliability Corporation**. Provide issues tracking number, if known.

Check all requirements for which Greenwood Commissioners of Public Works was Not in Compliance for a portion of or the entire Reporting Period:

- ☒ **R1. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection.**

NOTE: While submittal of a mitigation plan is not required until after a determination of a violation is confirmed, early submittal of a mitigation plan to address and remedy an identified deficiency is encouraged. Submittal of a mitigation plan shall not be deemed an admission of a violation. (See NERC Rules of Procedure, Appendix 4C, Section 6.4.)

Provide a detailed explanation why this was not accomplished

Greenwood CPW did not realize that the standard applied to

them because Greenwood has no critical assets. Upon review of compliance requirements by Greenwood's consultant, it was determined that the standard does in fact apply to Greenwood even though Greenwood has no critical assets.

Enter date of alleged violation

7/31/2009 ▼

Enter time of alleged violation

hh:mm:ss

- ⓑ **R2.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.

NOTE: While submittal of a mitigation plan is not required until after a determination of a violation is confirmed, early submittal of a mitigation plan to address and remedy an identified deficiency is encouraged. Submittal of a mitigation plan shall not be deemed an admission of a violation. (See NERC Rules of Procedure, Appendix 4C, Section 6.4.)

Provide a detailed explanation why this was not accomplished

Greenwood CPW did not realize that the standard applied to them because Greenwood has no critical assets. Upon review of compliance requirements by Greenwood's consultant, it was determined that the standard does in fact apply to Greenwood even though Greenwood has no critical assets.

Enter date of alleged violation

7/31/2009 ▼

Enter time of alleged violation

hh:mm:ss

- ⓑ **R3.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.

NOTE: While submittal of a mitigation plan is not required until after a determination of a violation is confirmed, early submittal of a mitigation plan to address and remedy an identified deficiency is encouraged. Submittal of a mitigation plan shall not be deemed an admission of a violation. (See NERC Rules of Procedure, Appendix 4C, Section 6.4.)

Provide a detailed explanation why this was not accomplished

Greenwood CPW did not realize that the standard applied to them because Greenwood has no critical assets. Upon review of compliance requirements by Greenwood's consultant, it was determined that the standard does in fact apply to Greenwood even though Greenwood has no critical assets.

Enter date of alleged violation

7/31/2009 ▼

Enter time of alleged violation

hh:mm:ss

- ⓑ **R4.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and develop reporting procedures as appropriate to their circumstances.

NOTE: While submittal of a mitigation plan is not required until after a determination of a violation is confirmed, early submittal of a mitigation plan to address and remedy an identified deficiency is encouraged. Submittal of a mitigation plan shall not be deemed an admission of a violation. (See NERC Rules of Procedure, Appendix 4C, Section 6.4.)

Provide a detailed explanation why this was not accomplished

Greenwood CPW did not realize that the standard applied to them because Greenwood has no critical assets. Upon review of compliance requirements by Greenwood's consultant, it was determined that the standard does in fact apply to Greenwood even though Greenwood has no critical assets.

Enter date of alleged violation

7/31/2009 

Enter time of alleged violation

hh:mm:ss

3. The NERC Reliability Standard CIP-001-1 **does not** apply to **Greenwood Commissioners of Public Works** because

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Attachment b

Settlement Agreement by and between SERC and CPW executed February 18, 2010

SETTLEMENT AGREEMENT

OF

SERC RELIABILITY CORPORATION

AND

GREENWOOD COMMISSIONERS of PUBLIC WORKS

I. INTRODUCTION

1. SERC Reliability Corporation (“SERC”) and Greenwood Commissioners of Public Works (“CPW”) enter into this Settlement Agreement (“Settlement Agreement”) to resolve all outstanding issues arising from a preliminary and non-public assessment resulting in SERC’s determination and findings, pursuant to the North American Electric Reliability Corporation (“NERC”) Rules of Procedure, of four alleged violations by CPW of NERC Reliability Standard CIP-001-1, Requirements (R)1 through 4 (SERC Tracking Nos. 09-094, 09-095, 09-096, and 09-097, NERC Violation ID Nos. SERC200900333, SERC200900334, SERC200900335, and SERC200900336).

II. STIPULATION

2. The facts stipulated herein are stipulated solely for the purpose of resolving, between CPW and SERC, the matters discussed herein and do not constitute stipulations or admissions for any other purpose. CPW and SERC hereby stipulate and agree to the following:

Background

3. Founded in 1896, Greenwood Commissioners of Public Works is a municipality that provides electric service to the businesses and citizens of Greenwood, SC. CPW’s distribution system operates primarily within the corporate limits of the City of Greenwood, distributing power to more than 10,000 customers. CPW has 6 sub-stations (2 at 100 kV), 21 circuits (6 at 100 kV), and approximately 180 miles of line.
4. CPW is currently listed on the NERC Compliance Registry as a Distribution Provider (DP) and Load Serving Entity (LSE). (NCR01250). CPW’s LSE function is at issue in these violations and this settlement.

Alleged Violations

Alleged Violations of NERC Reliability Standard CIP-001-1, Requirements 1 through 4

5. The purpose of NERC Reliability Standard CIP-001-1 is to ensure that disturbances or unusual occurrences, suspected or determined to be caused by sabotage are reported to the appropriate systems, governmental agencies, and regulatory bodies.
6. NERC Reliability Standard CIP-001-1, Requirement 1 requires, in part, that each Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity have “procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities...”¹
7. NERC Reliability Standard CIP-001-1, Requirement 2 requires that each Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity have “procedures for the communication of information concerning sabotage events to the appropriate parties in the Interconnection.”²
8. NERC Reliability Standard CIP-001-1, Requirement 3 requires that each Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity “provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.”³
9. NERC Reliability Standard CIP-001-1, Requirement 4 requires that each Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity have established communications contacts with the local Federal Bureau of Investigations (FBI) officials and have developed the appropriate reporting procedures.⁴
10. On October 1, 2009, CPW submitted a self-report and a self-certification form stating that it did not have procedures and guidelines to comply with NERC Reliability Standard CIP-001-1. CPW reported through its self-certification and self-report that it did not realize that the standard applied because CPW has no critical

¹ NERC Standard CIP-001-1 –Sabotage Reporting, approved by NERC Board of Trustees on November 1, 2006, approved by FERC effective June 18, 2007.

² Id.

³ Id.

⁴ Id.

assets. CPW further stated that upon review of the NERC compliance requirements by its consultant, CPW determined that the standard did apply.

