

**Attachment a**

**Source Document**



# Registered Entity Self-Reporting Form

(use TAB key to move between input fields)

Enter Today's Date

December 21, 2007

Month Date, Year Ex: August 8, 2007

| <i>Registered Entity Information</i> |                                     |
|--------------------------------------|-------------------------------------|
| Company Name:                        | Southwestern Public Service Company |
| Company NERC ID #:                   | NCR01145                            |
| Company Address:                     | Box 1261                            |
| Company Address2:                    |                                     |
| Company City:                        | Amarillo                            |
| Company State:                       | TX                                  |
| Company Zip:                         | 79105                               |

| <i>Contact Person Information</i> |  |
|-----------------------------------|--|
| Contact Person Name:              | Terri K. Eaton<br>1099 18 <sup>th</sup> Street<br>Denver, CO 80201 |
| Contact Person Telephone Number:  | (303) 308-2871   |
| Contact Person E-Mail Address     | terri.k.eaton@xcelenergy.com                                       |

| <i>Date of Violation<br/>(If Multiple Violations, Enter date(s) of each incident)</i> |
|---|
| 12/31/07  |
|   |
|   |

Month Date, Year Ex. August 8, 2007

| <i>Violation Being Reported</i>     |           |
|-------------------------------------|-----------|
| <b>Reliability Standard Number:</b> | PRC 008-0 |

| <i>Requirement Number Violated &amp; Corresponding Violation Risk Factor</i> |                              |
|--|------------------------------|
| <b>Requirement Number</b>  | <b>Violation Risk Factor</b> |
| R2   | Medium (as of 06/04/07)      |
|  |                              |
|  |                              |
|  |                              |

| <i>Entity Registered Functions</i>            |   |  |  |  |  |  |
|---|---|--|--|--|--|--|
| <input checked="" type="checkbox"/> <b>DP</b> | <input checked="" type="checkbox"/> <b>GO</b> | <input checked="" type="checkbox"/> <b>GOP</b> | <input checked="" type="checkbox"/> <b>LSE</b> | <input type="checkbox"/> <b>PA</b>             | <input checked="" type="checkbox"/> <b>PSE</b> | <input type="checkbox"/> <b>RC</b>             |
| <input checked="" type="checkbox"/> <b>RP</b> | <input type="checkbox"/> <b>RRO</b>           | <input type="checkbox"/> <b>RSG</b>            | <input checked="" type="checkbox"/> <b>TO</b>  | <input checked="" type="checkbox"/> <b>TOP</b> | <input checked="" type="checkbox"/> <b>TP</b>  | <input checked="" type="checkbox"/> <b>TSP</b> |

### *Additional Detail or Description of Reliability Standard*

Title: Implementation and Documentation of Underfrequency Load Shedding Equipment Maintenance Program

Purpose: Provide last resort system preservation measures by implementing an Under Frequency Load Shedding (UFLS) program.

R2: The Transmission Owner and Distribution Provider with a UFLS program (as required by its Regional Reliability Organization) shall implement its UFLS equipment maintenance and testing program and shall provide UFLS maintenance and testing program results to its Regional Reliability Organization and NERC on request (within 30 calendar days).

### *Cause of Alleged Violation*

SPS's relay schedule says it will do 15 specific relays in 2007. One UFLS relay cannot be done in 2007. The test will be scheduled in the first quarter of 2008 due to customer concerns.

### *How was the violation discovered? (e.g. self-evaluation, internal audit, etc.)*

Self-evaluation - When implementing the relay schedule it was identified that the Shell CO2 relay could not be tested without a plant outage. Due to customer concerns, the test cannot be completed by the end of 2007.



