NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

February 23, 2011

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

Re: NERC Abbreviated Notice of Penalty regarding Gainesville Regional Utilities, FERC Docket No. NP11-__-000

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Abbreviated Notice of Penalty (NOP) regarding Gainesville Regional Utilities (GRU), with information and details regarding the nature and resolution of the violation[1] discussed in detail in the Settlement Agreement (Attachment a) and the Disposition Documents attached thereto, in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations and orders, as well as NERC Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).[2]

This NOP is being filed with the Commission because Florida Reliability Coordinating Council, Inc. (FRCC) and GRU have entered into a Settlement Agreement to resolve all outstanding issues arising from FRCC's determination and findings of the enforceable violations of PRC-004-1 Requirement (R) 2, PRC-004-1 R1, PRC-005-1 R2/2.1, PRC-005-1 R1, PRC-005-1 R2/2.1, PRC-008-0 R2 and BAL-005-0.1b.[3] According to the Settlement Agreement, GRU

[1] For purposes of this document, each violation at issue is described as a "violation," regardless of its procedural posture and whether it was a possible, alleged or confirmed violation.

[2] *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards* (Order No. 672), III FERC Stats. & Regs. ¶ 31,204 (2006); *Notice of New Docket Prefix "NP" for Notices of Penalty Filed by the North American Electric Reliability Corporation*, Docket No. RM05-30-000 (February 7, 2008). *See also* 18 C.F.R. Part 39 (2010). *Mandatory Reliability Standards for the Bulk-Power System*, FERC Stats. & Regs. ¶ 31,242 (2007) (Order No. 693), *reh'g denied*, 120 FERC ¶ 61,053 (2007) (Order No. 693-A). *See* 18 C.F.R § 39.7(c)(2).

[3] BAL-005-0 was enforceable from June 18, 2007 through August 27, 2008. BAL-005-0b was approved by the Commission and became enforceable on August 28, 2008. BAL-005-0.1b is the current enforceable Standard as of May 13, 2009. The subsequent interpretations provide clarity regarding the responsibilities of a registered entity and do not change the meaning or language of the original NERC Reliability Standard and its requirements. For

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neither admits nor denies the violations, but has agreed to the assessed penalty of forty five thousand dollars ($45,000), in addition to other remedies and actions to mitigate the instant violations and facilitate future compliance under the terms and conditions of the Settlement Agreement. Accordingly, the violations identified as NERC Violation Tracking Identification Numbers FRCC200900164, FRCC200900165, FRCC200900166, FRCC200900167, FRCC200900174, FRCC200900309 and FRCC201000392 are being filed in accordance with the NERC Rules of Procedure and the CMEP.

Statement of Findings Underlying the Violations

This NOP incorporates the findings and justifications set forth in the Settlement Agreement executed on December 16, 2010, by and between FRCC and GRU. The details of the findings and the basis for the penalty are set forth in the Disposition Documents. This NOP filing contains the basis for approval of the Settlement Agreement by the NERC Board of Trustees Compliance Committee (NERC BOTCC). In accordance with Section 39.7 of the Commission's regulations, 18 C.F.R. § 39.7, NERC provides the following summary table identifying each violation of a Reliability Standard resolved by the Settlement Agreement, as discussed in greater detail below.

NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Duration	Total Penalty ($)
NOC-208	FRCC200900164	PRC-004-1	2	High	8/22/08-6/17/09	45,000
	FRCC200900165	PRC-004-1	1	High	6/13/08-6/17/09	
	FRCC200900166	PRC-005-1	2/2.1	High[4]	6/18/07-11/30/08	
	FRCC200900167	PRC-005-1	1	High[5]	6/18/07-7/1/09	
	FRCC200900174	PRC-005-1	2/2.1	High[6]	3/2/08-6/22/08	
	FRCC200900309	PRC-008-0	2	Medium	3/1/09-5/18/09	

consistency in this filing, the current version of the NERC Reliability Standard effective for the duration of the violation, BAL-005-0.1b, is used throughout.

[4] PRC-005-1 R2 has a "Lower" Violation Risk Factor (VRF); R2.1 and R2.2 each have a "High" VRF. During a final review of the standards subsequent to the March 23, 2007 filing of the Version 1 VRFs, NERC identified that some standards requirements were missing VRFs; one of these include PRC-005-1 R2.1. On May 4, 2007, NERC assigned PRC-005 R2.1 a "High" VRF. In the Commission's June 26, 2007 Order on Violation Risk Factors, the Commission approved the PRC-005-1 R2.1 "High" VRF as filed. Therefore, the "High" VRF was in effect from June 26, 2007. In the context of this case, FRCC determined that the violation related to R2.1and therefore a "High" VRF is appropriate.

[5] When NERC filed VRFs for PRC-005-1, NERC originally assigned a "Medium" VRF to PRC-005-1 R1. In the Commission's May 18, 2007 Order on Violation Risk Factors, the Commission approved the VRF as filed but directed modifications. On June 1, 2007, NERC filed a modified "High" VRF for PRC-005 R1 for approval. On August 9, 2007, the Commission issued an Order approving the modified VRF. Therefore, the "Medium" VRF was in effect from June 18, 2007 until August 9, 2007 and the "High" VRF has been in effect since August 9, 2007. In the context of this case, FRCC determined that the violation related to both R1.1 and R1.2.

[6] *See* n.4 *supra*.

NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Duration	Total Penalty ($)
	FRCC201000392	BAL-005-0.1b	11	Medium	6/20/09-1/28/10	

The text of the Reliability Standards at issue and further information on the subject violations are set forth in the Disposition Documents.

PRC-004-1 R2 (FRCC200900164) - OVERVIEW
This violation was discovered during a Compliance Audit that was conducted from April 20, 2009 through April 24, 2009. FRCC determined that GRU, as a Generator Owner, failed to provide evidence to demonstrate it had developed and implemented a Corrective Action Plan to avoid future misoperations of a similar nature for a misoperation that occurred on August 22, 2008.

PRC-004-1 R1 (FRCC200900165) - OVERVIEW
This violation was discovered during a Compliance Audit that was conducted from April 20, 2009 through April 24, 2009. FRCC determined that GRU, as a Transmission Owner, failed to demonstrate that it had developed and implemented a Corrective Action Plan to avoid future misoperations of a similar nature for a misoperation which occurred on June 13, 2008.

PRC-005-1 R2/2.1 (FRCC200900166) - OVERVIEW
This violation was discovered during a Compliance Audit that was conducted from April 20, 2009 through April 24, 2009. FRCC determined that GRU, as a Generator Owner and Transmission Owner, did not provide evidence that ten of the Protection System devices[7] were maintained and tested within the defined intervals.

PRC-005-1 R1 (FRCC200900167) - OVERVIEW
This violation was discovered during a Compliance Audit that was conducted from April 20, 2009 through April 24, 2009. FRCC determined that GRU, as a Generator Owner and Transmission Owner, could not provide documents sufficient to demonstrate that the Protection System maintenance and testing program for Protection Systems that affects the bulk power system (BPS) included an interval for the maintenance and testing of associated communication systems, DC control circuitry, station batteries and voltage and current sensing devices, as required by R1.1. In addition, FRCC determined that GRU could not provide documents sufficient to demonstrate that the Protection System maintenance and testing program included a summary of maintenance and testing procedures for associated communication systems, DC control circuitry, transmission station batteries and voltage and current sensing devices, as required by R1.2.

[7] *The NERC Glossary of Terms Used in Reliability Standards* defines Protection System as "Protective relays, associated communication systems, voltage and current sensing devices, station batteries and DC control circuitry."

PRC-005-1 R2/2.1 (FRCC200900174) - OVERVIEW
GRU submitted a Self-Report for this violation on April 8, 2009. FRCC determined that GRU, as a Transmission Owner, had one transmission relay that was found to be out of test interval from March 2, 2008 to June 23, 2008.

PRC-008-0 R2 (FRCC200900309) - OVERVIEW
GRU submitted a Self-Report for this violation on June 4, 2009. FRCC determined that GRU, as a Transmission Owner and Distribution Provider, had one underfrequency relay that was not tested within its prescribed six-year interval.

BAL-005-0.1b R11 (FRCC201000392) - OVERVIEW[8]
The violation was discovered during an FRCC Spot Check on September 2, 2010. FRCC determined that GRU, as a Balancing Authority, used a default ramp rate which did not accurately include the effects of ramp rate in its Schedule Interchange value to calculate Area Control Error (ACE) and which were not the same ramp rate the other party to the Interchange Transaction Tags used.

Statement Describing the Assessed Penalty, Sanction or Enforcement Action Imposed[9]

Basis for Determination

Taking into consideration the Commission's direction in Order No. 693, the NERC Sanction Guidelines, the Commission's July 3, 2008, October 26, 2009 and August 27, 2010 Guidance Orders,[10] the NERC BOTCC reviewed the Settlement Agreement and supporting documentation on December 10, 2010. The NERC BOTCC approved the Settlement Agreement, including FRCC's assessment of a forty five thousand dollar ($45,000) financial penalty against GRU and other actions to facilitate future compliance required under the terms and conditions of the Settlement Agreement. In approving the Settlement Agreement, the NERC BOTCC reviewed the applicable requirements of the Commission-approved Reliability Standards and the underlying facts and circumstances of the violations at issue.

In reaching this determination, the NERC BOTCC considered the following factors:

1. the violations constituted GRU's first occurrence of violations of the subject NERC Reliability Standards, with the exception of the repeat violation of PRC-005-1 R2 (FRCC200900174);
2. FRCC considered GRU's repeat violation of PRC-005-1 R2 an aggravating factor;
3. GRU self-reported two of the violations;

[8] On September 28, 2009, GRU self-reported INT-007-1 R1 (FRCC200900258) which was ultimately dismissed on August 18, 2010 and replaced with BAL-005-0.1b R11 (FRCC201000392) at the completion of FRCC's Spot Check (FRCC determined BAL-005-0.1b was the more appropriate Standard and Requirement relevant to the violation).
[9] *See* 18 C.F.R. § 39.7(d)(4).
[10] *North American Electric Reliability Corporation*, "Guidance Order on Reliability Notices of Penalty," 124 FERC ¶ 61,015 (2008); *North American Electric Reliability Corporation*, "Further Guidance Order on Reliability Notices of Penalty," 129 FERC ¶ 61,069 (2009); *North American Electric Reliability Corporation*, "Notice of No Further Review and Guidance Order," 132 FERC ¶ 61,182 (2010).

4. FRCC reported that GRU was cooperative throughout the compliance enforcement process;
5. Although GRU did not have a fully documented compliance program at the time of the violations which was considered a neutral factor in the penalty determination, GRU is committed to improving its compliance program which FRCC considered a mitigating factor, as discussed in the Settlement Agreement;
6. there was no evidence of any attempt to conceal a violation nor evidence of intent to do so;
7. FRCC determined that the violations did not pose a serious or substantial risk to the reliability of the bulk power system (BPS), as discussed in the Disposition Documents; and
8. FRCC reported that there were no other mitigating or aggravating factors or extenuating circumstances that would affect the assessed penalty.

For the foregoing reasons, the NERC BOTCC approves the Settlement Agreement and believes that the assessed penalty of forty five thousand dollars ($45,000) is appropriate for the violations and circumstances at issue, and is consistent with NERC's goal to promote and ensure reliability of the BPS.

Pursuant to 18 C.F.R. § 39.7(e), the penalty will be effective upon expiration of the 30 day period following the filing of this NOP with FERC, or, if FERC decides to review the penalty, upon final determination by FERC.

Attachments to be included as Part of this Notice of Penalty

The attachments to be included as parts of this NOP are the following documents:

a) Settlement Agreement by and between FRCC and GRU executed December 16, 2010, included as Attachment a;
    i. Disposition Document for Common Information, included as Attachment A to the Settlement Agreement;
    ii. Disposition Document for PRC-004-1 R2 (FRCC200900164), included as Attachment B to the Settlement Agreement;
    iii. Disposition Document for PRC-004-1 R1 (FRCC200900165), included as Attachment C to the Settlement Agreement;
    iv. Disposition Document for PRC-005-1 R2/2.1 (FRCC200900166) and PRC-005-1 R1 (FRCC200900167), included as Attachment D to the Settlement Agreement;
    v. Disposition Document for PRC-005-1 R2/2.1 (FRCC200900174), included as Attachment E to the Settlement Agreement;
    vi. Disposition Document for PRC-008-0 R2 (FRCC200900309), included as Attachment F to the Settlement Agreement; and

vii. Disposition Document for BAL-005-0.1b R11 (FRCC201000392), included as Attachment G to the Settlement Agreement.

b) Record Documents for PRC-004-1 R2 (FRCC200900164) and PRC-004-1 R1 (FRCC200900165) included as Attachment b:

i. FRCC's Source Document Information dated September 28, 2010, included as Attachment b-1;

ii. GRU's Mitigation Plan MIT-08-2115 submitted May 22, 2009, included as Attachment b-2;

iii. GRU's Certification of Mitigation Plan Completion dated June 18, 2009, included as Attachment b-3; and

iv. FRCC's Verification of Mitigation Plan Completion dated October 8, 2009, included as Attachment b-4.

c) Record Documents for PRC-005-1 R2/2.1 (FRCC200900166) and PRC-005-1 R1 (FRCC200900167) included as Attachment c:

i. FRCC's Source Document Information dated December 3, 2010, included as Attachment c-1;

ii. GRU's Mitigation Plan MIT-07-2590 submitted May 28, 2009, included as Attachmentc-2;

iii. GRU's Certification of Mitigation Plan Completion dated February 26, 2010 and submitted May 28, 2010, included as Attachment c-3; and[11]

iv. FRCC's Verification of Mitigation Plan Completion dated June 7, 2010, included as Attachment c-4.

d) Record Documents for PRC-005-1 R2/2.1 (FRCC200900174) included as Attachment e:

i. GRU's Self-Report dated April 8, 2009, included as Attachment d-1;

ii. GRU's Mitigation Plan MIT-09-1727 submitted May 7, 2009, included as Attachment d-2;[12]

iii. GRU's Certification of Mitigation Plan Completion dated May 7, 2009, included as Attachment d-3; and

iv. FRCC's Verification of Mitigation Plan Completion dated May 27, 2009, included as Attachment d-4.

e) Record Documents for PRC-008-0 R2 (FRCC200900309) included as Attachment e:

[11] The Certification document is dated February 25, 2010 with a signature date of February 26, 2010. This form was revised and resubmitted to FRCC on May 28, 2010.

[12] In a letter dated May 1, 2009, FRCC requested GRU revise its Mitigation Plan dated April 8, 2009 because the "descriptor of the reported relay is incorrect. It does not match the descriptor used in GRU's Protection System Testing and Maintenance Program. Also the dates do not match the dates presented in GRU's Protection System and Maintenance program." GRU then submitted a revised Mitigation Plan dated May 7, 2009 correcting the issue. GRU also resubmitted an accompanying revised Certification of Mitigation Plan Completion on May 7, 2009.

i. GRU's undated Self-Report submitted June 4, 2009, included as Attachment e-1;

ii. GRU's Mitigation Plan MIT-09-2323 submitted June 4, 2009, included as Attachment e-2;

iii. GRU's Certification of Mitigation Plan Completion dated June 4, 2009, included as Attachment e-3; and

iv. FRCC's Verification of Mitigation Plan Completion dated February 3, 2010, included as Attachment e-4.

f) Record Documents for BAL-005-0.1b R11 (FRCC201000392) included as Attachment f:

i. FRCC's Source Document Information dated September 23, 2010, included as Attachment f-1;

ii. GRU's Mitigation Plan MIT-07-2846 submitted September 9, 2010, included as Attachment f-2;

iii. GRU's Certification of Mitigation Plan Completion dated September 9, 2010, included as Attachment f-3; and

iv. FRCC's Verification of Mitigation Plan Completion dated October 20, 2010, included as Attachment f-4.

A Form of Notice Suitable for Publication[13]

A copy of a notice suitable for publication is included in Attachment g.

[13] *See* 18 C.F.R. § 39.7(d)(6).

Notices and Communications

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

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*Persons to be included on the Commission's service list are indicated with an asterisk. NERC requests waiver of the Commission's rules and regulations to permit the inclusion of more than two people on the service list.

Conclusion

Accordingly, NERC respectfully requests that the Commission accept this Abbreviated NOP as compliant with its rules, regulations and orders.

Respectfully submitted,

/s/ *Rebecca J. Michael*

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cc: Gainesville Regional Utilities
Florida Reliability Coordinating Council, Inc.

Attachments

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment a

Settlement Agreement by and between FRCC and GRU executed December 16, 2010

FRCC
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SETTLEMENT AGREEMENT
OF
FLORIDA RELIABILITY COORDINATING COUNCIL, INC.
AND
GAINESVILLE REGIONAL UTILITIES

NERC Registry ID #: NCR00032

I. Introduction

1. Florida Reliability Coordinating Council, Inc. ("FRCC") and Gainesville Regional Utilities ("GRU") enter into this Settlement Agreement ("Agreement") to resolve all outstanding issues arising from a preliminary and non-public assessment resulting in FRCC determination and findings, pursuant to the North American Electric Reliability Corporation ("NERC") Rules of Procedure, of seven violations by GRU of the following NERC Reliability Standards and Requirement:

   i. PRC-004-1, Requirement 2 [NERC Tracking #: FRCC200900164]
   ii. PRC-004-1, Requirement 1 [NERC Tracking #: FRCC200900165]
   iii. PRC-005-1, Requirement 2 [NERC Tracking #: FRCC200900166]
   iv. PRC-005-1, Requirement 1 [NERC Tracking #: FRCC200900167]
   v. PRC-005-1, Requirement 2 [NERC Tracking #: FRCC200900174]
   vi. PRC-008-0, Requirement 2 [NERC Tracking #: FRCC200900309]
   vii. BAL-005-0.1b, Requirement 11 [NERC Tracking #: FRCC201000392]

2. Pursuant to the Settlement Agreement, GRU neither admits nor denies the violations of PRC-004-1, R2 (FRCC200910164), PRC-004-1, R1 (FRCC200900165), PRC-005-1, R2 (FRCC200900166), PRC-005-1, R1 (FRCC200900167), PRC-005-1, R2 (FRCC200900174), PRC-008-0, R2 (FRCC200900309) , BAL-005-0.1b, R11 (FRCC201000392), but, GRU has agreed to the proposed penalty of forty five thousand dollars ($45,000) to be

assessed to GRU, in addition to other remedies and mitigation actions to mitigate the instant violation[1] and ensure future compliance under the terms and conditions of the Settlement Agreement.

II. Stipulation

3. The facts stipulated herein are stipulated solely for the purpose of resolving between GRU and FRCC, the matters discussed herein and do not constitute stipulations or admissions for any other purpose, including in any administrative proceeding. GRU and FRCC hereby stipulate and agree to the following:

A. Background

4. See Section I of the Disposition document (Attachment A) for a description of GRU.

B. Violation

5. See Section II of the Disposition document (Attachment B, C, D, E, F, and G) for the description of the violation.

III. PARTIES' SEPARATE REPRESENTATIONS

Statement of FRCC

6. Regarding the violation of PRC-004-1, R2 (FRCC200900164)

   i. FRCC Compliance Staff found that GRU failed to provide evidence to demonstrate it had developed and implemented a Corrective Action Plan to avoid future Misoperations of a similar nature for a misoperation that occurred on 8/22/08. FRCC Compliance Staff issued an Initial Notice of Alleged Violation on May 11, 2009. GRU requested settlement discussions regarding the violation prior to a Notice of Alleged Violation being issued.

   ii. *Impact on the Bulk Power System:* The FRCC Enforcement Compliance Staff concluded the impact of the violation of R2 to be a violation that did not constitute a serious or substantial risk to the bulk power system as discussed in the Disposition – 'Attachment B' document.

[1] For purposes of this document and attachments hereto, each violation at issue is described as a "violation," regardless of its procedural posture and whether it was a possible, alleged or confirmed violation.

7. Regarding the violation of PRC-004-1, R1 (FRCC200900165)

   iii. FRCC Compliance Staff found that GRU failed to provide evidence to demonstrate the Corrective Action Plan it had developed and implemented for a misoperation that occurred on 6/13/08 failed to address the avoidance of future Misoperations of a similar nature. FRCC Compliance Staff issued an Initial Notice of Alleged Violation on May 11, 2009. GRU requested settlement discussions regarding the violation prior to a Notice of Alleged Violation being issued.

   iv. *Impact on the Bulk Power System:* The FRCC Enforcement Compliance Staff concluded the impact of the violation of R2 to be a violation that did not constitute a serious or substantial risk to the bulk power system as discussed in the Disposition – 'Attachment C' document.

8. Regarding the violation of PRC-005-1, R1 (FRCC200900167)

   FRCC Compliance Staff found that GRU failed to demonstrate that the Protection System maintenance and testing program for Protection Systems that affect the BES included an interval for the maintenance and testing of associated communication systems, DC control circuitry, and voltage and current sensing devices from June 18, 2007 until July 30, 2008. Also, the documents provided were insufficient to demonstrate that the Protection System maintenance and testing program for Protection System that affects the Bulk Electric System included an interval for the maintenance and testing of transmission station batteries from June 18, 2007 until September 11, 2008.

