

September 28, 2023

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 the Avangrid Companies,
FERC Docket No. NP23-_-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Notice of Penalty¹ regarding New York State Electric & Gas Corporation (NYSEG), Rochester Gas and Electric Corporation (RG&E), Central Maine Power Company (CMP), Maine Electric Power Company (MEPCO), and United Illuminated Company (UI) (collectively, “Avangrid”) and referred to herein as the Entity, NERC Registry ID# NCR07181, NCR07207, NCR07029, NCR07134, and NCR07222,² 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)).³

NERC is filing this Notice of Penalty, with information and details regarding the nature and resolution of the violations,⁴ with the Commission because the Northeast Power Coordinating Council, Inc. (NPCC) and the Entity have entered into a Settlement Agreement to resolve all outstanding issues arising from

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 The Entity was included on the NERC Compliance Registry as follows: NCR07029 (Distribution Provider (DP), Transmission Owner (TO), Transmission Operator (TOP), Transmission Planner (TP), and Transmission Service Provider (TSP) on June 21, 2007); NCR07134 (TO and TP on June 21, 2007); NCR07181 (DP and TO on June 21, 2007 and TOP and TP on July 1, 2016); NCR07207 (DP and TO on June 21, 2007 and TP on July 1, 2016); and NCR0722 (DP, TO, and TP on June 21, 2007 and TSP on April 8, 2013).

³ See 18 C.F.R § 39.7(c)(2) and 18 C.F.R § 39.7(d).

⁴ 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.

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NPCC’s determination and findings of the violations of the Operations and Planning Reliability Standards listed below.

According to the Settlement Agreement, the Entity admits the violations, and has agreed to the assessed penalty of six hundred fifteen thousand dollars (\$615,000), in addition to other actions to mitigate the instant violations and facilitate future compliance under the terms and conditions of the Settlement Agreement.

Statement of Findings Underlying the Violations

This Notice of Penalty incorporates the findings and justifications set forth in the Settlement Agreement, by and between NPCC and the Entity. The details of the findings and basis for the penalty are set forth in the Settlement Agreement and herein.

In accordance with Section 39.7 of the Commission’s regulations, 18 C.F.R. § 39.7 (2023), NERC provides the following summary table identifying each violation of a Reliability Standard resolved by the Settlement Agreement. Further information on the subject violations is set forth in the Settlement Agreement and herein.

Violation(s) Determined and Discovery Method								
<i>*SR = Self-Report / SC = Self-Certification / CA = Compliance Audit / SPC = Spot Check / CI = Compliance Investigation</i>								
NERC Violation ID	Standard	Req.	VRF/VSL	Applicable Function(s)	Discovery Method* & Date	Violation Start-End Date	Risk	Penalty Amount
NPCC2020022875	FAC-008-3	R6	Medium/ High	TO	SR 2/5/20	1/1/2012 to 7/15/2019	Serious	\$615K
NPCC2020024015	FAC-009-1	R1	Medium/ Lower	TO	SR 10/5/20	6/21/2007 to 10/15/2020	Moderate	
NPCC2020024220	FAC-008-3	R6	Medium/ Lower	TO	SR 11/13/20	6/21/2007 to 8/18/2022	Moderate	
NPCC2020024361	FAC-008-3	R6	Medium/ Moderate	TO	SR 12/23/20	6/21/2007 to 12/31/2020	Serious	
2022-01674	FAC-008-5	R6	Medium/ Severe	TO	SR 11/14/22	6/21/2007 to 6/30/2024	Serious	
2022-01675	FAC-008-5	R6	Medium/ Severe	TO	SR 11/14/22	6/21/2007 to 6/30/2024	Moderate	
2023-00565	FAC-008-5	R6	Medium/ Lower	TO	SR 4/5/23	6/21/2007 to 12/31/2024	Moderate	

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Information About the Entities

Avangrid is headquartered in Orange, CT, and has a footprint in 24 states with \$41 billion in assets. Its primary businesses are Networks (including NYSEG, RG&E, CMP, MEPCO, and UI) that serve 3.3 million electric and natural gas customers in the Northeast, and Renewables, the third-largest renewable energy company in the U.S. with a diverse onshore and offshore renewable energy portfolio. NYSEG, RG&E, CMP, MEPCO, and UI are subsidiaries of Avangrid.

NYSEG operates approximately 35,000 miles of electric distribution lines and 4,500 miles of electric transmission lines across more than 40% of upstate New York. It serves approximately 907,000 electricity customers.

RG&E operates approximately 8,900 miles of electric distribution lines and 1,100 miles of electric transmission lines. It serves approximately 385,900 electricity customers in a nine-county region in New York surrounding the City of Rochester.

CMP is Maine's largest electricity transmission and distribution utility. CMP operates approximately 23,500 miles of distribution lines and 2,900 miles of transmission lines. CMP serves approximately 646,000 customers across 346 communities in central and southern Maine.

MEPCO is partially owned by CMP, which has a 78% ownership interest. MEPCO owns and operates a 345kV transmission interconnection extending from Wiscasset, Maine to the Maine-New Brunswick international border at Orient, Maine, where it interconnects with the New Brunswick Power Corporation's facilities in the province of New Brunswick, Canada.

UI operates approximately 3,600 miles of electric distribution lines and 138 miles of transmission lines. UI serves approximately 341,000 customers in the greater New Haven and Bridgeport areas of Connecticut.