Has the violation been corrected? ☐ Yes ☒ No

If 'Yes' Date of correction:

If 'No' you must submit a Registered Entity Mitigation Plan form to show that corrective steps are being taken [you may submit the Mitigation Plan form with this self-report]. If a Mitigation Plan is not being submitted with this form, please complete the following:

Expected Date of Mitigation Plan submittal[s]: 12/21/07

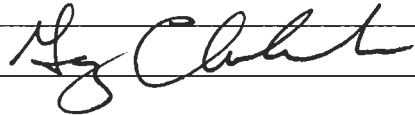
| <i>Anticipated/Actual Impact of the Violation on the Bulk Power System Reliability</i>   |
|--|
| Minimal - SPS would still meet the UFLS requirement if an event occurred and if the Shell CO2 relay failed to operate. This relay provides additional margin for UFLS. |

*Any Additional Information*

None

Compliance or Corporate Officer  
Signature:

(Electronic signature acceptable)



Date:

12/20/07

Print Name:

Greg Chamberlain

Print Title:

Director, Transmission Portfolio  
Delivery

**Attachment b**

**Settlement Agreement(s)**



Mr. Ron Ciesiel  
Executive Director, Compliance  
[rciesiel@spp.org](mailto:rciesiel@spp.org)

Southwest Power Pool Regional Entity  
415 N. McKinley, Ste 140  
Little Rock, AR 72205-3020  
P 501.614.3265  
F 501.821.8726

August 12, 2009

**CONFIDENTIAL NON-PUBLIC INFORMATION**

**BY E-MAIL AND U.S. MAIL**

Ms. Terri Eaton  
Director, Regulator Admin. & Compliance  
Southwestern Public Service Company (SPS)  
18201 West 10<sup>th</sup> Avenue  
Golden, Colorado 80401

**Re: Notice of Proposed Expedited Disposition of Pending Violations or Alleged Violations**

Dear Ms. Eaton:

This letter is notice that the Southwest Power Pool Regional Entity (SPP RE) is proposing to expedite disposition of the pending violation or alleged violation listed in **Attachment B**. SPP RE intends to file with the North American Electric Reliability Corporation ("NERC") and the Federal Energy Regulatory Commission ("FERC") a request to expedite resolution of the pending violation or alleged violation listed in **Attachment B** and to accept disposition of the violation or alleged violation under the terms of the Agreement in **Attachment A** hereto, based on the following factors:

- The violation does not pose a high risk to system reliability (Lower or Medium VRF).
- The violation was discovered prior to July 3, 2008.
- The violation has been mitigated or a mitigation plan has been submitted by the Registered Entity and accepted by SPP RE and NERC.

This proposed expedited disposition will result in the assessment of zero penalties for the violation listed in **Attachment B** if this disposition is accepted by Southwestern Public Service Company (SPS) and by NERC and FERC.

**Please review the information below and provide a written response no later than 10 days from the date of this Notice.** Responses should be directed to the SPP RE File Clerk at [SPP\\_Regional\\_Entity\\_File\\_Clerk@spp.org](mailto:SPP_Regional_Entity_File_Clerk@spp.org). If SPS accepts this proposed expedited disposition, sign the attached Agreement and return it to SPP RE within 10 days after the date of this Notice. If SPS does not respond within 10 days, SPP RE will deem this Agreement accepted by SPS.



If you have questions, please call me at 501.614.3265.

Very Respectfully,

*Ronald W. Ciesiel*

Ron Ciesiel

**ATTACHMENT A  
AGREEMENT**

**Southwestern Public Service Company (SPS) and Southwest Power Pool Regional Entity (SPP RE) agree to the following:**

1. Acceptance of this Agreement results in the assessment of zero penalties for the violation listed in **Attachment B**, subject to approval or modification by the North American Electric Reliability Corporation ("NERC") and the Federal Energy Regulatory Commission ("FERC").
2. The violation listed in **Attachment B** will be considered a Confirmed Violation for all purposes and may be used as an aggravating factor in accordance with the NERC Sanction Guidelines for determining appropriate monetary penalties or sanctions for future violations.
3. SPS attests to the best of our knowledge, there have been no repeat occurrences of the violation listed in **Attachment B**.
4. The expedited disposition agreed to herein represents a full and final disposition of the violation listed in **Attachment B**, subject to approval or modification by NERC and FERC.
5. This Agreement and expedited disposition shall become effective upon NERC and FERC approval of the Agreement and expedited disposition without modification by order or operation of law as submitted to FERC or as modified in a manner acceptable to the both parties. If NERC or FERC reject or modify the Agreement, or in the event NERC or FERC impose a material change or condition unacceptable to a Party or Parties to the Agreement, the Agreement shall be deemed withdrawn as to such objecting Party or Parties, and shall not constitute any part of the record in this proceeding or be used for any other purpose.

