

November 30, 2016

VIA ELECTRONIC FILING

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

**Re: NERC Full Notice of Penalty regarding Lake Worth, City of,
FERC Docket No. NP17-_-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Notice of Penalty¹ regarding Lake Worth, City of (LWU), NERC Registry ID# NCR00043,² with information and details regarding the nature and resolution of the violations³ discussed in detail in the Notice of Confirmed Violation (NOCV) attached hereto (Attachment A), in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations, and orders, as well as NERC's Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).⁴

¹ *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 (2016). *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).

² LWU was included on the NERC Compliance Registry as a Distribution Provider (DP), Generator Owner (GO), Generator Operator, and Transmission Owner (TO) on May 29, 2007 and as a Resource Planner on January 1, 2014.

³ 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.

⁴ See 18 C.F.R § 39.7(c)(2) and 18 C.F.R § 39.7(d).

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NERC is filing this Notice of Penalty with the Commission because Florida Reliability Coordinating Council, Inc. (FRCC) issued a NOCV to LWU to resolve all outstanding issues arising from FRCC’s determination and findings of the violations of FAC-009-1 R1, PRC-005-1 R2, and PRC-008-0 R2.

NERC is filing this Notice of Penalty with the Commission because, based on information from FRCC, LWU does not dispute the violations and the proposed seventy thousand dollar (\$70,000) penalty to be assessed to LWU.

Statement of Findings Underlying the Violations

This Notice of Penalty incorporates the findings and justifications set forth in the NOCV issued on September 22, 2016, by FRCC. The details of the findings and basis for the penalty are set forth in the NOCV and herein. This Notice of Penalty filing contains the basis for approval of the NOCV 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 (2016), NERC provides the following summary table identifying each violation of a Reliability Standard resolved by the NOCV. Further information on the subject violations is set forth in the NOCV and herein.

*SR = Self-Report / SC = Self-Certification / CA = Compliance Audit / SPC = Spot Check / CI = Compliance Investigation

NERC Violation ID	Standard	Req	VRF/ VSL	Applicable Function(s)	Discovery Method* Date	Violation Start-End Date	Risk	Penalty Amount
FRCC2014013685	FAC-009-1	R1	Medium/ Severe	TO, GO	CA 3/25/2014	9/11/2009-9/4/2016	Moderate	\$70,000
FRCC2014013686	PRC-005-1	R2; R2.1; R2.2	High/ Moderate			9/4/2009-9/28/2016	Minimal	
FRCC2014013687	PRC-008-0	R2	Medium/ Severe	DP	9/4/2009-9/4/2016	Minimal		

FRCC2014013685 FAC-009-1 R1 - OVERVIEW

FRCC determined that LWU did not establish Facility Ratings consistent with the associated Facility Ratings methodology document for more than 15% of its Facilities.

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FRCC determined that this violation posed a moderate and not serious or substantial risk to the reliability of the bulk power system (BPS). Attachment 1 to the NOCV includes the facts in place during the violation that FRCC considered in its risk assessment.

LWU submitted its Mitigation Plan designated FRCCMIT010853 to address the referenced violation on July 23, 2014, with a proposed completion date of December 17, 2014. On September 14, 2015, LWU submitted an extension request with a new proposed completion date of November 13, 2015. Attachment 1 to the NOCV includes a description of the mitigation activities LWU took to address this violation. A copy of the Mitigation Plan and extension are included as Attachments C1 and C2, respectively.

FRCC verified on September 20, 2016 that LWU had completed all mitigation activities on September 4, 2016. Attachments A and C4 provide specific information on FRCC's verification of LWU's completion of the activities.

FRCC2014013686 PRC-005-1 R2; R2.1; R2.2 - OVERVIEW

FRCC determined that LWU did not provide sufficient evidence that 9 out of 76 (11.8%) Protection System devices were maintained and tested within the defined intervals.

FRCC determined that this violation posed a minimal and not serious or substantial risk to the reliability of the BPS. Attachment 1 to the NOCV includes the facts in place during the violation that FRCC considered in its risk assessment.

LWU submitted its revised Mitigation Plan designated FRCCMIT010854-1 to address the referenced violation on August 5, 2016, with a proposed completion date of September 30, 2016. Attachment 1 to the NOCV includes a description of the mitigation activities LWU took to address this violation. A copy of the revised Mitigation Plan is included as Attachment D1.

FRCC verified on October 12, 2016 that LWU had completed all mitigation activities on September 28, 2016. Attachments A and D4 provide specific information on FRCC's verification of LWU's completion of the activities.

FRCC2014013687 PRC-008-0 R2 - OVERVIEW

FRCC determined that LWU did not provide sufficient evidence that it maintained and tested 19 out of 28 (68%) UFLS relays in accordance with its UFLS maintenance and testing program.

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FRCC determined that this violation posed a minimal and not serious or substantial risk to the reliability of the BPS. Attachment 1 to the NOCV includes the facts in place during the violation that FRCC considered in its risk assessment.

LWU submitted its revised Mitigation Plan designated FRCCMIT010855-1 to address the referenced violation on August 5, 2016, with a proposed completion date of September 9, 2016. Attachment 1 to the NOCV includes a description of the mitigation activities LWU took to address this violation. A copy of the revised Mitigation Plan is included as Attachment E1.

FRCC verified on September 19, 2016 that LWU had completed all mitigation activities on September 4, 2016. Attachments A and E4 provide specific information on FRCC's verification of LWU's completion of the activities.

Regional Entity's Basis for Penalty

On December 16, 2014, FRCC and LWU originally executed a Settlement Agreement to resolve these violations for a \$0 penalty in exchange for LWU performing a number of above and beyond activities. After execution of the prior Settlement Agreement, LWU failed to complete its three Mitigation Plans and was tardy in its completion of the above and beyond activities agreed to in the Settlement Agreement. LWU's Mitigation Plans were due for completion by December 17, 2014, and were still incomplete as of August 26, 2015. LWU's above and beyond activities were due January 30, 2015, and were not completed until June 10, 2015. LWU failed to provide any notification to FRCC regarding its inability to meet any of these deadlines. After several months of attempted contact, FRCC rescinded the Settlement Agreement and on September 3, 2015, issued a Notice of Alleged Violation and Proposed Penalty or Sanction (NOAV) assessing the penalty amount of \$42,000.

On September 14, 2015, LWU submitted requests for Mitigation Plan Extensions for all three of its previously accepted plans. LWU's explanation for the requested extensions was its loss of available technical staff due to attrition. LWU stated that since the loss of its technical personnel, it had entered into a contract with an independent engineering company to provide the proper resources to ensure completion of the Mitigation Plan activities and address future compliance.

After FRCC issued the NOAV, LWU continued to fail to meet agreed-upon milestone completion dates without seeking an extension. In response, FRCC issued a second NOAV in which it removed all credits from the penalty calculation and assessed the current penalty amount of \$70,000.

According to the NOCV, FRCC has assessed a penalty of seventy thousand dollars (\$70,000) for the referenced violations. In reaching this determination, FRCC considered the following factors:

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1. FRCC considered LWU had relevant compliance history regarding FAC-009-1 R1. FRCC determined the compliance history should not serve as an aggravating factor for the reasons detailed in Attachment A;⁵
2. there was no evidence of any attempt to conceal a violation nor evidence of intent to do so;
3. the violation of FRCC2014013685 posed a moderate risk, and the violations of FRCC2014013686 and FRCC2014013687 posed a minimal risk but did not pose a serious or substantial risk to the reliability of the BPS, as discussed in Attachment A;
4. LWU's failed to complete its three Mitigation Plans according to the original milestone dates;
5. LWU was tardy in completing its above and beyond activities;
6. LWU failed to timely or adequately communicate to FRCC its inability to meet either the Mitigation Plan or above and beyond activities completion deadlines; and
7. there were no other mitigating or aggravating factors or extenuating circumstances that would affect the assessed penalty.

After consideration of the above factors, FRCC determined that, in this instance, the penalty amount of seventy thousand dollars (\$70,000) is appropriate and bears a reasonable relation to the seriousness and duration of the violations.

Statement Describing the Assessed Penalty, Sanction or Enforcement Action Imposed⁶

Basis for Determination

Taking into consideration the Commission's direction in Order No. 693, the NERC Sanction Guidelines and the Commission's July 3, 2008, October 26, 2009 and August 27, 2010 Guidance Orders,⁷ the NERC BOTCC reviewed the NOCV and supporting documentation on October 31, 2016 and approved the NOCV. In approving the NOCV, the NERC BOTCC reviewed the applicable requirements of the Commission-approved Reliability Standards and the underlying facts and circumstances of the violations at issue.

⁵ LWU's relevant prior noncompliance with FAC-009-1 R1 includes NERC Violation ID FRCC200900252.

⁶ See 18 C.F.R. § 39.7(d)(4).

⁷ *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).

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For the foregoing reasons, especially LWU's lack of responsiveness and engagement with FRCC, the NERC BOTCC approved the NOCV and believes that the assessed penalty of seventy thousand dollars (\$70,000) 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 Notice of Penalty 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 part of this Notice of Penalty are the following documents:

- a) The NOCV issued September 22, 2016, included as Attachment A;
 - a. Supporting Information for Each Violation, included as Attachment 1 to the NOCV;
- b) LWU's Notice of Possible Violation for FAC-009-1 R1, PRC-005-1 R2.1 and R2.2, and PRC-008-0 R1, dated May 6, 2014, included as Attachment B;
- c) Record documents for the violation of FAC-009-1 R1, included as Attachment C:
 1. LWU's Mitigation Plan designated as FRCCMIT010853 submitted July 23, 2014;
 2. LWU's Mitigation Plan Extension Request submitted September 14, 2015;
 3. LWU's Certification of Mitigation Plan Completion dated September 15, 2016;
 4. FRCC's Verification of Mitigation Plan Completion dated September 20, 2016;
- d) Record documents for the violation of PRC-005-1 R2.1 and R2.2, included as Attachment D:
 1. LWU's Mitigation Plan designated as FRCCMIT010854-1 submitted August 5, 2016;
 2. LWU's Certification of Mitigation Plan Completion dated September 28, 2016;
 3. FRCC's Verification of Mitigation Plan Completion dated October 12, 2016;
- e) Record documents for the violation of PRC-008-0 R1, included as Attachment E:
 1. LWU's Mitigation Plan designated as FRCCMIT010855-1 submitted August 5, 2016;
 2. LWU's Certification of Mitigation Plan Completion dated September 4, 2016; and
 3. FRCC's Verification of Mitigation Plan Completion dated September 19, 2016.

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

<p>Stacy Dochoda* President and Chief Executive Officer Florida Reliability Coordinating Council, Inc. 3000 Bayport Drive, Suite 600 Tampa, Florida 33607-8411 (813) 207-7960 (813) 289-5646 – facsimile sdochoda@frcc.com</p>	<p>Sonia C. Mendonça* Vice President of Enforcement and Deputy General Counsel North American Electric Reliability Corporation 1325 G Street N.W. Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile sonia.mendonca@nerc.net</p>
<p>Linda Campbell* VP and Executive Director Standards & Compliance Florida Reliability Coordinating Council, Inc. 3000 Bayport Drive, Suite 600 Tampa, Florida 33607-8411 (813) 207-7961 (813) 289-5646 – facsimile lcampbell@frcc.com</p>	<p>Edwin G. Kichline* Senior Counsel and Associate Director, Enforcement North American Electric Reliability Corporation 1325 G Street N.W. Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile edwin.kichline@nerc.net</p>
<p>Barry Pagel* Director of Compliance Florida Reliability Coordinating Council, Inc. 3000 Bayport Drive, Suite 600 Tampa, Florida 33607-8402 (813) 207-7968 (813) 289-5646 – facsimile bpagel@frcc.com</p>	<p>Leigh Anne Faugust* Counsel, Enforcement North American Electric Reliability Corporation 1325 G Street N.W. Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile leigh.faugust@nerc.net</p>
<p>Ralph Anderson Compliance Officer NERC & EPA City of Lake Worth 1900 2nd Ave North Lake Worth, Florida 33461 (561) 586-1705 randerson@lakeworth.org</p>	

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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.

