

NERC Violation ID	Reliability Standard	Req.	Violation Risk Factor	Violation Severity Level	Violation Start Date	Violation End Date	Method of Discovery	Mitigation Completion Date	Date Regional Entity Verified Completion of Mitigation
FRCC2018019629	FAC-003-4	R3.3.1.	Lower	Moderate	10/01/2016	3/22/2018	Self-Report	6/1/2022 (approved completion date)	TBD
Description of the Violation (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 or confirmed violation.)			<p>On May 4, 2018, TAL submitted a Self-Report stating that, as a Generator Owner and Transmission Owner, it was in noncompliance with FAC-003-4 R3.1.</p> <p>During a review on December 7, 2017, TAL discovered that it could not reproduce the data supporting its maximum blowout conditions for applicable lines under FAC-003-4 R3.1. TAL was unable to replicate the maximum blowout calculations previously used to determine trim distances.</p> <p>The assumption data required to replicate the previous calculations made and used for compliance with this Standard has been lost, deleted, or was never originally documented. Only the summary results of the calculations were stored, and those results could not be replicated.</p> <p>This noncompliance started on October 1, 2016, when TAL’s documented maintenance procedures to prevent encroachment of vegetation into the Minimum Vegetation Clearance Distance (MVCD) of its applicable lines became effective and the specifications used to account for the movement of applicable line conductors under their Rating and all Rated Electrical Operations were not retained. The noncompliance ended on March 22, 2018, when TAL updated its documented maintenance procedures to reflect new trim calculations documenting the known system information and assumptions. TAL began performing increased trimming in 2018 based on the new trim calculations.</p> <p>The cause for this noncompliance was the TAL staff member originally chosen to be the subject matter expert for this component of the Standard did not have a clear understanding of the document retention requirements surrounding NERC compliance, and therefore, had not stored the assumptions used in the previous calculations in a location that was routinely backed up, nor had he completed any manual backups of the assumptions used.</p>						
Risk Assessment			<p>This noncompliance posed a moderate risk and did not pose a serious or substantial risk to the reliability of the bulk power system. The recalculation using known system information and other appropriate assumptions resulted in numbers with enough variance to affect trim distances in the field.</p> <p>The risk was moderate because TAL maintained its mowing, trimming, and visual inspection schedules appropriately in accordance with its vegetation management program. At no time during this period did any vegetation present a threat to a transmission line, nor were there any vegetation-related outages on any applicable lines.</p> <p>No harm is known to have occurred.</p>						
Mitigation			<p>To mitigate this violation, TAL:</p> <ul style="list-style-type: none">1) recalculated maximum blowout for all applicable lines using known, verified, and recorded assumptions;2) revised its Standard Operating Procedure (SOP) to reflect the new trim distances, which will be the baseline upon which annual trimming work plans will be based;3) re-assigned responsibility for the oversight, performance, and documentation of the engineering component of this compliance obligation;4) reinforced with applicable staff that corporate regulatory or operational information cannot be stored on an individual laptop or in any software application that is not accessible by one’s chain of command and that calculations must be thoroughly documented;5) stored assumptions and calculations performed across different applications including those routinely backed up to a server;6) implemented an internal control to require an annual internal determination of whether sufficient regulatory, environmental, or system conditions warrant a recalculation of maximum blowout calculations. This determination will be made annually by Power Delivery supervisory staff and the TAL compliance division;7) implemented a work plan. <p>To mitigate this violation, TAL will:</p> <ul style="list-style-type: none">1) perform clearing and maintenance work for applicable lines and report status of effort completed to the Region on a quarterly basis (6/1/2022).						
