

March 31, 2020

VIA ELECTRONIC FILING

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

Re: **NERC Full Notice of Penalty regarding Western Area Power Administration – Rocky Mountain Region, FERC Docket No. NP20-__000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Notice of Penalty¹ regarding Western Area Power Administration – Rocky Mountain Region (WACM), NERC Registry ID# NCR05464,² with information and details regarding the nature and resolution of the violation³ discussed in detail in the Settlement Agreement attached hereto (Attachment 1), in accordance with the Federal Energy Regulatory Commission’s (Commission or FERC) rules, regulations, and orders, as well as NERC’s Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).⁴

NERC is filing this Notice of Penalty with the Commission because Western Electricity Coordinating Council (WECC) and WACM have entered into a Settlement Agreement to resolve all outstanding issues arising from WECC’s determination and findings of the violation of FAC-009-1 R1.

¹ *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards, Order No. 672, 114 FERC ¶ 61,104, order on reh’g, Order No. 672-A, 114 FERC ¶ 61,328 (2006); Notice of New Docket Prefix “NP” for Notices of Penalty Filed by the N. Am. Elec. Reliability Corp., Docket No. RM05-30-000 (February 7, 2008); Mandatory Reliability Standards for the Bulk-Power System, Order No. 693, 118 FERC ¶ 61,218, order on reh’g, Order No. 693-A, 120 FERC ¶ 61,053 (2007).*

² WACM was included on the NERC Compliance Registry as a Balancing Authority (BA), Planning Authority/Planning Coordinator (PA/PC), Transmission Owner (TO), Transmission Operator (TOP), Transmission Planner (TP), and Transmission Service Provider (TSP) on June 17, 2007.

³ For purposes of this document, each violation at issue is described as a “violation,” regardless of its procedural posture and whether it was a possible, alleged, or confirmed violation.

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

1325 G Street NW Suite 600
Washington, DC 20005
202-400-3000 | www.nerc.com

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According to the Settlement Agreement, WACM does not contest the violation, and has agreed to other remedies and actions to mitigate the instant violation and facilitate future compliance under the terms and conditions of the Settlement Agreement.

Statement of Findings Underlying the Violation

This Notice of Penalty incorporates the findings and justifications set forth in the Settlement Agreement, by and between WECC and WACM. The details of the findings are set forth in the Settlement Agreement and herein. This Notice of Penalty filing contains the basis for approval of the terms of the Settlement Agreement by the NERC Board of Trustees Compliance Committee (NERC BOTCC).

In accordance with Section 39.7 of the Commission’s regulations, 18 C.F.R. § 39.7 (2019), NERC provides the following summary table identifying each violation of a Reliability Standard resolved by the Settlement Agreement. Further information on the subject violation is set forth in the Settlement Agreement and herein.

Violation(s) Determined and Discovery Method								
*SR = Self-Report / SC = Self-Certification / CA = Compliance Audit / SPC = Spot Check / CI = Compliance Investigation								
NERC Violation ID	Standard	Req.	VRF/VSL	Applicable Function(s)	Discovery Method* & Date	Violation Start-End Date	Risk	Penalty Amount
WECC2018020399	FAC-009-1	R1	Medium/ Severe	TO	CA 8/31/2018	6/18/2007 - Present ⁵	Serious	No Penalty

FAC-009-1 R1 - OVERVIEW

During a Compliance Audit conducted August 20, 2018 through August 31, 2018, WECC determined WACM, as a Transmission Owner (TO), violated FAC-009-1 R1.

WACM discovered the violation while gathering evidence in preparation for a Compliance Audit. WECC Auditors reviewed the violation further during the Compliance Audit and found that from a sample of 10 Transmission Facilities, 50 percent of the Facility Ratings showed discrepancies between the actual and documented Facility Rating. Further analysis determined that WACM’s Facility Rating Methodology (FRM), when it was originally issued, combined several separate documents regarding ratings into a single Western Area Power Administration (WAPA)-wide methodology. This action codified the FRM into a single document, but did not represent a material change to the FRM. The initial FAC-009 ratings

⁵ The expected completion date for WACM’s mitigation is December 15, 2020.

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documentation was populated with historical ratings in existence when the FAC-009 Reliability Standard became effective. When the FRM was created, WACM did not verify the historical ratings in the FAC-009 documentation against the FRM because WACM personnel assumed the historical ratings were determined using the same methodology.

The full extent of condition for the violation will be determined, remediated, and mitigated by the established mitigation milestone dates, and finalized in the certification of the Completion of Mitigation. As of August 30, 2019, WACM reported that the Reliability Standard applied to 258 of its Transmission Facilities, and all Transmission Facilities have been verified. Of those, 180 Transmission Facilities had corrected Facility Ratings above or equal to the previously documented Facility Ratings, and 78 Transmission Facilities had corrected Facility Ratings below the previously documented Facility Ratings. Additionally, WACM had 35 transformers applicable under the Reliability Standard. Of those, 25 transformers had corrected Facility Ratings above or equal to the previously documented Facility Ratings, and 10 transformers had corrected Facility Ratings below the previously documented Facility Rating.

The root cause of the violation was an insufficient process to establish and effectively document Facility Ratings.

WECC determined that this violation posed a serious and substantial risk to the reliability of the bulk power system (BPS). WACM failed to establish Facility Ratings for its solely owned Facilities that are consistent with its associated FRM. One of the samples with an incorrect Facility Rating was on a WECC Major Transfer Path. A failure to have Facility Ratings consistent with its FRM could result in WACM inaccurately identifying the most limiting Element of the Facility and lead to an incorrect Facility Rating above the most limiting Element. This can result in WACM operating equipment above appropriate ratings, resulting in overloads, unexpected outages, or operating in unstudied conditions.

WACM did not implement effective preventive or detective controls; however, existing data on line loadings was examined. The data shows the highest line loadings tend to be 50 percent of the published ratings. The Facility rating of the most limiting Elements have been higher than the historical line loadings. Attachment 1 includes the facts regarding the violation that WECC considered in its risk assessment.

WACM submitted its Mitigation Plan on May 28, 2019, to address the referenced violation. WACM has not yet completed all of its mitigation activities. To address the interim risk, WACM will continue updating its tracking software that monitors the modification of existing equipment, and will continue participating in Planning Coordination meetings and meet with maintenance personnel to monitor

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ongoing and planned maintenance work that affects the Facility Ratings. Attachment 1 includes a description of the activities WACM is taking to address interim risk of this violation.