   In addition, the documents provided were insufficient to demonstrate that the Protection System maintenance and testing program for Protection System that affects the Bulk Electric System included a summary of maintenance and testing procedures for associated communication systems, DC control circuitry, and voltage and current sensing devices from June 18, 2007 until July 30, 2008. Also the document provided was insufficient to demonstrate that the Protection System maintenance and testing program for Protection System that affects the Bulk Electric System included a summary of maintenance and testing procedures for associated communication systems and voltage and current sensing devices from March 1, 2009. Also the documents provided were insufficient to demonstrate Protection System maintenance and testing program for Protection System that affects the Bulk Electric System included a summary of maintenance and testing procedures for transmission station batteries from June 18, 2007 until August 7, 2008. FRCC Compliance Staff issued an Initial Notice of Alleged Violation on

May 11, 2009. GRU requested settlement discussions regarding the violation prior to a Notice of Alleged Violation being issued.

v. *Impact on the Bulk Power System:* The FRCC Enforcement Compliance Staff concluded the impact of the violation of R1 to be a violation that did not constitute a serious or substantial risk to the bulk power system as discussed in the Disposition – 'Attachment D' document.

9. Regarding the violation of PRC-005-1, R2 (FRCC200900166)

FRCC Compliance Staff found that GRU failed to provide evidence that ten of the Protection System devices were maintained and tested within the defined intervals. FRCC Compliance Staff issued an Initial Notice of Alleged Violation on May 11, 2009. GRU requested settlement discussions regarding the violation prior to a Notice of Alleged Violation being issued.

i. Impact on the Bulk Power System: The FRCC Enforcement Compliance Staff concluded the impact of the violation of R2 to be a violation that did not constitute a serious or substantial risk to the bulk power system as discussed in the Disposition – 'Attachment D' document.

10. Regarding the violation of PRC-005-1, R2 (FRCC200900174)

FRCC Compliance Staff found that GRU had one transmission relay that was found to be out of test interval from 3/2/08 to 6/23/08. FRCC Compliance Staff issued an Initial Notice of Alleged Violation on May 26, 2009. GRU requested settlement discussions regarding the violation prior to a Notice of Alleged Violation being issued.

i. Impact on the Bulk Power System: The FRCC Enforcement Compliance Staff concluded the impact of the violation of R2 to be a violation that did not constitute a serious or substantial risk to the bulk power system as discussed in the Disposition – 'Attachment E' document.

11. Regarding the violation of PRC-008-0, R2 (FRCC200900309)

FRCC Compliance Staff found that GRU had one underfrequency relay that was found to be out of test interval from 3/1/09 to 5/19/09. FRCC Compliance Staff issued an Initial Notice of Alleged Violation on February 2, 2010. GRU requested settlement discussions regarding the violation prior to a Notice of Alleged Violation being issued.

i. Impact on the Bulk Power System: The FRCC Enforcement Compliance Staff concluded the impact of the violation of R2 to be a violation that did

not constitute a serious or substantial risk to the bulk power system as discussed in the Disposition – 'Attachment F' document.

12. Regarding the violation of BAL-005-0.1b, R11 (FRCC201000392)

    FRCC Compliance Staff found that there were three GRU Interchange Transaction Tags between 6/20/09 and 8/21/09. FRCC Compliance Staff issued an Initial Notice of Alleged Violation on May 26, 2009. GRU requested settlement discussions regarding the violation prior to a Notice of Alleged Violation being issued.

    i. *Impact on the Bulk Power System:* The FRCC Enforcement Compliance Staff concluded the impact of the violation of R2 to be a violation that did not constitute a serious or substantial risk to the bulk power system as discussed in the Disposition – 'Attachment G' document.

13. FRCC agrees this Agreement is in the best interest of the parties, FRCC and GRU, and in the best interest of bulk power system reliability.

Statement of GAINESVILLE REGIONAL UTILITIES

14. GRU neither admits nor denies the facts set forth and agreed to by the parties for purposes of this Agreement as it constitutes to the violation of PRC-004-1, R2 (FRCC200910164), PRC-004-1, R1 (FRCC200900165), PRC-005-1, R2 (FRCC200900166), PRC-005-1, R1 (FRCC200900167), PRC-005-1, R2 (FRCC200900174), PRC-008-0, R2 (FRCC200900309) , BAL-005-0.1b, R11 (FRCC201000392).

15. GRU has agreed to enter into this Settlement Agreement with FRCC to avoid extended litigation with respect to the matters described or referred to herein, to avoid uncertainty, and to effectuate a complete and final resolution of the issues set forth herein. GRU agrees that this agreement is in the best interest of the parties and in the best interest of maintaining a reliable electric infrastructure.

IV. MITIGATING ACTIONS, REMEDIES AND SANCTIONS

10. FRCC and GRU agree that GRU has completed and FRCC has verified completion of the mitigation actions set forth in Section IV of the Disposition document (Attachment A).

11. FRCC Staff also considered the specific facts and circumstances of the violation and GRU actions in response to the violation in determining a proposed penalty that meets the requirement in Section 215 of the Federal Power Act that "[a]ny penalty imposed under this section shall bear a reasonable relation to the seriousness of the violation and shall take into consideration the efforts of [GRU]

to remedy the violation in a timely manner." The factors considered by FRCC Staff in the determination of the appropriate penalty are set forth in Section V of the Disposition document (Attachment A).

12. In addition to the actions taken by GRU as detailed in the Mitigation Plans, GRU has agreed to undertake the following additional actions:

    GRU is to implement Internal Compliance Program (ICP) improvements including:

    a. Fully document the ICP, and have it reviewed, signed and approved by an Authorized Entity Officer or equivalent

    b. Training on and dissemination of the ICP to all of its employees specified in the ICP

    c. The ICP oversight position will be supervised at a high level within the organization

    d. The ICP oversight position will have independent access to the GRU Board/ General Manager and/or its Board of Directors

    e. The ICP will be managed and operated fully independent of the work groups that are responsible for complying with Reliability Standards to the extent possible

    f. The ICP will include internal self auditing for compliance on an annual basis for full compliance with all Reliability Standards applicable to the entity

    g. The ICP will include a formal review on a semi-annual[2] or shorter cycle

    h. The ICP will include disciplinary actions for employees involved in Reliability Standards violations

    GRU's plan for implementing its committed changes to the ICP is as described in the table below:

Milestone Activity	Completion Date
GRU to commence draft ICP document	October 1, 2010

[2] Semi-annual is to be interpreted as a minimum of every six months.

GRU to submit a draft ICP document to FRCC Compliance Staff for review and comment.	December 1, 2010
GRU to incorporate suggested changes (if any) to GRU's Compliance Program document. GRU to finalize the Compliance Program document.	January 1, 2011
GRU to implement the program including dissemination to employees and completion of employee training.	March 1, 2011
GRU to provide FRCC the final GRU Board/General Manager approved and signed Compliance Program document and evidence of program implementation, dissemination to employees and training.	April 1, 2011

13. The proposed penalty takes into consideration that GRU commits to implement a strong Internal Compliance Program that addresses compliance with applicable NERC Reliability Standards (as listed above). The program will define (1) the role of senior management in fostering compliance; (2) effective preventive measures to ensure compliance; (3) prompt detection, cessation, and reporting of violations; and (4) remediation efforts. GRU has committed to aggressively adopting, fostering and maintaining an effective corporate culture of compliance and put into place rigorous procedures and processes that provide effective accountability for compliance.

14. GRU will provide status updates as shown in the table above, or if requested by FRCC, more frequently. GRU will submit these status updates to FRCC in accordance with the confidentiality provisions of Section 1500 of the NERC Rules of Procedure.

15. FRCC Compliance Staff shall verify the progress and completion of the terms of this agreement, and FRCC may take the following actions including, but not limited to site inspections, interviews, and requests for other documents to validate progress and/or completion of the mitigation plans and any other terms and remedies of this Settlement Agreement. FRCC shall reasonably coordinate audits and information requests with GRU related to this Settlement Agreement.

16. Based on the above factors, as well as the mitigation actions and preventative measures taken, GRU shall pay a monetary penalty for the violation of PRC-004-1, R2 (FRCC200910164), PRC-004-1, R1 (FRCC200900165), PRC-005-1, R2 (FRCC200900166), PRC-005-1, R1 (FRCC200900167), PRC-005-1, R2 (FRCC200900174), PRC-008-0, R2 (FRCC200900309) , BAL-005-0.1b, R11 (FRCC201000392), of **$45,000** (forty five thousand dollars). FRCC shall present an invoice to GRU within twenty days after the Agreement is either approved by FERC or by operation of law. Payment shall be due from GRU to

the FRCC within 30 days following the date[3] of the invoice. FRCC shall notify the North American Electric Reliability Corporation if the payment is not received.

17. Failure to make a timely penalty payment or to comply with any of the terms and conditions agreed to herein, or any other conditions of this Settlement Agreement, shall be deemed to be either the same violation that initiated this Settlement and/or additional violation(s) and may subject GRU to new or additional enforcement, penalty or sanction actions in accordance with the NERC Rules of Procedure.

18. If GRU does not make the monetary penalty payment above by the date as specified, interest payable to FRCC will begin to accrue pursuant to FERC's regulations at 18 C.F.R. § 35.19(a)(2)(iii) from the date that payment is due, in addition to the penalty specified above.

V. ADDITIONAL TERMS

19. The signatories to the Agreement agree that they enter into the Agreement voluntarily and that, other than the recitations set forth herein, no tender, offer or promise of any kind by any member, employee, officer, director, agent or representative of FRCC or GRU has been made to induce the signatories or any other party to enter into the Agreement. The signatories agree that the terms and conditions of the Settlement Agreement are consistent with Commission's regulations and orders, and NERC's Rules of Procedure.

20. FRCC shall report the terms of all settlements of compliance matters to NERC. NERC will review the settlement for the purpose of evaluating its consistency with other settlements entered into for similar violations or under other, similar circumstances. Based on this review, NERC will either approve the settlement or reject the settlement and notify the FRCC and GRU of changes to the settlement that would result in approval. If NERC rejects the settlement, NERC will provide specific written reasons for such rejection and the FRCC will attempt to negotiate a revised settlement agreement with GRU including any changes to the settlement specified by NERC. If a settlement cannot be reached, the enforcement process shall continue to conclusion. If NERC approves the settlement, NERC will (i) report the approved settlement to FERC for the FERC's review and approval by order or operation of law and (ii) publicly post the violation and the terms provided for in the settlement.

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[3] Due from the date of the invoice mailing from the FRCC to the Registered Entity (using the U.S. Post Office post mark on the Certified Mail receipt).

21. This Agreement shall become effective upon FERC's approval of the Agreement by order or operation of law as submitted to it or upon FERC's approval of the Agreement by order or operation of law as modified in a manner acceptable to the parties.

22. GRU agrees that this Agreement, when approved by NERC and FERC, shall represent a final settlement of all matters set forth herein and GRU waives its right to further hearings and appeal, unless and only to the extent that GRU contends that any NERC or FERC action on the Agreement contains one or more material modifications to the Agreement.

23. FRCC reserves all rights to initiate enforcement, penalty or sanction actions against GRU in accordance with the NERC Rules of Procedure in the event that GRU fails to comply with the mitigation plan and compliance program agreed to in this Agreement. In the event GRU fails to comply with any of the terms, mitigating actions, remedies and sanctions, as set forth in this Agreement, in which event FRCC may initiate enforcement, penalty, or sanction actions against GRU to the maximum extent allowed by the NERC Rules of Procedure, up to the maximum statutorily allowed penalty. GRU shall retain all rights to defend against such enforcement actions, also according to the NERC Rules of Procedure.

24. GRU consents to the use of FRCC's determinations, findings, and conclusions set forth in this Agreement for the purpose of assessing the factors including the factor of determining the company's history of violations, in accordance with the NERC Sanction Guidelines and applicable FERC orders and policy statements. Such use may be in an enforcement action or compliance proceeding undertaken by NERC and/or any Regional Entity; provided however, that GRU does not consent to the use of the specific acts set forth in this Agreement as the sole basis for any other action or proceeding brought by NERC and/or FRCC, nor does GRU consent to the use of this Agreement by any other party in any other action or proceeding.

25. Each of the undersigned warrants that he or she is an authorized representative of the entity designated, is authorized to bind such entity and accepts the Agreement on the entity's behalf.

26. The undersigned representative of each party affirms that he or she has read the Agreement, that all of the matters set forth in the Agreement are true and correct to the best of his or her knowledge, information and belief, and that he or she understands that the Agreement is entered into by such party in express reliance on those representations, provided, however, that such affirmation by each party's representative shall not apply to the other party's statements of position set forth in Section III of this Agreement.

27. This Agreement may be executed in counterparts, each of which so executed shall be deemed to be an original.

Agreed to and accepted:

Linda D Campbell

Linda D. Campbell
VP and Executive Director Standards & Compliance
Florida Reliability Coordinating Council, Inc.

12/16/10
Date

Robert E. Hunzinger
General Manager for Utilities
Gainesville Regional Utilities

12/10/2010.
Date

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Disposition Document for Common Information

DISPOSITION OF VIOLATION[1]

INFORMATION COMMON TO INSTANT VIOLATIONS
Dated December 16, 2010

REGISTERED ENTITY	NERC REGISTRY ID	NOC#
Gainesville Regional Utilities (GRU)	**NCR00032**	**NOC-208**

REGIONAL ENTITY
Florida Reliability Coordinating Council, Inc. (FRCC)

I. REGISTRATION INFORMATION

ENTITY IS REGISTERED FOR THE FOLLOWING FUNCTIONS:

BA	DP	GO	GOP	IA	LSE	PA	PSE	RC	RP	RSG	TO	TOP	TP	TSP
X	X	X	X	X	X	X			X		X	X	X	
5/29/07	**5/29/07**	**5/29/07**	**5/29/07**	**6/2/08**	**5/29/07**	**5/29/07**			**5/29/07**		**5/29/07**	**5/29/07**	**5/29/07**	

DESCRIPTION OF THE REGISTERED ENTITY

GRU is a multi-service utility owned by the City of Gainesville. It is the fifth largest municipal electric utility in Florida. GRU owns and operates three power plants: the John R. Kelly Generating Station located in downtown Gainesville, the Deerhaven Generating Station located near the city of Alachua, and the South Energy Center, which provides energy, chilled water, and steam to the Shands Cancer Hospital. These three generating stations, along with a 1.4 percent ownership in Florida Power Corporation's Crystal River Generating Unit Three, give GRU a combined net summer generation capacity of 609 MW. This affords GRU enough capacity to sell to other utilities. Today, as a publicly owned utility, GRU serves almost 80,000 customers with a service area of 130 square miles. Fifty-two percent of its electric distribution lines, which cover 1,269 total circuit miles, are now located underground.

IS THERE A SETTLEMENT AGREEMENT YES ☒ NO ☐

[1] For purposes of this document and attachments hereto, each violation at issue is described as a "violation," regardless of its procedural posture and whether it was a possible, alleged or confirmed violation.

WITH RESPECT TO THE VIOLATION(S), REGISTERED ENTITY

NEITHER ADMITS NOR DENIES IT (SETTLEMENT ONLY)	YES	☒
ADMITS TO IT	YES	☐
DOES NOT CONTEST IT (INCLUDING WITHIN 30 DAYS)	YES	☐

WITH RESPECT TO THE ASSESSED PENALTY OR SANCTION, REGISTERED ENTITY

ACCEPTS IT/ DOES NOT CONTEST IT	YES	☒

II. PENALTY INFORMATION

TOTAL ASSESSED PENALTY OR SANCTION OF **$45,000** FOR **SEVEN** VIOLATIONS OF RELIABILITY STANDARDS.

(1) REGISTERED ENTITY'S COMPLIANCE HISTORY

PRIOR VIOLATIONS OF ANY OF THE INSTANT RELIABILITY STANDARD(S) OR REQUIREMENT(S) THEREUNDER
YES ☐ NO ☒

LIST ANY CONFIRMED OR SETTLED VIOLATIONS AND STATUS

ADDITIONAL COMMENTS
The Settlement Agreement includes two violations of PRC-005-1 R2. FRCC considered the repeat violation of PRC-005-1 R2 (FRCC200900174) an aggravating factor in determining the penalty.

PRIOR VIOLATIONS OF OTHER RELIABILITY STANDARD(S) OR REQUIREMENTS THEREUNDER
YES ☐ NO ☒

LIST ANY PRIOR CONFIRMED OR SETTLED VIOLATIONS AND STATUS

ADDITIONAL COMMENTS

(2) THE DEGREE AND QUALITY OF COOPERATION BY THE REGISTERED ENTITY (IF THE RESPONSE TO FULL COOPERATION IS "NO," THE ABBREVIATED NOP FORM MAY NOT BE USED.)

FULL COOPERATION YES ☒ NO ☐
IF NO, EXPLAIN

(3) THE PRESENCE AND QUALITY OF THE REGISTERED ENTITY'S COMPLIANCE PROGRAM

IS THERE A DOCUMENTED COMPLIANCE PROGRAM
YES ☒ NO ☐
EXPLAIN
At the time of the violation, GRU had a documented internal compliance program (ICP) that had been signed and approved by a Senior Officer or equivalent.

FRCC determined that GRU's ICP at the time of the review was a neutral factor in the penalty determination.
GRU's ICP received high marks for:

1. **having a fully documented ICP that was approved by an Authorized Officer;**
2. **having the ICP disseminated to all employees;**
3. **having identified and staffed an ICP oversight position;**
4. **having the ICP oversight position supervised by a high level position;**
5. **the CIP oversight position having direct access to the Chief Executive Officer (CEO); and**
6. **reviewing the ICP on an annual cycle.**

The GRU compliance program in our August review scored low marks for:

1. **not having the ICP managed or operated independently of the work groups that are responsible for complying with the Reliability Standards;**
2. **not having necessary resources (staff and budget);**
3. **not having senior management actively and routinely participating in the ICP;**
4. **not including ICP training for employees;**
5. **not including formal, internal self-auditing for compliance with all applicable;**
6. **Reliability Standards on a set periodic basis**
7. **not including disciplinary action for employees involved in violations of Reliability Standards; and**

8. **not having internal controls including self-assessment and self-enforcement to prevent reoccurrence of Reliability Standard violations.**

As part of the Settlement Agreement, GRU agreed to undertake the following actions to improve its ICP, which FRCC considered mitigating factors in determining the penalty:

a. **Fully document the ICP, and have it reviewed, signed and approved by an Authorized Entity Officer or equivalent;**
b. **Training on and dissemination of the ICP to all of its employees specified in the ICP;**
c. **The ICP oversight position will be supervised at a high level within the organization;**
d. **The ICP oversight position will have independent access to its CEO and/or its Board of Directors;**
e. **The ICP will be managed and operated fully independent of the work groups that are responsible for complying with Reliability Standards to the extent possible;**
f. **The ICP will include internal self auditing for compliance on an annual basis for full compliance with all Reliability Standards applicable to the entity;**
g. **The ICP will include a formal review on a semi-annual or shorter cycle; and**
h. **The ICP will include disciplinary actions for employees involved in Reliability Standards violations.**

EXPLAIN SENIOR MANAGEMENT'S ROLE AND INVOLVEMENT WITH RESPECT TO THE REGISTERED ENTITY'S COMPLIANCE PROGRAM, INCLUDING WHETHER SENIOR MANAGEMENT TAKES ACTIONS THAT SUPPORT THE COMPLIANCE PROGRAM, SUCH AS TRAINING, COMPLIANCE AS A FACTOR IN EMPLOYEE EVALUATIONS, OR OTHERWISE.

At the time of the violation, it was unclear to FRCC as to Senior Management's role in the ICP.

The improved ICP described above will define (1) the role of senior management in fostering compliance; (2) effective preventive measures to ensure compliance; (3) prompt detection, cessation, and reporting of violations; and (4) remediation efforts.

(4) ANY ATTEMPT BY THE REGISTERED ENTITY TO CONCEAL THE VIOLATION(S) OR INFORMATION NEEDED TO REVIEW, EVALUATE OR INVESTIGATE THE VIOLATION.

YES ☐ NO ☒
IF YES, EXPLAIN

(5) ANY EVIDENCE THE VIOLATION(S) WERE INTENTIONAL (IF THE RESPONSE IS "YES," THE ABBREVIATED NOP FORM MAY NOT BE USED.)