11. After confirming CPW's registration status, SERC Staff commenced its detailed compliance assessment. On October, 7, 2009, SERC Staff issued to CPW a Compliance Assessment Notice advising CPW of the initiation of a formal assessment to determine, in part, its compliance relative to NERC Reliability Standard CIP-001-1, R 1-4 and directing CPW to preserve all relevant records and information. SERC Staff promptly established direct contact with representatives of CPW to begin the process of gathering information and documentation for the detailed compliance assessment. SERC Staff also reported the possible violations to NERC on October 7, 2009, which, in turn, reported the possible violations to the Commission in accordance with the CMEP of the NERC Rules of Procedure.
12. In its self-certification submittals in 2007 and 2008, CPW marked as "Not Applicable" each of the NERC Reliability Standard requirements to which it was required to certify, based upon its registration status. In the required field for the explanation of the "Not Applicable" submittal, CPW stated that it did not meet the criteria for registration. In late 2008, SERC Staff initiated a series of follow-up inquiries regarding CPW's "Not Applicable" filings and advised CPW that such filings were not acceptable, since CPW was properly registered for the functions to which the NERC Reliability Standards were in fact applicable. CPW requested SERC reconsider CPW's registration and provided information, including one-line diagrams for SERC Staff's review. Upon review of CPW's one-line diagrams, SERC Staff confirmed via letter dated March 23, 2009 that CPW was properly registered as a Distribution Provider and Load-Serving Entity and was therefore required to comply with the applicable NERC Reliability Standards, including NERC Reliability Standard CIP-001-1. SERC Staff and CPW then met on May 8, 2009 to discuss the basis for SERC Staff's determination. After additional discussions with other regions, NERC, and a peer-review panel; and based on its review of the evidence, SERC staff reaffirmed its determination that CPW is a user of the bulk power system and meets the criteria to be registered as a Distribution Provider and Load-Serving Entity as defined by NERC and as set forth in the NERC Statement of Compliance Registry Criteria (Revision 5.0), which has been approved by the Commission.
13. CPW did not have formal documentation, procedures or guidelines in place for addressing sabotage events, nor did CPW establish communications contacts with the local Federal Bureau of Investigation (FBI), therefore there was no evidence for SERC Staff to review.
14. As a result of its assessment, SERC Staff concluded that the facts and evidence supported a finding that CPW violated R 1, 2, 3 and 4 of NERC Reliability Standard CIP-001-1 because the evidence reviewed showed that CPW (a) did not have written

procedural content that described how to recognize a sabotage event, and at what stage in the process operating personnel are made aware of the event (b) did not have procedures for the communication of sabotage information to appropriate parties in the interconnection, (c) had not provided its operating personnel with sabotage response guidelines, and (d) did not have written or electronic evidence of reporting procedures for coordination between local FBI and CPW facilities. R 1, 2, 3 and 4 of NERC Reliability Standard CIP-001-1 are each assigned a Violation Risk Factor (“VRF”) of “Medium,” consistent with the VRFs filed by NERC and approved by the Commission. SERC Staff further concluded that the actual and foreseeable impact of the alleged violations was minimal and did not pose a serious or substantial risk to the reliability of the Bulk Power System as there had been no reported sabotage event, and if there had been a sabotage event on CPW’s system, the impact would have been minimal, as the total load of CPW is less than 75 MW and is connected via radial connection.

15. On November 13, 2009, CPW formally requested settlement discussions for the resolution of the alleged violations.

III. PARTIES’ SEPARATE REPRESENTATIONS

Statement of SERC and Summary of Findings

16. SERC finds that beginning on June 18, 2007 and continuing until September 30, 2009, the date CPW completed the tasks and actions to correct the alleged violation pursuant to its Mitigation Plan, CPW, as Load Serving Entity did not have a written procedure that described how to recognize a sabotage event, and at what stage in the process operating personnel are made aware of the event. This is a violation of NERC Reliability Standard CIP-001-1, R1, for failing to have a procedure with content for recognizing sabotage events.
17. SERC finds that beginning on June 18, 2007 and continuing until September 30, 2009, the date CPW completed the tasks and actions to correct the alleged violation pursuant to its Mitigation Plan, CPW, as a Load Serving Entity, failed to have procedures for the communication of information concerning sabotage events to appropriate parties in the interconnection. This is a violation of NERC Reliability Standard CIP-001-1, R2, for failing to have appropriate communication procedures in place.
18. SERC finds that beginning on June 18, 2007 and continuing until September 30, 2009, the date CPW completed the tasks and actions to correct the alleged violation pursuant to its Mitigation Plan, CPW, as a Load Serving Entity, failed to provide its operating personnel with sabotage response guidelines. This is a violation of NERC Reliability Standard CIP-001-1, R3, for failing to have made sabotage response guidelines available to operating personnel.

19. SERC finds that beginning on June 18, 2007 and continuing until September 30 2009, the date CPW completed the tasks and actions to correct the alleged violation pursuant to its Mitigation Plan, CPW, as a Load Serving Entity, did not have evidence of proper reporting procedures for coordination between local FBI and CPW facilities. Entity did not establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) officials and develop reporting procedures as appropriate to their circumstances which is a violation of NERC Reliability Standard CIP-001-1 R4.
20. SERC Staff concluded that the actual or foreseeable impact of the alleged violations on the reliability of the bulk power system was minimal, as discussed above.
21. SERC agrees that this Settlement Agreement is in the best interest of the parties and in the best interest of bulk power system reliability.

Statement of CPW

22. CPW admits that the facts set forth and agreed to by the parties for purposes of this Agreement constitute violations of NERC Reliability Standard CIP-001-1.
23. CPW has agreed to enter into this Settlement Agreement with SERC to avoid extended litigation with respect to the matters described or referred to herein, to avoid uncertainty, and to effectuate a complete and final resolution of the issues set forth herein. CPW agrees that this agreement is in the best interest of the parties and in the best interest of maintaining a reliable electric infrastructure.
24. CPW's compliance program covers all reliability standards applicable to the functions for which they are registered. Although CPW does not have a formal compliance department, ownership of the NERC Reliability Standards are assigned to appropriate personnel within the organization. The Chief Financial Officer (CFO) is responsible for the implementation of the compliance program, the Director of Electric Utilities is responsible for the day-to-day compliance with all NERC Reliability Standards and the General Manager has overall responsibility for the NERC Reliability Standards. The CFO reports directly to the General Manager and can directly report NERC Reliability Standards issues to the Board of Commissioners.

