

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
RFC2018019840	COM-002-4	R3.	Lower	High	7/1/2016 (when the Standard became mandatory and enforceable on the entity)	3/1/2018 (when the entity provided the training to each of its operating personnel who can receive an oral two-party, person-to-person Operating Instruction)	Compliance Audit	3/1/2018	10/21/2019
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>During a Compliance Audit conducted from April 30, 2018 through May 8, 2018, ReliabilityFirst determined that the entity, as a Distribution Provider, was in violation of COM-002-4 R3.</p> <p>The entity did not conduct initial training for each of its operating personnel who can receive an oral two-party, person-to-person Operating Instruction prior to that individual operator receiving an oral two-party, person-to-person Operating Instruction. More specifically, the entity did not provide this training to three individuals until March 1, 2018 and the implementation date for COM-002-4 R3 was July 1, 2016. The three individuals had been receiving Operating Instructions prior to receiving the required training on March 1, 2018.</p> <p>During the Compliance Audit, the entity informed the Compliance Audit Team that all oral two-party, person-to-person Operating Instructions are provided with a FirstEnergy (FE) operator on-site who receives instructions from the FE Dispatcher. The FE operator then instructs the entity personnel to perform the operation on the entity equipment after the entity repeats the instruction and the FE operator confirms it. The FE Operator also has written switching orders that are used and followed at the direction of the FE Dispatcher. The entity misinterpreted the Standard and believed that its established communication process with FE negated the need for training of its own personnel.</p> <p>This violation involves the management practices of workforce management and grid operations. The entity did not understand that it needed to provide initial training to its operating personnel. That misunderstanding is a root cause of this violation as it led to the entity not performing the training for operating personnel.</p>						
Risk Assessment			<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). The risk posed by this violation is that lack of communication training to operating personnel can increase the chance of errors when receiving operating instructions and that could cause harm to the BPS. The risk is not minimal because of the extended almost two year duration. The risk is partially reduced because entity personnel only receive Operating Instructions in the presence of FE operators with written switching orders who ensured instructions were repeated and confirmed. Although entity personnel had not been formally trained on how to receive an oral two-party, person-to-person Operating Instruction, the entity indicated that personnel performed three-part communication in practice when receiving Operating Instructions, thereby reducing the risk. ReliabilityFirst also notes that the entity only has a peak load of 68 MW. No harm is known to have occurred.</p>						
Mitigation			<p>To mitigate this violation, the entity:</p> <ol style="list-style-type: none"> 1) trained the three individuals that can receive an oral two-party, person-to-person Operating Instruction; and 2) updated its procedure to ensure that all future personnel will get training on how to receive an oral two-party, person-to-person Operating Instruction before they are put into a position to receive an Operating Instruction. 						
Other Factors			<p>ReliabilityFirst reviewed the entity’s internal compliance program and considered it to be a neutral factor in the penalty determination.</p> <p>ReliabilityFirst considered the entity’s compliance history and determined there were no relevant instances of noncompliance. Given the long duration of both violations involved, and the method of discovery, ReliabilityFirst determined that sending a message via a Settlement Agreement instead of an FFT to incent compliance was an important step.</p>						

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
RFC2018019839	PRC-005-2(i)	R3	High	Severe	10/1/2015 (when the Standard became mandatory and enforceable on the entity)	7/13/2018	Compliance Audit	7/13/2018	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>During a Compliance Audit conducted from April 30, 2018 through May 8, 2018, ReliabilityFirst determined that the entity, as a Distribution Provider, was in violation of PRC-005-2(i) R3.</p> <p>The entity has one set of batteries and one charger that are subject to compliance with PRC-005-6. Although the entity performed quarterly tests (The entity inspected the batteries quarterly for the following: voltage of every cell in the battery, and specific gravity of any cell which has voltage outside the range of 2.12 and 2.27 volts.) and monthly tests (The entity inspected the batteries monthly for the following: float charge voltage at the battery terminal, float charge voltage at the charger, float current, electrolyte levels, pilot cell voltage, electrolyte temperature, evidence of cracks or leaking, and evidence of corrosion of terminals, rack or connectors.) on the protection system equipment, the entity did not perform all required testing. The entity did not perform the following four tests required by PRC-005-6 Table 1-4: (a) Unintentional ground test (must be conducted every four months); (b) Battery terminal connection resistance test (must be conducted every 18 months); (c) Battery intercell or unit to unit connections resistance test (must be conducted every 18 months); and (d) Load test (the entity could not provide evidence of the every 18 months load test or every six years load test).</p> <p>This violation involves the management practices of planning, work management, and grid operations. Planning and work management is involved because by misunderstanding PRC-005 the entity failed to properly schedule battery testing to comply with the standard. Grid operations is involved because a failure to properly test and maintain batteries endangered the entity's ability to function properly. The entity failed to update its Protection System Maintenance Program with the new tests required by PRC-005-6, Table 1-4. That failure to update arises from poor planning and is a root cause of this violation.</p>						
Risk Assessment			<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) The risk posed by this violation is that not completing all of the required maintenance and testing activities for the batteries and chargers creates the possibility that they will not function properly when needed, which could negatively affect the reliable operation of the BPS. The risk is not minimal because of the extended almost three-year duration. The risk is partially reduced because the entity was performing quarterly tests and monthly tests on the protection system equipment and that testing would likely indicate to the entity any battery degradation before failure occurred. ReliabilityFirst also notes that the entity only has a peak load of 68 MW. No harm is known to have occurred.</p>						
Mitigation			<p>To mitigate this violation, the entity:</p> <ol style="list-style-type: none"> 1) performed all of the overdue testing: unintentional ground test, battery terminal connection resistance test, battery intercell or unit to unit connections resistance test, and load test; and 2) updated its Protection System Maintenance Program with the new tests required by PRC-005-6, Table 1-4 to prevent recurrence. 						
Other Factors			<p>ReliabilityFirst reviewed the entity's internal compliance program and considered it to be a neutral factor in the penalty determination.</p> <p>ReliabilityFirst considered the entity's compliance history and determined there were no relevant instances of noncompliance.</p>						

