



**NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION**

December 28, 2010

VIA ELECTRONIC FILING

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

Re: FERC Docket Nos. RC11-1-000 and RC11-2-000

Dear Ms. Bose:

On December 7, 2010, Milford Wind Corridor Phase I, LLC (“Milford”) filed and served a letter in the above-referenced dockets (“December 7 Letter”) requesting that the Western Electricity Coordinating Council (“WECC”) publicly release a Compliance Protocol document developed by the North American Electric Reliability Corporation (“NERC”), WECC, and the New Harquahala Generating Company, LLC (“Harquahala”) that set forth Harquahala’s proposal for its planned compliance with Transmission Owner (“TO”) and Transmission Operator (“TOP”) Reliability Standards. In its December 7 Letter, Milford also requested that WECC suspend the NERC certification process scheduled to be completed by the end of the first half of 2011. Milford requested that, to the extent that WECC does not suspend the NERC certification process, it be provided: (1) a list of TO/TOP standards that WECC believes apply to Milford; and (2) the Compliance Protocol described above.

With respect to the list of TO/TOP Reliability Standards applicable to Harquahala, the list was publicly filed in FERC Docket No. RC08-4-002, on July 25, 2008. That filing is available on Federal Energy Regulatory Commission’s (“Commission” or “FERC”) web site; however, a copy of the filing is attached for ease of reference. That filing remains pending before the FERC.¹

Regarding Milford’s request for the Compliance Protocol, it was designated as confidential information by the signatory parties. NERC counsel has confirmed with counsel and representatives for the respective entities that NERC, WECC and Harquahala now consent to its release. Accordingly, the Compliance Protocol has now been marked “For Public Release” and is being provided by this transmittal. It consists of one protocol document with Attachments A and B and a subsequent amendment thereto that eliminated Appendix 1 of Attachment B.

¹ Compliance Filing of the North American Electric Reliability Corporation in Response to the Commission’s May 16, 2008 Order, Docket No. RC08-4-000 (July 25, 2008).

Portions of the now-superseded Appendix 1 have been redacted due to privileged and confidential information therein.

While NERC is making the Compliance Protocol publicly available, the Compliance Protocol in and of itself is a red herring issue in Milford's registration appeal proceeding. NERC notes that the Harquahala proceeding is two years old and the agreement was developed in the early years of start-up of NERC as the electric reliability organization. The list applied in that proceeding related to the Reliability Standards that were effective at that time. Since then, NERC has produced new versions and new standards. It is specific to Harquahala's proposal for how Harquahala intends to comply with the TO/TOP Reliability Standards, based on its facilities and operations. Whether it would apply to any other generators or entities remains to be seen. For example, Milford has gone to great lengths in its pending registration appeal to distinguish itself from Harquahala, as have other parties in this proceeding.

While NERC and WECC developed the Harquahala TO/TOP Reliability Standard list in response to the FERC Order in Docket No. RC08-4-000, NERC does not read the Harquahala Order to require it to prepare such a list or enter into such an agreement with every generator, nor would such an approach be feasible because there are over 1,800 entities subject to over 1,200 Reliability Standard requirements. In addition, there are mechanisms already in place, outside the context of a registration appeal, for entities to notify Regional Entities of actual and specific physical, technical or operational limitations that may render a particular requirement inapplicable. Merely asserting that none should apply because an entity is already subject to other Reliability Standards under a different function is not a valid basis to evade compliance responsibility for a given function.

In addition, arguing that another entity should be responsible where there is no written agreement in place between the two parties to govern compliance responsibility for Reliability Standards similarly is not a valid basis. As an example of a valid basis for inapplicability of a given standard, if an entity does not have underfrequency load shedding (UFLS) equipment, and is not required to do so, then it would not be subject to UFLS requirements.

Registered entities should continue to discuss these issues with their respective Regional Entities. The self-certification process, with appropriate follow up with a Regional Entity, may be one means to communicate to Regional Entities the nature of one's facilities. NERC expects registered entities to be familiar with their facilities and operations and believes that they are in the best position to determine if they have the equipment and agreements in place to support their assertions of applicable Reliability Standards. In no event should NERC or Regional Entities be required to "approve" or "accept" an entity's characterizations in advance, or even thereafter, of its facilities or operations. NERC notes the Internal Revenue Service does not identify each provision of the tax code in advance to which an entity *must or need not* comply and does not develop a detailed document with respect to each individual taxpayer. NERC does not believe it is obligated to do so either.

With respect to claims that an entity does not know what Reliability Standard requirements apply, the Commission answered this question in Order No. 693 in which it made clear that an entity registered for a given function must comply with all standards applicable to that function.

94. The compliance registry identifies specific categories of users, owners and operators that correlate to the types of entities responsible for performing specific functions described in the NERC Functional Model.^[59] These same functional

types are also used by the ERO to identify the entities responsible for compliance with a particular Reliability Standard in the Applicability section of a given standard. Thus, each registered entity will be registered under one or more appropriate functional categories, and that registration by function will determine with which Reliability Standards – and Requirements of those Reliability Standards – the entity must comply. In other words, a user, owner or operator of the Bulk-Power System would be required to comply with each Reliability Standard that is applicable to any one of the functional types for which it is registered.²

Footnote 59 of Order 693 states that “[t]he Statement of Compliance Registry Criteria, as well as the Functional Model, identify, *inter alia*, the following functions: balancing authority, distribution provider, generator operator, generator owner, load serving entity, planning authority, purchasing-selling entity, transmission owner, transmission operator and transmission service provider. An entity may be registered under one or more of these functions.” Therefore, contrary to Milford’s position, there are no mysteries as to what Reliability Standards apply to a given function for which an entity is registered.

The Commission took note in the Bulk Electric System (BES) Final Rule³ of the *Ad Hoc Group for Generator Requirements at the Transmission Interface* final report referenced in Milford’s December 7 Letter.⁴ Specifically, the BES Final Rule notes that the NERC Board of Trustees “has not approved any action” on the report, and that these issues should be addressed through the standards development process.⁵ Moreover, the Commission did not seek, in that BES Final Rule, to alter mechanisms already in place for facilities that meet the criteria for registration. Contrary to the assertions of Milford, changes to standards applicable to a functional designation should be made in the first instance through the NERC Reliability Standards Development Process and not a registration appeal of a single entity. Those processes are already underway and should not be circumvented here. They also do not warrant a stay of existing and applicable Registration Criteria.

If you have any questions regarding this correspondence, please contact the undersigned.

Respectfully submitted,

/s/ Rebecca J. Michael

Rebecca J. Michael

*Assistant General Counsel for North
American Electric Reliability Corporation*

cc: Official service lists in Docket Nos. RC11-1-000 and RC11-2-000

² *Mandatory Reliability Standards for the Bulk-Power System*, Order No. 693, FERC Stats. & Regs. ¶ 31,242, order on reh’g, Order No. 693-A, 120 FERC ¶ 61,053 (2007).

³ *Revision to Electric Reliability Organization Definition of Bulk Electric System*, 133 FERC ¶ 61,150 (November 18, 2010)(“BES Final Rule”).

⁴ See *Final Report from the Ad Hoc Group for Generator Requirements at the Transmission Interface and related materials*, available at http://www.nerc.com/filez/standards/Project2010-07_GOTO_Project.html.

⁵ BES Final Rule at P 145.

ATTACHMENTS

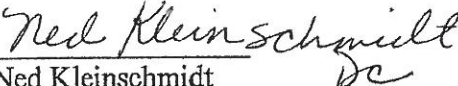
Privileged & Confidential

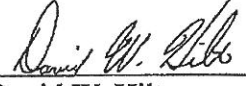
New Harquahala Generating Company Compliance With Certain TO/TOP Reliability Standards and Related Requirements

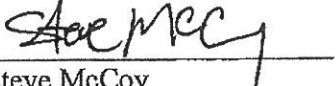
In accordance with the Federal Energy Regulatory Commission's ("Commission") order in *New Harquahala Generating Company, LLC*, 123 FERC ¶ 61,173, at P 57 (2008), the North American Electric Reliability Corporation ("NERC"), the Western Electricity Coordinating Council and New Harquahala Generating Company, LLC ("Harquahala") participated in two meetings held on June 18, 2008 and July 2, 2008 and three conference calls on July 10, 2008, July 24, 2008 and July 25, 2008 with regard to the Reliability Standards and related Requirements relating to transmission owners ("TOs") and transmission operators ("TOPs") (collectively "Requirements") that should be applicable to Harquahala as an owner of limited transmission facilities ("Harquahala transmission facilities"). In those meetings, NERC, WECC and Harquahala have resolved the following:

- (1) Based on the facts and circumstances as now known to NERC and WECC through Harquahala's representations, certain TO/TOP Requirements are currently inapplicable to Harquahala, and, therefore, that Harquahala will not need to demonstrate compliance with any such Requirements unless there is a change in the status or operations of Harquahala's transmission facilities. Such Requirements are listed as "Not Applicable" in Attachment A, hereto.
- (2) Harquahala will comply with the TO/TOP Requirements listed as "Applicable" in Attachment A, hereto.
- (3) Due to the limited nature of Harquahala's transmission facilities and the role and authority of Salt River Project ("SRP") under Harquahala's Interconnection Agreement ("IA") and other operating procedures with respect to certain TO/TOP Requirements, alternative methods of compliance will be acceptable. So long as Harquahala demonstrates compliance as set forth in Attachment B, Harquahala will be deemed in compliance with such Requirements.