IV. MITIGATING ACTIONS, REMEDIES AND SANCTIONS

25. CPW's Mitigation Plan MIT-07-2150 for NERC Reliability Standard CIP-001-1, R1 through R4 dated October 1, 2009, was accepted by SERC on November 24, 2009 and submitted to NERC for its approval on November 30, 2009. It was approved by NERC on December 1, 2009 and submitted to FERC on December 2, 2009. CPW's

Mitigation Plan was completed on September 30, 2009. CPW certified its completion on October 1, 2009 and SERC verified CPW's completion on October 7, 2009. CPW's Mitigation Plan MIT-07-2150 is attached as Appendix A-1. Its Certification of Mitigation Plan Completion is attached hereto as Appendix A-2, and the Statement of SERC Compliance Staff Regarding Completion of CPW's Mitigation Plan MIT-07-2150 is attached hereto as Appendix A-3.

26. Actions implemented by CPW in Mitigation Plan MIT-07-2150 resolved the gap in compliance and will help to prevent a recurrence of any similar alleged violation. Formal procedures were developed and approved by CPW's General Manager on September 25, 2009 to meet the requirements of R1, R2 and R3. Formal CIP-001-1 training was provided to employees on September 30, 2009. Communication was established with the local FBI office for reporting sabotage events on September 18, 2009 to meet requirement R4.
27. SERC Staff has reviewed the preventative measures described in the Mitigation Plan and has determined that these measures will assist CPW in improving prospective compliance with NERC Reliability Standard CIP-001-1, and will enhance the reliability of the bulk power system.
28. To verify completion of CPW's Mitigation Plan, SERC reviewed:
 - i. CPW CIP Compliance Manual, Version 1 dated September 22, 2009 for evidence of compliance with R1, R2, R3, and R4.
 - ii. CPW's PowerPoint presentation of CIP-001- Sabotage Reporting Training and copies of training certificates as further evidence of compliance with R3.
 - iii. CPW's email with FBI contact information dated September 18, 2009, letter sent via certified mail to the FBI dated September 21, 2009, and a copy of the certified mail receipt as further evidence of compliance with R4.
29. SERC Staff also considered the specific facts and circumstances of the violations and CPW's actions in response to each alleged violation in determining a proposed penalty that meets the requirement in Section 215 of the Federal Power Act that "[a]ny penalty imposed under this section shall bear a reasonable relation to the seriousness of the violation and shall take into consideration the efforts of [CPW] to remedy the violation in a timely manner."⁵ The factors considered by SERC Staff in

⁵ 16 U.S.C. § 824o(e)(6).

the determination of the appropriate penalty for CPW's alleged violations of NERC Reliability Standard CIP-001-1 pursuant to this Settlement Agreement included the following:

- a. CPW has no prior violations of this Standard or any closely-related standard during the mandatory reliability period.
 - b. CPW cooperated in both a timely and satisfactory manner with SERC Staff during the investigation.⁶ CPW provided prompt responses to all of SERC Staff's data requests and cooperated with SERC Staff during meetings between the parties to discuss these events. CPW's response to SERC Staff's questions enabled SERC Staff to conduct its investigation in an efficient manner.
 - c. CPW agreed to resolve this issue via settlement and promptly initiated various mitigation and preventative measures before receiving a Notice of Alleged Violation from SERC.
 - d. CPW has admitted the violations.
 - e. As described above, CPW has implemented specific measures to address the alleged violations and to protect against future violations of the same or similar requirements.
30. SERC and CPW agree that in addition to the actions taken in CPW's Mitigation Plans, CPW will take the following actions:
- a. Provide CPW's CIP-001- Sabotage Reporting Training to the field staff of CPW's water and gas department, which is comprised of 24 of employees in the water department and 33 of employees in the gas department, within three months of the execution of this agreement.
 - b. Incorporate annual CIP-001- Sabotage Reporting Training in the training program for CPW's gas and water departments beginning in 2010.
 - c. Provide general training on the non-CIP NERC Reliability Standards applicable to the functions for which CPW is registered to the field staff of CPW's electric department within three months of the execution of this agreement. The training will include the standards listed in the attached document.
 - d. Incorporate annual general non-CIP NERC Reliability Standards training in the training program for CPW's electric department beginning in 2010.
31. Based on the above factors, as well as the mitigation actions and preventative measures taken, CPW shall pay \$10,000 to SERC as set forth in this Settlement Agreement. CPW shall remit the payment to SERC via check, or by wire transfer to

⁶ Revised Policy Statement on Enforcement, 123 FERC ¶ 61,156, P 65 (May 15, 2008).

an account to be identified by SERC ("SERC Account"), within twenty days after SERC provides CPW with a notice of penalty payment due and invoice, to be issued by SERC after this Settlement Agreement is either approved by the Commission or by operation of law. SERC shall notify NERC, and NERC shall notify the Commission, if the payment is not timely received. If CPW does not remit the payment by the required date, interest payable to SERC will begin to accrue pursuant to the Commission's regulations at 18 C.F.R. §35.19a(a)(2)(iii) from the date that payment is due, and shall be payable in addition to the payment.

32. Failure to make a timely penalty payment or to comply with any of the terms and conditions agreed to herein, or any other conditions of this Settlement Agreement, may subject CPW to new or additional enforcement, penalty or sanction actions in accordance with the NERC Rules of Procedure. CPW will retain all rights to defend against such enforcement actions in accordance with the NERC Rules of Procedure.

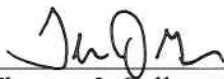
V. ADDITIONAL TERMS

33. The signatories to the Settlement Agreement agree that they enter into the Settlement Agreement voluntarily and that, other than the recitations set forth herein, no tender, offer or promise of any kind by any member, employee, officer, director, agent or representative of SERC or CPW has been made to induce the signatories or any other party to enter into the Settlement Agreement. The signatories agree that the terms and conditions of this Settlement Agreement are consistent with the Commission's regulations and orders, and NERC's Rules of Procedure.
34. SERC shall report the terms of all settlements of compliance matters to NERC. NERC will review the settlement for the purpose of evaluating its consistency with other settlements entered into for similar violations or under other, similar circumstances. Based on this review, NERC will either approve the settlement or reject the settlement and notify SERC and CPW of changes to the settlement that would result in approval. If NERC rejects the settlement, NERC will provide specific written reasons for such rejection and SERC will attempt to negotiate a revised settlement agreement with CPW including any changes to the settlement specified by NERC. If a settlement cannot be reached, the enforcement process shall continue to conclusion. If NERC approves the settlement, NERC will (i) report the approved settlement to the Commission for the Commission's review and approval by order or operation of law and (ii) publicly post this Settlement Agreement.
35. This Settlement Agreement shall become effective upon the Commission's approval of the Settlement Agreement by order or operation of law as submitted to it or as modified in a manner acceptable to the parties.

