

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
WECC2016015841	MOD-029-1a	R2, R2.6	Lower	Lower	5/15/2016 (when BPA did not correctly allocate the TTC for one ATC path)	5/15/2016 (when it corrected the TTC allocation for the ATC path)	Self-Report	8/31/2016	4/4/2017
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 June 21, 2016 BPA submitted a Self-Report stating, as a Transmission Operator (TOP), it was in violation of MOD-029-1a R2, R2.6.</p> <p>Specifically, on May 15, 2016, BPA incorrectly allocated the Total Transmission Capability (TTC) for one Available Transmission Capability (ATC) path when incorporating an outage in the Western Interconnection. BPA had a contractual allocation agreement with another TOP that required the TTC to be shared pro-rata during an outage. However, BPA did not reduce the TTC for the ATC path, but instead took the entire reduction. According to the contractual allocation agreement, the entities were required to reduce pro-rata to account for the outage. BPA corrected the TTC allocation that same day. The root cause of this instance was attributed to the desk-level procedure not addressing governance of the allocation of the shared ownership in the ATC path. This violation began on May 15, 2016 when BPA did not correctly allocate the TTC for one ATC path, and ended on May 15, 2016 when it corrected the TTC allocation for the ATC path for a total of one day of noncompliance.</p>						
Risk Assessment			<p>This violation posed a minimal risk and did not pose a serious and substantial risk to the reliability of the Bulk Power System (BPS). In this instance, BPA failed to use the following process to determine TTC: where multiple ownership of Transmission rights exists on an ATC Path, allocate TTC of that ATC Path in accordance with the contractual agreement made by the multiple owners of that ATC Path, as required by MOD-029-1a R2. In this instance, BPA did not reduce the TTC for the ATC path, instead it took the entire reduction. Such failure is a commercial operational issue and presents a negligible potential harm to the reliability of the BPS.</p> <p>BPA implemented weak preventative controls to prevent the violation. As a compensation, MOD-029-2a is proposed for retirement due to its focus on commercial operations instead of the potential harm to the reliability of the BPS. In addition, the duration of the violation was one day, thus reducing the risk.</p>						
Mitigation			<p>To mitigate this violation, BPA:</p> <ol style="list-style-type: none"> 1) allocated the correct TTC; 2) conducted extensive training with staff on properly allocating TTCs in outage conditions across the ATC paths; 3) MOD-029-2a is proposed for retirement by NERC due to its emphasis on contractual agreements and minimal effects to reliability of the BPS; 4) tested different ways that real-time Schedulers can access the screens where outage ownership is allocated to ensure that system functionality worked properly in all cases. BPA indicated no responses that indicated the Schedulers accessed the screens differently than the tests revealed; 5) tested systems to ensure that functionality to update ownership shares is working correctly based on how the outage ownership screen can be accessed; 6) clarified its desk-level procedure that covers governing the allocation of the shared ownership ATC path and addresses the identified process gap; and 7) required Real-Time staff to review the revised desk-level procedure and sign the sheet indicating they have reviewed and understand it. 						