Resolved this ___ day of July 2008.


Ned Kleinschmidt
Chief Executive Officer
New Harquahala Generating Company, LLC


David W. Hilt
Vice President and Director of Compliance
North American Electric Reliability
Corporation


Steve McCoy
Western Electricity Coordinating Council

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Attachment A

Final list of Applicable/Not applicable NERC TO and TOP Reliability Standards

TO-TOP Standards

FILED
07/25/08

TO/TOP Standards
Harquahala Applicability Table

Standard Number	Requirement	Standard Title	APPLICABILITY	TO	TOP	COMMENTS
BAL-005-0	R1.1	Automatic Generation Control	APPLICABLE	TO	TOP	
BAL-005-0	R1.2	Automatic Generation Control	APPLICABLE	TO	TOP	
CIP-001-1	R1	Sabotage Reporting	APPLICABLE	TO	TOP	
CIP-001-1	R2	Sabotage Reporting	APPLICABLE	TO	TOP	
CIP-001-1	R3	Sabotage Reporting	APPLICABLE	TO	TOP	
CIP-001-1	R4	Sabotage Reporting	APPLICABLE	TO	TOP	
CIP-002-1	R1.1	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-002-1	R1.1	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-002-1	R1.2	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-002-1	R1.2.1	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-002-1	R1.2.2	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-002-1	R1.2.3	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-002-1	R1.2.4	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-002-1	R1.2.5	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-002-1	R1.2.6	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-002-1	R1.2.7	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-002-1	R2	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-002-1	R3	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-002-1	R3.1	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-002-1	R3.2	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-002-1	R3.3	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-002-1	R4	Cyber Security - Critical Cyber Asset Identification	APPLICABLE	TO	TOP	
CIP-003-1	R1	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R1.1	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R1.2	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R1.3	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R2	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R2.1	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R2.2	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R2.3	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R3	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R3.1	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R3.2	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R3.3	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R4	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R4.1	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R4.2	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R4.3	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R5	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R5.1	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R5.1.1	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R5.1.2	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R5.2	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R5.3	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-003-1	R6	Cyber Security - Security Management Controls	APPLICABLE	TO	TOP	
CIP-004-1	R1	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-004-1	R2	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-004-1	R2.1	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-004-1	R2.2	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-004-1	R2.2.1	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-004-1	R2.2.2	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-004-1	R2.2.3	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-004-1	R2.2.4	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-004-1	R2.3	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-004-1	R3	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-004-1	R3.1	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-004-1	R3.2	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-004-1	R3.3	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-004-1	R4	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-004-1	R4.1	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-004-1	R4.2	Cyber Security - Personnel & Training	APPLICABLE	TO	TOP	
CIP-005-1	R1	Cyber Security - Electronic Security Perimeter(s)	APPLICABLE	TO	TOP	
CIP-005-1	R1.1	Cyber Security - Electronic Security Perimeter(s)	APPLICABLE	TO	TOP	
CIP-005-1	R1.2	Cyber Security - Electronic Security Perimeter(s)	APPLICABLE	TO	TOP	
CIP-005-1	R1.3	Cyber Security - Electronic Security Perimeter(s)	APPLICABLE	TO	TOP	
CIP-005-1	R1.4	Cyber Security - Electronic Security Perimeter(s)	APPLICABLE	TO	TOP	

This list is based on information available to NERC and WEC2 to date and is subject to revision as may be appropriate and necessary to ensure no gap exists as to maintaining the reliability of the bulk power system. This list also is subject to revision as a result of applicable FERC orders that relate to existing, pending or new Reliability Standards and Requirements. This list does NOT give applicability data for Harquahala as a NERC registered GO, GOP or BA.

TO-TOP Standards

Standard Number	Requirement	Standard Title	APPLICABILITY	TO	TOP	COMMENTS
CIP-007-1	R5.2.1.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R5.2.2.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R5.2.3.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R5.3.1.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R5.3.2.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R5.3.3.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R6.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R6.1.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R6.2.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R6.3.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R6.4.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R6.5.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R7.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R7.1.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R7.2.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R7.3.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R8.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R8.1.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R8.2.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R8.3.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R8.4.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-007-1	R9.	Cyber Security - Systems Security Management	APPLICABLE	TO	TOP	
CIP-008-1	R1.	Cyber Security - Incident Reporting and Response Planning	APPLICABLE	TO	TOP	
CIP-008-1	R1.1.	Cyber Security - Incident Reporting and Response Planning	APPLICABLE	TO	TOP	
CIP-008-1	R1.2.	Cyber Security - Incident Reporting and Response Planning	APPLICABLE	TO	TOP	
CIP-008-1	R1.3.	Cyber Security - Incident Reporting and Response Planning	APPLICABLE	TO	TOP	
CIP-008-1	R1.4.	Cyber Security - Incident Reporting and Response Planning	APPLICABLE	TO	TOP	
CIP-008-1	R1.5.	Cyber Security - Incident Reporting and Response Planning	APPLICABLE	TO	TOP	
CIP-008-1	R1.6.	Cyber Security - Incident Reporting and Response Planning	APPLICABLE	TO	TOP	
CIP-008-1	R2.	Cyber Security - Incident Reporting and Response Planning	APPLICABLE	TO	TOP	
CIP-009-1	R1.	Cyber Security - Recovery Plans for Critical Cyber Assets	APPLICABLE	TO	TOP	
CIP-009-1	R1.1.	Cyber Security - Recovery Plans for Critical Cyber Assets	APPLICABLE	TO	TOP	
CIP-009-1	R1.2.	Cyber Security - Recovery Plans for Critical Cyber Assets	APPLICABLE	TO	TOP	
CIP-009-1	R2.	Cyber Security - Recovery Plans for Critical Cyber Assets	APPLICABLE	TO	TOP	
CIP-009-1	R3.	Cyber Security - Recovery Plans for Critical Cyber Assets	APPLICABLE	TO	TOP	
CIP-009-1	R4.	Cyber Security - Recovery Plans for Critical Cyber Assets	APPLICABLE	TO	TOP	
CIP-009-1	R5.	Cyber Security - Recovery Plans for Critical Cyber Assets	APPLICABLE	TO	TOP	
COM-001-1	R1.	Telecommunications	APPLICABLE	TO	TOP	
COM-001-1	R1.1.	Telecommunications	APPLICABLE	TO	TOP	
COM-001-1	R1.2.	Telecommunications	APPLICABLE	TO	TOP	
COM-001-1	R1.3.	Telecommunications	APPLICABLE	TO	TOP	
COM-001-1	R1.4.	Telecommunications	APPLICABLE	TO	TOP	
COM-001-1	R2.	Telecommunications	APPLICABLE	TO	TOP	
COM-001-1	R3.	Telecommunications	APPLICABLE	TO	TOP	
COM-001-1	R4.	Telecommunications	APPLICABLE	TO	TOP	
COM-001-1	R5.	Telecommunications	APPLICABLE	TO	TOP	
COM-002-2	R1.	Communications and Coordination	APPLICABLE	TO	TOP	
COM-002-2	R1.1.	Communications and Coordination	APPLICABLE	TO	TOP	
COM-002-2	R2.	Communications and Coordination	APPLICABLE	TO	TOP	
EOP-001-0	R2.	Emergency Operations Planning	NOT APPLICABLE	TO	TOP	
EOP-001-0	R3.	Emergency Operations Planning	APPLICABLE	TO	TOP	
EOP-001-0	R3.1.	Emergency Operations Planning	NOT APPLICABLE	TO	TOP	
EOP-001-0	R3.2.	Emergency Operations Planning	APPLICABLE	TO	TOP	
EOP-001-0	R3.3.	Emergency Operations Planning	NOT APPLICABLE	TO	TOP	
EOP-001-0	R3.4.	Emergency Operations Planning	APPLICABLE	TO	TOP	
EOP-001-0	R4.	Emergency Operations Planning	APPLICABLE	TO	TOP	
EOP-001-0	R4.1.	Emergency Operations Planning	APPLICABLE	TO	TOP	
EOP-001-0	R4.2.	Emergency Operations Planning	APPLICABLE	TO	TOP	
EOP-001-0	R4.3.	Emergency Operations Planning	APPLICABLE	TO	TOP	
EOP-001-0	R4.4.	Emergency Operations Planning	APPLICABLE	TO	TOP	
EOP-001-0	R5.	Emergency Operations Planning	APPLICABLE	TO	TOP	
EOP-001-0	R6.	Emergency Operations Planning	APPLICABLE	TO	TOP	
EOP-001-0	R7.	Emergency Operations Planning	APPLICABLE	TO	TOP	
EOP-001-0	R7.1.	Emergency Operations Planning	APPLICABLE	TO	TOP	
EOP-001-0	R7.2.	Emergency Operations Planning	APPLICABLE	TO	TOP	
EOP-001-0	R7.3.	Emergency Operations Planning	NOT APPLICABLE	TO	TOP	
EOP-001-0	R7.4.	Emergency Operations Planning	NOT APPLICABLE	TO	TOP	
EOP-003-1	R1.	Load Shedding Plans	NOT APPLICABLE	TO	TOP	
EOP-003-1	R2.	Load Shedding Plans	NOT APPLICABLE	TO	TOP	
EOP-003-1	R3.	Load Shedding Plans	NOT APPLICABLE	TO	TOP	