36. CPW agrees that this Settlement Agreement, when approved by NERC and the Commission, shall represent a final settlement of all matters set forth herein and CPW waives its right to further hearings and appeal, unless and only to the extent that CPW contends that any NERC or Commission action on the Settlement Agreement contains one or more material modifications to the Settlement Agreement. SERC reserves all rights to initiate enforcement, penalty or sanction actions against CPW in accordance with the NERC Rules of Procedure in the event that CPW fails to comply with the mitigation plan or complete the additional actions agreed to in this Settlement Agreement. In the event CPW fails to comply with any of the stipulations, remedies, sanctions or additional terms, as set forth in this Settlement Agreement, SERC will initiate enforcement, penalty, or sanction actions against CPW to the maximum extent allowed by the NERC Rules of Procedure, up to the maximum statutorily allowed penalty. Except as otherwise specified in this Settlement Agreement, CPW shall retain all rights to defend against such enforcement actions, also according to the NERC Rules of Procedure.
37. CPW consents to the use of SERC's determinations, findings, and conclusions set forth in this Agreement for the purpose of assessing the factors, including the factor of determining the company's history of violations, in accordance with the NERC Sanction Guidelines and applicable Commission orders and policy statements. Such use may be in any enforcement action or compliance proceeding undertaken by NERC and/or any Regional Entity; provided, however, that CPW does not consent to the use of the specific acts set forth in this Agreement as the sole basis for any other action or proceeding brought by NERC and/or SERC, nor does CPW consent to the use of this Agreement by any other party in any other action or proceeding.
38. Each of the undersigned warrants that he or she is an authorized representative of the entity designated, is authorized to bind such entity and accepts the Settlement Agreement on the entity's behalf.
39. The undersigned representative of each party affirms that he or she has read the Settlement Agreement, that all of the matters set forth in the Settlement Agreement are true and correct to the best of his or her knowledge, information and belief, and that he or she understands that the Settlement Agreement is entered into by such party in express reliance on those representations, provided, however, that such affirmation by each party's representative shall not apply to the other party's statements of position set forth in Section III of this Settlement Agreement.
40. The Settlement Agreement may be signed in counterparts.
41. This Settlement Agreement is executed in duplicate, each of which so executed shall be deemed to be an original.

***Remainder of page intentionally blank.
Signatures to be affixed to the following page.***

Agreed to and accepted:



Thomas J. Galloway
Interim President and CEO
SERC RELIABILITY CORPORATION



Date



Steve D. Reeves
General Manager
GREENWOOD COMMISSIONERS of PUBLIC WORKS



Date

**APPENDIX A
TO
SETTLEMENT AGREEMENT
OF
SERC RELIABILITY CORPORATION
AND
GREENWOOD COMMISSIONERS of PUBLIC WORKS**

- (1) CPW's Mitigation Plan for CIP-001-1, R1-4**
- (2) CPW's Certification of Mitigation Plan Completion for CIP-001-1, R1-4**
- (3) Statement of SERC Reliability Corporation Compliance Staff Regarding
Completion of CPW's Mitigation Plan for CIP-001-1, R1-4**



Rev 0 - submitted
10/01/09
09-094 - 09-097

Mitigation Plan Submittal Form

Please refer to
SERC Guidelines for Mitigation Plan Submission.pdf available at
<http://www.serc1.org/Application/ContentPageView.aspx?ContentId=22>

Date this Mitigation Plan is being submitted: 10/01/2009

If this Mitigation Plan has already been completed:

- Check this box ☒ and
- Provide the Date of Completion of the Mitigation Plan: 09/30/2009

Section A: Compliance Notices

- Section 6.2 of the CMEP¹ sets forth the information that must be included in a Mitigation Plan. The Mitigation Plan must include:
 - (1) The Registered Entity's point of contact for the Mitigation Plan, who shall be a person (i) responsible for filing the Mitigation Plan, (ii) technically knowledgeable regarding the Mitigation Plan, and (iii) authorized and competent to respond to questions regarding the status of the Mitigation Plan. This person may be the Registered Entity's point of contact described in Section 2.0.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date

¹ "Uniform Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation;" a copy of the current version approved by the Federal Energy Regulatory Commission is posted on NERC's website.



of submission. Additional violations could be determined for not completing work associated with accepted milestones.

- (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self-Certification or Self Reporting submittals.
- This submittal form shall be used to provide a required Mitigation Plan for review and approval by SERC and NERC.
 - The Mitigation Plan shall be submitted to SERC and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related violations of one Reliability Standard. A separate mitigation plan is required to address violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is approved by SERC and NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission in accordance with applicable Commission rules, regulations and orders.
 - SERC or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.

Section B: Registered Entity Information

B.1 Identify your organization:

Company Name: Greenwood Commissioners of Public Works
Company Address: 121 W. Court Ave. Greenwood, SC 29646
NERC Compliance Registry ID *[if known]*: NCR01250

B.2 Identify the individual in your organization who will serve as the Contact to SERC regarding this Mitigation Plan. This person shall be technically knowledgeable regarding this Mitigation Plan and authorized to respond to SERC regarding this Mitigation Plan.

Name: Jeff Meredith
Title: Director Of Electric Utilities
Email: jmeredith@greenwoodcpw.com
Phone: 864-942-8161



Section C: Identity of Reliability Standard Violations Associated with this Mitigation Plan

This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

C.1 Standard: CIP-001-1
[Identify by Standard Acronym (e.g. FAC-001-1)]

C.2 Requirement(s) violated and violation dates:
[Enter information in the following Table]

NERC Violation ID # [if known]	SERC Violation ID # [if known]	Requirement Violated (e.g. R3.2)	Violation Date ^(*)
SERCYYYYnnnnn	YYYY-nnn	R1	10/01/2009
		R2	10/01/2009
		R3	10/01/2009
		R4	10/01/2009

(*) Note: The Violation Date shall be: (i) the date that the violation occurred; (ii) the date that the violation was self-reported; or (iii) the date that the violation has been deemed to have occurred on by SERC. Questions regarding the date to use should be directed to SERC.

C.3 Identify the cause of the violation(s) identified above:

Formal procedures and training of employees was not in place as required by R1, R2, and R3. Documented contact with the FBI was not in place as required by R4.

