



U.S. Department of Energy
Office of Inspector General
Office of Audit Services

Audit Report

Management of the Federal Energy
Regulatory Commission's Information
Technology Program




Department of Energy

Washington, DC 20585

June 30, 2004

MEMORANDUM FOR THE CHAIRMAN, FEDERAL ENERGY REGULATORY COMMISSION

FROM:


Gregory H. Friedman
Inspector General

SUBJECT:

INFORMATION: Audit Report on "Management of the Federal Energy Regulatory Commission's Information Technology Program"

BACKGROUND

In Fiscal Year 2003, the Federal Energy Regulatory Commission devoted approximately \$9.3 million of its \$23 million information technology budget to the development, operation, and maintenance of its systems. Much of this activity was intended to satisfy the President's Management Agenda initiative to expand electronic government in order to make information and services more accessible to the public and Commission staff through the Internet. In an effort to streamline its operations, in 1999 the Commission deployed its FERC Automated Management Information System (FAMIS) to provide a web-based system for internal document tracking and workload management. Recently, the Commission launched FERC Online, a \$31 million project that consolidated nine separate development initiatives designed to provide a web-based system for managing both public and internal information.

Because of the importance of an effective information technology (IT) management approach to satisfying Presidential priorities and improving service delivery to the regulated community, we initiated this audit to determine whether the Commission had efficiently and effectively managed its systems-related investments.

RESULTS OF AUDIT

The audit disclosed that the Commission had initiated action to improve the management of its IT program. However, we concluded that this effort could have been enhanced through better project planning and management. For example:

- Of the six FERC Online modules with significant development underway, four did not meet their initial target implementation dates; and,
- FAMIS, developed at a cost of about \$11 million to satisfy Year 2000 remediation and other system modernization requirements, did not fully satisfy mission needs. As a result, the Commission decided to phase out the system after only three years of operation.



The effectiveness of the Commission's system development activities could have been improved by developing an enterprise architecture, implementing a capital planning and investment control process, and by thoroughly applying project management techniques. Absent such tools, management lacked information needed to determine what systems and features were required for mission accomplishment, could not adequately evaluate progress to completion, or could not effectively determine the necessary total system investment. Without improvement, the Commission risks incurring unnecessary costs for systems that face premature obsolescence because they do not meet user needs or satisfy mission requirements.

MANAGEMENT REACTION

Management generally concurred with the intent of the report's recommendations, but believed that the report did not address the critical issues or actions that the Commission faced in the past two years in the management of its IT systems. Rather, management felt that many of the issues raised in the report had already been identified in an independent study commissioned two years ago.

We examined the impact of the Commission's 2002 independent study, the goal of which was to evaluate IT management practices. To its credit, as a result of the study, the Commission reorganized the Chief Information Officer's office, and refocused its IT related efforts by reducing support staff by 50 percent, contracting for needed expertise, and reducing overall costs by about \$5 million. During our audit, the Commission also finalized its Capital Planning and Investment Control Guide and its System Development Life Cycle Guide. Further, in its FY 2005 budget request, the Commission included a performance goal to complete an enterprise architecture by October 2004.

The Commission's efforts to improve its IT program are noteworthy and, if fully implemented, should provide a structured process for evaluating, selecting, developing, and overseeing projects in the future. However, based on our audit of current projects ongoing since completion of the independent study, we concluded that additional action is necessary to enhance software development practices. To that end, we have made several recommendations designed to improve effectiveness of IT management at the Commission.

Management's comments are summarized beginning on page 4 of the report and are included in their entirety as Appendix 3.

Attachment

cc: Executive Director, Federal Energy Regulatory Commission
Chief of Staff, Department of Energy
Chief Information Officer, Department of Energy

REPORT ON MANAGEMENT OF THE FEDERAL ENERGY REGULATORY COMMISSION'S INFORMATION TECHNOLOGY PROGRAM

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SYSTEMS PLANNING AND DEVELOPMENT

Development Activities The Federal Energy Regulatory Commission's (Commission) critical eGovernment development efforts suffered from incomplete project cost estimates, schedule slippages or faced premature obsolescence.

