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## Industry News & Updates

9/4/13  
**JANE WATKINS JOINS COMPLIANCE TEAM**  
 MPC welcomes 27-year Arizona Public Service Company (APS) veteran Jane Watkins

[read more](#)

9/4/13  
**WHAT DOES A COMPLIANCE AUDIT AND THE GOLDEN GATE BRIDGE HAVE IN COMMON?**  
 They both are never ending projects that can make you see red.

[read more](#)

9/4/13  
**HOW LUCKY CAN ONE HAWAIIAN ISLAND GIRL BE?**  
 MPC can help you prepare for an audit and avoid a stressful audit situation...

[read more](#)

McCoy Power Consultants Inc. is a member of the following organizations:





## COMPANY OVERVIEW

McCoy Power Consultants Inc. (MPC) was formed in 2009 in response to a need from NERC Registered Entities for assistance with their compliance efforts. MPC is a consulting firm that has firsthand knowledge of the NERC and Regional compliance monitoring processes and methods. We provide expertise with NERC Reliability Standards, the Regional Reliability Standards and the Compliance Monitoring and Enforcement Programs used by NERC and the Regions. Steve McCoy, CEO and Principal Consultant was previously Vice President and Director of Compliance at WECC and Bob Kiser, also a Principal Consultant for MPC was Manager of Audits and Investigations for WECC and both were principals in the development of the NERC and WECC compliance programs.

MPC has a wide knowledge base that spans all standards including Balancing, Communications, Emergency Operations, Transmission Operations, Personnel, Modeling and Planning. MPC provides consulting services to Registered Entities and strives to provide the highest quality products and services to their clients. MPC also provides a Compliance Monitoring and Reporting Program to assist Registered Entities in their routine compliance activities.

### STEVE MCCOY *Chief Executive Officer / Principal Consultant*

Steve is the CEO and Principal Consultant for MPC. Steve specializes in all aspects of compliance with NERC and Regional Reliability Standards. He has a unique understanding of the development, organization and presentation of evidence necessary for a Registered Entity to show compliance with the reliability standards and the auditing methods used by auditors and investigators. Steve also specializes in preparing a Registered Entity for settlement conferences and hearings associated with an alleged violation(s) of a reliability standard. Steve McCoy was the Vice President and Director of Compliance for the Western Electricity Coordinating Council (WECC), until the end of 2008. At that time Steve left WECC to start MPC.

Steve has over thirty years of experience in the power industry. Steve's power system operation experience was with Southern California Edison and the California ISO. Steve left the CAISO to start-up the reliability standards compliance program for the Florida Reliability Coordinating Council (FRCC). In 2006, Steve was engaged by WECC to implement the same compliance program and department start-up for WECC. He was instrumental in the drafting of the registration criteria, developing the concept of the first set Reliability Standards Audit Worksheets, and developed the initial internal compliance program evaluation criteria. Steve has lead or participated in over forty compliance audits and investigations in the FRCC and WECC regions.

Steve conducts gap analysis for Registered Entries and has a unique understanding of the internal workings of the NERC and regional compliance programs, the regional audit and investigation methods and processing of alleged violations, including being the WECC lead on all settlement negotiations until the end of 2008. There is no other consultant in the industry that has the knowledge and experience Steve has to help an entity with registration issues, evidence preparation and review, audit and investigation preparation and settlement negotiations.

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**BOB KISER** *Principal Consultant*

Bob brings to MPC over 36 years of experience in electric utility transmission system operations and maintenance. Before working for MPC, Bob held the Manager of Compliance, Audits and Investigations position with the Western Electricity Coordinating Council (WECC), where he was responsible for the planning and implementation of WECC's Compliance Monitoring and Enforcement Program (CMEP), including Self-Certification, Self-Reporting, Spot Checks, On-Site and Off-Site Compliance Audits, Compliance Violation Investigations and Exception Reporting.

Prior to WECC, Bob worked for the USDOE, Bonneville Power Administration (BPA), where he served as BPA's Transmission Services Regional Manager for Western Oregon. As Regional Manager with BPA, Bob provided management and oversight of all aspects of BPA transmission system operations and maintenance in Western Oregon, including transmission line maintenance, vegetation management, substation maintenance, substation operations, transmission system protections and control, communications, and security. Additionally, while at BPA, Bob was a USDOE Certified Accident Investigator and a Certified Accident Investigation Board Chairman.