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Conclusion

NERC respectfully requests that the Commission accept this Notice of Penalty as compliant with its rules, regulations, and orders.

Respectfully submitted,

/s/ Edwin G. Kichline

Sonia C. Mendonça
Vice President of Enforcement and Deputy
General Counsel
Edwin G. Kichline
Senior Counsel and Associate Director,
Enforcement
Leigh Anne Faugust
Counsel, Enforcement
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cc: Lake Worth, City of
Florida Reliability Coordinating Council, Inc.

Attachments

Attachment A

**Notice of Confirmed Violation issued
September 22, 2016**

**A1 – Supporting Information for each
Violation**



FLORIDA RELIABILITY COORDINATING COUNCIL, INC.
3000 BAYPORT DRIVE, SUITE 600
TAMPA, FLORIDA 33607-8410
PHONE 813.289.5644 • FAX 813.289.5646
WWW.FRCC.COM

Notice of Confirmed Violations

To: Ralph Anderson
Compliance Officer NERC & EPA
City of Lake Worth

From: Andrew Williamson
Manager of Enforcement
Florida Reliability Coordinating Council, Inc.

Date: September 22, 2016

Re: Notice of Confirmed Violations

I. Introduction

In accordance with Section 5.4 of the NERC Compliance Monitoring and Enforcement Program (“CMEP”), the Florida Reliability Coordinating Council (“FRCC”) hereby notifies the City of Lake Worth (“LWU”) of Confirmed Violations of the North American Electric Reliability Corporation (“NERC”) Reliability Standards, FAC-009-1, R1; PRC-005-1, R2, R2.1, R2.2; and PRC-008-0, R2, and the penalties for such violations.

II. Applicable Law

FRCC issues this Notice of Confirmed Violations (“Notice”) to LWU in accordance with the CMEP, the Federal Energy Regulatory Commission’s (“FERC”) rules, regulations, and orders, and with the NERC Rules of Procedure.

III. Disclosure Notice

NERC may include information from this Notice, and any statement submitted by LWU in response to it, as part of the public record unless LWU marks specific information as Confidential Critical Energy Infrastructure Information (“CEII”) or Confidential Information in accordance with NERC’s Rules of Procedure Section 1500 or the Applicable Governmental Authority’s regulations, rules, and orders. It is LWU’s responsibility as a Registered Entity to identify any confidential information contained in this Notice of Confirmed Violations and to provide supporting justification for designating it as such within five business days after the date of this Notice.

IV. Confirmed Violations

NERC Violation Tracking Identification Numbers:

FRCC2014013685
FRCC2014013686
FRCC2014013687

FRCC Tracking Identification Numbers:

FRCC2014- 100800
FRCC2014- 100801
FRCC2014- 100802

This Notice addresses the Alleged Violations set forth in the Notice of Alleged Violation issued by FRCC on July 29, 2016. LWU responded to the Notice of Alleged Violation on August 25, 2016 (“Response”).

In the Response, LWU stated “The City of Lake Worth Electric Utility (LWU) is in receipt of the above referenced Notice of Alleged Violation and Proposed Penalty or Sanction (dated and received July 29, 2016) (“Notice”). Based upon LWU’s review of the Notice and the circumstances surrounding the same, LWU agrees with the Alleged Violation and the proposed Penalty or Sanction.”

As described in Attachment 1, LWU submitted, and FRCC accepted, a Mitigation Plan to correct the violations addressed herein.

In accordance with the NERC Rules of Procedure and the CMEP, the Alleged Violations addressed in the Notice of Alleged Violation are now Confirmed Violations. A summary of the facts and evidence supporting each Confirmed Violation is set forth in Attachment 1.

V. Proposed Penalty or Sanction

In this action, FRCC is exercising its discretion to assess a \$70,000.00 penalty against LWU for the Confirmed Violations listed in Attachment 1.

FRCC’s determination of penalties is guided by the statutory requirement codified at 16 U.S.C. § 824o(e)(6) that any penalty imposed “shall bear a reasonable relation to the seriousness of the violation and shall take into consideration the efforts of to remedy the violation in a timely manner.” In addition, FRCC considers the direction of the Commission provided in Order No. 693, the NERC Sanction Guidelines, the Commission’s Policy Statement on Enforcement, the Commission’s July 3, 2008 Guidance Order, the Commission’s August 27, 2010 Guidance Order, and all other applicable guidance from NERC and FERC.

To determine a penalty or sanction, FRCC considers various factors including, but not limited to: (1) Violation Risk Factor; (2) Violation Severity Level, (3) risk to the reliability of the Bulk Power System (“BPS”), including the seriousness of the violation; (4) Violation Time Horizon (5) the violation’s duration; (6) the Registered Entity’s compliance history; (7) the Registered Entity’s self-reports and voluntary corrective action; (8) the degree and quality of cooperation by the Registered Entity in the audit or investigation process, and in any remedial action; (9) the quality of the Registered Entity’s compliance program; (10) any attempt by the Registered Entity to conceal the violation or any related information; (11) whether the violation was intentional; (12) any other relevant information or extenuating circumstances; and (13) the Registered Entity’s ability to pay a penalty, as applicable.

VI. Process Governing Confirmed Violations of Reliability Standards

In accordance with CMEP Section 8.0, FRCC is providing a copy of this Notice to NERC for its review and consideration. A Registered Entity may submit a statement to NERC to accompany FRCC’s filing. The Registered Entity must provide this statement within five business days after the date of the Notice of Confirmed Violations. The Registered Entity’s statement can be the same statement it filed in response to FRCC’s Notice of Alleged Violation. The statement must be written on company letterhead and an officer, employee, attorney, or other authorized representative of the Registered Entity must sign it.

The proposed penalty or sanction set forth in this Notice is subject to review and revision by NERC. If the NERC Board of Trustees Compliance Committee (“BOTCC”) approves the Notice of Confirmed Violations as submitted by FRCC, or as modified by the BOTCC, NERC will submit a Notice of Penalty (“NOP”) to FERC, and send copies of the NOP to the Registered Entity and FRCC. FRCC’s proposed penalty or sanction will be effective upon expiration of the 30-day period following NERC’s filing of the NOP with FERC, unless FERC decides to review the NOP. If FERC reviews the NOP, the proposed penalty or sanction will not become effective until FERC makes a final determination. FERC may approve, reject, or modify the findings and/or penalties or sanctions set forth in the NOP.

VII. Conclusion

Any questions regarding this Notice of Confirmed Violations issued by FRCC should be directed to Andrew Williamson, Manager of Enforcement.

Notice of Confirmed Violations



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In any correspondence, please provide the name and contact information of an LWU representative who is authorized to address the above-listed Confirmed Violations. Please also list the relevant NERC Violation Tracking Identification Numbers in any correspondence.

Respectfully submitted,

A handwritten signature in cursive script that reads "Andrew C. Williamson".