FERC Online

Our review of the FERC Online project disclosed that certain modules had missed target dates or significantly underestimated project costs. The FERC Online project, initiated in May 2002, consolidated projects -- some of which had been ongoing since 1998 -- to satisfy the requirements of the Government Paperwork Elimination Act. The Act established October 2003 as the deadline for meeting its requirements. Of the six FERC Online modules with significant development underway, we determined that four did not meet their initial targeted implementation dates. FERC Online is currently not scheduled to be fully implemented until Fiscal Year (FY) 2007 at a total cost of about \$31 million. When complete, its nine individual system development modules should provide a web-based, integrated system for managing public and internal documents and information.

While the eLibrary initiative (a component of the FERC Online project) was delayed due to situations beyond the Commission's control, we noted that management made its decision to initiate that module without a complete cost estimate. Consequently, officials did not consider nearly \$4.4 million in various costs such as disaster recovery planning and document conversion when deciding to go forward.

FERC Administrative Management Information System (FAMIS)

We also observed that, after only three years of operation, the Commission decided to replace FAMIS, one of its major systems. FAMIS was developed and implemented in 1999 to address Year 2000 remediation concerns and to provide document tracking and workload management functions. It is being replaced because it does not meet user needs and is not used extensively. Despite an investment of \$11 million, an internal study noted that the system was underutilized because it had poorly designed interface screens and suffered from slow response times. In 2002, management concluded that the system was not meeting user needs and decided to phase it out. Efforts are now underway to replace FAMIS with several other systems being developed under the FERC Online initiative.

Systems Development Policies

The Commission had not developed organization-wide policies to guide information technology (IT) acquisitions and development efforts. Although required by the Clinger-Cohen Act of 1996 and Office of Management and Budget (OMB) implementing guidance, the Commission had not prepared an enterprise architecture to integrate business processes and organizational goals with IT. While it planned to complete an architecture and had established a related FY 2003 performance goal, the Commission did not meet its goal.

Absent policies to guide its efforts, many of the Commission's development projects were initiated without performing needed planning, capital budgeting, and business process reengineering studies. Specifically, we noted that key planning studies such as feasibility, cost-benefit, and return on investment analyses were never completed for a number of the FERC Online modules. Cyber related actions such as risk assessments and security planning had also not been performed to ensure that each of the modules operated securely. We also observed that the soon to be phased-out FAMIS project largely automated a number of inefficient manual processes and was undertaken without business process reengineering.

In addition, the Commission had not always applied project management techniques for IT investments. The Commission had not fully implemented a structured system development methodology to manage its systems development projects although it had approved the methodology in September 2002. As noted in Federal guidance, a structured methodology can help ensure that projects meet their goals by providing a structured series of development steps. In particular, we found that project cost and schedule baselines, information essential for executive oversight, had not been prepared prior to beginning development for six of the nine FERC Online modules, including the eLibrary module. Management thus lacked information needed to determine what systems and features were required for mission accomplishment, could not adequately evaluate progress to completion, or determine the total system investment necessary.

Cost and Implementation Schedule

The Commission's goal to strategically manage resources through secure and efficient eGovernment initiatives and through effective workflow systems may be unattainable without improvement. It risks incurring unnecessary costs for systems that face premature

obsolescence because they do not meet users' needs or satisfy mission requirements. Overall, the Commission's system developments are at risk of failing to meet the objectives of the President's Management Agenda for expanding electronic Government and the Commission's goal to strategically manage agency resources.

**Ongoing Improvements
In Managing IT
Activities**

The Commission has made improvements in managing its IT activities. Specifically, we noted that it had drafted an initial Enterprise Architecture which management hopes to issue by October 2004; issued a Capital Planning and Investment Control Process guide in April 2004; and had begun to implement a systems development methodology for new projects. Management also told us that it had initiated the use of Earned Value Management to determine if an IT development project is cost effective. Additionally, the Commission had focused training resources on project management, submitted IT-related performance measures to OMB along with their business cases for major systems, drafted a Continuity of Operations Plan, and updated a Disaster Recovery Plan for mission critical systems.