Executive Summary

The Settlement Agreement resolves seven violations of Facilities Design, Connections, and Maintenance (FAC) Reliability Standards, specifically FAC-009-1 R1, FAC-008-3 R6, and FAC-008-5 R6, three of which NPCC determined posed a serious risk and four of which NPCC determined posed a moderate risk to the reliability of the Bulk Power System (BPS).

In total, Avangrid discovered errors at 119 out of their 704 total Facilities (17%), with 54 Facilities (7.7%) requiring a rating decrease ranging from 2% to 70%. Additionally, none of the derates resulted in Avangrid operating above the correct Facility Rating over the past three years. The violations are indicative of a long-standing, systemic issue with Facility Ratings and include instances that (a) were

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identified through an extent of condition conducted by Avangrid following discovery of its first Facility Rating discrepancy impacting one line, which included full field walkdowns; and (b) an ongoing extent of condition (EOC) review that will be completed by the end of 2024, including full field walkdowns of all Avangrid Facilities.⁵ Upon completion of the EOC walkdowns, Avangrid will provide evidence to support the completion to NPCC and NPCC will verify completion and report it to NERC. Additionally, Avangrid will submit monthly reports to NPCC through the end of 2024, disclosing Facility Ratings discrepancies, if any additional discrepancies are identified.

Avangrid performed an EOC review and found numerous instances of inaccurate Facility Ratings, but none of the derates involved resulted in Avangrid operating above the correct Facility Rating over the past three years. The issue resulted in 41 NYSEG Facilities (5.6% of Avangrid Facilities), 2 RG&E Facilities (0.3% of Avangrid Facilities), 72 CMP Facilities (10.2% of Avangrid Facilities), 4 MEPCO Facilities (0.6% of Avangrid Facilities), and no UI Facilities requiring a Facility Rating change. Of these, 14 NYSEG Facilities and 40 CMP Facilities required a decrease ranging from 2% - 70%. Avangrid expects to complete its EOC walkdowns of all its Facilities by the end of 2024. While no Facility Ratings inaccuracies were identified for UI, UI was unable to locate engineering documentation to support some Facility Ratings and there was not a clear identification as to what version of the Facility Rating Methodology UI had used.

FAC-008-3 R6 – Violation ID NPCC2020022875 (NYSEG)

NPCC determined that NYSEG did not maintain accurate Facility Ratings that were consistent with its associated Facility Ratings Methodology.

The cause of this violation was (1) ineffective interdepartmental coordination or silos between departments; (2) inadequate internal controls for ensuring the accuracy of Facility Ratings; (3) lack of Company-wide rating modification process; and (4) inadequate ratings validation program, including but not limited to a process of reviewing equipment ratings during the transition from a manually maintained database to the current thermal limit database software.

NPCC determined that the violation posed a serious risk to the reliability of the BPS. Attachment 1 includes the facts regarding the violation that NPCC considered in its risk assessment.

The Entity submitted its mitigating activities to address the referenced violation, with an expected completion date of December 31, 2024. Attachment 1 includes a description of the mitigation activities

⁵ As of as of September 20, 2023, the status of the full walkdown of Avangrid facilities was as follows: NYSEG - 90% complete; RG&E - 30% complete; CMP - 95% complete; MEPCO - 60% complete; UI - 10% complete.

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the Entity took and is planning to take to address this violation. Once the Entity certifies completion of the mitigating activities, NPCC will verify completion of the mitigating activities and inform NERC.

FAC-009-1 R1 – Violation ID NPCC2020024015 (RG&E)

NPCC determined that RG&E did not maintain accurate Facility Ratings that were consistent with its associated Facility Ratings Methodology.

The cause of this violation was (1) ineffective interdepartmental coordination or silos between departments; (2) inadequate internal controls for ensuring the accuracy of Facility Ratings; (3) lack of Company-wide rating modification process; and (4) inadequate ratings validation program, including but not limited to a process of reviewing equipment ratings during the transition from a manually maintained database to the current thermal limit database software.

NPCC determined that the violation posed a moderate risk to the reliability of the BPS. Attachment 1 includes the facts regarding the violation that NPCC considered in its risk assessment.

The Entity submitted its mitigating activities to address the referenced violation, with an expected completion date of December 31, 2024. Attachment 1 includes a description of the mitigation activities the Entity took and is planning to take to address this violation. Once the Entity certifies completion of the mitigating activities, NPCC will verify completion of the mitigating activities and inform NERC.

FAC-008-3 R6 – Violation ID NPCC2020024220 (RG&E)

NPCC determined that RG&E did not maintain accurate Facility Ratings that were consistent with its associated Facility Ratings Methodology.

The cause of this violation was (1) ineffective interdepartmental coordination or silos between departments; (2) inadequate internal controls for ensuring the accuracy of Facility Ratings; (3) lack of Company-wide rating modification process; and (4) inadequate ratings validation program, including but not limited to a process of reviewing equipment ratings during the transition from a manually maintained database to the current thermal limit database software.

NPCC determined that the violation posed a moderate risk to the reliability of the BPS. Attachment 1 includes the facts regarding the violation that NPCC considered in its risk assessment.