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

C.4 **[Optional]** Provide any relevant additional information regarding the violations associated with this Mitigation Plan:

[Provide your response here; additional detailed information may be provided as an attachment as necessary]



Section D: Details of Proposed Mitigation Plan

Mitigation Plan Contents

- D.1 Identify and describe the action plan, including specific tasks and actions that your organization is proposing to undertake, or which it undertook if this Mitigation Plan has been completed, to correct the violations identified above in Part C.2 of this form:

Formal procedures were developed and approved by the General Manager on 09/25/2009 to meet the requirements of R1, R2 and R3. Formal NERC CIP-001-1 training was provided to employees on 09/30/2009 by Abidance Consulting in accordance with the NERC approved training course. Communication was established with the local FBI office for reporting sabotage events on 09/18/2009 to meet requirement R4.
[Provide your response here; additional detailed information may be provided as an attachment as necessary]

Check this box ☒ and proceed to Section E of this form if this Mitigation Plan, as set forth in Part D.1, has already been completed; otherwise respond to Part D.2, D.3 and, optionally, Part D.4, below.

Mitigation Plan Timeline and Milestones

- D.2 Provide the timetable for completion of the Mitigation Plan, including the completion date by which the Mitigation Plan will be fully implemented and the violations associated with this Mitigation Plan are corrected:
- D.3 Enter Milestone Activities, with completion dates, that your organization is proposing for this Mitigation Plan:

Milestone Activity	Proposed Completion Date* (shall not be more than 3 months apart)

(*) Note: Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.



[Note: Provide your response here; additional detailed information may be provided as an attachment as necessary]



Additional Relevant Information (Optional)

- D.4 If you have any relevant additional information that you wish to include regarding the mitigation plan, milestones, milestones dates and completion date proposed above you may include it here:

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

Section E: Interim and Future Reliability Risk

Check this box ☒ and proceed and respond to Part E.2 and E.3, below, if this Mitigation Plan, as set forth in Part D.1, has already been completed.

Abatement of Interim BPS Reliability Risk

- E.1 While your organization is implementing the Mitigation Plan proposed in Part D of this form, the reliability of the Bulk Power System may remain at higher risk or be otherwise negatively impacted until the plan is successfully completed. To the extent they are, or may be, known or anticipated: (i) identify any such risks or impacts; and (ii) discuss any actions that your organization is planning to take or is proposing as part of the Mitigation Plan to mitigate any increased risk to the reliability of the bulk power system while the Mitigation Plan is being implemented:

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

Prevention of Future BPS Reliability Risk

- E.2 Describe how successful completion of the Mitigation Plan as laid out in Part D of this form will prevent or minimize the probability that your organization incurs further violations of the same or similar reliability standards requirements in the future:

The procedures that have been put in place require annual training of employees and contact with the local and FBI officials to ensure that they are still the correct points of contact. Pursuant to the revised Greenwood ICP, all procedures will be audited at least annually to verify that the appropriate



procedures are followed.

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

- E.3 Your organization may be taking or planning other action, beyond that listed in the Mitigation Plan, as proposed in Part D.1, to prevent or minimize the probability of incurring further violations of the same or similar standards requirements listed in Part C.2, or of other reliability standards. If so, identify and describe any such action, including milestones and completion dates:

No other action is planned at this time.

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

[Continued on Next Page](#)



Section F: Authorization

An authorized individual must sign and date this Mitigation Plan Submittal Form. By doing so, this individual, on behalf of your organization:

- a) Submits the Mitigation Plan, as laid out in Section D of this form, to SERC for acceptance by SERC and approval by NERC, and
- b) If applicable, certifies that the Mitigation Plan, as laid out in Section D of this form, was completed (i) as laid out in Section D of this form and (ii) on or before the date provided as the 'Date of Completion of the Mitigation Plan' on this form, and
- c) Acknowledges:
 1. I am the Director of Electric Utilities of Greenwood Commissioners of Public Works.
 2. I am qualified to sign this Mitigation Plan on behalf of Greenwood Commissioners of Public Works.
 3. I have read and understand Greenwood Commissioners of Public Works obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure, including Appendix 4(C) (Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation" (NERC CMEP)).
 4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
 5. Greenwood Commissioners of Public Works agrees to be bound by, and comply with, the Mitigation Plan, including the timetable completion date, as approved by SERC and approved by NERC.

Authorized Individual Signature /s/ Jeffery D. Meredith
 (Electronic signatures are acceptable; see CMEP)

Name (Print): Jeff Meredith
 Title: Director of Electric Utilities
 Date: 10/01/2009



Section G: Comments and Additional Information

You may use this area to provide comments or any additional relevant information not previously addressed in this form.

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

Submittal Instructions:

Please convert the completed and signed document to a text-searchable Adobe .pdf document using the following naming convention:

[(MP Entity Name (STD-XXX) MM-DD-YY).pdf]

Email the pdf file to serccomply@serc1.org.

Please direct any questions regarding completion of this form to:

Ken Keels
Manager, Compliance Enforcement
SERC Reliability Corporation
704-357-7372
kkeels@serc1.org



09-094 - 09-097

COMMISSIONERS OF PUBLIC WORKS

COMMISSIONERS: GENE P. HANCOCK, MICHAEL G. MONAGHAN, HENRY O. WATTS
MANAGER: STEVE D. REEVES, JR.

Certification of a Completed Mitigation Plan

SERC Reliability Corporation Violation Mitigation Plan Closure Form

Name of Registered Entity submitting certification: [Greenwood Commissioners of Public Works](#)

Date of Certification: [10/01/2009](#)

Name of Standard and the Requirement(s) of mitigated violation(s): [CIP-001-1 R1,R2,R3,R4](#)

SERC Tracking Number (contact SERC if not known):

NERC Violation ID Number (if assigned):

Date of completion of the Mitigation Plan: [09/30/2009](#)

Summary of all actions described in Part D of the relevant mitigation plan: [Formal procedures were developed and approved by the General Manager on 09/25/2009 to meet the requirements of R1, R2 and R3. Formal NERC CIP-001-1 training was provided to employees on 09/30/2009 by Abidance Consulting in accordance with the NERC approved training course. Communication was established with the local FBI office for reporting sabotage events on 09/18/2009 to meet requirement R4.](#)

Description of the information provided to SERC for their evaluation: [Greenwood CPW is submitting the approved procedure for compliance to CIP-001-1 along with documentation verifying contact with the FBI. Greenwood is also supplying the training certificates documenting that affected employees have received the required CIP-001-1 training as required by NERC.](#)



COMMISSIONERS OF PUBLIC WORKS

COMMISSIONERS: GENE P. HANCOCK, MICHAEL G. MONAGHAN, HENRY O. WATTS
MANAGER: STEVE D. REEVES, JR.

I certify that the mitigation plan for the above-named violation has been completed on the date shown above. In doing so, I certify that all required mitigation plan actions described in Part D of the relevant mitigation plan have been completed, compliance has been restored, the above-named entity is currently compliant with all of the requirements of the referenced standard, and that all information submitted information is complete and correct to the best of my knowledge.

