



Memorandum from the Office of the Inspector General

March 18, 2025

Laura J. Campbell
Rebecca L. Jones
Kevin Lee Tarver

**REQUEST FOR FINAL ACTION – EVALUATION 2024-17485 – GENERAL LEDGER
MODERNIZATION**

Attached is the subject final report for your review and final action. Your written comments, which addressed your management decision and actions planned or taken, have been included in the report. Please notify us when final action is complete. In accordance with the Inspector General Act of 1978, as amended, the Office of the Inspector General is required to report to Congress semiannually regarding audits that remain unresolved after 6 months from the date of report issuance.

If you have any questions, please contact Jessica L. Monroe, Senior Auditor, at (865) 633-7338 or Lisa H. Hammer, Director, Evaluations – Projects, at (865) 633-7342. We appreciate the courtesy and cooperation received from your staff during the audit.

David P. Wheeler
Assistant Inspector General
(Audits and Evaluations)

JLM:KDS

Attachment

cc (Attachment):

TVA Board of Directors
Brett A. Atkins
Angela S. Ballew
Kenneth C. Carnes
Sherri R. Collins
R. Howell Conway
Buddy Eller
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OIG File No. 2024-17485



Office of the Inspector General

Evaluation Report

To the Vice President, Supply Chain;
and to the Vice President, Financial
Operations and Performance; and to
the Director, Information Technology
Portfolio Management

GENERAL LEDGER MODERNIZATION

Evaluation Team
Jessica L. Monroe
Scott M. Norris

Evaluation 2024-17485
March 18, 2025

ABBREVIATIONS

GL	General Ledger
HCM	Human Capital Management
PRB	Project Review Board
RFP	Request for Proposal
SI	System Integrator
SPP	Standard Programs and Processes
T&I	Technology and Innovation
TVA	Tennessee Valley Authority

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Evaluation 2024-17485 – General Ledger Modernization

EXECUTIVE SUMMARY

Why the OIG Did This Evaluation

The Tennessee Valley Authority's (TVA) 5-year Enterprise Technology Plan seeks to transform the way TVA does business through technology and digital innovation. Digital Finance is one of seven efforts within this multi-year initiative, aimed at modernizing and streamlining TVA's financial systems and processes. Modernization of the general ledger (GL) is the first step within Digital Finance. The purpose of modernizing the GL was for "Financial Services to continue to increase its value to TVA" through finding "innovative ways to utilize modern technology and streamline the way financial capabilities are delivered." Desired outcomes for the GL modernization included (1) streamlining financial capabilities through automation, (2) building new skills to elevate Financial Services as a business partner, (3) enhancing career development opportunities through learning new ways of working, and (4) standardizing processes to increase efficiency and enhance customer service.

TVA executed separate contracts for system implementation and the GL software in the summer of 2023. The objectives of the GL Modernization project include implementing an enterprise financial management system with minimal customization, redefining and modernizing TVA's chart of accounts, and modernizing and optimizing boundary systems (applications, systems, or platforms outside of the GL that interface with the GL). The Financial Services strategic business unit is the project sponsor. TVA's Technology and Innovationⁱ is responsible for managing the project. TVA's Supply Chain executed the contracts with the system integrator and software provider and approves purchase orders, including project change requests.

Since its approval, the project has experienced cost increases and schedule delays. Approved funding increased from \$67.1 million to \$104.7 million in November 2023. Although originally estimated to be completed by June 2025, the in-service date was moved up to January 2025. In December 2024, the GL project was approved for \$169 million in funding with an in-service date of November 2025. Due to the impact of the project across TVA business units, we scheduled an evaluation of the GL Modernization project. The objective of this evaluation was to determine the causes for cost increases and schedule impacts on the GL Modernization project.

ⁱ Until August 2024, Technology and Innovation was part of Financial Services. They are currently under the Chief Administrative Officer organization.