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
WECC2017017579	TOP-002-2.1b	R1	Medium	High	11/30/2016 (when the work permit was issued)	11/30/2016 (when the work permit was released)	Self-Report	4/1/2017	1/25/2018
<p>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>			<p>On May 18, 2017, BPA submitted a Self-Report stating, as a Transmission Operator (TOP), it had a potential noncompliance with TOP-002-2.1b R1.</p> <p>On November 30, 2016, BPA was implementing an outage as a part of the boundary Remedial Action Scheme (RAS), which entailed line loss logic for three separate lines. BPA did not correctly implement the published Study Limit Information Memo (SLIM), as is required by BPA’s Operating Plan during the outage. The SLIM for this outage condition specified that a 650 MW System Operating Limit (SOL) should be set at the one boundary’s flowgate. The Dispatcher, however, implemented a restricted generation limit of 650 MW at the boundary generation station. BPA did not lower the boundary SOL from 1300 MW to 650 MW. This mistake resulted in BPA operating a boundary SOL that was 650 MW higher than the setting should have been. As a result, the boundary RAS was operated in a degraded state. In addition, BPA had not included the boundary RAS in the list of Special Protection Systems that were incorporated into the Coordinated Outage System and therefore not reported to BPA’s RC.</p> <p>The outage work that resulted in the boundary RAS is usually completed one line at a time. When the SLIM was issued in this case, the Dispatcher also reviewed a Dispatch Standing Order (DSO) but the guidance was not applicable. This misunderstanding between the SLIM and DSO resulted in BPA not manually entering the SOL into the control system. Because the lower SOL was not entered in the control system, the alarm monitoring did not alert to three SOL exceedances between 2:15 PM and 2:45 PM on November 30, 2016. Due to the lack of alarms, the Dispatcher did not realize there were SOL exceedances.</p> <p>The root cause of the violations associated with TOP-002-2.1b R1, TOP-002-2.1b R4, TOP-004-2 R1, TOP-007-0 R1, and IRO-010-1a R3 was attributed to the confusion of the Dispatcher as to which operating instructions he should follow during an outage--between the SLIM and the DSO. For the violation associated with IRO-005-3.1a R9, the root cause was attributed to BPA’s violation of TOP-002-2.1b R1. As a result, BPA:</p> <ul style="list-style-type: none"> a. did not correctly implement its Operating Plan using the SLIM, as required by TOP-002-2.1b R1; b. did not provide its neighboring RC and TOPs with the correct SOL because it had been operating with the incorrect calculation, as required by TOP-002-2.1b R4; c. did not operate within the SOLs during this outage, as required by TOP-004-2 R1; d. did not inform its RC that the RAS was operated in a degraded state, as required by IRO-005-3.1a R9; e. did not provide its RC with the following, as specified in its RC Data Specification: <ul style="list-style-type: none"> i. the correct boundary SOL; ii. the notifications of SOL exceedance and actions taken because BPA did not know the correct flow over the boundary path, nor did BPA report on the actions it should have taken to correct the problems; iii. boundary RAS being operated in a degraded state, as required by IRO-010-1a R3; and f. did not notify its RC of the SOL exceedances nor its actions to resolve them due to the lack of alarms that would have alerted BPA that there was an SOL exceedance, as required by TOP-007-0 R1. <p>These violations began on November 30, 2016 at 8:30 AM, when the work permit was issued, and ended on November 30, 2016 at 3:59 PM, when the work permit was released for a total of one day of noncompliance with each these Standards and Requirements.</p>						
<p>Risk Assessment</p>			<p>WECC determined these violations in aggregate posed a moderate risk and did not pose a serious and substantial risk to the reliability of the BPS. In these instances, BPA failed to:</p> <ul style="list-style-type: none"> a. maintain a set of current plans that are designed to evaluate options and set procedures for reliable operation through a reasonable future time period. In addition, each BA and Transmission Operator shall be responsible for using available personnel and system equipment to implement these plans to ensure that interconnected system reliability will be maintained, as required by TOP-002-2.1b R1; b. coordinate (where confidentiality agreements allow) its current-day, next-day, and seasonal planning and operations with neighboring Balancing Authorities and Transmission Operators and with its Reliability Coordinator, so that normal Interconnection operation will proceed in an orderly and consistent manner, as required by TOP-002-2.1b R4; c. have an Operational Planning Analysis that will allow it to assess whether its planned operations for the next day within its TOP Area will exceed any of its SOLs, as required by TOP-002-4 R1; d. inform its Reliability Coordinator when an IROL or SOL has been exceeded and the actions being taken to return the system to within limits, as required by TOP-007-0 R1; e. inform the Reliability Coordinator of the status of the Special Protection System including any degradation or potential failure to operate as expected, whenever a Special Protection System that may have an inter-BA, or inter-Transmission Operator impact (e.g., could potentially affect transmission flows resulting in a SOL or IROL violation) is armed, the Reliability Coordinators shall be aware of the impact of the operation of that Special Protection System on inter-area flows, as required by IRO-005-3.1a R9; and f. provide data and information, as specified, to the Reliability Coordinator(s) with which it has a reliability relationship, as required by IRO-010-1a R3. 						

	<p>In this case, BPA was already operating its system with the RAS in a degraded state. If BPA were to have lost another line, the RAS could have caused a loss of load and potentially opened the remaining lines entirely. Further, BPA implemented weak preventative controls. However, BPA implemented effective controls, this issue was discovered during a routine monitoring activity nine days after the issue occurred, on December 9, 2016. As compensation, instead of setting the correct SOL, BPA instructed the main generation station for these lines to limit its generation to 650 MW. This action by BPA reduced the risk because instead of changing the SOL to address its mistake, it instructed the main generation station to limit its generation which then lowered the flows on the path without changing the SOL.</p>
Mitigation	<p>To mitigate this violation, BPA:</p> <ol style="list-style-type: none"> 1) BPA's Dispatch Manager sent a 10-point message to all dispatchers and its RC specifying the proper implementation of a SLIM for the boundary including the boundary RAS that was related to the lack of Protection System documentation; and 2) as of April 1, 2017, with new versions of the Standards, TOPs were no longer required to notify the RC of SOLs on internal paths nor status changes in RAS Schemes. As well, the Dispatchers were trained on a new use of SLIMs as part of the transition efforts to the new TOP and IRO Standards including how to implement them and what to communicate to the RC and other entities. The additional guidance provided through this training was specifically designed to avoid misunderstandings of when to follow guidance in a SLIM, rather than that provided in a DSO.
Other Factors	<p>WECC reviewed BPA's internal compliance program (ICP) and considered it to be a neutral factor.</p> <p>On August 22, 2014, in Southwestern Power Administration (SWPA) v. Federal Energy Regulatory Commission (FERC), the United States Court of Appeals for the District of Columbia Circuit unanimously ruled that FERC, and by extension, the North American Electric Reliability Corporation (NERC) and the Regional Entities it oversees, such as WECC, could not impose monetary penalties against federal governmental entities such as SWPA. BPA is a federal governmental entity, and WECC is bound to follow SWPA v. FERC in the resolution of this matter. Therefore, WECC has assessed no monetary penalty for this violation.</p> <p>WECC considered BPA's TOP-002-2.1b R1 compliance history to be an aggravating factor in determining the disposition track, specifically NERC Violation ID WECC2015015074.</p>