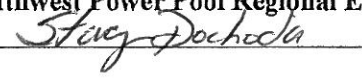
Accepted:

**Southwestern Public Service Company**

By 

8/20/09  
Date

**Southwest Power Pool Regional Entity**

By 

8/31/09  
Date

## ATTACHMENT B

### List of Violations

| NERC Violation ID | Registered Entity                      | Standard  | Requirement |
|-------------------|--|-----------|-------------|
| SPP200700007      | Southwestern Public<br>Service Company | PRC-008-0 | R2          |
|                   |  |           |             |

# **Attachment c**

## **Mitigation Plan**

## Mitigation Plan Submittal Form

Date this Mitigation Plan is being submitted: 12/21/07

If this Mitigation Plan has already been completed:

- Check this box ☐ and
- Provide the Date of Completion of the Mitigation Plan:

### Section A: Compliance Notices

- Section 6.2 of the CMEP<sup>1</sup> 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 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.

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<sup>1</sup> "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.



- This submittal form may be used to provide a required Mitigation Plan for review and approval by SPP RE and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) 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 SPP RE 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.
- SPP RE 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: Southwestern Public Service Company  
Company Address: Box 1261, Amarillo, TX 79105  
NERC Compliance Registry ID (*if known*): NCR01145

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

Name: Terri K. Eaton - 1099 18th Street, Denver, CO 80201  
Title: Project Director, Regulatory And Strategic Affairs  
Email: terri.k.eaton@xcelenergy.com  
Phone: (303) 308-2871

## **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: PRC 008-0 [Identify by Standard Acronym (e.g. FAC-001-1)]**

C.2 Requirement(s) violated and violation dates:

| NERC Violation ID #<br>[if known] | [Company<br>Acronym]<br>Violation ID #<br>[if known] | Requirement<br>Violated<br>(e.g. R3.2) | Violation<br>Date <sup>(*)</sup> |
|-----------------------------------|--|--|----------------------------------|
| aaaaaYYYYnnnnn                    | 1234577890   | Rn.n.n                                 | MM/DD/YY                         |
|                                   |  | R2                                     | 12/31/07                         |
|                                   |  |  |                                  |
|                                   |  |  |                                  |
|                                   |  |  |                                  |
|                                   |  |  |                                  |
|                                   |  |  |                                  |
|                                   |  |  |                                  |

(\*) Note: The Violation Date shall be: (i) 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 [company acronym]. Questions regarding the date to use should be directed to the [company acronym].

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

SPS's relay testing schedule says it will do 15 specific relays in 2007. One UFLS relay cannot be tested in 2007. The test will be scheduled in the first quarter of 2008 due to end use customer concerns.

[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:

The testing of the UFLS at the Shell CO2 plant will be performed. This test requires an outage at the Shell CO2 plant. The Shell plant management agreed





on December 19, 2007 to negotiate a date between February 1 and March 31, 2008 to allow the relay test work to be done.

1) SPS and Shell plant management will determine a firm test date by February 15, 2008.

2) The relay will be tested by March 31, 2008.

[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: Relay test will be completed by March 31, 2008.

D.3 Enter Milestone Activities, with completion dates, that your organization is proposing for this Mitigation Plan:

| Milestone Activity                   | Proposed Completion Date*<br>(updates shall not be more than 3 months apart) |
|--------------------------------------|--|
| Schedule plant outage for relay test | February 15, 2008  |
| Complete relay testing               | March 31, 2008   |
|                                      |  |
|                                      |  |

(\*) 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:

Minimal risk - SPS would still meet the UFLS requirement if an event occurred and if the Shell CO2 relay failed to operate. This relay provides additional margin for UFLS.