Other Factors			<p>The Region determined that the Entity’s compliance history should not serve as a basis for applying a penalty.</p> <p>FRCC considered the Entity’s ICP to be a neutral factor in the penalty determination.</p> <p>This noncompliance is being processed as a \$0 SNOP due to the extended duration of the mitigation.</p>						

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NPCC2018020344	EOP-004-2	R1	Lower	Severe	3/29/2017	11/1/2017	Self-Report	4/8/2019	4/11/2019
Description of the Violation (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, or confirmed violation.)			<p>On September 5, 2018, Greenidge Generation LLC (the Entity) submitted a Self-Report stating that, as a Generator Owner (GO) and Generator Operator (GOP), it was in violation of EOP-004-3 R1. Specifically, the Entity did not have an event report Operating Plan in place in accordance with EOP-004-3 Attachment 1. This violation began on March 29, 2017 and spans multiple versions of the Standard. NPCC applied the violation to EOP-004-2 which was the earliest applicable version of the Standard.</p> <p>The violation started on March 29, 2017, when the Entity first synchronized with the grid and was registered with NERC after recommissioning, and concluded on November 1, 2017, when the Entity developed an event reporting Operating Plan. The violation was discovered after the entity hired a third-party company to help them evaluate and implement a compliance program.</p> <p>The root cause of this violation was a lack of awareness of several NERC Reliability Standard requirement obligations as the plant was being recommissioned. In particular, the Entity did not incorporate amendments to the NERC Reliability Standards into its compliance program. Therefore, certain requirements were not reviewed, assessed, or implemented when the Entity recommissioned the Facility.</p>						
Risk Assessment			<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).</p> <p>The failure to have an Operating Plan in place could result in the failure to timely submit Reportable Events to the correct entities. However, as a GO and GOP with a nameplate capability of 112.5 MW, only two of the 18 Event Types are applicable to the entity: Damage or destruction of a Facility or Physical threats to a Facility. This requirement refers specifically to event reporting after an incident has occurred and the Entity's ability to recover from an event would not have been impacted. The Entity owns and operates a single steam turbine generator with nameplate capabilities of 112.5 MW which interconnect with the host Transmission Owner's BES substation via two 65 MVA generator step-up transformers. The rated capability of the generator is 5.7% of the Entity's Balancing Authority (NYISO) required Operating Reserve (1965 MW). In addition, the generator operated at capacity factors of 23.23% in 2017 and 20.82% in 2018. Therefore, even if an event occurred at the Facility and the notification was not provided, it is unlikely to have a negative impact on BPS reliability.</p> <p>No harm is known to have occurred as a result of this violation.</p>						
Mitigation			<p>To mitigate this violation, the Entity:</p> <p>1) developed an event reporting Operating Plan including protocols for reporting to the Reliability Organization and Reliability Coordinator and a training interval for all plant staff;</p> <p>2) developed a facility-specific procedure to ensure maintained compliance with EOP-004-3 R1;</p> <p>3) developed an ongoing contract with a third-party consulting firm to provide continual NERC compliance services and support. This includes quarterly meetings and monthly phone calls between the consultant and plant staff;</p> <p>4) provided training to all plant staff on the Operating Plan and other compliance responsibilities; and</p> <p>5) implemented Gensuite software to function as a compliance calendar to track periodic compliance activities.</p>						
Other Factors			<p>NPCC reviewed the entity’s internal compliance program (ICP) and considered it to be a neutral factor in the penalty determination.</p> <p>NPCC considered the entity’s compliance history and determined there were no relevant instances of noncompliance.</p> <p>Although the violation posed a minimal risk to the reliability of the bulk power system, NPCC determined that Compliance Exception treatment was not appropriate and that a sanction was appropriate based on the lack of due diligence and overall lack of NERC compliance awareness to ensure NERC Reliability Standard requirements were considered and implemented as the entity was recommissioning the facility.</p>						

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NPCC2018020343	EOP-004-2	R3	Medium	Severe	3/29/2017	11/1/2017	Self-Report	4/8/2019	4/11/2019