Evaluation 2024-17485 – General Ledger Modernization

EXECUTIVE SUMMARY

What the OIG Found

We identified three primary causes of cost increases and schedule impacts on the GL Modernization project, including (1) inadequate identification of project requirements, (2) an incomplete project schedule, and (3) instances of ineffective contractor management.

- Detailed requirements were not identified early in the project. Instead, detailed requirements are being identified as the project progresses. Also, input from key stakeholders was not adequate as the project began. As a result, the GL project team did not understand the complexities and interdependencies of boundary systems and internal reporting needs were not included in the initial project scope.
- The GL project schedule was incomplete and did not include all the project's activities and associated resource needs, such as those related to boundary systems and internal reporting.
- TVA did not provide effective management of some contractors involved in the project, resulting in missed opportunities to address system integrator performance issues. In addition, TVA contracted for services that may not have provided value to the project. For example, TVA paid a contractor to negotiate savings with the system integrator but project cost increases make it difficult to determine if the savings were legitimate.

What the OIG Recommends

We recommend TVA management address issues that are still impacting the current GL project related to boundary systems, reporting, and finalizing a complete schedule. We also recommend future projects include key stakeholders early in the process in order to identify business units' needs and concerns and managing projects using a complete schedule. In addition, we recommend TVA management take steps to improve management of contractors. Detailed recommendations are contained in the body of the report.

TVA Management's Comments

TVA management agreed with the OIG recommendations and provided planned actions for the areas of project planning, project schedule development and management, and contractor performance management. In addition, TVA management stated a more detailed action plan will be provided at a later date. See Appendix B for TVA management's complete response.



Evaluation 2024-17485 – General Ledger Modernization

EXECUTIVE SUMMARY

Auditor's Response

We agree with TVA management's planned actions.

BACKGROUND

The Tennessee Valley Authority's (TVA) 5-year Enterprise Technology Plan seeks to transform the way TVA does business through technology and digital innovation. Digital Finance is one of seven efforts within this multi-year initiative, aimed at modernizing and streamlining TVA's financial systems and processes. Modernization of the general ledger (GL) is the first step within Digital Finance. The purpose of modernizing the GL was for "Financial Services to further increase its value to TVA" through finding "innovative ways to utilize modern technology and streamline the way financial capabilities are delivered." Desired outcomes for the GL modernization included (1) streamlining financial capabilities through automation, (2) building new skills to elevate Financial Services as a business partner, (3) enhancing career development opportunities through learning new ways of working, and (4) standardizing processes to increase efficiency and enhance customer service.

TVA's current GL has been used by TVA for approximately 16 years. During that time, TVA's business units have connected various boundary systems, which are applications, systems, or platforms outside of the GL that interface with the GL. Many of the boundary systems are considered foundational to TVA business processes. Examples of these include (1) TVA's supply chain and work management application, (2) a project asset suite covering a full range of project management and accounting requirements, and (3) TVA's human resource system. TVA also uses a business intelligence suite, which uses data from the GL and boundary systems for reporting purposes.

TVA's Standard Programs and Processes (SPP) 34.000, *Project Management*, states that project management includes planning for project deliverables, selection of a contracting strategy, and schedule and cost management. TVA projects have three phases: a study phase, design phase, and implementation phase. The study phase should include development of the project scope and procurement of contractors, as well as the general description of the work scope and preliminary cost estimates. The design phase should include the final design for the project, such as requirements and specifications. The implementation phase fully implements the project scope, completes project deliverables, and places the asset in service.

The objectives of the GL project include implementing a cloud-based enterprise financial management system with minimal customization, redefining and modernizing TVA's chart of accounts, and modernizing and optimizing boundary systems. The Financial Services strategic business unit is the project sponsor and is responsible for making project design decisions and leading organizational change management. TVA's Technology and Innovation (T&I)¹ Project Management Office is responsible for managing the project, as well as overseeing the project scope, schedule, budget, and communications with stakeholders. In

¹ Until August 2024, T&I was part of Financial Services. They are currently under the Chief Administrative Officer organization.

addition, TVA's Supply Chain is responsible for managing all commercial aspects of contracts such as negotiations of contract supplements, to drive additional value for TVA.

