

Owen E. MacBride
(312) 258-5680
Email: omacbride@schiffhardin.com

Tel.: 312.258.5500
Fax: 312.258.5700

www.schiffhardin.com

April 6, 2009

VIA ELECTRONIC FILING

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

**Re: North American Electric Reliability Corporation
Docket No. RR07-16-004
Compliance Filing in Response to February 19, 2009 Order
Concerning SPP Regional Entity Use of NERC System of Accounts**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby submits a "Compliance Filing in Response to February 19, 2009 Order Concerning SPP Regional Entity Use of NERC System of Accounts" in the above-referenced docket.

This filing consists of: (1) this transmittal letter, (2) the narrative text of the filing, which follows this transmittal letter, and (3) Attachment 1 to the narrative. All of these documents are transmitted in a single pdf file.

Please contact the undersigned if you have any questions concerning this filing.

Respectfully submitted,

/s/ Owen E. MacBride
Owen E. MacBride

Attorney for North American Electric
Reliability Corporation

UNITED STATES OF AMERICA
Before the
FEDERAL ENERGY REGULATORY COMMISSION

NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION) **Docket No. RR07-16-004**
)

COMPLIANCE FILING OF THE
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
IN RESPONSE TO FEBRUARY 19, 2009 ORDER
CONCERNING SPP REGIONAL ENTITY USE
OF NERC SYSTEM OF ACCOUNTS

Rick Sergel
President and Chief Executive Officer
David N. Cook
Vice President and General Counsel
North American Electric Reliability
Corporation
116-390 Village Boulevard
Princeton, NJ 08540-5721
(609) 452-8060
(609) 452-9550 – facsimile
david.cook@nerc.net

Owen E. MacBride
Debra Ann Palmer
Schiff Hardin LLP
1666 K Street, N.W., Suite 300
Washington, DC 20036-4390
(202) 778-6400
(202) 778-6460 – facsimile
omacbride@schiffhardin.com
dpalmer@schiffhardin.com

Rebecca J. Michael
Assistant General Counsel
North American Electric Reliability
Corporation
1120 G Street, N.W., Suite 990
Washington, D.C. 20005-3801
(202) 393-3998
(202) 393-3955 – facsimile
rebecca.michael@nerc.net

April 6, 2009

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	NOTICES AND COMMUNICATIONS	2
III.	RESPONSE TO FEBRUARY 19 ORDER	2
IV.	CONCLUSION	8

Attachment 1: SPP Regional Entity Letter and Exhibit Showing Mapping of SPP RE GAAP-Based Accounts to NERC Accounts

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NORTH AMERICAN ELECTRIC)	
RELIABILITY CORPORATION)	Docket No. RR07-16-004
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IN RESPONSE TO FEBRUARY 19, 2009 ORDER
CONCERNING SPP REGIONAL ENTITY USE OF NERC SYSTEM OF ACCOUNTS

I. INTRODUCTION

The North American Electric Reliability Corporation (“NERC”) respectfully submits this filing in compliance with the Commission’s Order issued February 19, 2009 in this docket.¹ In the February 19 Order, the Commission conditionally accepted a compliance filing previously submitted by NERC, but also directed that within 30 days, Southwest Power Pool Regional Entity (“SPP RE”) develop and implement accounting procedures to enable it to reconcile its accounts and income, revenue and expenses with the NERC System of Accounts in accordance with Section 8(e) of the delegation agreement between NERC and SPP RE. The Commission directed NERC to submit a compliance filing within 45 days of the February 19 Order, certifying that SPP RE is in compliance with Section 8(e) of the delegation agreement. In this compliance filing, NERC provides information to show that SPP RE has implemented procedures to enable it to reconcile its accounts and its income, revenue and expenses with the NERC System of Accounts; and certifies that SPP RE is in compliance with Section 8(e) of the delegation agreement.

¹ *North American Electric Reliability Corporation, Order Conditionally Accepting Compliance Filing*, 126 FERC ¶ 61,123 (2009) (“February 19 Order”).

II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to:

Rick Sergel
President and Chief Executive Officer
David N. Cook*
Vice President and General Counsel
North American Electric Reliability
Corporation
116-390 Village Boulevard
Princeton, NJ 08540-5721
(609) 452-8060
(609) 452-9550 – facsimile
david.cook@nerc.net

*Persons to be included on the
Commission’s official service list.