WECC has received the WACM Mitigation Plan, and the proposed completion of the mitigation activities is December 15, 2020. Attachment 3 provides specific information on WACM'S intermediary target dates and what work will be done to ensure the Mitigation Plan meets its targeted completion date.

Regional Entity's Basis for Resolution of the Violation

According to the Settlement Agreement, WECC has assessed no penalty for the referenced violation. In reaching this determination, WECC considered the following factors:

1. WACM is a federal government entity, and WECC and NERC are bound to follow *Southwestern Power Administration (SWPA) v. Federal Energy Regulatory Commission (FERC)*⁶ in resolution of this matter;
2. The instant violation constitutes WACM's first violation of the subject NERC Reliability Standard;
3. WACM did not implement effective preventative or detective controls, as discussed in Attachment 1;
4. WACM had existing data on the line loadings, which showed the highest line loadings tend to be 50 percent of the published ratings, and Facility Rating of the most limiting Elements have been higher than the historical/actual line loadings;
5. There was no evidence of any attempt to conceal a violation nor evidence of intent to do so;
6. The violation of FAC-009-1 R1 posed a serious risk to the reliability of the BPS; and
7. There were no other mitigating or aggravating factors or extenuating circumstances that would affect the disposition method.

After consideration of the above factors, WECC determined that it would issue no penalty, in accordance with *SWPA v. FERC*.

⁶ *Sw. Power Admin. v. FERC*, 763 F.3d 27 (D.C. Cir. 2014).

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Statement Describing the Assessed Penalty, Sanction, or Enforcement Action Imposed⁷

Basis for Determination

Taking into consideration the Commission's direction in Order No. 693, the NERC Sanction Guidelines and the Commission's July 3, 2008, October 26, 2009 and August 27, 2010 Guidance Orders,⁸ the NERC BOTCC reviewed the violation on March 19, 2020 and approved the resolution between WECC and WACM. In approving the resolution, the NERC BOTCC reviewed the applicable requirements of the Commission-approved Reliability Standards and the underlying facts and circumstances of the violation at issue.

For the foregoing reasons, the NERC BOTCC approved the resolution and believes that the actions are appropriate for the violation and circumstances at issue, and is consistent with NERC's goal to promote and ensure reliability of the BPS.

Attachments to be Included as Part of this Notice of Penalty

The attachments to be included as part of this Notice of Penalty are the following documents:

1. Settlement Agreement by and between WECC and WACM executed December 31, 2019, included as Attachment 1;
2. WECC's Audit report for FAC-009-1 R1 dated September 14, 2018, included as Attachment 2;
3. WACM's Mitigation Plan designated as WECCMIT014405-2 submitted May 28, 2019, included as Attachment 3;

⁷ See 18 C.F.R. § 39.7(d)(4).

⁸ *N. Am. Elec. Reliability Corp., "Guidance Order on Reliability Notices of Penalty,"* 124 FERC ¶ 61,015 (2008); *N. Am. Elec. Reliability Corp., "Further Guidance Order on Reliability Notices of Penalty,"* 129 FERC ¶ 61,069 (2009); *N. Am. Elec. Reliability Corp., "Notice of No Further Review and Guidance Order,"* 132 FERC ¶ 61,182 (2010).

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

<p>*Persons to be included on the Commission’s service list are indicated with an asterisk. NERC requests waiver of the Commission’s rules and regulations to permit the inclusion of more than two people on the service list.</p> <p>Melanie Frye* President and Chief Executive Officer Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6882 (801) 883-6894 – facsimile mfrye@wecc.org</p> <p>Ruben Arredondo* Senior Legal Counsel Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 819-7674 (801) 883-6894 – facsimile rarredondo@wecc.org</p> <p>Heather Laws* Director of Enforcement Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 819-7642 (801) 883-6894 – facsimile hlaws@wecc.org</p>	<p>Edwin G. Kichline* Senior Counsel and Director of Enforcement Oversight North American Electric Reliability Corporation 1325 G Street NW Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile edwin.kichline@nerc.net</p> <p>Alain Rigaud* Associate Counsel North American Electric Reliability Corporation 1325 G Street NW Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile Alain.rigaud@nerc.net</p>
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Dawn Roth Lindell*
Senior VP & Rocky Mountain Regional Manager
Western Area Power Administration - Rocky
Mountain Region
PO Box 3700
Loveland, CO 80539
(970) 461-7201
lindell@wapa.gov

Christian Johnson*
Reliability Compliance Manager
Western Area Power Administration - Rocky
Mountain Region
5555 E Crossroads Blvd.
Loveland, CO 80538
(970) 461-7613
johnson@wapa.gov

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Conclusion

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

Respectfully submitted,

/s/ Alain Rigaud

Edwin G. Kichline
Senior Counsel and Director of
Enforcement Oversight
Alain Rigaud
Associate Counsel
North American Electric Reliability
Corporation
1325 G Street NW
Suite 600
Washington, DC 20005
(202) 400-3000
(202) 644-8099 - facsimile
edwin.kichline@nerc.net
alain.rigaud@nerc.net

cc: Western Area Power Administration – Rocky Mountain Region
Western Electricity Coordinating Council

Attachments

Attachment 1

Settlement Agreement by and between WECC and WACM executed
December 31, 2019



Heather M. Laws
Director, Enforcement
801-819-7642
hlaws@wecc.org

December 20, 2019

Dawn Roth Lindell
Senior VP & Rocky Mountain Regional Manager
Western Area Power Administration - Rocky Mountain Region
PO Box 3700
Loveland, CO 80539

NERC Registration ID: NCR05464

Subject: Revised Notice of Expedited Settlement Agreement

Dawn Roth Lindell,

I. Introduction

The Western Electricity Coordinating Council (WECC) hereby notifies the Western Area Power Administration – Rocky Mountain Region (WACM), that it identified Possible Violation of North American Electric Reliability Corporation (NERC) Reliability Standards (Reliability Standards) in the Preliminary Screen process.

WECC also determined, based on an assessment of the facts and circumstances of the Possible Violation addressed herein, evidence exists that WACM has an Alleged Violation of the Reliability Standards. By this Notice, WECC reminds WACM to retain and preserve all data and records relating to the Alleged Violation.