TVA executed a purchase order under an existing contract with a technology research and consulting firm to, among other things, (1) develop a request for proposal (RFP) for GL software and system implementation services, (2) evaluate proposals, and (3) make recommendations to TVA. In August 2022, TVA's Project Review Board (PRB)² approved the study phase of the GL modernization project, which included selection and negotiation for software and a system integrator (SI) responsible for designing and building the GL. The total estimated project cost was approximately \$67.1 million with an anticipated in-service date of June 2025. Based on the recommendation of the firm, TVA issued the RFP and requested that contractors combine the SI services proposal and software proposal into one submission for the purpose of evaluation and selection. The RFP included high level diagrams of the TVA financial system and details for interfaces with 19 boundary systems. During the GL project, TVA also executed purchase orders with the firm to negotiate contracts with the SI and for the software and to provide program assurance and oversight for three projects, including the GL, which were to be implemented simultaneously.

TVA received three proposals from prospective SIs. The SI selected proposed a 12-month timeline for the GL project to be in-service. Although the SI and software were bundled for evaluation and selection, TVA executed separate contracts, one with the SI in June 2023, and one with a government information technology solution firm to provide the selected software for the new GL. The SI's scope of work included (1) the prepare phase to launch the project; (2) the design phase, known within the GL project as the "Imagine" phase; (3) the deliver phase, which includes configuration, testing, and deploying the solution, and (4) the run phase where the system is used. During the same timeframe, TVA also chose this SI to implement a new Human Capital Management (HCM) system.³ When the SI was selected for both the GL and HCM projects, the SI adjusted their timeline to 17 months for both projects.

In November 2023, the T&I project manager went before the PRB to request approval for the design phase. The anticipated in-service date was moved up approximately six months from June 2025 to January 2025 and estimated total project costs increased to about \$104.7 million. In June 2024, TVA announced a delay in the implementation of the new GL system; however, a specific date was not announced. At the December 2024 PRB meeting, the project was approved for \$169 million with an in-service date of November 2025. See Appendix A for a summary of key dates in the GL modernization project. Due to the impact of the project across TVA business units, we scheduled an evaluation of the GL Modernization project.

² The PRB provides oversight for TVA projects and serves as a control for project authorization approvals.

³ The HCM project migrates the human resource system to a cloud-based solution.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of this evaluation was to determine the causes for cost increases and schedule impacts on the GL Modernization project. Our scope included all cost and schedule changes related to the project. To complete the evaluation, we:

- Reviewed TVA-SPP-34.000, *Project Management*, to gain an understanding of project management requirements related to cost, schedule, and scope.
- Conducted interviews with project sponsors, project personnel, and other affected stakeholders from various TVA business units to understand the GL project and causes for cost and schedule impacts to the project.
- Reviewed the Project Management Institute's Project Management Body of Knowledge and relevant guidance to understand project management principles related to cost and schedule management.
- Reviewed TVA's contracts, associated amendments, purchase orders, and statements of work with (1) the technology research and consulting firm, (2) the SI, (3) the government information technology solution firm providing the selected software for the new GL, and (4) various support contractors for boundary systems to identify contractually required deliverables, pricing structures, and other relevant terms and conditions.
- Reviewed GL Modernization project documentation related to cost, schedule, scope, and development of project risks.
- Reviewed a project review report performed by a third-party consultant.
- Reviewed PRB packages to examine the approval and justification for any requested cost and schedule changes.