Owen E. MacBride*
Debra Ann Palmer
Schiff Hardin LLP
1666 K Street, N.W., Suite 300
Washington, DC 20036-4390
(202) 778-6400
(202) 778-6460 – facsimile
omacbride@schiffhardin.com
dpalmer@schiffhardin.com

Rebecca J. Michael, Assistant General Counsel
North American Electric Reliability Corporation
1120 G Street, N.W., Suite 990
Washington, D.C. 2005-3801
(202) 393-3998
(202) 393-3995 – facsimile
Rebecca.michael@nerc.net

III. RESPONSE TO FEBRUARY 19 ORDER

In PP 6-9 of the February 19 Order, the Commission noted that “section 8(e) of the *pro forma* Delegation Agreement requires Regional Entities to follow NERC’s prescribed system of accounts,”² and expressed concern that SPP RE was not operating in compliance with Section 8(e):

7. NERC and SPP Regional Entity indicate that SPP Regional Entity has not performed a reconciliation of its accounts and its income, revenues and expenses for 2007 with the NERC System of Accounts. SPP Regional Entity states that pursuant to section 8(h) of the NERC-SPP Regional Entity Delegation Agreement, SPP Regional Entity is required by NERC to report quarterly unaudited financial information to NERC on the NERC Statement of Activities (formerly called the Treasurer’s Report), using the format provided on the NERC form. SPP Regional Entity states that although it does not record its income, revenue and expenses using the NERC System of Accounts, SPP Regional Entity is able, as the result of its time and expense tracking and allocation procedures, which provide for the direct charging or allocation of expenses to statutory

² February 19 Order at P 6.

programs or non-statutory activities, to identify the income and expense items and amounts that are to be reported on the NERC Statement of Activities.

8. The Commission is concerned that SPP Regional Entity has not reconciled its accounts and income, revenue and expenses with the NERC System of Accounts, in violation with its delegation agreement. Section 8(e) of the NERC-SPP Regional Entity delegation agreement requires SPP Regional Entity to follow the NERC System of Accounts.⁷ The requirements of section 8(h) of the delegation agreement do not change this.

⁷ See *North American Electric Reliability Council, et al.*, 119 FERC ¶ 61,060, at P 375 (2007) (accepting the NERC-SPP Delegation Agreement).

9. Statutory and non-statutory activities must be properly accounted for and segregated to ensure that funds are appropriately collected under section 215 to the Federal Power Act.⁸ As the Commission explained in its order accepting revisions to the Regional Entities' delegation agreements, the uniformity provided by NERC's system of accounts and related accounting instructions permits comparability and analysis of data provided by NERC and the Regional Entities in their budget filings, among other things.⁹ The Commission concluded that this uniformity is essential for identifying costs of statutory and non-statutory activities, comparing each fiscal year budget with actual results, making comparisons among the Regional Entities and ensuring that funds approved for statutory activities are adequately controlled.¹⁰ Accordingly, the Commission directs SPP Regional Entity to develop and implement accounting procedures to comply with section 8(e) of the NERC-SPP Regional Entity delegation agreement within 30 days of date of this order. NERC shall make a compliance filing within 45 days of the date of this order certifying that SPP Regional Entity is in compliance with this section of the delegation agreement.

⁸ 16 U.S. C. § 824o (2006).

⁹ *North American Electric Reliability Council, et al.*, 122 FERC ¶ 61,245, at P 29 (2008).

¹⁰ *Id.*

As correctly stated in P 7 of the February 19 Order, SPP RE does not – at least in the first instance – record its income, revenues and expenses directly to the NERC System of Accounts. Rather, SPP RE initially records income, revenue and expenses to its GAAP-based accounting system.³ Southwest Power Pool, Inc. (“SPP”) has developed and uses a GAAP-based general

³ GAAP = Generally Accepted Accounting Principles.

ledger system that enables it to satisfy the accounting and financial reporting requirements of GAAP and SPP's jurisdictional reporting requirements pursuant to the Commission's Uniform System of Accounts. However, for NERC reporting purposes, SPP RE has developed a mapping procedure to enable it to reconcile income, revenues and expenses initially recorded in the SPP GAAP-based general ledger system to the accounts prescribed by the NERC System of Accounts.