Name: [Jeff Meredith](#)
Title: [Director of Electric Utilities](#)
Entity: [Greenwood Commissioners of Public Works](#)
Email: jmeredith@greenwoodcpw.com
Phone: [864-942-8161](tel:864-942-8161)

Designated Signature /s/ Jeffery D. Meredith Date 10/01/2009



Statement of SERC Reliability Corporation Compliance Staff Regarding Completion of Mitigation Plan

Registered Entity: Greenwood Commissioners of Public Works
SERC Tracking ID: 09-094 through 09-097
NERC Violation No: SERC200900333, SERC200900334, SERC200900335,
SERC200900336
NERC Mitigation Plan ID: MIT-07-2150
Standard: CIP-001-1
Requirement(s): R1, R2, R3 and R4

Violation Summary:

Entity does not have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities which is a violation of CIP-001-1 R1. This violation has endured from June 18, 2007 until mitigated on September 30, 2009.

Entity does not have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection which is a violation of CIP-001-1 R2. This violation has endured from June 18, 2007 until mitigated on September 30, 2009.

Entity did not provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events which is a violation of CIP-001-1 R3. This violation has endured from June 18, 2007 until mitigated on September 30, 2009.

Entity did not establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) officials and develop reporting procedures as appropriate to their circumstances which is a violation of CIP-001-1 R4. This violation has endured from June 18, 2007 until mitigated on September 30, 2009.

Mitigation Plan Summary:

Greenwood Commissioners of Public Works' Mitigation Plan to address the referenced violation was submitted on 10/01/09 and was accepted by SERC on 11/24/09 and approved by NERC on 12/1/2009. The Mitigation Plan is identified as MIT-07-2150 and was submitted as non-public information to FERC on 12/2/2009 in accordance with FERC orders.



Formal procedures were developed and approved by Entity's General Manager on 09/25/2009 to meet the requirements of R1, R2 and R3. Formal NERC CIP-001-1 training was provided to employees on 09/30/2009 by Consultant in accordance with the NERC approved training course. Communication was established with the local FBI office for reporting sabotage events on 09/18/2009 to meet requirement R4. Mitigation Plan was completed on 9/30/09.

SERC's Monitoring of Registered Entity's Mitigation Plan Progress:

SERC Reliability Corporation Compliance Staff ("SERC Staff") monitors the Registered Entity's progress towards completion of its Mitigation Plans in accordance with Section 6.0 of the uniform Compliance Monitoring and Enforcement Program, ("CMEP"). Pursuant to the CMEP, Registered Entities are required to establish implementation milestones no more than three (3) months apart. SERC Staff solicits quarterly reports from all Registered Entities with open mitigation plans to monitor the progress on completion of milestones. SERC Staff also produces and reviews daily Mitigation Plan status reports highlighting Mitigation Plans that are nearing the scheduled completion date. If the Registered Entity fails to complete its Mitigation Plan according to schedule, appropriate additional enforcement action is initiated to assure compliance is attained.

In this case, Greenwood Commissioners of Public Works submitted the Mitigation Plan as complete and no additional monitoring of progress was necessary.

Mitigation Plan Completion Review Process:

Greenwood Commissioners of Public Works certified on 10/01/09 that the subject Mitigation Plan was completed on 09/30/09. A SERC compliance staff member reviewed the evidence submitted in a manner similar to a compliance audit. That action was followed by another compliance staff member's peer review of the initial conclusion.

Evidence Reviewed:

Greenwood Commissioners of Public Works submitted and SERC Staff reviewed the following evidence in support of its certification that its Mitigation Plan was completed in accordance with its terms:

1. GCPW-RCM-CIP-001-1 09/22/2009, Version 1 (CIP Compliance Manual)
2. EV-CIP-001-1 FBI Email 09/18/2009
3. EV-CIP-001-1 FBI Letter 09/21/2009
4. EV-CIP-001-1 FBI Signature 09/23/2009
5. Greenwood CPW ICP (Internal Compliance Program)
6. Training CIP-001-1 09-30-2009 (evidence of training completion)

Conclusion:

On 10/07/09 SERC Reliability Corporation Compliance Staff ("SERC Staff") completed its review of the evidence submitted by Greenwood Commissioners of Public Works in support of its Certification of Completion of the subject Mitigation Plan. Based on its review of the evidence submitted, SERC Staff verifies that, in its professional judgment,



all required actions in the Mitigation Plan have been completed and Greenwood Commissioners of Public Works is in compliance with the subject Reliability Standard Requirements as of the certified date of completion of the Mitigation Plan, 10/1/2009.

This Statement, along with the subject Mitigation Plan, may become part of a public record upon final disposition of the possible violation.

Respectfully Submitted,

Janice K. Carney

Attachment c

Disposition Document

DISPOSITION OF VIOLATION¹**Dated June 10, 2010**NERC TRACKING
NO.**SERC200900333**
SERC200900334
SERC200900335
SERC200900336REGIONAL ENTITY TRACKING
NO.**09-094**
09-095
09-096
09-097

NOC#

NOC-499

REGISTERED ENTITY

Greenwood Commissioners of Public Works (CPW)

NERC REGISTRY ID

NCR01250

REGIONAL ENTITY

SERC Reliability Corporation (SERC)**I. REGISTRATION INFORMATION**

ENTITY IS REGISTERED FOR THE FOLLOWING FUNCTIONS:

BA	DP	GO	GOP	IA	LSE	PA	PSE	RC	RP	RSG	TO	TOP	TP	TSP
	X				X									
	5/31/07				5/31/07									

* VIOLATION APPLIES TO SHADED FUNCTIONS

DESCRIPTION OF THE REGISTERED ENTITY

Founded in 1896, CPW is a municipality that provides electric service to the businesses and citizens of Greenwood, South Carolina. CPW's distribution system operates primarily within the corporate limits of the City of Greenwood, distributing power to more than 10,000 customers. CPW has 6 substations (2 at 100 kV), 21 circuits (6 at 100 kV), and approximately 180 miles of line.

II. VIOLATION INFORMATION

RELIABILITY STANDARD	REQUIREMENT(S)	SUB- REQUIREMENT(S)	VRF(S)	VSL(S)
CIP-001-1	1		Medium	Severe
CIP-001-1	2		Medium	Severe
CIP-001-1	3		Medium	Severe
CIP-001-1	4		Medium	Severe

¹ For purposes of this document and attachments hereto, each violation at issue is described as a "violation," regardless of its procedural posture and whether it was a possible, alleged or confirmed violation.