While the above actions are noteworthy, additional actions are necessary to ensure that key processes are fully implemented to ensure that IT initiatives are properly managed to help meet user and mission needs. For instance, the Commission had not reviewed its ongoing projects to determine to what extent its system development methodology could be applied. At the time of our review, only two of the FERC Online modules had documented risk assessments and none had a security plan. Also, the Commission had not established project cost baselines for three of the modules.

RECOMMENDATIONS

Although the Commission had made improvements in its systems development activities, further steps need to be taken to improve the management of its IT resources. To that extent, we recommend that the Executive Director:

1. Complete the development of and implement an enterprise-wide architecture to provide a roadmap to guide and direct acquisitions and development efforts;

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2. Ensure the full implementation of the capital planning and investment control process for prioritizing, selecting, and managing investments and ensuring that they are aligned with the agency's strategic plan and mission;
 3. Ensure the full implementation of appropriate project management techniques to new projects by applying a system development methodology that provides a structured approach for designing and developing new information systems; and,
 4. Review ongoing development projects and, where appropriate, ensure that critical development steps are applied to help ensure their efficient and timely completion.

MANAGEMENT REACTION

Management generally concurred with the intent of the report's recommendations, but believed that the report did not address the critical issues or actions that the Commission faced in the past two years in the management of its IT systems. Rather, management felt the report covered projects initiated prior to improvements made to its system development methodology and repeated many of the issues that had already been identified in an independent study. The study's results prompted a reorganization of the Commission's Office of the Chief Information Officer resulting in the use of appropriate management techniques and significant improvements in operations.

Management indicated that the Commission is on schedule to meet target dates for FERC Online and that our report used initial rough order of magnitude estimates in concluding that target dates were not met. With regard to the eLibrary module of FERC Online, management stated that our analysis of project cost estimates incorrectly included costs not associated with development. Management clarified at the exit conference, that at least some portion of these costs were related to conversion of archived records and were, therefore, optional. Management also stated that planning documents were missing for only small projects that were part of FERC Online.

With regard to FAMIS, management stated that the system is meeting mission needs and is expected to have a life-cycle greater than five years which is comparable to industry standards.

AUDITOR COMMENTS

Management's comments are partially responsive to our recommendations. Our review included the vast majority of the active projects in the Commission's system development portfolio, many of which were initiated prior to 2003. Our review of these projects included a determination of whether the Commission had

made changes to the projects as a result of improvements it was making to its systems development methodology. Although an independent study performed in 2002 did highlight many of the same problems that we identified, the fact that the Commission had still not developed an enterprise architecture or fully implemented a capital planning and investment control process system and a system development methodology nearly two years later demonstrate problems in implementing needed corrective actions. While we agree that management was proactive in performing the systems study, more needs to be done to ensure that development problems are addressed in a timely manner. As we have noted in our report, the Commission has taken a number of positive corrective actions.

We do not concur with a number of management's assertions regarding the effectiveness of its systems development activities. Regarding management's statement that it is on target for meeting FERC Online target dates, we found that four of six modules with significant development underway did not meet their initial target implementation dates, including the statutory October 2003 deadline for implementing the requirements of the Government Paperwork Elimination Act. The target dates management is currently using to guide the project were revised in 2003 in order to present realistic implementation dates in response to the Office of Management and Budget's information technology budget call for FY 2005. Based on current estimates, however, FERC Online is not expected to be fully implemented until FY 2007.

Also, we do not agree with the Commission's position that costs for disaster recovery planning and data conversion activities should not have been considered in its decision to proceed with eLibrary. Regardless of the timing of these costs, they should have been considered by the Commission in its decision to proceed with the eLibrary initiative as required by Office of Management and Budget circulars.

In addition, we do not agree with management's assertion that planning documents for FERC Online were missing for only small projects. Specifically, we found that planning documents such as risk assessments, security plans, and cost and schedule baselines were missing for major modules of FERC Online, most of which have incurred actual development costs in excess of \$1 million to date.

Regarding management's assertion that FAMIS is meeting its mission needs, we found that the Commission's own study showed that FAMIS had been underutilized from implementation because of user dissatisfaction. The same study determined that FAMIS did not meet one of its main reengineering requirements, automated workload management, which was a primary mission need.