Attachment 1 to this filing is a letter from SPP RE providing, in Exhibit A to the letter, the mapping used by SPP RE from the SPP GAAP-based account numbers to the appropriate NERC account numbers. NERC Finance and Accounting staff have reviewed SPP RE's mapping of SPP accounts to NERC accounts, and determined that this mapping provides for income and expenses initially recorded in the GAAP-based accounts to be subsequently reconciled to the NERC account numbers that are appropriate for the particular items of income and expense.⁴ While Exhibit A shows the mapping between the account numbers in the SPP GAAP-based general ledger system and the NERC account numbers at the aggregate Regional Entity level for each NERC income and expense account, SPP RE also records income and expenses in each account by NERC program area, to the extent income is received and/or expenses are incurred by SPP RE in particular accounts of the NERC System of Accounts.⁵

⁴ To be clear, as a result of ongoing review of annual business plans and budgets, quarterly reports (NERC Statement of Activities), and annual unaudited and audited financial reports submitted by SPP RE, NERC Finance & Accounting staff were well aware of the mapping used by SPP RE long before the preparation of this filing.

⁵ The functional categories in the NERC System of Accounts are: 0300 – Reliability Standard Development; 0400 – Compliance Enforcement; 0500 – Organization Registration and Certification; 0600 – Personnel Certification; 0700 – Reliability Readiness and Improvement; 0800 – Reliability Assessment and Performance Analysis; 0900 – Training and Education; 1000 – Situational Awareness and Infrastructure Security; 1100 – Members Forums; 2000 – General and Administrative; 2100 – Executive; 2200 – Legal and Regulatory; 2300 – Information Technology; 2400 – Human Resources; 2500 – Accounting and Finance. The current version of

Under SPP RE's internal time- and cost-reporting procedures, direct costs are recorded to the individual statutory direct programs, and indirect (overhead) costs are allocated to the individual statutory direct programs. These procedures were described in detail in NERC's April 1, 2009 filing of actual cost-to-budget reconciliations for the year ended December 31, 2008.⁶

Through the mapping detailed in Exhibit A to **Attachment 1**, SPP RE reconciles its accounts with the NERC System of Accounts. This mapping procedure enables SPP RE to submit required budget and actual financial information to NERC in accordance with the NERC System of Accounts. SPP RE submits its proposed annual budget to NERC in a NERC-specified format and using NERC-supplied templates, which are structured on the basis of the NERC System of Accounts. The Regional Entity budgeted income and expenses are required to be submitted, and are presented in the budgets filed with the Commission, disaggregated by statutory direct program area. SPP RE also submits reports of year-to-date income and expenses to NERC on a quarterly basis using the template specified by NERC (the NERC Statement of Activities).⁷ Finally, SPP RE provides to NERC an annual reconciliation of SPP RE's actual

the NERC System of Accounts was filed with the Commission as Attachment 1 to the *Additional Compliance Filings of the North American Electric Reliability Corporation in Response to October 18, 2007 Order*, filed April 1, 2008 in Docket No. RR07-16-003 ("April 1, 2008 Compliance Filing").

⁶ See Attachment 7 to *Additional Compliance Filing of the North American Electric Reliability Corporation in Response to October 18, 2007 Order – Comparisons of Budgeted to Actual Costs for 2008 for NERC and the Regional Entities*, filed April 1, 2009 in Docket RR07-16-005 ("April 1, 2009 Compliance Filing"). See also §5 of Exhibit E to the NERC-SPP RE Delegation Agreement as filed in Attachment 9 to NERC's July 21, 2008 Compliance Filing in Docket Nos. RR06-1-016 *et al.* *Compliance Filing of the North American Electric Reliability Corporation in Response to March 21, 2008 Order*, filed July 21, 2008 ("July 21, 2008 Compliance Filing").

⁷ The quarterly NERC Statement of Activities requires the Regional Entity to report year-to-date totals for specified line item components of income and expenses at the overall Regional Entity level, and does not require further disaggregation of the reported income and expenses by statutory direct program area.

income and expenses for the year to its budgeted income and expenses, for use in submitting the annual actual cost-to-budget reconciliations required by the Commission. SPP RE's annual reconciliation of its actual income and expenses to its budgeted income and expenses is also provided in a NERC-specified format and using NERC-supplied templates, which are structured on the basis of the NERC System of Accounts, and (in accordance with the NERC-specified format and templates) are disaggregated by statutory program area.⁸ Through these submittals, SPP RE reconciles its budgeted and actual income, revenue and expenses using the NERC System of Accounts.