Description of the Violation (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, or confirmed violation.)			<p>On September 5, 2018, Greenidge Generation LLC (the Entity) submitted a Self-Report stating that, as a Generator Owner (GO) and Generator Operator (GOP), it was in violation with EOP-004-3 R3. Specifically, the Entity did not have an event report Operating Plan in accordance with EOP-004-3 Attachment 1, and therefore had not validated all contact information contained in the Operating Plan. This violation began on March 29, 2017 and spans multiple versions of the Standard. NPCC applied the violation to EOP-004-2 which was the earliest applicable version of the Standard.</p> <p>The violation started on March 29, 2017, when the Entity first synchronized with the grid and was registered with NERC after recommissioning, and concluded on November 1, 2017, when the Entity developed an event reporting Operating Plan and validated all contact information in the Plan. The violation was discovered after the entity hired a third-party company to help them evaluate and implement a compliance program.</p> <p>The root cause of this violation was a lack of awareness of several NERC Reliability Standard requirement obligations as the plant was being recommissioned. In particular, the Entity did not incorporate amendments to the NERC Reliability Standards into its compliance program. Therefore, certain requirements were not reviewed, assessed, or implemented when the Entity recommissioned the Facility.</p>						
Risk Assessment			<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).</p> <p>The failure to validate contact information contained in an Operating Plan in place could result in the failure to submit Reportable Events to the correct contacts. However, as a GO and GOP with a nameplate capability of 112.5 MW, only two of the 18 Event Types are applicable to the entity: Damage or destruction of a Facility or Physical threats to a Facility. This requirement refers specifically to event reporting after an incident has occurred, and the impact would have been reduced to limited information available to analyze an event on the BPS. The Entity's ability to recover from an event would not have been impacted. The Entity owns and operates a single steam turbine generator with nameplate capabilities of 112.5 MW and 132.4 MVA, which interconnect with the host Transmission Owner's BES substation via two 65 MVA generator step-up transformers. The rated capability of the generator is 5.7% of the Entity's Balancing Authority (NYISO) required Operating Reserve (1965 MW). In addition, the generator operated at capacity factors of 23.23% in 2017 and 20.82% in 2018. Therefore, the capacity of this unit can be replaced by the NYISO in the event of an unnecessary trip or loss of generating capability.</p> <p>No harm is known to have occurred as a result of this violation.</p>						
Mitigation			<p>To mitigate this violation, the Entity:</p> <p>1) developed an event reporting Operating Plan and validated all contact information in the Plan; 2) developed a facility-specific procedure to ensure maintained compliance with EOP-004-3; 3) developed an ongoing contract with a third party consulting firm to provide continual NERC compliance services and support This includes quarterly meetings and monthly phone calls between the consultant and plant staff; 4) provided training to relevant staff on validating all contact information; and 4) implemented Gensuite software to function as a compliance calendar to track periodic compliance activities.</p>						
Other Factors			<p>NPCC reviewed the entity’s internal compliance program (ICP) and considered it to be a neutral factor in the penalty determination.</p> <p>NPCC considered the entity’s compliance history and determined there were no relevant instances of noncompliance.</p> <p>Although the violation posed a minimal risk to the reliability of the bulk power system, NPCC determined that Compliance Exception treatment was not appropriate and that a sanction was appropriate based on the lack of due diligence and overall lack of NERC compliance awareness to ensure NERC Reliability Standard requirements were considered and implemented as the entity was recommissioning the facility.</p>						

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NPCC2018020342	FAC-008-3	R1	Lower	Severe	3/29/2017	11/1/2017	Self-Report	4/8/2019	4/11/2019
