

City of Leesburg

Electric Department

2014 Annual NERC Compliance Review

February 27, 2014

- Purpose:** The purpose of the 2014 Annual NERC Compliance Review is to thoroughly examine each NERC Reliability Standard and its associated Requirements to assure that the City of Leesburg Electric Department is in compliance.
- Scope:** The scope of the 2014 Annual NERC Compliance Review is to review every Standard to determine if the City is required to be compliant with the Standard, verify that the City was in compliance during the previous year, and to make sure that the City is in compliance moving forward.
- Duration:** December 2013 to February 2014
- Findings:** This Review covered 32 NERC Standards with 161 individual Requirements plus the City of Leesburg Reliability Compliance Program.

It was determined that the City of Leesburg Electric Department is no longer responsible to comply with 6 Standards with 26 individual Requirements. This determination was made based on the Standard's Entity Applicability and if our Load Servicing Entity (LSE), which is FMPA, requires that the City be in compliance.

It was determined that the City of Leesburg Electric Department must be in compliance with 26 NERC Standards with 135 individual Requirements plus the City of Leesburg Reliability Compliance Program.

There are 5 major updates to the Standards. These updates were made due to revised Standards, revised NERC Glossary of Terms, updating our "best practices", or a general strengthening of the City's Compliance Program. The 5 Standards with Major updates are:

- EOP-004
- PRC-005
- PRC-006
- PRC-008
- Reliability Compliance Program

There was one minor changes to all evidence documents which placed the new City of Leesburg logo on all evidence documents.

Training: All training documents were updated and distributed to all employees with direct compliance responsibilities. The 3 training presentations were:

- Reliability Compliance Program
- PRC-005
- PRC-008

Reports: There are 2 reports that are required to be completed after an Annual NERC Review. This document fulfills one of the reporting requirements. The second reporting requirement is to give a presentation to the City Commission. The City Commission Presentation has been completed and reviewed. As of the date of this report, the Annual NERC Presentation to the City Commission has not been placed on the agenda.

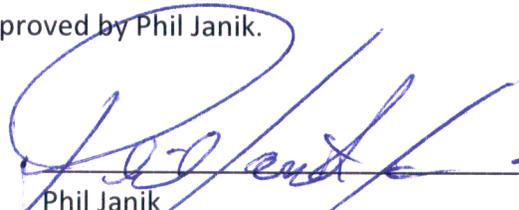
Future: There is one new Standard currently scheduled to go into effect on April 1, 2014. This Standard has 5 individual Requirements.

There are 5 new Standards with 25 individual Requirements that are in the pipeline. These 5 Standards have received NERC Board of Trustee approval and are waiting for FERC approval. These new Standards could be effective as soon as the end of 2015. If that is the case, preparations for compliance may need to start as early 2015. We will monitor the progress of the Standards as they go through the approval process.

Summary: The City of Leesburg Electric Department was in compliance during the previous year and is currently in compliance with all applicable Standards and associated Requirements.

This report was compiled by Chris Adkins and approved by Phil Janik.

  
Chris Adkins                      3-3-14  
Date

  
Phil Janik                      3-3-14  
Date