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
WECC2017017591	TOP-002-2.1b	R4	Medium	Moderate	11/30/2016 (when the work permit was issued)	11/30/2016 (when the work permit was released)	Self-Report	4/1/2017	12/27/2017
<p>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>			<p>On May 18, 2017, BPA submitted a Self-Report stating, as a Transmission Operator (TOP), it had a potential noncompliance with TOP-002-2.1b R4.</p> <p>On November 30, 2016, BPA was implementing an outage as a part of the boundary Remedial Action Scheme (RAS), which entailed line loss logic for three separate lines. BPA did not correctly implement the published Study Limit Information Memo (SLIM), as is required by BPA’s Operating Plan during the outage. The SLIM for this outage condition specified that a 650 MW System Operating Limit (SOL) should be set at the one boundary’s flowgate. The Dispatcher, however, implemented a restricted generation limit of 650 MW at the boundary generation station. BPA did not lower the boundary SOL from 1300 MW to 650 MW. This mistake resulted in BPA operating a boundary SOL that was 650 MW higher than the setting should have been. As a result, the boundary RAS was operated in a degraded state. In addition, BPA had not included the boundary RAS in the list of Special Protection Systems that were incorporated into the Coordinated Outage System and therefore not reported to BPA’s RC.</p> <p>The outage work that resulted in the boundary RAS is usually completed one line at a time. When the SLIM was issued in this case, the Dispatcher also reviewed a Dispatch Standing Order (DSO) but the guidance was not applicable. This misunderstanding between the SLIM and DSO resulted in BPA not manually entering the SOL into the control system. Because the lower SOL was not entered in the control system, the alarm monitoring did not alert to three SOL exceedances between 2:15 PM and 2:45 PM on November 30, 2016. Due to the lack of alarms, the Dispatcher did not realize there were SOL exceedances.</p> <p>The root cause of the violations associated with TOP-002-2.1b R1, TOP-002-2.1b R4, TOP-004-2 R1, TOP-007-0 R1 and IRO-010-1a R3 was attributed to the confusion of the Dispatcher as to which operating instructions he should follow during an outage--between the SLIM and the DSO. For the violation associated with IRO-005-3.1a R9, the root cause was attributed to BPA’s violation of TOP-002-2.1b R1. As a result, BPA:</p> <ul style="list-style-type: none"> a. did not correctly implement its Operating Plan using the SLIM, as required by TOP-002-2.1b R1; b. did not provide its neighboring RC and TOPs with the correct SOL because it had been operating with the incorrect calculation, as required by TOP-002-2.1b R4; c. did not operate within the SOLs during this outage, as required by TOP-004-2 R1; d. did not inform its RC that the RAS was operated in a degraded state, as required by IRO-005-3.1a R9; e. did not provide its RC with the following, as specified in its RC Data Specification: <ul style="list-style-type: none"> i. the correct boundary SOL; ii. the notifications of SOL exceedance and actions taken because BPA did not know the correct flow over the boundary path, nor did BPA report on the actions it should have taken to correct the problems; iii. boundary RAS being operated in a degraded state, as required by IRO-010-1a R3; and f. did not notify its RC of the SOL exceedances nor its actions to resolve them due to the lack of alarms that would have alerted BPA that there was an SOL exceedance, as required by TOP-007-0 R1. <p>These violations began on November 30, 2016 at 8:30 AM, when the work permit was issued, and ended on November 30, 2016 at 3:59 PM, when the work permit was released for a total of one day of noncompliance of each these Standards and Requirements.</p>						
<p>Risk Assessment</p>			<p>WECC determined that these violations in aggregate posed a moderate risk and did not pose a serious and substantial risk to the reliability of the BPS. In these instances, BPA failed to:</p> <ul style="list-style-type: none"> a. maintain a set of current plans that are designed to evaluate options and set procedures for reliable operation through a reasonable future time period. In addition, each BA and TOP shall be responsible for using available personnel and system equipment to implement these plans to ensure that interconnected system reliability will be maintained, as required by TOP-002-2.1b R1; b. coordinate (where confidentiality agreements allow) its current-day, next-day, and seasonal planning and operations with neighboring Balancing Authorities and TOPs and with its Reliability Coordinator, so that normal Interconnection operation will proceed in an orderly and consistent manner, as required by TOP-002-2.1b R4; c. have an Operational Planning Analysis that will allow it to assess whether its planned operations for the next day within its TOP Area will exceed any of its SOLs, as required by TOP-002-4 R1; d. inform its Reliability Coordinator when an IROL or SOL has been exceeded and the actions being taken to return the system to within limits, as required by TOP-007-0 R1; e. inform the Reliability Coordinator of the status of the Special Protection System including any degradation or potential failure to operate as expected, whenever a Special Protection System that may have an inter-BA, or inter-TOP impact (e.g., could potentially affect transmission flows resulting in a SOL or IROL violation) is armed, the Reliability Coordinators shall be aware of the impact of the operation of that Special Protection System on inter-area flows, as required by IRO-005-3.1a R9; and 						

	<p>f. provide data and information, as specified, to the Reliability Coordinator(s) with which it has a reliability relationship, as required by IRO-010-1a R3.</p> <p>In this case, BPA was already operating its system with the RAS in a degraded state. If BPA were to have lost another line, the RAS could have caused a loss of load and potentially opened the remaining lines entirely. Further, BPA implemented weak preventative controls. However, BPA implemented effective controls, this issue was discovered during a routine monitoring activity nine days after the issue occurred, on December 9, 2016. As compensation, instead of setting the correct SOL, BPA instructed the main generation station for these lines to limit its generation to 650 MW. This action by BPA reduced the risk because instead of changing the SOL to address its mistake, it instructed the main generation station to limit its generation which then lowered the flows on the path without changing the SOL.</p>
Mitigation	<p>To mitigate this violation, BPA:</p> <ol style="list-style-type: none"> 1) BPA's Dispatch Manager sent a 10-point message to all dispatchers and its RC specifying the proper implementation of a SLIM for the boundary including the boundary RAS that was related to the lack of Protection System documentation; and 2) as of April 1, 2017, with new versions of the Standards, TOPs were no longer required to notify the RC of SOLs on internal paths nor status changes in RAS Schemes. As well, the Dispatchers were trained on a new use of SLIMs as part of the transition efforts to the new TOP and IRO Standards including how to implement them and what to communicate to the RC and other entities. The additional guidance provided through this training was specifically designed to avoid misunderstandings of when to follow guidance in a SLIM, rather than that provided in a DSO.
Other Factors	<p>WECC reviewed BPA's internal compliance program (ICP) and considered it to be a neutral factor.</p> <p>On August 22, 2014, in <i>Southwestern Power Administration (SWPA) v. Federal Energy Regulatory Commission (FERC)</i>, the United States Court of Appeals for the District of Columbia Circuit unanimously ruled that FERC, and by extension, the North American Electric Reliability Corporation (NERC) and the Regional Entities it oversees, such as WECC, could not impose monetary penalties against federal governmental entities such as SWPA. BPA is a federal governmental entity, and WECC is bound to follow <i>SWPA v. FERC</i> in the resolution of this matter. Therefore, WECC has assessed no monetary penalty for this violation.</p> <p>WECC considered BPA's TOP-002-.1b R4 compliance history to be an aggravating factor in determining the disposition track specifically, NERC Violation IDs WECC2012009943, WECC2012011098 and WECC2016015703.</p>