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 MOD-029-1a R2 and MOD-029-2a R2 compliance history to be an aggravating factor in determining the disposition track specifically NERC Violation IDs WECC2015014760, WECC201102885 and WECC2015015334.</p>						

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WECC2018019868	MOD-029-2a	R2, R2.6	Lower	Lower	6/4/2018 (when BPA did not correctly allocate the TTC for one ATC path)	6/4/2018 (when BPA corrected the TTC allocation for the ATC path)	Self-Report	7/11/2018	4/4/2019
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 June 15, 2018, BPA submitted a Self-Report stating, as a Transmission Operator (TOP), it was in violation of MOD-029-2a R2, R2.6.</p> <p>Specifically, on June 4, 2018, BPA correctly posted the TTC on one ATC path, but did not correctly allocate between affected Transmission Owners (TOs) while allocating a seasonal limit, as required by its contractual allocation agreement. BPA allocated an additional 16 MW for one entity and 16 MW below the requirement for another entity. Further, there were no curtailments during this time. However, BPA corrected the TTC allocation that same day. The root cause of this instance was attributed to the desk-level procedure not specifying how to allocate the TTC during a seasonal limit. This violation began on June 4, 2018, when BPA did not correctly allocate the TTC for one ATC path, and ended on June 4, 2018, when BPA corrected the TTC allocation for the ATC path for a total of one day of noncompliance.</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, BPA failed to use the following process to determine TTC: where multiple ownership of Transmission rights exists on an ATC Path, allocate TTC of that ATC Path in accordance with the contractual agreement made by the multiple owners of that ATC Path, as required by MOD-029-2a R2. In this instance, BPA correctly posted the TTC on one ATC path, but did not correctly allocate between the TOs while allocating a seasonal limit, as required by its contractual allocation agreement. Such failure is a commercial operational issue, and presents a negligible potential harm to the reliability of the BPS.</p> <p>BPA implemented weak preventative controls to prevent the violation. However, BPA implemented strong detective controls; specifically, it implemented a process for conducting next day capacity checks that detected the instance on June 4, 2018 with MOD-029-2a R2. As compensation, MOD-029-2a is proposed for retirement due to its focus on commercial operations instead of the potential harm to the reliability of the BPS. In addition, the duration of each of the violation was one day, thus reducing the risk.</p>						
Mitigation			<p>To mitigate this violation, BPA:</p> <ol style="list-style-type: none"> 1) allocated the correct TTC; 2) MOD-029-2a is proposed for retirement by NERC due to its emphasis on contractual agreements and minimal affects to reliability of the BPS; 3) reinforced the training on the proper allocation for seasonal ratings; and 4) clarified the desk-level procedure to make the allocation of seasonal ratings across this path clearer and provided training on the update desk-level procedure to the Real-time schedulers. 						
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 MOD-029-1a R2 and MOD-029-2a R2 compliance history to be an aggravating factor in determining the disposition track specifically NERC Violation IDs WECC2015014760, WECC201102885 and WECC2015015334.</p>						

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WECC2016015730	MOD-029-1a	R3	Lower	Severe	3/27/2016 (when BPA did not establish the correct SOL for the ATC path) 4/2/2016 (when BPA did not establish the correct SOL for the ATC path) 4/8/2016 (when BPA did not establish the correct SOL for the ATC transmission path)	9/6/2016 (when BPA corrected its calculation for TRM for SOLs between 2000 MW and 2500 MW)	Self-Report	10/30/2018	3/7/2019
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 May 6, 2016, BPA submitted a Self-Report stating, as a Transmission Operator, it was in violation of MOD-029-1a R3.</p> <p>Specifically, on February 3, 2016, BPA implemented a 450 MW Transmission Reliability Margin (TRM) for one Available Transfer Capability (ATC) transmission path to account for uncertainties arising from simultaneous path interactions when the System Operating Limit (SOL) across the ATC transmission path is above 2,000 MW. TRM is the amount of transmission transfer capability needed to account for the inherent uncertainty in system conditions and the need for operating flexibility to ensure reliable system operation as system conditions change. However, on three occasions, BPA set its TTC lower than the lowest provided SOL for the ATC transmission path for the implementation of the TRM. Effectively, this resulted in BPA not having a correct TRM methodology for calculating TRMs for 2,000 - 2,500 MW. The details of each occurrence are explained below.