WECC reviewed the noncompliance referenced below and determined that this violation is an appropriate violation for disposition through the Expedited Settlement process. In determining whether or not to exercise its discretion to use this process, WECC considered all facts and circumstances related to the violation.

II. Alleged Violation

Standard and Requirement	NERC Violation ID	WECC Violation ID
FAC-009-1 R1	WECC2018020399	WECC2018-615130

The attached Expedited Settlement Agreement includes a summary of the facts and evidence supporting each Alleged Violation, as well as other factors affecting disposition determination.

III. Proposed Penalty or Sanction

The United States Court of Appeals for the District of Columbia Circuit (DC Circuit) overturned a Federal Energy Regulatory Commission (FERC) ruling affirming the imposition of monetary penalties and sanctions on the Southwestern Power Administration—like WAPA, an agency operating under the U.S. Department of Energy.¹ The DC Circuit determined that federal agencies are not subject to monetary penalties, in contrast to Registered Entities that are not federal agencies. As a result of this decision, WECC cannot issue a “monetary award against the federal government.”² However, the DC Circuit also determined that federal agencies are subject to FERC’s “jurisdiction to enforce compliance” and “subject to FERC’s imposition of non-monetary means of enforcement, such as compliance orders or directives, enforcement audits, and the like.”³ Therefore, WECC cannot issue a monetary penalty against WACM.⁴

WACM’s compliance history, including this violation, may inform WECC’s future monitoring and enforcement strategies. WECC considers the facts and circumstances related to a violation including, but not limited to: 1) Violation Risk Factor; 2) Violation Severity Level; 3) risk to the reliability of the Bulk Electric System (BES)⁵, including the seriousness of the violation; (4) Violation Time Horizon; 5) the violation’s duration; 6) the Registered Entity’s compliance history; 7) the Registered Entity’s self-reports and voluntary corrective action; 8) the degree and quality of cooperation by the Registered Entity in the audit or investigation process, and in any remedial action; 9) the quality of the Registered Entity’s compliance program; 10) any attempt by the Registered Entity to conceal the violation or any related information; 11) whether the violation was intentional; 12) any other relevant information or extenuating circumstances.

IV. Procedures for Registered Entity’s Response

If WACM accepts WECC’s proposal that the violation listed in the Agreement be processed through the Expedited Settlement process, WACM must sign the attached Agreement and submit it through the

¹ See *Southwestern Power Admin. v. FERC*, 763 F.3d 27 (D.C. Cir. 2014).

² *Id.*

³ *Id.*

⁴ *Id.*

⁵ “The Commission, the ERO, and the Regional Entities will continue to enforce Reliability Standards for facilities that are included in the Bulk Electric System.” (*Revision to Electric Reliability Organization Definition of Bulk Electric System*, 113 FERC ¶ 61,150 at P 100 (Nov. 18, 2010))



Revised Expedited Settlement Agreement

Western Area Power Administration - Rocky Mountain Region

CF1569

December 20, 2019

WECC Enhanced File Transfer (EFT) Server Enforcement folder **within 15 business days from the date of this Notice.**

If WACM does not accept WECC's proposal, WACM must submit a written rejection, through the EFT Server, **within five business days from the date of this Notice**, informing WECC of the decision not to accept WECC's proposal.

If WACM rejects this proposal or does not respond **within 15 business days**, WECC will issue a Notice of Alleged Violation.

V. Conclusion

In all correspondence, please provide the name and contact information of a representative from WACM who is authorized to address the above-listed Alleged Violation and who is responsible for providing the required Mitigation Plan. Please also list the relevant NERC Violation Identification Number in any correspondence.

Responses or questions regarding the Settlement Agreement or for further guidance regarding confidential treatment of CEII should be directed to Katherine Bennett, Senior Enforcement Analyst, at 801-883-6850 or kbennett@wecc.org.

Respectfully submitted,



Heather M. Laws

Director, Enforcement

Attachment: Expedited Settlement Agreement

cc: NERC Enforcement



ATTACHMENT
EXPEDITED SETTLEMENT AGREEMENT
OF
WESTERN ELECTRICITY COORDINATING COUNCIL
AND
WESTERN AREA POWER ADMINISTRATION - WACM

Western Electricity Coordinating Council (WECC) and Western Area Power Administration - ("WACM") (individually a "Party" or collectively the "Parties") agree to the following:

1. WACM does not contest the violation of the North American Electric Reliability Corporation ("NERC") Reliability Standard listed below.
2. The violation addressed herein will be considered a Confirmed Violation as set forth in the NERC Rules of Procedure.
3. This Settlement Agreement is subject to review and possible revision by NERC and the Federal Energy Regulatory Commission ("FERC").
4. The Parties enter into this Settlement Agreement to avoid extended litigation with respect to the matters described or referred to herein, to avoid uncertainty, and to effectuate a complete and final resolution of the issues set forth herein. The Parties agree that this Settlement Agreement is in the best interest of the Parties and in the best interest of Bulk Power System (BPS) reliability.
5. This Settlement Agreement represents a full and final disposition of the violation listed below, subject to approval or modification by NERC and FERC. The Parties hereby settle, release, and discharge each other from all known or unknown actions or causes of actions related to or associated with the violation set forth herein. The Parties waive their rights to further hearings and appeal; unless and only to the extent that either Party contends that any NERC or FERC action on this Settlement Agreement contains one or more material modifications to this Settlement Agreement.
6. In the event WACM fails to comply with any of the terms set forth in this Settlement Agreement, WECC may initiate further or other enforcement actions against WACM to the maximum extent allowed by federal law and the NERC Rules of Procedure. Except as otherwise specified in this



Expedited Settlement Agreement

Settlement Agreement, WACM shall, consistent with the NERC Rules of Procedure, retain all rights to defend against such enforcement actions.