The Entity submitted its mitigating activities to address the referenced violation, with an expected completion date of December 31, 2024. Attachment 1 includes a description of the mitigation activities

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the Entity took and is planning to take to address this violation. Once the Entity certifies completion of the mitigating activities, NPCC will verify completion of the mitigating activities and inform NERC.

FAC-008-3 R6 – Violation ID NPCC2020024361 (NYSEG)

NPCC determined that NYSEG did not maintain accurate Facility Ratings that were consistent with its associated Facility Ratings Methodology.

The cause of this violation was (1) ineffective interdepartmental coordination or silos between departments; (2) inadequate internal controls for ensuring the accuracy of Facility Ratings; (3) lack of Company-wide rating modification process; and (4) inadequate ratings validation program, including but not limited to a process of reviewing equipment ratings during the transition from a manually maintained database to the current thermal limit database software.

NPCC determined that the violation posed a serious risk to the reliability of the BPS. Attachment 1 includes the facts regarding the violation that NPCC considered in its risk assessments.

The Entity submitted its mitigating activities to address the referenced violation, with an expected completion date of December 31, 2024. Attachment 1 includes a description of the mitigation activities the Entity took and is planning to take to address this violation. Once the Entity certifies completion of the mitigating activities, NPCC will verify completion of the mitigating activities and inform NERC.

FAC-008-5 R6 – Violation IDs 2022-01674 (CMP)

NPCC determined that CMP did not maintain accurate Facility Ratings that were consistent with its associated Facility Ratings Methodology.

The cause of this violation was (1) ineffective interdepartmental coordination or silos between departments; (2) inadequate internal controls for ensuring the accuracy of Facility Ratings; (3) lack of Company-wide rating modification process; and (4) inadequate ratings validation program, including but not limited to a process of reviewing equipment ratings during the transition from a manually maintained database to the current thermal limit database software.

NPCC determined that the violation posed a serious risk to the reliability of the BPS. Attachment 1 includes the facts regarding the violation that NPCC considered in its risk assessment.

The Entity submitted its mitigating activities to address the referenced violation, with an expected completion date of December 31, 2024. Attachment 1 includes a description of the mitigation activities

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the Entity took and is planning to take to address this violation. Once the Entity certifies completion of the mitigating activities, NPCC will verify completion of the mitigating activities and inform NERC.

FAC-008-5 R6 – Violation IDs 2022-01675 (MEPCO)

NPCC determined that MEPCO did not maintain accurate Facility Ratings that were consistent with its associated Facility Ratings Methodology.

The cause of this violation was (1) ineffective interdepartmental coordination or silos between departments; (2) inadequate internal controls for ensuring the accuracy of Facility Ratings; (3) lack of Company-wide rating modification process; and (4) inadequate ratings validation program, including but not limited to a process of reviewing equipment ratings during the transition from a manually maintained database to the current thermal limit database software.

NPCC determined that the violation posed a moderate risk to the reliability of the BPS. Attachment 1 includes the facts regarding the violation that NPCC considered in its risk assessment.

The Entity submitted its Mitigating Activities to address the referenced violation, with an expected completion date of December 31, 2024. Attachment 1 includes a description of the mitigation activities the Entity took and is planning to take to address this violation. Once the Entity certifies completion of the mitigating activities, NPCC will verify completion of the mitigating activities and inform NERC.

FAC-008-5 R6 – Violation ID 2023-00565 (UI)

NPCC determined that UI did not maintain documentation to support some Facility Ratings and did not clearly identify what version of the Facility Rating Methodology the Entity used.

The cause of this violation was (1) ineffective interdepartmental coordination or silos between departments; (2) inadequate internal controls for ensuring the accuracy of Facility Ratings; (3) lack of Company-wide rating modification process; and (4) inadequate ratings validation program, including but not limited to a process of reviewing equipment ratings during the transition from a manually maintained database to the current thermal limit database software.

NPCC determined that the violation posed a moderate risk to the reliability of the BPS. Attachment 1 includes the facts regarding the violation that NPCC considered in its risk assessment.

The Entity submitted its Mitigating Activities to address the referenced violation, with an expected completion date of December 31, 2024. Attachment 1 includes a description of the mitigation activities

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the Entity took and is planning to take to address this violation. Once the Entity certifies completion of the mitigating activities, NPCC will verify completion of the mitigating activities and inform NERC.

Regional Entity's Basis for Penalty

According to the Settlement Agreement, NPCC has assessed a penalty of six hundred fifteen thousand dollars (\$615,000) for the referenced violations. In reaching this determination, NPCC considered the following factors:

1. Three of the seven violations posed a serious risk to the reliability of the BPS, as discussed in Attachment 1;
2. The Entity self-reported all of the violations, but two did not warrant self-reporting credit as they were discovered due to the NPCC self-certification process, as discussed in Attachment 1;
3. The Entity was cooperative throughout the compliance enforcement process;
4. The Entity agreed to the settlement and admitted to the violations; and
5. There were no other mitigating or aggravating factors or extenuating circumstances that would affect the assessed penalty/disposition method.

After consideration of the above factors, NPCC determined that, in this instance, the penalty amount of six hundred fifteen thousand dollars (\$615,000) is appropriate and bears a reasonable relation to the seriousness and duration of the violations.

Statement Describing the Assessed Penalty, Sanction, or Enforcement Action Imposed⁶

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,⁷ NERC Enforcement staff reviewed the applicable requirements of the violations at issue, and considered the factors listed above.