TO-TOP Standards

Standard Number	Requirement	Standard Title	APPLICABILITY	TO	TOP	COMMENTS
EOP-003-1	R4.	Load Shedding Plans	NOT APPLICABLE		TOP	
EOP-003-1	R5	Load Shedding Plans	NOT APPLICABLE		TOP	
EOP-003-1	R6	Load Shedding Plans	NOT APPLICABLE		TOP	
EOP-003-1	R7	Load Shedding Plans	NOT APPLICABLE		TOP	
EOP-003-1	R8	Load Shedding Plans	NOT APPLICABLE		TOP	
EOP-004-1	R2	Disturbance Reporting	APPLICABLE		TOP	
EOP-004-1	R3	Disturbance Reporting	APPLICABLE		TOP	
EOP-004-1	R3.1	Disturbance Reporting	APPLICABLE		TOP	
EOP-004-1	R3.2	Disturbance Reporting	APPLICABLE		TOP	
EOP-004-1	R3.3	Disturbance Reporting	APPLICABLE		TOP	
EOP-004-1	R3.4	Disturbance Reporting	APPLICABLE		TOP	
EOP-005-1	R1	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R10	System Restoration Plans	NOT APPLICABLE		TOP	
EOP-005-1	R10.1	System Restoration Plans	NOT APPLICABLE		TOP	
EOP-005-1	R11	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R11.1	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R11.2	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R11.4	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R11.5	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R11.5.1	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R11.5.2	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R11.5.3	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R11.5.4	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R2	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R3	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R4	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R5	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R6	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R7	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R8	System Restoration Plans	APPLICABLE		TOP	
EOP-005-1	R9	System Restoration Plans	NOT APPLICABLE		TOP	
EOP-008-0	R1	Plans for Loss of Control Center Functionality	NOT APPLICABLE		TOP	
EOP-008-0	R1.1	Plans for Loss of Control Center Functionality	APPLICABLE		TOP	
EOP-008-0	R1.2	Plans for Loss of Control Center Functionality	APPLICABLE		TOP	
EOP-008-0	R1.3	Plans for Loss of Control Center Functionality	APPLICABLE		TOP	
EOP-008-0	R1.4	Plans for Loss of Control Center Functionality	APPLICABLE		TOP	
EOP-008-0	R1.5	Plans for Loss of Control Center Functionality	APPLICABLE		TOP	
EOP-008-0	R1.6	Plans for Loss of Control Center Functionality	APPLICABLE		TOP	
EOP-008-0	R1.7	Plans for Loss of Control Center Functionality	APPLICABLE		TOP	
EOP-008-0	R1.8	Plans for Loss of Control Center Functionality	APPLICABLE		TOP	
FAC-001-0	R1	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R1.1	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R1.2	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R1.3	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.1	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.10	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.11	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.12	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.13	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.14	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.15	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.16	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.2	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.3	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.4	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.5	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.6	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.7	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.8	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R2.1.9	Facility Connection Requirements	APPLICABLE		TO	
FAC-001-0	R3	Facility Connection Requirements	APPLICABLE		TO	
FAC-002-0	R1	Coordination of Plans For New Generation, Transmission, and End-User	APPLICABLE		TO	
FAC-002-0	R1.1	Coordination of Plans For New Generation, Transmission, and End-User	APPLICABLE		TO	
FAC-002-0	R1.2	Coordination of Plans For New Generation, Transmission, and End-User	APPLICABLE		TO	
FAC-002-0	R1.3	Coordination of Plans For New Generation, Transmission, and End-User	APPLICABLE		TO	
FAC-002-0	R1.4	Coordination of Plans For New Generation, Transmission, and End-User	APPLICABLE		TO	
FAC-002-0	R1.5	Coordination of Plans For New Generation, Transmission, and End-User	APPLICABLE		TO	
FAC-002-0	R2	Coordination of Plans For New Generation, Transmission, and End-User	APPLICABLE		TO	
FAC-003-1	R1	Vegetation Management Program	APPLICABLE		TO	
FAC-003-1	R1.1	Vegetation Management Program	APPLICABLE		TO	

TO-TOP Standards

Standard Number	Requirement	Standard Title	APPLICABILITY	TO	TOP	COMMENTS
FAC-003-1	R1.2.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R1.2.1.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R1.2.2.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R1.2.2.1.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R1.2.2.2.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R1.3.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R1.4.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R1.5.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R2.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R3.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R3.1.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R3.2.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R3.3.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R3.4.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R3.4.1.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R3.4.2.	Vegetation Management Program	APPLICABLE	TO		
FAC-003-1	R3.4.3.	Vegetation Management Program	APPLICABLE	TO		
FAC-008-1	R1.	Facility Ratings Methodology	APPLICABLE	TO		
FAC-008-1	R1.1.	Facility Ratings Methodology	APPLICABLE	TO		
FAC-008-1	R1.2.	Facility Ratings Methodology	APPLICABLE	TO		
FAC-008-1	R1.2.1.	Facility Ratings Methodology	APPLICABLE	TO		
FAC-008-1	R1.2.2.	Facility Ratings Methodology	APPLICABLE	TO		
FAC-008-1	R1.3.	Facility Ratings Methodology	APPLICABLE	TO		
FAC-008-1	R1.3.1.	Facility Ratings Methodology	APPLICABLE	TO		
FAC-008-1	R1.3.2.	Facility Ratings Methodology	APPLICABLE	TO		
FAC-008-1	R1.3.3.	Facility Ratings Methodology	APPLICABLE	TO		
FAC-008-1	R1.3.4.	Facility Ratings Methodology	APPLICABLE	TO		
FAC-008-1	R1.3.5.	Facility Ratings Methodology	APPLICABLE	TO		
FAC-008-1	R2.	Facility Ratings Methodology	APPLICABLE	TO		
FAC-008-1	R3.	Facility Ratings Methodology	APPLICABLE	TO		
FAC-009-1	R1.	Establish and Communicate Facility Ratings	APPLICABLE	TO		
FAC-009-1	R2.	Establish and Communicate Facility Ratings	APPLICABLE	TO		
FAC-010-1	R4.2	System Operating Limits Methodology for the Planning Horizon	NOT APPLICABLE	TO	TOP	
FAC-011-1	F4.3	System Operating Limits Methodology for the Operations Horizon	NOT APPLICABLE	TO	TOP	
FAC-014-1	R2.	Establish and Communicate System Operating Limits	NOT APPLICABLE	TO	TOP	
FAC-014-1	R5.2.	Establish and Communicate System Operating Limits	NOT APPLICABLE	TO	TOP	
INT-004-1	R1.	Dynamic Interchange Transaction Modifications	APPLICABLE	TO	TOP	
IRO-001-1	R8.	Reliability Coordination – Responsibilities and Authorities	APPLICABLE	TO	TOP	
IRO-002-1	R3.	Reliability Coordination – Facilities	APPLICABLE	TO	TOP	
IRO-004-1	R4.	Reliability Coordination - Operations Planning	APPLICABLE	TO	TOP	
IRO-004-1	R7.	Reliability Coordination - Operations Planning	APPLICABLE	TO	TOP	
IRO-005-1	R12.	Reliability Coordination - Current-Day Operations	APPLICABLE	TO	TOP	
IRO-005-1	R13.	Reliability Coordination – Current-Day Operations	APPLICABLE	TO	TOP	
IRO-005-1	R8.	Reliability Coordination – Current-Day Operations	APPLICABLE	TO	TOP	
IRO-005-1	R9.	Reliability Coordination – Current-Day Operations	APPLICABLE	TO	TOP	
MOD-010-0	R1.	Steady-State Data for Modeling and Simulation of the Interconnected Transmission System	APPLICABLE	TO		
MOD-010-0	R2.	Steady-State Data for Modeling and Simulation of the Interconnected Transmission System	APPLICABLE	TO		
MOD-012-0	R1.	Dynamics Data for Modeling and Simulation of the Interconnected Transmission System	NOT APPLICABLE	TO		
MOD-012-0	R2.	Dynamics Data for Modeling and Simulation of the Interconnected Transmission System	NOT APPLICABLE	TO		
PER-001-0	R1.	Operating Personnel Responsibility and Authority	APPLICABLE	TO	TOP	
PER-002-0	R1.	Operating Personnel Training	APPLICABLE	TO	TOP	
PER-002-0	R2.	Operating Personnel Training	APPLICABLE	TO	TOP	
PER-002-0	R2.1.	Operating Personnel Training	APPLICABLE	TO	TOP	
PER-002-0	R2.2.	Operating Personnel Training	APPLICABLE	TO	TOP	
PER-002-0	R3.	Operating Personnel Training	APPLICABLE	TO	TOP	
PER-002-0	R3.1.	Operating Personnel Training	APPLICABLE	TO	TOP	
PER-002-0	R3.2.	Operating Personnel Training	APPLICABLE	TO	TOP	
PER-002-0	R3.3.	Operating Personnel Training	APPLICABLE	TO	TOP	
PER-002-0	R3.4.	Operating Personnel Training	APPLICABLE	TO	TOP	
PER-002-0	R4.	Operating Personnel Training	APPLICABLE	TO	TOP	
PER-003-0	R1.	Operating Personnel Credentials	APPLICABLE	TO	TOP	
PER-003-0	R1.1.	Operating Personnel Credentials	APPLICABLE	TO	TOP	
PER-003-0	R1.2.	Operating Personnel Credentials	APPLICABLE	TO	TOP	
PRC-001-1	R1.	System Protection Coordination	APPLICABLE	TO	TOP	
PRC-001-1	R2.	System Protection Coordination	APPLICABLE	TO	TOP	
PRC-001-1	R3.	System Protection Coordination	APPLICABLE	TO	TOP	
PRC-001-1	R3.1.	System Protection Coordination	APPLICABLE	TO	TOP	
PRC-001-1	R3.2.	System Protection Coordination	APPLICABLE	TO	TOP	
PRC-001-1	R4.	System Protection Coordination	APPLICABLE	TO	TOP	
PRC-001-1	R5.	System Protection Coordination	APPLICABLE	TO	TOP	
PRC-001-1	R5.2.	System Protection Coordination	APPLICABLE	TO	TOP	