7. This Settlement Agreement contains the full and complete understanding of the Parties regarding all matters set forth herein. The Parties agree that this Settlement Agreement reflects all of the terms and conditions of the matters described herein and no other promises, oral or written, have been made that are not reflected in this Settlement Agreement.
8. Each of the undersigned warrants that he or she is an authorized representative of the Party identified, is authorized to bind such Party and accepts the Settlement Agreement on the Party's behalf.
9. The undersigned representative of each Party affirms that he or she has read the Settlement Agreement, stipulates to the facts set forth in the Settlement Agreement, and that he or she understands that the Settlement Agreement is entered into by such Party in express reliance on those representations.
10. This Settlement Agreement and all terms and stipulations set forth herein shall become effective upon FERC's approval of the Agreement by order or operation of law.
11. NOW, THEREFORE, in consideration of the terms set forth herein the Parties hereby stipulate to the following:

I. NERC RELIABILITY STANDARD FAC-009-1 REQUIREMENT 1

NERC VIOLATION ID: WECC2018020399

WECC VIOLATION ID: WECC2018-615130

STANDARD

1. NERC Reliability Standard FAC-009-1 Requirement 1 states:

R1. The Transmission Owner and Generator Owner shall each establish Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings Methodology.

VIOLATION FACTS

1. During a Compliance Audit conducted August 20, 2018 through August 31, 2018, WECC determined the entity, as a Transmission Owner (TO), had a potential noncompliance with FAC-008-3 R6. However, WECC Enforcement later determined the start date of the violation

predates FAC-008-3 R6 and therefore the Standard and Requirement are changed to FAC-009-1 R1.

2. WACM discovered the issue with FAC-008-3 after receiving the Notice of Audit, as it gathered evidence in preparation for the audit. WECC Auditors reviewed the possible violation further during the Compliance Audit and found that from a sample of 10 Transmission Facilities, 50% of the Facility Ratings showed discrepancies between the actual Facility Rating and how the Facility Ratings had been documented. Further analysis determined that WACM's Facility Rating Methodology (FRM), when it was originally issued, combined several separate documents regarding ratings into a single Western Area Power Administration (WAPA)-wide methodology. This action codified the FRM into a single document, but it did not represent a material change to the FRM. The initial FAC-009 ratings documentation was populated with historical ratings in existence when the FAC-009 Reliability Standard became effective. At the time the FRM was created, WACM did not verify the historical ratings in the FAC-009 documentation against the FRM because entity personnel assumed the historical ratings had been determined using the same methodology, so there was no need to re-check the ratings.
3. The root cause of the violation was attributed to the lack of a sufficient process to establish and effectively document Facility Ratings. The ratings information was inconsistently documented, as well as stored in multiple locations. In addition, a contributing cause was the lack of internal controls to ensure how the Facility Ratings had been documented was accurate and complete. Specifically, when WACM implemented its WAPA-wide FRM, it established the ratings of the large equipment in its existing system; but WACM did not establish the ratings for every single Element, such as jumpers. As a result, WACM not only established inaccurate Facility Ratings when FAC-009-1 R1 became enforceable; but carried forward those historical inaccurate ratings. This issue began on June 18, 2007, when the Standard became mandatory and enforceable and is still ongoing. Given the extent of the Facility Rating discrepancies, the entire system for WACM is under review. Therefore, the full extent of condition for the violation will be determined, remediated and mitigated by the established mitigation milestone dates and finalized in the certification of the Completion of Mitigation.

RELIABILITY RISK ASSESSMENT

4. WECC determined this violation poses a serious and substantial risk to the reliability of the BPS. In this instance, WACM failed to establish Facility Ratings for its solely owned Facilities that are consistent with its associated Facility Ratings Methodology for an unknown number of Facilities in its entire transmission system. The final extent of condition will be addressed at the certification of the Completion of Mitigation, as described above.

5. WACM is responsible for operating, planning, coordinating, and/or maintaining total 5,146 miles of transmission lines. The transmission line voltages level varies from 115 kV to 345 kV. Of the 5,146 total miles of transmission line, 269 miles, 5%, are in the Eastern Interconnection. WACM has 9,266 MW of generation within its BA footprint while it only balances 4,219 MW of load. WACM is responsible for up to 10,178 MW of load and transfers combined. WACM owns and operates elements on four WECC Major Transfer Path and one of the samples with an incorrect Facility Rating was on a WECC Major Transfer Path. A failure to have Facility Ratings consistent with its Facility Ratings Methodology could result in WACM inaccurately identifying the most limiting Element of the Facility and lead to an incorrect Facility Rating above the most limiting Element. This can potentially result in WACM operating equipment above appropriate ratings, resulting in overloads, unexpected outages, or operating in un-studied conditions.
6. WACM did not implement effective preventative or detective controls. However, as compensation, existing data on line loadings was examined. The data shows the highest line loadings tend to be 50% of the published ratings. The Facility Rating of the most limiting Elements have been higher than the historical/actual line loadings.
7. WACM's mitigation is not complete. The following mitigating measures address the interim risk:
 - a. transmission planning studies have identified system violations in future years with the current Facility Ratings and Corrective Action Plans (CAP) have been developed for those Facilities;
 - b. transmission planning will continue to update its tracking software that monitors the modification of existing equipment; and
 - c. transmission planning will continue to participate in Planning Coordination meetings and meet with maintenance personnel to monitor ongoing and planning maintenance work that affects the Facility Ratings.

REMEDATION AND MITIGATION

8. On February 13, 2019, WACM submitted a Mitigation Plan to address its violation and on June 10, 2019, WECC accepted the Mitigation Plan.
9. As of February 15, 2019, WACM's first Facility Rating project status report revealed the interim extent of condition:
 - a. WACM had 259 Transmission Facilities applicable to the Standard:
 - i. 70 Transmission Facilities had actual Facility Ratings above or equal to the previously documented Facility Ratings;