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
WECC2017017588	TOP-004-2	R1	Medium	Severe	11/30/2016 (when the work permit was issued)	11/30/2016 (when the work permit was released)	Self-Report	4/1/2017	12/27/2017
<p>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>			<p>On May 18, 2017, BPA submitted a Self-Report stating, as a Transmission Operator (TOP), it had a potential noncompliance with TOP-004-2 R1.</p> <p>On November 30, 2016, BPA was implementing an outage as a part of the boundary Remedial Action Scheme (RAS), which entailed line loss logic for three separate lines. BPA did not correctly implement the published Study Limit Information Memo (SLIM), as is required by BPA’s Operating Plan during the outage. The SLIM for this outage condition specified that a 650 MW System Operating Limit (SOL) should be set at the one boundary’s flowgate. The Dispatcher, however, implemented a restricted generation limit of 650 MW at the boundary generation station. BPA did not lower the boundary SOL from 1300 MW to 650 MW. This mistake resulted in BPA operating a boundary SOL that was 650 MW higher than the setting should have been. As a result, the boundary RAS was operated in a degraded state. In addition, BPA had not included the boundary RAS in the list of Special Protection Systems that were incorporated into the Coordinated Outage System and therefore not reported to BPA’s RC.</p> <p>The outage work that resulted in the boundary RAS is usually completed one line at a time. When the SLIM was issued in this case, the Dispatcher also reviewed a Dispatch Standing Order (DSO) but the guidance was not applicable. This misunderstanding between the SLIM and DSO resulted in BPA not manually entering the SOL into the control system. Because the lower SOL was not entered in the control system, the alarm monitoring did not alert to three SOL exceedances between 2:15 PM and 2:45 PM on November 30, 2016. Due to the lack of alarms, the Dispatcher did not realize there were SOL exceedances.</p> <p>The root cause of the violations associated with TOP-002-2.1b R1, TOP-002-2.1b R4, TOP-004-2 R1, TOP-007-0 R1 and IRO-010-1a R3 was attributed to the confusion of the Dispatcher as to which operating instructions he should follow during an outage--between the SLIM and the DSO. For the violation associated with IRO-005-3.1a R9, the root cause was attributed to BPA’s violation of TOP-002-2.1b R1. As a result, BPA:</p> <ul style="list-style-type: none"> a. did not correctly implement its Operating Plan using the SLIM, as required by TOP-002-2.1b R1; b. did not provide its neighboring RC and TOPs with the correct SOL because it had been operating with the incorrect calculation, as required by TOP-002-2.1b R4; c. did not operate within the SOLs during this outage, as required by TOP-004-2 R1; d. did not inform its RC that the RAS was operated in a degraded state, as required by IRO-005-3.1a R9; e. did not provide its RC with the following, as specified in its RC Data Specification: <ul style="list-style-type: none"> i. the correct boundary SOL; ii. the notifications of SOL exceedance and actions taken because BPA did not know the correct flow over the boundary path, nor did BPA report on the actions it should have taken to correct the problems; iii. boundary RAS being operated in a degraded state, as required by IRO-010-1a R3; and f. did not notify its RC of the SOL exceedances nor its actions to resolve them due to the lack of alarms that would have alerted BPA that there was an SOL exceedance, as required by TOP-007-0 R1. <p>These violations began on November 30, 2016 at 8:30 AM, when the work permit was issued, and ended on November 30, 2016 at 3:59 PM, when the work permit was released for a total of one day of noncompliance of each these Standards and Requirements.</p>						
<p>Risk Assessment</p>			<p>WECC determined that these violations in aggregate posed a moderate risk and did not pose a serious and substantial risk to the reliability of the BPS. In these instances, BPA failed to:</p> <ul style="list-style-type: none"> a. maintain a set of current plans that are designed to evaluate options and set procedures for reliable operation through a reasonable future time period. In addition, each BA and TOP shall be responsible for using available personnel and system equipment to implement these plans to ensure that interconnected system reliability will be maintained, as required by TOP-002-2.1b R1; b. coordinate (where confidentiality agreements allow) its current-day, next-day, and seasonal planning and operations with neighboring Balancing Authorities and TOPs and with its Reliability Coordinator, so that normal Interconnection operation will proceed in an orderly and consistent manner, as required by TOP-002-2.1b R4; c. have an Operational Planning Analysis that will allow it to assess whether its planned operations for the next day within its TOP Area will exceed any of its SOLs, as required by TOP-002-4 R1; d. inform its Reliability Coordinator when an IROL or SOL has been exceeded and the actions being taken to return the system to within limits, as required by TOP-007-0 R1; e. inform the Reliability Coordinator of the status of the Special Protection System including any degradation or potential failure to operate as expected, whenever a Special Protection System that may have an inter-BA, or inter-TOP impact (e.g., could potentially affect transmission flows resulting in a SOL or IROL violation) is armed, the Reliability Coordinators shall be aware of the impact of the operation of that Special Protection System on inter-area flows, as required by IRO-005-3.1a R9; and f. provide data and information, as specified, to the Reliability Coordinator(s) with which it has a reliability relationship, as required by IRO-010-1a R3. 						