This evaluation was conducted in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

FINDINGS AND RECOMMENDATIONS

The GL Modernization project has experienced increased costs and schedule delays. As previously described, the GL project cost has increased from an original estimated cost of \$67.1 million to its current estimated cost of \$169 million (a difference of approximately \$102 million) and the schedule has been delayed by 10 months. As discussed in detail below, we identified three primary causes of cost increases and schedule impacts on the GL Modernization project, including (1) inadequate identification of project requirements, (2) an incomplete project schedule, and (3) instances of ineffective contractor management.

INADEQUATE IDENTIFICATION OF PROJECT REQUIREMENTS

According to the Project Management Institute, inaccurate requirements gathering is the primary cause of project failure, with 47 percent of unsuccessful projects failing to meet goals due to poor requirements management. Key stakeholders outside of Financial Services were not involved in the GL project early enough to provide necessary input related to the GL's impacts on their systems and processes. The GL project team also did not identify detailed system requirements early in the process. Instead, detailed requirements are being identified as the project progresses. As a result, initial boundary system identification was incomplete and reporting needs of TVA business units were not fully understood.

A third-party review of the GL project provided to the PRB in November 2023 highlighted this risk, noting (1) TVA's documentation of requirements differed from the traditional project management approach, which could lead to significant underestimation of scope and project delays, (2) concerns that the planning phase did not adequately cover realistic and specific requirements, and (3) the lack of boundary system work posed a risk to the project's cost and schedule. However, no actions were recommended to address the concerns. As of December 2024, boundary systems were still being evaluated and requirements, data mapping, and specifications for reporting and analytics were still being developed, which could further impact cost and schedule.

Initial Boundary System Identification Was Incomplete

Early in the project, the GL project team created high-level boundary system diagrams, but did not map specific details of how boundary systems integrated with the existing GL before initiating the project's RFP, focusing instead on what the new GL software could do. In a document dated June 2024, almost two years after initial PRB approval, TVA stated boundary system information was largely based on assumptions as stakeholders for only one-third of the internal boundary systems had been contacted. As a result, neither TVA nor the SI understood the complexity and number of boundary systems and the GL project's impact on operational business processes and reporting. This is highlighted by the increase in boundary systems in scope for the project. The RFP included details for interfaces with 19 boundary systems. However, by December 2024, 47 boundary systems had been identified and an additional six systems or applications are currently being studied to determine whether they are in scope for the GL project. The additional boundary systems scope has resulted in over \$16 million in change requests.

Reporting Needs of Business Units Were Not Fully Understood

In addition to boundary systems, reporting impacts were also not identified timely. TVA's current reporting system will also be retired as part of the digital transformation. The system enables granular tracking of financial information at the project, outage, or asset level, which are needed by TVA business units. The new GL software provides only higher-level reporting, which does not meet the internal reporting needs of TVA business units for such things as new plant

construction, project financials, site-level reporting, and nuclear outage spend by activity. To meet the reporting needs of TVA business units, additional scope was added to the GL project in April 2024 for an enterprise data and analytics platform that will pull data from the new GL software and other existing TVA systems. In addition to the data and analytics platform, substantial changes to TVA's supply chain and work management application will be required to accommodate TVA business unit reporting needs for costs at a granular level. These changes could result in (1) new groups that do not currently use TVA's supply chain and work management application needing to use it, (2) the development of new processes and training of personnel, and (3) the potential need for additional full-time employees. A presentation to Operations management described how TVA's supply chain and work management application would need up to 2.3 million additional work orders annually to meet reporting needs. As of September 2024, reporting and analytics accounted for over \$11 million in change requests.

Recommendations

To address issues with the current project, we recommend the Vice President, Financial Operations and Performance, and the Director, T&I Portfolio Management, work with affected business units to identify all boundary system requirements and reporting needs prior to testing.

To ensure the success of future projects, we recommend the Vice President, Financial Operations and Performance, and the Director, T&I Portfolio Management, include key stakeholders early in the process in order to identify business units' needs and concerns.