[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 next test of the Shell CO2 plant UFLS relay is six years in the future. The Shell relay completes the 2007 schedule.

[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:

At the time of testing, a test switch will be installed so that a plant outage will not be required for future testing of the UFLS relay.

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



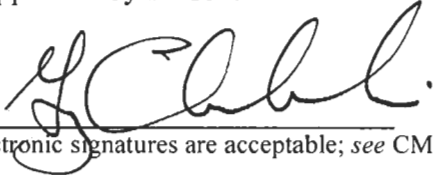
## Section F: Authorization

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 SPP RE for acceptance by SPP RE 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 **Director, Transmission Portfolio Delivery**.
- 2. I am qualified to sign this Mitigation Plan on behalf of **Southwestern Public Service Company**.
- 3. I have read and understand **Southwestern Public Service Company's** 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. **Southwestern Public Service Company** agrees to be bound by, and comply with, the Mitigation Plan, including the timetable completion date, as approved by SPP RE and approved by NERC.

**Authorized Individual Signature**

  
(Electronic signatures are acceptable; see CMEP)

Name (Print): Greg Chamberlain

Title: Director, Transmission Portfolio Delivery

Date: 12/20/07



## **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]

Please direct any questions regarding completion of this form to:

Shon Austin  
501-614-3273  
[saustin@spp.org](mailto:saustin@spp.org)

or Kevin Goolsby  
501-614-3275  
[kgoolsby@spp.org](mailto:kgoolsby@spp.org)

## **Section H: To submit the form**

1. Log into the CDMS tool
2. Go to the top and click on Non-Compliance/Self-report
3. Complete the "add new self-report" for the standard in violation (button is at the bottom of the page)
4. Once completed this will create an open mitigation file
5. Go to the top and click Non-Compliance/Mitigation Plans
6. Choose edit for the standard you are reporting
7. Here you can complete the information in each of the tabs or go to the Documents tab and upload this report.
8. To upload the report, press Browse and find the report on your machine. Type in a description of the mitigation report and submit.
9. Finally, please send Shon and Kevin an e-mail stating that you have submitted a mitigation plan into the CDMS.

## **Attachment d**

### **Registered Entity's Certification of Completion**

**From:** [Eaton, Terri K](#)  
**To:** [Kevin Goolsby;](#)  
**cc:** [Thompson, Bob \(in Transmission\) F; Cenedella, Dave; Eaton, Terri;](#)  
[Kauffman, Bryan P;](#)  
**Subject:** PRC 008 - Mitigation Plan completion  
**Date:** Thursday, March 06, 2008 3:07:30 PM  
**Attachments:** [Completed WO.jpg](#)

---

Kevin, SPS has completed its mitigation plan on PRC-008. An electronic copy of the work order is attached.

Please let me know if you have any questions or require further information.

-----Original Message-----

**From:** Sicola, Tony

**Sent:** Thursday, March 06, 2008 9:15 AM

**To:** Thompson, Bob (in Transmission) F

**Cc:** Bellinghausen, Alan L

**Subject:** PRC 008 - Mitigation Plan completion

Bob,

A copy of the completed Passport work order ( 1097786 ) indicating completion that you requested.

Tony Sicola, Manager System Protection

806 378 2108

Fax 806 378 2024

Cell 806 679 7486

<<Completed WO.jpg>>



P.O. Box 1078  
Denver, Colorado 80402

June 12, 2008

Kevin Goolsby, Lead Engineer-Compliance  
Southwest Power Pool  
415 N. McKinley, 140 Plaza West  
Little Rock, AR 72205-3020

Via fax: 501-664-6923

Re: SPP200700007

Dear Kevin:

By email dated March 6, 2008, I notified you of completion of the mitigation plan relating to the referenced matter. The purpose of this letter is to more formally document completion of that mitigation plan.

