



NORTHEAST POWER COORDINATING COUNCIL, INC.
1040 AVE. OF THE AMERICAS, NEW YORK, NY 10018 (212) 840-1070 FAX (212) 302-2782

Operations and Planning Compliance Audit Report Public Version

**Caribou Wind Park Limited Partnership
New Brunswick Energy and Utilities Board Compliance
Registry NBCR0004**

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

**Date of Audit: July 27, 2015 to October 9, 2015
Audit Period: October 1, 2013 to September 9, 2015
Date of Report:**

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Executive Summary

The Northeast Power Coordinating Council (NPCC) is a recognized compliance body in New Brunswick and assists the New Brunswick Energy and Utilities Board (NBEUB) with compliance monitoring functions in the Province.

Northeast Power Coordinating Council (NPCC) conducted an Operations & Planning compliance Audit of Caribou Wind Park Limited Partnership (Caribou), NBCR0004, which began on July 27, 2015, with the Initial Audit Briefing, and concluded with the Audit Exit Briefing on October 9, 2015. At the time of the Audit, Caribou was registered for the functions of Generator Owner (GO) and Generator Operator (GOP).

The table below identifies key Functions performed on behalf of Caribou:

Functional Model Interface	Registered Entity NBEUB ID
Reliability Coordinator (RC)	NB Power Corporation (NB Power) – NBCR001
Balancing Authority (BA)	NB Power Corporation (NB Power) – NBCR001
Transmission Operator (TOP)	NB Power Corporation (NB Power) – NBCR001
Planning Authority (PA)	NB Power Corporation (NB Power) – NBCR001
Transmission Planner (TP)	NB Power Corporation (NB Power) – NBCR001
Resource Planner (RP)	NB Power Corporation (NB Power) – NBCR001

The Audit team evaluated Caribou for compliance with a total of fourteen (14) standards and thirty eight (38) requirements in the 2015 New Brunswick Energy and Utilities Board (NBEUB) Implementation Plan. The team assessed compliance with the NERC Reliability Standards (and Regional Reliability Standards if applicable) for the period of October 1, 2013 to September 9, 2015, the audit materials submission date.

There were no open enforcement actions or mitigation plans at the time of the audit. Caribou submitted evidence for the team's evaluation of compliance with requirements. The team reviewed and evaluated all evidence provided to assess compliance with reliability standards applicable to Caribou at this time. Based on the evidence provided, the team's findings are summarized in Table 1 below:

Table 1. Summary of Findings

	No Finding	Possible Violation	Open Enforcement Action*	Not Applicable	Total
Reliability Standard Requirements	33	1	0	4	38

*OEA's with newly identified PVs are counted in the PV column only; not in the OEA column. OEA's without newly identified PVs are counted in the OEA column.

The team notified Caribou of zero (0) Areas of Concern¹ and zero (0) Recommendations.

The findings included in this report are the same as the findings presented to Caribou Wind Park Limited Partnership during the Exit Briefing. The findings are further explained in the Audit Findings section and the Findings table of the report. The Findings table includes information of the team's findings of applicability and compliance to the NERC Reliability Standards (and Regional Reliability Standards if applicable) within the scope of the Audit. Possible Violations will be processed in accordance with the NB Reliability Standards Regulation-Electricity Act (Reliability Standards Regulation).

NPCC certifies that the Audit team adhered to all applicable requirements of the NERC Rules of Procedure (ROP) and Compliance Monitoring and Enforcement Program (CMEP).² NPCC is solely responsible for the content of this report. The NPCC Audit Manager has confirmed that the content of this report is true, to the best of his knowledge.

Audit Process

The compliance Audit process steps are detailed in the NERC Rules of Procedure, the NERC CMEP, and the NPCC CMEP Implementation Plan. The Compliance Monitoring and Enforcement Program generally conforms to the United States Government Auditing Standards and other generally accepted audit practices.

Objectives

All registered entities are subject to compliance assessments with all reliability standards applicable to the functions for which the registered entity is registered as per the Reliability Standards Regulation. The Audit objectives are to:

¹ Per FERC Guidance Order on Compliance Audits Conducted by the Electric Reliability Organization and Regional Entities, dated January 15, 2009

² This statement replaces the Regional Entity Self-Certification process.