⁶ See 18 C.F.R. § 39.7(d)(4).

⁷ 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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For the foregoing reasons, NERC Enforcement staff approved the resolution between NPCC and the Entity and believes that the assessed penalty of six hundred fifteen thousand dollars (\$615,000) is appropriate for the violations and circumstances at issue and is consistent with NERC's goal to promote and ensure reliability of the BPS.

Pursuant to 18 C.F.R. § 39.7(e), the penalty will be effective upon expiration of the 30-day period following the filing of this Notice of Penalty with FERC, or, if FERC decides to review the penalty, upon final determination by FERC.

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 NPCC and the Entity executed August 16, 2023, included as Attachment 1;
2. Record documents for the violation of FAC-008-3 R6 (NYSEG) (NPCC2020022875):
 - A. The Entity's Self-Report dated February 5, 2020, included as Attachment A to the Settlement Agreement
3. Record documents for the violation of FAC-008-3 R6 (RG&E) (NPCC2020024220):
 - B. The Entity's Self-Report dated November 13, 2020, included as Attachment B to the Settlement Agreement
4. Record documents for the violation of FAC-008-3 R6 (NYSEG) (NPCC2020024361):
 - C. The Entity's Self-Report dated December 23, 2020, included as Attachment C to the Settlement Agreement
5. Record documents for the violation of FAC-009-1 R1 (RG&E) (NPCC2020024015):
 - D. The Entity's Self-Report dated October 5, 2020, included as Attachment D to the Settlement Agreement
6. Record documents for the violation of FAC-008-5 R6 (CMP) (2022-01674):
 - E. The Entity's Self-Report dated November 14, 2022, included as Attachment E to the Settlement Agreement
7. Record documents for the violation of FAC-008-5 R6 (MEPCO) (2022-01675):
 - F. The Entity's Self-Report dated November 14, 2022, included as Attachment F to the Settlement Agreement

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8. Record documents for the violation of FAC-008-5 R6 (UI) (2023-00565):

G. The Entity's Self-Report dated April 5, 2023, included as Attachment G to the Settlement Agreement

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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>Teresina Stasko* Assistant General Counsel and Director of Enforcement North American Electric Reliability Corporation 1401 H Street NW, Suite 410 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile teresina.stasko@nerc.net</p>
<p>Catherine Stempien* President and Chief Executive Officer, Avangrid Networks, Inc. 180 Marsh Hill Road Orange, CT 06477 catherine.stempien@avangrid.com</p>	<p>James McGrane* Senior Counsel North American Electric Reliability Corporation 1401 H Street NW, Suite 410 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile james.mcgrane@nerc.net</p>
<p>Thiago Bigi* Senior Vice President, Avangrid Networks 180 Marsh Hill Road Orange, CT 06477 thiago.bigi@avangrid.com</p>	<p>Amy Engstrom* Associate Counsel North American Electric Reliability Corporation 1401 H Street NW, Suite 410 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile amy.engstrom@nerc.net</p>
<p>Jennifer Pearce* Vice President, Reliability Assurance & Emergency Preparedness, Avangrid 162 Canco Road Portland, ME 04103 jennifer.pearce@avangrid.com</p>	
<p>John Allen* Senior Director – Physical Security and NERC Compliance, Avangrid 89 East Avenue Rochester, NY 14649 john.allen@avangrid.com</p>	

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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/ Amy Engstrom

James McGrane
Senior Counsel
Amy Engstrom
Associate Counsel
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cc: Avangrid
NPCC

Attachments

ATTACHMENT 1
Settlement Agreement by and between
Northeast Power Coordinating Council, Inc. and Avangrid Networks, Inc.
executed August 16, 2023

In re:

NERC Registry ID No. NCR07181,
NCR07207, NCR07029, NCR07134,
NCR07222

) **Violation ID Nos.:**

)

) NPCC2020022875 (FAC-008-3 R6)

) NPCC2020024015 (FAC-009-1 R1)

) NPCC2020024220 (FAC-008-3 R6)

) NPCC2020024361 (FAC-008-3 R6)

) NPCC2022-01674 (FAC-008-5 R6)

) NPCC2022-01675 (FAC-008-5 R6)

) NPCC2023-00565 (FAC-008-5 R6)

**SETTLEMENT AGREEMENT
OF
NORTHEAST POWER COORDINATING COUNCIL, INC.
AND
NEW YORK STATE ELECTRIC & GAS CORPORATION
AND
ROCHESTER GAS AND ELECTRIC CORPORATION
AND
CENTRAL MAINE POWER COMPANY
AND
MAINE ELECTRIC POWER COMPANY
AND
THE UNITED ILLUMINATING COMPANY**

I. INTRODUCTION

1. Northeast Power Coordinating Council, Inc. (“NPCC”) and New York State Electric & Gas Corporation (“NYSEG”), Rochester Gas and Electric Corporation (“RG&E”), Central Maine Power Company (“CMP”), Maine Electric Power Company (“MEPCO”), and the United Illuminating Company (“UI”), subsidiaries of Avangrid Networks, Inc.,¹ (collectively, the “Parties”) enter into this Settlement Agreement (“Agreement”) to resolve violations by Avangrid of the above-captioned Reliability Standards and Requirements.
2. The Parties stipulate to the facts in this Agreement for the sole purpose of resolving the violations. NYSEG, RG&E, CMP, MEPCO, and UI admit that these facts constitute violations of the above-captioned Reliability Standards and Requirements and takes responsibility for the noncompliance.

