

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

STAFF NOTICE OF ALLEGED VIOLATIONS

(January 25, 2011)

Take notice¹ that in a nonpublic preliminary investigation pursuant to 18 CFR Part 1b, the staff of the Office of Enforcement of the Federal Energy Regulatory Commission (Commission) has preliminarily determined that Grand River Dam Authority (GRDA) violated multiple Reliability Standards approved by the Commission.²

GRDA is a public power agency based in Vinita, Oklahoma that operates hydroelectric and thermal generation facilities and a transmission system located within the Southwest Power Pool (SPP) transmission footprint. Staff alleges that GRDA violated fifty-two Requirements of nineteen Reliability Standards by failing to adequately perform critical functions required for reliable operation of transmission systems, summarized as follows:

- Staff alleges violations of Requirements in TOP-002-2a TOP-004-2, TOP-006-2 and TOP-008-1 for staff's findings of failure to perform operational studies; to study the system condition of a significant portion of its protection system communications devices in a dysfunctional state and notify its Reliability Coordinator of that condition; to use tools with a metering range suitable for monitoring its system; and to be prepared for circumstances in which transmission system equipment exceeds its operating limits.
- Staff alleges violations of multiple Requirements in COM-001-1.1 because staff found GRDA's communications network architecture did not provide adequate and reliable telecommunications before February of 2009; its current network architecture continues to have critical single points of failure undermining adequate and reliable telecommunications; GRDA did not actively monitor vital telecommunications facilities for several months; and GRDA did not have adequate written procedures for continuing operations in the event of loss of telecommunications facilities.

¹ *Enforcement of Statutes, Regulations, and Orders*, 129 FERC ¶ 61,247 (2009), *order on reh'g*, 134 FERC ¶ 61,054 (2011).

² *Mandatory Reliability Standards for the Bulk-Power System*, Order No. 693, FERC Stats. & Regs. ¶ 31,242, *order on reh'g*, Order No. 693-A, 120 FERC ¶ 61,053 (2007).

- Staff alleges violations of all Requirements of EOP-008-0 because it found that GRDA did not have a complete or viable plan for continued operations in the event of loss of functionality of its primary control center.
- Staff alleges that GRDA failed to report a system disturbance to NERC as required by EOP-004-1, Requirement R3.
- Staff alleges that GRDA failed to have and implement a facility ratings methodology and facility interconnection requirements pursuant to Requirements of FAC-008-1, FAC-009-1 and FAC-001-1.
- Staff alleges that GRDA did not perform long term planning studies of its transmission system consistent with the Requirements of TPL-001-0.1, TPL-002-0a, TPL-003-0a and TPL-004-0.
- Staff alleges that GRDA violated several Requirements of PRC-001-1, PRC-004-1, PRC-005-1 and PRC-018-1 because, staff found, it did not understand the purpose and limitations of its protection systems as affected by the system condition of a significant portion of its protection system communications devices in a dysfunctional state and did not notify its neighboring transmission operators and balancing authorities of the same; did not perform analysis and corrective action of protection system misoperations; did not maintain a protection system maintenance and testing program and documentation consistently for all protections system devices on its system; and did not install disturbance monitoring equipment required for certain locations.
- Staff alleges GRDA violated Requirements of PER-002-0 because its system operator training program had gaps and GRDA did not identify appropriately competent training staff for its operator training program.

Staff alleges that most of these violations occurred from June 2007, when the Reliability Standards became mandatory and enforceable, until May 2010. GRDA effectively addressed certain violations before May 2010, and as early as August 2009, and certain other violations remain ongoing.

This Notice does not confer a right on third parties to intervene in the investigation or any other right with respect to the investigation.

Kimberly D. Bose,
Secretary.

Document Content(s)

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