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**DAWN MCCOY** *Chief Financial Officer / Administration*

Dawn is the CFO of McCoy Power Consultants Inc. She manages the financial and administrative functions of MPC and oversees the day-to-day operations of the company, including budget management, all accounting functions, client contract management and travel schedules and arrangements. Dawn also manages MPC's marketing plan and develops company marketing materials and maintains the company website. Dawn is also responsible for editing company documents including client proposals, program documents, operating procedures and gap analysis reports.

Dawn has over 20 years of experience in corporate marketing as Project Manager, Publications Editor and Graphic Designer for such Northern California companies as the California Chiropractic Association (CCA), Vision Service Plan (VSP) and SureWest Communications. Dawn has a BA degree in Journalism from California State University, Sacramento.

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**KIMBERLY TAKAYESU** *Compliance Consultant / Client Representative*

Kim manages corporate projects and MPC's Internal Compliance Programs and is available to support MPC's clients' compliance needs. Kim also develops the monthly Industry News Updates, compliance reports, monitors compliance web-portals, conducts periodic reviews of compliance evidence, tracks compliance issues, prepares audit, spot check and periodic data submittals, monitors and implements GADs and DADs reporting, monitors and implements NERC Alert responses and any other compliance related issues.

Kim brings to MPC extensive experience with the NERC Reliability Standards and has assisted with developing procedures, organization and maintenance of compliance evidence, along with managing all aspects of the Regulatory and Registration processes for more than 25 wind farms with projects covered by four Regional Reliability Organizations (WECC, SPP, TRE, and RFC) and three Independent System Operators/Regional Transmission Organizations (ERCOT, CAISO and PJM).

Kim has worked in the Energy Sector as a Regulatory Affairs Specialist since 2005, with the main emphasis on wind generation, wind farm development, construction and operations.

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**JANE WATKINS** *Compliance Consultant / Client Representative*

Jane manages corporate projects and MPC's Internal Compliance Programs, and is available to support MPC's clients' compliance needs. Jane interfaces with the clients and provides the following services and functions for the client: Develops monthly compliance reports, monitors compliance web-portals, conducts periodic reviews of compliance evidence, tracks compliance issues, prepares audit, spot check and periodic data submittals, monitors and implements GADs and DADs reporting, monitors and implements NERC Alert responses and any other compliance related issues.

Previously, Jane worked for Arizona Public Service Company (APS), for 27 years. Starting in 2007, Jane worked exclusively on NERC Reliability Standards and WECC Regional Standards. During this time, Jane participated in the standards development process, audit preparation, annual certification of compliance, document preparation, as well as monthly, quarterly and annual reporting. In addition, Jane has experience working with the Federal Energy Regulatory Commission (FERC).

Jane has a Bachelor of Science in Business Administration from Arizona State University.



## NERC COMPLIANCE

McCoy Power Consultants Inc. (MPC) can help you with any issues or problems associated with your compliance program.

### GAP ANALYSIS / EVIDENCE REVIEW

MPC conducts gap analysis / evidence reviews for all types of Registered and Non-Registered Entities. MPC Principal Consultants have a thorough understanding of the NERC Reliability Standards and the typical evidence that the auditor is reviews for specific standards and requirements. MPC understands the concept of "evidence stacking," which is now be required and reviewed during audits and can help an Entity implement this process.

MPC has develop a unique set of questionnaires, data requests and compliance evidence evaluation tools that will be used to evaluate a Registered Entities compliance with each standard and requirement. At the completion of a gap analysis / evidence review we will provides a full report on the review, including a compliance analysis, list of action item items required to close compliance gaps and a list of other suggested improvements that will further strengthen and reinforce a Registered Entities compliance posture.

The gap analysis / evidence review can be completed as part of a mock audit (as discussed in the next section), or as just an evidence review. MPC also has implemented FTP uploads to the MPC corporate servers which can allow for a gap analysis / compliance review on some standards to be completed without an on-site visit.