Andrew C. Williamson
Manager of Enforcement
awilliamson@frcc.com

AW/ah

cc: L. Campbell, FRCC
NERC Enforcement

Enclosure: Attachment 1 – Supporting Information for each Violation

Region	Registered Entity	NCR_ID	NERC Violation ID #	Notice of Confirmed Violation or Settlement Agreement	Description of the Violation	Reliability Standard	Req.	Violation Risk Factor	Violation Severity Level	Risk Assessment	Violation Start Date	Violation End Date	Total Penalty or Sanction (\$)	Method of Discovery	Description of Mitigation Activity	Mitigation Completion Date	Date Regional Entity Verified Completion of Mitigation	"Admits," "Agrees/Stipulates," "Neither Admits nor Denies," or "Does Not Contest"
Florida Reliability Coordinating Council, Inc. (FRCC)	Lake Worth, City of (LWU)	NCR00043	FRCC2014013685	Notice of Confirmed Violation	<p>During a Compliance Audit conducted from March 17, 2014 through March 25, 2014, FRCC determined that LWU, as a Transmission Owner and Generator Owner, was in violation of FAC-009-1 R1. LWU provided insufficient evidence to demonstrate that LWU established Facility Ratings for its solely and jointly owned Facilities that were consistent with the associated Facility Ratings methodology or documentation for determining its Facility Ratings.</p> <p>The Facility Ratings methodology required that emergency ratings for substation equipment would be equivalent to normal ratings, but the established emergency ratings are greater than the normal rating for circuit breakers and disconnect switches at the Hypoluxo and Main substations. For two substation facilities the Facility Ratings do not include buses or jumpers as were required by LWU's Facility Ratings methodology document.</p> <p>LWU's Facility Ratings spreadsheet did not include generator bus ducts, generator circuit breakers, and generator step-up transformers.</p> <p>LWU failed to establish Facility Ratings consistent with the associated Facility Ratings methodology document for more than 15% of its Facilities. The root cause for this violation was LWU's lack of compliance understanding.</p>	FAC-009-1	R1	Medium	Severe	<p>This violation posed a moderate risk and did not pose a serious or substantial risk to the reliability of the bulk power system (BPS). Inaccurate Facility Ratings precludes the Bulk Electric System (BES) from being operated within reliable limits, determining accurate contingencies, and performing functional studies. LWU established two Facility Ratings but provided no evidence for establishing Facility Ratings for two BES generating units. The risk was reduced because LWU comprises 0.06% of the Regional transmission system and 0.2% of the Regional load and generation. The risk was further reduced as there is no flow through LWU, as LWU only has two tie-lines that run in parallel and connect LWU to the same Florida Power & Light substation.</p> <p>No harm is known to have occurred.</p>	9/11/2009 (revision date of LWU's current Facility Ratings document)	9/4/2016 (Mitigation Plan completion)	\$70,000 (for FRCC2014013685, FRCC2014013686, and FRCC2014013687)	Compliance Audit	<p>To mitigate this violation LWU:</p> <ol style="list-style-type: none"> 1) verified its Facility Ratings include all applicable components and have the correct normal and emergency Facility Ratings; 2) validated/updated the Facility Ratings to comply with the associated Facility Ratings methodology document; 3) verified/updated system and station one-line diagrams reflect the correct configuration, appropriate identification, and sufficient labeling of component parameters; 4) created/updated procedures to include: identifying changes in Facility Ratings, procedures for changes in Facility Ratings, processes/studies for changes in Facility Ratings, and notifications for changes in Facility Ratings; 5) notified the Reliability Coordinator and applicable Transmission Operators of updated Ratings and System Operating Limits (SOLs); 6) updated its energy management system/supervisory control and data acquisition system to the correct ratings and operating limits; 7) verified/updated SOLs for associated Facility Ratings changes; 8) assigned individuals to primary and secondary responsibilities for review and validation of the FAC-008 procedures and documentation; and 9) trained the operating personnel on the updated Ratings, operating limits, and procedural changes. 	9/4/2016	9/20/2016	Does Not Contest
Florida Reliability Coordinating Council, Inc. (FRCC)	Lake Worth, City of (LWU)	NCR00043	FRCC2014013686	Notice of Confirmed Violation	<p>During a Compliance Audit conducted from March 17, 2014 through March 25, 2014, FRCC determined that LWU, as a Transmission Owner and Generator Owner, was in violation of PRC-005-1 R2, R2.1 and R2.2. LWU failed to provide sufficient evidence demonstrating it had a complete Protection System maintenance and testing program. LWU failed to provide, when requested, the entire implementation of that program to the FRCC within 30 calendar days.</p> <p>Specifically, LWU did not provide any evidence that three relays (GT2 relays 51V-1, 51V-2, and 51V-3) listed on the LWU Bulk Electric System (BES) Relay spreadsheet (LWU-021) were tested and maintained.</p> <p>Additionally, the evidence provided for four relays (GT1 relays 27B, 64G and GT2 relays 32 and 64G) was insufficient to demonstrate the relays were tested and maintained.</p> <p>The LWU BES Relay spreadsheet states there are no communication devices at Hypoluxo or Main substations. However, the Hypoluxo AC elementary diagram includes pilot wire communication between Hypoluxo and Main substations. LWU was unable to provide evidence the one pilot wire was tested and maintained per the LWU program.</p> <p>Finally, the Hypoluxo AC elementary diagram shows three 138 kV BES lines, but the LWU BES Relay spreadsheet only included two distance relays (device 21). LWU did not provide evidence demonstrating which of the two lines were protected by the two distance relays included on the spreadsheet, and what relay was protecting the third line.</p> <p>LWU failed to provide sufficient evidence that 9 out of 76 (11.8%) Protection System devices were maintained and tested within the defined intervals. The root cause for this violation was employee turnover.</p>	PRC-005-1	R2; R2.1; R2.2	High	Moderate	<p>This violation posed a minimal risk and did not pose a serious or substantial risk to the reliability of the bulk power system (BPS). Inadequate maintenance and testing of Protective System devices can result in improper protective actions leading to BES equipment damage or a delayed system restoration. LWU's Protection System maintenance and testing program contains 76 Protective System devices, therefore LWU was deficient in less than 12% (9 of 76 Protective System devices) of the required Protection System maintenance and testing. Additionally, LWU comprises 0.06% of the regional transmission system and 0.2% of the regional load and generation. The risk is further reduced as there is no flow through LWU as LWU only has two tie-lines, which run in parallel and connect LWU to the same Florida Power & Light substation.</p> <p>No harm is known to have occurred.</p>	9/4/2009 (when FRCC completed its prior Compliance Audit of LWU and did not have a finding)	9/27/2016 (Mitigation Plan completion)	\$70,000 (for FRCC2014013685, FRCC2014013686, and FRCC2014013687)	Compliance Audit	<p>To mitigate this violation LWU:</p> <ol style="list-style-type: none"> 1) performed an inventory of transmission Protection System components; 2) validated/updated LWU's Protection System maintenance and testing program document to ensure all transmission Protection System components have defined maintenance and testing intervals and a summary of maintenance and testing procedures; 3) verified that all Protection System components have been maintained and tested within the defined intervals and have appropriate documentation of the completed maintenance and tests; 4) performed any missed maintenance and testing for identified transmission Protection System components; 5) reported any additional non-compliance occurrences to the FRCC Compliance staff; 6) created/updated procedure(s) to include: identifying changes in Protection Systems, procedures for changes in Protection Systems, processes/studies for changes in Protection Systems, and notification for changes in Protection Systems; and 7) assigned individuals to primary and secondary responsibilities for review and validation of the PRC-005 procedures and documentation. 	9/27/2016	10/12/2016	Does Not Contest
Florida Reliability Coordinating Council, Inc. (FRCC)	Lake Worth, City of (LWU)	NCR00043	FRCC2014013687	Notice of Confirmed Violation	<p>During a Compliance Audit conducted from March 17, 2014 through March 25, 2014, FRCC determined that LWU, as a Distribution Provider (DP), was in violation of PRC-008-0 R2. LWU provided insufficient evidence demonstrating it implemented its entire Under Frequency Load Shedding (UFLS) equipment maintenance and testing program. LWU failed to provide its complete UFLS maintenance and testing program results to the FRCC within 30 calendar days upon FRCC's request. LWU has 28 feeder circuits in its Automatic Load Shedding Program. For 12 feeder circuits, the test results provided did not match the relay settings provided on the LWU Automatic Load Shedding Program Summary. For one feeder circuit, the evidence was not sufficient to demonstrate the UFLS equipment maintenance and testing program was implemented. For six feeder circuits, LWU did not provide evidence to the FRCC within 30 calendar days upon request.</p> <p>LWU failed to provide sufficient evidence that 19 out of 28 (68%) UFLS relays were maintained and tested in accordance with its UFLS maintenance and testing program. The root cause for this violation was employee turnover.</p>	PRC-008-0	R2	Medium	Severe	<p>This violation posed a minimal risk and did not pose a serious or substantial risk to the reliability of the bulk power system (BPS). Inadequate testing or maintenance of UFLS relays may lead to insufficient shedding of load for a required event, therefore other DPs in the region would be required to supply the additional load shedding. The risk was reduced because the total load shedding for LWU's inadequately tested UFLS relays is 37.44 MW and the regional UFLS requirement is 26,748 MW (55% of regional peak load of 48,632 MW). Therefore, LWU's potential deficiency represents 0.14% (37.44 MW of 26,768 MW) of the regional UFLS requirement. Additionally, LWU comprises 0.06% of the Regional transmission system and 0.2% of the regional load and generation. The risk is further reduced as there is no flow through LWU as LWU only has two tie-lines which run in parallel and connect LWU to the same Florida Power & Light substation.</p> <p>No harm is known to have occurred.</p>	9/4/2009 (when FRCC completed its prior Compliance Audit of LWU and did not have a finding)	9/4/2016 (Mitigation Plan completion)	\$70,000 (for FRCC2014013685, FRCC2014013686, and FRCC2014013687)	Compliance Audit	<p>To mitigate this violation LWU:</p> <ol style="list-style-type: none"> 1) performed an inventory of all UFLS equipment; 2) validated/updated LWU's UFLS program document to ensure all UFLS equipment has defined maintenance and testing intervals; 3) verified that all UFLS relay settings correspond with the data provided in PRC 006-1 R8 and R9; 4) verified that all UFLS equipment has been maintained and tested within the defined intervals; 5) reported any additional non-compliance occurrences to the FRCC Compliance staff; 6) created/updated procedure(s) to include identifying changes in UFLS equipment, procedures for changes in UFLS equipment, processes/studies for changes in UFLS equipment, and notifications to be made for changes in UFLS equipment; and 7) assigned individuals to primary and secondary responsibilities for review and validation of the PRC-008 procedures and documentation. 	9/4/2016	9/19/2016	Does Not Contest

Other Factors Affecting the Penalty Determination, including Compliance History, Internal Compliance Program and Compliance Culture

On December 16, 2014, FRCC and LWU originally executed a Settlement Agreement to resolve these violations for a \$0 penalty in exchange for LWU performing a number of above and beyond activities. After execution of the prior Settlement Agreement, LWU failed to complete its three Mitigation Plans and was tardy in its completion of the above and beyond activities agreed to in the Settlement Agreement. LWU's Mitigation Plans were due for completion by December 17, 2014 and were still incomplete as of August 26, 2015. LWU's above and beyond activities were due January 30, 2015 and not completed until June 10, 2015. LWU failed to provide any notification to FRCC regarding its inability to meet any of these deadlines. After several months of attempted contact, FRCC rescinded the Settlement Agreement and on September 3, 2015, issued a Notice of Alleged Violation and Proposed Penalty or Sanction (NOAV) assessing the penalty amount of \$42,000.

On September 14, 2015, LWU submitted requests for Mitigation Plan Extensions for all three of its previously accepted plans. LWU's explanation for the requested extensions was its loss of available technical staff due to attrition. LWU stated that since the loss of its technical personnel, it had entered into a contract with an independent engineering company to provide the proper resources to ensure completion of the Mitigation Plan activities and address future compliance.

After FRCC issued the NOAV, LWU continued to fail to meet agreed-upon milestone completion dates without seeking an extension. In response, FRCC issued a second NOAV in which it removed all credits from the penalty calculation and assessed the current penalty amount of \$70,000.

Above and beyond actions agreed upon in the initial settlement agreement included the following.

LWU implemented a technology solution for a term of 3 years to track and comply with all NERC Reliability Standards including, but not limited to, the Critical Infrastructure Protection (CIP) and Operations and Planning (O & P) requirements. Objectives of the technology solution includes:

- 1) review of compliance requirements for Reliability Standards;
- 2) validation of compliance with current NERC Reliability Standards and recommendations for internal controls to ensure continued compliance;
- 3) review of documentation to support self-identified possible violations prior to submittal to FRCC;
- 4) review of Mitigation Plans developed for non-compliances prior to submittal to FRCC;
- 5) review of LWU internal compliance program documentation for improvements;
- 6) performance of periodic spot checks of Reliability Standards; and,
- 7) performance of mock audits on an annual basis.

The implementation for the technology solution for the above activities was due by January 30, 2015 and was not implemented until June 10, 2015.

On January 31, 2011, NERC filed a Settlement Agreement covering violations of FAC-008-1 R1 and FAC-009-1 R1 for LWU with FERC under NP11-96-000. On March 2, 2011, FERC issued an order stating it would not engage in further review of the Notice of Penalty.

FRCC determined that LWU's compliance history should not serve as a basis for aggravating the original penalty. While the violations were of the same and similar Reliability Standards, the facts and circumstances for the violations differed. The prior violations resulted from LWU's failure to demonstrate that its Facility Ratings methodology document included all applicable equipment and criteria while the instant violation resulted from LWU's failure to establish Facility Ratings consistent with the associated Facility Ratings methodology document.

On December 16, 2014, FRCC and LWU originally executed a Settlement Agreement to resolve these violations for a \$0 penalty in exchange for LWU performing a number of above and beyond activities. After execution of the prior Settlement Agreement, LWU failed to complete its three Mitigation Plans and was tardy in its completion of the above and beyond activities agreed to in the Settlement Agreement. LWU's Mitigation Plans were due for completion by December 17, 2014 and were still incomplete as of August 26, 2015. LWU's above and beyond activities were due January 30, 2015 and not completed until June 10, 2015. LWU failed to provide any notification to FRCC regarding its inability to meet any of these deadlines. After several months of attempted contact, FRCC rescinded the Settlement Agreement and on September 3, 2015, issued a Notice of Alleged Violation and Proposed Penalty or Sanction (NOAV) assessing the penalty amount of \$42,000.

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- 1) review of compliance requirements for Reliability Standards;
- 2) validation of compliance with current NERC Reliability Standards and recommendations for internal controls to ensure continued compliance;
- 3) review of documentation to support self-identified possible violations prior to submittal to FRCC;
- 4) review of Mitigation Plans developed for non-compliances prior to submittal to FRCC;
- 5) review of LWU internal compliance program documentation for improvements;
- 6) performance of periodic spot checks of Reliability Standards; and,
- 7) performance of mock audits on an annual basis.