PURPOSE OF THE RELIABILITY STANDARD AND TEXT OF RELIABILITY STANDARD AND REQUIREMENT(S)/SUB-REQUIREMENT(S)

The purpose statement of CIP-001-1 provides: “Disturbances or unusual occurrences, suspected or determined to be caused by sabotage, shall be reported to the appropriate systems, governmental agencies, and regulatory bodies.”

CIP-001-1 provides the following requirements:

R1. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the Interconnection.

R2. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.

R3. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.

R4. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load Serving Entity shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and develop reporting procedures as appropriate to their circumstances.

VIOLATION DESCRIPTION

On October 1, 2009, after a review by its consultant, CPW submitted a self-report and a self-certification form² stating that it did not have procedures and guidelines to comply with NERC Reliability Standard CIP-001-1 R1-R4 from June 18, 2007 through September 30, 2009. CPW reported that it did not realize that the Critical Infrastructure Protection Standards applied because CPW has no critical assets. CPW further stated that, upon review of the NERC compliance requirements by its consultant, CPW determined that the CIP-001-1 Standard did apply.

CPW, in its previous self-certifications, marked that the subject Standards were not applicable as CPW did not believe that it met the criteria for registration for the functions applicable to the subject violations. CPW had requested that SERC reconsider CPW’s registration, but, after discussions with other regions, NERC, and SERC staff and based on its review of the evidence, SERC reaffirmed on June 26,

² Because CPW submitted a self-report concurrent with its self-certification, SERC considered the method of discovery to be the self-report; however, no credit was given for self-reporting the violations.

2009 its determination that CPW is a user of the bulk power system (BPS) and meets the criteria to be registered as a Distribution Provider and Load-Serving Entity as defined by NERC and as set forth in the NERC Statement of Compliance Registry Criteria (Revision 5.0), which has been approved by the Commission. CPW did not file a formal appeal of the registration with SERC or NERC.

SERC concluded that the facts and evidence supported a finding that CPW violated R1, R2, R3 and R4 of NERC Reliability Standard CIP-001-1 because the evidence reviewed showed that CPW (1) did not have written procedural content that described how to recognize a sabotage event, and at what stage in the process operating personnel are made aware of the event; (2) did not have procedures for the communication of sabotage information to appropriate parties in the Interconnection; (3) had not provided its operating personnel with sabotage response guidelines; and (4) did not have written or electronic evidence of reporting procedures for coordination between local FBI and CPW facilities.

RELIABILITY IMPACT STATEMENT- POTENTIAL AND ACTUAL

SERC staff further concluded that the violations did not pose a serious or substantial risk to the reliability of the BPS because CPW's total load is less than 75 MW and it is connected to the Interconnection via a radial connection. Additionally, there were no reported sabotage events that occurred in CPW's system.

IS THERE A SETTLEMENT AGREEMENT YES ☒ NO ☐

WITH RESPECT TO THE VIOLATION(S), REGISTERED ENTITY

NEITHER ADMITS NOR DENIES IT (SETTLEMENT ONLY)	YES	<input type="checkbox"/>
ADMITS TO IT	YES	<input checked="" type="checkbox"/>
DOES NOT CONTEST IT (INCLUDING WITHIN 30 DAYS)	YES	<input type="checkbox"/>

WITH RESPECT TO THE ASSESSED PENALTY OR SANCTION, REGISTERED ENTITY

ACCEPTS IT/ DOES NOT CONTEST IT YES ☒

III. DISCOVERY INFORMATION

METHOD OF DISCOVERY

SELF-REPORT	<input checked="" type="checkbox"/>
SELF-CERTIFICATION	<input checked="" type="checkbox"/>
COMPLIANCE AUDIT	<input type="checkbox"/>
COMPLIANCE VIOLATION INVESTIGATION	<input type="checkbox"/>
SPOT CHECK	<input type="checkbox"/>
COMPLAINT	<input type="checkbox"/>

PERIODIC DATA SUBMITTAL
EXCEPTION REPORTING

☐
☐

DURATION DATE(S) **6/18/2007, the date the subject Standards became mandatory and enforceable, to 9/30/2009, the date CPW completed its Mitigation Plan.**

DATE DISCOVERED BY OR REPORTED TO REGIONAL ENTITY **10/1/2009**

IS THE VIOLATION STILL OCCURRING

YES ☐ NO ☒

IF YES, EXPLAIN

REMEDIAL ACTION DIRECTIVE ISSUED	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
PRE TO POST JUNE 18, 2007 VIOLATION	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>

IV. MITIGATION INFORMATION

FOR FINAL ACCEPTED MITIGATION PLAN:

MITIGATION PLAN NO. **MIT-07-2150**

DATE SUBMITTED TO REGIONAL ENTITY **10/1/2009**

DATE ACCEPTED BY REGIONAL ENTITY **11/24/2009³**

DATE APPROVED BY NERC **12/1/2009**

DATE PROVIDED TO FERC **12/2/2009**

IDENTIFY AND EXPLAIN ALL PRIOR VERSIONS THAT WERE ACCEPTED OR REJECTED, IF APPLICABLE

N/A

MITIGATION PLAN COMPLETED YES ☒ NO ☐

EXPECTED COMPLETION DATE **9/30/2009**

EXTENSIONS GRANTED **N/A**

ACTUAL COMPLETION DATE **9/30/2009**

DATE OF CERTIFICATION LETTER **10/1/2009**

CERTIFIED COMPLETE BY REGISTERED ENTITY AS OF **9/30/2009**

DATE OF VERIFICATION LETTER **10/7/2009**

VERIFIED COMPLETE BY REGIONAL ENTITY AS OF **9/30/2009**

ACTIONS TAKEN TO MITIGATE THE ISSUE AND PREVENT RECURRENCE

³ SERC accepted the Mitigation Plan on November 24, 2009, after it was verified complete because CPW submitted its Mitigation Plan, certified as complete, with its self-report and self-certification and SERC staff verified completion during its assessment of such violations on October 7, 2009.

1. CPW developed formal procedures to meet the requirements of R1, R2 and R3;
2. CPW provided training to its employees; and
3. CPW established communication with its local FBI office for reporting sabotage events to meet the requirements of R4.

LIST OF EVIDENCE REVIEWED BY REGIONAL ENTITY TO EVALUATE COMPLETION OF MITIGATION PLAN (FOR CASES IN WHICH MITIGATION IS NOT YET COMPLETED, LIST EVIDENCE REVIEWED FOR COMPLETED MILESTONES)

1. GCPW-RCM-CIP-001-1 9/22/2009, Version 1 (CIP Compliance Manual)
2. EV-CIP-001-1 FBI E-mail 9/18/2009
3. EV-CIP-001-1 FBI Letter 9/21/2009
4. EV-CIP-001-1 FBI Signature 9/23/2009
5. Greenwood CPW ICP (Internal Compliance Program)
6. Training CIP-001-1 9-30-2009 (evidence of training completion)

V. PENALTY INFORMATION

TOTAL ASSESSED PENALTY OR SANCTION OF **\$10,000** FOR **FOUR** VIOLATIONS OF RELIABILITY STANDARDS.