### MOCK AUDITS AND AUDIT PREPARATION

While conducting a gap analysis or compliance review, MPC can conduct the review in a mock audit format. Using this method, MPC sends an audit notice, questionnaire and data request similar to what the Regions do. MPC then submits additional data requests along with requests for interviews in a formal format as would an audit team. MPC will then except the responses to the requests in the same time frames as the Region would require. When using this format, MPC will use the "step out of the mock audit" mode when necessary to make sure the Entity processes the requests so that MPC can complete a full gap analysis / compliance evaluation during the mock audit.

MPC has also developed training materials that address the audit process and the interfacing with the audit team. Most entities have found that having all of the Subject Matter Experts (SMEs), attend this training before an audit can be very valuable and have a large influence on the outcome of an audit. Remember, while many of your SMEs may be experts on their technical subjects, many are not experts on audit interviews and explaining evidence to an auditor.

Since the principal consultants at MPC been the "auditors" and have reviewed the evidence of many Registered Entities, they can bring a unique perspective to the training of your SMEs.

## REGISTRATION ISSUES

Registration of Registered Entities determines responsibility for compliance with NERC Reliability Standards. MPC can help you understand the NERC registration requirements and determine if your facilities or functions require registration. Proper registration is essential to avoid costly penalties should a Compliance Enforcement Authority (CEA), disagree with your company's internal registration determination. Once a CEA has determined that a Registered Entity should be registered for additional functions, there is usually only a small, or in some cases, no implementation period for the newly identified registration functions. The CEA could immediately require the submittal of Self-Certification forms for the newly registered functions. The inability to show immediate compliance with the newly required functions could result in large monetary penalties.

MPC is also an expert in the registration appeals process. To date most registration appeals have ruled in favor of the CEA.

MPC can provide an Entity insight on the registration appeal process and guidance on how to prepare an appeal, along with the technical justification necessary to support a registration appeal. MPC is also an expert on the registration by requirement process, and can help entities negotiate with the Regions to reduce the applicable requirements for some registrations.

## SETTLEMENT AND HEARING PREPARATION

Almost 100 percent of contested compliance violations have been resolved during a settlement conference. Success at a settlement conference usually can be measured by reducing a proposed penalty by 50 percent or greater. In some cases, discussion during a settlement conference can result in penalties being reduced to zero and at times, having some or all violations dismissed.

You do not want to sit down across the table from the Compliance Enforcement Authority (CEA) enforcement group at a settlement conference until you have had a strategy session with MPC. Steve McCoy has first-hand experience at numerous settlement conferences and can guide you through the entire settlement process.

MPC provides our clients with general strategy information, specific strategies for each alleged violation, preparation of technical supporting documentation and participation at the table with you when you meet with the CEA.

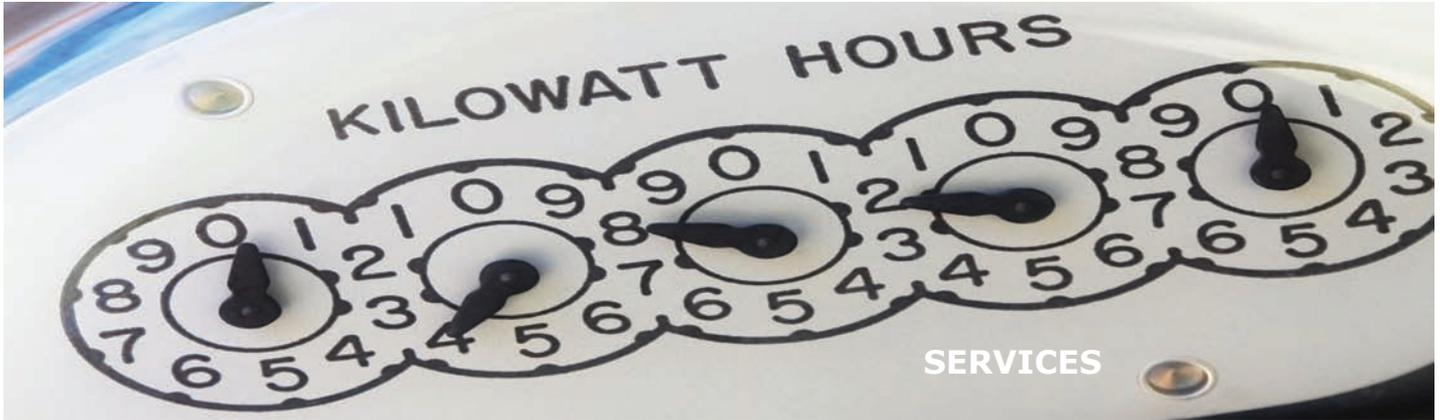
Call MPC before you meet with any CEA in a settlement conference. If you are unable to resolve a compliance or registration issue during a settlement conference, MPC can help you prepare for a regional hearing and NERC and FERC appeals. MPC has considerable experience in the regional and NERC and FERC hearing and appeal processes regarding registration disputes.