Where appropriate, we have incorporated management's technical comments in the body of this report. Management's comments are included in their entirety in Appendix 3.

Appendix 1

OBJECTIVE

To determine whether the Federal Energy Regulatory Commission (Commission) had efficiently and effectively managed its system-related investments.

SCOPE

The audit was performed between April 2003 and May 2004 at the Federal Energy Regulatory Commission in Washington, DC. Specifically, we performed a comprehensive review of the agency's key processes for managing information technology resources.

METHODOLOGY

To accomplish our objective, we:

- Reviewed applicable laws, regulations, guidance and best practices pertaining to managing information technology resources and initiatives. We also reviewed relevant reports issued by the Office of Inspector General and the General Accounting Office;
- Reviewed the Government Performance and Results Act of 1993 and determined if performance measures had been established for managing information technology resources;
- Reviewed numerous documents related to the Commission's management of information technology resources, including system development project documentation; and,
- Held discussions with program officials and personnel from the Commission.

The audit was conducted in accordance with generally accepted Government auditing standards for performance audits and included tests of internal controls and compliance with laws and regulations to the extent necessary to satisfy the audit objectives. Accordingly, we assessed internal controls regarding the management of the Commission's information technology program. Because our review was limited, it would not necessarily have disclosed all internal control deficiencies that may have existed at the time of our audit. We did not rely on computer-processed data to accomplish our audit objective.

An exit conference was held with Commission officials on June 24, 2004.

Appendix 2

PRIOR REPORTS

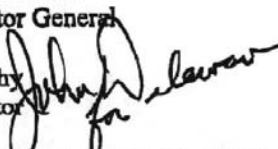
- *Evaluation of The Federal Energy Regulatory Commission's Cyber Security Program-2003* (OAS-L-03-21; September 2003). During the evaluation of the Commission's unclassified cyber security program, we found that significant progress was made in resolving weaknesses reported during the 2002 evaluation. However, plans for maintaining or resuming critical operations in the event of an emergency or disaster had not been completed.
- *Evaluation Report: The Federal Energy Regulatory Commission's Unclassified Cyber Security Program 2002* (DOE/IG-0569; September 2002). The evaluation of the Commission's unclassified cyber security program found that while a number of protective measures had been implemented, certain critical information systems remained at risk. Cyber protection efforts suffered from program management, planning, and execution weaknesses.
- *Special Report: The Department of Energy's Implementation of the Clinger-Cohen Act of 1996* (DOE/IG-0507; June 2001). The report stated that while the Department had taken action to address certain information technology related management problems, it had not been completely successful in implementing the requirements of the Clinger-Cohen Act of 1996. Specifically, the Department had not satisfied major requirements of the Act to develop and implement an integrated, enterprise-wide, information technology architecture; closely monitor policy implementation efforts; and acquire information technology related assets in an effective and efficient manner.
- *Information Technology: A Framework for Assessing and Improving Enterprise Architecture Management (Version 1.1)* (GAO-03-584G; April 2003). In this report, GAO stated that the importance of developing, implementing, and maintaining an enterprise architecture is a basic tenet of both organizational transformation and information technology management. Managed properly, an enterprise architecture could clarify and help optimize the interdependencies and relationships among an organization's business operations and the underlying information technology infrastructure and applications that support these operations. Further, when employed in concert with other important management controls, such as portfolio-based capital planning and investment control practices, architectures can greatly increase the chances that organizations' operational and information technology environments will be configured so as to optimize mission performance.

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

April 14, 2004

Office of the
Executive Director

MEMORANDUM TO: Rickey R. Hass
Science, Energy, Technology,
and Financial Audits
Office of Audit Services
Office of Inspector General

FROM : Thomas R. Herlihy 
Executive Director

SUBJECT : Management Comments on DOEIG draft audit report
titled "Management of the Federal Energy Regulatory
Commission's E-Government Initiatives"

We appreciate the opportunity to respond to the subject draft report. In general, we believe that the report does not address the critical issues or actions that FERC has faced in the last two years in the management of its Information Technology (IT) systems. Instead, the report repeats many of the issues that had already been identified in an independent study we commissioned and acted on two years ago. The results of that study prompted us to improve our IT operations and work to make them more cost effective.