The implementation for the technology solution for the above activities was due by January 30, 2015 and was not implemented until June 10, 2015.

On December 16, 2014, FRCC and LWU originally executed a Settlement Agreement to resolve these violations for a \$0 penalty in exchange for LWU performing a number of above and beyond activities. After execution of the prior Settlement Agreement, LWU failed to complete its three Mitigation Plans and was tardy in its completion of the above and beyond activities agreed to in the Settlement Agreement. LWU's Mitigation Plans were due for completion by December 17, 2014 and were still incomplete as of August 26, 2015. LWU's above and beyond activities were due January 30, 2015 and not completed until June 10, 2015. LWU failed to provide any notification to FRCC regarding its inability to meet any of these deadlines. After several months of attempted contact, FRCC rescinded the Settlement Agreement and on September 3, 2015, issued a Notice of Alleged Violation and Proposed Penalty or Sanction (NOAV) assessing the penalty amount of \$42,000.

On September 14, 2015, LWU submitted requests for Mitigation Plan Extensions for all three of its previously accepted plans. LWU's explanation for the requested extensions was its loss of available technical staff due to attrition. LWU stated that since the loss of its technical personnel, it had entered into a contract with an independent engineering company to provide the proper resources to ensure completion of the Mitigation Plan activities and address future compliance.

After FRCC issued the NOAV, LWU continued to fail to meet agreed-upon milestone completion dates without seeking an extension. In response, FRCC issued a second NOAV in which it removed all credits from the penalty calculation and assessed the current penalty amount of \$70,000.

Above and beyond actions agreed upon in the initial settlement agreement included the following.

LWU implemented a technology solution for a term of 3 years to track and comply with all NERC Reliability Standards including, but not limited to, the Critical Infrastructure Protection (CIP) and Operations and Planning (O & P) requirements. Objectives of the technology solution includes:

- 1) review of compliance requirements for Reliability Standards;
- 2) validation of compliance with current NERC Reliability Standards and recommendations for internal controls to ensure continued compliance;
- 3) review of documentation to support self-identified possible violations prior to submittal to FRCC;
- 4) review of Mitigation Plans developed for non-compliances prior to submittal to FRCC;
- 5) review of LWU internal compliance program documentation for improvements;
- 6) performance of periodic spot checks of Reliability Standards; and,
- 7) performance of mock audits on an annual basis.

The implementation for the technology solution for the above activities was due by January 30, 2015 and was not implemented until June 10, 2015.

Attachment B

LWU's Notice of Possible Violation for FAC-009-1 R1, PRC-005-1 R2.1 and R2.2, and PRC-008-0 R1, dated May 6, 2014



FLORIDA RELIABILITY COORDINATING COUNCIL, INC.
3000 BAYPORT DRIVE, SUITE 600
TAMPA, FLORIDA 33607-8411
PHONE 813.289.5644 • FAX 813.289.5646
WWW.FRCC.COM

VIA ENTITY SECURE FILE TRANSFER

**Notice of Possible Violation
(NPV)**

May 6, 2014

Walt Gill
Manager of Systems Operations
City of Lake Worth
1900 2nd Avenue
Lake Worth, FL 33461

**Re: Notice of Possible Violation
FRCC Tracking Number: (See Table 1)
NERC Tracking Number: (See Table 1)**

Dear Mr. Gill,

This letter is to notify you that the Florida Reliability Coordinating Council, Inc. (FRCC) Compliance Enforcement Staff has completed a formal assessment to determine the City of Lake Worth's (LWU) compliance with respect to the Reliability Standard listed in Attachment A, Table 1, of this letter. As a result of FRCC's review of LWU's evidence following LWU's Compliance Audit dated March 25, 2014, the FRCC has determined there is a sufficient basis for finding that LWU's violations may not be or were not in compliance with the Reliability Standard Requirements listed in Attachment A, Table 1 and will be treated as Spreadsheet Notice of Penalty (SNOP) or Notice of Penalty (NOP).

If you have not previously received a data hold request, this letter serves as an official notice to preserve all documentation pertaining to the Possible Violations. Documentation includes, but is not limited to — operator logs, recorded voice communications, email and written correspondence, work orders, inspection records, patrol records, budget information, photographs, system logs, and any other documents that may be directly or indirectly related to the Possible Violations.

If you have not already done so, the FRCC encourages you to review the circumstances of the subject issue and immediately submit Mitigation Plans. A separate Mitigation Plan is required for each Reliability Standard in this notice. The Mitigation Plans should be completed without delay. The violations may be subject to penalties calculated on a "per day" basis until the violations are fully mitigated or until held in abeyance through an accepted and approved Mitigation Plan.



FLORIDA RELIABILITY COORDINATING COUNCIL, INC.
3000 BAYPORT DRIVE, SUITE 600
TAMPA, FLORIDA 33607-8411
PHONE 813.289.5644 • FAX 813.289.5646
WWW.FRCC.COM

Formal Mitigation Plans should be submitted through the FRCC Compliance Tracking & Submittal (CTS) system. Please note that a Mitigation Plan submittal does not constitute an admission a violation has occurred, nor does it waive your right to contest a Notice of Alleged Violation and Proposed Penalty or Sanction (NOAV) letter, if it is delivered.

The violations for LWU are possible candidates for including in settlement discussions. If LWU prefers to settle the violations, you should notify FRCC Compliance in writing by completing the "Request for Settlement" template located at:

<https://www.frcc.com/Compliance/FRCCCompliance/default.aspx>

and submit it to enforcement@frcc.com. Please provide your response by **May 13, 2014**. Include the NERC Tracking number(s) that you would like to have included in the settlement discussions.

As required by the NERC Rules of Procedure and NERC Compliance Monitoring and Enforcement Program, the information in this notice will be provided on a non-public basis to the Federal Energy Regulatory Commission (FERC). The information regarding the non-compliance or violation will not be made public unless and until a Notice of Penalty (NOP) is sent to FERC.

Please include the NERC tracking number(s) indicated in Attachment A, Table 1, on any correspondence to the FRCC regarding this matter.

The FRCC appreciates your cooperation in advance and looks forward to resolving this matter in the interests of promoting the reliability of the Bulk Power System.

If you have any questions, please feel free to contact me at 813-207-7972.

Respectfully,

MICHELLE JOHNSON
Manager of Compliance Enforcement
mjohnson@frcc.com

MJ/ah

cc: Linda Campbell, FRCC
NERC



Attachment A

Table 1

Date of Violation	Reg. Entity	Reliability Standard	Req.	Source of Violation	NERC Tracking Number	FRCC Tracking Number
9/11/2009	LWU	FAC-009-1	R1	Compliance Audit	FRCC2014013685	FRCC2014-100800
Brief Description	During a Compliance Audit conducted in March 2014, FRCC determined that LWU's evidence was not sufficient to demonstrate that LWU has established Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings methodology or documentation for determining its Facility Ratings. For two Facilities, the Facility Ratings do not include buses or jumpers as required by LWU's Facility Ratings methodology document. Additionally, LWU's Facility Ratings methodology document includes criteria for generator bus ducts, generator circuit breakers, and generator step-up transformers for its BES generating units, though no evidence of Facility Ratings for two generating units were provided.					
9/4/2009	LWU	PRC-005-1	R2	Compliance Audit	FRCC2014013686	FRCC2014-100801
Brief Description	During a Compliance Audit conducted in March 2014, FRCC determined that LWU's evidence was not sufficient to demonstrate that LWU has a complete Protection System maintenance and testing program, and when requested, LWU did not provide the entire implementation of that program to the FRCC within 30 calendar days. The documentation of the program implementation did not include evidence that all Protection System devices were maintained and tested within the defined intervals and the date each Protection System device was last tested/maintained. Evidence was not provided that four relays and one communication system were tested and maintained in accordance with LWU's Protection System maintenance and testing program. Additionally, the evidence provided for four relays was not sufficient to demonstrate that the relays were tested and maintained.					
9/4/2009	LWU	PRC-008-0	R2	Compliance Audit	FRCC2014013687	FRCC2014-100802
Brief Description	During a Compliance Audit conducted in March 2014, FRCC determined that LWU's evidence was not sufficient to demonstrate that LWU implemented its entire Under Frequency Load Shedding (UFLS) equipment maintenance and testing program, and when requested, LWU did not provide its complete UFLS maintenance and testing program results to the FRCC within 30 calendar days. LWU has a total of 28 feeder circuits in its Automatic Load Shedding Program. For twelve feeder circuits, the test results provided did not match the relay settings provided on the LWU Automatic Load Shedding Program Summary. For one feeder circuit, the evidence was not sufficient to demonstrate the UFLS equipment maintenance and testing program had been implemented. For six feeder circuits, evidence was not provided to the FRCC within 30 calendar days upon request.					

Attachment C

Record documents for the violation of FAC-009-1 R1

**C-1. LWU's Mitigation Plan designated as
FRCCMIT010853 submitted July 23, 2014**

**C-2. LWU's Mitigation Plan Extension
Request submitted September 14, 2015**

**C-3. LWU's Certification of Mitigation Plan
Completion dated September 15, 2016**

**C-4. FRCC's Verification of Mitigation Plan
Completion dated September 20, 2016**

VIEW MITIGATION PLAN: FAC-009-1 (REGION REVIEWING MITIGATION PLAN)

This item was signed by Walt Gill (wgill@lakeworth.org) on 7/23/2014

This item was marked ready for signature by Walt Gill (wgill@lakeworth.org) on 7/23/2014

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.

[Yes] 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: Lake Worth, City of

Company Address: 1900 2nd Avenue N.

Lake Worth, Florida 33460

Compliance Registry ID: NCR00043

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

Name: Walt Gill

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 Reliability Standard listed below.

Standard: FAC-009-1

Table with 4 columns: Requirement, Regional ID, NERC Violation ID, Date Issue Reported. Row 1: R1, FRCC2014-100800, FRCC2014013685, 3/25/2014

C.2 Identify the cause of the Alleged or Confirmed violation(s) identified above:

LWU's evidence was not sufficient to demonstrate that LWU has established Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings methodology or documentation for determining its Facility Ratings. For two Facilities, the Facility Ratings do not include buses or jumpers as required by LWU's Facility Ratings methodology document. Additionally, LWU's Facility Ratings methodology document includes criteria for generator bus ducts, generator circuit breakers, and generator step-up transformers for its BES generating units, though no evidence of Facility Ratings for two generating units were provided.