TVA Management's Comments – TVA management agreed with the recommendations and stated that boundary systems have been identified and determinations have been made of required changes. For future projects, TVA management stated a more comprehensive stakeholder analysis will be performed. See Appendix B for TVA management's complete response.

Auditor's Response – We agree with TVA management's planned actions.

INCOMPLETE PROJECT SCHEDULE

According to TVA-SPP-34.000, *Project Management*, all TVA projects greater than \$250,000 require development and management of a schedule that represents the entirety of the project's scope.⁴ TVA is responsible for the schedule of the entire scope of the project, including the SI's scope of work. The quality and reliability of the schedule are fundamental to effectively managing and executing a project. As of August 2024, the GL project did not have a complete master schedule fully outlining all the project's activities and associated resource

⁴ TVA-SPP-34.000 was updated in May 2024 with schedule requirements applying to projects with cost over \$400,000.

needs, such as those related to boundary systems and internal reporting. A complete schedule is an essential tool that allows leaders to understand, evaluate, and plan the time needed to successfully complete a project and minimize risks. An updated schedule from November 2024 shows improvement but does not include details of all TVA resources needed to support the work.

Recommendations

To address issues with the current project, we recommend the Vice President, Financial Operations and Performance, and the Director, T&I Portfolio Management, develop and manage the GL project based on a complete schedule that includes all business units' resource needs.

To ensure the success of future projects, we recommend the Vice President, Financial Operations and Performance, and the Director, T&I Portfolio Management, manage projects using a complete schedule.

TVA Management's Comments – TVA management agreed with the recommendations and stated that a fully integrated schedule has been created and is reviewed and updated at least weekly. For future projects, TVA management stated a fully integrated schedule will be developed in accordance with standards appropriate for technology projects at various phases. See Appendix B for TVA management's complete response.

Auditor's Response – We agree with TVA management's planned actions.

CONTRACTOR MANAGEMENT

In addition to contracting with an SI and new GL software provider, TVA has executed purchase orders with other vendors to provide services on the project such as for boundary systems and oversight. TVA did not provide effective management of some contractors involved in the project, resulting in missed opportunities to address SI performance issues and contracting for services that may not have provided value to the project.

Missed Opportunities to Address SI Performance Issues

A March 2023 TVA presentation, "Digital Finance: General Ledger (GL) Modernization Project," provided to the GL executive sponsors, outlined risks with the selected SI. These included concerns with the aggressiveness of the proposed schedule based on the timeline related to boundary systems outside of Financial Services and challenges with changing TVA's current platform technology. The presentation outlined benchmarking data that indicated average project durations for the selected SI ranged from 2.5 years to 3.8 years, indicating the SI's proposed seventeen-month timeline was unachievable. In addition, a previous TVA project with the same SI had been unsuccessful. In 2019, TVA suspended an HCM project with the same SI after estimated project costs increased more than 200 percent and the schedule was delayed by over 2 years.

The SI was selected in spite of their past performance and the unrealistic schedule.

In March 2024, TVA's Supply Chain and T&I drafted a notification of work impact memo to the SI describing an anticipated 4-week project schedule delay and outlining TVA's concerns with the SI's (1) failure to fully staff the project, (2) quality issues with deliverables resulting in re-work, (3) over dependence on TVA resources, and (4) reluctance to align and integrate with TVA systems, processes, geography, and culture. The drafted letter outlined the SI's responsibility to notify TVA in writing of any modifications to the scope or approach to the work. The letter was never sent to the SI and TVA missed an opportunity to correct known performance issues. In October 2024, the GL project team and T&I personnel acknowledged that a 4-week delay from April 2024 had extended to an expected 9-month delay. Many of the causes for the 9-month delay mirror those from the unsent notification of work impact memo from March 2024. The GL project team and T&I personnel began negotiations with the SI on GL project costs.