	<p>In this case, BPA was already operating its system with the RAS in a degraded state. If BPA were to have lost another line, the RAS could have caused a loss of load and potentially opened the remaining lines entirely. Further, BPA implemented weak preventative controls. However, BPA implemented effective controls, this issue was discovered during a routine monitoring activity nine days after the issue occurred, on December 9, 2016. As compensation, instead of setting the correct SOL, BPA instructed the main generation station for these lines to limit its generation to 650 MW. This action by BPA reduced the risk because instead of changing the SOL to address its mistake, it instructed the main generation station to limit its generation which then lowered the flows on the path without changing the SOL.</p>
Mitigation	<p>To mitigate this violation, BPA:</p> <ol style="list-style-type: none"> 1) BPA's Dispatch Manager sent a 10-point message to all dispatchers and its RC specifying the proper implementation of a SLIM for the boundary including the boundary RAS that was related to the lack of Protection System documentation; and 2) as of April 1, 2017, with new versions of the Standards, TOPs were no longer required to notify the RC of SOLs on internal paths nor status changes in RAS Schemes. As well, the Dispatchers were trained on a new use of SLIMs as part of the transition efforts to the new TOP and IRO Standards including how to implement them and what to communicate to the RC and other entities. The additional guidance provided through this training was specifically designed to avoid misunderstandings of when to follow guidance in a SLIM, rather than that provided in a DSO.
Other Factors	<p>WECC reviewed BPA's internal compliance program (ICP) and considered it to be a neutral factor.</p> <p>On August 22, 2014, in <i>Southwestern Power Administration (SWPA) v. Federal Energy Regulatory Commission (FERC)</i>, the United States Court of Appeals for the District of Columbia Circuit unanimously ruled that FERC, and by extension, the North American Electric Reliability Corporation (NERC) and the Regional Entities it oversees, such as WECC, could not impose monetary penalties against federal governmental entities such as SWPA. BPA is a federal governmental entity, and WECC is bound to follow <i>SWPA v. FERC</i> in the resolution of this matter. Therefore, WECC has assessed no monetary penalty for this violation.</p> <p>WECC considered BPA's TOP-004-2 R1 compliance history to be an aggravating factor in determining the disposition track specifically, NERC Violation IDs WECC2012009942 and WECC2015015075.</p>

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
WECC2017017589	TOP-007-0	R1	High	Severe	11/30/2016 (when the work permit was issued)	11/30/2016 (when the work permit was released)	Self-Report	4/1/2017	12/21/2017
<p>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>			<p>On May 18, 2017, BPA submitted a Self-Report stating, as a Transmission Operator (TOP), it had a potential noncompliance with TOP-007-0 R1.</p> <p>On November 30, 2016, BPA was implementing an outage as a part of the boundary Remedial Action Scheme (RAS), which entailed line loss logic for three separate lines. BPA did not correctly implement the published Study Limit Information Memo (SLIM), as is required by BPA’s Operating Plan during the outage. The SLIM for this outage condition specified that a 650 MW System Operating Limit (SOL) should be set at the one boundary’s flowgate. The Dispatcher, however, implemented a restricted generation limit of 650 MW at the boundary generation station. BPA did not lower the boundary SOL from 1300 MW to 650 MW. This mistake resulted in BPA operating a boundary SOL that was 650 MW higher than the setting should have been. As a result, the boundary RAS was operated in a degraded state. In addition, BPA had not included the boundary RAS in the list of Special Protection Systems that were incorporated into the Coordinated Outage System and therefore not reported to BPA’s RC.</p> <p>The outage work that resulted in the boundary RAS is usually completed one line at a time. When the SLIM was issued in this case, the Dispatcher also reviewed a Dispatch Standing Order (DSO) but the guidance was not applicable. This misunderstanding between the SLIM and DSO resulted in BPA not manually entering the SOL into the control system. Because the lower SOL was not entered in the control system, the alarm monitoring did not alert to three SOL exceedances between 2:15 PM and 2:45 PM on November 30, 2016. Due to the lack of alarms, the Dispatcher did not realize there were SOL exceedances.</p> <p>The root cause of the violations associated with TOP-002-2.1b R1, TOP-002-2.1b R4, TOP-004-2 R1, TOP-007-0 R1 and IRO-010-1a R3 was attributed to the confusion of the Dispatcher as to which operating instructions he should follow during an outage--between the SLIM and the DSO. For the violation associated with IRO-005-3.1a R9, the root cause was attributed to BPA’s violation of TOP-002-2.1b R1. As a result, BPA:</p> <ol style="list-style-type: none"> a. did not correctly implement its Operating Plan using the SLIM, as required by TOP-002-2.1b R1; b. did not provide its neighboring RC and TOPs with the correct SOL because it had been operating with the incorrect calculation, as required by TOP-002-2.1b R4; c. did not operate within the SOLs during this outage, as required by TOP-004-2 R1; d. did not inform its RC that the RAS was operated in a degraded state, as required by IRO-005-3.1a R9; e. did not provide its RC with the following, as specified in its RC Data Specification: <ol style="list-style-type: none"> i. the correct boundary SOL; ii. the notifications of SOL exceedance and actions taken because BPA did not know the correct flow over the boundary path, nor did BPA report on the actions it should have taken to correct the problems; iii. boundary RAS being operated in a degraded state, as required by IRO-010-1a R3; and f. did not notify its RC of the SOL exceedances nor its actions to resolve them due to the lack of alarms that would have alerted BPA that there was an SOL exceedance, as required by TOP-007-0 R1. <p>These violations began on November 30, 2016 at 8:30 AM, when the work permit was issued, and ended on November 30, 2016 at 3:59 PM, when the work permit was released for a total of one day of noncompliance of each these Standards and Requirements.</p>						
<p>Risk Assessment</p>			<p>WECC determined that these violations in aggregate posed a moderate risk and did not pose a serious and substantial risk to the reliability of the BPS. In these instances, BPA failed to:</p> <ol style="list-style-type: none"> a. maintain a set of current plans that are designed to evaluate options and set procedures for reliable operation through a reasonable future time period. In addition, each BA and TOP shall be responsible for using available personnel and system equipment to implement these plans to ensure that interconnected system reliability will be maintained, as required by TOP-002-2.1b R1; b. coordinate (where confidentiality agreements allow) its current-day, next-day, and seasonal planning and operations with neighboring Balancing Authorities and TOPs and with its Reliability Coordinator, so that normal Interconnection operation will proceed in an orderly and consistent manner, as required by TOP-002-2.1b R4; c. have an Operational Planning Analysis that will allow it to assess whether its planned operations for the next day within its TOP Area will exceed any of its SOLs, as required by TOP-002-4 R1; d. inform its Reliability Coordinator when an IROL or SOL has been exceeded and the actions being taken to return the system to within limits, as required by TOP-007-0 R1; e. inform the Reliability Coordinator of the status of the Special Protection System including any degradation or potential failure to operate as expected, whenever a Special Protection System that may have an inter-BA, or inter-TOP impact (e.g., could potentially affect transmission flows resulting in a SOL or IROL violation) is armed, the Reliability Coordinators shall be aware of the impact of the operation of that Special Protection System on inter-area flows, as required by IRO-005-3.1a R9; and f. provide data and information, as specified, to the Reliability Coordinator(s) with which it has a reliability relationship, as required by IRO-010-1a R3. <p>In this case, BPA was already operating its system with the RAS in a degraded state. If BPA were to have lost another line, the RAS could have caused a loss of load and potentially opened the remaining lines entirely. Further, BPA implemented weak preventative or detective controls. However, as compensation, instead of setting the correct SOL, BPA instructed the main generation station for these lines</p>						