Description of the Violation (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, or confirmed violation.)			<p>On September 5, 2018, Greenidge Generation LLC (the Entity) submitted a Self-Report stating that, as a Generator Owner (GO), it was in violation with FAC-008-3 R1. Specifically, the Entity did not have a documented methodology for determining facility ratings for its generator equipment.</p> <p>The violation started on March 29, 2017, when the Entity first synchronized with the grid and was registered with NERC after recommissioning, and concluded on November 1, 2017, when the Entity developed and documented a facility rating methodology in accordance with FAC-008-3 R1. The violation was discovered after the entity hired a third-party company to help them evaluate and implement a compliance program.</p> <p>The root cause of this violation was a lack of awareness of several NERC Reliability Standard requirement obligations as the plant was being recommissioned. In particular, the Entity did not incorporate amendments to the NERC Reliability Standards into its compliance program. Therefore, certain requirements were not reviewed, assessed, or implemented when the Entity recommissioned the Facility.</p>						
Risk Assessment			<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).</p> <p>An entity with an undocumented facility ratings methodology could result in equipment damage and/or loss of equipment life. The Entity owns and operates a single steam turbine generator with nameplate capabilities of 112.5 MW and 132.4 MVA, which interconnect with the host Transmission Owner's BES substation via two 65 MVA generator step-up transformers. The rated capability of the generator is 5.7% of the Entity's Balancing Authority (NYISO) required Operating Reserve (1965 MW). In addition, the generator operated at capacity factors of 23.23% in 2017 and 20.82% in 2018. Therefore, the capacity of this unit can be replaced by the NYISO in the event of an unnecessary trip or loss of generating capability. There were no issues during the violation period due to exceeding equipment capabilities, and the Entity operated according to interconnection agreements with its interconnection Transmission Owner that identified the capabilities of the facility.</p> <p>No harm is known to have occurred as a result of this violation.</p>						
Mitigation			<p>To mitigate this violation, the Entity:</p> <p>1) developed a facility rating methodology in accordance with the requirements of FAC-008-3 R1 and documented facility ratings according to the methodology;</p> <p>2) developed a facility specific procedure to ensure maintained compliance with FAC-008-3 R1;</p> <p>3) developed an ongoing contract with a third party consulting firm to provide continual NERC compliance services and support This includes quarterly meetings and monthly phone calls between the consultant and plant staff;</p> <p>4) provided training to relevant staff on determining facility ratings; and</p> <p>5) implemented Gensuite software to function as a compliance calendar to track periodic compliance activities.</p>						
Other Factors			<p>NPCC reviewed the entity’s internal compliance program (ICP) and considered it to be a neutral factor in the penalty determination.</p> <p>NPCC considered the entity’s compliance history and determined there were no relevant instances of noncompliance.</p> <p>Although the violation posed a minimal risk to the reliability of the bulk power system, NPCC determined that Compliance Exception treatment was not appropriate and that a sanction was appropriate based on the lack of due diligence and overall lack of NERC compliance awareness to ensure NERC Reliability Standard requirements were considered and implemented as the entity was recommissioning the facility.</p>						

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NPCC2018020341	FAC-008-3	R2	Medium	Severe	3/29/2017	11/1/2017	Self-Report	4/8/2019	4/11/2019
Description of the Violation (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, or confirmed violation.)			<p>On September 5, 2018, Greenidge Generation LLC (the Entity) submitted a Self-Report stating that, as a Generator Owner (GO), it was in violation with FAC-008-3 R2. Specifically, the Entity did not have a documented methodology for determining facility ratings for its equipment to the point of interconnection with the Transmission Owner.</p> <p>The violation started on March 29, 2017, when the Entity first synchronized with the grid and was registered with NERC after recommissioning, and concluded on November 1, 2017, when the Entity developed and documented a facility rating methodology in accordance with FAC-008-3 R2. The violation was discovered after the entity hired a third-party company to help them evaluate and implement a compliance program.</p> <p>The root cause of this violation was a lack of awareness of several NERC Reliability Standard requirement obligations as the plant was being recommissioned. In particular, the Entity did not incorporate amendments to the NERC Reliability Standards into its compliance program. Therefore, certain requirements were not reviewed, assessed, or implemented when the Entity recommissioned the Facility.</p>						