## INVESTIGATION PREPARATION

The Compliance Enforcement Authority (CEA) can initiate a Compliance Violation Investigation (CVI) anytime they believe a possible violation of a reliability standard has occurred. Any grid event that occurs on your system will most likely result in a CVI. The CVI can be initiated by the regional CEA or NERC. NERC is currently staffing a large group of Compliance Investigators to conduct CVI's. FERC is also investigating many grid events.

MPC can help your company prepare for a CVI by:

- Evaluating the CVI notice and determining the nature and scope of the CVI
- Preparing technical data response to CVI data requests
- Facilitating the CVI process
- Providing direct support during CVI interviews



## COMPLIANCE MANAGEMENT

McCoy Power Consultants (MPC) can assist an entity with the development and evaluation of an internal compliance program; including, the setup of your electronic compliance folder and file structure for the organization of compliance programs documents and evidence.

MPC also offers a monthly compliance monitoring and reporting program (CMRP) that will completely implement a Registered Entity's compliance program. MPC provides a reliability standard service that monitors changes to future reliability standards and advises Registered Entities on program and procedure changes that are necessary to implement future standards.

## COMPLIANCE PROGRAM DEVELOPMENT AND TRAINING

MPC can fully develop a Registered Entities internal compliance program. We have templates that can develop a full program, including compliance program documents and standard specific compliance templates.

Our *Master Compliance Program Templates* can be easily adapted to an entities specific program design and organization. Our templates include all of the elements that are required by the regional Compliance Program Audit Worksheets (CPAWs). When developing the program for an entity, MPC specifically attempts to implement program requirements that align with the Registered Entities current business practices.

The Compliance Evidence Methodology (CEM) documents are the heart of a Registered Entities internal compliance program. MPC develops one CEM document for each Reliability Standard.

MPC will also develop, using MPC templates, an internal compliance training program to all involved personnel, as part of your internal compliance program, and will develop and deliver Reliability Standard specific training to all involved SMEs. MPC can tailor this training to the specific size and needs of your company.

## DOCUMENT AND FILE MANAGEMENT

Organization of compliance evidence files is the most critical step any Registered Entity can implement to ensure compliance with the Reliability Standards. MPC has developed a detailed compliance program file structure template that can be customized and implemented for any Registered Entity.

Our file structure includes organization for the filing of FERC, NERC, RRO and the Registered Entities program and documents and detailed folder / file structure for filing evidence for each Reliability Standard. This folder/file structure, when used in conjunction with the evidence lists developed in the CEM documents, allows for an easy format and organization for completing periodic internal compliance reviews for each Reliability Standard.

## COMPLIANCE PROGRAM EVALUATION

Most Registered Entities have set up internal compliance programs to regularly monitor compliance with the standards. The Regional Reliability Organizations have developed specific evaluation criteria in the form of a Compliance Program Audit Worksheet (CPAW), to evaluate a Registered Entities program. The CPAW uses a fairly rigid grading scale. A near perfect score is necessary to receive the highest program evaluations.

If a Registered Entity has a violation, its internal compliance program can help mitigate penalties or sanctions. The "credit" given for an internal compliance program is based on the regions evaluation of your program using the CPAW. Credit for self-reporting a violation and the quality of your internal compliance program can be the two most important factors in reducing a penalty or sanction. MPC will evaluate your program using the CPAW as would the region. As part of the evaluation, MPC will provide feedback on suggested improvements that should be made to your program.