	limit its generation to 650 MW. This action by BPA reduced the risk because instead of changing the SOL to address its mistake, it instructed the main generation station to limit its generation which then lowered the flows on the path without changing the SOL.
Mitigation	<p>To mitigate this violation, BPA:</p> <ul style="list-style-type: none"> 1) BPA’s Dispatch Manager sent a 10-point message to all dispatchers and its RC specifying the proper implementation of a SLIM for the boundary including the boundary RAS that was related to the lack of Protection System documentation; and 1) as of April 1, 2017, with new versions of the Standards, TOPs were no longer required to notify the RC of SOLs on internal paths nor status changes in RAS Schemes. As well, the Dispatchers were trained on a new use of SLIMs as part of the transition efforts to the new TOP and IRO Standards including how to implement them and what to communicate to the RC and other entities. The additional guidance provided through this training was specifically designed to avoid misunderstandings of when to follow guidance in a SLIM, rather than that provided in a DSO.
Other Factors	<p>WECC reviewed BPA’s internal compliance program (ICP) and considered it to be a neutral factor. On August 22, 2014, in Southwestern Power Administration (SWPA) v. Federal Energy Regulatory Commission (FERC), the United States Court of Appeals for the District of Columbia Circuit unanimously ruled that FERC, and by extension, the North American Electric Reliability Corporation (NERC) and the Regional Entities it oversees, such as WECC, could not impose monetary penalties against federal governmental entities such as SWPA. BPA is a federal governmental entity, and WECC is bound to follow SWPA v. FERC in the resolution of this matter. Therefore, WECC has assessed no monetary penalty for this violation.</p> <p>WECC considered BPA’s TOP-007-0 R1 compliance history to be an aggravating factor in determining the disposition track specifically, NERC Violation ID WECC2012009941.</p>

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
WECC2017017584	IRO-005-3.1a	R9	Lower	Severe	11/30/2016 (when the work permit was issued)	11/30/2016 (when the work permit was released)	Self-Report	4/1/2017	12/14/2017
<p>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>			<p>On May 18, 2017, BPA submitted a Self-Report stating, as a Transmission Operator (TOP), it had a potential noncompliance with IRO-005-3.1a R9.</p> <p>On November 30, 2016, BPA was implementing an outage as a part of the boundary Remedial Action Scheme (RAS), which entailed line loss logic for three separate lines. BPA did not correctly implement the published Study Limit Information Memo (SLIM), as is required by BPA’s Operating Plan during the outage. The SLIM for this outage condition specified that a 650 MW System Operating Limit (SOL) should be set at the one boundary’s flowgate. The Dispatcher, however, implemented a restricted generation limit of 650 MW at the boundary generation station. BPA did not lower the boundary SOL from 1300 MW to 650 MW. This mistake resulted in BPA operating a boundary SOL that was 650 MW higher than the setting should have been. As a result, the boundary RAS was operated in a degraded state. In addition, BPA had not included the boundary RAS in the list of Special Protection Systems that were incorporated into the Coordinated Outage System and therefore not reported to BPA’s RC.</p> <p>The outage work that resulted in the boundary RAS is usually completed one line at a time. When the SLIM was issued in this case, the Dispatcher also reviewed a Dispatch Standing Order (DSO) but the guidance was not applicable. This misunderstanding between the SLIM and DSO resulted in BPA not manually entering the SOL into the control system. Because the lower SOL was not entered in the control system, the alarm monitoring did not alert to three SOL exceedances between 2:15 PM and 2:45 PM on November 30, 2016. Due to the lack of alarms, the Dispatcher did not realize there were SOL exceedances.</p> <p>The root cause of the violations associated with TOP-002-2.1b R1, TOP-002-2.1b R4, TOP-004-2 R1, TOP-007-0 R1 and IRO-010-1a R3 was attributed to the confusion of the Dispatcher as to which operating instructions he should follow during an outage--between the SLIM and the DSO. For the violation associated with IRO-005-3.1a R9, the root cause was attributed to BPA’s violation of TOP-002-2.1b R1. As a result, BPA:</p> <ul style="list-style-type: none"> a. did not correctly implement its Operating Plan using the SLIM, as required by TOP-002-2.1b R1; b. did not provide its neighboring RC and TOPs with the correct SOL because it had been operating with the incorrect calculation, as required by TOP-002-2.1b R4; c. did not operate within the SOLs during this outage, as required by TOP-004-2 R1; d. did not inform its RC that the RAS was operated in a degraded state, as required by IRO-005-3.1a R9; e. did not provide its RC with the following, as specified in its RC Data Specification: <ul style="list-style-type: none"> i. the correct boundary SOL; ii. the notifications of SOL exceedance and actions taken because BPA did not know the correct flow over the boundary path, nor did BPA report on the actions it should have taken to correct the problems; iii. boundary RAS being operated in a degraded state, as required by IRO-010-1a R3; and f. did not notify its RC of the SOL exceedances nor its actions to resolve them due to the lack of alarms that would have alerted BPA that there was an SOL exceedance, as required by TOP-007-0 R1. <p>These violations began on November 30, 2016 at 8:30 AM, when the work permit was issued, and ended on November 30, 2016 at 3:59 PM, when the work permit was released for a total of one day of noncompliance of each these Standards and Requirements.</p>						
<p>Risk Assessment</p>			<p>WECC determined that these violations in aggregate posed a moderate risk and did not pose a serious and substantial risk to the reliability of the BPS. In these instances, BPA failed to:</p> <ul style="list-style-type: none"> a. maintain a set of current plans that are designed to evaluate options and set procedures for reliable operation through a reasonable future time period. In addition, each BA and TOP shall be responsible for using available personnel and system equipment to implement these plans to ensure that interconnected system reliability will be maintained, as required by TOP-002-2.1b R1; b. coordinate (where confidentiality agreements allow) its current-day, next-day, and seasonal planning and operations with neighboring Balancing Authorities and TOPs and with its Reliability Coordinator, so that normal Interconnection operation will proceed in an orderly and consistent manner, as required by TOP-002-2.1b R4; c. have an Operational Planning Analysis that will allow it to assess whether its planned operations for the next day within its TOP Area will exceed any of its SOLs, as required by TOP-002-4 R1; d. inform its Reliability Coordinator when an IROL or SOL has been exceeded and the actions being taken to return the system to within limits, as required by TOP-007-0 R1; e. inform the Reliability Coordinator of the status of the Special Protection System including any degradation or potential failure to operate as expected, whenever a Special Protection System that may have an inter-BA, or inter-TOP impact (e.g., could potentially affect transmission flows resulting in a SOL or IROL violation) is armed, the Reliability Coordinators shall be aware of the impact of the operation of that Special Protection System on inter-area flows, as required by IRO-005-3.1a R9; and f. provide data and information, as specified, to the Reliability Coordinator(s) with which it has a reliability relationship, as required by IRO-010-1a R3. <p>In this case, BPA was already operating its system with the RAS in a degraded state. If BPA were to have lost another line, the RAS could have caused a loss of load and potentially opened the remaining lines entirely. Further, BPA implemented weak preventative controls. However, BPA implemented effective controls, this issue was discovered during a routine monitoring activity nine days after the issue</p>						