YES ☐ NO ☒
IF YES, EXPLAIN

(6) ANY OTHER MITIGATING FACTORS FOR CONSIDERATION

YES ☐ NO ☒
IF YES, EXPLAIN

(7) ANY OTHER AGGRAVATING FACTORS FOR CONSIDERATION

YES ☐ NO ☒
IF YES, EXPLAIN

(8) ANY OTHER EXTENUATING CIRCUMSTANCES

YES ☐ NO ☒
IF YES, EXPLAIN

OTHER RELEVANT INFORMATION:

NOTICE OF ALLEGED VIOLATION AND PROPOSED PENALTY OR SANCTION ISSUED
DATE: OR N/A ☒

SETTLEMENT DISCUSSIONS COMMENCED
DATE: **5/20/09 for FRCC200900164, FRCC200900165, FRCC200900166 and FRCC200900167; 6/1/09 for FRCC200900174; 2/3/10 for FRCC200900309; and 9/9/10 for FRCC201000392.** OR N/A ☐

NOTICE OF CONFIRMED VIOLATION ISSUED
DATE: OR N/A ☒

SUPPLEMENTAL RECORD INFORMATION
DATE(S) OR N/A ☒

REGISTERED ENTITY RESPONSE CONTESTED
FINDINGS ☐ PENALTY ☐ BOTH ☐ NO CONTEST ☒

HEARING REQUESTED
YES ☐ NO ☒
DATE
OUTCOME
APPEAL REQUESTED

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NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Disposition Document for PRC-004-1 R2 (FRCC200900164)

DISPOSITION OF VIOLATION
Dated December 16, 2010

NERC TRACKING NO.	REGIONAL ENTITY TRACKING NO.	NOC. NO.
FRCC200900164	**GRU_2009_03**	**NOC-208**

I. VIOLATION INFORMATION

RELIABILITY STANDARD	REQUIREMENT(S)	SUB-REQUIREMENT(S)	VRF(S)	VSL(S)
PRC-004-1	**2**		**High**	**Lower**

VIOLATION APPLIES TO THE FOLLOWING FUNCTIONS:

BA	DP	GO	GOP	IA	LSE	PA	PSE	RC	RP	RSG	TO	TOP	TP	TSP
		X												

PURPOSE OF THE RELIABILITY STANDARD AND TEXT OF RELIABILITY STANDARD AND REQUIREMENT(S)/SUB-REQUIREMENT(S)

The purpose statement of PRC-004-1 provides: "Ensure all transmission and generation Protection System[1] Misoperations affecting the reliability of the Bulk Electric System (BES) are analyzed and mitigated." (Footnote added)

PRC-004-1 R2 provides: "The Generator Owner shall analyze its generator Protection System Misoperations, and shall develop and implement a Corrective Action Plan to avoid future Misoperations of a similar nature according to the Regional Reliability Organization's procedures developed for PRC-003 R1."[2]

VIOLATION DESCRIPTION

At the audit that was conducted from April 20, 2009 through April 24, 2009, Gainesville Regional Utilities (GRU) failed to provide evidence to demonstrate it had developed and implemented a Corrective Action Plan to avoid future Misoperations of a similar nature for a Misoperation that occurred on August 22, 2008. Specifically, the differential protection for generator step-up (GSU) transformer T-67 tripped for a fault outside its protection zone affecting the differential relay.

[1] *The NERC Glossary of Terms Used in Reliability Standards* defines Protection System as "Protective relays, associated communication systems, voltage and current sensing devices, station batteries and DC control circuitry."

[2] Consistent with applicable FERC precedent, the term "Regional Reliability Organization" in this context refers to FRCC.

RELIABILITY IMPACT STATEMENT- POTENTIAL AND ACTUAL

FRCC found that this violation did not pose a serious or substantial risk to the bulk power system (BPS) because GRU had reviewed and analyzed its Protection Systems for Misoperations. These actions minimized the impact to the BPS by reviewing, analyzing and rectifying the Misoperation even if GRU did not produce a Corrective Action Plan. The Misoperation was logged and reported.

II. DISCOVERY INFORMATION

METHOD OF DISCOVERY

SELF-REPORT	☐
SELF-CERTIFICATION	☐
COMPLIANCE AUDIT	☒
COMPLIANCE VIOLATION INVESTIGATION	☐
SPOT CHECK	☐
COMPLAINT	☐
PERIODIC DATA SUBMITTAL	☐
EXCEPTION REPORTING	☐

DURATION DATE(S) **8/22/08 (the date the original misoperation occurred, after which GRU failed to implement a Corrective Action Plan)- 6/17/09 (Mitigation Plan completion)**

DATE DISCOVERED BY OR REPORTED TO REGIONAL ENTITY **4/24/09**

IS THE VIOLATION STILL OCCURRING
YES ☐ NO ☒
IF YES, EXPLAIN

REMEDIAL ACTION DIRECTIVE ISSUED	YES	☐	NO	☒
PRE TO POST JUNE 18, 2007 VIOLATION	YES	☐	NO	☒

III. MITIGATION INFORMATION

FOR FINAL ACCEPTED MITIGATION PLAN:

MITIGATION PLAN NO.	**MIT-08-2115**
DATE SUBMITTED TO REGIONAL ENTITY	**5/22/09**
DATE ACCEPTED BY REGIONAL ENTITY	**6/21/09**
DATE APPROVED BY NERC	**11/10/09**
DATE PROVIDED TO FERC	**11/10/09**

IDENTIFY AND EXPLAIN ALL PRIOR VERSIONS THAT WERE ACCEPTED OR REJECTED, IF APPLICABLE
N/A

MITIGATION PLAN COMPLETED YES ☒ NO ☐

EXPECTED COMPLETION DATE **6/30/09**
EXTENSIONS GRANTED **NONE**
ACTUAL COMPLETION DATE **6/17/09**

DATE OF CERTIFICATION LETTER **6/18/09**
CERTIFIED COMPLETE BY REGISTERED ENTITY AS OF **6/17/09**

DATE OF VERIFICATION LETTER **10/8/09**
VERIFIED COMPLETE BY REGIONAL ENTITY AS OF **6/17/09**

ACTIONS TAKEN TO MITIGATE THE ISSUE AND PREVENT RECURRENCE
GRU developed a root cause analysis for the August 22, 2008 event and also developed a procedure titled *Root Cause Analysis for Transmission and Generation Misoperations* which provides a process for handling future Misoperations.

LIST OF EVIDENCE REVIEWED BY REGIONAL ENTITY TO EVALUATE COMPLETION OF MITIGATION PLAN OR MILESTONES (FOR CASES IN WHICH MITIGATION IS NOT YET COMPLETED, LIST EVIDENCE REVIEWED FOR COMPLETED MILESTONES)

GRU-01: *ROOT CAUSE ANALYSIS INCIDENT ON 06 AUGUST 2008 T-67 DIFFERENTIAL OPERATION DEERHAVEN GENERATING STATION (REVISED)*	**Dated 5/18/09**
GRU-02: *GRU PROCEDURE RS2 GRU- RELAY AND SUBSTATION DIVISION- ROOT CAUSE ANALYSIS FOR TRANSMISSION AND GENERATION PROTECTION MISOPERATIONS* This procedure was developed to ensure proper analysis, mitigation and prevention of future transmission and generation protection system Misoperations.	**Dated 5/12/09**

EXHIBITS:

SOURCE DOCUMENT
FRCC's Source Document Information dated September 28, 2010

MITIGATION PLAN
GRU's Mitigation Plan MIT-08-2115 submitted May 22, 2009

CERTIFICATION BY REGISTERED ENTITY
GRU's Certification of Mitigation Plan Completion dated June 18, 2009

VERIFICATION BY REGIONAL ENTITY
FRCC's Verification of Mitigation Plan Completion dated October 8, 2009

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NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Disposition Document for PRC-004-1 R1 (FRCC200900165)

DISPOSITION OF VIOLATION
Dated December 16, 2010

NERC TRACKING NO.	REGIONAL ENTITY TRACKING NO.	NOC. NO.
FRCC200900165	**GRU_2009_04**	**NOC-208**

I. VIOLATION INFORMATION

RELIABILITY STANDARD	REQUIREMENT(S)	SUB-REQUIREMENT(S)	VRF(S)	VSL(S)
PRC-004-1	**1**		**High**	**Lower**

VIOLATION APPLIES TO THE FOLLOWING FUNCTIONS:

BA	DP	GO	GOP	IA	LSE	PA	PSE	RC	RP	RSG	TO	TOP	TP	TSP
											X			

PURPOSE OF THE RELIABILITY STANDARD AND TEXT OF RELIABILITY STANDARD AND REQUIREMENT(S)/SUB-REQUIREMENT(S)

The purpose statement of PRC-004-1 provides: "Ensure all transmission and generation Protection System[1] Misoperations affecting the reliability of the Bulk Electric System (BES) are analyzed and mitigated."

PRC-004-1 R1 provides:

> **The Transmission Owner and any Distribution Provider that owns a transmission Protection System shall each analyze its transmission Protection System Misoperations and shall develop and implement a Corrective Action Plan to avoid future Misoperations of a similar nature according to the Regional Reliability Organization's[2] procedures developed for Reliability Standard PRC-003 Requirement 1.**

(Footnotes added.)

VIOLATION DESCRIPTION

At the audit that was conducted from April 20, 2009 through April 24, 2009, Gainesville Regional Utilities (GRU) failed to demonstrate that it had developed and implemented a Corrective Action Plan to avoid future Misoperations of a similar nature for a Misoperation which occurred on June 13, 2008. Specifically, GRU's

[1] *The NERC Glossary of Terms Used in Reliability Standards* defines Protection System as "Protective relays, associated communication systems, voltage and current sensing devices, station batteries and DC control circuitry."

[2] Consistent with applicable FERC precedent, the term "Regional Reliability Organization" in this context refers to FRCC.

transmission Line 9 was taken out of service to upgrade transmission line equipment from electromechanical to microprocessor relays. The relay upgrade was installed on June 11, 2008 and Line 9 was placed back in service with all systems operating normally on that day. On June 13, 2008, a line differential occurred and two breakers opened to clear the line and reclosed as prescribed. Upon investigation of the data from the microprocessor relays, it was determined that the fault occurred outside the zone of Line 9 three terminal line differential and there was an unusually high level of line differential operating current.

RELIABILITY IMPACT STATEMENT- POTENTIAL AND ACTUAL

FRCC found that this violation did not pose a serious or substantial risk to the bulk power system (BPS) because GRU had reviewed and analyzed its Protection Systems for Misoperations and had reported the event as part of its monthly Misoperations log to the Reliability Coordinator. GRU also developed and implemented a Corrective Action Plan for the applicable Protection System. The deficiency in this case was that GRU's Corrective Action Plan did not address avoidance of "future Misoperations of a similar nature."

It was determined that the current transformers at the substation were connected in reverse polarity on the third terminal of the line differential connections. The line differential function was disabled until personnel could rewire the connections properly. Further review found that the configuration (line differential) did not exist anywhere in the system and therefore could not cause an event of a similar nature. The impact on the BPS was minimal.

II. DISCOVERY INFORMATION

METHOD OF DISCOVERY

SELF-REPORT	☐
SELF-CERTIFICATION	☐
COMPLIANCE AUDIT	☒
COMPLIANCE VIOLATION INVESTIGATION	☐
SPOT CHECK	☐
COMPLAINT	☐
PERIODIC DATA SUBMITTAL	☐
EXCEPTION REPORTING	☐

DURATION DATE(S) **6/13/08 (the date the original Misoperation occurred, after which GRU failed to implement a Corrective Action Plan)- 6/17/09 (Mitigation Plan completion)**

DATE DISCOVERED BY OR REPORTED TO REGIONAL ENTITY **4/24/09**

IS THE VIOLATION STILL OCCURRING
YES ☐ NO ☒
IF YES, EXPLAIN

REMEDIAL ACTION DIRECTIVE ISSUED YES ☐ NO ☒
PRE TO POST JUNE 18, 2007 VIOLATION YES ☐ NO ☒

III. MITIGATION INFORMATION

FOR FINAL ACCEPTED MITIGATION PLAN:
MITIGATION PLAN NO. **MIT-08-2115**
DATE SUBMITTED TO REGIONAL ENTITY **5/22/09**
DATE ACCEPTED BY REGIONAL ENTITY **6/21/09**
DATE APPROVED BY NERC **11/10/09**
DATE PROVIDED TO FERC **11/10/09**

IDENTIFY AND EXPLAIN ALL PRIOR VERSIONS THAT WERE ACCEPTED OR REJECTED, IF APPLICABLE
N/A

MITIGATION PLAN COMPLETED YES ☒ NO ☐

EXPECTED COMPLETION DATE **6/30/09**
EXTENSIONS GRANTED **N/A**
ACTUAL COMPLETION DATE **6/17/09**

DATE OF CERTIFICATION LETTER **6/18/09**
CERTIFIED COMPLETE BY REGISTERED ENTITY AS OF **6/17/09**

DATE OF VERIFICATION LETTER **10/8/09**
VERIFIED COMPLETE BY REGIONAL ENTITY AS OF **6/17/09**

ACTIONS TAKEN TO MITIGATE THE ISSUE AND PREVENT RECURRENCE

GRU developed a root cause analysis for the June 13, 2008 event and also developed a procedure titled *Root Cause Analysis for Transmission and Generation Misoperations* which provides a process for handling future Misoperations.

LIST OF EVIDENCE REVIEWED BY REGIONAL ENTITY TO EVALUATE COMPLETION OF MITIGATION PLAN OR MILESTONES (FOR CASES IN WHICH MITIGATION IS NOT YET COMPLETED, LIST EVIDENCE REVIEWED FOR COMPLETED MILESTONES)

GRU-01: ***RS2 ROOT CAUSE ANALYSIS FOR MISOPERATION OF LINE 9 THREE TERMINAL TRANSMISSION LINE DIFFERENTIAL (REVISED)***	**Dated 5/18/09**
GRU-02: ***GRU PROCEDURE RS2 GRU- RELAY AND SUBSTATION DIVISION- ROOT CAUSE ANALYSIS FOR TRANSMISSION AND GENERATION PROTECTION MISOPERATIONS*** **This procedure was developed to ensure proper analysis, mitigation and prevention of future transmission and generation protection system Misoperations.**	**Dated 5/12/09**

EXHIBITS:

SOURCE DOCUMENT
FRCC's Source Document Information dated September 28, 2010

MITIGATION PLAN
GRU's Mitigation Plan MIT-08-2115 submitted May 22, 2009

CERTIFICATION BY REGISTERED ENTITY
GRU's Certification of Mitigation Plan Completion dated June 18, 2009

VERIFICATION BY REGIONAL ENTITY
FRCC's Verification of Mitigation Plan Completion dated October 8, 2009

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NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Disposition Document for PRC-005-1 R2/2.1 (FRCC200900166) and PRC-005-1 R1 (FRCC200900167)

DISPOSITION OF VIOLATION
Dated December 16, 2010

NERC TRACKING NO.	REGIONAL ENTITY TRACKING NO.	NOC. NO.
FRCC200900167	**GRU_2009_06**	**NOC-208**
FRCC200900166	**GRU_2009_05**	

I. VIOLATION INFORMATION

RELIABILITY STANDARD	REQUIREMENT(S)	SUB-REQUIREMENT(S)	VRF(S)	VSL(S)
PRC-005-1	**1**	**1.1, 1.2**	**High**[1]	**High**
PRC-005-1	**2**	**2.1**	**High**[2]	**Lower**

VIOLATION APPLIES TO THE FOLLOWING FUNCTIONS:

BA	DP	GO	GOP	IA	LSE	PA	PSE	RC	RP	RSG	TO	TOP	TP	TSP
		X									X			

PURPOSE OF THE RELIABILITY STANDARD AND TEXT OF RELIABILITY STANDARD AND REQUIREMENT(S)/SUB-REQUIREMENT(S)

The purpose statement of PRC-005-1 provides: "To ensure all transmission and generation Protection Systems affecting the reliability of the Bulk Electric System (BES) are maintained and tested."[3]

PRC-005-1 provides:

R1. Each Transmission Owner and any Distribution Provider that owns a transmission Protection System and each Generator Owner that owns a generation Protection System shall have a Protection System

[1] When NERC filed Violation Risk Factors (VRFs) for PRC-005-1, NERC originally assigned a "Medium" VRF to PRC-005-1 R1. In the Commission's May 18, 2007 Order on Violation Risk Factors, the Commission approved the VRF as filed but directed modifications. On June 1, 2007, NERC filed a modified "High" VRF for PRC-005 R1 for approval. On August 9, 2007, the Commission issued an Order approving the modified VRF. Therefore, the "Medium" VRF was in effect from June 18, 2007 until August 9, 2007 and the "High" VRF has been in effect since August 9, 2007. In the context of this case, FRCC determined that the violation related to both R1.1 and R1.2.

[2] PRC-005-1 R2 has a "Lower" VRF; R2.1 and R2.2 each have a "High" VRF. During a final review of the standards subsequent to the March 23, 2007 filing of the Version 1 VRFs, NERC identified that some standards requirements were missing VRFs; one of these include PRC-005-1 R2.1. On May 4, 2007, NERC assigned PRC-005 R2.1 a "High" VRF. In the Commission's June 26, 2007 Order on Violation Risk Factors, the Commission approved the PRC-005-1 R2.1 "High" VRF as filed. Therefore, the "High" VRF was in effect from June 26, 2007. In the context of this case, FRCC determined that the violation related to R2.1and therefore a "High" VRF is appropriate.

[3] *The NERC Glossary of Terms Used in Reliability Standards* defines Protection System as "Protective relays, associated communication systems, voltage and current sensing devices, station batteries and DC control circuitry."

maintenance and testing program for Protection Systems that affect the reliability of the BES. The program shall include:

R1.1. Maintenance and testing intervals and their basis.

R1.2. Summary of maintenance and testing procedures.

R2. Each Transmission Owner and any Distribution Provider that owns a transmission Protection System and each Generator Owner that owns a generation Protection System shall provide documentation of its Protection System maintenance and testing program and the implementation of that program to its Regional Reliability Organization[4] on request (within 30 calendar days). The documentation of the program implementation shall include:

R2.1. Evidence Protection System devices were maintained and tested within the defined intervals.

R2.2. Date each Protection System device was last tested/maintained.

VIOLATION DESCRIPTION

FRCC200900167:
At the audit conducted from April 20, 2009 through April 24, 2009, Gainesville Regional Utilities (GRU) provided documents that were insufficient to demonstrate that, for the period from June 18, 2007 until July 30, 2008, the Protection System maintenance and testing program for Protection System devices included an interval for and a summary of maintenance and testing procedures for the maintenance and testing of associated communication systems, DC control circuitry, and voltage and current sensing devices. Also, the documents provided were insufficient to demonstrate that, for the period June 18, 2007 until September 11, 2008, the program included a basis and interval for the maintenance and testing of transmission station batteries. Additionally, the documents provided were insufficient to demonstrate that the Protection System maintenance and testing program for Protection System devices that affect the BPS included a summary of maintenance and testing procedures for transmission station batteries from June 18, 2007 until August 7, 2008.

The documents provided were also insufficient to demonstrate that the Protection System maintenance and testing program for Protection System devices that affect the BPS included a summary of maintenance and testing procedures for associated communication systems and voltage and current sensing devices from March 1, 2009 until June 29, 2009. The documents also failed to provide a basis for maintenance and testing intervals of associated communication systems, DC control circuitry, and voltage and current sensing devices from June 18, 2007 until March 1, 2009.

[4] Consistent with applicable FERC precedent, the term "Regional Reliability Organization" in this context refers to FRCC.

FRCC200900166
At the audit dated conducted from April 20, 2009 through April 24, 2009, FRCC found that GRU failed to provide evidence that ten relays and seven battery banks for the transmission and generation function Protection System devices were maintained and tested within the defined intervals.

RELIABILITY IMPACT STATEMENT- POTENTIAL AND ACTUAL

FRCC finds that the violation did not pose a serious or substantial risk to the reliability of the BPS because:

FRCC200900167
GRU had performed testing and maintenance on associated communications, DC control circuitry, voltage and current sensing devices, and batteries based on manufacturer recommendations for testing and maintenance, but could not produce adequate documentation of the basis and/or intervals for all components as required.

FRCC200900166
The failure of any of the relays or batteries would have resulted in an alarm to the Control Center. Also, batteries at the generating facility were routinely checked several times a day by generating personnel. Also, the Protection System devices that were tested out of interval were found to be fully functional when tested.

