



Regie Identification Number (NIR):	025		
Registered Entity Name:	Ville de Saguenay (Hydro-Jonquière)		
Registered Entity Acronym:	JON		
Compliance Monitoring Process:	Compliance Audit		
Distribution:	Public Version. Non-Public Information has been removed, including Restricted Information.		
Regional Entity:	Northeast Power Coordinating Council, Inc. (NPCC)		
Date of Opening Presentation:	February 15, 2022	Date of Closing Presentation:	October 20, 2022
Audit Period Start Date:	January 1, 2018	Audit Period End Date:	January 20, 2022
Date of Report:	11/15/2022	Implementation Plan Year:	2022
Potential Non-compliance to O&P standards ¹ :	None (zero)		
Jurisdiction:	Quebec, Canada		

¹ O&P stands for Operations and Planning.

Table of Contents

I. Executive Summary.....	1
II. Compliance Audit Process.....	2
Objectives	2
Scope	2
Internal Compliance Program	2
Controls	2
Confidentiality and Conflict of Interest	2
Methodology	3
Company Profile	3
III. Compliance Audit Findings.....	4
IV. Recommendations	5
Recommendations.....	5
V. Compliance Culture.....	6
Appendix 1.....	7
Compliance Audit Participants	7

I. Executive Summary

Northeast Power Coordinating Council, Inc. (NPCC) conducted an offsite Operations & Planning Compliance Audit of Ville de Saguenay (Hydro-Jonquière) (JON), NIR025 from April 20, 2022 to October 20, 2022.

At the time of the Compliance Audit, JON was registered for the functions of Distribution Provider (DP).

The Reliability Coordinator (RC), Balancing Authority (BA), and Transmission Operator (TOP) for JON is Hydro-Québec - Contrôle des mouvements d'énergie (une direction de HQT) (HQCMEÉ).

Hydro-Québec TransÉnergie (HQT) performs the functions of Planning Authority (PA), Transmission Planner (TP), and Resource Planner (RP) for the registered entities in Quebec.

The Compliance Audit team (the Team) evaluated JON for compliance with four (4) Reliability Standards and four (4) Requirements and regional Requirements in the 2022 Québec Reliability Standards Compliance Monitoring and Enforcement Program (QCMEP) Annual Implementation Plan (2022 Annual Implementation Plan). The Team assessed compliance with the requirements for the period of January 1, 2018 to January 20, 2022.

JON submitted evidence for the Team's evaluation of compliance with requirements. The Team reviewed and evaluated all evidence provided to assess compliance with selected requirements applicable to JON at the time of Compliance Audit.

Table 1: Summary of Compliance Audit Findings

Reliability Standard Requirement(s)	Not Applicable N/A	No Finding (NF)	PNC ² outcome Violation*	PNC outcome SICM**	PNC outcome Notice of No Non-Compliance
4	4	0	0	0	0

* Per the QCMEP, Violation means the identification, by the Régie de l'énergie, of a failure by a registered entity to comply with a Reliability Standard that is applicable to the registered entity.]

** SICM abbreviated term of the Simplified Identification, Correction and Monitoring Procedure following discovery of a non-compliance

The Team notified JON of no Recommendations.

There were no open Mitigation Plans for review by the Team.

The Compliance Audit Team Lead (the Team Lead) certifies that the Team adhered to all applicable requirements of the NERC Rules of Procedure (ROP), the QCMEP and the September 15, 2022 Amended and Restated Agreement on the Implementation of the Québec Reliability Standards Compliance Monitoring and Enforcement Program (the 2022 Agreement).

² PNC – Potential Non-Compliance.

II. Compliance Audit Process

The Compliance Audit process steps are detailed in the QCMEP. NPCC's application for the QCMEP generally conforms to the United States Generally Accepted Government Auditing Standards (GAGAS) 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. The Compliance Audit objectives are designed to:

- Provide reasonable assurance of compliance with applicable requirements included in the Compliance Audit scope; and
- Review JON's internal compliance program and controls.

Scope

The scope of this Compliance Audit considered the Reliability Standards in the 2022 Quebec Annual Implementation Plan, Inherent Risk Assessment (IRA), and Compliance Oversight Plan (COP) of JON completed by NPCC.