Risk Assessment			<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).</p> <p>An entity with an undocumented facility ratings methodology could result in equipment damage and/or loss of equipment life. The Entity owns and operates a single steam turbine generator with nameplate capabilities of 112.5 MW and 132.4 MVA, which interconnect with the host Transmission Owner's BES substation via two 65 MVA generator step-up transformers. The rated capability of the generator is 5.7% of the Entity's Balancing Authority (NYISO) required Operating Reserve (1965 MW). In addition, the generator operated at capacity factors of 23.23% in 2017 and 20.82% in 2018. Therefore, the capacity of this unit can be replaced by the NYISO in the event of an unnecessary trip or loss of generating capability. There were no issues during the violation period due to exceeding equipment capabilities, and the Entity operated according to interconnection agreements with its interconnection Transmission Owner that identified the capabilities of the facility.</p> <p>No harm is known to have occurred as a result of this violation.</p>						
Mitigation			<p>To mitigate this violation, the Entity:</p> <p>1) developed a facility rating methodology in accordance with the requirements of FAC-008-3 R2;</p> <p>2) developed a facility specific procedure to ensure maintained compliance with FAC-008-3 R2;</p> <p>3) developed an ongoing contract with a third party consulting firm to provide continual NERC compliance services and support This includes quarterly meetings and monthly phone calls between the consultant and plant staff;</p> <p>4) provided training to relevant staff on determining facility ratings; and</p> <p>5) implemented Gensuite software to function as a compliance calendar to track periodic compliance activities.</p>						
Other Factors			<p>NPCC reviewed the entity’s internal compliance program (ICP) and considered it to be a neutral factor in the penalty determination.</p> <p>NPCC considered the entity’s compliance history and determined there were no relevant instances of noncompliance.</p> <p>Although the violation posed a minimal risk to the reliability of the bulk power system, NPCC determined that Compliance Exception treatment was not appropriate and that a sanction was appropriate based on the lack of due diligence and overall lack of NERC compliance awareness to ensure NERC Reliability Standard requirements were considered and implemented as the entity was recommissioning the facility.</p>						

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NPCC2018020340	PRC-019-2	R1	Medium	Lower	3/29/2017	6/25/2018	Self-Report	4/8/2019	4/11/2019
Description of the Violation (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, or confirmed violation.)			<p>On September 5, 2018, Greenidge Generation LLC (the Entity) submitted a Self-Report stating that, as a Generator Owner (GO), it was in violation with PRC-019-2 R1. Specifically the Entity did not have documentation that it coordinated voltage regulating controls with applicable Protection System devices.</p> <p>The violation started on March 29, 2017, when the Entity first synchronized with the grid and was registered with NERC after recommissioning, and concluded on June 25, 2018, when the final report for the coordination study was completed. The report indicated that there were not any coordination changes that were needed. The violation was discovered after the entity hired a third-party company to help them evaluate and implement a compliance program.</p> <p>The root cause of this violation was a lack of awareness of several NERC Reliability Standard requirement obligations as the plant was being recommissioned. In particular, the Entity did not incorporate amendments to the NERC Reliability Standards into its compliance program. Therefore, certain requirements were not reviewed, assessed, or implemented when the Entity recommissioned the Facility.</p>						
Risk Assessment			<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).</p> <p>The Entity's failure to coordinate the Protection System could cause an unnecessary trip, or failure to trip of the unit. The Entity owns and operates a single steam turbine generator with nameplate capabilities of 112.5 MW and 132.4 MVA, which interconnect with the host Transmission Owner's BES substation via two 65 MVA generator step-up transformers. The rated capability of the generator is 5.7% of the Entity's Balancing Authority (NYISO) required Operating Reserve (1965 MW). In addition, the generator operated at capacity factors of 23.23% in 2017 and 20.82% in 2018. Therefore, the capacity of this unit can be replaced by the NYISO in the event of an unnecessary trip or loss of generating capability. The completed coordination study found that the Entity was fully compliant with PRC-019 and that no changes needed to be made.</p> <p>No harm is known to have occurred as a result of this violation.</p>						