II. DISCOVERY INFORMATION

METHOD OF DISCOVERY

SELF-REPORT	☐
SELF-CERTIFICATION	☐
COMPLIANCE AUDIT	☒
COMPLIANCE VIOLATION INVESTIGATION	☐
SPOT CHECK	☐
COMPLAINT	☐
PERIODIC DATA SUBMITTAL	☐
EXCEPTION REPORTING	☐

DURATION DATE(S)
PRC-005-1 R1.1: 6/18/07 (when the Standard became mandatory and enforceable) through 3/1/09 when basis was documented for testing intervals of associated communications systems, DC control circuitry, and voltage and current sensing devices)

PRC-005-1 R1.2: 6/18/07 (when the Standard became mandatory and enforceable) through 7/1/09 (when the steps were completed to have a complete R1.2 Mitigation Plan that included implementation of the maintenance and testing program for the generation batteries and other components of the generation protection system)

PRC-005-1 R2.1: 6/18/07 (when the Standard became mandatory and enforceable) through 11/30/08 (when protective relays went back into established intervals)

DATE DISCOVERED BY OR REPORTED TO REGIONAL ENTITY **4/24/09**

IS THE VIOLATION STILL OCCURRING
YES ☐ NO ☒
IF YES, EXPLAIN

REMEDIAL ACTION DIRECTIVE ISSUED	YES ☐	NO ☒
PRE TO POST JUNE 18, 2007 VIOLATION	YES ☐	NO ☒

III. MITIGATION INFORMATION

FOR FINAL ACCEPTED MITIGATION PLAN:

MITIGATION PLAN NO.	**MIT-07-2590**
DATE SUBMITTED TO REGIONAL ENTITY	**5/28/09**
DATE ACCEPTED BY REGIONAL ENTITY	**5/28/10**
DATE APPROVED BY NERC	**7/1/10**
DATE PROVIDED TO FERC	**7/1/10**

IDENTIFY AND EXPLAIN ALL PRIOR VERSIONS THAT WERE ACCEPTED OR REJECTED, IF APPLICABLE

MITIGATION PLAN COMPLETED YES ☒ NO ☐

EXPECTED COMPLETION DATE **06/01/10**
EXTENSIONS GRANTED **NONE**
ACTUAL COMPLETION DATE **2/25/10**

DATE OF CERTIFICATION LETTER **5/28/10**[5]
CERTIFIED COMPLETE BY REGISTERED ENTITY AS OF **2/25/10**

DATE OF VERIFICATION LETTER **6/7/10**
VERIFIED COMPLETE BY REGIONAL ENTITY AS OF **2/25/10**

[5] The Certification document is dated February 25, 2010 with a signature date of February 26, 2010. This form was revised and resubmitted to FRCC on May 28, 2010.

ACTIONS TAKEN TO MITIGATE THE ISSUE AND PREVENT RECURRENCE

GRU tested relays that were outside of the established interval, and to prevent future occurrences, a work order will be generated that will require a monthly review of all outstanding maintenance work orders to ensure compliance with PRC-005-1 R2. A time-based interval was added to all DC control circuits, current and voltage sensing devices, and part of the associated communication systems to ensure reliability of PRC-005-1 R1. The affected devices were tested or verified for proper operation (for PRC-005-1 R2) and then placed on an interval as indicated in the maintenance and testing program (PRC-005-1 R1).[6]

LIST OF EVIDENCE REVIEWED BY REGIONAL ENTITY TO EVALUATE COMPLETION OF MITIGATION PLAN OR MILESTONES

GRU-001: *GRU Prot Sys Maint & Test Prog6-29-09 R6.doc*- This document summarizes the maintenance and testing procedures for relays, DC control circuitry, associated communication systems and voltage and current sensing devices (R1)	**Dated 6/29/09**
GRU-002: *Priority Relay Test Submitted to FRCC 6-30-09* – This document provides the last test date and next due date of all protective relays. All relays previously out of testing interval are now in compliance with the maintenance and testing program (R2)	**Dated 6/30/09**
GRU-003: *GRU Battery PMs Generation Stations* This document shows implementation of the maintenance and testing program for the generation batteries (R2)	**Dated 5/19/10**
GRU-004: GRU Generation Station Battery Maintenance & Testing Program GRU Generation Stat Btry Maint test Prog Adopt 6_25_09.doc- This document summarizes the maintenance and testing procedures for station batteries (R1)	**Dated 6/25/09**
GRU-005: GRU Station Battery Maintenance Program -This document lists the steps to maintaining a battery (R1)	**Dated 12/23/09**
GRU-006: GRU *PRIORITY RELAY LIST WITH ASSOCIATED COMPONENT TESTS*- This document shows implementation of the maintenance and testing program for the other components of the generation protection system (R1)	**Dated 6/30/09**
GRU-007: "_1_09 Review of BES Maint.pdf Screenshot of a work order to *Review Bulk Electric System Components* (R2)	**Dated 6/29/09**

[6] The violation in FRCC200900166 was concurrent with the instant violation.

EXHIBITS:

SOURCE DOCUMENT
FRCC's Source Document Information dated December 3, 2010

MITIGATION PLAN**GRU's Mitigation Plan MIT-07-2590 submitted May 28, 2009**

CERTIFICATION BY REGISTERED ENTITY**GRU's Certification of Mitigation Plan Completion dated February 26, 2010 and submitted May 28, 2010**

VERIFICATION BY REGIONAL ENTITY
FRCC's Verification of Mitigation Plan Completion dated June 7, 2010

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Disposition Document for PRC-005-1 R2/2.1 (FRCC200900174)

DISPOSITION OF VIOLATION
Dated December 16, 2010

NERC TRACKING NO.	REGIONAL ENTITY TRACKING NO.	NOC. NO.
FRCC200900174	**GRU_2009_07**	**NOC-208**

I. VIOLATION INFORMATION

RELIABILITY STANDARD	REQUIREMENT(S)	SUB-REQUIREMENT(S)	VRF(S)	VSL(S)
PRC-005-1	**2**	**2.1**	**High**[1]	**Lower**

VIOLATION APPLIES TO THE FOLLOWING FUNCTIONS:

BA	DP	GO	GOP	IA	LSE	PA	PSE	RC	RP	RSG	TO	TOP	TP	TSP
											X			

PURPOSE OF THE RELIABILITY STANDARD AND TEXT OF RELIABILITY STANDARD AND REQUIREMENT(S)/SUB-REQUIREMENT(S)

The purpose statement of PRC-005-1 provides: "To ensure all transmission and generation Protection Systems[2] affecting the reliability of the Bulk Electric System (BES) are maintained and tested."

PRC-005-1 R2 provides:

> **R2. Each Transmission Owner and any Distribution Provider that owns a transmission Protection System and each Generator Owner that owns a generation Protection System shall provide documentation of its Protection System maintenance and testing program and the implementation of that program to its Regional Reliability Organization[3] on request (within 30 calendar days). The documentation of the program implementation shall include:**

[1] PRC-005-1 R2 has a "Lower" Violation Risk Factor (VRF); R2.1 and R2.2 each have a "High" VRF. During a final review of the standards subsequent to the March 23, 2007 filing of the Version 1 VRFs, NERC identified that some standards requirements were missing VRFs; one of these include PRC-005-1 R2.1. On May 4, 2007, NERC assigned PRC-005 R2.1 a "High" VRF. In the Commission's June 26, 2007 Order on Violation Risk Factors, the Commission approved the PRC-005-1 R2.1 "High" VRF as filed. Therefore, the "High" VRF was in effect from June 26, 2007. In the context of this case, FRCC determined that the violation related to R2.1and therefore a "High" VRF is appropriate.

[2] *The NERC Glossary of Terms Used in Reliability Standards* defines Protection System as "Protective relays, associated communication systems, voltage and current sensing devices, station batteries and DC control circuitry."

[3] Consistent with applicable FERC precedent, the term "Regional Reliability Organization" in this context refers to FRCC.

R2.1. Evidence Protection System devices were maintained and tested within the defined intervals.

R2.2. Date each Protection System device was last tested/maintained.

(Footnotes added)

VIOLATION DESCRIPTION

On April 8, 2009, Gainesville Regional Utilities (GRU) self-reported that it had one transmission relay that was found to be out of test interval from March 2, 2008 through June 22, 2008. According to the 2009 GRU Protection System maintenance and testing program, this relay was on a 6 year interval and their R2 list shows that it is a Schweitzer 351 relay.

RELIABILITY IMPACT STATEMENT- POTENTIAL AND ACTUAL

FRCC found that this violation did not pose a serious and substantial risk to the bulk power system (BPS) because, although GRU failed to test a relay within the interval specified in its Protection System testing and maintenance program, the violation involved only one relay, the delay in testing was for only 3 months, and this relay would also have alarmed into the Control Center in case of failure and technicians would have visited the site to investigate the issue. The relay found to be out of test interval from March 2, 2008 to June 22, 2008, transmission relay KATMSRLY1301A (a Schweitzer 351 digital relay) was tested on June 23, 2008 and found to be fully functional. As a fully functioning relay, the functioning capability of the device would not have had a detrimental impact to the BPS.

II. DISCOVERY INFORMATION

METHOD OF DISCOVERY

SELF-REPORT	☒
SELF-CERTIFICATION	☐
COMPLIANCE AUDIT	☐
COMPLIANCE VIOLATION INVESTIGATION	☐
SPOT CHECK	☐
COMPLAINT	☐
PERIODIC DATA SUBMITTAL	☐
EXCEPTION REPORTING	☐

DURATION DATE(S) **3/2/08 (date transmission relay began to be out of test interval)- 6/22/08 (date transmission relay was tested and found to be fully functional)**

DATE DISCOVERED BY OR REPORTED TO REGIONAL ENTITY **4/8/09**[4]

IS THE VIOLATION STILL OCCURRING
YES ☐ NO ☒
IF YES, EXPLAIN

REMEDIAL ACTION DIRECTIVE ISSUED YES ☐ NO ☒
PRE TO POST JUNE 18, 2007 VIOLATION YES ☐ NO ☒

III. MITIGATION INFORMATION

FOR FINAL ACCEPTED MITIGATION PLAN:
MITIGATION PLAN NO. **MIT-09-1727**
DATE SUBMITTED TO REGIONAL ENTITY **5/7/09**
DATE ACCEPTED BY REGIONAL ENTITY **5/7/09**
DATE APPROVED BY NERC **6/8/09**
DATE PROVIDED TO FERC **6/8/09**

IDENTIFY AND EXPLAIN ALL PRIOR VERSIONS THAT WERE ACCEPTED OR REJECTED, IF APPLICABLE

In a letter dated May 1, 2009, FRCC requested GRU revise its Mitigation Plan dated April 8, 2009 because the "descriptor of the reported relay is incorrect. It does not match the descriptor used in GRU's Protection System Testing and Maintenance Program. Also the dates do not match the dates presented in GRU's Protection System and Maintenance program."

GRU then submitted a revised Mitigation Plan dated May 7, 2009 correcting the issue. GRU also resubmitted an accompanying revised Certification of Mitigation Plan Completion on May 7, 2009.

MITIGATION PLAN COMPLETED YES ☒ NO ☐

EXPECTED COMPLETION DATE **Submitted as complete**
EXTENSIONS GRANTED **NONE**
ACTUAL COMPLETION DATE **6/24/08**

DATE OF CERTIFICATION LETTER **5/7/09**
CERTIFIED COMPLETE BY REGISTERED ENTITY AS OF **6/24/08**

DATE OF VERIFICATION LETTER **5/27/09**
VERIFIED COMPLETE BY REGIONAL ENTITY AS OF **6/24/08**

[4] April 8, 2009 is the date the Self-Report was submitted to the FRCC's compliance manager in-box, the date listed for the Self-Report in the Mitigation Plan is March 2, 2008.

ACTIONS TAKEN TO MITIGATE THE ISSUE AND PREVENT RECURRENCE
GRU provided evidence of testing of the relay that was out of interval.

LIST OF EVIDENCE REVIEWED BY REGIONAL ENTITY TO EVALUATE COMPLETION OF MITIGATION PLAN OR MILESTONES (FOR CASES IN WHICH MITIGATION IS NOT YET COMPLETED, LIST EVIDENCE REVIEWED FOR COMPLETED MILESTONES)

GRU-01: ***Relay Test Report CS-1301*** **This documentation shows the relay test results for Circuit Switcher #1301 at Kanapaha substation**	**Dated March 2002 and June 2008**
GRU-02: ***Test Work Order 00051385 for SEL 351 CS1301*** **showing a completion date of 6/24/08**	**Dated 6/24/08**

EXHIBITS:

SOURCE DOCUMENT
GRU's Self-Report dated April 8, 2009

MITIGATION PLAN
GRU's Mitigation Plan MIT-09-1727 submitted May 7, 2009

CERTIFICATION BY REGISTERED ENTITY
GRU's Certification of Mitigation Plan Completion dated May 7, 2009

VERIFICATION BY REGIONAL ENTITY
FRCC's Verification of Mitigation Plan Completion dated May 27, 2009

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Disposition Document for PRC-008-0 R2 (FRCC200900309)

DISPOSITION OF VIOLATION
Dated December 17, 2010

NERC TRACKING NO.	REGIONAL ENTITY TRACKING NO.	NOC. NO.
FRCC200900309	**GRU_2009_09**	**NOC-208**

I. VIOLATION INFORMATION

RELIABILITY STANDARD	REQUIREMENT(S)	SUB-REQUIREMENT(S)	VRF(S)	VSL(S)
PRC-008-0	**2**		**Medium**	**N/A**

VIOLATION APPLIES TO THE FOLLOWING FUNCTIONS:

BA	DP	GO	GOP	IA	LSE	PA	PSE	RC	RP	RSG	TO	TOP	TP	TSP
	X										X			

PURPOSE OF THE RELIABILITY STANDARD AND TEXT OF RELIABILITY STANDARD AND REQUIREMENT(S)/SUB-REQUIREMENT(S)

The purpose statement of PRC-008-0 provides: "Provide last resort system preservation measures by implementing an Under Frequency Load Shedding (UFLS) program."

PRC-008-0 R2 provides: "The Transmission Owner and Distribution Provider with a UFLS program (as required by its Regional Reliability Organization[1]) shall implement its UFLS equipment maintenance and testing program and shall provide UFLS maintenance and testing program results to its Regional Reliability Organization and NERC on request (within 30 calendar days)." (Footnote added)

VIOLATION DESCRIPTION

On June 4, 2009 Gainesville Regional Utilities (GRU) self-reported to FRCC a violation of PRC-008-0 R2. GRU stated it had one under-frequency relay that was not tested within its prescribed six-year interval. The relay was originally tested March 2003. With a six-year testing interval, the relay was due to be tested March 1, 2009, but due to a clerical error of the test date the relay was not tested until May 19, 2009. GRU has a total of 31 underfrequency relays present on its Underfrequency Relays Master sheet.

[1] Consistent with applicable FERC precedent, the term "Regional Reliability Organization" in this context refers to FRCC.

RELIABILITY IMPACT STATEMENT- POTENTIAL AND ACTUAL

FRCC finds that the violation did not pose a serious or substantial risk to the reliability of the bulk power system (BPS) because the testing was delayed only 2.5 months beyond the scheduled 6-year testing interval.

Further, GRU asserted that even though the relay (a digital relay with its overcurrent and underfrequency tripping functions active) had not been tested within interval, it had been functioning properly for its intended purpose. The relay was found fully functional when tested on May 19, 2009.

II. DISCOVERY INFORMATION

METHOD OF DISCOVERY

SELF-REPORT	☒
SELF-CERTIFICATION	☐
COMPLIANCE AUDIT	☐
COMPLIANCE VIOLATION INVESTIGATION	☐
SPOT CHECK	☐
COMPLAINT	☐
PERIODIC DATA SUBMITTAL	☐
EXCEPTION REPORTING	☐

DURATION DATE(S) **3/1/2009 (date relay should have been tested)- 5/18/2009 (date relay was actually tested)**

DATE DISCOVERED BY OR REPORTED TO REGIONAL ENTITY **6/4/09**

IS THE VIOLATION STILL OCCURRING
YES ☐ NO ☒
IF YES, EXPLAIN

REMEDIAL ACTION DIRECTIVE ISSUED	YES	☐	NO	☒
PRE TO POST JUNE 18, 2007 VIOLATION	YES	☐	NO	☒

III. MITIGATION INFORMATION

FOR FINAL ACCEPTED MITIGATION PLAN:

MITIGATION PLAN NO.	**MIT-09-2323**
DATE SUBMITTED TO REGIONAL ENTITY	**6/4/09**
DATE ACCEPTED BY REGIONAL ENTITY	**2/1/10**
DATE APPROVED BY NERC	**2/9/10**
DATE PROVIDED TO FERC	**2/9/10**

IDENTIFY AND EXPLAIN ALL PRIOR VERSIONS THAT WERE ACCEPTED OR REJECTED, IF APPLICABLE

MITIGATION PLAN COMPLETED YES ☒ NO ☐

EXPECTED COMPLETION DATE **Submitted as complete**
EXTENSIONS GRANTED **NONE**
ACTUAL COMPLETION DATE **5/19/09**

DATE OF CERTIFICATION LETTER **6/4/09**
CERTIFIED COMPLETE BY REGISTERED ENTITY AS OF **5/19/09**

DATE OF VERIFICATION LETTER **2/3/10**
VERIFIED COMPLETE BY REGIONAL ENTITY AS OF **5/19/10**

ACTIONS TAKEN TO MITIGATE THE ISSUE AND PREVENT RECURRENCE
GRU performed relay testing to bring the underfrequency relay back into compliance. GRU also generated monthly work orders to review relay testing statuses. GRU audited all underfrequency relay test dates to verify compliance.

LIST OF EVIDENCE REVIEWED BY REGIONAL ENTITY TO EVALUATE COMPLETION OF MITIGATION PLAN OR MILESTONES (FOR CASES IN WHICH MITIGATION IS NOT YET COMPLETED, LIST EVIDENCE REVIEWED FOR COMPLETED MILESTONES)

GRU-01: *Underfrequency Relays Master.xls* This document shows the relay test dates for the Relay Breaker 1433 Underfrequency at the Ironwood Plant having been tested on 5/19/09	**Dated 6/1/09**

EXHIBITS:

SOURCE DOCUMENT
GRU's undated Self-Report submitted June 4, 2009

MITIGATION PLAN
GRU's Mitigation Plan MIT-09-2323 submitted June 4, 2009

CERTIFICATION BY REGISTERED ENTITY
GRU's Certification of Mitigation Plan Completion dated June 4, 2009

VERIFICATION BY REGISTERED ENTITY
FRCC's Verification of Mitigation Plan Completion dated February 3, 2010

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Disposition Document for BAL-005-0.1b R11 (FRCC201000392)

DISPOSITION OF VIOLATION
Dated December 16, 2010

NERC TRACKING NO.	REGIONAL ENTITY TRACKING NO.	NOC. NO.
FRCC201000392	**FRCC2010-100408**	**NOC-208**

I. VIOLATION INFORMATION

RELIABILITY STANDARD	REQUIREMENT(S)	SUB-REQUIREMENT(S)	VRF(S)	VSL(S)
BAL-005-0.1b[1]	**11**		**Medium**	**Severe**

VIOLATION APPLIES TO THE FOLLOWING FUNCTIONS:

BA	DP	GO	GOP	IA	LSE	PA	PSE	RC	RP	RSG	TO	TOP	TP	TSP
X														

PURPOSE OF THE RELIABILITY STANDARD AND TEXT OF RELIABILITY STANDARD AND REQUIREMENT(S)/SUB-REQUIREMENT(S)

The purpose statement of BAL-005-0.1b provides:

> **This standard establishes requirements for Balancing Authority Automatic Generation Control (AGC) necessary to calculate Area Control Error (ACE) and to routinely deploy the Regulating Reserve. The standard also ensures that all facilities and load electrically synchronized to the Interconnection are included within the metered boundary of a Balancing Area so that balancing of resources and demand can be achieved.**

BAL-005-0.1b R11 provides: "Balancing Authorities shall include the effect of ramp rates, which shall be identical and agreed to between affected Balancing Authorities, in the Scheduled Interchange values to calculate ACE."

VIOLATION DESCRIPTION

During a Spot Check conducted on September 2, 2010, FRCC discovered there were three Gainesville Regional Authority (GRU) Interchange Transaction Tags (tags) between June 20, 2009 and August 21, 2009 that did not identify the ramp rate start/stop times (null value). GRU reported that its default ramp rate for a null tag in its Energy Management System (EMS) or interchange scheduler is 20 minutes for

[1] BAL-005-0 was enforceable from June 18, 2007 through August 27, 2008. BAL-005-0b was approved by the Commission and became enforceable on August 28, 2008. BAL-005-0.1b is the current enforceable Standard as of May 13, 2009. The subsequent interpretations provide clarity regarding the responsibilities of a registered entity and do not change the meaning or language of the original NERC Reliability Standard and its requirements. For consistency in this filing, the current version of the NERC Reliability Standard effective for the duration of the violation, BAL-005-0.1b, is used throughout.

schedules inside or outside the FRCC footprint. As evidenced in the three tags, the default used by GRU and the other party to the tag for these null tags were not the same ramp rate and did not accurately include the effects of ramp rate in its Schedule Interchange value to calculate ACE.

This violation is limited to interchange transactions for which the start/stop time was initially provided by the tag originator and for which the entity assigned a start/stop time that was different than what other Balancing Authorities included in their Scheduled Interchange.

RELIABILITY IMPACT STATEMENT- POTENTIAL AND ACTUAL

FRCC finds that the violation did not pose a serious or substantial risk to the reliability of the bulk power system (BPS) because:

The mismatch was only between a 10 or 20 minute ramp rate in the Scheduled Interchange between affected Balancing Authorities, and there were no subsequent violations reported for Control Performance Standards (CPS1 and CPS2) for BAL-001-0.1a by the affected entities.

The only potential effect to the BPS has been a temporary increase in inadvertent energy during the ramp times.

The impact is also minimized due to the small number of the tags that had this mismatch in ramp times and the ramp was only between a rate of ten minutes at one Balancing Authority and twenty minutes at the other Balancing Authority.