¹ NYSEG, RG&E, CMP, MEPCO, and UI (collectively, “Avangrid”).

II. NYSEG, RG&E, CMP, MEPCO and UI OVERVIEW

3. NYSEG is a subsidiary of Avangrid Networks, Inc. NYSEG operates approximately 35,000 miles of electric distribution lines and 4,500 miles of electric transmission lines across more than 40% of upstate New York. It serves approximately 907,000 electricity customers. NYSEG is registered on the NERC Compliance Registry as a Transmission Owner (“TO”). NYSEG, in its capacity as a TO, is subject to compliance with FAC-008-3 R6.
4. RG&E is a subsidiary of Avangrid Networks, Inc. RG&E operates approximately 8,900 miles of electric distribution lines and 1,100 miles of electric transmission lines. It serves approximately 385,900 electricity customers in a nine-county region in New York surrounding the City of Rochester. RG&E is registered on the NERC Compliance Registry as a TO. RG&E, in its capacity as a TO, is subject to compliance with FAC-008-3 R6 and, its prior version, FAC-009-1 R1.
5. CMP, a subsidiary of Avangrid Networks, Inc., is Maine’s largest electricity transmission and distribution utility. CMP operates approximately 23,500 miles of distribution lines and 2,900 miles of transmission lines. CMP serves approximately 646,000 customers across 346 communities in central and southern Maine. CMP is registered on the NERC Compliance Registry as a TO. CMP, in its capacity as a TO, is subject to compliance with FAC-008-5 R6.
6. MEPCO is partially owned by CMP, which has a 78% ownership interest. MEPCO owns and operates a 345kV transmission interconnection extending from Wiscasset, Maine to the Maine-New Brunswick international border at Orient, Maine, where it interconnects with the New Brunswick Power Corporation’s facilities in the province of New Brunswick, Canada. MEPCO is registered on the NERC Compliance Registry as a TO. MEPCO, in its capacity as a TO, is subject to compliance with FAC-008-5 R6.
7. UI is a subsidiary of Avangrid Networks, Inc. UI operates approximately 3,600 miles of electric distribution lines and 138 miles of transmission lines. UI serves approximately 341,000 customers in the greater New Haven and Bridgeport areas of Connecticut. UI is registered on the NERC Compliance Registry as a TO. UI, in its capacity as a TO, is subject to compliance with FAC-008-5 R6.

III. EXECUTIVE SUMMARY

8. This Agreement resolves seven violations of the Operations and Planning Reliability Standards, specifically FAC-008-3 R6, FAC-009-1 R1, and FAC-008-5 R6. Avangrid self-reported these violations, and NPCC recognizes that Avangrid identified most of the Facility Ratings issues comprising this Agreement through an extent of condition review Avangrid conducted following discovery of its first Facility Rating discrepancy impacting one line. NPCC further recognizes that MEPCO and UI’s Facility Ratings issues were discovered as a result of the NPCC Self-Certification process. These violations involve a wide-spread issue with the accuracy of Avangrid’s Facility Ratings across its footprint in the NPCC region. The duration and scope of the issues exacerbated the risk, as they evidenced a systemic issue. NPCC determined that three (3) of the violations posed a serious risk to the reliability of the

Bulk Power System (“BPS”), and four (4) of the violations posed a moderate risk to the reliability of the BPS. As discussed in more detail below, NPCC imposed a monetary penalty of \$615,000 for these violations.

9. As noted above, Avangrid first discovered these violations when NYSEG determined it had a Facility Ratings discrepancy impacting one line, and after discovery, Avangrid performed an extent of condition review. The violations involve several causes as follows: (1) ineffective interdepartmental coordination or silos between departments; (2) inadequate internal controls for ensuring the accuracy of Facility Ratings; (3) lack of Company-wide rating modification process; and (4) inadequate ratings validation program, including but not limited to a process of reviewing equipment ratings during the transition from a manually maintained database to the current thermal limit database software.
10. Avangrid’s mitigation is designed to better identify roles and responsibilities, improve coordination between departments, develop and implement cross-Operating Companies (“OpCo”) procedures to supersede individual OpCo procedures, and provide enhanced and repetitive training.
11. NPCC determined that a penalty is appropriate in this case because of the serious and moderate risks of the violations, which involved systemic issues.

IV. ADJUSTMENT FACTORS

12. In addition to the facts and circumstances detailed in Addendum A to this Agreement, NPCC considered the following factors in its penalty determination.

Compliance History

13. When assessing the penalty for the violations at issue in this Agreement, NPCC considered whether the facts of these violations constitute repetitive infractions and determined that Avangrid had no relevant prior noncompliance with FAC-008-3 R6, FAC-009-1 R1, or FAC-008-5 R6.

Cooperation

14. Avangrid has been cooperative throughout the entire enforcement process relating to these violations. Throughout the enforcement process, Avangrid provided requested information to NPCC that was detailed, organized, and thorough.