(1) REGISTERED ENTITY'S COMPLIANCE HISTORY

PRIOR VIOLATIONS OF ANY OF THE INSTANT RELIABILITY STANDARD(S) OR REQUIREMENT(S) THEREUNDER
YES ☐ NO ☒

LIST ANY CONFIRMED OR SETTLED VIOLATIONS AND STATUS

ADDITIONAL COMMENTS

PRIOR VIOLATIONS OF OTHER RELIABILITY STANDARD(S) OR REQUIREMENTS THEREUNDER
YES ☐ NO ☒

LIST ANY PRIOR CONFIRMED OR SETTLED VIOLATIONS AND STATUS

ADDITIONAL COMMENTS

(2) THE DEGREE AND QUALITY OF COOPERATION BY THE REGISTERED ENTITY (IF THE RESPONSE TO FULL COOPERATION IS "NO," THE ABBREVIATED NOP FORM MAY NOT BE USED.)

FULL COOPERATION YES ☒ NO ☐
IF NO, EXPLAIN

(3) THE PRESENCE AND QUALITY OF THE REGISTERED ENTITY'S COMPLIANCE PROGRAM

IS THERE A DOCUMENTED COMPLIANCE PROGRAM
YES ☒ NO ☐
EXPLAIN

CPW has a documented compliance program which defines responsibilities, accountability, and expectations for compliance, mitigation for non-compliance, self-reporting, process flow, audit procedure, self-certification, training, and a violation resolution process. CPW's Internal Compliance Program is widely disseminated throughout the organization.

EXPLAIN SENIOR MANAGEMENT'S ROLE AND INVOLVEMENT WITH RESPECT TO THE REGISTERED ENTITY'S COMPLIANCE PROGRAM. DOES SENIOR MANAGEMENT TAKE ACTIONS THAT SUPPORT THE COMPLIANCE PROGRAM, SUCH AS TRAINING, COMPLIANCE AS A FACTOR IN EMPLOYEE EVALUATIONS, OR OTHERWISE.

YES ☒ NO ☐
EXPLAIN

CPW's General Manager ensures that the organization complies with the NERC Standards by keeping employees accountable for maintaining compliance. CPW's Chief Financial Officer ensures compliance with NERC Standards through internal periodic audits of those Standards applicable to CPW and is responsible for the update and maintenance of the Internal Compliance Program with the approval of CPW's General Manager. CPW's Director of Electric Utilities further ensures compliance with the NERC Standards and is responsible for certifying that CPW's self-certifications, self-reporting and mitigation plans contain accurate information.

(4) ANY ATTEMPT BY THE REGISTERED ENTITY TO CONCEAL THE VIOLATION(S) OR INFORMATION NEEDED TO REVIEW, EVALUATE OR INVESTIGATE THE VIOLATION.

YES ☐ NO ☒
IF YES, EXPLAIN

(5) ANY EVIDENCE THE VIOLATION(S) WERE INTENTIONAL (IF THE RESPONSE IS "YES," THE ABBREVIATED NOP FORM MAY NOT BE USED.)

YES ☐ NO ☒
IF YES, EXPLAIN

(6) ANY OTHER MITIGATING FACTORS FOR CONSIDERATION

YES ☐ NO ☒
IF YES, EXPLAIN

(7) ANY OTHER AGGRAVATING FACTORS FOR CONSIDERATION

YES ☐ NO ☒
IF YES, EXPLAIN

(8) ANY OTHER EXTENUATING CIRCUMSTANCES

YES ☐ NO ☒
IF YES, EXPLAIN

(9) ADDITIONAL SUPPORT FOR ASSESSED PENALTY OR SANCTION

EXHIBITS (SEE ATTACHMENTS TO NOTICE OF PENALTY):

SOURCE DOCUMENT

CPW's self-report dated October 1, 2009
CPW's self-certification dated October 1, 2009

MITIGATION PLAN
CPW's Mitigation Plan submitted October 1, 2009

CERTIFICATION BY REGISTERED ENTITY
SERC's Verification of Completion dated October 7, 2009

OTHER RELEVANT INFORMATION:

**NOTICE OF ALLEGED VIOLATION AND PROPOSED PENALTY OR
SANCTION ISSUED**

DATE: OR N/A ☒

SETTLEMENT DISCUSSIONS COMMENCED

DATE: 11/13/2009 OR N/A ☐

NOTICE OF CONFIRMED VIOLATION ISSUED

DATE: OR N/A ☒

SUPPLEMENTAL RECORD INFORMATION

DATE(S) OR N/A ☒

REGISTERED ENTITY RESPONSE CONTESTED

FINDINGS ☐ **PENALTY** ☐ **BOTH** ☐ **NO CONTEST** ☒

HEARING REQUESTED

YES ☐ **NO** ☒

DATE

OUTCOME

APPEAL REQUESTED

Attachment d

Notice of Filing

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Greenwood Commissioners of Public Works

Docket No. NP10-____-000

NOTICE OF FILING
July 52, 2010

Take notice that on July 52, 2010, the North American Electric Reliability Corporation (NERC) filed a Notice of Penalty regarding Greenwood Commissioners of Public Works in the SERC Reliability Corporation region.

Any person desiring to intervene or to protest this filing must file in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 CFR 385.211, 385.214). Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a notice of intervention or motion to intervene, as appropriate. Such notices, motions, or protests must be filed on or before the comment date. On or before the comment date, it is not necessary to serve motions to intervene or protests on persons other than the Applicant.

The Commission encourages electronic submission of protests and interventions in lieu of paper using the "eFiling" link at <http://www.ferc.gov>. Persons unable to file electronically should submit an original and 14 copies of the protest or intervention to the Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426.

This filing is accessible on-line at <http://www.ferc.gov>, using the "eLibrary" link and is available for review in the Commission's Public Reference Room in Washington, D.C. There is an "eSubscription" link on the web site that enables subscribers to receive email notification when a document is added to a subscribed docket(s). For assistance with any FERC Online service, please email FERCOnlineSupport@ferc.gov, or call (866) 208-3676 (toll free). For TTY, call (202) 502-8659.

Comment Date: [BLANK]

Kimberly D. Bose,
Secretary