The procedure followed by SPP RE, in which it initially records costs in a general ledger system that is based on a system of accounts other than the NERC System of Accounts, and then uses a mapping procedure to translate costs as recorded in its general ledger system to accounts in the NERC System of Accounts for NERC reporting purposes, is not unique among the Regional Entities. To the contrary, at least three other Regional Entities use a similar procedure. These procedures were described in §III.A of the April 1, 2008 Compliance Filing and related attachments.⁹

Section 8(e) of the delegation agreement between NERC and SPP RE states:

(e) SPP shall submit its annual budget for carrying out its Delegated Authority functions and related activities listed on **Exhibit E**, as well as all other SPP activities and funding to NERC no later than June 1 of the prior fiscal year such that NERC may submit its budget to the Commission 130 days in advance of the beginning of each fiscal year. The SPP budget submission shall include supporting materials, including SPP's complete business plan and organization chart, explaining the proposed collection of all dues, fees and charges, and the proposed expenditure of funds collected in sufficient detail to justify the requested funding collection and budget expenditures. NERC shall develop, in consultation

⁸ SPP RE's actual cost-to-budget reconciliation for the year ended December 31, 2008, was included as Attachment 7 to the NERC's April 1, 2009 Compliance Filing.

⁹ See April 1, 2008 Compliance Filing at pages 4-9 and Attachments 5, 10 and 11.

with the Regional Entities, a reasonable and consistent system of accounts, with a level of detail and record keeping comparable to the Commission's Uniform System of Accounts and sufficient to allow the Commission to compare each Commission-approved NERC fiscal year budget with the actual results at the NERC and Regional Entity level. SPP shall follow NERC's prescribed system of accounts except to the extent that NERC permits a departure from the prescribed system of accounts. NERC shall make an informational filing with the Commission describing any such waiver it permits and providing an explanation supporting the permitted departure.¹⁰

Although P 9 of the February 19 Order directs NERC to certify "that SPP Regional Entity is in compliance with this section of the delegation agreement," in the context of the discussion in PP 6-9 of the February 19 Order, the Commission is requesting NERC to certify that SPP RE is in compliance with the following provision of Section 8(e): "NERC shall develop, in consultation with the Regional Entities, a reasonable and consistent system of accounts, with a level of detail and record keeping comparable to the Commission's Uniform System of Accounts and sufficient to allow the Commission to compare each Commission-approved NERC fiscal year budget with the actual results at the NERC and Regional Entity level. SPP shall follow NERC's prescribed system of accounts except to the extent that NERC permits a departure from the prescribed system of accounts." Based on the information provided in **Attachment 1** and on NERC's review of and familiarity with the annual budgets, quarterly financial reports, annual reconciliations of actual income and expenses to budgets, and unaudited and audited annual financial statements submitted by SPP RE (as described above), NERC so certifies.

¹⁰ Section 8(e) of the NERC-SPP RE Delegation Agreement, as filed in Attachment 9 to the July 21, 2008 Compliance Filing and accepted in the Commission's Order issued December 19, 2008, and made effective January 3, 2009 as specified in that Order. *North American Electric Reliability Council, et al., Order Accepting Compliance Filings, Subject to Conditions*, 125 FERC ¶ 61,330 (2008), at P 14 and Ordering Paragraph (A).

IV. CONCLUSION

The North American Electric Reliability Corporation respectfully requests that the Commission accept this filing as compliance with the February 19 Order.