TO-TOP Standards

Standard Number	Requirement	Standard Title	APPLICABILITY	TO	TOP	COMMENTS
PRC-018-1	R6.1	Disturbance Monitoring Equipment Installation and Data Reporting	NOT APPLICABLE	TO		
PRC-018-1	R6.2	Disturbance Monitoring Equipment Installation and Data Reporting	NOT APPLICABLE	TO		
PRC-021-1	R1	Under-Voltage Load Shedding Program Data	NOT APPLICABLE	TO		
PRC-021-1	R1.1	Under-Voltage Load Shedding Program Data	NOT APPLICABLE	TO		
PRC-021-1	R1.2	Under-Voltage Load Shedding Program Data	NOT APPLICABLE	TO		
PRC-021-1	R1.3	Under-Voltage Load Shedding Program Data	NOT APPLICABLE	TO		
PRC-021-1	R1.4	Under-Voltage Load Shedding Program Data	NOT APPLICABLE	TO		
PRC-021-1	R1.5	Under-Voltage Load Shedding Program Data	NOT APPLICABLE	TO		
PRC-022-1	R2	Under-Voltage Load Shedding Program Data	NOT APPLICABLE	TO		
PRC-022-1	R1.1	Under-Voltage Load Shedding Program Performance	NOT APPLICABLE	TO		
PRC-022-1	R1.2	Under-Voltage Load Shedding Program Performance	NOT APPLICABLE	TO		
PRC-022-1	R1.3	Under-Voltage Load Shedding Program Performance	NOT APPLICABLE	TO		
PRC-022-1	R1.4	Under-Voltage Load Shedding Program Performance	NOT APPLICABLE	TO		
PRC-022-1	R1.5	Under-Voltage Load Shedding Program Performance	NOT APPLICABLE	TO		
PRC-022-1	R2	Under-Voltage Load Shedding Program Performance	NOT APPLICABLE	TO		
TOP-001-1	R1	Reliability Responsibilities and Authorities	APPLICABLE	TOP		
TOP-001-1	R2	Reliability Responsibilities and Authorities	APPLICABLE	TOP		
TOP-001-1	R3	Reliability Responsibilities and Authorities	APPLICABLE	TOP		
TOP-001-1	R5	Reliability Responsibilities and Authorities	APPLICABLE	TOP		
TOP-001-1	R6	Reliability Responsibilities and Authorities	APPLICABLE	TOP		
TOP-001-1	R7	Reliability Responsibilities and Authorities	APPLICABLE	TOP		
TOP-001-1	R7.1	Reliability Responsibilities and Authorities	APPLICABLE	TOP		
TOP-001-1	R7.2	Reliability Responsibilities and Authorities	APPLICABLE	TOP		
TOP-001-1	R7.3	Reliability Responsibilities and Authorities	APPLICABLE	TOP		
TOP-001-1	R8	Reliability Responsibilities and Authorities	APPLICABLE	TOP		
TOP-002-2	R1	Normal Operations Planning	APPLICABLE	TOP		
TOP-002-2	R10	Normal Operations Planning	NOT APPLICABLE	TOP		
TOP-002-2	R11	Normal Operations Planning	NOT APPLICABLE	TOP		
TOP-002-2	R16	Normal Operations Planning	APPLICABLE	TOP		
TOP-002-2	R16.1	Normal Operations Planning	APPLICABLE	TOP		
TOP-002-2	R16.2	Normal Operations Planning	APPLICABLE	TOP		
TOP-002-2	R17	Normal Operations Planning	APPLICABLE	TOP		
TOP-002-2	R18	Normal Operations Planning	APPLICABLE	TOP		
TOP-002-2	R19	Normal Operations Planning	APPLICABLE	TOP		
TOP-002-2	R2	Normal Operations Planning	APPLICABLE	TOP		
TOP-002-2	R4	Normal Operations Planning	APPLICABLE	TOP		
TOP-002-2	R5	Normal Operations Planning	APPLICABLE	TOP		
TOP-002-2	R6	Normal Operations Planning	APPLICABLE	TOP		
TOP-003-0	R1	Planned Outage Coordination	APPLICABLE	TOP		
TOP-003-0	R1.1	Planned Outage Coordination	APPLICABLE	TOP		
TOP-003-0	R1.2	Planned Outage Coordination	APPLICABLE	TOP		
TOP-003-0	R1.3	Planned Outage Coordination	APPLICABLE	TOP		
TOP-003-0	R2	Planned Outage Coordination	APPLICABLE	TOP		
TOP-003-0	R3	Planned Outage Coordination	APPLICABLE	TOP		
TOP-004-1	R1	Transmission Operations	NOT APPLICABLE	TOP		
TOP-004-1	R2	Transmission Operations	NOT APPLICABLE	TOP		
TOP-004-1	R3	Transmission Operations	NOT APPLICABLE	TOP		
TOP-004-1	R4	Transmission Operations	NOT APPLICABLE	TOP		
TOP-004-1	R5	Transmission Operations	NOT APPLICABLE	TOP		
TOP-004-1	R6	Transmission Operations	APPLICABLE	TOP		
TOP-004-1	R6.1	Transmission Operations	APPLICABLE	TOP		
TOP-004-1	R6.2	Transmission Operations	APPLICABLE	TOP		
TOP-004-1	R6.3	Transmission Operations	APPLICABLE	TOP		
TOP-004-1	R6.4	Transmission Operations	APPLICABLE	TOP		
TOP-004-1	R6.5	Transmission Operations	APPLICABLE	TOP		
TOP-004-1	R6.6	Transmission Operations	NOT APPLICABLE	TOP		
TOP-005-1	R1	Operational Reliability Information	APPLICABLE	TOP		
TOP-006-1	R1	Monitoring System Conditions	APPLICABLE	TOP		
TOP-006-1	R1.2	Monitoring System Conditions	APPLICABLE	TOP		
TOP-006-1	R2	Monitoring System Conditions	APPLICABLE	TOP		
TOP-006-1	R3	Monitoring System Conditions	APPLICABLE	TOP		
TOP-006-1	R4	Monitoring System Conditions	APPLICABLE	TOP		
TOP-006-1	R5	Monitoring System Conditions	APPLICABLE	TOP		
TOP-006-1	R6	Monitoring System Conditions	APPLICABLE	TOP		
TOP-006-1	R7	Monitoring System Conditions	APPLICABLE	TOP		
TOP-007-0	R1	Reporting System Operating Limit (ROL) and Interconnection Reliability Operating Limit (IROL)	NOT APPLICABLE	TOP		
TOP-007-0	R2	Reporting System Operating Limit (ROL) and Interconnection Reliability Operating Limit (IROL)	NOT APPLICABLE	TOP		
TOP-007-0	R3	Reporting System Operating Limit (ROL) and Interconnection Reliability Operating Limit (IROL)	NOT APPLICABLE	TOP		
TOP-008-1	R1	Response to Transmission Limit Violations	NOT APPLICABLE	TOP		
TOP-008-1	R2	Response to Transmission Limit Violations	NOT APPLICABLE	TOP		
TOP-008-1	R3	Response to Transmission Limit Violations	NOT APPLICABLE	TOP		