## COMPLIANCE PROGRAM MANAGEMENT

Registered Entities now carry the responsibility of maintaining compliance with the NERC and regional reliability standards. With this responsibility comes an enormous investment of time and financial resources. An even greater challenge is finding qualified employees to oversee and understand the complicated process of maintaining a current compliance program within an industry where the standards are still developing and violations come with a hefty price.

A Registered Entity cannot risk a faltering internal compliance program or an audit with violations. However, there is a solution that can save a company time, staff resources and thousands of dollars in penalties and violations.

The *MPC Compliance Monitoring and Reporting Program (CMRP)*, provides constant compliance monitoring for the Registered Entity and relieves the Registered Entity of many day-to-day compliance responsibilities; such as, internal compliance monitoring, monitoring of regional compliance web portals, preparation and submittal of mandatory compliance reports, monitoring new, and revisions to, reliability standards, monitoring changes to NERC and regional compliance programs and industry updates regarding compliance matters. The MPC CMRP is designed in a modular format and can be custom designed to meet the needs of your company.

## RELIABILITY STANDARDS UPDATES

All NERC and Regional Reliability Standards are currently under some form of revision. Many of the revisions are based on direct and detailed FERC instructions. As existing standards are revised or new standards implemented, a Registered Entity must update many programs, procedures, evidence files and subject matter expert training. The MPC Monthly Standards Report can provide the Registered Entity with an insight to the status of future standards changes that will affect the Registered Entity and allow for necessary changes to be implemented before the new or revised standards become effective.



## PRODUCTS AND SERVICES

McCoy Power Consultants provides a wide set of services to help companies with the development of procedure and program documents, training programs, process and controls implementation, and root cause analysis. These services are provided both for the normal implementation of a company's normal business practices and for compliance with the NERC Reliability Standards.

### PROCEDURES AND PROGRAM DEVELOPMENT

MPC will develop of procedures and program documents that Registered Entities are required to have for compliance with the NERC and regional Reliability Standards. As an example, MPC can develop the following procedures and programs:

- Sabotage Reporting Procedures
- Cyber Security Policies
- Risk Based Assessment Methodology
- Disturbance Analysis Program
- Facility Connection Requirements
- Facility Rating Methodology
- Facility Rating Tables
- Protection System Maintenance Program
- Protection System Misoperation Evaluation Procedure
- Outage Coordination Procedures
- Outage Coordination Process Flowcharts
- System Restoration Plans
- Loss of Control Center Plans
- Transmission Operation Procedures
- Transmission Vegetation Management Program
- Voltage and VAR Control Procedures

MPC has templates that are used for the development of these programs and procedures. MPC can also develop any additional maintenance or operational procedures an entity desires regardless if they are required for NERC compliance or not.

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## TRAINING PROGRAMS AND MODULES

MPC develops training programs and training modules based on the Systematic Approach to Training (SAT). Whether developing a full system operator training program or individual training modules MPC starts with a Job Task Analysis (JTA). The JTA ensures that the program or module provides training specifically required for the tasks associated with the training activity. All MPC training programs and training modules are based on a clear set of learning objectives and include a student evaluation to ensure the required knowledge transfer and learning occurred during the training.

MPC has developed training templates that will help Registered Entities with compliance with NERC Reliability Standard PER-005-1 – System Personnel Training. This standard became fully enforceable on April 1, 2013 and requires the identification of Bulk Electric System (BES) reliability related tasks performed by the system operator. The MPC JTA will identify these tasks. The new standard also requires that the system operator receive training on the identified reliability related tasks using the SAT methods. MPC can design and build your complete training program or individual training modules as needed.

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## RISK BASED ASSESSMENT METHODOLOGY (RBAM)

MPC offers a Risk-Based Assessment Methodology and Evaluation Worksheet specifically for whether BES facilities are considered critical and subject to compliance with all NERC cyber security standards. The RBAM and evaluation worksheet provides a simplified, yet well documented methodology and evaluation worksheet that can be used to clearly demonstrate to the auditor the evaluation method and results for any BES facilities.