Self-Disclosure

15. Avangrid self-reported all seven violations in this Agreement. Effective oversight of the BPS reliability depends on Registered Entities self-reporting. As such, NPCC seeks to encourage self-reporting of violations and, therefore, is applying mitigating credit relating to the following violations: NPCC2020022875, NPCC2020024015, NPCC2020024220,

NPCC2020024361, and NPCC2022-01674. Although Avangrid self-reported all seven violations in this Agreement, NPCC recognizes that MEPCO and UI's Facility Ratings issues were discovered because of the NPCC Self-Certification process. Therefore, NPCC did not apply mitigating credit to the following violations: NPCC2022-01675 and NPCC2023-00565.

V. PENALTY

16. Based upon the foregoing, Avangrid shall pay a monetary penalty of \$615,000 to NPCC.
17. NPCC shall present an invoice to Avangrid after the Agreement is approved by the Federal Energy Regulatory Commission (the "Commission") or affirmed by operation of law. Upon receipt, Avangrid shall make a payment by the Required Date, which shall be 30 days from the receipt of the invoice. NPCC will notify NERC if it does not timely receive the payment from Avangrid.
18. If Avangrid does not remit the payment by the Required Date, interest payable to NPCC will begin to accrue pursuant to the Commission's regulations at 18 C.F.R. §35.19a(a)(2)(iii) from the date that payment is due and shall be payable in addition to the payment.

VI. ADDITIONAL TERMS

19. The Parties agree that this Agreement is in the best interest of BPS reliability. The terms and conditions of the Agreement are consistent with the regulations and orders of the Commission and the NERC Rules of Procedure.
20. NPCC shall report the terms of all settlements of compliance matters in the United States to NERC. NERC will review the Agreement for the purpose of evaluating its consistency with other settlements entered into for similar violations or under similar circumstances. Based on this review, NERC will either approve or reject this Agreement. If NERC rejects the Agreement, NERC will provide specific written reasons for such rejection and NPCC will attempt to negotiate with Avangrid a revised settlement agreement that addresses NERC's concerns. If a settlement cannot be reached, the enforcement process will continue to conclusion. If NERC approves the Agreement, NERC will (a) report the approved settlement to the Commission for review and approval by order or operation of law and (b) publicly post the violations and the terms provided for in this Agreement.
21. This Agreement binds the Parties upon execution and may only be altered or amended by written agreement executed by the Parties. Avangrid expressly waives its right to any hearing or appeal concerning any matter set forth herein, unless and only to the extent that Avangrid contends that any NERC or Commission action constitutes a material modification to this Agreement.
22. NPCC reserves all rights to initiate enforcement action against Avangrid in accordance with the NERC Rules of Procedure if Avangrid fails to comply with any of the terms or conditions of this Agreement. Avangrid retains all rights to defend against such action in accordance with the NERC Rules of Procedure.

23. Avangrid consents to NPCC's future use of this Agreement for the purpose of assessing the factors within the NERC Sanction Guidelines and applicable Commission orders and policy statements, including, but not limited to, the factor evaluating Avangrid's history of violations. Such use may be in any enforcement action or compliance proceeding undertaken by NERC or any Regional Entity or both, provided however that Avangrid does not consent to the use of the conclusions, determinations, and findings set forth in this Agreement as the sole basis for any other action or proceeding brought by NERC or any Regional Entity or both, nor does Avangrid consent to the use of this Agreement by any other party in any other action or proceeding.
24. Avangrid affirms that all the matters set forth in this Agreement are true and correct to the best of its knowledge, information, and belief, and that it understands that NPCC enters into this Agreement in express reliance on the representations contained herein, as well as any other representations or information provided by Avangrid to NPCC during any Avangrid interaction with NPCC relating to the subject matter of this Agreement.
25. Upon execution of this Agreement, the Parties stipulate that each possible violation addressed herein constitutes a violation as provided by Section 5.4 of the NERC Compliance Monitoring and Enforcement Program ("CMEP"). The Parties further stipulate that all required, applicable information listed in Section 5.3 of the CMEP is included within this Agreement.
26. Each of the undersigned agreeing to and accepting this Agreement warrants that he or she is an authorized representative of the Party designated below, is authorized to bind such Party, and accepts the Agreement on the Party's behalf.
27. The undersigned agreeing to and accepting this Agreement warrant that they enter into this Agreement voluntarily and that, other than the recitations set forth herein, no tender, offer, or promise of any kind by any member, employee, officer, director, agent, or representative of the Parties has been made to induce the signatories or any other party to enter into this Agreement.
28. This Agreement may be signed in counterparts.
29. This Agreement is executed in duplicate, each of which so executed shall be deemed to be an original.

[SIGNATURES ON FOLLOWING PAGE]²

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

²An electronic version of this executed document shall have the same force and effect as the original.

Agreed to and accepted:

Charles Dickerson
President & Chief Executive Officer
Northeast Power Coordinating Council, Inc.

Date



Catherine Stempien
President & Chief Executive Officer
Avangrid Networks, Inc.

08/15/2023

Date

Agreed to and accepted:

Charles Dickerson

Charles Dickerson
President & Chief Executive Officer
Northeast Power Coordinating Council, Inc.

August 16, 2023

Date

Catherine Stempien
President & Chief Executive Officer
Avangrid Networks, Inc.

