

FINAL REPORT

Standards of Conduct ID: SOC 2010-1

Submitted by: Dennis Reed

Date: December 17, 2010

Issue:

Inappropriate access to a restricted area.

Reason:

The Westar General Office building and the adjoining 800 Kansas building are under the same electronic access control system. Several areas of these buildings have restricted access due to the Standards of Conduct rules. Restricted areas include the third floor of the General Office which contains Transmission Operations, the ninth floor of the General Office where programmers who support the Energy Accounting System are located, and part of the first floor of the 800 Kansas building where the Marketing Function is located. For most of the other areas of the buildings, all employees are granted general access.

As part of moving Westar's Human Resources Department from the seventh floor to the fifth floor of the General Office building, Joe Hemmer, a contractor working for Westar's Facilities Security group, was in charge of making changes to the security clearance code access system. While making those changes, he noted that the ninth floor East (back) stairwell door was not part of the general (800/818 Employee General Access) clearance code unlike the other East stairwell doors above the third floor, so he added it. This was done on December 29th, 2009. Once this change downloaded to the security software, access to the ninth floor east stairs door was now on all cardholders access cards that had the General 800/818 Employee General clearance code)¹. On December 29, 2009, the contractor added this door to the general access code thus allowing all employees with this code the ability to gain access through that door to the ninth floor.

As part of normal security process an automatic e-mail was sent to Transmission Accounting on December 30, 2009, however, due to the size of the list it was interpreted as a malfunction of the reporting system. No review of the changes made by the Contractor was performed by the Facilities Management group. The error was discovered on January 19, 2010, in the normal quarterly review of access pursuant to Westar's Policies.

Once the error was recognized, Facilities Management was notified and the door was removed from general access. A review of all persons entering the ninth floor through the back stairwell was made. No persons, other than those authorized to enter the ninth floor, gained access through the East stairwell door.

¹ The back stairwell of the General Office is a stairwell-only access (no elevator) located in the Northeast side of each floor and is primarily used for evacuation purposes. However, some employees do make use of the stairwell to move between floors rather than taking the elevator located through an entrance on the Southwest side of the floors.

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Impact:

None. During the period when the access restriction was inoperative, only employees authorized to access the ninth floor entered the area through the door. Since no notice of the access change was sent to the employees, no unauthorized employees had the knowledge that they could have gained access to the ninth floor through the stairwell door.

Resolution:

The following steps have been taken or are underway:

1. Access through the Northeast Stairwell was removed from the general access code within 3 hours of the discovery of the problem.
2. A review of the procedures related to adding or deleting doors as part of an access group was completed. Westar has decided to take the following steps:
 - a. Provide additional training on the SOC for the contractor. [**Completed Jan. 19, 2010**]
 - b. Establish a policy such that no changes to the doors contained in an access control group may be changed without supervisor approval. [**Completed June 1, 2010. Also, Facilities has started a comprehensive review of its procedures with an outside vendor to be completed in early 2011.**]
 - c. Require a review of any changes to the access control software made by an employee or contractor by a person other than the person making the change to confirm the access changes were properly made. [**Completed, see answer to b.**]
 - d. Expand the distribution list of the e-mail documenting any changes to the security code system to include at a minimum: Manager Security; Director of FERC Compliance; those employees in Transmission Accounting charged with monitoring and implementing the Standard of Conduct policies. [**Completed: the Manager of Security, two additional employees in Security Services, the Director of FERC Compliance and one additional employee in Transmission Accounting charged with monitoring and implementing the Standards of Conduct policies have been added to the distribution list on January 30, 2010.**]
 - e. Modify the access control change report created by the security software to make it more readable. [**Completed February 28, 2010**]
 - f. Implement a change to the way the clearance codes are displayed in the access control software to make restricted access doors more easily recognizable. [**Completed: Effective June 1, 2010**]

Attachments:

1. Policy – Clearance Code Change Procedure.
2. Floor plan of the 9th Floor.
3. Affidavit of Joseph Hemmer Contractor.

**AFFIDAVIT OF JOSEPH HEMMER
STANDARDS OF CONDUCT EVENT
OASIS POSTING NO. SR2010-1**

I. Introduction

My name is Joseph Hemmer. I am an Engineered Security Technician for CBS Integration, a division of CBS Manhattan. I work as a contractor assigned to Westar Energy, Inc. (Westar). My business address is 818 S. Kansas Avenue, Topeka, Kansas 66612. I have worked as a contractor for Westar for over ten years. My duties are to install, program, troubleshoot and support Westar's access control system (software, equipment, licensing) and Westar's CCTV systems.

I am submitting this affidavit to the Commission's enforcement staff in conjunction with Westar's OASIS Posting No. SR2010-1.

II. Access to 9th Floor East Stairwell Door

In December 2009, Westar was in the process of moving its Human Resources department from the 7th floor of its General Operations building to the 6th floor of that same building. I was responsible for making changes to the security clearance code access system that were necessary as a result of this move. I was changing access in clearance codes between the 6th and 7th floors, which included making changes to the clearance code, "TOP. G.O. 800/818 GENERAL EMPLOYEE W/O *800 PARKING" (General Employee Access Code). I was removing the 6th floor from the General Employee Access Code and adding the 7th floor.

At the same time I was working on changes related to the Human Resources department's move, Westar was also having readers installed on all of its East stairway doors. I was responsible for adjusting access clearance codes to account for these new readers.