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- ii. 74 Transmission Facilities had actual Facility Ratings below the previously documented Facility Ratings; and
 - iii. 115 Transmission Facilities were still being verified.
 - b. WACM had 29 transformers applicable to the Standard:
 - i. 14 transformers had actual Facility Ratings above or equal to the previously documented Facility Ratings;
 - ii. 12 transformers had actual Facility Ratings below the previously documented Facility Ratings; and
 - iii. 3 transformers were still being verified.
- 10. As of March 28, 2019, WACM's second Facility Rating project status report revealed the updated interim extent of condition:
 - c. WACM had 259 Transmission Facilities applicable to the Standard:
 - i. 88 Transmission Facilities had actual Facility Ratings above or equal to the previously documented Facility Rating;
 - ii. 80 Transmission Facilities had actual Facility Ratings below the previously documented Facility Rating; and
 - iii. 91 Transmission Facilities were still being verified.
 - d. WACM had 35 transformers applicable to the Standard, and all transformers have been verified:
 - i. 26 transformers had actual Facility Ratings above or equal to the previously documented Facility Rating; and
 - ii. 9 transformers had actual Facility Ratings below the previously documented Facility Rating.
- 11. As of June 30, 2019, WACM's third Facility Rating project status report revealed the updated interim extent of condition:
 - e. WACM had 258 Transmission Facilities applicable to the Standard:
 - i. 160 Transmission Facilities had actual Facility Ratings above or equal to the previously documented Facility Rating;
 - ii. 93 Transmission Facilities had actual Facility Ratings below the previously documented Facility Rating; and
 - iii. 5 Transmission Facilities are still being verified.
 - f. WACM had 35 transformers applicable to the Standard:
 - i. 25 transformers had actual Facility Ratings above or equal to the previously documented Facility Ratings; and
 - ii. 10 transformers had actual Facility Ratings below the previously documented Facility Ratings.

12. As of August 30, 2019, WACM's fourth Facility Rating project status report revealed an updated interim extent of condition:
 - g. WACM had 258 Transmission Facilities applicable to the Standard, all Transmission Facilities have been verified:
 - i. 180 Transmission Facilities had actual Facility Ratings above or equal to the previously documented Facility Ratings; and
 - ii. 78 Transmission Facilities had actual Facility Ratings below the previously documented Facility Ratings. This a decrease from the 93 in our June report. These determinations are based on information available at that time of the assessment. When each analysis was shared with the FR3C updated information (e.g. newer drawing versions and CT rating factors) were provided resulting in an updated determination moving some Transmission Facilities from the actual below list to the actual above or equal list or vice versa.
 - h. WACM had 35 transformers applicable to the Standard:
 - i. 25 transformers had actual Facility Ratings above or equal to the previously documented Facility Rating; and
 - ii. 10 transformers had actual Facility Ratings below the previously documented Facility Rating.
13. To remediate and mitigate this violation, WACM has:
 - a. determined the interim extent of condition of the violation with FAC-009-1 R1;
 - b. scheduled field and third-party verifications of the Facilities not sufficiently documented;
 - c. initially reviewed and verified equipment ratings for all Elements in a Facility Rating, and verified overall Facility Ratings for terminal equipment from all applicable FAC-008 Facilities;
 - d. defined the group that will review and approve the proposed Corrective Action Plan (CAP);
 - e. determined the processes that will be used to identify a proposed CAP for each Facility where the Facility Rating does not meet the correct Facility Rating,
 - f. started to evaluate the proposed CAP for potential impacts to the reliability of the BPS and other Standards;
 - g. started the Facility Rating Change Control Committee (FR3C) meetings to achieve consensus on each proposed CAP so the selected CAP can move to the execution phase;
 - h. updated and defined procedures and processes for personnel to follow as WACM corrects its Facility Ratings and Facility Rating database;
 - i. provided bi-monthly FAC-008 project status reports to WECC;

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- j. executed rating change notifications to both internal and external stakeholders, as required, once individual ratings were reviewed and approved by the FR3C; and
 - k. provided training on managing Facility Ratings to relevant staff.
14. To further remediate and mitigate this violation, WACM will:
- i. continue to provide bi-monthly Facility Rating project status report to WECC on November 14, 2019, January 14, 2020, March 14, 2020, May 14, 2020, July 14, 2020, September 14, 2020 and November 14, 2020;
 - j. complete field and third-party verifications to determine if the actual Facility Ratings will be used by March 26, 2020;
 - k. determine CAPs for each Facility that WACM's previously documented Facility Rating is not correct by August 23, 2020:
 - i. identify a proposed CAP for each Facility that does not have a correct Facility Rating WACM Transmission Planning will complete this step.
 - ii. evaluate the proposed CAP for potential impacts to the reliability of the BPS and impacts other Standards;
 - iii. continue with FR3C meetings to achieve consensus with all impacted stakeholders for each proposed CAP so the selected CAP can move to the execution phase for the associated Facility;
 - iv. the intermediary targets to complete 100% of this work by August 23, 2020 are:
 - 1. 25% complete by November 27, 2019;
 - 2. 50% complete by February 25, 2020;
 - 3. 75% completed by May 25, 2020;
 - 4. 100% complete by August 23, 2020;
 - l. execute CAPs for Facilities with a documented Facility Rating that is not the correct Facility Rating. Execute the CAP for each Facility as defined in the "create CAP Milestone" Activity resulting in correct Facility Ratings for all Facilities by December 15, 2020:
 - i. follow the existing processes to send out the revised FAC-008 document, and submit the appropriate changes to WECC for inclusion in the WECC base case models;
 - ii. the Transmission Planning team will run updated TPL assessments with revised ratings and develop new MOD-029 studies for Total Transfer Capability (TTC) changes, etc. (evidence will not be provided for completion of this activity as part of this mitigation plan);
 - iii. operations will update real time study ratings and conduct N-1 studies and also update SOLs (evidence will not be provided for completion of this activity as part of this mitigation plan);

Expedited Settlement Agreement

- iv. SCADA will review Level 1 and 2 alarms associated with revised FAC-008 document (evidence will not be provided for completion of this activity as part of this mitigation plan);
- v. protection will review protection schemes associated with the revised FAC-008 document (evidence will not be provided for completion of this activity as part of this mitigation plan); and
- vi. The intermediary targets to complete 100% of this work by December 15, 2020 are:
 - 1. 25% complete by March 30, 2020;
 - 2. 50% complete by June 30, 2020;
 - 3. 75% completed by September 30, 2020; and
 - 4. 100% complete by December 15, 2020.

15. WACM has not yet submitted a Mitigation Plan Completion Certification. Its proposed completion date is December 15, 2020.