Respectfully submitted,

/s/ David N. Cook
Rick Sergel
President and Chief Executive Officer
David N. Cook
Vice President and General Counsel
North American Electric Reliability
Corporation
116-390 Village Boulevard
Princeton, NJ 08540-5721
(609) 452-8060
(609) 452-9550 – facsimile
david.cook@nerc.net

/s/ Owen E. MacBride
Owen E. MacBride
Debra Ann Palmer
Schiff Hardin LLP
1666 K Street, N.W., Suite 300
Washington, DC 20036-4390
(202) 778-6400
(202) 778-6460 – facsimile
omacbride@schiffhardin.com
dpalmer@schiffhardin.com
Rebecca J. Michael, Assistant General Counsel
North American Electric Reliability Corporation
1120 G Street, N.W., Suite 990
Washington, D.C. 2005-3801
(202) 393-3998
(202) 393-3995 – facsimile
Rebecca.michael@nerc.net

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Chicago, Illinois this 6th day of April, 2009.

/s/ Owen E. MacBride
Owen E. MacBride

*Attorney for North American Electric
Reliability Corporation*

ATTACHMENT 1

**SPP REGIONAL ENTITY LETTER AND EXHIBIT
SHOWING MAPPING OF SPP RE GAAP-BASED ACCOUNTS
TO NERC ACCOUNTS**



SOUTHWEST POWER POOL

415 NORTH MCKINLEY, SUITE 140 LITTLE ROCK, ARKANSAS 72205

March 20, 2009

North American Electric Reliability Corporation
Princeton Forrestal Village
116-390 Village Boulevard
Princeton, New Jersey 08540-5721

Subject: Southwest Power Pool Response (SPP) to Federal Energy Regulatory
Commission (FERC) Docket No. RR07-16-004

Dear Bruce,

As per our recent conversations, below is SPP's response to the February 19, 2009 Order in FERC docket number RR07-16-004. In the order, FERC states it "is concerned that SPP Regional Entity has not reconciled its accounts and income, revenue and expenses with the NERC System of Accounts, in violation with its delegation agreement. Section 8(e) of the NERC-SPP Regional Entity delegation agreement requires SPP Regional Entity to follow the NERC System of Accounts (P 3-4)." FERC also orders SPP to "develop and implement accounting procedures to comply with section 8(e) of the NERC-SPP Regional Entity delegation agreement within 30 days of the date of this order, as discussed in the body of this order (P 4)."

As we have discussed, SPP is currently and has been reconciling its accounts and income, revenue and expenses with the NERC System of Accounts. This is done on a monthly, quarterly, and annual basis in preparation of both internal and external reporting requirements. The attached document, Exhibit – A, specifically provides the account mapping SPP uses to reconcile financials associated with support of its delegated functions to the NERC System of Accounts. This is similar in nature to the financial practices of several other regional entities. As well, SPP continues to refine its procedures to ensure compliance with the delegation agreement and provide additional consistency with NERC and the other regional entities.

If you have any questions related to the submitted materials please feel free to call me at the number below or email me at ssmith@spp.org. Thank you for your help.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Smith", written over a horizontal line.