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Standard Number	Requirement	Standard Title	APPLICABILITY	TO	TOP	COMMENTS
TOP-008-1	R4.	Response to Transmission Limit Violations	NOT APPLICABLE		TOP	
VAR-001-1	R1.	Voltage and Reactive Control	APPLICABLE		TOP	
VAR-001-1	R10.	Voltage and Reactive Control	NOT APPLICABLE		TOP	
VAR-001-1	R11.	Voltage and Reactive Control	NOT APPLICABLE		TOP	
VAR-001-1	R12.	Voltage and Reactive Control	NOT APPLICABLE		TOP	
VAR-001-1	R2.	Voltage and Reactive Control	NOT APPLICABLE		TOP	
VAR-001-1	R3.	Voltage and Reactive Control	NOT APPLICABLE		TOP	
VAR-001-1	R3.1.	Voltage and Reactive Control	NOT APPLICABLE		TOP	
VAR-001-1	R3.2.	Voltage and Reactive Control	NOT APPLICABLE		TOP	
VAR-001-1	R4.	Voltage and Reactive Control	APPLICABLE		TOP	
VAR-001-1	R6.	Voltage and Reactive Control	NOT APPLICABLE		TOP	
VAR-001-1	R6.1.	Voltage and Reactive Control	NOT APPLICABLE		TOP	
VAR-001-1	R7.	Voltage and Reactive Control	NOT APPLICABLE		TOP	
VAR-001-1	R8.	Voltage and Reactive Control	NOT APPLICABLE		TOP	
VAR-001-1	R9.	Voltage and Reactive Control	NOT APPLICABLE		TOP	
VAR-001-1	R9.1.	Voltage and Reactive Control	NOT APPLICABLE		TOP	

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Attachment B

Standard	Requirement Nos.	Harquahala's Method of Compliance
EOP-001	R3, R3.2, R3.4, R4, R4.1, R4.2, R4.3, R4.4, R5, R6, R7, R7.1, R7.3	<p>It is understood that:</p> <p>(1A) WECC and Harquahala agree that there would only be a limited set of operating emergencies that could affect the Harquahala transmission facilities, for example, (i) a physical problem with the Harquahala transmission facilities, or (ii) voltage and frequency excursions — the cause of which occurs downstream of Harquahala's transmission facilities (<i>i.e.</i>, in the Hassayampa Switchyard or beyond). Harquahala will identify these operating emergencies and ensure that a plan is developed to address each one, including operating emergencies that could necessitate Harquahala de-energizing the line from its end by manually opening the breakers.</p> <p>(1B) As to voltage and frequency excursions on the Harquahala transmission facilities, the only actions Harquahala is currently able to take to mitigate such emergencies is to operate its generating facility in a particular manner. Under its interconnection agreement with SRP, Harquahala is obligated to take direction from SRP to resolve such issues (IA §§ 8.4, 9.4);</p> <p>(1C) Harquahala will satisfy R3.4 as described below under EOP-005 (system restoration plan); and</p> <p>(1D) In addition to the above, Harquahala will comply with R5 to the extent any of the elements in Attachment 1 apply and Harquahala will fully comply with R6, R7.1, and R7.3.</p>
EOP-005	R1, R2, R3, R4, R5, R6, R7, R11, R11.1, R11.2, R11.4, R11.5, R11.5.1, R11.5.2, R11.5.3, R11.5.4	<p>While only limited requirements set forth in Attachment 1 of EOP-005 may apply, to satisfy R1, Harquahala will develop a Restoration Plan that documents and describes the steps Harquahala will take to restore the Harquahala transmission facilities. Because currently the only source to restore the Harquahala transmission facilities is from the SRP system, the plan must be coordinated with SRP. Such coordination will be described in Harquahala's Restoration Plan.</p> <p>The Restoration Plan and the procedure to return the Harquahala transmission facilities to service following forced or scheduled outages may be similar.</p>
EOP-008	R1, R1.1, R1.2, R1.3, R1.4, R1.5, R1.6, R1.7, R1.8	<p>As long as Constellation Energy Control and Dispatch ("CECD") (or another provider) is performing or has responsibility for the performance of all of the TOP functions for Harquahala, CECD's plans and backup center will satisfy these Requirements. (This statement assumes that the Loss of Control Center plans that CECD (or another provider) has in place are fully compliant with the requirements of EOP-008.)</p>

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		For the avoidance of doubt, to satisfy the requirements of EOP-008, it is not necessary for the Harquahala generating control center to have backup control center plans because no TOP functions will be performed from the generating control center unless they are performed under the direction of the CECD operator.
FAC-001	R1, R1.1, R1.2, R1.3, R2, R2.1, R2.1.1, R2.1.2, R2.1.3, R2.1.4, R2.1.5, R2.1.6, R2.1.7, R2.1.8, R2.1.9, R2.1.10, R2.1.11, R2.1.12, R2.1.13, R2.1.14, R2.1.15, R2.1.16, R3	<p>Because Harquahala does not know what equipment would be required for a specific interconnection to the Harquahala transmission facilities, to satisfy these Requirements, Harquahala will generally describe the factors it will consider if interconnection is requested, including any necessary coordination with SRP, and the necessity of installing certain equipment for measuring interconnection capability. Harquahala will not be required to publicly publish its facility connection requirements, but Harquahala will provide them upon request, as required in R3.</p> <p>If Harquahala were to receive a request for interconnection, Harquahala will work with the requesting entity to develop full interconnection requirements in a timely manner.</p>
MOD-010	R1, R2	Harquahala will be responsible for meeting the steady-state data reporting requirements specified in requirements R1 and R2 by providing the data directly to WECC or to its sub-regional or regional coordinator.
MOD-012	R1, R2	Harquahala will be responsible for meeting the dynamic data reporting requirements specified in requirements R1 and R2 by providing the data directly to WECC or to its sub-regional or regional coordinator. To the extent that Harquahala currently has no equipment on its transmission facilities that need to be included in system dynamics modeling this standard will be non-applicable.
PER-001	R1	It is understood that:
PER-003	R1, R1.1, R1.2	<p>(2A) All requirements which fall under the TOP function must be performed by or under the direction of or in coordination with a NERC certified operator.</p> <p>(2B) Harquahala personnel performs switching in accordance with the procedure set forth in Appendix 1, hereto (“Switching Procedure”);</p> <p>(2C) The Harquahala personnel engaged in the activities described in the Switching Procedure need not be NERC-certified operators, but must act under the direction of or in coordination with a NERC certified operator.</p> <p>Given the understandings set forth above, to satisfy these Requirements, Harquahala will contract with CECD (or another service provider), and CECD (or another service provider) will train its personnel in those TO/TOP functions necessary for operations of the Harquahala transmission facilities, which Harquahala states are limited. For the avoidance of doubt, to satisfy these Requirements, so long as CECD’s</p>

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		NERC certified operators (which are not located at the Harquahala site) are providing TOP services to Harquahala and addressing these Requirements, it will not be necessary for Harquahala to have NERC certified operators on-site at its generating facility or switchyard.
PER-002	R1, R2, R2.1, R2.2, R3, R3.1, R3.2, R3.3, R3.4, R4,	To satisfy these Requirements, Harquahala will contract with CECD (or another service provider), and CECD (or another service provider) will train its personnel in those TO/TOP functions necessary for operation of the Harquahala transmission facilities, which are limited.
PRC-001	R2.2	To satisfy R2.2, Harquahala will document that its Reliability Coordinator has indicated that it does not want information from Harquahala regarding a protective relay or equipment failure, because Harquahala cannot assess whether system reliability is reduced. Harquahala will request its Reliability Coordinator to provide written confirmation of this position that Harquahala will include such written confirmation in its documentation to satisfy R2.2. Harquahala will communicate information related to any protective relay or equipment failure to its TOP services provider. Harquahala's procedure containing this information will be sufficient for compliance as long as Harquahala takes corrective action as soon as possible.
TOP-001	R1, R2, R5, R8	<p>It is understood that:</p> <p>(3A) There would only be a limited set of operating emergencies that could affect the Harquahala transmission facilities, for example, (i) a physical problem with the Harquahala transmission facilities and other associated transmission facilities, or (ii) voltage and frequency excursions—the cause of which occurs downstream of Harquahala's transmission facilities (<i>i.e.</i>, in the Hassayampa Switchyard or beyond);</p> <p>(3B) As to voltage and frequency excursions on the Harquahala transmission facilities, the only actions Harquahala is currently able to take to mitigate such emergencies is to operate its generating facility pursuant to its interconnection agreement with SRP, under which Harquahala is obligated to take direction from SRP to resolve such issues (IA §§ 8.4, 9.4);</p> <p>(3C) The Harquahala transmission facilities are normally de-energized by operating circuit breakers located in the Hassayampa Switchyard under the direct control of SRP. The Harquahala generating facilities are not normally operated for the purpose of serving isolated station service load. The Harquahala generating facilities are never used to energize the Harquahala-Hassayampa 500 kV transmission line.</p> <p>Given the understandings set forth in (3A) through (3C) above, to satisfy R1, R2 and R5, Harquahala: (i) will immediately upon discovery notify the appropriate SRP personnel of any issue Harquahala identifies</p>