TVA Contracted for Services That May Not Have Provided Value

TVA contracted for services that may not have provided value to TVA from (1) a technology research and consulting firm and (2) the SI. Specifically, TVA executed a purchase order under an existing contract with a technology research and consulting firm to negotiate contracts with the SI and for the software instead of using TVA's Supply Chain. The technology research and consulting firm would receive a 25 percent payout, of negotiated savings with the selected vendors. In September 2023, TVA approved a fee of approximately \$3.6 million based on the negotiated savings of \$14.5 million.⁵ However, as of September 2024, TVA has change requests from the SI for almost \$36 million and the software provider for nearly \$1.6 million. As a result, it is difficult to determine if the firm's involvement in the process resulted in any legitimate cost savings to TVA.

In addition to the contract work related to the RFP, TVA executed another purchase order under an existing contract with the technology research and consulting firm to provide program assurance and oversight for three projects, including the GL, which were to be implemented simultaneously. In May 2024, one project was in service and the other project was paused, however, even though two of the three projects were in service or paused, project documentation shows the firm continued working under the contract by providing another layer of project management for the GL. Several project management personnel interviewed indicated concerns with the firm, such as not understanding what role they were providing to the project or feeling as if the firm regurgitated team information already provided by the TVA project management team to the executive leadership. In September 2024, TVA terminated the firm's work for the GL project. Under this contract, TVA paid approximately \$582,000 for services that may not have provided value to the project.

⁵ Through December 2024, TVA paid approximately \$2.4 million in fee to the firm.

In the summer of 2024, TVA sent out a request to three contractors to provide program management governance of the GL project, one of which was the technology and research firm whose work was terminated in September 2024. All three of the contractors were already working on the GL project, posing potential conflicts of interest. The specific work scope was to “help guide the project, remove roadblocks, and provide assurance of favorability in the project’s direction based on scope, cost, and timeline.” TVA selected the existing SI contractor, essentially hiring them to oversee themselves. TVA signed a work release in September 2024 with the GL project SI. Subsequently, according to TVA, this scope of work is to be terminated due to lack of performance. As of December 2024, the date of termination had not been provided. Hiring a contractor to oversee themselves, does not provide effective oversight of the project and is not a prudent use of TVA funds.

Recommendation

We recommend the Vice President, Financial Operations and Performance, and the Director, T&I Portfolio Management, (1) hold contractors accountable for performance issues and (2) perform a lessons learned assessment on contractor use on the GL project and document corrective actions for future projects.

TVA Management’s Comments – TVA management agreed with the recommendations and stated they held conversations with contractors regarding performance issues that have occurred. In addition, upon completion of the go-live and hypercare period for the GL Modernization program, TVA management stated the team will facilitate lessons learned, inclusive of contractor management. See Appendix B for TVA management’s complete response.

Auditor’s Response – We agree with TVA management’s planned actions.

Summary of Key Dates in General Ledger Modernization Project

Date	Activity
August 2021	The Tennessee Valley Authority's (TVA) Board of Directors approved a capital project for the financial system modernization.
July 2022	TVA executed a purchase order under an existing contract with a technology research and consulting firm to assist with software and system integrator (SI) sourcing selection.
August 2022	The Project Review Board (PRB) approved the study phase of the project, with total forecasted cost of \$67.1 million and an in-service date of June 2025.
January 2023	TVA executed a purchase order under an existing contract with the technology research and consulting firm for negotiation of the SI and software contracts.
June 2023	TVA contracted with a SI for the General Ledger (GL) project.
July 2023	TVA entered into a contract with a government information technology solution firm to provide new GL software.
August 2023	TVA executed a purchase order under an existing contract with the technology research and consulting firm to provide program assurance and oversight work on three projects, including the GL.
October 2023	A third party reviewed the GL project and provided TVA with observations prior to the November 2023 PRB meeting.
November 2023	The PRB approved the design phase of the project with a total forecasted cost of \$104.7 million and an in-service date of January 2025.
March 2024	A notice of impact letter was prepared to send to the SI due to performance issues, but was not sent.
April 2024	The GL project sponsors approved a change order for an enterprise data and analytics platform.
June 20, 2024	The GL project team acknowledged that only one third of internal boundary systems owners have been contacted.
June 27, 2024	TVA announced a delay in the go-live date for the GL project. No specific date was provided.
September 2024	TVA executed a purchase order under the existing SI contract for program management on the GL project.
December 2024	The PRB approved the implementation phase of the project with total forecasted cost of \$169 million and an in-service date of November 2025.