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## PROCESS AND CONTROLS IMPLEMENTATION

MPC offers evaluation of any company's implementation of their procedures and programs. From this evaluation, MPC can help the company develop and implement process and controls to ensure that procedures and programs are implemented by system operators, system planners and maintenance personnel. Correct implementation of procedures and programs can lead to increased reliability and ensure that adequate compliance evidence is maintain to demonstrate compliance with the NERC reliability standards.

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## ROOT CAUSE ANALYSIS

A Root Cause Analysis (RCA) is typically used as a reactive method of identifying event(s) causes, revealing problems and solving them. Analysis is done after an event has occurred. Insights in RCA may make it useful as a preemptive method to prevent future similar issues or events.

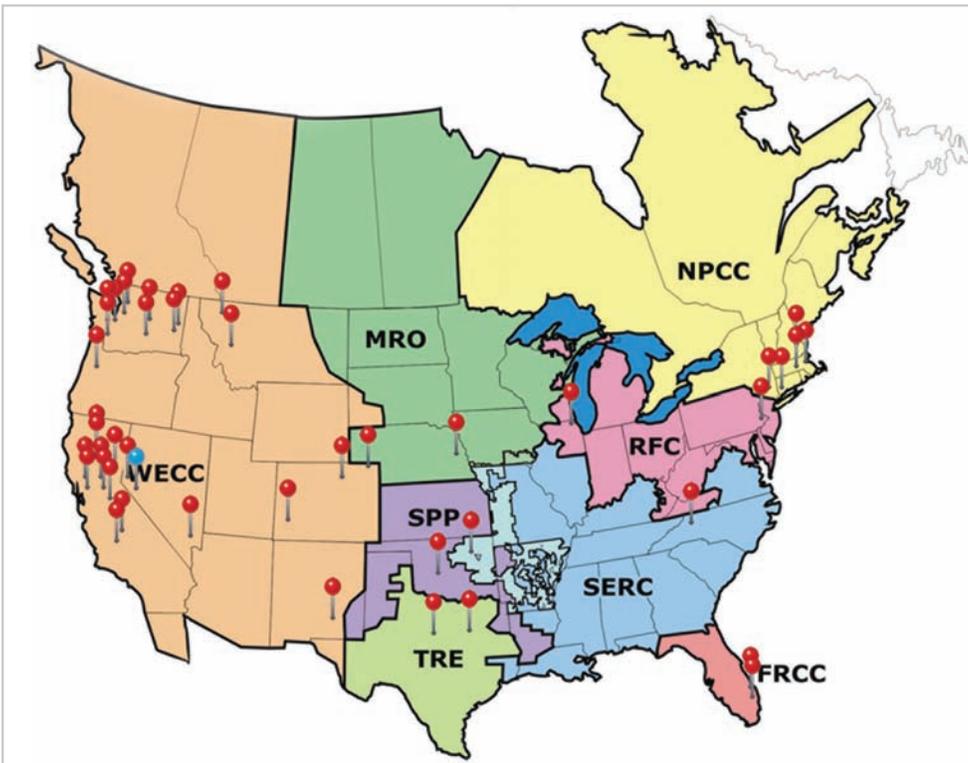
MPC can conduct a root cause analysis for a company for a wide variety of issues or events. The results of the root cause analysis then will be used to improve a company's business processes. In addition, a RCA can be useful in determining the cause of a NERC Reliability Standard violation.



### MPC CLIENT LOCATIONS AND NERC REGIONS MAP

McCoy Power Consultants Inc. (MPC) provides consulting services to Registered and non-Registered Entities in Regions through-out the United States. MPC represents a diverse clientele ranging from large investor owned utilities and municipalities to small generators, municipalities, PUDs, REA's, marketing and planning entities.

MPC does not disclose the names of our clients due to non-disclosure requirements; however, we include a client reference sheet with our bid packets or in preliminary conversations regarding a potential client's scope of work, if applicable. MPC requires a Non-Disclosure Agreement (NDA) to be executed prior to disclosing our client reference list.



If you would like McCoy Power Consultants to participate in an upcoming project, you can contact Steve McCoy at 775-782-6901 or an RFP can be sent to McCoy Power Consultants, PO BOX 750, Minden, NV 89423 or email PDF to [smccoy@mccoypwr.com](mailto:smccoy@mccoypwr.com).



