



From: Heather Miller **On Behalf Of** ComplianceHelp (SM)
Sent: Monday, August 1, 2022 10:51 AM
To: 'Richard Lauckhart' <lauckjr@hotmail.com>
Subject: RE: Two questions about NERC audits of registered entity reliability compliance...

Hi Richard,

Thank you for contacting NERC. NERC publicly posts audit reports on the NERC website as per the guidelines stipulated in the Rule of Procedures. In case of the 2019 Puget Sound Energy (PSE) compliance audit, the report is currently not eligible to be made publicly available. WECC is the compliance enforcement authority for PSE and prior to scheduling the audit, NERC was made aware of it. WECC also public post the annual audit schedule on their website.

Hope this helps. Feel free to contact us if you have any further questions.

Warm regards,

Heather

Heather Miller

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From: Richard Lauckhart <lauckjr@hotmail.com>
Sent: Wednesday, July 20, 2022 7:05 PM
To: ComplianceHelp (SM) <ComplianceHelp@nerc.net>
Subject: Two questions about NERC audits of registered entity reliability compliance...

Warning: External Email.

Dear NERC compliance help-

I have been looking for a 2019 audit report of Puget Sound Energy compliance with Reliability Criteria TPL-001.



I have gone to your website:

<https://www.nerc.com/pa/comp/Pages/NERC%20Regional%20Audit%20Reports.aspx>

I see that NERC was involved in 14 audits of WECC Registered Entities in 2019. There are no audit reports for Puget Sound Energy.

My questions are:

- 1) Is there some reason you would have performed such an audit of PSE in 2019 but would not list it in this website?
- 2) Is it possible that WECC conducted such an audit without your involvement? It is my understanding that WECC does not conduct audits of NERC reliability criteria without NERC being involved.

Thank you for your attention to these two questions.

Richard Lauckhart
Energy Consultant
El Macero, California
916-769-6704

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RE: WECC 2019 Audit of Puget Sound Energy Annual Transmission Planning Assessment compliance with FERC/NERC reliability criteria TPL-001

Albrecht, Chris <calbrecht@wecc.org>

Thu 7/21/2022 7:47 AM

To: Lauckhart, Richard <lauckjr@hotmail.com>

Cc: Israelsson, Kim <kisraelsson@wecc.org>; Oversight <oversight@wecc.org>

Hi Richard,



WECC will not be providing any more confidential information related to this matter. I understand that you have an NDA on file with WECC and have been approved for base cases in the past. Regardless, per NERC rules and WECC policy, WECC does not share detailed compliance monitoring and enforcement information with any third parties (with the exception of NERC and FERC) under any circumstances. PSE is free to share a copy of the audit report with you if they would like.

Chris

From: Richard Lauckhart <lauckjr@hotmail.com>

Sent: Thursday, July 21, 2022 6:31 AM

To: Albrecht, Chris <calbrecht@wecc.org>

Cc: Israelsson, Kim <kisraelsson@wecc.org>; Oversight <oversight@wecc.org>

Subject: Re: WECC 2019 Audit of Puget Sound Energy Annual Transmission Planning Assessment compliance with FERC/NERC reliability criteria TPL-001

EXTERNAL! Don't get hooked by a phish!

Chris-

What would help is for WECC to provide to me a copy of the audit report. I have a CEII non-disclosure agreement on file with WECC. There should be no reason WECC could not provide that audit report to me under my CEII agreement on file with WECC.

TPL-001 is a 31-page reliability requirement. It has many items. It includes the requirement that there be a stakeholder process. PSE did not conduct a stakeholder process.

Only by seeing the WECC audit report can we know:

- 1) The scope of the audit. i.e. what items in the 31-page Reliability Requirement TPL-001 were examined and what was found on those items.
- 2) What the audit said about PSE not conducting the required stakeholder process.
- 3) What the audit found was said about the need for Energize Eastside in the PSE Transmission Planning study in 2019 and whether or not WECC felt that was properly studied in 2019.
- 4) Whether the audit found anything wrong with any of the items that were examined by WECC.
- 5) Whether or not there was any involvement with NERC in this audit. TPL-001 is a NERC reliability requirement and not a WECC reliability requirement. PSE is supposed to be fully complying with this NERC reliability requirement.

I ask that WECC provide me a copy of the audit report that you now acknowledge that you actually performed.