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		<p>as to the Harquahala transmission facilities that may require de-energization of the Harquahala transmission facilities, and request that SRP de-energize the Harquahala transmission facilities to mitigate or avoid the emergency condition, with the further understanding that Harquahala states it has no ability or authority to ensure that SRP fulfills such a request; and (ii) as to frequency and voltage excursions, Harquahala states that it currently can take no action on the Harquahala transmission facilities or other transmission facilities to address such situations. If, however, Harquahala de-energizes the line from its end by manually opening the breakers, Harquahala must fully comply with R1, R2 and R5, as applicable.</p> <p>Given the understandings set forth in (3A) through (3C) above, to satisfy R8, Harquahala will follow the directives of SRP. If, however, Harquahala de-energizes the line from its end by manually opening the breakers, Harquahala must fully comply with R8.</p>
TOP-002	R2, R4, R5, R6, R19	<p>To satisfy these Requirements, Harquahala/CECD would not be required to take any action above and beyond that specified for the Balancing Authority function to the extent the Balancing Authority is fully meeting the requirements. As to R2, the system planning, design and study procedures are performed at the Transmission Planner and WECC level. As to R19, computer modeling used for analyzing and planning system operations is covered at the sub-regional coordinator, regional coordinator and/or WECC level.</p>
VAR-001	R1, R4	<p>It is understood that:</p> <p>(4A) The only action Harquahala can take to affect voltage on the Harquahala transmission facilities is to adjust the operation of its generating facility;</p> <p>(4B) Under the IA, Harquahala must, as a generator, comply with the voltage schedules set by SRP (established at Hassayampa Switch yard) accounting for any voltage loss in the 500 kV line. The voltage drop or rise in the transmission line is well established and understood by the generator operator. IA § 9.4; <i>see also</i> Palo Verde Transmission System, Hassayampa Voltage Operating Procedure, Procedure No. PVTS-04, Revision 1, Section 7.4, Section 8; SRP Generator Voltage Schedule at the Point of Interconnection, dated 4/30/08 and any revisions thereto.</p> <p>(4C) Despite Harquahala being the TOP for the Harquahala transmission facilities, for the Requirements under VAR-002, Harquahala as a GOP will take direction from SRP as TOP and not from Harquahala as TOP accounting for any voltage drop or rise in the 500 kV line.</p> <p>Given the understandings set forth in (4A) through (4C) above, to satisfy R1, Harquahala will comply with the voltage schedule required and prepared by SRP and any directives of SRP relative to voltage and</p>

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		<p>reactive control, and Harquahala's NERC-certified operators (<i>i.e.</i>, CECD) will monitor the voltage levels and MVar flows on the Harquahala transmission facilities.</p> <p>Given the understandings set forth in (4A) through (4C) above, to satisfy R4, Harquahala will not develop its own voltage or Reactive Power schedules, but will adopt the voltage or Reactive Power schedules prescribed by, and the directives of, SRP. To the extent SRP has provided no voltage or Reactive Power schedules and provided no directives thereto, Harquahala will maintain unity.</p>
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Appendix 1
Switching Procedure

	NEW HARQUAHALA GENERATING OPERATIONS AND MAINTENACE PROGRAM	OPS-01-06
		REVISION #:
SWITCHYARD SWITCHING PERMIT		REV DATE:
		NEAS #:

DOCUMENT TITLE/SUBJECT: 500kV Switchyard Work Permit

DOCUMENT NUMBER: OPS-01-06

ORIGINATION DATE: October 15, 2002

REVISION DATE:

REVISION NUMBER:


NUMBER OF PAGES: 16

AUTHOR: _____
Michael Kohrt

REVIEWED BY: _____
Jacob Mattingly

REVIEWED BY: _____
Denise Ayers (or CECD Representative)

APPROVED BY: _____
Malcolm Hubbard

	NEW HARQUAHALA GENERATING OPERATIONS AND MAINTENACE PROGRAM	OPS-01-06
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REVISION HISTORY

REVISION	REASON FOR REVISION	DATE	APPROVED BY
1	Added Attachment 6.4 and line 1.1.6	November 12, 2002	MJH
2	Content change to include vehicle rules	August 7, 2007	MJH
	Content change to include specificity for communications and coordination with CECD and SRP		


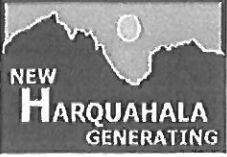
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1.0 Purpose

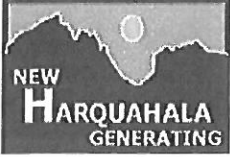
- 1.1 To provide the necessary process control to protect personnel and equipment whenever the following 500kV switchyard activities are to be performed:
 - 1.1.1 Energization of the Harquahala Switchyard
 - 1.1.2 De-energizing of the Harquahala Switchyard for maintenance
 - 1.1.3 Providing and/or obtaining a Hassayampa "hold out"
 - 1.1.4 Modifying breaker/switch positions
 - 1.1.5 De-energizing a portion of the Switchyard for maintenance
 - 1.1.6 Conducting any work in the switchyard requires control room concurrence
 - 1.1.7 Contractors require NHGC escorts at all times regardless of work performed

2.0 Responsibilities

- 2.1 The O&M Manager is responsible for the Content and Periodic Review of this procedure.
- 2.2 The Plant Manager shall provide the final review and approval signature for this procedure.
- 2.3 CECD shall review this procedure for acceptance and conformance to existing CECD procedures.

3.0 Special Instructions/Precautions

- 3.1 The work supervisor shall stop the work in progress if a plant condition affects the safety of personnel performing the activity, or if it is discovered that the conditions have changed or are not properly identified by the permit.
- 3.2 A switching order permit is not required if the task is:
 - 3.2.1 Controlled by a specific procedure which addresses all of the applicable safety and authorization requirements of this procedure
 - 3.2.2 For an evolution whose device manipulation is controlled under an existing "hold out" and is controlled as a outage/testing event.
- 3.3 Only personnel listed on the switching order permit shall be allowed to perform the work as stated on the permit. These personnel shall be trained on the requirements of this procedure and the applicable safety checklist/procedure requirements.
- 3.4 Vehicles are not permitted in the switchyard without control room authorization. All vehicles entering and exiting the switchyard will be logged in the control room log book.

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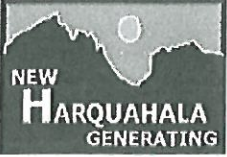
4.0 Procedure

4.1 Definitions

- 4.1.1 Switchyard Switching Permit - A document intended to identify hazardous work and to specify the procedural safety measures, equipment required to perform the work in a safe manner and the personnel authorized to perform the work.
- 4.1.2 Work Supervisor - Individual responsible for the "switching" activity and trained in this procedure.
- 4.1.3 Energizing of the Switchyard – The placing of 500kV into the switchyard boundaries after the yard was isolated for maintenance or a "hold out".
- 4.1.4 De-Energizing of the Switchyard for a maintenance activity – Removing the electrical potential from all components of the switchyard to allow for a safe maintenance activity.
- 4.1.5 Providing and/or obtaining a Hassayampa "hold out" – Providing Salt River Project (SRP) a guarantee of de-energization or obtaining a (SRP) guarantee of de-energization at the Hassayampa Sub-station.
- 4.1.6 Modifying breaker/switch positions – Making a change to the breaker positions and/or switches that reside inside the 500kV switchyard.
- 4.1.7 De-energizing a portion of the Switchyard for maintenance – Placing the positions of various breakers and switches in positions allowing for continuous operations of the generating plant, while allowing for a "hold out" in the yard for a maintenance activity.
- 4.1.8 "Hold Out" – A lock out guarantee provided for the specific use in the 500 kV Switchyard.
- 4.1.9 "Black Plant" – A condition in which all electrical power at the facility is lost, requiring reliance on emergency battery station power.

4.2 Initiation of the switching order permit

- 4.2.1 The work supervisor shall fill out part A of Attachment 6.1 and submit to the Lead Operations & Maintenance Technician.
- 4.2.2 The Lead Operations & Maintenance Technician shall verify that plant operating conditions will allow the requested work to be performed.
- 4.2.3 If necessary, the Lead O&M Technician or his designee will initiate lockout/tagout to provide a "Hold Out". (6.3)
- 4.2.4 The Lead Operation & Maintenance Technician shall discuss the Switchyard Switching permit specifications with the work supervisor and the Operations & Maintenance Manager and will indicate that the plant can support the requested permit requested by signing part A of the work permit.