II. DISCOVERY INFORMATION

METHOD OF DISCOVERY

SELF-REPORT	☐
SELF-CERTIFICATION	☐
COMPLIANCE AUDIT	☐
COMPLIANCE VIOLATION INVESTIGATION	☐
SPOT CHECK	☒
COMPLAINT	☐
PERIODIC DATA SUBMITTAL	☐
EXCEPTION REPORTING	☐

DURATION DATE(S) **6/20/09 (the start/stop time that was initially provided by the tag originator) - 1/28/10 (when GRU implemented a transaction approval process).)**

DATE DISCOVERED BY OR REPORTED TO REGIONAL ENTITY **9/2/10**[2]

[2] On September 28, 2009, GRU self-reported INT-007-1 R1 (FRCC200900258) which was ultimately dismissed on August 18, 2010 and replaced with BAL-005-0.1b R11 (FRCC201000392) at the completion

IS THE VIOLATION STILL OCCURRING
YES ☐ NO ☒
IF YES, EXPLAIN

REMEDIAL ACTION DIRECTIVE ISSUED YES ☐ NO ☒
PRE TO POST JUNE 18, 2007 VIOLATION YES ☐ NO ☒

III. MITIGATION INFORMATION

FOR FINAL ACCEPTED MITIGATION PLAN:
MITIGATION PLAN NO. **MIT-07-2846**
DATE SUBMITTED TO REGIONAL ENTITY **9/9/10**
DATE ACCEPTED BY REGIONAL ENTITY **9/10/10**
DATE APPROVED BY NERC **10/5/10**
DATE PROVIDED TO FERC **10/6/10**

IDENTIFY AND EXPLAIN ALL PRIOR VERSIONS THAT WERE ACCEPTED OR REJECTED, IF APPLICABLE

NONE

MITIGATION PLAN COMPLETED YES ☒ NO ☐

EXPECTED COMPLETION DATE **1/31/10**
EXTENSIONS GRANTED NONE
ACTUAL COMPLETION DATE **1/27/10**

DATE OF CERTIFICATION LETTER **9/9/10**
CERTIFIED COMPLETE BY REGISTERED ENTITY AS OF **1/27/10**

DATE OF VERIFICATION LETTER **10/20/10**
VERIFIED COMPLETE BY REGIONAL ENTITY AS OF **1/27/10**

ACTIONS TAKEN TO MITIGATE THE ISSUE AND PREVENT RECURRENCE

GRU changed its procedures to reject any transactions that do not specify a ramp time. GRU's power system coordinators were then directed to follow the revised procedure effective immediately on September 9, 2009. A

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of FRCC's Spot Check (FRCC determined BAL-005-0.1b R11 was the more appropriate Standard and Requirement relevant to the violation).

transaction approval procedure was implemented as of January 27, 2010 to address all steps of the transaction approval process.

LIST OF EVIDENCE REVIEWED BY REGIONAL ENTITY TO EVALUATE COMPLETION OF MITIGATION PLAN OR MILESTONES (FOR CASES IN WHICH MITIGATION IS NOT YET COMPLETED, LIST EVIDENCE REVIEWED FOR COMPLETED MILESTONES)

GRU-01: ***GRU Electric Systems Operations Procedure# SCC 72*** **Subject Electronic Tagging (E-Tags) Verification Requirements**	**Dated 1/27/10**

EXHIBITS:

SOURCE DOCUMENT
FRCC's Source Document Information dated September 23, 2010

MITIGATION PLAN
GRU's Mitigation Plan MIT-07-2846 submitted September 9, 2010

CERTIFICATION BY REGISTERED ENTITY
GRU's Certification of Mitigation Plan Completion dated September 9, 2010

VERIFICATION BY REGIONAL ENTITY
FRCC's Verification of Mitigation Plan Completion dated October 20, 2010

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment b

Record Documents for PRC-004-1 R2 (FRCC200900164) and PRC-004-1 R1 (FRCC200900165)

i. FRCC's Source Document Information dated September 28, 2010

ii. GRU's Mitigation Plan MIT-08-2115 submitted May 22, 2009

iii. GRU's Certification of Mitigation Plan Completion dated June 18, 2009

iv. FRCC's Verification of Mitigation Plan Completion dated October 8, 2009

FLORIDA RELIABILITY COORDINATING COUNCIL, INC.
1408 N. WESTSHORE BLVD., SUITE 1002
TAMPA, FLORIDA 33607-4512
PHONE 813.289.5644 • FAX 813.289.5646
WWW.FRCC.COM

SOURCE DOCUMENT INFORMATION
Dated 9/28/10

Registered Entity: Gainesville Regional Utilities (GRU)
NERC Registry ID #: NCR00032
NERC #: FRCC200900164

	STANDARD NUMBER	REQUIREMENT	DISCOVERY	DISCOVERY DATE	FINDING
1	PRC-004-1	2	Compliance Audit	4/24/09	NON-COMPLIANT- GRU failed to provide evidence to demonstrate it had developed and implemented a Corrective Action Plan to avoid future misoperations of a similar nature for a misoperation that occurred on 8/22/08.

Mitigation Plan Submittal Form

Date this Mitigation Plan is being submitted: May 22, 2009

Section A: Compliance Notices & Mitigation Plan Requirements

A.1 Notices and requirements applicable to Mitigation Plans and this Submittal Form are set forth in "Attachment A - Compliance Notices & Mitigation Plan Requirements" to this form.

A.2 ☒ I have reviewed Attachment A and understand that this Mitigation Plan Submittal Form will not be accepted unless this box is checked.

Section B: Registered Entity Information

B.1 Identify your organization:

Company Name: Gainesville Regional Utilities
Company Address: P.O. Box 147117 E37 Gainesville, Fl 32614-7117
NERC Compliance Registry ID: NCR00032

B.2 Identify the individual in your organization who will be the Entity Contact regarding this Mitigation Plan.

Name: Ken Simmons
Title: Systems Control Manager
Email: simmonskm@gru.com
Phone: 352-393-6412

Section C: Identification of Alleged or Confirmed Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following Alleged or Confirmed violation(s) of the reliability standard listed below.

Applicable Standard, Requirement(s) and dates:

NERC Violation ID #	Reliability Standard	Requirement Number	Violation Risk Factor	Alleged or Confirmed Violation Date(*)	Method of Detection (*e.g.*, Audit, Self-report, Investigation)
FRCC200900164	PRC-004-1	R2	Unknown	8/22/2008 Alleged	Compliance Audit
FRCC200900165	PRC-004-1	R1	Unknown	6/13/2008 Alleged	Compliance Audit

(*) Note: The Alleged or Confirmed Violation Date shall be expressly specified by Registered Entity, and subject to modification by the FRCC, as: (i) the date the Alleged or Confirmed violation occurred; (ii) the date that the Alleged or Confirmed violation was self-reported; or (iii) the date that the Alleged or Confirmed violation has been deemed to have occurred on by the FRCC. Questions regarding the date to use should be directed to the FRCC contact identified in Section G of this form.

C.2 Identify the cause of the Alleged or Confirmed violation(s) identified above. Additional detailed information may be provided as an attachment:

FRCC200900164 PRC-004-1 R2

The cause of the alleged or confirmed violation identified above is as follows:

Evidence provided by GRU was insufficient to demonstrate that GRU had developed and implemented a Corrective Action Plan to avoid future misoperations [generation] of a similar nature for the event which occurred on August 22, 2008.

FRCC200900165 PRC-004-1 R1

The cause of the alleged or confirmed violation identified above is as follows:

Evidence provided by GRU was insufficient to demonstrate that GRU had developed and implemented a Corrective Action Plan to avoid future misoperations [transmission] of a similar nature for the event which occurred on June 13, 2008.

C.3 Provide any additional relevant information regarding the Alleged or Confirmed violations associated with this Mitigation Plan. Additional detailed information may be provided as an attachment:

FRCC200900164 PRC-004-1 R2

The differential protection for GSU transformer T-67 tripped for a fault outside its protection zone.

These three-single phase transformers externally wired in a delta-wye configuration and the CT wiring configuration are a unique configuration and is the only one of this kind on our bulk electric system.

A Root Cause Analysis was completed for this misoperation and corrective actions were performed, however the Root Cause Analysis did not provide documentation of the Corrective Action Plan to avoid future misoperations [generation] of a similar nature for the event which occurred on August 22, 2008.

FRCC200900165 PRC-004-1 R1
Line 9 transmission line tripped for a fault outside its protection zone.

At the time of installation, this Line 9 three terminal transmission relay protection was a unique configuration and the only one of this kind on our bulk electric system.

A Root Cause Analysis was completed for this misoperation and corrective actions were performed, however the Root Cause Analysis did not provide documentation of the Corrective Action Plan to avoid future misoperations [transmission] of a similar nature for the event which occurred on June 13, 2008.

Section D: Details of Proposed Mitigation Plan

Mitigation Plan Contents

D.1 Identify and describe the action plan, including specific tasks and actions that your organization is proposing to undertake, or which it undertook if this Mitigation Plan has been completed, to correct the Alleged or Confirmed violations identified above in Part C.1 of this form. Additional detailed information may be provided as an attachment:

1. Revise Root Cause Analysis for the Generation Misoperation NERC #FRCC200900164 to demonstrate how we developed and implemented a Corrective Action Plan to avoid future misoperations [generation] of a similar nature for the event which occurred on August 22, 2008.
2. Revise Root Cause Analysis for the Transmission Misoperation NERC #FRCC200900165 to demonstrate how we developed and implemented a Corrective Action Plan to avoid future misoperations [transmission] of a similar nature for the event which occurred on June 13, 2008.
3. Provide a Revised Root Cause Analysis Procedure to ensure all requirements of PRC-004 are satisfied when analyzing misoperations in the future.

Mitigation Plan Timeline and Milestones

D.2 Provide the date by which full implementation of the Mitigation Plan will be, or has been, completed with respect to the Alleged or Confirmed violations

identified above. State whether the Mitigation Plan has been fully implemented: June 30, 2009

D.3 Enter Milestone Activities, with due dates, that your organization is proposing, or has completed, for this Mitigation Plan:

Milestone Activity	Proposed/Actual Completion Date* (shall not be more than 3 months apart)
Revise Root Cause Analysis for 8/22/2008 Misoperation to show implemented corrective action to prevent future occurrences of a similar nature	June 30, 2009
Revise Root Cause Analysis for 6/13/2008 Misoperation to show implemented corrective action to prevent future occurrences of a similar nature	June 30, 2009
Issue Procedure # RS2 Root Cause Analysis for Transmission and Generation Protection System Misoperations.	June 1, 2009

(*) Note: Implementation milestones no more than three (3) months apart are permissible only for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

Section E: Interim and Future Reliability Risk

Abatement of Interim BPS Reliability Risk

E.1 While your organization is implementing this Mitigation Plan the reliability of the Bulk Power System (BPS) may remain at higher risk or be otherwise negatively impacted until the plan is successfully completed. To the extent they are, or may be, known or anticipated: (i) identify any such risks or impacts; and (ii) discuss any actions that your organization is planning to take to mitigate this increased risk to the reliability of the BPS. Additional detailed information may be provided as an attachment:

There was no impact on reliability.

FRCC200900164 PRC-004-1 R2

A Root Cause Analysis was completed for this misoperation and corrective actions were performed, however the Root Cause Analysis did not provide documentation of the Corrective Action Plan to avoid future misoperations [generation] of a similar nature for the event which occurred on August 22, 2008.

FRCC200900165 PRC-004-1 R1

A Root Cause Analysis was completed for this misoperation and corrective actions were performed, however the Root Cause Analysis did not provide documentation of the Corrective Action Plan to avoid future misoperations [transmission] of a similar nature for the event which occurred on June 13, 2008.

Prevention of Future BPS Reliability Risk

E.2 Describe how successful completion of this Mitigation Plan will prevent or minimize the probability that your organization incurs further risk or Alleged violations of the same or similar reliability standards requirements in the future. Additional detailed information may be provided as an attachment:

Revised procedures will improve communications and ensure proper documentation, investigation and follow-up is completed of all relay operations to be investigated.

FRCC
Florida Reliability Coordinating Council, Inc.

Section F: Authorization

An authorized individual must sign and date this Mitigation Plan Submittal Form. By doing so, this individual, on behalf of your organization:

a) Submits this Mitigation Plan for acceptance by the FRCC and approval by NERC, and

b) If applicable, certifies that this Mitigation Plan was completed on or before the date provided as the 'Date of Completion of the Mitigation Plan' on this form, and

c) Acknowledges:

1. I am Systems Control Manager of Gainesville regional Utilities (GRU)

2. I am qualified to sign this Mitigation Plan on behalf of GRU

3. I understand GRU's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure, including Appendix 4(C) (Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation" (NERC CMEP)).

3. I have read and am familiar with the contents of this Mitigation Plan.

4. GRU agrees to comply with, this Mitigation Plan, including the timetable completion date, as accepted by the FRCC and approved by NERC.

Authorized Individual Signature 

Name (Print): Ken Simmons
Title: Systems Control Manager
Date: May 22, 2009

Section G: Regional Entity Contact

Please direct any questions regarding completion of this form to:

Madeline Alba, FRCC Compliance Program Administrator
813-207-7965
malba@frcc.com

Attachment A – Compliance Notices & Mitigation Plan Requirements

I. Section 6.2 of the CMEP[1] sets forth the information that must be included in a Mitigation Plan. The Mitigation Plan must include:

(1) The Registered Entity's point of contact for the Mitigation Plan, who shall be a person (i) responsible for filing the Mitigation Plan, (ii) technically knowledgeable regarding the Mitigation Plan, and (iii) authorized and competent to respond to questions regarding the status of the Mitigation Plan. This person may be the Registered Entity's point of contact described in Section 2.0.

(2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.

(3) The cause of the Alleged or Confirmed Violation(s).

(4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).

(5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).

(6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.

(7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.

(8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

(9) Any other information deemed necessary or appropriate.

(10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self-Certification or Self Reporting submittals.

II. This submittal form must be used to provide a required Mitigation Plan for review and acceptance by the FRCC and approval by NERC.

III. This Mitigation Plan is submitted to the FRCC and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.

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[1] "*Uniform Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation*;" a copy of the current version approved by the Federal Energy Regulatory Commission is posted on NERC's website.

IV. This Mitigation Plan Submittal Form may be used to address one or more related Alleged or Confirmed violations of one Reliability Standard. A separate mitigation plan is required to address Alleged or Confirmed violations with respect to each additional Reliability Standard, as applicable.

V. If the Mitigation Plan is accepted by the FRCC and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission in accordance with applicable Commission rules, regulations and orders.

VI. The FRCC or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.

VII. Remedial action directives also may be issued as necessary to ensure reliability of the BPS.

FRCC Mitigation Plan Completion Form

Certification of a Completed Mitigation Plan

All Mitigation Plan Completion Certification submittals shall include data or information sufficient for FRCC to verify completion of the Mitigation Plan. FRCC may request such additional data or information and conduct follow-up assessments, on-site or other Spot Checking, or Compliance Audits as it deems necessary to verify that all required actions in the Mitigation Plan have been completed and the Registered Entity is in compliance with the subject Reliability Standard. (CMEP Section 6.6)

Registered Entity Information
Company Name: Gainesville Regional Utilities
Company Address: P.O. Box 147117 E37, Gainesville, Fl 32614-7117
NERC Compliance Registry ID (*if known*): NCR00032

Date Original Mitigation Plan was submitted to FRCC: 5/22/2009

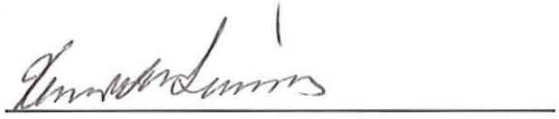
Date Mitigation Plan was completed: 6/17/2009

Name of Standard and the Requirement(s) covered under the accepted Mitigation Plan: Analysis and Mitigation of Transmission and Generation Protection System Misoperations - PRC-004-1 R1, R2

NERC Violation ID # (*if known*): FRCC200900164, FRCC200900165

Date of Certification: 6/18/2009

I certify that the mitigation plan for the above named alleged or confirmed violation has been completed on the date shown above, and that all information submitted information is complete and correct to the best of my knowledge.

Name: Ken Simmons
Title: Systems Control Manager
Email: simmonskm@gru.com
Phone: 352-393-6412
Authorized Individual Signature 

To close out a completed Mitigation Plan, fill out this form, save and email it to compliancemanager@frcc.com.

FLORIDA RELIABILITY COORDINATING COUNCIL, INC.
1408 N. WESTSHORE BLVD., SUITE 1002
TAMPA, FLORIDA 33607-4512
PHONE 813.289.5644 • FAX 813.289.5646
WWW.FRCC.COM

VIA E-MAIL

October 8, 2009

Richard Bachmeier
Electric System Planning Director
Gainesville Regional Utilities (GRU)
P.O. Box 147117, Station A136
301 SE 4th Avenue
Gainesville, Florida 32614-7117

Re: GRU Mitigation Plan Completion for Reliability Standards PRC-004-1 R1 and R2

NERC Violation #: FRCC200900165 and FRCC200900164

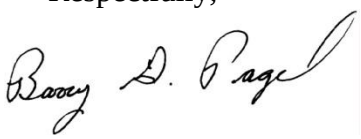
Dear Mr. Bachmeier,

The Florida Electric Reliability Council, Inc. (FRCC) Compliance Staff has reviewed the mitigation plan submitted by the Gainesville Regional Utilities (GRU) for the NERC Reliability Standard listed above.

The submitted mitigation plan was accepted on June 21, 2009 and after review, the FRCC staff has determined that GRU has completed its mitigation plan for the reliability standard referenced above. The FRCC will forward the mitigation plan to the North American Electric Reliability Corporation (NERC) for their review and approval. NERC will also send an approved mitigation plan to the Federal Energy Regulatory Commission (FERC) as non-confidential information. The FRCC will also notify NERC that GRU has completed its mitigation plan.

Should you have any questions please contact me.

Respectfully,



Barry G. Pagel
Manager of Compliance
813-207-7968
813-289-5646 (fax)
bpagel@frcc.com

BP/gw

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment c

Record Documents for PRC-005-1 R2/2.1 (FRCC200900166) and PRC-005-1 R1 (FRCC200900167)

i. FRCC's Source Document Information dated December 3, 2010

ii. GRU's Mitigation Plan MIT-07-2590 submitted May 28, 2009

iii. GRU's Certification of Mitigation Plan Completion dated February 26, 2010 and submitted May 28, 2010

iv. FRCC's Verification of Mitigation Plan Completion dated June 7, 2010

FLORIDA RELIABILITY COORDINATING COUNCIL, INC.
1408 N. WESTSHORE BLVD., SUITE 1002
TAMPA, FLORIDA 33607-4512
PHONE 813.289.5644 • FAX 813.289.5646
WWW.FRCC.COM

SOURCE DOCUMENT INFORMATION
Dated 12/03/10

Registered Entity: Gainesville Regional Utility (GRU)
NERC Registry ID #: NCR00032
NERC #: FRCC200900166

	STANDARD NUMBER	REQUIREMENT	DISCOVERY	DISCOVERY DATE	FINDING
1	PRC-005-1	2	Audit	4/24/09	**(R2) GRU failed to provide evidence that ten of the Protection System devices were maintained and tested within the defined intervals from 6/18/07 to 11/15/07.**

Registered Entity: Gainesville Regional Utility (GRU)
NERC Registry ID #: NCR00032
NERC #: FRCC200900167

	STANDARD NUMBER	REQUIREMENT	DISCOVERY	DISCOVERY DATE	FINDING
1	PRC-005-1	1	Audit	4/24/09	**(R1) Gainesville Regional Utilities (GRU) PRC documents provided were insufficient to demonstrate that the Protection System maintenance and testing program for Protection System that affects the Bulk Electric System included an interval for the maintenance and testing of associated communication systems, DC control circuitry, and voltage and current sensing devices from June 18, 2007 until July 30, 2008. Also, the documents provided were insufficient to demonstrate that the Protection System maintenance and testing program for Protection System that affects the Bulk Electric System included an interval for the maintenance and testing of transmission station batteries from June 18, 2007 until September 11, 2008.** **In addition, the documents provided were insufficient to demonstrate that**

					the Protection System maintenance and testing program for Protection System that affects the Bulk Electric System included a summary of maintenance and testing procedures for associated communication systems, DC control circuitry, and voltage and current sensing devices from June 18, 2007 until July 30, 2008. Also the document provided was insufficient to demonstrate that the Protection System maintenance and testing program for Protection System that affects the Bulk Electric System included a summary of maintenance and testing procedures for associated communication systems and voltage and current sensing devices from March 1, 2009. Also the documents provided were insufficient to demonstrate Protection System maintenance and testing program for Protection System that affects the Bulk Electric System included a summary of maintenance and testing procedures for transmission station batteries from June 18, 2007 until August 7, 2008.

Mitigation Plan Submittal Form

Date this Mitigation Plan is being submitted: May 28, 2009

Section A: Compliance Notices & Mitigation Plan Requirements

A.1 Notices and requirements applicable to Mitigation Plans and this Submittal Form are set forth in "Attachment A - Compliance Notices & Mitigation Plan Requirements" to this form.