[Remainder of page intentionally left blank - signatures affixed to following page]

Expedited Settlement Agreement

Agreed to and Accepted by:

WESTERN ELECTRICITY COORDINATING COUNCIL



Heather M. Laws
Director, Enforcement

12-31-2018
Date

WESTERN AREA POWER ADMINISTRATION – ROCKY MOUNTAIN REGION

DAWN LINDELL Digitally signed by DAWN LINDELL
Date: 2019.12.26 12:19:43 -07'00'

Dawn Roth Lindell
Senior VP & Rocky Mountain Regional Manager

Date

Attachment 2

WECC's Audit report for FAC-009-1 R1 dated September 14, 2018

Violation - Discovery Record

Registered Entity: Western Area Power Administration - Rocky Mountain Region

NERC Registry ID: NCR05464

NERC Violation ID: WECC2018020399

Discovery Method: Audit

Date Submitted: September 14, 2018

Region Contact: Mailee Cook

Phone: 801-883-6866 Email: mcook@wecc.biz

Standard: FAC-008-3 - Facility Ratings

Purpose: To ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on technically sound principles. A Facility Rating is essential for the determination of System Operating Limits.

Requirement: FAC-008-3 R6.

Each Transmission Owner and Generator Owner shall have Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings methodology or documentation for determining its Facility Ratings.

Violated Sub-Requirement(s):

Violated Function(s): Transmission Owner (TO)

Init Determ a VItn:

Begin Date of VItn: January 01, 2013

End Date:

Notified of VItn on: August 31, 2018

Potential Impact to BES:

Brief VItn Descr. & Cause: The entity is not following their Facility Ratings Methodology. The entity is currently investigating the Cause: most limiting element to determine the rating of their facilities.

Alleged Violation:

Registered Entity Report/Response:

Risk Factor: Medium

Severity Level: VSL - Severe

Factual Basis: Through data request DR-08, WACM demonstrated discrepancies between their facility ratings that are communicated to neighboring entities. This communication is completed though area planning such as

base case compilations. Operation studies also used these ratings. These ratings are listed in the WACM document WAPA-RMR FAC-008-3 spreadsheet. Five out of the ten facilities in the data request were not consistent with the facility ratings in WACM's facilities ratings spreadsheet.

Attachment 3

WACM's Mitigation Plan designated as WECCMIT014405-2 submitted
May 28, 2019

Mitigation Plan

Mitigation Plan Summary

Registered Entity: Western Area Power Administration - Rocky Mountain Region

Mitigation Plan Code: WECCMIT014405-2

Mitigation Plan Version: 3

<u>NERC Violation ID</u>	<u>Requirement</u>	<u>Violation Validated On</u>
WECC2018020399	FAC-009-1 R1.	01/14/2019

Mitigation Plan Submitted On: May 28, 2019

Mitigation Plan Accepted On: June 10, 2019

Mitigation Plan Proposed Completion Date: December 15, 2020

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by WACM On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Compliance Notices

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

- (1) The Registered Entity's point of contact for the Mitigation Plan, who shall be a person (i) responsible for filing the Mitigation Plan, (ii) technically knowledgeable regarding the Mitigation Plan, and (iii) authorized and competent to respond to questions regarding the status of the Mitigation Plan. This person may be the Registered Entity's point of contact described in Section B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Entity Information

Identify your organization:

Entity Name: Western Area Power Administration - Rocky Mountain Region

NERC Compliance Registry ID: NCR05464

Address: 5555 E. Crossroads Blvd.
Loveland CO 80538

Identify the individual in your organization who will serve as the Contact to the Regional Entity regarding this Mitigation Plan. This person shall be technically knowledgeable regarding this Mitigation Plan and authorized to respond to Regional Entity regarding this Mitigation Plan:

Name: Christian D. Johnson
Title: Reliability Compliance Manager
Email: johnson@wapa.gov
Phone: 970-461-7613

Violation(s)

This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2018020399	06/18/2007	FAC-009-1 R1.
The Transmission Owner and Generator Owner shall each establish Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings Methodology.		

Brief summary including the cause of the violation(s) and mechanism in which it was identified:

The WAPA Facility Rating Methodology (FRM) when it was originally issued combined several separate documents regarding ratings into a single WAPA-wide methodology document. This codified the ratings methodology in a single document and did not represent a material change to the methodology. The initial FAC-009 ratings document was populated with historical ratings in existence when the FAC-009 Reliability Standard became effective. At the time, the historical ratings were not checked against the FRM because they assumed the historical ratings had been determined using the same methodology, so there was no need to re-check the ratings. No information has been located which would confirm that an attempt was made to review and/or update the Ratings to match the FRM that was established when FAC-009-1 became effective.

This violation was identified in the WAPA-RMR audit of 2018. WAPA-RMR staff realized the possible violation, after the notice of audit, while validating the FAC-008-3 document. The possible violation was confirmed by WECC auditors during the audit.

Root Cause:

A4B3C08: Job scoping did not identify special circumstances and/or conditions - The initial planning as FAC-009-1 was going into effect did not correctly identify the scope of work to be completed. The planning did not identify the need to check all elements or at least a random sampling of elements to ensure that the Facility Ratings were correct and did not identify the need to organize the elements into a tool/database or similar to validate the published Facility Ratings.

Contributing Causes:

A3B1C07: Omission/repetition of steps based on assumptions for completion - An assumption was made that historical ratings used to populate the initial FAC-009-1 document were determined using the same methodology documented in the FRM. The details used in determining the historical ratings can be difficult to locate in order to confirm the historical ratings. A random sampling of the line ratings should have been considered to verify the ratings of all of the elements included as part of the sampled lines against the WAPA FRM. The need to access or review the historical ratings occurred infrequently, therefore the difficulty in locating the details associated with the historical ratings was not previously identified as an area of concern that could have triggered the decision to do a random sampling to verify the details included in the calculations.

A3B2C04: Previous successes in use of rule reinforced continued use of rule - No issues were previously identified with historical ratings so the assumption that the historical ratings were correct continued to be applied.

Relevant information regarding the identification of the violation(s):

WAPA-RMR discovered while validating some of the published Facility Ratings in the FAC-008-3 document that the Facility Rating Methodology did not rate all substation cable conductors the same as line conductors. This led WAPA-RMR to begin work to make a closer examination of all terminal equipment for all lines in the FAC-008-3 document. In the process of this validation procedure, the possible violation was found. This possible violation was found after the Notice of Audit for 2018 was issued to WAPA-RMR.