	<p>occurred, on December 9, 2016. As compensation, instead of setting the correct SOL, BPA instructed the main generation station for these lines to limit its generation to 650 MW. This action by BPA reduced the risk because instead of changing the SOL to address its mistake, it instructed the main generation station to limit its generation which then lowered the flows on the path without changing the SOL.</p>
Mitigation	<p>To mitigate this violation, BPA:</p> <ul style="list-style-type: none"> 1) BPA's Dispatch Manager sent a 10-point message to all dispatchers and its RC specifying the proper implementation of a SLIM for the boundary including the boundary RAS that was related to the lack of Protection System documentation; and 1) as of April 1, 2017, with new versions of the Standards, TOPs were no longer required to notify the RC of SOLs on internal paths nor status changes in RAS Schemes. As well, the Dispatchers were trained on a new use of SLIMs as part of the transition efforts to the new TOP and IRO Standards including how to implement them and what to communicate to the RC and other entities. The additional guidance provided through this training was specifically designed to avoid misunderstandings of when to follow guidance in a SLIM, rather than that provided in a DSO.
Other Factors	<p>WECC reviewed BPA's internal compliance program (ICP) and considered it to be a neutral factor.</p> <p>On August 22, 2014, in Southwestern Power Administration (SWPA) v. Federal Energy Regulatory Commission (FERC), the United States Court of Appeals for the District of Columbia Circuit unanimously ruled that FERC, and by extension, the North American Electric Reliability Corporation (NERC) and the Regional Entities it oversees, such as WECC, could not impose monetary penalties against federal governmental entities such as SWPA. BPA is a federal governmental entity, and WECC is bound to follow SWPA v. FERC in the resolution of this matter. Therefore, WECC has assessed no monetary penalty for this violation.</p> <p>WECC considered BPA's IRO-005-3.1a R9 compliance history and determined there were no relevant instances of noncompliance.</p>

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
WECC2017017585	IRO-010-1a	R3	Medium	Severe	11/30/2016 (when the work permit was issued)	11/30/2016 (when the work permit was released)	Self-Report	4/1/2017	12/21/2017
<p>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>			<p>On May 18, 2017, BPA submitted a Self-Report stating, as a Transmission Operator (TOP), it had a potential noncompliance with IRO-010-1a R3.</p> <p>On November 30, 2016, BPA was implementing an outage as a part of the boundary Remedial Action Scheme (RAS), which entailed line loss logic for three separate lines. BPA did not correctly implement the published Study Limit Information Memo (SLIM), as is required by BPA’s Operating Plan during the outage. The SLIM for this outage condition specified that a 650 MW System Operating Limit (SOL) should be set at the one boundary’s flowgate. The Dispatcher, however, implemented a restricted generation limit of 650 MW at the boundary generation station. BPA did not lower the boundary SOL from 1300 MW to 650 MW. This mistake resulted in BPA operating a boundary SOL that was 650 MW higher than the setting should have been. As a result, the boundary RAS was operated in a degraded state. In addition, BPA had not included the boundary RAS in the list of Special Protection Systems that were incorporated into the Coordinated Outage System and therefore not reported to BPA’s RC.</p> <p>The outage work that resulted in the boundary RAS is usually completed one line at a time. When the SLIM was issued in this case, the Dispatcher also reviewed a Dispatch Standing Order (DSO) but the guidance was not applicable. This misunderstanding between the SLIM and DSO resulted in BPA not manually entering the SOL into the control system. Because the lower SOL was not entered in the control system, the alarm monitoring did not alert to three SOL exceedances between 2:15 PM and 2:45 PM on November 30, 2016. Due to the lack of alarms, the Dispatcher did not realize there were SOL exceedances.</p> <p>The root cause of the violations associated with TOP-002-2.1b R1, TOP-002-2.1b R4, TOP-004-2 R1, TOP-007-0 R1 and IRO-010-1a R3 was attributed to the confusion of the Dispatcher as to which operating instructions he should follow during an outage--between the SLIM and the DSO. For the violation associated with IRO-005-3.1a R9, the root cause was attributed to BPA’s violation of TOP-002-2.1b R1. As a result, BPA:</p> <ul style="list-style-type: none"> a. did not correctly implement its Operating Plan using the SLIM, as required by TOP-002-2.1b R1; b. did not provide its neighboring RC and TOPs with the correct SOL because it had been operating with the incorrect calculation, as required by TOP-002-2.1b R4; c. did not operate within the SOLs during this outage, as required by TOP-004-2 R1; d. did not inform its RC that the RAS was operated in a degraded state, as required by IRO-005-3.1a R9; e. did not provide its RC with the following, as specified in its RC Data Specification: <ul style="list-style-type: none"> i. the correct boundary SOL; ii. the notifications of SOL exceedance and actions taken because BPA did not know the correct flow over the boundary path, nor did BPA report on the actions it should have taken to correct the problems; iii. boundary RAS being operated in a degraded state, as required by IRO-010-1a R3; and f. did not notify its RC of the SOL exceedances nor its actions to resolve them due to the lack of alarms that would have alerted BPA that there was an SOL exceedance, as required by TOP-007-0 R1. <p>These violations began on November 30, 2016 at 8:30 AM, when the work permit was issued, and ended on November 30, 2016 at 3:59 PM, when the work permit was released for a total of one day of noncompliance of each these Standards and Requirements.</p>						
<p>Risk Assessment</p>			<p>WECC determined that these violations in aggregate posed a moderate risk and did not pose a serious and substantial risk to the reliability of the BPS. In these instances, BPA failed to:</p> <ul style="list-style-type: none"> g. maintain a set of current plans that are designed to evaluate options and set procedures for reliable operation through a reasonable future time period. In addition, each BA and TOP shall be responsible for using available personnel and system equipment to implement these plans to ensure that interconnected system reliability will be maintained, as required by TOP-002-2.1b R1; h. coordinate (where confidentiality agreements allow) its current-day, next-day, and seasonal planning and operations with neighboring Balancing Authorities and TOPs and with its Reliability Coordinator, so that normal Interconnection operation will proceed in an orderly and consistent manner, as required by TOP-002-2.1b R4; i. have an Operational Planning Analysis that will allow it to assess whether its planned operations for the next day within its TOP Area will exceed any of its SOLs, as required by TOP-002-4 R1; j. inform its Reliability Coordinator when an IROL or SOL has been exceeded and the actions being taken to return the system to within limits, as required by TOP-007-0 R1; k. inform the Reliability Coordinator of the status of the Special Protection System including any degradation or potential failure to operate as expected, whenever a Special Protection System that may have an inter-BA, or inter-TOP impact (e.g., could potentially affect transmission flows resulting in a SOL or IROL violation) is armed, the Reliability Coordinators shall be aware of the impact of the operation of that Special Protection System on inter-area flows, as required by IRO-005-3.1a R9; and l. provide data and information, as specified, to the Reliability Coordinator(s) with which it has a reliability relationship, as required by IRO-010-1a R3. <p>In this case, BPA was already operating its system with the RAS in a degraded state. If BPA were to have lost another line, the RAS could have caused a loss of load and potentially opened the remaining lines entirely. Further, BPA implemented weak preventative or detective controls. However, as compensation, instead of setting the correct SOL, BPA instructed the main generation station for these lines limit its generation to 650 MW. This action by BPA reduced the risk because instead of changing the SOL to address its mistake, it instructed the main generation station to limit its generation which then lowered the flows on the path without changing the SOL.</p>						