A.2 ☒ I have reviewed Attachment A and understand that this Mitigation Plan Submittal Form will not be accepted unless this box is checked.

Section B: Registered Entity Information

B.1 Identify your organization:

Company Name: Gainesville Regional Utilities
Company Address: P.O. Box 147117 E37 Gainesville, Fl 32614-7117
NERC Compliance Registry ID: NCR00032

B.2 Identify the individual in your organization who will be the Entity Contact regarding this Mitigation Plan.

Name: Ken Simmons
Title: Systems Control Manager
Email: simmonskm@gru.com
Phone: 352-393-6412

Section C: Identification of Alleged or Confirmed Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following Alleged or Confirmed violation(s) of the reliability standard listed below.

Applicable Standard, Requirement(s) and dates:

NERC Violation ID #	Reliability Standard	Requirement Number	Violation Risk Factor	Alleged or Confirmed Violation Date(*)	Method of Detection (*e.g.*, Audit, Self-report, Investigation)
FRCC200900166	PRC-005-1	R2	Unknown	6/18/2007	Compliance Audit
FRCC200900167	PRC-005-1	R1	Unknown	6/18/2007	Compliance Audit

(*) Note: The Alleged or Confirmed Violation Date shall be expressly specified by Registered Entity, and subject to modification by the FRCC, as: (i) the date the Alleged or Confirmed violation occurred; (ii) the date that the Alleged or Confirmed violation was self-reported; or (iii) the date that the Alleged or Confirmed violation has been deemed to have occurred on by the FRCC. Questions regarding the date to use should be directed to the FRCC contact identified in Section G of this form.

C.2 Identify the cause of the Alleged or Confirmed violation(s) identified above. Additional detailed information may be provided as an attachment:

FRCC200900166 PRC-005-1 R2

A. Evidence indicates that protective relays were out of established intervals from June 18, 2007 thru November 15, 2007.

B. Evidence indicates that transmission station batteries were out of established intervals during October and November 2008.

C. Evidence for station batteries and other components for the Generation Protective System were not supplied.

FRCC200900167 PRC-005-1 R1

A. Missing Basis for maintenance and testing intervals of associated communication systems, DC control circuitry, and voltage and current sensing devices from June 18, 2007 until March 1, 2009

B. Missing Basis for the maintenance and testing intervals of transmission station batteries from June 18, 2007 until September 11, 2008.

C. Missing interval for maintenance and testing of associated communication systems, DC control circuitry, and voltage and current sensing devices from June 18, 2007 until July 30, 2008

D. Missing interval for the maintenance and testing of transmission station batteries from June 18, 2007 until September 11, 2008.

E. **Missing summary of maintenance and testing procedures for associated communication systems, DC control circuitry, and voltage and current sensing devices from June 18, 2007 until July 30, 2008**
F. **Missing summary of maintenance and testing procedures for associated communication systems and voltage and current sensing devices from March 1, 2009**
G. **Missing summary of maintenance and testing procedures for transmission station batteries from June 18, 2007 until August 7, 2008.**
H. **In addition, GRU's PRC documents and evidence indicated the GRU generation Protective System Maintenance and Testing program has not been fully implemented**

C.3 Provide any additional relevant information regarding the Alleged or Confirmed violations associated with this Mitigation Plan. Additional detailed information may be provided as an attachment:

See attachment "PRC 005 Mitigation Plan Summary."

Section D: Details of Proposed Mitigation Plan

Mitigation Plan Contents

D.1 Identify and describe the action plan, including specific tasks and actions that your organization is proposing to undertake, or which it undertook if this Mitigation Plan has been completed, to correct the Alleged or Confirmed violations identified above in Part C.1 of this form. Additional detailed information may be provided as an attachment:

Please reference the Mitigation Plan Timeline and Milestones for details. The alleged violations regarding "basis" and "interval" have been corrected. The maintenance program documentation issues regarding maintenance procedure summaries will be corrected as noted. Documents will be revised and evidence will be provided that will indicate that the GRU generation protective system maintenance and testing program has been fully implemented.

The relays that were or are out of established intervals have been or will be tested according to the mitigation plan. To prevent future reoccurrences, a monthly work order will be generated to require a monthly review of all outstanding maintenance work orders to ensure compliance. Documentation is attached to show that the transmission station batteries are in compliance.

On March 1, 2009, it was decided not to depend strictly on condition based monitoring of the DC control circuits, current and voltage sensing devices and, part of the associated communication systems. Instead, a time based interval was added to these devices to ensure reliability. To aid in transition to this new approach, the effected devices will be tested or verified for proper operation over the next twelve months then placed on an interval as indicated in the maintenance and test program. All alleged violations will be fully mitigated when the Mitigation Plan is complete.

Mitigation Plan Timeline and Milestones

D.2 Provide the date by which full implementation of the Mitigation Plan will be, or has been, completed with respect to the Alleged or Confirmed violations identified above. State whether the Mitigation Plan has been fully implemented: June 1, 2010.

D.3 Enter Milestone Activities, with due dates, that your organization is proposing, or has completed, for this Mitigation Plan:

Milestone Activity (referenced alleged violation in parenthesis)	Proposed/Actual Completion Date* (shall not be more than 3 months apart)
Basis Documented for testing intervals of associated communications systems, DC control circuitry, and voltage and current sensing devices (R1-A)	Complete March 1, 2009/March 1, 2009
Basis Documented for testing intervals of transmission station batteries (R1-B)	Complete September 11, 2008/September 11, 2008
Interval Documented for maintenance and testing of associated communication systems, DC control circuitry, and voltage and current sensing devices (R1-C)	Complete July 30, 2008/ July 30, 2008
Intervals documented for the maintenance and testing of transmission station batteries (R1-D)	Complete September 11, 2008/September 11, 2008
Document Summary of maintenance and testing procedures for associated communication systems, DC control circuitry and voltage and current sensing devices. (R1-E)	Complete July 30, 2008/ July 30, 2008
Document Summary of maintenance and testing procedures for associated communication systems and voltage and	To be completed by June 30, 2009 (necessary due to procedure revision dated March 1, 2009)

current sensing devices. (R1-F)	
Document summary of maintenance and testing procedures for transmission station batteries (R1-G)	Complete August 7, 2008/August 7, 2008
Revise maintenance program to clarify full implementation of the generation protection system maintenance and testing program (R1-H)	To be completed by July 1, 2009
Provide last test date and next due date of all protective relays to show all are now in compliance. Test all relays found out of compliance (R2-A)	To be completed by July 1, 2009 Affected relays are noted on sheets "Relays ID'ed During Audit" and "Relays ID'ed After Audit" in attachment "PRC 005 Mitigation Plan Summary."
Provide data to show all transmission station batteries were inspected (Monthly Inspection) within their defined intervals during October and November 2008 (R2-B)	Completed November 2008, evidence attached with this submittal (See attachment "PRC 005 Mitigation Plan Summary" Sheet "BATTERYLIST_9_12_08"
Provide evidence to show full implementation of the maintenance and testing program for the generation batteries and other components of the generation protective system (R2-C)	To be completed by July 1, 2009
Create monthly work order to require monthly review by management or designee to ensure timely completion of all protection system maintenance (Program enhancement)	To be completed by July 1, 2009
Provide evidence that all associated communications, voltage and current sensing devices and DC control circuits are within the intervals defined in the GRU Testing and Maintenance Program (Program enhancement)	25% Complete August 31, 2009 50% Complete November 30, 2009 75% Complete February 28, 2010 100% May 31, 2010

(*) Note: Implementation milestones no more than three (3) months apart are permissible only for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

Section E: Interim and Future Reliability Risk

Abatement of Interim BPS Reliability Risk

E.1 While your organization is implementing this Mitigation Plan the reliability of the Bulk Power System (BPS) may remain at higher risk or be otherwise negatively impacted until the plan is successfully completed. To the extent they are, or may be, known or anticipated: (i) identify any such risks or impacts; and (ii) discuss any actions that your organization is planning to take to mitigate this increased risk to the reliability of the BPS. Additional detailed information may be provided as an attachment:

There is very little remaining impact to the reliability of the bulk power system. The only issues that remain to be mitigated are very minor in nature. In the mitigation plan, we will provide documentation that the maintenance and testing program for the generation system was fully implemented. Although we will develop additional time-based maintenance and testing procedures for associated communication systems and voltage and current sensing devices; these devices will still be monitored. No interim action is deemed necessary.

We conducted a very thorough post audit review of all the relays associated with protecting the BPS and noted that the relays associated with two lines had conflicting documentation of whether they had been tested (Line 1 and Line 8). Further investigation showed that some are due a formal relay test due to a clerical error. They have been scheduled to be tested June 2009. These lines are part of a looped system so loss of either line will not impact the BPS. Line 8 differential relaying was function tested February 12, 2009. Line 1 relaying was operated via SCADA on July 11, 2007. Both lines are relayed via microprocessor type relays. No failures that have been discovered during testing of these types of relays. Since failure of the relays is very unlikely, the two lines have minor impact to the BPS, and since the relays will be tested within thirty days, no interim action is deemed necessary.

Prevention of Future BPS Reliability Risk

E.2 Describe how successful completion of this Mitigation Plan will prevent or minimize the probability that your organization incurs further risk or Alleged violations of the same or similar reliability standards requirements in the future. Additional detailed information may be provided as an attachment:

Revised procedures will help clarify responsibilities and improve communication among the two operating areas, Energy Delivery and Energy

Supply. New procedures will insure that a monthly review will be conducted to ensure that the program remains on schedule. These changes and the other additional enhancements that are discussed in the mitigation plan will minimize the probability of future alleged violations and minimize the risk to the BPS.

Section F: Authorization

An authorized individual must sign and date this Mitigation Plan Submittal Form. By doing so, this individual, on behalf of your organization:

a) Submits this Mitigation Plan for acceptance by the FRCC and approval by NERC, and

b) If applicable, certifies that this Mitigation Plan was completed on or before the date provided as the 'Date of Completion of the Mitigation Plan' on this form, and

c) Acknowledges:

1. I am Systems Control Manager of Gainesville regional Utilities (GRU)

2. I am qualified to sign this Mitigation Plan on behalf of GRU

3. I understand GRU's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure, including Appendix 4(C) (Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation" (NERC CMEP)).

3. I have read and am familiar with the contents of this Mitigation Plan.

4. GRU agrees to comply with, this Mitigation Plan, including the timetable completion date, as accepted by the FRCC and approved by NERC.

Authorized Individual Signature _____

Name (Print): Ken Simmons
Title: Systems Control Manager
Date: May 28, 2009

Section G: Regional Entity Contact

Please direct any questions regarding completion of this form to:

Madeline Alba, FRCC Compliance Program Administrator
813-207-7965
malba@frcc.com

Attachment A – Compliance Notices & Mitigation Plan Requirements

I. Section 6.2 of the CMEP[1] sets forth the information that must be included in a Mitigation Plan. The Mitigation Plan must include:

(1) The Registered Entity's point of contact for the Mitigation Plan, who shall be a person (i) responsible for filing the Mitigation Plan, (ii) technically knowledgeable regarding the Mitigation Plan, and (iii) authorized and competent to respond to questions regarding the status of the Mitigation Plan. This person may be the Registered Entity's point of contact described in Section 2.0.

(2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.

(3) The cause of the Alleged or Confirmed Violation(s).

(4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).

(5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).

(6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.

(7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.

(8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

(9) Any other information deemed necessary or appropriate.

(10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self-Certification or Self Reporting submittals.

II. This submittal form must be used to provide a required Mitigation Plan for review and acceptance by the FRCC and approval by NERC.

III. This Mitigation Plan is submitted to the FRCC and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.

---

[1] "*Uniform Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation*;" a copy of the current version approved by the Federal Energy Regulatory Commission is posted on NERC's website.

IV. This Mitigation Plan Submittal Form may be used to address one or more related Alleged or Confirmed violations of one Reliability Standard. A separate mitigation plan is required to address Alleged or Confirmed violations with respect to each additional Reliability Standard, as applicable.

V. If the Mitigation Plan is accepted by the FRCC and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission in accordance with applicable Commission rules, regulations and orders.

VI. The FRCC or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.

VII. Remedial action directives also may be issued as necessary to ensure reliability of the BPS.

Mitigation Plan Submittal Form

Date this Mitigation Plan is being submitted: May 28, 2009
Milestone update #1 July 2, 2009
Milestone update #2 August 31, 2009
Milestone update #3 November 30, 2009
Milestone update #4 February 25, 2010 Complete

Section A: Compliance Notices & Mitigation Plan Requirements

A.1 Notices and requirements applicable to Mitigation Plans and this Submittal Form are set forth in "Attachment A - Compliance Notices & Mitigation Plan Requirements" to this form.

A.2 ☒ I have reviewed Attachment A and understand that this Mitigation Plan Submittal Form will not be accepted unless this box is checked.

Section B: Registered Entity Information

B.1 Identify your organization:

Company Name: Gainesville Regional Utilities
Company Address: P.O. Box 147117
NERC Compliance Registry ID: NCR00032

B.2 Identify the individual in your organization who will be the Entity Contact regarding this Mitigation Plan.

Name: Ken Simmons
Title: Systems Control Manager
Email: simmonskm@gru.com
Phone: 352-393-6412

Section C: Identification of Alleged or Confirmed Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following Alleged or Confirmed violation(s) of the reliability standard listed below.

Applicable Standard, Requirement(s) and dates:

NERC Violation ID #	Reliability Standard	Requirement Number	Violation Risk Factor	Alleged or Confirmed Violation Date(*)	Method of Detection (*e.g.*, Audit, Self-report, Investigation)
FRCC200900166	PRC-005-1	R2	Unknown	6/18/2007	Compliance Audit
FRCC200900167	PRC-005-1	R1	Unknown	6/18/2007	Compliance Audit

(*) Note: The Alleged or Confirmed Violation Date shall be expressly specified by Registered Entity, and subject to modification by the FRCC, as: (i) the date the Alleged or Confirmed violation occurred; (ii) the date that the Alleged or Confirmed violation was self-reported; or (iii) the date that the Alleged or Confirmed violation has been deemed to have occurred on by the FRCC. Questions regarding the date to use should be directed to the FRCC contact identified in Section G of this form.

C.2 Identify the cause of the Alleged or Confirmed violation(s) identified above. Additional detailed information may be provided as an attachment:

FRCC200900166 PRC-005-1 R2

A. Evidence indicates that protective relays were out of established intervals from June 18, 2007 thru November 15, 2007.

B. Evidence indicates that transmission station batteries were out of established intervals during October and November 2008.

C. Evidence for station batteries and other components for the Generation Protective System were not supplied.

FRCC200900167 PRC-005-1 R1

A. Missing Basis for maintenance and testing intervals of associated communication systems, DC control circuitry, and voltage and current sensing devices from June 18, 2007 until March 1, 2009

B. Missing Basis for the maintenance and testing intervals of transmission station batteries from June 18, 2007 until September 11, 2008.

C. Missing interval for maintenance and testing of associated communication systems, DC control circuitry, and voltage and current sensing devices from June 18, 2007 until July 30, 2008

D. Missing interval for the maintenance and testing of transmission station batteries from June 18, 2007 until September 11, 2008.

E. Missing summary of maintenance and testing procedures for associated communication systems, DC control circuitry, and voltage and current sensing devices from June 18, 2007 until July 30, 2008

F. Missing summary of maintenance and testing procedures for associated communication systems and voltage and current sensing devices from March 1, 2009

G. Missing summary of maintenance and testing procedures for transmission station batteries from June 18, 2007 until August 7, 2008.

H. In addition, GRU's PRC documents and evidence indicated the GRU generation Protective System Maintenance and Testing program has not been fully implemented

C.3 Provide any additional relevant information regarding the Alleged or Confirmed violations associated with this Mitigation Plan. Additional detailed information may be provided as an attachment:

See attachment "PRC 005 Mitigation Plan Summary."

Section D: Details of Proposed Mitigation Plan

Mitigation Plan Contents

D.1 Identify and describe the action plan, including specific tasks and actions that your organization is proposing to undertake, or which it undertook if this Mitigation Plan has been completed, to correct the Alleged or Confirmed violations identified above in Part C.1 of this form. Additional detailed information may be provided as an attachment:

Please reference the Mitigation Plan Timeline and Milestones for details. The alleged violations regarding "basis" and "interval" have been corrected. The maintenance program documentation issues regarding maintenance procedure summaries will be corrected as noted. Documents will be revised and evidence will be provided that will indicate that the GRU generation protective system maintenance and testing program has been fully implemented.

The relays that were or are out of established intervals have been or will be tested according to the mitigation plan. To prevent future reoccurrences, a monthly work order will be generated to require a monthly review of all outstanding maintenance work orders to ensure compliance. Documentation is attached to show that the transmission station batteries are in compliance. On March 1, 2009, it was decided not to depend strictly on condition based monitoring of the DC control circuits, current and voltage sensing devices and, part of the associated communication systems. Instead, a time based interval was added to these devices to ensure reliability. To aid in transition to this new approach, the effected devices will be tested or verified for proper operation over the next twelve months then placed on an interval as indicated in the maintenance and test program. All alleged violations will be fully mitigated when the Mitigation Plan is complete.

Mitigation Plan Timeline and Milestones

D.2 Provide the date by which full implementation of the Mitigation Plan will be, or has been, completed with respect to the Alleged or Confirmed violations identified above. State whether the Mitigation Plan has been fully implemented: June 1, 2010.

D.3 Enter Milestone Activities, with due dates, that your organization is proposing, or has completed, for this Mitigation Plan:

Milestone Activity (referenced alleged violation in parenthesis)	Proposed/Actual Completion Date* (shall not be more than 3 months apart)
Basis Documented for testing intervals of associated communications systems, DC control circuitry, and voltage and current sensing devices (R1-A)	Complete March 1, 2009/March 1, 2009
Basis Documented for testing intervals of transmission station batteries (R1-B)	Complete September 11, 2008/September 11, 2008
Interval Documented for maintenance and testing of associated communication systems, DC control circuitry, and voltage and current sensing devices (R1-C)	Complete July 30, 2008/ July 30, 2008
Intervals documented for the maintenance and testing of transmission station batteries (R1-D)	Complete September 11, 2008/September 11, 2008
Document Summary of maintenance and testing procedures for associated	Complete July 30, 2008/ July 30, 2008

communication systems, DC control circuitry and voltage and current sensing devices. (R1-E)	
Document Summary of maintenance and testing procedures for associated communication systems and voltage and current sensing devices. (R1-F)	***** Completed on June 29, 2009, Procedures were clarified– "GRU Prot Sys Maint & Test Prog 6-29-09 R6.Doc" ***** June 30, 2009/June 29, 2009 (see above)
Document summary of maintenance and testing procedures for transmission station batteries (R1-G)	Complete August 7, 2008/August 7, 2008
Revise maintenance program to clarify full implementation of the generation protection system maintenance and testing program (R1-H)	***** Completed on June 29, 2009, Procedures were clarified– "GRU Prot Sys Maint & Test Prog 6-29-09 R6.Doc" Clarified generation battery procedure " GRU Generation Stat Btry Maint Test Prog Adopt 6_25_09.doc" ***** July 1, 2009/June 29, 2009 (see above)
Provide last test date and next due date of all protective relays to show all are now in compliance. Test all relays found out of compliance (R2-A)	***** Completed on June 30, 2009, "Master Priority List June 30, 2009"as evidence – "PRIORITY RELAY LIST SUBMITTED TO FRCC 6-30-09.xls" ***** July 1, 2009/June 30, 2009 (see above)
Provide data to show all transmission station batteries were inspected (Monthly Inspection) within their defined intervals during Oct. and Nov. 2008 (R2-B)	Complete May 27, 2009/May 27, 2009
Provide evidence to show full implementation of the maintenance and testing program for the generation batteries and other components of the generation protective system (R2-C)	***** Completed on June 29, 2009, spreadsheet with annual and monthly maintenance dates of Generation Station Batteries– "NERC Documentation of Battery PMs Generation Stations.xls" Also, spreadsheet with test and maintenance dates of all relays and other components of generation protective system – "PRIORITY RELAY LIST WITH ASSOCIATED COMPONENT TESTS 6-30-09.xls" *****

	July 1, 2009/June 29, 2009(See above)
Create monthly work order to require monthly review by management or designee to ensure timely completion of all protection system maintenance (Program enhancement)	***** Completed on June 29, 2009, Workorder as evidence – "7_1_09 REVIEW OF BES MAINT.pdf" ***** July 1, 2009, June 29,2009
Provide evidence that all associated communications, voltage and current sensing devices and DC control circuits are within the intervals defined in the GRU Testing and Maintenance Program (Program enhancement)	***** Completed on February 25, 2010** 25% Complete **August 31, 2009, August 27, 2009** **As of August 27, 2009, 76% of all of the components have been tested** **"Priority Relay Assembly Tests 08_27_09.PDF" for details.** 50% Complete **Nov 30, 2009, Nov 30, 2009** **As of Nov 30, 2009, 86% of all of the components have been tested (410 of 477 components tested).** **"Priority Relay Assembly Tests 11_30_09.PDF" for details.** **75% Complete** **Feb 28, 2010, Feb 25, 2010** **As of Feb 25, 2010, 100% of all of the components have been tested (482 of 482 components tested).** **"Priority Relay Assembly Tests 2/25/2010.PDF" for details.** **100% Complete** **May 31, 2010, Feb 25, 2010** **See above Mitigation Plan Complete**

(*) Note: Implementation milestones no more than three (3) months apart are permissible only for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

Section E: Interim and Future Reliability Risk

Abatement of Interim BPS Reliability Risk

E.1 While your organization is implementing this Mitigation Plan the reliability of the Bulk Power System (BPS) may remain at higher risk or be otherwise negatively impacted until the plan is successfully completed. To the extent they are, or may be, known or anticipated: (i) identify any such risks or impacts; and (ii) discuss any actions that your organization is planning to take to mitigate this increased risk to the reliability of the BPS. Additional detailed information may be provided as an attachment:

There is very little remaining impact to the reliability of the bulk power system. The only issues that remain to be mitigated are very minor in nature. In the mitigation plan, we will provide documentation that the maintenance and testing program for the generation system was fully implemented. Although we will develop additional time-based maintenance and testing procedures for associated communication systems and voltage and current sensing devices; these devices will still be monitored. No interim action is deemed necessary.