Date

INTRODUCTION

1. The Facility Ratings violations identified in this Settlement Agreement stem from several causes as follows: (1) ineffective interdepartmental coordination or silos between departments; (2) inadequate internal controls for ensuring the accuracy of Facility Ratings; (3) lack of Company-wide rating modification process; and (4) inadequate ratings validation program, including but not limited to a process of reviewing equipment ratings during the transition from a manually maintained database to the current thermal limit database software.
2. Following an extent of condition review, Avangrid determined that NYSEG had inaccuracies in the ratings of 14% of its Facilities (41 out of 283 Facilities), RG&E had inaccuracies in the ratings of 2% of its Facilities (2 out of 96 Facilities), CMP had inaccuracies in the ratings of 31% of its Facilities (72 out of 229 Facilities), and MEPCO had inaccuracies in the ratings of 20% of its Facilities (4 out of 20 Facilities). Based on continuing mitigating actions, NPCC recognizes that Avangrid may identify additional Facility Rating inaccuracies. This noncompliance represents a wide-spread, systemic issue. Accordingly, NPCC determined that three (3) of the violations posed a serious risk to the reliability of the BPS, and four (4) of the violations posed a moderate risk to the reliability of the BPS.
3. Avangrid has completed the following mitigating actions:
 - a. Developed a comprehensive cross-OpCo Transmission Facility Ratings and Modeling Process.
 - b. Implemented a new Avangrid Facility Ratings Methodology Standard, which supersedes previous individual OpCo methodologies.
 - c. Created a centralized Rating and Modeling Group with five (5) additional FTEs.
 - d. Completed search for Plan & Profile drawings for NYSEG and RG&E transmission lines; conducted LIDAR on transmission lines with missing Plan & Profile drawings.
 - e. Designed a new database and repository in ProjectWise to control and track Facility Ratings information.
 - f. Conducted training and workshops on the new Facility Ratings process.
 - g. Procured engineering services to perform extent of conditions walkdowns and Facility Ratings verification.
4. Avangrid has committed to completing its extent of condition walkdowns by the end of 2024 at an estimated cost of \$7.5 million.
5. In addition to the mitigation described above, Avangrid agrees to continue to submit monthly status reports to NPCC identifying Facility Ratings discrepancies through the end of 2024.

I. VIOLATIONS

FAC-008-3 R6 (NPCC20200022875, NPCC2020024220, NPCC2020024661)

FAC-009-1 R1 (NPCC2020024015)

FAC-008-5 R6 (NPCC2022-01674, NPCC2022-01675, NPCC2023-00565)

6. Avangrid self-reported violations of FAC-008-3 R6, FAC-009-1 R1, and FAC-008-5 R6. Given that the text of FAC-008-3 R6 and its prior version, FAC-009-1 R1, and FAC-008-5 R6, which is currently in effect are similar enough that, in the interest of clarity, this Agreement will focus on the currently effective language in FAC-008-5 R6.
7. FAC-008-5 ensures 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.
8. FAC-008-5 states:

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.
9. A violation of FAC-008-5 R6 increases the potential for its Facilities to be operated in excess of their correct capacity rating, creating the opportunity for equipment damage, and incorrect determination of System Operating Limits for use in system planning and real-time operation.

Violation Descriptions and Risk Assessments

10. On February 5, 2020, NYSEG submitted a Self-Report (NPCC2020022875), to NPCC stating that, as a TO, it was potentially in violation of FAC-008-3 R6. The Self-Report identified Facility Rating discrepancies impacting one line. Specifically, the violation affected Line 960 from NYSEG's Hillside to Canton Avenue Station. NYSEG discovered that its current thermal limit database software application (TRAnalyzer) contained ratings for a 115 kV feeder that differed from those utilized by its system operators in the Energy Control Center and by the power flow software application (PSS/E) that is used to perform reliability studies. NYSEG determined that the line had multiple modifications from 1999 to 2019. Nevertheless, the impact of these modifications on the line's thermal ratings was not properly reflected into the rating

database. *See*, Self-Report Attachment A.³ The noncompliance began on January 1, 2012, when NYSEG replaced a breaker at Hillside and the thermal rating sheet for Line 960 was not correctly updated. The noncompliance ended on July 15, 2019, when NYSEG updated the Line 960 thermal rating sheet.

11. On November 13, 2020, RG&E submitted a Self-Report (NPCC2020024220) to NPCC stating that, as a TO, it was potentially in violation of FAC-008-3 R6. During an extent of condition review, RG&E discovered that the Plan & Profile drawings for 26 BES transmission lines could not be found in the applicable digital repository. *See*, Self-Report, Attachment B. The noncompliance began on June 21, 2007, the date RG&E was registered as a TO. The noncompliance ended on August, 18, 2022, when RG&E recreated the missing Plan & Profile drawings with Lidar survey.
12. On December 23, 2020, NYSEG submitted a Self-Report (NPCC2020024361), to NPCC stating that, as a TO, it was potentially in violation of FAC-008-3 R6. The Self-Report identified Facility Rating discrepancies impacting one Facility. NYSEG discovered that the Facility was operating at limits from an outdated thermal study rather than the most recent thermal study. *See*, Self-Report Attachment C. The noncompliance began on June 21, 2007, the date NYSEG was registered as a TO. The noncompliance ended on December 31, 2020, when NYSEG corrected the Facility Rating discrepancies.
13. On October 5, 2020, RG&E submitted a Self-Report (NPCC2020024015) stating that, as a TO, it was potentially in violation of FAC-009-1 R1. RG&E did not follow its Facility Ratings methodology by not identifying all elements on the 345kV transmission circuits. RG&E discovered these Facility Rating errors when attempting to reconcile line rating inconsistencies identified by Avangrid Transmission Planning. It was found that ground fault protection relays in the phase current auxiliary CT path were not included as a potential limiting element. *See*, Self-Report, Attachment D. The noncompliance began on June 21, 2007, the date RG&E was registered as a TO. The noncompliance ended on October 15, 2020, when RG&E corrected the Facility Rating discrepancies.
14. Following the above Self-Reports, Avangrid continued its extent of condition review of its Facility Ratings for all its BES transmission assets in New York and Maine.
15. On November 14, 2022, CMP (NPCC2022-01674) and MEPCO (NPCC2022-01675) submitted Self-Reports stating that, as TOs, they were potentially in violation of FAC-008-5 R6. During field verifications associated with new or upgraded transmission projects, CMP and MEPCO discovered Facility Rating discrepancies for sixty-three (63) line ratings that were inconsistent with its Facility Ratings methodology. Specifically, CMP had identified fifty-eight (58) line rating discrepancies, and MEPCO