Mitigation			<p>To mitigate this violation, the Entity:</p> <p>1) contracted an engineering firm to perform the PRC-019-2 R1 coordination study and completed the study, determining no changes were necessary;</p> <p>2) developed a facility-specific procedure to ensure maintained compliance with PRC-019-2 R1;</p> <p>3) developed an ongoing contract with a third party consulting firm to provide continual NERC compliance services and support This includes quarterly meetings and monthly phone calls between the consultant and plant staff;</p> <p>4) provided training to relevant staff on coordinating voltage regulating controls; and</p> <p>5) implemented Gensuite software to function as a compliance calendar to track periodic compliance activities.</p>						
Other Factors			<p>NPCC reviewed the entity’s internal compliance program (ICP) and considered it to be a neutral factor in the penalty determination.</p> <p>NPCC considered the entity’s compliance history and determined there were no relevant instances of noncompliance.</p> <p>Although the violation posed a minimal risk to the reliability of the bulk power system, NPCC determined that Compliance Exception treatment was not appropriate and that a sanction was appropriate based on the lack of due diligence and overall lack of NERC compliance awareness to ensure NERC Reliability Standard requirements were considered and implemented as the entity was recommissioning the facility.</p>						

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NPCC2018020563	MOD-025-2	R1	Medium	Severe	4/1/2018	3/29/2019	Self-Report	4/8/2019	4/11/2019
Description of the Violation (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, or confirmed violation.)			<p>On October 22, 2018, Greenidge Generation LLC (the Entity) submitted a Self-Report stating that, as a Generator Owner (GO), it was in noncompliance with MOD-025-2 R1. Specifically, the Entity did not perform the necessary Real Power capability testing required by MOD-025-2 R1 at its plant within twelve calendar months of commercial operation, and therefore was unable to provide its Transmission Planner with verification of its Real Power capability. The plant became commercial on March 27, 2017.</p> <p>The noncompliance started on April 1, 2018, twelve calendar months after the Entity's commercial operation date, and concluded on March 29, 2019 when the Entity provided its Real Power capability test results to its Transmission Planner. The actual Real Power capability testing took place on June 6, 2018, but there was a delay in acquiring the test report from the electrical contractor.</p> <p>The root cause of this violation was a lack of awareness of several NERC Reliability Standard requirement obligations as the plant was being recommissioned. In particular, the Entity did not incorporate amendments to the NERC Reliability Standards into its compliance program. Therefore, certain requirements were not reviewed, assessed, or implemented when the Entity recommissioned the Facility.</p>						
Risk Assessment			<p>This noncompliance posed a minimal risk and did not pose a serious or substantial risk to the reliability of the bulk power system (BPS).</p> <p>The potential risk due to noncompliance with MOD-025-2 R1 is the Transmission Planner having inaccurate information about the generating units when developing planning models to assess BPS reliability. However, the entity synchronized the Facility on March 29, 2017 and the net active power output identified during commissioning testing was approximately equal to the 106 MWs, which is the same value provided by the June 6, 2018 power test. The Entity owns and operates a single steam turbine generator with nameplate capabilities of 112.5 MW and 132.4 MVA, which interconnect with the host Transmission Owner's BES substation via two 65 MVA generator step-up transformers. The rated capability of the generator is 5.7% of the Entity's Balancing Authority (NYISO) required Operating Reserve (1965 MW). In addition, the generator operated at capacity factors of 23.23% in 2017 and 20.82% in 2018. Therefore, the capacity of this unit can be replaced by the NYISO in the event of an unnecessary trip or loss of generating capability due to inaccurate information.</p> <p>No harm is known to have occurred as a result of this noncompliance.</p>						
Mitigation			<p>To mitigate this noncompliance, the Entity:</p> <p>1) contracted an engineering firm to perform Real Power capability testing and provided its Transmission Planner with the results;</p> <p>2) developed a facility specific procedure to ensure maintained compliance with MOD-025-2 R1;</p> <p>3) developed an ongoing contract with a third party consulting firm to provide continual NERC compliance services and support This includes quarterly meetings and monthly phone calls between the consultant and plant staff;</p> <p>4) provided training to relevant employees on real power capability testing; and</p> <p>5) implemented Gensuite software to function as a compliance calendar to track periodic compliance activities.</p>						