We conducted a very thorough post audit review of all the relays associated with protecting the BPS and noted that the relays associated with two lines had conflicting documentation of whether they had been tested (Line 1 and Line 8). Further investigation showed that some are due a formal relay test due to a clerical error. They have been scheduled to be tested June 2009. These lines are part of a looped system so loss of either line will not impact the BPS. Line 8 differential relaying was function tested February 12, 2009. Line 1 relaying was operated via SCADA on July 11, 2007. Both lines are relayed via microprocessor type relays. No failures that have been discovered during testing of these types of relays. Since failure of the relays is very unlikely, the two lines have minor impact to the BPS, and since the relays will be tested within thirty days, no interim action is deemed necessary.

Prevention of Future BPS Reliability Risk

E.2 Describe how successful completion of this Mitigation Plan will prevent or minimize the probability that your organization incurs further risk or Alleged violations of the same or similar reliability standards requirements in the future. Additional detailed information may be provided as an attachment:

Revised procedures will help clarify responsibilities and improve communication among the two operating areas, Energy Delivery and Energy

Supply. New procedures will insure that a monthly review will be conducted to insure that the program remains on schedule. These changes and the other additional enhancements that are discussed in the mitigation plan will minimize the probability of future alleged violations and minimize the risk to the BPS.

Section F: Authorization

An authorized individual must sign and date this Mitigation Plan Submittal Form. By doing so, this individual, on behalf of your organization:

a) Submits this Mitigation Plan for acceptance by the FRCC and approval by NERC, and

b) If applicable, certifies that this Mitigation Plan was completed on or before the date provided as the 'Date of Completion of the Mitigation Plan' on this form, and

c) Acknowledges:

1. I am Systems Control Manager of Gainesville regional Utilities (GRU)

2. I am qualified to sign this Mitigation Plan on behalf of GRU

3. I understand GRU's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure, including Appendix 4(C) (Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation" (NERC CMEP)).

3. I have read and am familiar with the contents of this Mitigation Plan.

4. GRU agrees to comply with, this Mitigation Plan, including the timetable completion date, as accepted by the FRCC and approved by NERC.

Authorized Individual Signature _____

Name (Print): Ken Simmons
Title: Systems Control Manager
Date: February 26, 2010

Section G: Regional Entity Contact

Please direct any questions regarding completion of this form to:

Madeline Alba, FRCC Compliance Program Administrator
813-207-7965
malba@frcc.com

Attachment A – Compliance Notices & Mitigation Plan Requirements

I. Section 6.2 of the CMEP[1] sets forth the information that must be included in a Mitigation Plan. The Mitigation Plan must include:

(1) The Registered Entity's point of contact for the Mitigation Plan, who shall be a person (i) responsible for filing the Mitigation Plan, (ii) technically knowledgeable regarding the Mitigation Plan, and (iii) authorized and competent to respond to questions regarding the status of the Mitigation Plan. This person may be the Registered Entity's point of contact described in Section 2.0.

(2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.

(3) The cause of the Alleged or Confirmed Violation(s).

(4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).

(5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).

(6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.

(7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.

(8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

(9) Any other information deemed necessary or appropriate.

(10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self-Certification or Self Reporting submittals.

II. This submittal form must be used to provide a required Mitigation Plan for review and acceptance by the FRCC and approval by NERC.

III. This Mitigation Plan is submitted to the FRCC and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.

---

[1] "*Uniform Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation*;" a copy of the current version approved by the Federal Energy Regulatory Commission is posted on NERC's website.

IV. This Mitigation Plan Submittal Form may be used to address one or more related Alleged or Confirmed violations of one Reliability Standard. A separate mitigation plan is required to address Alleged or Confirmed violations with respect to each additional Reliability Standard, as applicable.

V. If the Mitigation Plan is accepted by the FRCC and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission in accordance with applicable Commission rules, regulations and orders.

VI. The FRCC or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.

VII. Remedial action directives also may be issued as necessary to ensure reliability of the BPS.

FLORIDA RELIABILITY COORDINATING COUNCIL, INC.
1408 N. WESTSHORE BLVD., SUITE 1002
TAMPA, FLORIDA 33607-4512
PHONE 813.289.5644 • FAX 813.289.5646
WWW.FRCC.COM

VIA E-MAIL

June 7, 2010

Mr. Ken Simmons
Systems Control Manager
Gainesville Regional Utilities
P.O. Box 147117 E37
Gainesville, FL 32614-7117

RE: Gainesville Regional Utilities (GRU) Mitigation Plan – Violations of NERC Standards:

- **PRC-005-1 R1 FRCC200900166 Mitigation Plan dated 5/28/2009**
- **PRC-005-1 R2 FRCC200900167 Mitigation Plan dated 5/28/2009**

Dear Mr. Simmons,

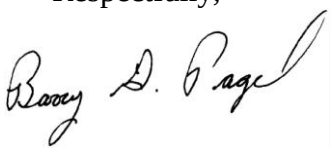
The mitigation plan submitted by Gainesville Regional Utilities (GRU), for the above referenced violations has been received by the Florida Reliability Coordinating Council, Inc. (FRCC). After review, the FRCC finds the mitigation plan for the above referenced violations to be acceptable and completed.

The FRCC will forward the submitted mitigation plan to the North American Electric Reliability Corporation (NERC) for its review and approval, and NERC will send this mitigation plan to the Federal Energy Regulatory Commission as confidential non-public information.

The FRCC will also notify NERC that GRU has completed its mitigation plan.

If you have any questions, feel free to contact me at 813-207-7968.

Respectfully,



Barry Pagel
Director of Compliance
bpagel@frcc.com

BP/rr

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment d

Record Documents for PRC-005-1 R2/2.1 (FRCC200900174)

i. GRU's Self-Report dated April 8, 2009

ii. GRU's Mitigation Plan MIT-09-1727 submitted May 7, 2009

iii. GRU's Certification of Mitigation Plan Completion dated May 7, 2009

iv. FRCC's Verification of Mitigation Plan Completion dated May 27, 2009

FRCC Compliance Self Reporting Form

Registered Entity _____*Gainesville Regional Utilities*_____

Date of Violation: Month _*March*___ Day ____*2nd*_____ Year __*2008*___

Time of Violation _*3 months 23 days*_____
(As appropriate, based upon the time frame associated with the reliability standard)

For EACH violation, please provide the following:

1. The Reliability Standard and requirement violated. *PRC-005-1 Requirement 2*

2. Violation Severity Level. *Undetermined*

3. The specifics of the violation and the reliability impact of the violation to the bulk power system. *On 04/08/2009 the transmission relay KATMSRLY1301A was found to be out of test interval from 03/02/2008 to 06/23/2008. The relay was tested on 6/23/08. Test results showed the relay to be fully functional. There was no impact on the BES.*

4. Company contact persons name, title, and contact number(s).
   Ken Simmons, Systems Control Manager, 352-393-6412

5. Describe any confidentiality issues
   N/A

6. Actions taken or to be taken (include timetable) to ensure violation is corrected. Attach completed Mitigation Plan if appropriate.

   The out of interval relay has been tested and is presently in compliance with PRC-005-1 Requirement 2 as of 06/24/2009.

Additional Comments: ☐ Comments attached.

Submitted by: Ken Simmons

Title: Systems Control Manager

Please send your completed form to compliancemanager@frcc.com

Mitigation Plan Submittal Form

Date this Mitigation Plan is being submitted: 4/8/09 – **Revised 5/7/09**

Section A: Compliance Notices & Mitigation Plan Requirements

A.1 Notices and requirements applicable to Mitigation Plans and this Submittal Form are set forth in "Attachment A - Compliance Notices & Mitigation Plan Requirements" to this form.

A.2 ☒ I have reviewed Attachment A and understand that this Mitigation Plan Submittal Form will not be accepted unless this box is checked.

Section B: Registered Entity Information

B.1 Identify your organization:

Company Name: Gainesville Regional Utilities
Company Address: P.O. Box 147117 E37
NERC Compliance Registry ID: NCR00032

B.2 Identify the individual in your organization who will be the Entity Contact regarding this Mitigation Plan.

Name: Ken Simmons
Title: Systems Control Manager
Email: simmonskm@gru.com
Phone: 352-393-6412

Section C: Identification of Alleged or Confirmed Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following Alleged or Confirmed violation(s) of the reliability standard listed below.

Applicable Standard, Requirement(s) and dates:

NERC Violation ID #	Reliability Standard	Requirement Number	Violation Risk Factor	Alleged or Confirmed Violation Date(*)	Method of Detection (*e.g.*, Audit, Self-report, Investigation)
aaaaaYYY Ynnnnn		Rn.n.n		MM/DD/YY	
?	PRC-005-1	R2	High	03/01/08	Self-Report

(*) Note: The Alleged or Confirmed Violation Date shall be expressly specified by Registered Entity, and subject to modification by the FRCC, as: (i) the date the Alleged or Confirmed violation occurred; (ii) the date that the Alleged or Confirmed violation was self-reported; or (iii) the date that the Alleged or Confirmed violation has been deemed to have occurred on by the FRCC. Questions regarding the date to use should be directed to the FRCC contact identified in Section G of this form.

C.2 Identify the cause of the Alleged or Confirmed violation(s) identified above. Additional detailed information may be provided as an attachment:

*The transmission relay **SRSRKADTSRLY1301A** was found to be out of test interval from **3/1/08** to **6/24/08**.*

C.3 Provide any additional relevant information regarding the Alleged or Confirmed violations associated with this Mitigation Plan. Additional detailed information may be provided as an attachment:

Although the relay was tested out of the interval, it was found to be fully functional. There was no impact on the reliability of the BPS.

Section D: Details of Proposed Mitigation Plan

Mitigation Plan Contents

D.1 Identify and describe the action plan, including specific tasks and actions that your organization is proposing to undertake, or which it undertook if this Mitigation Plan has been completed, to correct the Alleged or Confirmed violations identified above in Part C.1 of this form. Additional detailed information may be provided as an attachment:

The out of interval relay has been tested and is presently in compliance with PRC-005-1 Requirement 2 as of 6/24/2008.

Mitigation Plan Timeline and Milestones

D.2 Provide the date by which full implementation of the Mitigation Plan will be, or has been, completed with respect to the Alleged or Confirmed violations identified above. State whether the Mitigation Plan has been fully implemented: *The mitigation plan has been fully implemented as of 6/24/08.*

D.3 Enter Milestone Activities, with due dates, that your organization is proposing, or has completed, for this Mitigation Plan:

Milestone Activity	Proposed/Actual Completion Date* (shall not be more than 3 months apart)
Test out of interval priority relay.	*6/24/2008*

(*) Note: Implementation milestones no more than three (3) months apart are permissible only for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

Section E: Interim and Future Reliability Risk

Abatement of Interim BPS Reliability Risk

E.1 While your organization is implementing this Mitigation Plan the reliability of the Bulk Power System (BPS) may remain at higher risk or be otherwise negatively impacted until the plan is successfully completed. To the extent they are, or may be, known or anticipated: (i) identify any such risks or impacts; and (ii) discuss any actions that your organization is planning to take to mitigate this increased risk to the reliability of the BPS. Additional detailed information may be provided as an attachment:

N/A - Violation occurred in the past and has been mitigated.

Prevention of Future BPS Reliability Risk

E.2 Describe how successful completion of this Mitigation Plan will prevent or minimize the probability that your organization incurs further risk or Alleged violations of the same or similar reliability standards requirements in the future. Additional detailed information may be provided as an attachment:

Review all priority relay schedules. Schedule and perform test and maintenance within the prescribed intervals.

Section F: Authorization

An authorized individual must sign and date this Mitigation Plan Submittal Form. By doing so, this individual, on behalf of your organization:

a) Submits this Mitigation Plan for acceptance by the FRCC and approval by NERC, and

b) If applicable, certifies that this Mitigation Plan was completed on or before the date provided as the 'Date of Completion of the Mitigation Plan' on this form, and

c) Acknowledges:

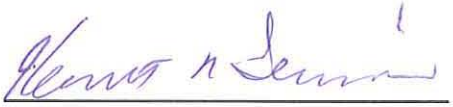
1. I am Systems Control Manager of GRU.

2. I am qualified to sign this Mitigation Plan on behalf of GRU.

3. I understand GRU's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure, including Appendix 4(C) (Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation" (NERC CMEP)).

3. I have read and am familiar with the contents of this Mitigation Plan.

4. GRU agrees to comply with, this Mitigation Plan, including the timetable completion date, as accepted by the FRCC and approved by NERC.

Authorized Individual Signature 

Name (Print): Kenneth M Simmons
Title: Systems Control Manager
Date: April 7, 2009

Section G: Regional Entity Contact

Please direct any questions regarding completion of this form to:

Madeline Alba, FRCC Compliance Program Administrator
813-207-7965
malba@frcc.com

Attachment A – Compliance Notices & Mitigation Plan Requirements

I. Section 6.2 of the CMEP[1] sets forth the information that must be included in a Mitigation Plan. The Mitigation Plan must include:

(1) The Registered Entity's point of contact for the Mitigation Plan, who shall be a person (i) responsible for filing the Mitigation Plan, (ii) technically knowledgeable regarding the Mitigation Plan, and (iii) authorized and competent to respond to questions regarding the status of the Mitigation Plan. This person may be the Registered Entity's point of contact described in Section 2.0.

(2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.

(3) The cause of the Alleged or Confirmed Violation(s).

(4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).

(5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).

(6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.

(7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.

(8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

(9) Any other information deemed necessary or appropriate.

(10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self-Certification or Self Reporting submittals.

II. This submittal form must be used to provide a required Mitigation Plan for review and acceptance by the FRCC and approval by NERC.

III. This Mitigation Plan is submitted to the FRCC and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.

---

[1] "*Uniform Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation*;" a copy of the current version approved by the Federal Energy Regulatory Commission is posted on NERC's website.

IV. This Mitigation Plan Submittal Form may be used to address one or more related Alleged or Confirmed violations of one Reliability Standard. A separate mitigation plan is required to address Alleged or Confirmed violations with respect to each additional Reliability Standard, as applicable.

V. If the Mitigation Plan is accepted by the FRCC and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission in accordance with applicable Commission rules, regulations and orders.

VI. The FRCC or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.

VII. Remedial action directives also may be issued as necessary to ensure reliability of the BPS.

FRCC Mitigation Plan Completion Form

Certification of a Completed Mitigation Plan

All Mitigation Plan Completion Certification submittals shall include data or information sufficient for FRCC to verify completion of the Mitigation Plan. FRCC may request such additional data or information and conduct follow-up assessments, on-site or other Spot Checking, or Compliance Audits as it deems necessary to verify that all required actions in the Mitigation Plan have been completed and the Registered Entity is in compliance with the subject Reliability Standard. (CMEP Section 6.6)

Registered Entity Information
Company Name: **Gainesville Regional Utilities**
Company Address: **P.O. Box 147117 E37, Gainesville Fl, 32614-7117**
NERC Compliance Registry ID (*if known*): **NCR 00032**

Date Original Mitigation Plan was submitted to FRCC: April 8, 2009
Date Revised Mitigation Plan was submitted to FRCC: May 7, 2009
Date Mitigation Plan was completed: June 24, 2008

Name of Standard and the Requirement(s) covered under the accepted Mitigation Plan: PRC-005-1 Transmission and Generation Protection System maintenance and Testing

NERC Violation ID # (*if known*):

Date of Certification: May 7, 2009

I certify that the mitigation plan for the above named alleged or confirmed violation has been completed on the date shown above, and that all information submitted information is complete and correct to the best of my knowledge.

Name: Ken Simmons
Title: Systems Control Manager
Email: simmonskm@gru.com
Phone: 352-393-6412
Authorized Individual Signature _____

To close out a completed Mitigation Plan, fill out this form, save and email it to compliancemanager@frcc.com.

FRCC

FRCC Mitigation Plan Completion Form

Certification of a Completed Mitigation Plan

All Mitigation Plan Completion Certification submittals shall include data or information sufficient for FRCC to verify completion of the Mitigation Plan. FRCC may request such additional data or information and conduct follow-up assessments, on-site or other Spot Checking, or Compliance Audits as it deems necessary to verify that all required actions in the Mitigation Plan have been completed and the Registered Entity is in compliance with the subject Reliability Standard. (CMEP Section 6.6)

Registered Entity Information
Company Name: **Gainesville Regional Utilities**
Company Address: **P.O. Box 147117 E37, Gainesville Fl, 32614-7117**
NERC Compliance Registry ID (*if known*): **NCR 00032**

Date Original Mitigation Plan was submitted to FRCC: April 8, 2009
Date Revised Mitigation Plan was submitted to FRCC: May 7, 2009
Date Mitigation Plan was completed: June 24, 2008

Name of Standard and the Requirement(s) covered under the accepted Mitigation Plan: PRC-005-1 Transmission and Generation Protection System maintenance and Testing

NERC Violation ID # (*if known*):

Date of Certification: May 7, 2009

I certify that the mitigation plan for the above named alleged or confirmed violation has been completed on the date shown above, and that all information submitted information is complete and correct to the best of my knowledge.

Name: Ken Simmons
Title: Systems Control Manager
Email: simmonskm@gru.com
Phone: 352-393-6412
Authorized Individual Signature 

To close out a completed Mitigation Plan, fill out this form, save and email it to compliancemanager@frcc.com.

FRCC
Florida Reliability Coordinating Council, Inc.

FLORIDA RELIABILITY COORDINATING COUNCIL, INC.
1408 N. WESTSHORE BLVD., SUITE 1002
TAMPA, FLORIDA 33607-4512
PHONE 813.289.5644 • FAX 813.289.5646
WWW.FRCC.COM

VIA E-MAIL

May 27, 2009

Mr. Ken Simmons
Systems Control Manager
Gainesville Regional Utilities
P.O. Box 147117 E37
Gainesville, FL 32614-7117

RE: Gainesville Regional Utilities (GRU)
Mitigation Plan – Self-Reported Violation
of NERC Standard PRC-005-1, R2
NERC ID #: FRCC200900174

Dear Mr. Simmons,

The mitigation plan submitted by Gainesville Regional Utilities (GRU), for the above referenced self-reported violation, has been received by the Florida Reliability Coordinating Council, Inc. (FRCC). After review, the FRCC accepts this mitigation plan for PRC-005-1, requirement 2. The FRCC will forward the submitted mitigation plan to the North American Electric Reliability Corporation (NERC) for its review and approval, and NERC will send them to the Federal Energy Regulatory Commission as confidential non-public information.

The FRCC has received the GRU signed mitigation plan completion form and supporting evidence, submitted May 7, 2009, in which GRU certified completion of its mitigation plan, completed May 7, 2009, for the above referenced standard and requirement. FRCC compliance staff has reviewed the submitted evidence and determined GRU has completed its mitigation plan.

The FRCC will notify NERC that GRU has completed its mitigation plan.

If you have any questions, feel free to contact me at 813-207-7968.

Respectfully,

Barry D. Pagel

Barry Pagel
Manager of Compliance
bpagel@frcc.com

BP:tb

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment e

Record Documents for PRC-008-0 R2 (FRCC200900309)

i. GRU's undated Self-Report submitted June 4, 2009

ii. GRU's Mitigation Plan MIT-09-2323 submitted June 4, 2009

iii. GRU's Certification of Mitigation Plan Completion dated June 4, 2009

iv. FRCC's Verification of Mitigation Plan Completion dated February 3, 2010

FRCC Compliance Self Reporting Form

Registered Entity Gainesville Regional Utilities

Date of Violation: March 31, 2009

Time of Violation 49 days
(As appropriate, based upon the time frame associated with the reliability standard)

For EACH violation, please provide the following:

1. The Reliability Standard and requirement violated.
   PRC-008-1 R2 Implementation and Documentation of Underfrequency Load Shedding Equipment Maintenance Program

2. Violation Severity Level.
   Undetermined

3. The specifics of the violation and the reliability impact of the violation to the bulk power system. Failed to test one under-frequency distribution relay SRSRIWDTSRLY1433A, Breaker 1433, within prescribed six year interval. No impact to the reliability of the BPS since relay tested correctly on May 19, 2009.