Mitigation	<p>To mitigate this violation, BPA:</p> <ol style="list-style-type: none"> 1) BPA’s Dispatch Manager sent a 10-point message to all dispatchers and its RC specifying the proper implementation of a SLIM for the boundary including the boundary RAS that was related to the lack of Protection System documentation; 2) as of April 1, 2017, with new versions of the Standards, TOPs were no longer required to notify the RC of SOLs on internal paths nor status changes in RAS Schemes; and 3) the Dispatchers were trained on a new use of SLIMs as part of the transition efforts to the new TOP and IRO Standards including how to implement them and what to communicate to the RC and other entities. The additional guidance provided through this training was specifically designed avoid misunderstandings of when to follow guidance in a SLIM, rather than that provided in a DSO.
Other Factors	<p>On August 22, 2014, in Southwestern Power Administration (SWPA) v. Federal Energy Regulatory Commission (FERC), the United States Court of Appeals for the District of Columbia Circuit unanimously ruled that FERC, and by extension, the North American Electric Reliability Corporation (NERC) and the Regional Entities it oversees, such as WECC, could not impose monetary penalties against federal governmental entities such as SWPA. BPA is a federal governmental entity, and WECC is bound to follow SWPA v. FERC in the resolution of this matter. Therefore, WECC has assessed no monetary penalty for this violation.</p> <p>WECC considered BPA’s compliance history and determined there were no relevant instances of noncompliance.</p>

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
WECC2018020114	PRC-005-2(i)	R3	High	Lower	1/1/2016 (when IPCO missed the first 18-month maintenance interval)	7/14/2017 (when IPCO completed maintenance activities for the VLA battery)	Self-Report	7/2/2018	3/1/2019
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 July 24, 2018, IPCO submitted a Self-Report stating, as a Transmission Owner, it was in potential noncompliance with PRC-005-2(i) R3.</p> <p>Specifically, IPCO did not maintain one Protection System Station Vented Lead-Acid (VLA) battery used for emergency situations to power communications equipment during an emergency outage at a 230 kV substation for two 18-month intervals, as required by PRC-005-2(i) R3, Table 1-4(a). The VLA battery was maintained on June 30, 2014, however this issue began on January 1, 2016, when IPCO missed the first 18-month maintenance interval and ended on July 14, 2017, when IPCO completed maintenance activities for the VLA battery, for a total of 561 days. The root cause of the issue was attributed to a miscommunication between different departments. Specifically, a Transmission and Distribution Engineer disabled the battery maintenance trigger because he understood that the Communications group was responsible for tracking the maintenance and testing activities. However, the change in responsibility was not communicated to the Communications group, resulting in a miscommunication about the final responsibility for the maintenance of this VLA battery. As well, the secondary maintenance trigger in IPCO's management system had been inadvertently disabled, thus removing the VLA battery from tracking.</p>						
Risk Assessment			<p>This violation posed a minimal risk and did not pose a serious and substantial risk to the reliability of the BPS. In this instance, IPCO failed to maintain one VLA battery included within the time-based maintenance program in accordance with the minimum maintenance activities and maximum maintenance intervals prescribed within Table 1-4(a), as required by the Standard. Such failure could result in local service interruption and possibly increased restoration time during an emergency at the substation.</p> <p>However, as compensation, the VLA battery voltage was continuously monitored by the energy management system (EMS) during the timeframe of the violation. Had a battery failure occurred during an outage, the System Operators would have received a generalized summary alarm and a technician would have been sent on-site to identify the reason for the alarm.</p>						
Mitigation			<p>To mitigate this violation, IPCO:</p> <ol style="list-style-type: none"> 1) completed maintenance activities on one affected VLA battery; 2) requested staff to identify and report to leadership gaps in maintenance at the time issues of noncompliance are discovered; 3) implemented new policy that any changes to maintenance activity testing were to be reviewed monthly by the Communications Engineer to prevent inadvertent responsibility changes that caused these maintenance triggers for the VLA battery to be disabled; and 4) the Protection System Maintenance Program (PSMP) was updated to reflect a new review of changes to maintenance settings. 						
Other Factors			<p>WECC reviewed IPCO's internal compliance program (ICP) and considered it to be a neutral factor in the penalty determination.</p> <p>WECC considered IPCO's PRC-005 compliance history to be an aggravating factor in determining the disposition track specifically NERC Violation IDs WECC200800628, WECC200901452, WECC201102886 and WECC2017017203.</p>						