Plan Details

Identify and describe the action plan, including specific tasks and actions that your organization is proposing to undertake, or which it undertook if this Mitigation Plan has been completed, to correct the violation(s) identified above in Section C.1 of this form:

WAPA-RMR will examine the full FAC-008-3 list that was provided for the 2018 Audit. Those Facilities that are not required (as per the purpose statement in FAC-008-3) will be removed from the list. WAPA-RMR Transmission Planning - North will continue their validation process. During this process, all elements and available documentation for the elements will be examined. Those elements with sufficient documentation will be given a provisional rating. Those elements without sufficient documentation that are WAPA owned will be field verified and a provisional rating provided. A request will be made to those owners/operators of equipment not owned by WAPA or not within WAPA's control to provide ratings for those elements, or overall ratings for terminal equipment.

WAPA-RMR will examine if peer validated engineering expertise can be used to mitigate some of the violations through modification of the Facility Ratings Methodology. For those Facilities still not meeting the published ratings, two options will be used to mitigate the violation. One option is to upgrade the equipment that is part of the Facility that would otherwise limit the rating. The second option is to accept the reduction in rating due to the limiting element(s).

Provide the timetable for completion of the Mitigation Plan, including the completion date by which the Mitigation Plan will be fully implemented and the violations associated with this Mitigation Plan are corrected:

Proposed Completion date of Mitigation Plan: December 15, 2020

Milestone Activities, with completion dates, that your organization is proposing for this Mitigation Plan:

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date	Entity Comment on Milestone Completion	Extension Request Pending
J7100 Research	Complete the documentation review of the FAC-008-3 list that was provided for the 2018 Audit of RMR.	02/15/2019	02/15/2019	Please refer to the attached file "WAPA-RMR FAC-008-3 MP Item 1 Evidence.pdf", which shows on PDF page 3 that we have completed our review of the Facilities included in the FAC-008-3 lists provided in the 2018 Audit of RMR. PDF page 2 provides a brief explanation of the Tabs/sections included in the evidence submittal.	No
Timeline for Ratings Verifications	Determine the scope and schedule to complete the field and third party verifications. This includes field	03/29/2019	03/28/2019	Please refer to the attached file "WAPA-RMR FAC-008-3 MP Timeline for Verifications Evidence Final.pdf", which shows on PDF page 3 under the Milestone	No

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date	Entity Comment on Milestone Completion	Extension Request Pending
	verification for those elements without sufficient documentation that are WAPA owned, and obtaining ratings for those elements, or overall ratings for terminal equipment from those owners/operators of equipment that is not owned by WAPA or not within WAPA's control to provide ratings for those elements, or terminal equipment.			Activity "Timeline for Ratings Verifications" that we have completed our work to determine the scope and schedule to complete field and third party verifications as of 3/28/19. PDF page 2 provides a brief explanation of the Tabs/sections included in this evidence submittal. This activity required for each transmission line or transformer remaining on the FAC-008-3 List that was missing a Researched Rating, a date had to be defined to complete the field and third party verifications. These dates are listed in the Column titled "Due Date for Verif." starting on PDF page 7.	
Item 3: Updated MP Tasks	Submit the updated mitigation plan tasks after the completion of the Timeline for Ratings Verification.	04/19/2019	04/18/2019	Please refer to the following attached files "EXTERNAL Mitigation Plan Submitted by WAPA - RMR - FAC-009-1 R1 - WECC2018020399 V2 - CONFIDENTIAL NON-PUBLIC.pdf", and "FAC-008-3 R6 CDMS_MitPlan_submitted 190418.pdf". The first file is PDF of the email from webCDMS that documents the submission of the Mitigation Plan Version 2. The second file is a PDF generated from webCDMS of the Version 2 Mitigation Plan that was submitted 4/18/19.	No
Form CAP Group	Define the group that will create the	04/30/2019	04/29/2019	Please refer to the following attached files "RE_	No

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date	Entity Comment on Milestone Completion	Extension Request Pending
	Corrective Action Plans (CAP's)			Equipment Rating Change Control Team Integration.pdf" and "RMR Rating Control Stakeholder List.pdf". The first file is PDF of the email distributing the RMR Rating Control Stakeholder List. This represents the formation of the CAP Group. This list was originally distributed on 4/29/19, with an updated copy sent out on 4/30/19 after it was noticed the original list was missing a date and version number. The second file lists the CAP Group/Charter Group.	
Define CAP processes	Determine the processes that will be used to identify a proposed CAP for each Facility where the provisional rating does not meet the published rating, evaluate the proposed CAP for potential impacts to the reliability of the BES and other Reliability Standards, achieve consensus on each proposed CAP so the selected CAP can move to the execution phase.	05/31/2019			No
Provide JUN 2019 FAC-008 project status report	Provide bi-monthly FAC-008 project status reports to WECC (Starting 6/30/2019 and continuing thru 10/31/2020). These project status reports should be submitted	06/30/2019			No

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date	Entity Comment on Milestone Completion	Extension Request Pending
	within two weeks after the end of the reporting period.				
Update Manage Facility Ratings processes	Update/Define the processes that will be used going forward to "Manage Facility Ratings" when an element gets changed associated with a Facility.	07/31/2019			No
Provide AUG 2019 FAC-008 project status report	Provide bi-monthly FAC-008 project status reports to WECC (Starting 6/30/2019 and continuing thru 10/31/2020). These project status reports should be submitted within two weeks after the end of the reporting period.	08/31/2019			No
Provide OCT 2019 FAC-008 project status report	Provide bi-monthly FAC-008 project status reports to WECC (Starting 6/30/2019 and continuing thru 10/31/2020). These project status reports should be submitted within two weeks after the end of the reporting period.	10/31/2019			No
Provide training	Provide training associated with the processes to "Manage Facility Ratings"	10/31/2019			No
Provide DEC 2019 FAC-008 project status report	Provide bi-monthly FAC-008 project status reports to WECC (Starting 6/30/2019 and continuing thru	12/31/2019			No

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date	Entity Comment on Milestone Completion	Extension Request Pending
	10/31/2020). These project status reports should be submitted within two weeks after the end of the reporting period.				
Provide FEB 2020 FAC-008 project status report	Provide bi-monthly FAC-008 project status reports to WECC (Starting 6/30/2019 and continuing thru 10/31/2020). These project status reports should be submitted within two weeks after the end of the reporting period.	02/29/2020			No
Received Verifications	Complete field and third party verifications so that provisional ratings can be provided and determine if they meet the published rating for those Facilities.	03/26/2020			No
Provide APR 2020 FAC-008 project status report	Provide bi-monthly FAC-008 project status reports to WECC (Starting 6/30/2019 and continuing thru 10/31/2020). These project status reports should be submitted within two weeks after the end of the reporting period.	04/30/2020			No
Provide JUN 2020 FAC-008 project status report	Provide bi-monthly FAC-008 project status reports to WECC (Starting 6/30/2019 and continuing thru 10/31/2020). These	06/30/2020			No