4. Company contact persons name, title, and contact number(s).
   Ken Simmons
   Systems Control Manager
   352-393-6412

5. Describe any confidentiality issues
   None

6. Actions taken or to be taken (include timetable) to ensure violation is corrected. Attach completed Mitigation Plan if appropriate.
   Underfrequency Relay was tested on May 19, 2009. No problems were found.

Additional Comments: ☒ Comments attached. See attached Mitigation Plan.

Submitted by: Ken Simmons

Title: Systems Control Manager

Please send your completed form to compliancemanager@frcc.com

Mitigation Plan Submittal Form

Date this Mitigation Plan is being submitted: June 4, 2009

Section A: Compliance Notices & Mitigation Plan Requirements

A.1 Notices and requirements applicable to Mitigation Plans and this Submittal Form are set forth in "Attachment A - Compliance Notices & Mitigation Plan Requirements" to this form.

A.2 ☒ I have reviewed Attachment A and understand that this Mitigation Plan Submittal Form will not be accepted unless this box is checked.

Section B: Registered Entity Information

B.1 Identify your organization:

Company Name: Gainesville Regional Utilities
Company Address: P.O. Box 147117 E37, Gainesville, Fl 32614-7117
NERC Compliance Registry ID: NCR00032

B.2 Identify the individual in your organization who will be the Entity Contact regarding this Mitigation Plan.

Name: Ken Simmons
Title: Systems Control Manager
Email: simmonskm@gru.com
Phone: 352-393-6412

Section C: Identification of Alleged or Confirmed Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following Alleged or Confirmed violation(s) of the reliability standard listed below.

Applicable Standard, Requirement(s) and dates:

NERC Violation ID #	Reliability Standard	Requirement Number	Violation Risk Factor	Alleged or Confirmed Violation Date(*)	Method of Detection (*e.g.*, Audit, Self-report, Investigation)
aaaaaYYY Ynnnnn	PRC-008-0	R2	Undetermined	03/31/2009	Self-report

(*) Note: The Alleged or Confirmed Violation Date shall be expressly specified by Registered Entity, and subject to modification by the FRCC, as: (i) the date the Alleged or Confirmed violation occurred; (ii) the date that the Alleged or Confirmed violation was self-reported; or (iii) the date that the Alleged or Confirmed violation has been deemed to have occurred on by the FRCC. Questions regarding the date to use should be directed to the FRCC contact identified in Section G of this form.

C.2 Identify the cause of the Alleged or Confirmed violation(s) identified above. Additional detailed information may be provided as an attachment:

Under frequency (UF) Relay SRSRIWDTSRLY1433A was tested out of the interval defined in GRU's Underfrequency Relay Maintenance Program.

C.3 Provide any additional relevant information regarding the Alleged or Confirmed violations associated with this Mitigation Plan. Additional detailed information may be provided as an attachment:

Clerical error of test date lead to failure to schedule relay test. Originally, the relay was scheduled to be tested by June 1, 2009 until error was noted.

Relay was originally tested March 2003. Due to six year testing interval, relay should have been tested March 1, 2009. Relay was tested May 19, 2009. Test sheets are attached (See "1433 test sheets.PDF").

Section D: Details of Proposed Mitigation Plan

Mitigation Plan Contents

D.1 Identify and describe the action plan, including specific tasks and actions that your organization is proposing to undertake, or which it undertook if this Mitigation Plan has been completed, to correct the Alleged or Confirmed

violations identified above in Part C.1 of this form. Additional detailed information may be provided as an attachment:

- Relay has been tested and results were satisfactory.
- Monthly work orders are now generated to review relay test statuses.
- Audited all under frequency relay test dates to verify compliance. The aforementioned relay was the only UF relay identified as out of compliance. Now all are in compliance.

Mitigation Plan Timeline and Milestones

D.2 Provide the date by which full implementation of the Mitigation Plan will be, or has been, completed with respect to the Alleged or Confirmed violations identified above. State whether the Mitigation Plan has been fully implemented: May 19, 2009, Fully implemented.

D.3 Enter Milestone Activities, with due dates, that your organization is proposing, or has completed, for this Mitigation Plan:

Milestone Activity	Proposed/Actual Completion Date* (shall not be more than 3 months apart)
Test Relay	Completed 05/19/2009

(*) Note: Implementation milestones no more than three (3) months apart are permissible only for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

FRCC
Florida Reliability Coordinating Council, Inc.

Section E: Interim and Future Reliability Risk

Abatement of Interim BPS Reliability Risk

E.1 While your organization is implementing this Mitigation Plan the reliability of the Bulk Power System (BPS) may remain at higher risk or be otherwise negatively impacted until the plan is successfully completed. To the extent they are, or may be, known or anticipated: (i) identify any such risks or impacts; and (ii) discuss any actions that your organization is planning to take to mitigate this increased risk to the reliability of the BPS. Additional detailed information may be provided as an attachment:

No impact on reliability. Relay was fully functional during time frame outside of testing interval.

Prevention of Future BPS Reliability Risk

E.2 Describe how successful completion of this Mitigation Plan will prevent or minimize the probability that your organization incurs further risk or Alleged violations of the same or similar reliability standards requirements in the future. Additional detailed information may be provided as an attachment:

Tested relay is now in compliance.

A comprehensive review of all under-frequency test sheets was conducted to determine if any other under-frequency relays were out of test interval. No additional relays were found out of compliance.

Monthly review of relay test statuses by management or designee will ensure that all relays will be tested within interval.

Section F: Authorization

An authorized individual must sign and date this Mitigation Plan Submittal Form. By doing so, this individual, on behalf of your organization:

a) Submits this Mitigation Plan for acceptance by the FRCC and approval by NERC, and

b) If applicable, certifies that this Mitigation Plan was completed on or before the date provided as the 'Date of Completion of the Mitigation Plan' on this form, and

c) Acknowledges:

1. I am Systems Control manager of Gainesville Regional Utilities

2. I am qualified to sign this Mitigation Plan on behalf of Gainesville Regional Utilities (GRU)

3. I understand GRU's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure, including Appendix 4(C) (Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation" (NERC CMEP)).

3. I have read and am familiar with the contents of this Mitigation Plan.

4. Gainesville Regional Utilities agrees to comply with, this Mitigation Plan, including the timetable completion date, as accepted by the FRCC and approved by NERC.

Authorized Individual Signature 

Name (Print): Ken Simmons
Title: Systems Control Manager
Date: May 28, 2009

Section G: Regional Entity Contact

Please direct any questions regarding completion of this form to:

Madeline Alba, FRCC Compliance Program Administrator
813-207-7965
malba@frcc.com

Attachment A – Compliance Notices & Mitigation Plan Requirements

I. Section 6.2 of the CMEP[1] sets forth the information that must be included in a Mitigation Plan. The Mitigation Plan must include:

(1) The Registered Entity's point of contact for the Mitigation Plan, who shall be a person (i) responsible for filing the Mitigation Plan, (ii) technically knowledgeable regarding the Mitigation Plan, and (iii) authorized and competent to respond to questions regarding the status of the Mitigation Plan. This person may be the Registered Entity's point of contact described in Section 2.0.

(2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.

(3) The cause of the Alleged or Confirmed Violation(s).

(4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).

(5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).

(6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.

(7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.

(8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

(9) Any other information deemed necessary or appropriate.

(10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self-Certification or Self Reporting submittals.

II. This submittal form must be used to provide a required Mitigation Plan for review and acceptance by the FRCC and approval by NERC.

III. This Mitigation Plan is submitted to the FRCC and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.

---

[1] "*Uniform Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation*;" a copy of the current version approved by the Federal Energy Regulatory Commission is posted on NERC's website.

IV. This Mitigation Plan Submittal Form may be used to address one or more related Alleged or Confirmed violations of one Reliability Standard. A separate mitigation plan is required to address Alleged or Confirmed violations with respect to each additional Reliability Standard, as applicable.

V. If the Mitigation Plan is accepted by the FRCC and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission in accordance with applicable Commission rules, regulations and orders.

VI. The FRCC or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.

VII. Remedial action directives also may be issued as necessary to ensure reliability of the BPS.

FRCC Mitigation Plan Completion Form

Certification of a Completed Mitigation Plan

All Mitigation Plan Completion Certification submittals shall include data or information sufficient for FRCC to verify completion of the Mitigation Plan. FRCC may request such additional data or information and conduct follow-up assessments, on-site or other Spot Checking, or Compliance Audits as it deems necessary to verify that all required actions in the Mitigation Plan have been completed and the Registered Entity is in compliance with the subject Reliability Standard. (CMEP Section 6.6)

Registered Entity Information
Company Name: Gainesville Regional Utilities
Company Address: P.O. Box 147117 E37 Gainesville, Fl 32614-7117
NERC Compliance Registry ID (*if known*): NCR00032

Date Original Mitigation Plan was submitted to FRCC:

Date Mitigation Plan was completed: May 19, 2009

Name of Standard and the Requirement(s) covered under the accepted Mitigation Plan:
PRC-008-0 — Underfrequency Load Shedding Equipment Maintenance Programs

NERC Violation ID # (*if known*)**:**

Date of Certification: June 4, 2009

I certify that the mitigation plan for the above named alleged or confirmed violation has been completed on the date shown above, and that all information submitted information is complete and correct to the best of my knowledge.

Name: Ken Simmons
Title: Systems Control Manager
Email: simmonskm@gru.com
Phone: 352-393-6412
Authorized Individual Signature 

To close out a completed Mitigation Plan, fill out this form, save and email it to compliancemanager@frcc.com.

FLORIDA RELIABILITY COORDINATING COUNCIL, INC.
1408 N. WESTSHORE BLVD., SUITE 1002
TAMPA, FLORIDA 33607-4512
PHONE 813.289.5644 • FAX 813.289.5646
WWW.FRCC.COM

VIA E-MAIL

February 3, 2010

Mr. Richard Bachmeier
Electric System Planning Director
Gainesville Regional Utilities
P.O. Box 147117
Station A136
Gainesville, FL 32614-7117

RE: Gainesville Regional Utilities (GRU)
Mitigation Plan – Self-Reported Violation
of NERC Standard PRC-008-0, R2
FRCC200900309

Dear Mr. Bachmeier,

The mitigation plan and mitigation completion documents submitted by Gainesville Regional Utilities (GRU), for the above referenced self-reported violation, has been received by the Florida Reliability Coordinating Council, Inc. (FRCC). After review, the FRCC accepts this mitigation plan for PRC-008-0 and the FRCC finds, after review of GRU's evidence, that GRU has completed this mitigation plan. The FRCC will forward the submitted mitigation plan to the North American Electric Reliability Corporation (NERC) for its review and approval, and NERC will send an approved mitigation plan to the Federal Energy Regulatory Commission as non-public confidential information.

FRCC will also notify NERC that GRU has completed its mitigation plan accordingly.

If you have any questions, feel free to contact me at 813-207-7968.

Respectfully,

Barry Pagel
Director of Compliance
bpagel@frcc.com

BP/gw

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment f

Record Documents for BAL-005-0.1b R11 (FRCC201000392)

i. FRCC's Source Document Information dated September 23, 2010

ii. GRU's Mitigation Plan MIT-07-2846 submitted September 9, 2010

iii. GRU's Certification of Mitigation Plan Completion dated September 9, 2010

iv. FRCC's Verification of Mitigation Plan Completion dated October 20, 2010

FLORIDA RELIABILITY COORDINATING COUNCIL, INC.
1408 N. WESTSHORE BLVD., SUITE 1002
TAMPA, FLORIDA 33607-4512
PHONE 813.289.5644 • FAX 813.289.5646
WWW.FRCC.COM

SOURCE DOCUMENT INFORMATION
Dated 9/23/10

Registered Entity: Gainesville Regional Utilities (GRU)
NERC Registry ID #:NCR00032
NERC #: FRCC201000392

	STANDARD NUMBER	REQUIREMENT	DISCOVERY	DISCOVERY DATE	FINDING
1	BAL-005-0.1b	11	SPOT CHECK	8/18/10	NON-COMPLIANT- There were three GRU Interchange Transaction Tags ("tags") between June 20, 2009 and August 21, 2009 that did not identify the ramp rate start/stop times (Null value). As evidenced in the three Tags, the default used by GRU and the other party to the Interchange Transaction Tag for these null tags were not the same ramp rate and did not accurately include the effects of ramp rate in its Schedule Interchange value to calculate Area Control Error (ACE).

Edit - Mitigation Plan

* Required Fields

Status: Saved

Mitigation Plan Summary

Mitigation Plan Status:	**Region reviewing Mitigation Plan**
NERC Mitigation Plan #:	
Associated Violations:	**ID Not Assigned**
Mitigation Plan Due Date:	
Expected Completion Date:	**1/27/2010**

Section A: Compliance Notices & Mitigation Plan Requirements

A.1 Notices and requirements applicable to Mitigation Plans and this Submittal Form are set forth in "Attachment A - Compliance Notices & Mitigation Plan Requirements" to this form.

A.2 ☐ I have reviewed Attachment A and understand that this Mitigation Plan Submittal Form will not be accepted unless this box is checked.

Section B: Registered Entity Information

B.1 Identify your organization

Company Name: Gainesville Regional Utilities

Company Address: P.O. Box 147117, 301 SE 4th Avenue
Gainesville, Florida
32614

NERC Compliance Registry ID: NCR00032

B.2 Identify the individual in your organization who will be the Entity Contact regarding this Mitigation Plan.

Name: * Richard Bachmeier

Section C: Identification of Alleged or Confirmed Violation(s) Associated with this Mitigation Plan

C.1 This Mitigation Plan is associated with the following Alleged or Confirmed violation(s) of the reliability standard listed below.

Applicable Standard, Requirement(s) and Violation Date:

Standard: BAL-005-0.1b

☐ BAL-005-0.1b R11. (08/18/2010)

C.2 Identify the cause of the Alleged or Confirmed violation(s) identified above. Additional detailed information may be provided as an attachment:

Tag transactions did not identify ramp rate start/stop times (null).

C.3 Provide any additional relevant information regarding the Alleged or Confirmed violations associated with this Mitigation Plan. Additional detailed information may be provided as an attachment:

The FRCC Handbook states that all entities within FRCC will use 20 minute ramp times unless otherwise by agreement. It also states that the NERC guidelines of 10 minute ramp time will be used if the Transaction Tag has a blank ramp time.

Section D: Details of Proposed Mitigation Plan

D.1 Identify and describe the action plan, including specific tasks and actions that your organization is proposing to undertake, or which it undertook if this Mitigation Plan has been completed, to correct the Alleged or Confirmed violations identified above in Part C.1 of this form.

Additional detailed information may be provided as an attachment:

Upon discovery of potential violations, the GRU changed its procedures to reject any transactions that do not specify a ramp time. The Power System Coordinators were directed to follow the revised procedure effective immediately on September 9, 2009.

A transaction approval procedure has been implemented to include this requirement as well as to clarify steps to ensure compliance with the NERC Reliability Standards. The Mitigation Plan has been fully implemented.

D.2 **Provide the date by which full implementation of the Mitigation Plan will be, or has been, completed with respect to the Alleged or Confirmed violations identified above. State whether the Mitigation Plan has been fully implemented:**

1/27/2010

D.3 **Enter Milestone Activities, with due dates, that your organization is proposing, or has completed, for this Mitigation Plan:**

Milestone	Status	Due Date	Completed Date	
Notify operators of Transaction Approval Process Change	Milestone Completed	9/9/2009	9/9/2009	Detail
Implement procedure to address all steps of transaction approval process	Milestone Completed	1/31/2010	1/27/2010	Detail

Section E: Interim and Future Reliability Risk

Abatement of Interim BPS Reliability Risk

E.1 **While your organization is implementing this Mitigation Plan the reliability of the Bulk Power System (BPS) may remain at higher risk or be otherwise negatively impacted until the plan is successfully completed. To the extent they are, or may be, known or anticipated: (i) identify any such risks or impacts; and (ii) discuss any actions that your organization is planning to take to mitigate this increased risk to the reliability of the BPS.**
Additional detailed information may be provided as an attachment:

No impact on reliability. Process changes are already in effect.

Prevention of Future BPS Reliability Risk

E.2 **Describe how successful completion of this Mitigation Plan will prevent or minimize the probability that your organization incurs further risk of Alleged violations of the same or similar reliability standards requirements in the future.**
Additional detailed information may be provided as an attachment:

Revised procedure is documented, which will reduce the potential to violate the standards.

Section G: Regional Entity Contact

Please direct any questions regarding completion of this form to:

FRCC Mitigation Plan Completion Form

Certification of a Completed Mitigation Plan

All Mitigation Plan Completion Certification submittals shall include data or information sufficient for FRCC to verify completion of the Mitigation Plan. FRCC may request such additional data or information and conduct follow-up assessments, on-site or other Spot Checking, or Compliance Audits as it deems necessary to verify that all required actions in the Mitigation Plan have been completed and the Registered Entity is in compliance with the subject Reliability Standard. (CMEP Section 6.6)

Registered Entity Information
Company Name: Gainesville Regional Utilities
Company Address: PO Box 147117, E37 Gainesville, FL 32614-7117
NERC Compliance Registry ID: NCR00032

Date Original Mitigation Plan was submitted to FRCC: 9/9/2010

Date Mitigation Plan was completed: 1/27/2010

Name of Standard and the Requirement(s) covered under the accepted Mitigation Plan: BAL-005-0.1b, R11

NERC Violation ID # (*if known*)**: FRCC201000392**

Date of Certification: 9/9/2010

I certify that the mitigation plan for the above named alleged or confirmed violation has been completed on the date shown above, and that all information submitted information is complete and correct to the best of my knowledge.

Name: Richard Bachmeier
Title: Electric System Planning Director
Email: bachmeierrd@gru.com
Phone: 352-393-1284

Authorized Individual Signature 

To close out a completed Mitigation Plan, fill out this form, save and email it to compliancemanager@frcc.com.

FRCC
Florida Reliability Coordinating Council, Inc.

FLORIDA RELIABILITY COORDINATING COUNCIL, INC.
1408 N. WESTSHORE BLVD., SUITE 1002
TAMPA, FLORIDA 33607-4512
PHONE 813.289.5644 • FAX 813.289.5646
WWW.FRCC.COM

VIA E-MAIL

October 20, 2010

Mr. Richard Bachmeier
Electric System Planning Director
Gainesville Regional Utilities
P.O. Box 147117 E37
Gainesville, FL 32614-7117

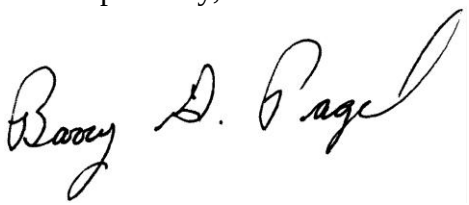
RE: Gainesville Regional Utilities (GRU)
Mitigation Plan – Spot Check Violation of
NERC Standard BAL-005-0.1b, R11
NERC Violation ID#: FRCC201000392

Dear Mr. Bachmeier,

The Mitigation Plan submitted by Gainesville Regional Utilities (GRU) for the above referenced self-reported violation, has been received by the Florida Reliability Coordinating Council, Inc. (FRCC). After review, the FRCC finds this Mitigation Plan for BAL-005-0.1b, R11, to be **completed**. The FRCC will notify NERC that this mitigation plan is completed accordingly.

If you have any questions, feel free to contact me at 813-207-7968.

Respectfully,



Barry Pagel
Director of Compliance
bpagel@frcc.com

BP/rr

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Attachment g

Notice of Filing

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Gainesville Regional Utilities Docket No. NP11-___-000

NOTICE OF FILING
February 23, 2011

Take notice that on February 23, 2011, the North American Electric Reliability Corporation (NERC) filed a Notice of Penalty regarding Gainesville Regional Utilities in the Florida Reliability Coordinating Council, Inc. region.

Any person desiring to intervene or to protest this filing must file in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 CFR 385.211, 385.214). Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a notice of intervention or motion to intervene, as appropriate. Such notices, motions, or protests must be filed on or before the comment date. On or before the comment date, it is not necessary to serve motions to intervene or protests on persons other than the Applicant.

The Commission encourages electronic submission of protests and interventions in lieu of paper using the "eFiling" link at http://www.ferc.gov. Persons unable to file electronically should submit an original and 14 copies of the protest or intervention to the Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426.

This filing is accessible on-line at http://www.ferc.gov, using the "eLibrary" link and is available for review in the Commission's Public Reference Room in Washington, D.C. There is an "eSubscription" link on the web site that enables subscribers to receive email notification when a document is added to a subscribed docket(s). For assistance with any FERC Online service, please email FERCOnlineSupport@ferc.gov, or call (866) 208-3676 (toll free). For TTY, call (202) 502-8659.

Comment Date: [BLANK]

Kimberly D. Bose,
Secretary