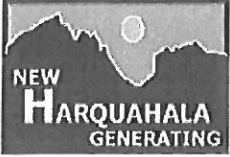
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4.3 Switching Order Permit Review and Concurrence

- 4.3.1 The work supervisor shall ensure that the work site has undergone proper safety preparation by performing the applicable checklist on the two sided "safety check list" form (Attachment 6.2). Put checkmark(s) where applicable.
- 4.3.2 The work supervisor shall indicate approval of the work permit by signing part B of Attachment 6.1.
- 4.3.3 The Switchyard Switching Permit shall be submitted to the SRP PDO and Constellation Energy and Control and Dispatch Reliability Coordinator certified operator ("CECD Operator") for final review and concurrence. The Reliability Coordinator certified operator shall indicate uniformity of the work permit with established procedures by signing part C of Attachment 6.1.
- 4.3.4 Upon final approvals the CECD Operator shall transfer the Switching Order to SRP PDO and NHGC personnel for execution.
- 4.3.5 A copy of the switchyard permit is to be retained in the NHGC control room and the CECD control room.
- 4.3.6 The work supervisor shall inform the Lead Operations & Maintenance Technician that the Switchyard work has commenced. The Lead Operations & Maintenance Technician shall relay that information to the CECD Operator.
- 4.3.7 If the permit is a switching order, the Lead Operations & Maintenance Technician or his/her designee will be involved at the switchyard.
- 4.3.8 The work supervisor shall ensure that the switching order permit is visibly posted in the vicinity of the work area.
- 4.3.9 The CECD Operator will provide oversight of all switching operations via remote monitoring and communications with the NHGC control room.
- 4.3.10 The NHGC control room and CECD control room shall be manned at all times during switching operations and all communications shall take place between the control room personnel.

4.4 Closing Switching Order Permit

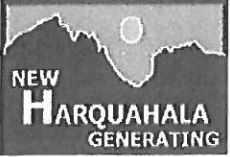
- 4.4.1 The work supervisor shall inform the Lead Operations & Maintenance Technician when the Switchyard work has been completed.
- 4.4.2 The work supervisor shall debrief any contractors at the end of the activity in regards to the permit program and any hazards confronted or created. This debrief should include a count of all protection devices (if applicable) and notation on Attachment 6.2.
- 4.4.3 The work supervisor shall indicate that work is complete by signing part D of Attachment 6.1 and ensuring this signed work permit is provided to the control room for retention.

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- 4.4.4 If applicable, The Lead Operations & Maintenance Technician will contact the parties entered on the permit for the "Hold Out" and notify them that the "Hold Out" is to be released.
- 4.4.5 The Lead Operations & Maintenance Technician will coordinate with the Operations & Maintenance Manager and CECD Operator as well other parties involved to review and establish the "released" position of all switchyard devices.
- 4.4.6 The Lead Operations & Maintenance Technician and the CECD operator will indicate concurrence with the "released" position of all switchyard devices and affirm repositioning of necessary equipment by signing Part D of Attachment 6.1.
- 4.4.7 The Lead Operations & Maintenance Technician will perform or have a designee perform the removal of the Lockout and establish the "released" position of the breakers and switches.
- 4.4.8 The CECD Operator will provide oversight of all switching operations via remote monitoring and communications with the NHGC control room.
- 4.4.9 The NHGC control room and CECD control room shall be manned at all times during switching operations and all communications shall take place between the control room personnel.
- 4.4.10 Completed work permits will be retained in the Hazardous Permit workbook for a period of one year.

4.5 Emergency Operations

- 4.5.1 Periodically NHGC may experience emergency situations that take the transmission line out of service unexpectedly resulting in a "black plant" situation. In this event it may be necessary to take immediate actions to restore power to the facility in an expeditious manner to prevent damage to equipment. Failure to take action in a timely fashion for these occurrences could result in significant forced outages of the facility.
- 4.5.2 In an emergency situation requiring the immediate re-energization of the NHGC facility to prevent a forced outage state of the facility generators, the use of attachment 6.1 will be waived. The Lead Operations and Maintenance Technicia shall coordinate switching operations verbally with the Operations and Maintenance Manager, the CECD Operator, and the SRP PDO as follows:
 - 4.5.2.1 Following re-energization of the line from the SRP PDO, the Lead Operations and Maintenance Technician shall contact the Operations and Maintenance Manager, the CECD Operator and the SRP PDO to verbally establish a switching order for re-energization of the generating facility. The discussion of the switching order shall utilize the diagram contained in Attachment 6.5 for reference by all parties.

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- 4.5.2.2 The Lead Operations and Maintenance Technician shall fill out attachment 6.2 and a switching order consistent with switching order verbally agreed to with SRP and CECD.
- 4.5.2.3 The Lead Operations and Maintenance Technician shall perform a pre-job briefing with the on-site operator performing the switching. Upon completion of the pre-job briefing the Lead Operations and Maintenance Technician shall inform SRP and CECD that switching has commenced.
- 4.5.2.4 The CECD Operator will provide oversight of all switching operations via remote monitoring and communications with the NHGC control room.
- 4.5.2.5 The NHGC control room and CECD control room shall be manned at all times during switching operations and all communications shall take place between the control room personnel.
- 4.5.2.6 The Lead Operations and Maintenance Technician shall inform the Operations and Maintenance Manager, CECD, and SRP when switching is completed.

5.0 Review of Hazardous Work Permit Program


- 5.1.1 The permit program shall be reviewed and deficiencies corrected if:
- 5.1.2 Detection of condition not covered by permit.
- 5.1.3 Occurrence of injury or near miss during entry.
- 5.1.4 Any employee complaints.
- 5.1.5 At least annually using information from entries over the last 12 months.

6.0 References

- 6.1 N/A

7.0 Attachments

- 7.1 Switchyard Work Permit
- 7.2 Mechanical/Electrical Safety Checklist
- 7.3 Hold out required Checklist
- 7.4 Example Switching Order
- 7.5 Switchyard Diagram

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ATTACHMENT 6.1

SWITCHYARD WORK PERMIT

Part A - Initiation

1. To Be Completed by Work Supervisor (Use "N/A" in fields not required)

a. Indicate type of permit requested.

- Switchyard Activity
 Switchyard Switching Order

b. Description _____ of _____ Work/Location:

c. Personnel performing work:

PERSONNEL	DUTIES	SAFETY PERSONNEL (If Required)
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. To Be Completed by LOM or LOM's Designee

- | | |
|---|--|
| _____ System/Component isolated with lock/tag | _____ Proper Safety Equipment on hand/located |
| _____ Personal Protection Equipment available/in use | _____ Work area clearly marked with signs & barriers |
| _____ Safe exit path known by all workers | _____ Communication with Control Room established |
| _____ Workers informed of hazard | _____ Procedure review & pre-job briefing conducted |
| _____ Affected departments notified | _____ Ample lighting provided in work area |
| _____ Planning of work sequence and emergency actions | |

The plant can support the Switchyard work permit described above. Lockout/Tagout number _____ applies.


LOM Signature _____ Date _____

Part B - Review and Concurrence (Use "N/A" in fields not required)

The following Switchyard Work Checklist completed and attached:

- Mechanical/Electrical Safety Checklist (6.2)
 Hold Out required Checklist (6.3)

WORK SUPERVISOR APPROVED: _____ Date: _____

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Part C – Reliability Coordinator Certified Operator Review and Concurrence


Work described in part A, and reviewed in Part B, may commence at _____ to be completed by _____
 (authorized duration).
 RELIABILITY COORDINATOR CERTIFIED OPERATOR APPROVED: _____
 Date: _____

Part D - Work Closeout (Use "N/A" in fields not required)

Switchyard Work described in Part A complete.
 WORK SUPERVISOR: _____ Date/Time: _____

Work area/components approved for re-energization:
 LOM or Designee: _____ Date/Time: _____
Signature

Affirm Release Position: _____ Date/Time: _____
Signature

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ATTACHMENT 6.2

MECHANICAL/ELECTRICAL SAFETY CHECKLIST

LOCATION OF WORK: _____ _____
DESCRIPTION OF WORK : _____ _____

(Use "N/A" in fields not required)

ELECTRICAL HOT WORK (Refer to procedure TBD, "General Electrical Safety")

- Electrical hazards known by workers
- Insulated tools required and available
- Safety person assigned with communication
- Rubber mat and Rubber gloves
- No loose clothing, jewelry, or metal objects on workers person

COMPONENT ISOLATIONS


- Mechanical Ground Switch surveyed
- Personal Ground Cables Inspected
- Electrical safety equipment surveyed and inspected (Hot-Sticks, Gloves, Shields, etc.)