</p> <p>On March 27, 2016, BPA’s SOL for the ATC transmission path was 2,500 MW for all hours. However, the joint owner for the ATC transmission path showed an SOL of 2,200 MW for one transmission line and 2,300 MW for another transmission line. BPA did not have a process to establish a TRM for the SOLs of 2,200 MW or 2,300 MW and yet it posted an SOL of 2,000 MW without TRM for all hours. Such failure could potentially delay the system restoration time of the neighboring entity or require the neighboring entity to shed load for a contingency. This instance of the violation occurred on March 27, 2016, when BPA did not establish the correct SOL for the ATC path, and ended on September 6, 2016, when BPA corrected its calculation for TRM for SOLs between 2000 MW and 2500 MW, for a total of 164 days of noncompliance.</p> <p>On April 2, 2016, for the ATC transmission path mentioned previously, BPA’s SOL was 2,500 MW and again the joint owner’s SOL was 2,300 MW. Since BPA did not have a process for calculating TRM for an SOL of 2,300 MW, BPA posted an SOL of 2,000 MW for all hours. Such failure could potentially delay the system restoration time of the neighboring entity or require the neighboring entity to shed load for a contingency. This instance of the violation occurred on April 2, 2016, when BPA did not establish the correct SOL for the ATC path, and was remediated on September 6, 2016, when BPA corrected its calculation for TRM for SOLs between 2000 MW and 2500 MW, for a total of 158 days of noncompliance.</p> <p>On April 8, 2016, at 4:14 PM, BPA received an increase to the SOL from 2,000 MW to 2,500 MW, from the joint owner of the ATC transmission path. BPA managed the transmission path scheduling every 15 minutes. However, BPA did not update the SOL for the two transmission lines, as was required, for the next scheduling increment; but instead only updated the SOL for one transmission line. BPA made this choice because its system functionality had restrictions that did not allow for it to make TRM updates in 15-minute increments, with the 2,500 MW SOL. This instance of the violation occurred on April 8, 2016, when BPA did not establish the correct SOL for the ATC transmission path, and ended on September 6, 2016, when BPA corrected its calculation for TRM for SOLs between 2000 MW and 2500 MW, for a total of 152 days of noncompliance.</p> <p>The root cause was attributed gaps in the BPA’s process for calculating the correct TRM methodology for 2,000 - 2,500 MW, so BPA set its TTC lower than the lowest provided SOL for the ATC transmission path for the implementation of the TRM.</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 these instances, BPA failed to establish the TTC at the lesser of the value calculated in R2 or any SOL for its ATC Path, as described above, pursuant to MOD-029-1a R3. Such failure is a commercial operational issue, rather than a risk to the reliability of the BPS. MOD-029-1a R3 was retired March 31, 2017.</p>						

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WECC2016015730	MOD-029-1a	R3	Lower	Severe	3/27/2016 (when BPA did not establish the correct SOL for the ATC path) 4/2/2016 (when BPA did not establish the correct SOL for the ATC path) 4/8/2016 (when BPA did not establish the correct SOL for the ATC transmission path)	9/6/2016 (when BPA corrected its calculation for TRM for SOLs between 2000 MW and 2500 MW)	Self-Report	10/30/2018	3/7/2019
			BPA had weak preventative controls to prevent the above noncompliance. However, BPA had effective detective controls to identify the noncompliance and upon doing so, remediated timely, thereby lessening the risk to the BPS. Specifically, the operations scheduling lead identified the noncompliance, during a compliance review. Further, as compensation, BPA posted a lower SOL across the ATC transmission path associated with this instant violation, which reduces risk of overloading the line or damaging equipment. No harm is known to have occurred.						
Mitigation			<p>To mitigate this violation, BPA:</p> <ol style="list-style-type: none"> 1) implemented a process that allowed the correct TTC for the ATC Path with a TRM for SOLs falling between 2,000 MW and 2,500 MW; 2) modified the NI SCADA screen to help prevent future user error; 3) sent an email reminder to Dispatch staff, reviewing the procedure for sending updated SOL's to Schedule; 4) completed functionality requirements to automate the TRM entry that is required to submit requirements to vendor; 5) reviewed system change order from vendor that incorporates the requirements and made any needed adjustments; 6) implemented functionality to production environment; 7) adjusted processes to account for the new functionality; 8) trained staff on the new functionality and processes; and 9) MOD-029-1a was retired March 31, 2017, and the successor requirement is proposed for retirement. 						