Our actions since the independent study have had a dramatic impact on reducing IT costs and in realigning our resources with FERC's business and strategic plans. We used the study's recommendations to reprioritize tasks, reduce staff, and reorganize the Office of the Chief Information Officer (CIO) to accomplish priorities more effectively. This refocused our IT budget on the core capabilities we needed and facilitated development of a more structured approach to project management. We believe that these reforms have improved IT functioning and employee productivity agency wide; while saving approximately \$5 million a year in resources that can be put to better use.

Our specific responses to your audit recommendations are attached. If you require further assistance please contact Matthew Sweet at (202) 502-8926.

Attachment

FEDERAL ENERGY REGULATORY COMMISSION Response to the E-Government Audit Recommendations

Recommendation 1: Ensure the full implementation of appropriate project management techniques to new projects, to include a system development methodology that provides a structured approach for designing and developing new information systems.

Concur. Since the reorganization of the CIO two years ago, we have been using appropriate management techniques that have resulted in significant improvements in operations. This report covers IT projects initiated prior to 2002; when we had a completely different CIO organization and had many deficiencies. We observed problems like the report mentions which led us to initiate an independent study. The study was performed by Integrated Data Systems (IDS) in 2002, and titled: "FERC Information Technology Review and Assessment". The results of this study prompted us to reorganize the CIO office including changing CIO's and reducing the staff by 50 percent.

We are committed to improving our IT processes to effectively manage our resources. In the last year we have: (1) drafted an initial Enterprise Architecture (EA) which should be published by October 2004; (2) issued in April 04, a Capital Planning and Investment Control process; (3) initiated the use of Earned Value Management (EVM) to determine if an IT development project is cost effective; (4) focused training resources on project management; (5) developed IT-related performance measures that we submitted to OMB with our business cases for major systems; (6) drafted a Continuity of Operations Plan (COOP); and (7) updated a Disaster Recovery Plans (DRP) for mission critical systems. We participate in federal E-Gov initiatives to the extent it is cost-effective for us as a small agency. We also have implemented a systems development life cycle (SDLC) process and formalized our configuration management process.

Recommendation 2: Review ongoing development projects and, where appropriate, ensure that critical development steps are applied to help ensure their efficient and timely completion.

Concur in Principle. We recognize the need to improve the project management processes in place. We have a draft of our initial Enterprise Architecture (EA) document and plan to publish it by October 2004. Our overarching management intent is to ensure that the Commission's IT program is cost-effective and meets the requirements of our strategic and business plans.

FEDERAL ENERGY REGULATORY COMMISSION Response to the E-Government Audit Recommendations

Improvements in IT initiatives have been made since we conducted our independent study in 2002, and we will review our ongoing development projects and determine; based on size, scope, and risk, what development steps need to be improved. Our specific comments to examples described in the report are listed below.

(1). FAMIS was rapidly deployed in October, 1999 to replace mainframe-based systems that were not Y2K-compliant. This had the added benefit of providing us considerable savings by eliminating our costly mainframe. FAMIS was modified and enhanced through 2002 to address new requirements and correct problems associated with the rapid deployment. But the decision to phase out FAMIS was made carefully and supported by a well-documented business case. FAMIS might have benefited from better project management and formalized investment control, but it was developed and deployed under a severe Y2K time constraint that was beyond the control of the project team.

(2). In the first paragraph of the draft audit report it states: "We observed that the Federal Energy Regulatory Commission critical e-Government development ... suffered from significant underestimating of project costs, schedule slippage or premature obsolescence."

Schedule slippage was caused by accepted increases in scope; the scope of the module was increased to support requirements for Critical Energy Infrastructure Information (CEII). During the California energy crisis in 2001, FERC was compelled to store key California investigation documents using the module while it was in beta/user acceptance testing. This complicated production deployment and lengthened the duration of user acceptance testing. FAMIS is in its fourth year of operation and is meeting its mission needs and is planned to have a life-cycle greater than 5 years which is comparable with industry standards.