## INDUSTRY RESOURCES

Whether assisting an entity with their compliance program or discussing compliance with a potential client, McCoy Power Consultants Inc. (MPC) strives to make the complicated subject of NERC compliance comprehensible.

Below are some resources we want to share with website viewers that seek additional information to understanding the scope of NERC compliance. Click on any link below and it will take you directly to the associated website for up-to-date information for industry news.

### INDUSTRY RESOURCES

- [Federal Energy Regulatory Commission \(FERC\)](#)
- [North American Electric Reliability Corporation's \(NERC\)](#)

### REGIONS

- [Florida Reliability Coordinating Council, Inc. \(FRCC\)](#)
- [Midwest Reliability Organization \(MRO\)](#)
- [Northeast Power Coordinating Council, Inc. \(NPCC\)](#)
- [SERC Reliability Corporation \(SERC\)](#)
- [Southwest Power Pool \(SSP\)](#)
- [Texas Reliability Entity, Inc. \(TRE\)](#)
- [The Western Electricity Coordinating Council \(WECC\)](#)

### INDEPENDENT SYSTEM OPERATORS (ISO)

- [The California Independent System Operator Corporation \(CAISO\)](#)
- [Independent System Operator - New England \(ISO-NE\)](#)
- [The New York Independent System Operator \(NYISO\)](#)

## ADDITIONAL LINKS OF INTEREST

[White House Executive Orders – Improving Critical Infrastructure - Cybersecurity Executive Order - Cybersecurity](#)

[International Council on Large Electric Systems \(CIGRE\)](#)

[Institute of Electrical and Electronic Engineers \(IEEE\)](#)

[American Power Dispatchers Association Inc. \(APDA\)](#)

## INDUSTRY ACRONYMS

In the electrical industry, the use of acronyms is a very common way of communicating. This also holds true with the NERC Reliability Standards and the language of compliance. To help you understand some of the more widely used acronyms, MPC has put together a list of the more common acronyms used in the electrical utility industry and NERC Compliance.

**ANSI** – American National Standards Institute  
**BA** – Balancing Authority  
**BAA** – Balancing Authority Area  
**BES** – Bulk Electric System  
**BIL** – Basic Insulation Level  
**BSL** – Basic (Switching) Surge Level  
**CEC** – California Energy Commission  
**CERCLA** –Comprehensive Environmental Response, Compensation, and Liability Act  
**CIP** – Critical Infrastructure Protocols  
**CPUC** –California Public Utilities Commission  
**DP** – Distribution Provider  
**ECC** – Energy Control Center  
**EMS** – Energy Management System  
**FPA** – Federal Power Act  
**IA** – Interchange Authority  
**IA** – Interconnection Agreement  
**IEC** – International Electro-technical Commission  
**IED** – Intelligent Electronic Devices  
**IEEE** – Institute of Electrical and Electronics Engineers  
**kVAR** – Kilovolt-Amp Reactive  
**KV** – Kilovolt  
**KWh** – Kilowatt-hour  
**LSE** – Load Serving Entity  
**MVAR** – Megavolt-Amp Reactive  
**MW** – Megawatt  
**NAESB** – North American Energy Standards Board  
**NEMA** – National Electrical Manufacturer’s Association  
**NERC** – North American Electric Reliability Council  
**NESC** – National Electrical Safety Code  
**OSHA** – Occupational Safety and Health Administration  
**PA** – Planning Authority  
**PLC** – Programmable Logic Controller  
**POI** – Point of Interconnection  
**PSE** – Purchase Selling Entity  
**RC** – Reliability Coordinator  
**RP** – Resource Planner  
**RTU** – Remote Terminal Unit  
**SCADA** – Supervisory Control and Data Acquisition  
**SGIA** – Small Generator Interconnection Agreement  
**SHPO** – State Historic Preservation Officer  
**TO** – Transmission Owner  
**TOP** –Transmission Operator  
**TP** – Transmission Planner  
**WTG** – Wind Turbine Generator



## MPC CONSULTANTS CONTACT INFORMATION

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