On December 29, 2009, I was in the process of making changes related to both of these projects. I inadvertently included the ninth floor East (back) stairwell door in the group of East stairwell doors I was adding to the General Employee Access Code.

Late in the day on January 18, 2010, Sandra Bayless, Manager, Security for Westar, was notified of the access code changes related to the 9th floor East stairwell door. I understand that she immediately removed the 9th floor East stairway door from the General Employee Access Code. Ms. Bayless then asked me to run an audit report related to the clearance codes for the East stairwell doors. I ran this audit report on January 19, 2010. After I ran this audit report, I realized that I had mistakenly added the 9th floor East stairway door, which should have restricted access for Standards of Conduct purposes, to the General Employee Access Code. I discussed this mistake with Ms. Bayless when I provided her the report.

This concludes my affidavit.

**AFFIDAVIT OF JOSEPH HEMMER
SELF REPORT OF A
STANDARDS OF CONDUCT EVENT**

County of Shawnee)
)
State of Kansas) ss:

I, Joseph Hemmer, being duly sworn, depose and state that the contents of the foregoing affidavit are true, correct, accurate and complete to the best of my knowledge, information, and belief.



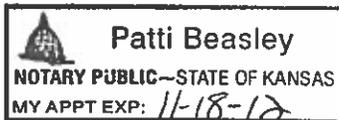
Joseph Hemmer

Subscribed and sworn to before me this 5th day of February, 2010

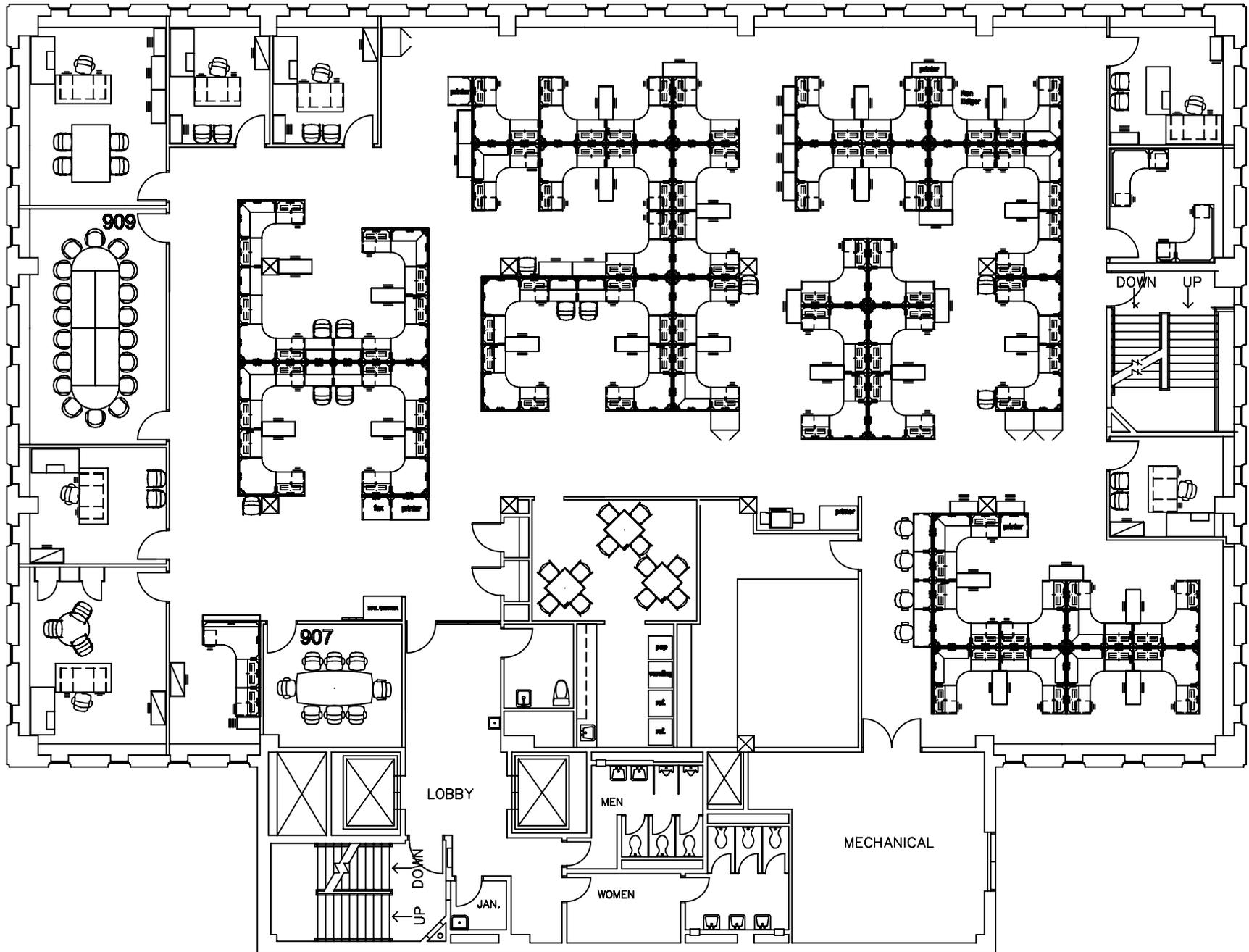
My commission expires: 11-18-12



Notary Public



WESTAR ENERGY
818 S KANSAS AVE



NINTH FLOOR PLAN