Attachments ()

C.3 Provide any additional relevant information regarding the Alleged or Confirmed violations associated with this MitigationPlan:

The alleged violation was discovered during an Off Site O&P Compliance Audit conducted in March 2014

Attachments ()

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:

CLWU will accomplish the following:

- Verify all applicable components are included and have the correct normal and emergency Ratings
-Validate/update the Facility Ratings with the associated Methodology
-Notify the RC and applicable TOP(s) of updated Ratings and SOLs
-Verify/update system and station one-line diagrams with the correct configuration, appropriate identification, and sufficient labeling of component parameters
-Create/update procedure(s) to include: identifying changes in Facility Ratings; procedures to be updated for changes in Facility Ratings (i.e. FAC-008); processes/studies to be updated for changes in Facility Ratings (those for compliance with IRO, FAC, TOP, TPL and other Reliability Standards); notifications to be made for changes in Facility Ratings (RC, BAs, TO/TOPs, GO/GOPs)
-Update SCADA/EMS to the correct ratings and operating limits
-Verify/update SOLs for associated Facility Ratings changes
-Assign individuals to primary and secondary responsibilities for review and validation of the FAC-008 procedures and documentation

-Train the operating personnel on the updated Ratings, operating limits, and procedural change

[Attachments \(\)](#)

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:

12/17/2014

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

[Verify-Validate-Update-](#)

Milestone Pending (Due: 9/18/2014)

- Verify all applicable components are included and have the correct normal and emergency Ratings
- Validate/update the Facility Ratings with the associated Methodology
- Verify/update system and station one-line diagrams with the correct configuration, appropriate identification, and sufficient labeling of component parameters

[Procedures-Notifications-Updates](#)

Milestone Pending (Due: 11/15/2014)

- Create/update procedure(s) to include: identifying changes in Facility Ratings; procedures to be updated for changes in Facility Ratings (i.e. FAC-008); processes/studies to be updated for changes in Facility Ratings (those for compliance with IRO, FAC, TOP, TPL and other Reliability Standards); notifications to be made for changes in Facility Ratings (RC, BAs, TO/TOPs, GO/GOPs)
- Notify the RC and applicable TOP(s) of updated Ratings and SOLs
- Update SCADA/EMS to the correct ratings and operating limits
- Verify/update SOLs for associated Facility Ratings changes

[Assign-Train Personnel-Complete Mitigation Plan](#)

Milestone Pending (Due: 12/17/2014)

- Assign individuals to primary and secondary responsibilities for review and validation of the FAC-008 procedures and documentation
- Train the operating personnel on the updated Ratings, operating limits, and procedural change

SECTION E: INTERIM AND FUTURE RELIABILITY RISK

E.1 Abatement of Interim BPS Reliability Risk: While your organization is implementing this Mitigation Plan the reliability of the Bulk Power Supply (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):

Minimum Risk to the BES

[Attachments \(\)](#)

E.2 Prevention of Future BPS Reliability Risk: 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):

CLWU will provide documentation when requested to show and demonstrate compliance as well as have updated procedures, assign back-up personnel and conduct periodic training of personnel

[Attachments \(\)](#)

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 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:
 - I am Walt Gill of Lake Worth, City of
 - I am qualified to sign this Mitigation Plan on behalf of Lake Worth, City of
 - I understand Lake Worth, City of'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 (Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation (NERC CMEP))
 - I have read and am familiar with the contents of this Mitigation Plan
 - Lake Worth, City of agrees to comply with, this Mitigation Plan, including the timetable completion date, as accepted by FRCC and approved by NERC

SECTION G: REGIONAL ENTITY CONTACT

Please direct any questions regarding completion of this form to:

Barry Pagel

Director of Compliance

FRCC

813-207-7968

bpagel@frcc.com

This item was signed by Walt Gill (wgill@lakeworth.org) on 9/14/2015



This item was marked ready for signature by Walt Gill (wgill@lakeworth.org) on 9/14/2015



MEMBER MITIGATION PLAN EXTENSION

SECTION A: REGISTERED ENTITY MITIGATION PLAN INFORMATION

Entity Name:

Lake Worth, City of

Standard:

FAC-009-1

Requirement ID(s):

R1.

NERC Violation ID(s):

FRCC2014013685

Original Mitigation Plan Expected Completion Date:

12/17/2014

SECTION B: EXTENSION REQUEST REQUIREMENTS

Proposed Mitigation Plan Completion Date (must occur after 12/17/2014):

11/13/2015

Identify the reason an extension is being requested:

CLWU NCR00043 has entered into contract with Leidos Engineering for aid in ensuring the mitigation plan is closed properly with the correct data and this is the completion date that Leidos has provided as completing

Provide detailed information as to why the original completion date will not be met:

Due to an abundant amount of staff leaving the CLWU, The CLWU did not have the proper technical resources on site to ensure proper completion. CLWU has since entered into contract with Leidos Engineering to provide the proper resources to ensure completion and compliance

SECTION D.3: MILESTONE ACTIVITY

Verify-Validate-Update-

Milestone Pending (Due: 9/18/2014)

- Verify all applicable components are included and have the correct normal and emergency Ratings
- Validate/update the Facility Ratings with the associated Methodology
- Verify/update system and station one-line diagrams with the correct configuration, appropriate identification, and sufficient labeling of component parameters

Procedures-Notifications-Updates

Milestone Pending (Due: 11/15/2014)

- Create/update procedure(s) to include: identifying changes in Facility Ratings; procedures to be updated for changes in Facility Ratings (i.e. FAC-008); processes/studies to be updated for changes in Facility Ratings (those for compliance with IRO, FAC, TOP, TPL and other Reliability Standards); notifications to be made for changes in Facility Ratings (RC, BAs, TO/TOPs, GO/GOPs)
- Notify the RC and applicable TOP(s) of updated Ratings and SOLs
- Update SCADA/EMS to the correct ratings and operating limits
- Verify/update SOLs for associated Facility Ratings changes

Assign-Train Personnel-Complete Mitigation Plan

Milestone Pending (Due: 12/17/2014)

- Assign individuals to primary and secondary responsibilities for review and validation of the FAC-008 procedures and documentation
- Train the operating personnel on the updated Ratings, operating limits, and procedural change

This item was signed by Ralph Anderson (randerson@lakeworth.org) on 9/15/2016

This item was marked ready for signature by Ralph Anderson (randerson@lakeworth.org) on 9/15/2016

MEMBER MITIGATION PLAN CLOSURE

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) Data or information submitted may become part of a public record upon final disposition of the possible violation, therefore any confidential information contained therein should be marked as such in accordance with the provisions of Section 1500 of the NERC Rules of Procedure.

Name of Registered Entity submitting certification:

Lake Worth, City of

Name of Standard of mitigation violation(s):

FAC-009-1

Requirement	Tracking Number	NERC Violation ID
R1.	FRCC2014-100800	FRCC2014013685

Date of completion of the Mitigation Plan:

9/1/2016

Verify-Validate-Update-

Milestone Completed (Due: 9/18/2014 and Completed 2/17/2016)

[Attachments \(0\)](#)

- Verify all applicable components are included and have the correct normal and emergency Ratings
- Validate/update the Facility Ratings with the associated Methodology
- Verify/update system and station one-line diagrams with the correct configuration, appropriate identification, and sufficient labeling of component parameters

Procedures-Notifications-Updates

Milestone Completed (Due: 11/15/2014 and Completed 11/13/2015)

[Attachments \(0\)](#)

- Create/update procedure(s) to include: identifying changes in Facility Ratings; procedures to be updated for changes in Facility Ratings (i.e. FAC-008); processes/studies to be updated for changes in Facility Ratings (those for compliance with IRO, FAC, TOP, TPL and other Reliability Standards); notifications to be made for changes in Facility Ratings (RC, BAs, TO/TOPs, GO/GOPs)
- Notify the RC and applicable TOP(s) of updated Ratings and SOLs
- Update SCADA/EMS to the correct ratings and operating limits
- Verify/update SOLs for associated Facility Ratings changes

Assign-Train Personnel-Complete Mitigation Plan

Milestone Completed (Due: 12/17/2014 and Completed 2/12/2016)

[Attachments \(0\)](#)

- Assign individuals to primary and secondary responsibilities for review and validation of the FAC-008 procedures and documentation
- Train the operating personnel on the updated Ratings, operating limits, and procedural change

Revise Procedure, verify SCADA, notify as applicable

Milestone Completed (Due: 9/1/2016 and Completed 9/1/2016)

[Attachments \(0\)](#)

- Create/update procedure(s) to include: identifying changes in Facility Ratings; procedures to be updated for changes in Facility Ratings (i.e. FAC-008); processes/studies to be updated for changes in Facility Ratings (those for compliance with IRO, FAC, TOP, TPL and other Reliability Standards); notifications to be made for changes in Facility Ratings (RC, BAs, TO/TOPs, GO/GOPs)
- Notify the RC and applicable TOP(s) of updated Ratings and SOLs
- Update SCADA/EMS to the correct ratings and operating limits
- Verify/update SOLs for associated Facility Ratings changes

Summary of all actions described in Part D of the relevant mitigation plan:

Complete on or before 9/1/2016

- Create/update procedure(s) to include: identifying changes in Facility Ratings; procedures to be updated for changes in Facility Ratings (i.e. FAC-008); processes/studies to be updated for changes in Facility Ratings (those for compliance with IRO, FAC, TOP, TPL and other Reliability Standards); notifications to be made for changes in Facility Ratings (RC, BAs, TO/TOPs, GO/GOPs)
- Notify the RC and applicable TOP(s) of updated Ratings and SOLs
- Update SCADA/EMS to the correct ratings and operating limits
- Verify/update SOLs for associated Facility Ratings changes
- Assign individuals to primary and secondary responsibilities for review and validation of the FAC-008 procedures and documentation
- Train the operating personnel on the updated Ratings, operating limits, and procedural change
- Create/update procedure(s) to include: identifying changes in Facility Ratings; procedures to be updated for changes in Facility Ratings (i.e. FAC-008);

processes/studies to be updated for changes in Facility Ratings (those for compliance with IRO, FAC, TOP, TPL and other Reliability Standards); notifications to be made for changes in Facility Ratings (RC, BAs, TO/TOPs, GO/GOPs)

- Notify the RC and applicable TOP(s) of updated Ratings and SOLs
- Update SCADA/EMS to the correct ratings and operating limits
- Verify/update SOLs for associated Facility Ratings changes

Description of the information provided to FRCC for their evaluation *

- 1_ Facility Ratings Closure Information (Summary)
- 2_CLWU Facilities Rating Methodology
- 3_Notifications of ratings
- 4_CLWU Facility Ratings
- 5_SCADA_EMS changes due to Facility Ratings
- 6_System Overview
- 7_FAC-008-3 Training
- 8_Training sign in

I certify that the Mitigation Plan for the above-named violation has been completed on the date shown above. In doing so, I certify that all required Mitigation Plan actions described in Part D of the relevant Mitigation Plan have been completed, compliance has been restored, the above-named entity is currently compliant with all of the requirements of the referenced standard, and that all information submitted is complete, true and correct to the best of my knowledge.