(3). In the second paragraph of the audit report it states: "Of the six modules with significant development underway, we determined that four were not expected to meet their target implementation dates."

The report refers to initial planning estimates which were rough orders of magnitude estimates. These were refined, and revised and incorporated in the project business case presented to and approved by OMB. At this point we are on schedule with the target dates we reported in the OMB Exhibit 300.

(4). In the second paragraph of the audit report it states: "In addition, we found management based its decision to proceed with the eLibrary initiative based on

FEDERAL ENERGY REGULATORY COMMISSION Response to the E-Government Audit Recommendations

development costs that failed to include, among other things, such items as disaster recovery planning and document conversion. Consequently, development costs were understated by \$4.9 million, nearly double their original estimate.”

The \$4.9 million referred to is for the system life-cycle and includes costs above those required for development. They include costs for document handling, microfilm production, public reference room operation, records center facilities, off-site hosting, and back file conversion. Our projected development cost for FERC-On-Line was approximately \$5.0 million and the actual cost was \$5.1 million. In a project of this size \$100 million or 2% of cost growth for development is better than private sector industry averages and significantly better than federal averages.

(5). In the third paragraph of the audit report it states: “We learned that FAMIS ..., does not meet user needs and is not used extensively.” This statement is over-generalized. One module in FAMIS out of 7 is not widely used; that is the document collaboration module. The other six modules are used everyday and are relied upon for the Commission to conduct business.

(6). In the third paragraph of the audit report, on the last line, it states: “FERC Online initiative at a yet to be determined cost.” Costs for FERC Online have been determined and are documented and reported to OMB in the budget Exhibit 300.

In the fifth paragraph of the audit report it states: “Specifically, we noted that key planning studies ... were never completed for a number of the FERC Online modules.”

The modules referred to are small systems, such as mailing lists and schedule of Commission agenda items, for which development began prior to 1999. They were later integrated into FERC Online and were in Operations and Maintenance when FERC Online started. The resources spent on going back and doing planning and feasibility studies on modules that have already been deployed and operating would not be cost-effective.

(7). In the last line of the fifth paragraph of the audit report, it states: “We also observed that ...FAMIS... automated a number of inefficient manual processes... without business process reengineering.”

This statement fails to mention that the considerable resources the Commission invested into business process reengineering during the “FERC First” project. Some modules of FAMIS incorporated that reengineering; others emphasized rapid, minimally disruptive replacement of non-Y2K compliant mainframe systems.

FEDERAL ENERGY REGULATORY COMMISSION Response to the E-Government Audit Recommendations

Recommendation 3: Expedite the development and implementation of an enterprise-wide architecture to provide a roadmap to guide and direct acquisitions and development efforts.

Concur. We are committed to publishing an initial Enterprise Architecture (EA) by October of 2004. However, we are in the process of trying to determine what the scope and depth of the EA should be for a small agency.

Recommendation 4: Develop information technology related performance measures, with associated targets, for development of an enterprise architecture.

Concur in Principle. This recommendation seems to be already covered by Recommendations 3 and 5. In Recommendation 3, we concur with implementing an EA, and would subsequently track that as part of our audit follow-up process. In Recommendation 5, the management tool used to align capital planning and investment control with the agency's strategic plan and mission is the EA. In addition, our 2005 budget does contain a performance measure for completing an EA by October, 2004. We will also track our concurrence with all recommendations as part of our management control process.

Recommendation 5: Ensure full implementation of a capital planning and investment control process for prioritizing, selecting and managing investments and ensuring that they are aligned with the agency's strategic plan and mission.

Concur. We have implemented a Capital Planning and Investment Control (CPIC) process, but it is not as elaborate or complex as a fully implemented cabinet level agency CPIC. It is appropriate from a cost/benefit standpoint for a small agency such as ourselves. We communicated the CPIC process Commission-wide in April 2004. Our plan is to begin implementing it in the 3rd quarter of 2004. It will also be incorporated into our business plan and have appropriate resources allocated to it.

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