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 MOD-029-1a compliance history to be an aggravating factor in determining the disposition track specifically NERC Violation IDs WECC2011008668 and WECC2013011728.</p>						

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WECC2016016711	PRC-005-2(i)	R3	High	Lower	10/1/2015 (when BPA did not perform the required maintenance tasks for one VLA control battery)	12/20/2016 (when BPA completed the required maintenance tasks for one VLA control battery)	Self-Report	3/16/2017	4/25/2017
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 December 23, 2016, BPA submitted a Self-Report stating, as a Transmission Owner (TO,) it was in violation of PRC-005-2(i) R3.</p> <p>Specifically, on December 19, 2016 during evidence gathering for a Self-Certification, BPA found one Vented Lead-Acid (VLA) control battery at one substation that was not inspected for unintentional grounds, per Table 1-4(a) of the Standard and Requirement. The required unintentional grounds inspections were not recorded for two reasons: first, BPA incorrectly thought that because the VLA control battery did not have automated ground detection equipment, the maintenance activities were not required; second, in July 2015, BPA had assessed that the substation subject to this violation did not support the BES elements, and therefore, the VLA control battery was not subject to the requirements of the Standard. However, in December 2016, BPA corrected its assumption because the VLA control battery at the substation supported distributed Under Frequency Load Shedding (UFLS), which qualified the VLA control battery as a BES element and subject to the requirements of PRC-005. As a result, BPA found one VLA control battery that did not have the required maintenance activities as far back as October 1, 2015 for its required four-month calendar intervals. This violation began on October 1, 2015, when BPA did not perform the required maintenance tasks for one VLA control battery, and ended on December 20, 2016, when BPA completed the required maintenance tasks for one VLA control battery, for a total of 447 days of noncompliance.</p> <p>The root cause of this violation was attributed to BPA's incorrect assumption regarding the requirements for Bulk Electric System (BES) elements, for one of its substations as well as an incorrect assumption about the lack of associated automated ground detection equipment, resulting in one VLA control battery not being included in the maintenance activities.</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, BPA failed to maintain its Protection System Components that are included within the time-based maintenance program, for one VLA control battery in accordance with maximum maintenance intervals prescribed within Table 1-4(a) of PRC-005-2(i) R3.</p> <p>However, as a compensating measure, the VLA control battery subject to this violation did not require any settings changes, once the inspections were completed. In addition, BPA's substation operations group performed monthly inspections on all control batteries. Even though the maintenance was not performed, the battery had been inspected, thus reducing the potential harm to the BPS.</p>						
Mitigation			<p>To mitigate this violation, BPA:</p> <ol style="list-style-type: none"> 1) completed VLA control battery device inspection/maintenance; 2) confirmed the application of applicable inspection forms for all control batteries subject to the Standard; 3) reviewed and documented locations that support UFLS, utilizing the BES definition and confirmed that all control batteries at those locations were correctly identified; 4) reviewed and documented alignment of the "yes" BES Cascade indicator and PRC-005 subject equipment to ensure the applicable Control Batteries were marked; 5) updated Operations Inspection Standard language to clarify that locations with automated ground detection to alert staff that they will have manual readings completed until automated panels are installed; 6) updated substation maintenance control battery Subject Matter Expert document to outline feasibility of installing ground detection equipment at applicable locations; and 7) added the missing VLA control battery to the work management system as well as the voltage readings added to the other monthly readings. 						
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 PRC-005-2(i) R3 compliance history to be an aggravating factor in determining the disposition track specifically NERC Violation IDs WECC2015015392, WECC2016016710, WECC201103045 and WECC2013012135.</p>						

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NPCC2019021852	FAC-008-1	R1., R1.3	Lower	Moderate	08/23/2007	07/11/2019	Self-Report	09/04/2019	09/19/2019
Description of the Noncompliance (For purposes of this document, each noncompliance at issue is described as a “noncompliance,” regardless of its procedural posture and whether it was a possible, or confirmed violation.)		