Scott Smith
Accounting Manager
Southwest Power Pool
501-614-3339

EXHIBIT - A

SOUTHWEST POWER POOL
GAAP* BASED ACCOUNT NUMBERS
MAPPED TO NERC SYSTEM OF ACCOUNTS

SPP ACCOUNT NUMBER	SPP ACCOUNT DESCRIPTION		NERC ACCOUNT NUMBER	NERC ACCOUNT DESCRIPTION
45310	NERC ERO Regional Entity Revenue	→	41000	Assessments
49200	Conference/training fees	→	45200	Continuing Education Hours (CEH) Fees
49999	Other Income	→	49900	Miscellaneous Income
	Total Revenues			
61100	Salaries	→	51000	Direct Salaries
61199	Deferred salaries expense	→	55300	Deferred Compensation Exp
61200	Performance Compensation	→	51000	Direct Salaries
61210	Benefits, Health	→	54100	Benefits — Medical
61215	Benefits, dental	→	54100	Benefits — Medical
61225	Benefits, insurance, life (employer paid)	→	54200	Benefits — Life
61230	Benefits, 401k savings plan (employer portion)	→	55100	Employee Savings Plan
61235	Benefits, continuing education	→	54000	Benefits-Education Reimbursement
61280	Benefits, pension funding	→	55200	Pension and Savings Admin
61285	Benefits, retiree health care funding	→	55200	Pension and Savings Admin
61310	Social Security	→	52000	Payroll Taxes — FICA
61320	Medicare	→	52100	Payroll Taxes — Medicare
61330	Federal Unemployment Insurance	→	52300	Payroll Taxes — FUI
61341	State Unemployment Insurance, Arkansas	→	52200	Payroll Taxes — SUI
61342	State Unemployment Insurance, Texas	→	52200	Payroll Taxes — SUI
61343	State Unemployment Insurance, Missouri	→	52200	Payroll Taxes — SUI
61345	State Unemployment Insurance, Oklahoma	→	52200	Payroll Taxes — SUI
61520	Relocation expenses	→	54600	Benefits — Relocation
	Total Salaries, Taxes & Benefits			
62100	Airfare	→	62000	Travel
62200	Mileage	→	62100	Auto Expense
62300	Lodging	→	62000	Travel
62400	Ground transportation, parking, tolls	→	62000	Travel
62500	Meals	→	62000	Travel
62999	Miscellaneous travel	→	62000	Travel
	Total Travel Expense			
63020	Bank charges	→	72200	Bank Charges
63060	Dues	→	71500	Dues
63080	Freight	→	71600	Postage
63090	Help wanted advertising	→	72500	Presentation and Publicity
63101	Insurance, credit	→	75500	Insurance — Commercial
63102	Insurance, D&O liability	→	75500	Insurance — Commercial
63103	Insurance, EDP	→	75500	Insurance — Commercial
63104	Insurance, excess liability	→	75500	Insurance — Commercial
63105	Insurance, general liability	→	75500	Insurance — Commercial
63106	Insurance, workers compensation	→	75500	Insurance — Commercial
63160	Office expense	→	71200	Office Supplies
63180	Postage	→	71600	Postage
63200	Publications and subscriptions	→	71400	Subscriptions and Publications
63210	Equipment	→	71300	Computer Supplies and Maintenance
63220	Utilities	→	70010	Utilities
63920	Use tax	→	72300	Sales and Use Tax
	Total Administrative Expense			
65000	External meetings expense	→	61000	Meeting Expense

EXHIBIT - A

SOUTHWEST POWER POOL
GAAP* BASED ACCOUNT NUMBERS
MAPPED TO NERC SYSTEM OF ACCOUNTS

SPP ACCOUNT NUMBER	SPP ACCOUNT DESCRIPTION		NERC ACCOUNT NUMBER	NERC ACCOUNT DESCRIPTION
65100	Department meetings/meals	→	61000	Meeting Expense
	Total Meetings Expense			
66110	Circuits, analog	→	65200	Contract — IDC
66140	Circuits, OC-48	→	65200	Contract — IDC
66210	Conferencing, audio	→	63000	Conference Calls
66350	Frame relay, third parties	→	65300	Contract — Frame Relay
66440	Internet, employee access	→	71100	Internet Expense
66450	Internet, primary	→	71100	Internet Expense
66460	Internet, secondary	→	71100	Internet Expense
66530	O&M, cellular phone services	→	71000	Telephone
66540	O&M, long distance 800	→	71000	Telephone
66560	O&M, long distance out	→	71000	Telephone
66570	O&M, satellite phone service	→	71000	Telephone
	Total Communications Expense			
67200	Maintenance, computer hardware & software	→	71300	Computer Supplies and Maintenance
67500	Maintenance, miscellaneous	→	70020	Maintenance
	Total Maintenance Expense			
67912	Leases, office space, rents	→	70000	Office Rent
67940	Leases, office equipment	→	71300	Computer Supplies and Maintenance
	Total Leases and Rents			
68300	Outside services, accounting & auditing	→	75300	Accounting and Auditing Fees
68500	Legal	→	75400	Legal Fees — Other
68600	Outside services, other professional	→	65000	Consultants
68700	Consulting	→	65000	Consultants
68910	RE Trustee Compensation	→	75000	Board of Trustees Fee
	Total Outside Services			
69000	Depreciation expense, general plant	→	95100	Depreciation Expense — Equipment
72900	Interest expense, other	→	80100	Interest Expense
78800	Other expense	→	99000	Miscellaneous Expense
82000	Interest income	→	49000	Interest Income
88001	Other income	→	99000	Miscellaneous Expense
	Total Other Income & Expense			

NOTES:

* GAAP - Generally Accepted Accounting Principles

New accounts are added as needed and mapped to the appropriate NERC account

SPP commissions an annual external audit of financials for compliance with GAAP