RAM MP Verification of Completion Form

Basic Information

FRCC Control Number / NERC Id:	FRCC2014-100800 / FRCC2014013685
Mitigation Plan NERC Id:	FRCCMIT010853
NRC Number:	NCR00043
Registered Entity:	Lake Worth, City of
Standard:	FAC-009-1
Requirement (Sub-requirements/Parts):	R1
Discovery Method:	Off-Site Audit
Date Violation Reported:	3/25/2014
Certified Complete:	3/2/2016
Actual Completion Date:	9/4/2016
Region Verification Completed:	9/20/2016
Violation Start Date:	9/11/2009
Violation End Date:	9/4/2016
Recommended Disposition:	<p>Mitigation Plan Accepted on 07/23/2014 with expected completion of 12/17/2014. Extension requested on 9/14/2015 and approved on 9/15/2015 with a proposed completion of 11/13/2015. Subsequent revision was submitted and accepted on 8/5/2016 with an expected completion of 9/1/2016.</p> <p>Mitigation Plan was completed on 09/04/2016 and is recommended for verification acceptance and closure.</p> <p>The Mitigation Plan for FRCC2014013685 and evidence provided in the list of files above brings LWU back into compliance on 09/04/2016 (milestone 2 completion) and was sufficient to demonstrate that LWU has corrected the Facilities Ratings issues, updated the procedures to prevent reoccurrence, and trained appropriate personnel.</p>

Description of Mitigating Activities

Evidence Located in Compliance Restricted/LWU at:

MS1, MS2, MS3: RAM.2016-05-11.034

MS1, MS2, MS3: ENF.2016-05-16.002

MS1, MS2, MS3: MIT.2016-09-02.001

Deadline for Completion	MIL #	Milestone	Milestone Summaries – Date Completed	Milestone# - Evidence - Filename
09/18/2014	1	-Verify all applicable components are included and have the correct normal and emergency Ratings -Validate/update the Facility Ratings with the associated Methodology -Verify/update system and station one-line diagrams with the correct configuration, appropriate identification, and sufficient labeling of component parameters	Evidence provided shows: Document with combined facility ratings dated 1/28/16. Document supplied was Rev 2, dated 11/13/15 along with ratings of equipment which appear to have been created following the methodology. Documents provided including updated one-line for transmission components appear to show all facilities have been rated in accordance with methodology and labeled. Completed: 2/17/2016	<ul style="list-style-type: none"> • Combined Facility Ratings.pdf • LWU 063 Lake Worth System One Line 08 07 2015 BES_LWUbes0807.pdf • LWU Documentation of Results – BES 08 17 2015 FRCC Signed.pdf • 0 - Index of evidence.pdf • Attachment 1 - Combined Facility Ratings Rev 1.pdf • Attachment 2 – CLWU FAC-008-3.pdf • Attachment 3 138 KV BUS Overview.pdf • 1_ Facility Ratings Closure Information.pdf • 2_CLWU Facilities Rating Methodology.pdf • 4_CLWU Facility Ratings.pdf • 6_System Overview.pdf
11/15/2014	2	-Create/update procedure(s) to include: identifying changes in Facility Ratings; procedures to be updated for changes in Facility Ratings (i.e. FAC-008); processes/studies to be updated for	Evidence provided shows: Updated procedure to cover a process of what to do when a Facility Rating changes, what procedures, processes/studies should be reviewed and updated in those situations, including appropriate notifications. LWU validated no updated to	<ul style="list-style-type: none"> • CLWU FAC-008-3.pdf • 0 - Index of evidence.pdf • Attachment 2 – CLWU FAC-008-3.pdf • Attachment 4 EMS Ratings Limits.pdf • 1_ Facility Ratings Closure Information.pdf • 2_CLWU Facilities Rating Methodology.pdf • 3_Notifications of ratings.pdf • 5_SCADA_EMS changes due to Facility Ratings.pdf

		<p>changes in Facility Ratings (those for compliance with IRO, FAC, TOP, TPL and other Reliability Standards); notifications to be made for changes in Facility Ratings (RC, BAs, TO/TOPs, GO/GOPs)</p> <ul style="list-style-type: none"> -Notify the RC and applicable TOP(s) of updated Ratings and SOLs -Update SCADA/EMS to the correct ratings and operating limits -Verify/update SOLs for associated Facility Ratings changes 	<p>ratings, LWU has no SOL's.</p> <p>Document provided attests to updates to SCADA/EMS.</p> <p>LWU validated no updated to ratings, LWU has no SOL's.</p> <p>Completed: 9/4/2016</p>	
-12/17/2014	-3	<ul style="list-style-type: none"> -Assign individuals to primary and secondary responsibilities for review and validation of the FAC-008 procedures and documentation -Train the operating personnel on the updated Ratings, operating limits, and procedural change 	<p>Evidence provided shows.</p> <p>Document provided defines responsibilities in Section 3.0</p> <p>Documents provided show training presentation used as well as training sign-in log.</p> <p>Completed: 2/12/2016</p>	<ul style="list-style-type: none"> • FAC-008-3 Facility Training Sign-in sheet_01272016.pdf • FAC-008-3 Training Slides.pdf • FAC-008-3_TRAINING_SIGN-IN.pdf • 0 - Index of evidence.pdf • Attachment 2 – CLWU FAC-008-3.pdf • Attachment 5 FAC-008-3 Training Slides.pptx • Attachment 6 FAC-008-3_TRAINING_SIGN-IN.pdf • 1_ Facility Ratings Closure Information.pdf • 7_FAC-008-3 Training.pdf • 8_Training sign in.pdf

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-

Data/Information Requests and Responses

Question:

1. With regards to Milestone 2, please identify the specific locations within the evidence provided where the mitigating activities in the milestone to be performed are addressed. If the evidence provided does not address these mitigating activities, please submit any additional evidence required to show these mitigating activities have been included in appropriate documentation.

Due Date:	06/16/2016	Response Received:	
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Date Reviewed:	
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Review Comments:

No direct response. Voice conversations indicate procedures were not appropriately updated. Revision to mitigation plan will be needed.

Subsequent revision requested with above activities remaining the same and new estimated completion date.

Attachment D

Record documents for the violation of PRC-005-1 R2.1 and R2.2

D-1. LWU's Mitigation Plan designated as FRCCMIT010854-1 submitted August 5, 2016

D-2. LWU's Certification of Mitigation Plan Completion dated September 28, 2016

D-3. FRCC's Verification of Mitigation Plan Completion dated October 12, 2016

 [A previous version](#) of the this Mitigation Plan exists 

 This item was signed by Ralph Anderson (randerson@lakeworth.org) on 8/5/2016 

 This item was marked ready for signature by Ralph Anderson (randerson@lakeworth.org) on 8/5/2016 

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.

[Yes] 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:

Lake Worth, City of

Company Address:

1900 2nd Avenue N.

Lake Worth, Florida 33460

Compliance Registry ID:

NCR00043

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

Name:

Ralph Anderson

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 Reliability Standard listed below.

Standard:

PRC-005-1

Requirement	Regional ID	NERC Violation ID	Date Issue Reported
R2.	FRCC2014-100801	FRCC2014013686	3/25/2014

C.2 Identify the cause of the Alleged or Confirmed violation(s) identified above:

LWU's evidence was not sufficient to demonstrate that LWU has a complete Protection System maintenance and testing program, and when requested, LWU did not provide the entire implementation of that program to the FRCC within 30 calendar days. The documentation of the program implementation did not include evidence that all Protection System devices were maintained and tested within the defined intervals and the date each Protection System device was last tested/maintained. Evidence was not provided that four relays and one communication system were tested and maintained in accordance with LWU's Protection System maintenance and testing program. Additionally, the evidence provided for four relays was not sufficient to demonstrate that the relays were tested and maintained.

[Attachments \(\)](#)

C.3 Provide any additional relevant information regarding the Alleged or Confirmed violations associated with this MitigationPlan:

The alleged violation was discovered during an Off Site O&P Compliance Audit conducted in March 2014

[Attachments \(\)](#)

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:

CLWU has accomplished the following:

Perform an updated inventory based of PSMP elements. 164 total BES PSMP elements were identified, including 18 elements not originally identified by the consultant initially hired to perform the PSMP inventory. Mitigation Complete 08/04/2016.

Completed complete re-testing of 147 PSMP elements.

Underfrequency Load Testing was completed by 03/01/2016

Note: Generator Unit 1 is currently out of service due to a cable fault (all protection system equipment operated properly). A 138kV cable from the high side of Unit 1 Main power transformer to the 138kV overhead feeding the City failed. This leaves the City of Lake Worth on a radial line, and unable to serve a majority of the load until the cable repair is complete (09/30/2016).

[Attachments \(\)](#)

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:

9/30/2016

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

[Validate and complete any missed testing of the Protection System](#)

Milestone Pending (Due: 7/11/2016)

-Perform any missed maintenance and testing for identified transmission Protection System components.

-Verify all Protection System components have been maintained and tested within the defined intervals and have appropriate documentation of the completed maintenance and tests.

[Complete remaining testing and procedures to meet PRC-005-6](#)

Milestone Pending (Due: 9/30/2016)

Complete 8 remaining PSMP elements on Unit 2 generation as soon as Unit 2 is repaired on or before 09/20/2016

Obtain testing records from FPL on 9 PSMP elements newly identified. If FPL does not have or is unable to provide these documents, we will re-test the 9 PSMP elements on or before 9/30/2016

Complete one unresolved maintenance issue on an electro-mechanical relay that is slightly out of tolerance. (1%) This is a back-up relay with time delay, and the slight out of tolerance issue may cause it to trip the City of Lake Worth radial feed only. Relay has been sent in, being repaired by GE. Eta anticipated on or before 09/30/2016

Validate data on Underfrequency Load Shed and perform updates if needed on or before 9/30/2016.

Update PRC-005 to include all version 6 items on or before 9/30/2016.

Underfrequency relaying has been tested, verify test records and set points on or before 09/30/2016

SECTION E: INTERIM AND FUTURE RELIABILITY RISK

E.1 Abatement of Interim BPS Reliability Risk: While your organization is implementing this Mitigation Plan the reliability of the Bulk Power Supply (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):

Minimal risk to the BES. The biggest risk is to the City of Lake Worth.

[Attachments \(\)](#)

E.2 Prevention of Future BPS Reliability Risk: 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):

LWU has hired an experienced NERC specialist to ensure all procedures are written and followed to ensure minimal risk to the BES. In addition, unless new equipment is added, the next testing interval will be in 2022. In addition, Hypoluxo (BES tie) is being upgraded within the next year to microprocessor relays with continuous motioning of all protection system components with the exception of individual battery cell voltage. Battery voltage and charger, as well as the rest of the Protection system alarm on a failure in the control room.

[Attachments \(\)](#)

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 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:
 - I am Ralph Anderson of Lake Worth, City of
 - I am qualified to sign this Mitigation Plan on behalf of Lake Worth, City of
 - I understand Lake Worth, City of'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 (Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation (NERC CMEP))
 - I have read and am familiar with the contents of this Mitigation Plan

- Lake Worth, City of agrees to comply with, this Mitigation Plan, including the timetable completion date, as accepted by FRCC and approved by NERC

SECTION G: REGIONAL ENTITY CONTACT

Please direct any questions regarding completion of this form to:

Barry Pagel
Director of Compliance
FRCC
813-207-7968
bpagel@frcc.com

This item was signed by Ralph Anderson (randerson@lakeworth.org) on 9/28/2016

This item was marked ready for signature by Ralph Anderson (randerson@lakeworth.org) on 9/28/2016

MEMBER MITIGATION PLAN CLOSURE

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) Data or information submitted may become part of a public record upon final disposition of the possible violation, therefore any confidential information contained therein should be marked as such in accordance with the provisions of Section 1500 of the NERC Rules of Procedure.

Name of Registered Entity submitting certification:

Lake Worth, City of

Name of Standard of mitigation violation(s):

PRC-005-1

Requirement	Tracking Number	NERC Violation ID
R2.	FRCC2014-100801	FRCC2014013686

Date of completion of the Mitigation Plan:

9/28/2016

Validate and complete any missed testing of the Protection System

Milestone Completed (Due: 7/11/2016 and Completed 9/28/2016)

[Attachments \(0\)](#)

-Perform any missed maintenance and testing for identified transmission Protection System components.

-Verify all Protection System components have been maintained and tested within the defined intervals and have appropriate documentation of the completed maintenance and tests.