I attached to my March 6, 2008 email a copy of a workorder showing work completed in accordance with that mitigation plan. A copy of that workorder is attached hereto. Further, additional information relating to completion of that mitigation plan was mailed to you on June 4, 2008 in response to your May 28, 2008 request for additional information.

Please let me know if you need any further information relating to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Terri K. Eaton'.

Terri K. Eaton, Project Director  
Mandatory Reliability Standard Compliance Program  
Xcel Energy Services Inc.  
P. O. Box 1078  
Golden, CO 80402  
303-273-4878

Cc: Bryan Kauffman

1

\_\_\_\_\_

14.  $\frac{1}{2} \times \frac{1}{2} = \frac{1}{4}$

## **Attachment e**

### **Regional Entity's Verification of Completion**



## SPP RE Mitigation Plan / Milestone Completion Review

**Registered Entity:** Southwestern Public Service Co.

**Registry ID:** NCR01145

**NERC Violation ID:** SPP200700007

**Date Violation Discovered:** Planned Violation 12/31/07

**Discovery Method:** Self Report

**Violation Risk Factor:** Medium

**Violation Risk Factor Determination:**

**Violation Severity Level:** Lower

**Violation Severity Level Determination:**

**Violation Reset Period:**

**Type Violation:** Occurrence/Continuing/Hybrid

**Can the Registered Entity incur additional violations during a reset period?**

**Workbook Impact Statement:**

**NERC Mitigation Plan No:** MIT-07-0224

| Administration Record  | Date     |
|--|----------|
| Violation Date   | 1/1/08   |
| Mitigation Plan submitted by Registered Entity                             | 12/21/07 |
| Mitigation Plan accepted by SPP (CDMS)                                     | 12/21/07 |
| Mitigation Plan sent to NERC (Workbook Update)                             |          |
| Mitigation Plan accepted by NERC (Confirmation of Mitigation Plan to FERC) | 2/5/08   |
| Proposed Mitigation Plan Completion Date                                   | 3/31/08  |
| Registered Entity Certification of Mitigation Plan / Milestone Completion  | 3/6/08   |
| SPP RE Verification Review   | 9/8/09   |
|  |          |

**Reliability Standard(s) and Requirement(s) at Issue:** PRC-008-0 R2

**Cause of the Violation:** SPS was unable to test one of its UFLS relays on schedule because the test required a substation outage and one of its customers requested the outage be postponed until 1<sup>st</sup> quarter 2008.

**Proposed Mitigation Plan:** Delay testing of the UFLS relay until customer can take outage.

| Mitigation Plan Activity/Milestone Under Review | Due Date | Completion Date | Evidence/Documentation Review Date |
|---|----------|-----------------|------------------------------------|
| Schedule plan outage for relay test             | 2/15/08  |                 |                                    |
| Complete relay testing                          | 3/31/08  | 3/6/08          | Work Order Completion Record       |
|   |          |                 |                                    |

|  |  |  |  |
|--|--|--|--|
|  |  |  |  |
|--|--|--|--|

**Abatement of Interim BPS Reliability Risk:** Minimum risk – SPS will still meet its minimum UFLS requirement if an event occurred and if the Shell CO2 relay failed to operate. This relay provides additional margin for UFLS.

**Prevention of Future BPS Reliability Risk:** The next test of the Shell CO2 plant UFLS relay is six years in the future. The Shell relay completes the 2007 schedule.

**Milestone/Mitigation Plan under review:** Mitigation plan completion.

**Statement of review of the confirmation and supporting evidence indicating the verification of completion of the Mitigation Plan / Milestone:** Reviewed the work sheet for the completion of the testing of the UFLS relay and found the testing was complete.

### Mitigation Plan Documentation Record

| Document Description         | Record File Name |
|------------------------------|------------------|
| Work Order Completion Record | Completed WO.jpg |
|                              |                  |
|                              |                  |
|                              |                  |
|                              |                  |
|                              |                  |

### Other Relevant Information:

**Has the Registered Entity completed the milestone and/or mitigation plan under review?** Yes

**Review Performed by:** Joe Gertsch