Other Factors			<p>NPCC reviewed the entity’s internal compliance program (ICP) and considered it to be a neutral factor in the penalty determination.</p> <p>NPCC considered the entity’s compliance history and determined there were no relevant instances of noncompliance.</p> <p>Although the violation posed a minimal risk to the reliability of the bulk power system, NPCC determined that Compliance Exception treatment was not appropriate and that a sanction was appropriate based on the lack of due diligence and overall lack of NERC compliance awareness to ensure NERC Reliability Standard requirements were considered and implemented as the entity was recommissioning the facility.</p>						

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NPCC2018020564	MOD-025-2	R2	Medium	Severe	4/1/2018	3/29/2019	Self-Report	4/8/2019	4/11/2019
Description of the Violation (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, or confirmed violation.)			<p>On October 22, 2018, Greenidge Generation LLC (the Entity) submitted a Self-Report stating that, as a Generator Owner (GO), it was in noncompliance with MOD-025-2 R2. Specifically, the Entity did not perform the necessary Reactive Power capability testing required by MOD-025-2 R2 at its plant within twelve calendar months of commercial operation, and therefore was unable to provide its Transmission Planner with verification of its Reactive Power capability. The plant became commercial on March 27, 2017.</p> <p>The noncompliance started on April 1, 2018, twelve calendar months after the Entity's commercial operation date, and concluded on March 29, 2019, when the Entity provided its Reactive Power capability test results to its Transmission Planner. The actual Reactive Power capability testing took place on June 6, 2018. There was a delay in acquiring the test report from the electrical contractor.</p> <p>The root cause of this violation was a lack of awareness of several NERC Reliability Standard requirement obligations as the plant was being recommissioned. In particular, the Entity did not incorporate amendments to the NERC Reliability Standards into its compliance program. Therefore, certain requirements were not reviewed, assessed, or implemented when the Entity recommissioned the Facility.</p>						
Risk Assessment			<p>This noncompliance posed a minimal risk and did not pose a serious or substantial risk to the reliability of the bulk power system (BPS).</p> <p>The potential risk due to noncompliance with MOD-025-2 R2 is the Transmission Planner having inaccurate information about the generating units when developing planning models to assess BPS reliability. The Entity owns and operates a single steam turbine generator with nameplate capabilities of 112.5 MW and 132.4 MVA, which interconnect with the host Transmission Owner's BES substation via two 65 MVA generator step-up transformers. The rated capability of the generator is 5.7% of the Entity's Balancing Authority (NYISO) required Operating Reserve (1965 MW). In addition, the generator operated at capacity factors of 23.23% in 2017 and 20.82% in 2018. Therefore, the capacity of this unit can be replaced by the NYISO in the event of an unnecessary trip or loss of generating capability due to inaccurate information.</p> <p>No harm is known to have occurred as a result of this noncompliance.</p>						
Mitigation			<p>To mitigate this noncompliance, the Entity:</p> <p>1) contracted an engineering firm to perform Reactive Power capability testing and provided its Transmission Planner with the results;</p> <p>2) developed a facility specific procedure to ensure maintained compliance with MOD-025-2;</p> <p>3) developed an ongoing contract with a third party consulting firm to provide continual NERC compliance services and support This includes quarterly meetings and monthly phone calls between the consultant and plant staff;</p> <p>4) provided training to relevant employees on reactive power capability testing; and</p> <p>5) implemented Gensuite software to function as a compliance calendar to track periodic compliance activities.</p>						
Other Factors			<p>NPCC reviewed the entity’s internal compliance program (ICP) and considered it to be a neutral factor in the penalty determination.</p> <p>NPCC considered the entity’s compliance history and determined there were no relevant instances of noncompliance.</p> <p>Although the violation posed a minimal risk to the reliability of the bulk power system, NPCC determined that Compliance Exception treatment was not appropriate and that a sanction was appropriate based on the lack of due diligence and overall lack of NERC compliance awareness to ensure NERC Reliability Standard requirements were considered and implemented as the entity was recommissioning the facility.</p>						