<p>On July 18, 2019, FirstLight Hydro Generating Company (the Entity) submitted a Self-Report stating that, as a Generator Owner (GO), it was in violation of FAC-008-3 R1. Based on additional information received from the Entity, NPCC has determined that FAC-008-1 R1 is more appropriate for processing this violation. During a periodic internal compliance review of the Cabot generating station Facility Rating documentation, the Entity hired an outside consultant to undertake a comprehensive evaluation of the ampacity rating methodology utilized for various transition equipment (e.g. short sections of cables, cable jumpers) in service from the collector bus up to the low side terminals of the main generator step-up transformer (GSU) at the Point of Interconnection (POI). The purpose of this assessment was to determine ampacity ratings using methods consistent with industry standards recommended by the standard/requirement (e.g. IEEE) with the aid of the Electrical Transient Analyzer Program (ETAP) computer software as opposed to the previous method of simply adopting the Original Equipment Manufacturer's (OEM) specifications and ratings. By implementing this improved methodology, new ampacity ratings were calculated for several components that had been designed and installed between 2001 and 2006, when the plant was owned by the local Transmission Owner (TO). The assessment, completed in July 2019, determined that the corrected ratings for a number of these components limit the Cabot generating station's rated capacity. The Entity determined that the Cabot generating station was the only facility impacted and the following elements were determined to be undersized: the cable spacing from the Switchgear through rooftop conduit penetration; the rooftop rectangular bar transition; the aluminum conductor steel-reinforced cable (ACSR) overhead conductors; the ACSR transition conductors to substation tubular bus; the open air tubular bus sections; and the transition from air tubular bus section to Transformer LV bushing.</p> <p>NPCC determined the cause of the violation was a failure to detect the errors in the facility rating sheet. The contributing cause was that the station was upgraded between 2001 and 2006 when the plant was owned by the local TO (there have been three ownership changes since that time). The design work was done in 2000. During the station upgrade, new components were installed that have subsequently been identified as being undersized and/or improperly rated.</p> <p>NPCC determined that this violation spans two versions of the Reliability Standard, as follows:</p> <ul style="list-style-type: none"> • FAC-008-1 R1, from August 23, 2007, when the Entity registered as a GO for the Cabot generating station until December 31, 2012 (the standard's retirement date); and • FAC-008-3 R1, from January 1, 2013 to July 11, 2019, when the Entity reduced the Cabot generating station maximum output by approximately 21.5 MVA to prevent overloading limiting electrical equipment. <p>NPCC further determined that, for purposes of this violation, there was no substantive change in the Entity’s compliance obligations under the two applicable Standard Requirements.</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>Failure to install electrical equipment between a generator’s terminals and its GSU with adequate ampacity ratings that are consistent with established industry standards (e.g. ANSI and IEEE) may limit a generator’s output capacity. The Entity's Cabot generating station is a conventional six-unit hydro-electric generating facility with an aggregate nameplate rating of 77.5 MVA and interconnected to the Entity's host TO at a 115 kV substation. On July 11, 2019, after notifying its Reliability Coordinator (RC), ISO-NE, that several electrical components limit the Cabot generating station's rated capacity, the Entity reduced its output at the POI to 56 MVA and or/44.5 MW, the maximum power output allowed by the most limiting piece of equipment at the station. The Cabot generating station is continuously monitored via its SCADA system for real time operating data, alerts, alarms and trips. Historical data from June 1, 2016 through August 7, 2019 show that the current de-rated output capacity of 56 MVA has been exceeded 24 percent of the time with a maximum value of 69.54 MVA. However, the aforementioned engineering evaluation found no evidence of thermal stress on those electrical components that have been determined to have lower ampacity ratings than previously calculated. The Cabot generating station has a rated capacity that is approximately 3% of its RC's 2600 MW required Operating Reserves and has been operated at an average annual capacity factor of 54.4% in the period 2015-2018. Therefore, the Entity's RC could have adequately compensated for a potential generation outage arising from this instance of noncompliance.</p> <p>No harm is known to have occurred as a result of this violation.</p>							
Mitigation		<p>To mitigate the violation, the Entity:</p> <ol style="list-style-type: none"> 1. in coordination with its RC, ISO-NE, reduced the Cabot generating station maximum output in order to reflect the most limiting equipment in service at the station; 2. revised its Facility Rating Sheet to reflect the corrected ampacity ratings for the aforementioned electrical equipment; and 3. enhanced its existing procedure with language requiring: <ol style="list-style-type: none"> a. responsible staff to track, document, review, and approve any changes to Facility Rating Sheet(s); and b. designated personnel to receive training on this procedure as well as the most current version of the NERC Standard FAC-008. 							

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NPCC2019021852	FAC-008-1	R1., R1.3	Lower	Moderate	08/23/2007	07/11/2019	Self-Report	09/04/2019	09/19/2019
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 this violation posed a minimal risk to the reliability of the BPS, the violation was not appropriate for compliance exception processing. The entity’s Facility Rating was incorrect for a significant duration of time, and the entity needed to reduce the output of its generator Facility to reflect the most limiting equipment in series at the station.</p>							