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date	Entity Comment on Milestone Completion	Extension Request Pending
	project status reports should be submitted within two weeks after the end of the reporting period.				
Create CAP	<p>Determine Corrective Action Plans (CAP) to be executed for each Facility where the provisional rating does not meet the published rating. This work includes the following tasks for each of these Facilities:</p> <p>a. Identify a proposed CAP for each Facility where the provisional rating does not meet the published rating. This step is performed by Transmission Planning and is already underway for Facilities where the ratings don't match.</p> <p>b. Kick off the CAP Group to start the process to evaluate proposed CAP's and select a CAP for each Facility to move to the execution phase. This will be completed during the first couple weeks of June 2019.</p> <p>c. Evaluate the proposed CAP for potential impacts to the reliability of the BES and other Reliability Standards.</p> <p>d. Achieve consensus with all impacted</p>	08/23/2020			No

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date	Entity Comment on Milestone Completion	Extension Request Pending
	<p>stakeholders for each proposed CAP so the selected CAP can move to the execution phase for the associated Facility.</p> <p>e. The intermediary targets to complete 100% of this work by 8/23/2020 are: 25% complete by 11/27/2019; 50% complete by 2/25/2020; 75% completed by 5/25/2020; and 100% complete by 8/23/2020. This work cannot be completed for all Facilities until after the Received Verifications Milestone Activity has been completed which has a Proposed Completion Date of 3/26/2020.</p>				
Provide AUG 2020 FAC-008 project status report	Provide bi-monthly FAC-008 project status reports to WECC (Starting 6/30/2019 and continuing thru 10/31/2020). These project status reports should be submitted within two weeks after the end of the reporting period.	08/31/2020			No
Provide OCT 2020 FAC-008 project status report	Provide bi-monthly FAC-008 project status reports to WECC (Starting	10/31/2020			No

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date	Entity Comment on Milestone Completion	Extension Request Pending
	6/30/2019 and continuing thru 10/31/2020). These project status reports should be submitted within two weeks after the end of the reporting period.				
Executed CAP and Ratings Match	Execute the Corrective Action Plan (CAP) for each Facility as defined in the Create CAP Milestone Activity resulting in the Published and Provisional/Research ed Facility Ratings matching. The work to execute each CAP includes: a. Follow the existing processes to send out the revised FAC-008 document, and submit the appropriate changes to WECC for inclusion in the WECC base case models b. Transmission Planning will run updated TPL assessments with revised ratings and develop new MOD-029 studies for Total Transfer Capability (TTC) changes, etc. (Evidence will not be provided for completion of this activity as part of this mitigation plan) c. Operations will update real time	12/15/2020			No

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date	Entity Comment on Milestone Completion	Extension Request Pending
	<p>study ratings and conduct N-1 studies and also update SOLs (Evidence will not be provided for completion of this activity as part of this mitigation plan)</p> <p>d. SCADA will review Level 1 and 2 alarms associated with revised FAC-008 document (Evidence will not be provided for completion of this activity as part of this mitigation plan)</p> <p>e. Protection will review protection schemes associated with the revised FAC-008 document (Evidence will not be provided for completion of this activity as part of this mitigation plan)</p> <p>f. The intermediary targets to complete 100% of this work by 12/15/2020 are: 25% complete by 3/30/2020; 50% complete by 6/30/2020; 75% completed by 9/30/2020; and 100% complete by 12/15/2020. This work cannot be completed for all Facilities until after the Create CAP Milestone Activity has been completed which has a Proposed</p>				

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date	Entity Comment on Milestone Completion	Extension Request Pending
	Completion Date of 8/23/2020.				

Additional Relevant Information

Reliability Risk

Reliability Risk

While the Mitigation Plan is being implemented, the reliability of the bulk Power System may remain at higher Risk or be otherwise negatively impacted until the plan is successfully completed. To the extent they are known or anticipated : (i) Identify any such risks or impacts, and; (ii) discuss any actions planned or proposed to address these risks or impacts.

Existing data on line loadings was examined. The data shows that highest line loadings tend to be 50% of the published ratings. The rating of the most limiting elements has been higher than the historical/actual line loadings.

Transmission planning studies, including those for NERC Standard TPL-001-4 have identified system violations with the existing ratings and Corrective Action Plans have been developed for those Facilities.

As such, the risk to the reliability of the Bulk Power System is minimal and the reliability of the Bulk Power System should not be negatively impacted prior to the successful completion of the mitigation plan.

Prevention

Describe how successful completion of this plan will prevent or minimize the probability further violations of the same or similar reliability standards requirements will occur

Successful completion of this mitigation plan will result in complete records of the element/equipment that makes up each Facility in the Facility Ratings document. When notified through the existing notification process, the update of these documents will be used to update the FAC-008-3 documentation. This will minimize the probability of further violations.

Describe any action that may be taken or planned beyond that listed in the mitigation plan, to prevent or minimize the probability of incurring further violations of the same or similar standards requirements

WAPA-RMR Transmission Planning - North will continue to update its software that tracks the field modification of existing equipment. WAPA-RMR Transmission Planning - North will continue to participate in the Planning Coordination meetings and has begun meeting with Maintenance Personnel to keep in touch with ongoing and planned maintenance work that affects the Facility Ratings.

Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

- * Submits the Mitigation Plan, as presented, to the regional entity for acceptance and approval by NERC, and
- * if applicable, certifies that the Mitigation Plan, as presented, was completed as specified.

Acknowledges:

1. I am qualified to sign this mitigation plan on behalf of my organization.
2. I have read and understand the obligations to comply with the mitigation plan requirements and ERO remedial action directives as well as ERO documents, including but not limited to, the NERC rules of procedure and the application NERC CMEP.
3. I have read and am familiar with the contents of the foregoing Mitigation Plan.

Western Area Power Administration - Rocky Mountain Region Agrees to be bound by, and comply with, Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authority.

Authorized Individual Signature: _____
(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Christian D. Johnson

Title: Reliability Compliance Manager

Authorized On: February 13, 2019