- Review compliance with the requirements of reliability standards that are applicable to Caribou Wind Park Limited Partnership, based on the functions that Caribou Wind Park Limited Partnership is registered to perform;
- Validate compliance with applicable reliability standards from the 2015 NBEUB Annual Implementation Plan list of actively monitored standards and additional NERC Reliability Standards selected by NPCC and the NBEUB;
- Validate compliance with applicable Regional Reliability Standards from the 2015 NBEUB Annual Implementation Plan list of actively monitored standards, if applicable;
- Validate evidence of self-reported violations and previous self-certifications;
- Review the status of open mitigation plans.

Scope

The scope of the compliance Audit included the NERC Reliability Standards from the 2015 NBEUB Annual Implementation Plan list of actively monitored standards and additional NERC Reliability Standards selected by NPCC and the NBEUB. For this Audit, there was no review of mitigation plans or remedial action directives that were open during the Audit. The team did not expand the scope of the Audit beyond what was stated in the notification package.

Confidentiality and Conflict of Interest

Confidentiality and conflict of interest of the Audit team are governed under the NPCC Delegation Agreement with NERC and Section 1500 of the NERC Rules of Procedure. Caribou Wind Park Limited Partnership was informed of NPCC's obligations and responsibilities under the agreement and procedures. The work history for each team member was provided to Caribou, which was given an opportunity to object to a team member's participation on the basis of a possible conflict of interest or the existence of other circumstances that could interfere with a team member's impartial performance of duties. Caribou had not submitted any objections by the stated 15-day objection due date and accepted the team member participants without objection. There were no denials or access limitations placed upon this team by Caribou.

Methodology

The Audit team reviewed the evidence submitted by Caribou Wind Park Limited Partnership and assessed compliance with requirements of the applicable reliability standards. NPCC provided Caribou with a Request for Information (RFI) prior to commencement of the Audit. Caribou provided pre-Audit evidence at the time requested, or as agreed upon, by NPCC. Additional evidence could be submitted until the agreed-upon deadline prior to the exit briefing. After that date, only data or information that was relevant to the content of the report or its finding could be submitted with the agreement of the audit team lead.

The Audit team reviewed documentation provided by Caribou and requested additional evidence and sought clarification from subject matter experts during the Audit. Evidence submitted in the form of policies, procedures, emails, logs, studies, data sheets, SME conference calls, etc. were validated, substantiated, and cross-checked for accuracy as

appropriate. Where sampling was applicable to a requirement, the sample set was determined by a statistical methodology, along with professional judgment.

Findings were based on the facts and the documentation that was reviewed, the team's knowledge of the bulk electric system (BES), the NERC Reliability Standards, and professional judgment. All findings were developed based upon the consensus of the team.

Company Profile

Caribou Wind Park Limited Partnership ("Caribou") is a limited partnership formed under the provisions of the Limited Partnership Act (New Brunswick) and whose sole asset is Caribou power generating facility. The general partner of Caribou is Caribou Wind Park GP Limited, a New Brunswick corporation. GDF Suez Canada Services LP and Caribou are party to an operations and maintenance agreement. GDF Suez Canada Services LP is an Ontario limited partnership and an affiliate of GDF SUEZ Energy Generation NA, Inc. Supporting the operating services personnel is a NERC Compliance Group headed by the Vice President of Regulatory Compliance who reports to the President and CEO of GDF SUEZ Energy Generation NA, Inc. reporting to the Vice President of Regulatory Compliance is the Director of NERC Compliance, the single point of contact for the Plant Managers on issues regarding NERC Compliance. The NERC Compliance Group is staffed with subject matter experts who are responsible for monitoring, reviewing and assisting the Registered Entities in compliance activities.