HOLD OUT REQUIRED

- SRP PDO Notified of the activity
- Switching Order provided to SRP PDO
- Action granted by SRP PDO

REQUIRED SAFETY EQUIPMENT

List of Items	Identification Number	Installed By	Removed By	Accounted For (Y/N)

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ATTACHMENT 6.3

HOLD OUT REQUIRED CHECKLIST



LOCATION OF WORK: _____ _____
DESCRIPTION OF WORK : _____ _____

(Use "N/A" in fields not required)





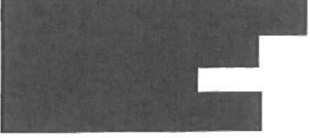





- _____ Reviewed Lockout requirements
- _____ Notified Operations & Maintenance Manager
- _____ PDO notified of the intent to isolate Contact (PDO) _____
- _____ CECD notified of the intent to isolate Contact _____
 (CECD) _____
- _____ Switching Order Provided to PDO/CECD Switching Order # _____
- _____ Switching Order obtained with copy in the control room
- _____ Access arrangements made with SRP
 - _____ SRP required onsite access or
 - _____ HGC required onsite access to Hassayamp switchyard
- _____ Lock out/Tag out Number used _____








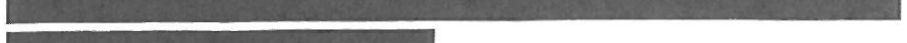


Hold Out Contact list




	NEW HARQUAHALA GENERATING OPERATIONS AND MAINTENANCE PROGRAM	
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ATTACHMENT 6.4
500 KV SWITCHING ORDER









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	NEW HARQUAHALA GENERATING OPERATIONS AND MAINTENANCE PROGRAM	[REDACTED]
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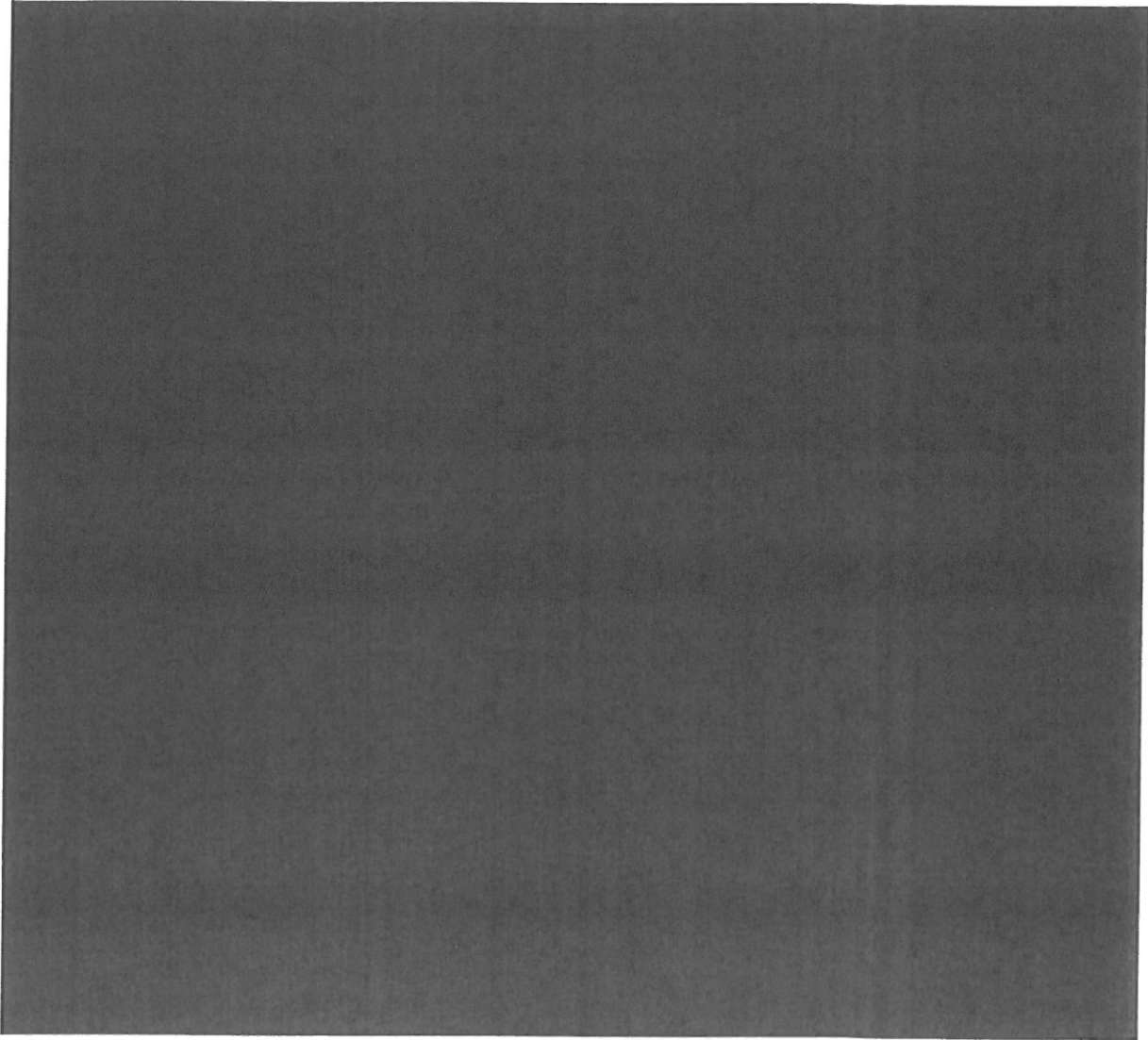
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**ATTACHMENT 6.5
SWITCHYARD DIAGRAM**



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FINAL EXECUTED AMENDMENT**

**Amendment No. 1
to New Harquahala Generating Company
Compliance With Certain TO/TOP Reliability Standards
and Related Requirements**

This Amendment No. 1 ("Amendment") to New Harquahala Generating Company Compliance With Certain TO/TOP Reliability Standards and Related Requirements, dated as of July 30, 2008, ("Methods of Compliance Agreement"), by and between New Harquahala Generating Company ("Harquahala"), the North American Electric Reliability Corporation ("NERC") and the Western Electricity Coordinating Council ("WECC"), is entered into by Harquahala, NERC and WECC as of APRIL 09, 2009.

Background

1. Harquahala, NERC and WECC are parties to the above-referenced Methods of Compliance Agreement.
2. Harquahala, NERC and WECC wish to amend certain provisions of the Methods of Compliance Agreement.

Agreement

NOW, THEREFORE, Harquahala, NERC and WECC agree as follows:

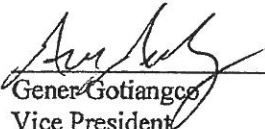
3. All terms used in this Amendment that are not otherwise defined have meanings set forth in the Methods of Compliance Agreement.
4. The entry for PER-001 and PER-003 in Attachment B to the Methods of Compliance Agreement shall be deleted and replaced in its entirety as follows:

PER-001	R1	<p>It is understood that:</p> <p>(2A) All requirements which fall under the TOP function must be performed by or under the direction of or in coordination with a NERC certified operator.</p> <p>(2B) The Harquahala personnel engaged in switching activities need not be NERC-certified operators, provided they act under the direction of or in coordination with a NERC-certified operator of Constellation Energy Control and Dispatch (CECD) or another third party service provider under a contractual agreement with Harquahala for the provision of NERC-certified operators to Harquahala.</p> <p>Given the understandings set forth above, to satisfy these Requirements, Harquahala will contract with CECD (or another service provider), and CECD (or another service provider) will train its personnel in those</p>
PER-003	R1, R1.1, R1.2	

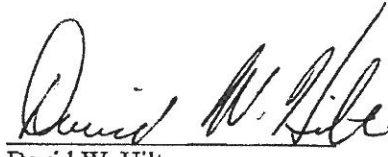
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		TO/TOP functions necessary for operations of the Harquahala transmission facilities, which Harquahala states are limited. For the avoidance of doubt, to satisfy these Requirements, so long as CECD's NERC certified operators (which are not located at the Harquahala site) are providing TOP services to Harquahala and addressing these Requirements, it will not be necessary for Harquahala to have NERC certified operators on-site at its generating facility or switchyard.
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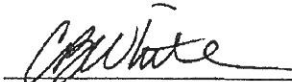
5. Appendix 1 to Attachment B of the Methods of Compliance Agreement shall be deleted.
6. As hereby amended, all of the terms, provisions and attachments of the Methods of Compliance Agreement shall continue in full force and effect. Upon execution and delivery of this Amendment, all references in the Methods of Compliance Agreement or in any other document to the Methods of Compliance Agreement shall mean the Methods of Compliance Agreement, as amended by this Amendment and any subsequent amendment mutually agreed to by the parties.
7. This Amendment may be executed in counterparts, each of which shall be deemed to be an original and all of which taken together shall constitute one and the same agreement.
8. IN WITNESS WHEREOF, the Parties have caused this Amendment to be executed and delivered by their duly authorized officers or agents, all as of the day and year first above written.



 Gener Gotiangco
 Vice President
 New Harquahala Generating Company, LLC



 David W. Hilt
 Vice President and Director of Compliance
 North American Electric Reliability
 Corporation



 Constance B. White
 Vice President, Compliance
 Western Electricity Coordinating Council