The reliability Standards and Requirements in-scope for this Compliance Audit are illustrated in Table 2: Compliance Audit Scope.

Registered Function	Standards	Requirement(s)
DP	COM-002-4	R3
DP	PRC-004-6	R5
DP	PRC-005-6	R3
DP	PRC-006-NPCC-2	R3

The Team did not expand the scope of the Compliance Audit beyond what was stated in the Appendix A of the Compliance Audit notification package.

Internal Compliance Program

Within the scope of the Compliance Audit, JON's compliance program was reviewed.

Controls

The Team reviewed JON's related internal controls associated with Requirements in scope.

Confidentiality and Conflict of Interest

Confidentiality and conflict of interest of the team are governed under the QCMEP and the 2022 Agreement. JON was informed of NPCC's obligations and responsibilities under the QCMEP and the 2022 Agreement. The work history for each Team member was provided to JON, 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. JON had not submitted any objections by the stated objection due date based on the QCMEP and accepted the Team member participants without objection. There were no denials or access limitations placed upon this Team by JON.

Methodology

The Electric Reliability Organization (ERO) Compliance Monitoring and Enforcement Manual (Manual)³ documents the ERO Enterprise's current approaches used to assess a registered entity's compliance with the NERC Reliability Standards. While the ERO Enterprise does not necessarily perform compliance monitoring activities that must be in accordance with GAGAS and other generally accepted audit practices NPCC uses these standards as framework to conduct compliance monitoring activities under the QCMEP, and recognizes that these standards provide information used in oversight, accountability, transparency, and improvements in operations.

NPCC provided JON with a Compliance Audit notification package to commence the Compliance Audit. JON provided evidence at the time requested, or as agreed upon, by NPCC. The Team reviewed the evidence submitted by JON and assessed compliance with the requirements included in the Compliance Audit scope. 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 Team Lead.

The Team reviewed documentation provided by JON and requested additional evidence and sought clarification from subject matter experts during the Compliance Audit. The evidence submitted in the form of policies, procedures, emails, logs, studies, data sheets, etc. were validated, substantiated, and cross-checked for accuracy as appropriate. Where sampling is applicable to a requirement, the sample set was determined by a statistical methodology, along with professional judgment as mentioned in the Manual.

The findings were based on the facts and documentation reviewed, the team's knowledge of the Register of entities subject to Reliability Standards (the Register), the Main Transmission System (RTP), the NERC Reliability Standards, the Quebec appendices of these standards and professional judgment. All findings were developed based upon the consensus of the Team.

Company Profile

This information has been redacted for the public distribution of the report.

³ [ERO Enterprise Compliance Monitoring and Enforcement Manual v5.0.pdf \(nerc.com\)](#).

III. Compliance Audit Findings

Based on the results of this Compliance Audit, no findings were noted for the four (4) Reliability Standards and the four (4) Requirements applicable to JON.

Based on the information and documentation provided by JON, the following four (4) Requirements were found to be not applicable.

1. **COM-002-4, R3**
2. **PRC-004-6, R5**
3. **PRC-005-6, R3**
4. **PRC-006-NPCC-2, R3**

IV. Recommendations

Recommendations

There were no Recommendations made by the Team during the engagement.

V. Compliance Culture

JON's compliance culture was not formally reviewed by the Team as part of the compliance audit. Assessment of JON's internal compliance program will be reviewed by NPCC Enforcement on an as needed basis.

Appendix 1

Compliance Audit Participants

Following is a list of all personnel from the Team and JON who were directly involved during the meetings and interviews.

Table 4: Compliance Audit Team		
Role	Title	Entity
Compliance Audit Team Lead	Senior Compliance Analyst	NPCC
Director, Compliance	Director, Compliance	NPCC
Team Member	Senior Compliance Engineer	NPCC
Team Member	Senior Compliance Engineer	NPCC
Team Member	Senior Compliance Engineer	NPCC
Observer	Economic Regulation Specialist	Régie de l'énergie
Observer	Economic Regulation Specialist	Régie de l'énergie
Observer	Economic Regulation Specialist	Régie de l'énergie

Table 5: JON Participants	
Title	Entity
Deputy Director of Operations	Hydro-Jonquière
Director, Service	Hydro-Jonquière