The Caribou generating facility is a dispersed power producing resource located at Caribou Mountain in South Tetagouche, New Brunswick. The facility began commercial operation in 2009. The facility's primary and sole fuel source is wind. The facility is a nominal 99 MW (103.125 MVA) generation plant consisting of 33 asynchronous Vestas V90 wind turbine generators (WTG) rated at 3 MW (3.125 MVA) each and is capable of approximately 32.6% net capacity. The WTG are connected to a 35 kV collector bus via four feeders. Feeders 1, 2, 3, 4 consist of 8, 8, 12, 5 WTG, respectively. Caribou Wind Park LP collector bus connects to NB Power Corporation at 138 kV via a 35/138 kV tie transformer with a maximum rating of 108.3 MVA. A single point of interconnection, located at the 1238 side of the switch CW1238D in Caribou's substation, connects to the 138 kV line 1238 (owned by NB Power Corporation) in turn which connects to the Bathurst Terminal via line 1137/1195.

Audit Participants

Following is a list of all personnel from the NPCC Audit team, Caribou and NBEUB who were directly involved during the meetings and interviews.

NPCC Team:

Role	Title	Entity
Audit Team Lead	Lead Auditor	NPCC
Associate Auditor	Lead Auditor	NPCC
Audit Manager	Manager, Compliance Monitoring	NPCC

Caribou Wind Farm Limited Partnership Participants:

Title	Entity
Plant Manager	GDF SUEZ energy Generation NA, Inc.
Director NERC Operations	GDF SUEZ energy Generation NA, Inc.
Director of Operations, North America – Windpower and Solar Generation	GDF SUEZ energy Generation NA, Inc.
NERC Compliance Senior	GDF SUEZ energy Generation NA, Inc.

NBEUB Participants:

Title	Entity
Director of Reliability Standards & Compliance	New Brunswick Energy & Utilities Board
Compliance & Enforcement Coordinator	New Brunswick Energy & Utilities Board

Audit Findings

The following information details the compliance findings for the reliability standards and requirements identified in the scope of this Audit.

Standard	Req.	Finding
COM-002-2	R1.	No Finding
EOP-004-2	R1.	No Finding
EOP-004-2	R2.	No Finding
EOP-004-2	R3.	No Finding
FAC-002-1	R1.	No Finding
IRO-001-1.1	R8.	No Finding
IRO-010-1a	R3.	No Finding
MOD-010-0	R1.	No Finding
MOD-010-0	R2.	No Finding

MOD-012-0	R1.	No Finding
MOD-012-0	R2.	No Finding
PRC-001-1	R2.	No Finding
PRC-001-1	R3.	No Finding
PRC-001-1	R5.	No Finding
PRC-004-2.1a	R2.	No Finding
PRC-004-2.1a	R3.	No Finding
PRC-005-1.1b	R1.	No Finding
PRC-005-1.1b	R2.	Possible Violation
PRC-006-NPCC-1	R13.	No Finding
PRC-006-NPCC-1	R14.	No Finding
PRC-006-NPCC-1	R15.	Not Applicable
PRC-006-NPCC-1	R16.	Not Applicable
PRC-006-NPCC-1	R22.	Not Applicable
PRC-006-NPCC-1	R23.	Not Applicable
TOP-002-2.1b	R3.	No Finding
TOP-002-2.1b	R13.	No Finding
TOP-002-2.1b	R14.	No Finding
TOP-002-2.1b	R15.	No Finding
TOP-002-2.1b	R18.	No Finding
TOP-003-1	R1.	No Finding
TOP-003-1	R2.	No Finding
TOP-003-1	R3.	No Finding
VAR-002-3	R1.	No Finding
VAR-002-3	R2.	No Finding
VAR-002-3	R3.	No Finding
VAR-002-3	R4.	No Finding
VAR-002-3	R5.	No Finding
VAR-002-3	R6.	No Finding

Recommendations

The Audit team identified and informed Caribou of zero (0) Areas of Concern.

The Audit team identified and informed Caribou of zero (0) Recommendations.

Compliance Culture

During all contacts, the Caribou Wind Park Limited Partnership representatives were professional and positive in their approach to compliance. All additional information and data requested, including the SME conference calls, was provided and conducted in a timely manner and comprehensive fashion. The NPCC audit team would like to thank the Caribou Wind Park Limited Partnership audit team for their willing support offered throughout the audit process. The auditors wish to especially recognize Caribou's attention to detail as witnessed by their preparation of an audit package that provided clear narrative explanations and detailed evidence in support of each requirement audited.