Complete remaining testing and procedures to meet PRC-005-6

Milestone Completed (Due: 9/30/2016 and Completed 9/28/2016)

[Attachments \(0\)](#)

Complete 8 remaining PSMP elements on Unit 2 generation as soon as Unit 2 is repaired on or before 09/20/2016

Obtain testing records from FPL on 9 PSMP elements newly identified. If FPL does not have or is unable to provide these documents, we will re-test the 9 PSMP elements on or before 9/30/2016

Complete one unresolved maintenance issue on an electro-mechanical relay that is slightly out of tolerance. (1%) This is a back-up relay with time delay, and the slight out of tolerance issue may cause it to trip the City of Lake Worth radial feed only. Relay has been sent in, being repaired by GE. Eta anticipated on or before 09/30/2016

Validate data on Underfrequency Load Shed and perform updates if needed on or before 9/30/2016.

Update PRC-005 to include all version 6 items on or before 9/30/2016.

Underfrequency relaying has been tested, verify test records and set points on or before 09/30/2016

Summary of all actions described in Part D of the relevant mitigation plan:

CLWU has performed:

any missed maintenance and testing for identified transmission Protection System components.

-Verify all Protection System components have been maintained and tested within the defined intervals and have appropriate documentation of the completed maintenance and tests.

Complete 8 remaining PSMP elements on Unit 2 generation as soon as Unit 2 is repaired on or before 09/20/2016

Re-test Hypoluxo communications and reclosing re-test the 9 PSMP

One unresolved maintenance issue on an electro-mechanical relay that is slightly out of tolerance. (1%) This is a back-up relay with time delay, and the slight out of tolerance issue may cause it to trip the City of Lake Worth radial feed only. Relay has been sent in, being repaired by GE. GE completed diagnostics and shipped the relay 9/28/2016. As soon as it arrives, CLWU will ensure calibration and install the relay. This is being tracked in ADMO

Validate data on Underfrequency Load Shed and perform updates if needed on or before 9/30/2016. (completed 9/9)

Update PRC-005 to include all version 6 items on or before 9/30/2016.

Underfrequency relaying has been tested, verify test records and set points on or before 09/30/2016 (completed on or about 9/9/2016)

In this data list you will find:

1. CLWU Guide to Evidence (this document)
2. CLWU Protection System Maintenance Program (PRC-005-6)
3. PRC-005 Test Records which is further divided into 3 major categories
 - a. This is a summary of all our PSMP data, test case used and various other information.
 - b. This is a listing of two Unresolved Maintenance issues as well as their potential impact to the BES, all the tracking documentation and approvals, and other relevant detail to demonstrate these two issues do not cause a negative impact to the BES.
 - c. Contains the component testing data from our power plant.
 - d. Contains the component testing data from our Main Yard Substation
 - e. Contains the component testing data from our Hypoluxo Substation
 - f. Contains the component testing data from our Canal Substation. While Canal is technically not part of the BES, we have included for your reference

I certify that the Mitigation Plan for the above-named violation has been completed on the date shown above. In doing so, I certify that all required Mitigation Plan actions described in Part D of the relevant Mitigation Plan have been completed, compliance has been restored, the above-named entity is currently compliant with all of the requirements of the referenced standard, and that all information submitted is complete, true and correct to the best of my knowledge.

RAM MP Verification of Completion Form

Basic Information

FRCC Control Number / NERC Id:	FRCC2014-100801 / FRCC2014013686
Mitigation Plan NERC Id:	FRCCMIT010854
NRC Number:	NCR00043
Registered Entity:	Lake Worth, City of
Standard:	PRC-005-1
Requirement (Sub-requirements/Parts):	R2
Discovery Method:	Off-Site Audit
Date Violation Reported:	3/25/2014
Certified Complete:	9/28/2016
Actual Completion Date:	9/27/2016
Region Verification Completed:	10/12/2016
Violation Start Date:	9/4/2009
Violation End Date:	9/27/2016
Recommended Disposition:	<p>Mitigation Plan Accepted on 07/23/2014 with expected completion of 12/17/2014. Extension requested on 9/14/2015 and approved on 9/16/2015 with a proposed completion of 11/27/2015. Subsequent revision submitted and accepted on 8/5/2016 with a proposed completion of 9/30/2016.</p> <p>Mitigation Plan was completed on 09/28/2016 and is recommended for verification acceptance and closure.</p> <p>The Mitigation Plan for FRCC2014013686 and evidence provided in the list of files above brings LWU back into compliance on 09/27/2016 (milestone 1 completion) and was sufficient to demonstrate that LWU has corrected the testing and maintenance issues, and updated the procedures to prevent reoccurrence.</p>

Description of Mitigating Activities

Evidence Located in Compliance Restricted/LWU at:

\\MIT.2016-09-28.101

Deadline for Completion	MIL #	Milestone	Milestone Summaries – Date Completed	Milestone# - Evidence - Filename
10/15/2014	1	-Perform an inventory of transmission Protection System components, including common devices and relaying at Hypoluxo -Validate/update LWU's Protection System maintenance and testing program document to ensure all transmission Protection System components have defined maintenance and testing intervals and a summary of maintenance and testing procedures -Verify all Protection System components have been maintained and tested within the defined intervals and have appropriate documentation of the completed maintenance and tests. -Perform any missed maintenance and testing for identified transmission	Evidence provided shows inventory completed, procedure updated, and test records for necessary components. Completed: 9/27/2016	<ul style="list-style-type: none"> • 1_CLWU Guide to evidence.pdf • 2_CLSU PRC-005-6 PSMP.pdf • 3_PRC005 TEST RECORDS (folder) contains inventory and testing records. • Subfolders: • 3a_CLWU PRC-005 Inventory.xlsx • 3b_UNRESOLVED MAINTENANCE • 3c_TOM SMITH POWER PLANT • 3d MAIN YARD SUBSTATION • 3e_HYPOLUXO STATION • 3f_CANAL SUBSTATION

		Protection System components		
12/17/2014	2	<p>-Report any additional non-compliance occurrences to the FRCC Compliance staff</p> <p>-Create/update procedure(s) to include: identifying changes in Protection Systems; procedures to be updated for changes in Protection Systems (i.e. PRC-001, PRC-005); processes/studies to be updated for changes in Protection Systems (those for compliance with PRC and other Reliability Standards); notifications to be made for changes in Protection Systems (RC, BAs, TO/TOPs, GO/GOPs)</p> <p>-Assign individuals to primary and secondary responsibilities for review and validation of the PRC-005 procedures and documentation</p>	<p>Evidence provided shows LWU updated procedure to reflect new PRC requirements, notifications, primary and secondary responsibilities, and inclusion of a new software (ADMO) tracking system.</p> <p>Completed: 09/04/2016</p>	<ul style="list-style-type: none"> • 1_CLWU Guide to evidence.pdf • 2_CLSU PRC-005-6 PSMP.pdf

Data/Information Requests and Responses

<u>Question:</u>			
Due Date:		Response Received:	
Date Reviewed:			
<u>Review Comments:</u>			

Attachment E

Record documents for the violation of PRC-008-0 R1

**E-1. LWU's Mitigation Plan designated as
FRCCMIT010854-1 submitted August 5, 2016**

**E-2. LWU's Certification of Mitigation Plan
Completion dated September 4, 2016**

**E-3. FRCC's Verification of Mitigation Plan
Completion dated September 19, 2016**

 [A previous version](#) of the this Mitigation Plan exists 

 This item was signed by Ralph Anderson (randerson@lakeworth.org) on 8/5/2016 

 This item was marked ready for signature by Ralph Anderson (randerson@lakeworth.org) on 8/5/2016 

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.

[Yes] 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:

Lake Worth, City of

Company Address:

1900 2nd Avenue N.

Lake Worth, Florida 33460

Compliance Registry ID:

NCR00043

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

Name:

Ralph Anderson

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 Reliability Standard listed below.

Standard:

PRC-008-0

Requirement	Regional ID	NERC Violation ID	Date Issue Reported
R2.	FRCC2014-100802	FRCC2014013687	3/25/2014

C.2 Identify the cause of the Alleged or Confirmed violation(s) identified above:

LWU's evidence was not sufficient to demonstrate that LWU implemented its entire Under Frequency Load Shedding (UFLS) equipment maintenance and testing program, and when requested, LWU did not provide its complete UFLS maintenance and testing program results to the FRCC within 30 calendar days. LWU has a total of 28 feeder circuits in its Automatic Load Shedding Program. For twelve feeder circuits, the test results provided did not match the relay settings provided on the LWU Automatic Load Shedding Program Summary. For one feeder circuit, the evidence was not sufficient to demonstrate the UFLS equipment maintenance and testing program had been implemented. For six feeder circuits, evidence was not provided to the FRCC within 30 calendar days upon request.

[Attachments \(\)](#)

C.3 Provide any additional relevant information regarding the Alleged or Confirmed violations associated with this MitigationPlan:

The alleged violation was discovered during an Off Site O&P Compliance Audit conducted in March 2014

[Attachments \(\)](#)

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:

CLWU will accomplish the following:

-Create/update procedure(s) to include: identifying changes in UFLS equipment; procedures to be updated for changes in UFLS equipment (i.e. PRC-006, PRC-008); processes/studies to be updated for changes in UFLS equipment (those for compliance with PRC and other Reliability Standards); notifications to be made for changes in UFLS equipment (PC, RC, TO/TOPs)

-Assign individuals to primary and secondary responsibilities for review and validation of the PRC-008 procedures and documentation

[Attachments \(\)](#)

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:

9/9/2016

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

[Verify-Update](#)

Milestone Completed (Due: 10/3/2014 and Completed 2/22/2016)

- Perform an inventory of all UFLS equipment
- Validate/update LWU's UFLS program document to ensure all UFLS equipment has defined maintenance and testing intervals
- Verify all UFLS relay settings correspond with the data provided in PRC-006-1 R8 and R9

[Report-Create-Assign-Complete Mitigation Plan](#)

Milestone Completed (Due: 12/17/2014 and Completed 11/27/2015)

- Report any additional non-compliance occurrences to the FRCC Compliance staff
- Create/update procedure(s) to include: identifying changes in UFLS equipment; procedures to be updated for changes in UFLS equipment (i.e. PRC-006, PRC-008); processes/studies to be updated for changes in UFLS equipment (those for compliance with PRC and other Reliability Standards); notifications to be made for changes in UFLS equipment (PC, RC, TO/TOPs)
- Assign individuals to primary and secondary responsibilities for review and validation of the PRC-008 procedures and documentation

[Revise Under-frequency Load Shed Maintenance Program](#)

Milestone Pending (Due: 9/9/2016)

- Create/update procedure(s) to include: identifying changes in UFLS equipment; procedures to be updated for changes in UFLS equipment (i.e. PRC-006, PRC-008); processes/studies to be updated for changes in UFLS equipment (those for compliance with PRC and other Reliability Standards); notifications to be made for changes in UFLS equipment (PC, RC, TO/TOPs)
- Assign individuals to primary and secondary responsibilities for review and validation of the PRC-008 procedures and documentation

SECTION E: INTERIM AND FUTURE RELIABILITY RISK

E.1 Abatement of Interim BPS Reliability Risk: While your organization is implementing this Mitigation Plan the reliability of the Bulk Power Supply (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):

Minimum Risk to the BES

[Attachments \(\)](#)

E.2 Prevention of Future BPS Reliability Risk: 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):

CLWU will provide documentation when requested to show and demonstrate compliance as well as have updated procedures, assign back-up personnel and conduct periodic training of personnel

[Attachments \(\)](#)

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 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:
 - I am Ralph Anderson of Lake Worth, City of
 - I am qualified to sign this Mitigation Plan on behalf of Lake Worth, City of
 - I understand Lake Worth, City of'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 (Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation (NERC CMEP))
 - I have read and am familiar with the contents of this Mitigation Plan
 - Lake Worth, City of agrees to comply with, this Mitigation Plan, including the timetable completion date, as accepted by FRCC and approved by NERC

SECTION G: REGIONAL ENTITY CONTACT

Please direct any questions regarding completion of this form to:

Barry Pagel

Director of Compliance

FRCC

813-207-7968

bpagel@frcc.com

This item was signed by Ralph Anderson (randerson@lakeworth.org) on 9/4/2016

This item was marked ready for signature by Ralph Anderson (randerson@lakeworth.org) on 9/4/2016

MEMBER MITIGATION PLAN CLOSURE

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) Data or information submitted may become part of a public record upon final disposition of the possible violation, therefore any confidential information contained therein should be marked as such in accordance with the provisions of Section 1500 of the NERC Rules of Procedure.