March 14, 2025

David P. Wheeler, WT 2C-K

RESPONSE TO REQUEST FOR COMMENTS - DRAFT EVALUATION 2024-17485 –
GENERAL LEDGER MODERNIZATION

Our response to your January 29, 2025, request for comments regarding the subject draft report is attached.

TVA takes very seriously its commitment to be good stewards of resources. As such, TVA appreciates the Office of Inspector General helping us identify areas where we can improve our processes, and procedures. We are committed to a culture of continuous improvement at TVA and this is another opportunity for us to improve.

In response to this evaluation, TVA's planned actions will be coordinated with Supply Chain, Financial Operations and Performance, and Technology and Innovation. We have concluded from our review of the recommendations that there are opportunities for improvement in the following areas:

- Project planning.
- Project schedule development and management, and
- Contractor performance management

Additionally, a more detailed action plan will be forthcoming within the next sixty days.

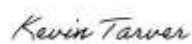
We would like to thank Jessica Monroe, Lisa Hammer, and you for the professionalism and cooperation in conducting this audit. If you have any questions, please contact Laura Campbell at (423) 751-2129, Rebecca Jones at (865) 632-7438, or Kevin Tarver at (423) 805-6774.



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Vice President
Supply Chain



Rebecca Jones
Vice President
Financial Operations
& Performance



Kevin Tarver
Director
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Attachment

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Jonathan Meadows
Jeannette Mills
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ATTACHMENT
RESPONSE TO REQUEST FOR COMMENTS
DRAFT EVALUATION 2024-17485 - GENERAL LEDGER MODERNIZATION
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OIG RECOMMENDATION	TVA PLANNED ACTIONS	TVA COMMENTS
To address issues with the current project, we recommend the Vice President, Financial Operations and Performance, and the Director, T&I Portfolio Management work with affected business units to identify all boundary system requirements and reporting needs prior to testing.	Boundary systems have been identified and determined whether change is required at this time. Testing begun in March 2025.	TVA Management agrees with this recommendation.
To ensure the success of future projects, we recommend the Vice President, Financial Operations and Performance, and the Director, T&I Portfolio Management include key stakeholders early in the process in order to identify business units' needs and concerns.	A more comprehensive stakeholder analysis will be performed on future projects.	TVA Management agrees with this recommendation.
To address issues with the current project, we recommend the Vice President, Financial Operations and Performance, and the Director, T&I Portfolio Management develop and manage the GL project based on a complete schedule that includes all business units' resource needs.	A fully integrated schedule has been created and is reviewed and updated at least weekly.	TVA Management agrees with this recommendation.
To ensure the success of future projects, we recommend the Vice President, Financial Operations and Performance, and the Director, T&I Portfolio Management manage projects using a complete schedule.	A fully integrated schedule will be developed on future projects in accordance with standards appropriate for technology projects at various phases.	TVA Management agrees with this recommendation.

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RESPONSE TO REQUEST FOR COMMENTS
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We recommend the Vice President, Financial Operations and Performance, and the Director, T&I Portfolio Management, (1) hold contractors accountable for performance issues and (2) perform a lessons learned assessment on contractor use on the GL project and document corrective actions for future projects.	Management has held conversations with contractors regarding any performance issues that have occurred. Upon completion of the go-live and hypercare period for the GL Modernization program, the team will facilitate lessons learned, inclusive of contractor management.	TVA Management agrees with this recommendation.
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