Name of Registered Entity submitting certification:

Lake Worth, City of

Name of Standard of mitigation violation(s):

PRC-008-0

Requirement	Tracking Number	NERC Violation ID
R2.	FRCC2014-100802	FRCC2014013687

Date of completion of the Mitigation Plan:

9/4/2016

[Verify-Update](#)

Milestone Completed (Due: 10/3/2014 and Completed 2/22/2016)

[Attachments \(0\)](#)

- Perform an inventory of all UFLS equipment
- Validate/update LWU's UFLS program document to ensure all UFLS equipment has defined maintenance and testing intervals
- Verify all UFLS relay settings correspond with the data provided in PRC-006-1 R8 and R9

[Report-Create-Assign-Complete Mitigation Plan](#)

Milestone Completed (Due: 12/17/2014 and Completed 11/27/2015)

[Attachments \(0\)](#)

- Report any additional non-compliance occurrences to the FRCC Compliance staff
- Create/update procedure(s) to include: identifying changes in UFLS equipment; procedures to be updated for changes in UFLS equipment (i.e. PRC-006, PRC-008); processes/studies to be updated for changes in UFLS equipment (those for compliance with PRC and other Reliability Standards); notifications to be made for changes in UFLS equipment (PC, RC, TO/TOPs)
- Assign individuals to primary and secondary responsibilities for review and validation of the PRC-008 procedures and documentation

[Revise Under-frequency Load Shed Maintenance Program](#)

Milestone Completed (Due: 9/9/2016 and Completed 9/4/2016)

[Attachments \(0\)](#)

- Create/update procedure(s) to include: identifying changes in UFLS equipment; procedures to be updated for changes in UFLS equipment (i.e. PRC-006, PRC-008); processes/studies to be updated for changes in UFLS equipment (those for compliance with PRC and other Reliability Standards); notifications to be made for changes in UFLS equipment (PC, RC, TO/TOPs)
- Assign individuals to primary and secondary responsibilities for review and validation of the PRC-008 procedures and documentation

Summary of all actions described in Part D of the relevant mitigation plan:

Completed the following:

- Create/update procedure(s) to include: identifying changes in UFLS equipment; procedures to be updated for changes in UFLS equipment (i.e. PRC-006, PRC-008); processes/studies to be updated for changes in UFLS equipment (those for compliance with PRC and other Reliability Standards); notifications to be made for changes in UFLS equipment (PC, RC, TO/TOPs)
- Assign individuals to primary and secondary responsibilities for review and validation of the PRC-008 procedures and documentation

Also, we converted PRC-008-0 and it is now under PRC-005-6, (as well as PRC-006)

Description of the information provided to FRCC for their evaluation *

Guide to evidence
 Procedure
 test data
 screen shoots
 notifications

I certify that the Mitigation Plan for the above-named violation has been completed on the date shown above. In doing so, I certify that all required Mitigation Plan actions described in Part D of the relevant Mitigation Plan have been completed, compliance has been restored, the above-named entity is currently compliant with all of the requirements of the referenced standard, and that all information submitted is complete, true and correct to the best of my knowledge.

RAM MP Verification of Completion Form

Basic Information

FRCC Control Number / NERC Id:	FRCC2014-100802 / FRCC2014013687
Mitigation Plan NERC Id:	FRCCMIT010855
NRC Number:	NCR00043
Registered Entity:	Lake Worth, City of
Standard:	PRC-008-0
Requirement (Sub-requirements/Parts):	R2
Discovery Method:	Off-Site Audit
Date Violation Reported:	3/25/2014
Certified Complete:	3/17/2016
Actual Completion Date:	9/4/2016
Region Verification Completed:	9/19/2016
Violation Start Date:	9/4/2009
Violation End Date:	9/4/2016
Recommended Disposition:	<p>Mitigation Plan Accepted on 07/23/2014 with expected completion of 12/17/2014. Extension requested on 9/14/2015 and approved on 9/16/2015 with a proposed completion of 10/30/2015. Subsequent revision submitted and accepted on 8/5/2016 with a proposed completion of 9/9/2016.</p> <p>Mitigation Plan was completed on 09/04/2016 and is recommended for verification acceptance and closure.</p> <p>The Mitigation Plan for FRCC2014013687 and evidence provided in the list of files above brings LWU back into compliance on 09/04/2016 (milestone 3 completion) and was sufficient to demonstrate that LWU has corrected the issues identified, updated the procedures to prevent reoccurrence, and notified appropriate personnel.</p>

Description of Mitigating Activities

Evidence Located in Compliance Restricted/LWU at:

MS1: RAM.2016-02-22.001\Milestone-1

MS2: RAM.2016-02-22.001\Milestone-2

MS1, MS2, MS3: MIT.2016-09-04.001

Deadline for Completion	MIL #	Milestone	Milestone Summaries – Date Completed	Milestone# - Evidence - Filename
10/3/2014	1	-Perform an inventory of all UFLS equipment -Validate/update LWU's UFLS program document to ensure all UFLS equipment has defined maintenance and testing intervals -Verify all UFLS relay settings correspond with the data provided in PRC-006-1 R8 and R9	Evidence provided shows inventory of all UFLS and completed testing. Completed: 2/22/2016	<ul style="list-style-type: none"> • Milestone Details.docx • CLWU_FRCC UFLS Data Form 2015_Rev1.xlsx • FMPA 2016 ARP UFLS IMPLEMENTATION System Data 1-28-2016.xls • PROTECTION SYSTEM MAINTENANCE PROGRAM.pdf • See also all test results in Milestone 2 information. • 1_CLWU Guide to evidence.pdf • FMPA 2016 ARP UFLS IMPLEMENTATION System Data 6-16-2016.xls • FMPA FRCC UFLS Data Form 2016 rev 0 (003) 6-16-2016.xlsx • UFLS_4th Ave_N_02172016 <ul style="list-style-type: none"> ○ 4R0401_ABB_PCD2000_UFLS_02172016.pdf ○ 4R0402_ABB_PCD2000_UFLS_02172016.pdf ○ 4R0404_ABB_PCD2000_UFLS_02172016.pdf • UFLS_6th Ave_S_02102016 <ul style="list-style-type: none"> ○ 4R0601_ABB_PCD2000_UFLS_02102016.pdf ○ 4R0602_ABB_PCD2000_UFLS_02102016.pdf ○ 4R0604_ABB_PCD2000_UFLS_02102016.pdf • UFLS_11th Ave_N_02122016 <ul style="list-style-type: none"> ○ 4R1101_ABB_PCD2000_UFLS_02172016.pdf ○ 4R1102_ABB_PCD2000_UFLS_02122016.pdf ○ 4R1103_ABB_PCD2000_UFLS_02172016.pdf • UFLS_12th Ave_S_02222016 <ul style="list-style-type: none"> ○ 4R1202_ABB_PCD2000_UFLS_02192019.pdf ○ 4R1203_ABB_PCD2000_UFLS_02192019.pdf ○ 4R1204_ABB_PCD2000_UFLS_02192019.pdf • UFLS_15th Ave_N_02092016

				<ul style="list-style-type: none"> o 4R1501_ABB_PCD2000_UFLS_02092016.pdf o 4R1502_ABB_PCD2000_UFLS_02092016.pdf o 4R1503_ABB_PCD2000_UFLS_02092016.pdf o 4R1504_ABB_PCD2000_UFLS_02092016.pdf • UFLS_18th Ave_N_02122016 <ul style="list-style-type: none"> o 4R1802_ABB_PCD2000_UFLS_02122016.pdf o 4R1803_ABB_PCD2000_UFLS_02122016.pdf o 4R1804_ABB_PCD2000_UFLS_02122016.pdf • UFLS_Canal_02042016 <ul style="list-style-type: none"> o 26B16002_Group1_351S_UFLS.pdf o 26B16002_Group2_351S_UFLS.pdf • UFLS_Main Yard_02032016 <ul style="list-style-type: none"> o 26B1W13_351S_UFLS_02032016.pdf
12/17/2014	2	<p>-Report any additional non-compliance occurrences to the FRCC Compliance staff</p> <p>-Create/update procedure(s) to include: identifying changes in UFLS equipment; procedures to be updated for changes in UFLS equipment (i.e. PRC-006, PRC-008); processes/studies to be updated for changes in UFLS equipment (those for compliance with PRC and other Reliability Standards); notifications to be made for changes in UFLS equipment (PC, RC, TO/TOPs)</p> <p>-Assign individuals</p>	<p>Evidence provided shows no additional occurrence of non-compliance were identified. Procedure was not updated, but evidence was supplied to show notifications were made to TPL, TOP, and RC; and revised Mitigation Plan added milestone 3 to address.</p> <p>Completed: 9/3/2016</p>	<ul style="list-style-type: none"> • Milestone Details.docx • PROTECTION SYSTEM MAINTENANCE PROGRAM.pdf (provided in MS 1 information) • 1_CLWU Guide to evidence.pdf • RC Transmission sensitive data - Lake Worth Under-frequency data.pdf • TOP Notification Transmission sensitive Data - City of Lake Worth Under-frequency data.pdf • TPL Underfrequency data FMPA.pdf

		to primary and secondary responsibilities for review and validation of the PRC-008 procedures and documentation		
9/9/16	3	<p>-Create/update procedure(s) to include: identifying changes in UFLS equipment; procedures to be updated for changes in UFLS equipment (i.e. PRC-006, PRC-008); processes/studies to be updated for changes in UFLS equipment (those for compliance with PRC and other Reliability Standards); notifications to be made for changes in UFLS equipment (PC, RC, TO/TOPs)</p> <p>-Assign individuals to primary and secondary responsibilities for review and validation of the PRC-008 procedures and documentation</p>	<p>Evidence provided shows procedure was updated to account for changes in UFLS, notifications, and secondary assignment of responsibilities.</p> <p>Completed: 9/4/2016</p>	<ul style="list-style-type: none"> • 1_CLWU Guide to evidence.pdf • 2_CLWU PRC-005-6 PSMP.pdf •

Data/Information Requests and Responses

<u>Question:</u>			
Due Date:		Response Received:	
Date Reviewed:			
<u>Review Comments:</u>			