³ The Self-Report submitted on February 5, 2020, by NYSEG indicated a potential non-compliance with FAC-008-3 R3. However, NPCC determined that FAC-008-3 R6 is more appropriate for processing this potential noncompliance.

had identified five (5). *See*, Self-Reports, Attachments E and F. The noncompliance began on June 21, 2007, the date CMP and MEPCO were registered as a TOs. The noncompliance is ongoing with an expected end date of June 30, 2024.

16. On April 5, 2023, UI submitted a Self-Report (NPCC2023-00565) stating that, as a TO, it was potentially in violation of FAC-008-5 R6. During a documentation review for a NPCC Self-Certification, UI was unable to locate engineering documentation to support some Facility Ratings. In addition, there was not a clear identification as to what version of the Facility Rating Methodology had been used. *See*, Self-Report, Attachment G. The noncompliance started on June 21, 2007, the date UI was registered as a TO. This noncompliance is ongoing with an expected end date of December 31, 2024.

17. In the above-referenced Self-Reports, and other disclosures made to NPCC, Avangrid detailed a wide-spread issue with the accuracy of its Facility Ratings across five of its OpCos. As of April 1, 2023, Avangrid discovered inaccuracies in the ratings of its Facilities as follows:
 - a. NYSEG discovered inaccuracies in the ratings on 5.6% of total Avangrid Networks Facilities (41 out of 704 Avangrid Networks Facilities).
 - b. RG&E discovered inaccuracies in the ratings on 0.3% of total Avangrid Networks Facilities (2 out of 704 total Avangrid Networks Facilities).
 - c. CMP discovered inaccuracies in the ratings on 10.2% of total Avangrid Networks Facilities (72 out of 704 total Avangrid Networks Facilities).
 - d. MEPCO discovered inaccuracies in the ratings on 0.6% of total Avangrid Networks Facilities (4 out of 704 total Avangrid Networks Facilities).
 - e. UI had not discovered any inaccuracies.

18. As of April 1, 2023, Avangrid was required to reduce the rating of those affected Facilities as follows:
 - a. NYSEG was required to reduce the rating for 2.0% of total Avangrid Networks Facilities (14 out of 704 total Avangrid Networks Facilities).
 - b. RG&E was not required to reduce the rating of its affected Facilities.
 - c. CMP was required to reduce the rating for 5.7% of total Avangrid Networks Facilities (40 out of 704 total Avangrid Networks Facilities).
 - d. MEPCO was not required to reduce the rating of its affected Facilities.
 - e. UI had no rating reductions.

19. As of April 1, 2023, Avangrid discovered the number of Facilities that required a change, reduction, or an increase as follows:
 - a. NYSEG discovered 41 Facilities that required a rating change, 12 of which required at least one (Normal Summer (“NS”), Long Term Emergency Summer (“LTES”), Short Term Emergency Summer (“STES”), Normal Winter (“NW”), Long Term Emergency Winter (“LTEW”), Short Term Emergency Winter (“STEW”) reduction, 24 of which required at least one increase, and 5 with some (NS, LTES, STES, NW, LTEW, STEW) reduction and some increase.

- b. RG&E discovered 2 Facilities that required a rating change, none of which required a reduction, and 2 of which required an increase.
 - c. CMP discovered 72 Facilities that required a rating change, 40 of which required at least one (NS, LTES, STES, NW, LTEW, STEW) reduction, 29 of which required at least one increase, and 3 with some (NS, LTES, STES, NW, LTEW, STEW) reduction and some increase.
 - d. MEPCO discovered 4 Facilities that required a rating change, none of which required a reduction, and 4 of which required an increase.
 - e. UI had no Facilities requiring a rating change.
20. The root cause of these violations includes the following: (1) ineffective interdepartmental coordination or silos between departments; (2) inadequate internal controls for ensuring the accuracy of Facility Ratings; (3) lack of Company-wide rating modification process; and (4) inadequate ratings validation program, including but not limited to a process of reviewing equipment ratings during the transition from a manually maintained database to the current thermal limit database software.
21. As noted above, the violations in this Agreement involve long durations, beginning as early as June 21, 2007, the date NYSEG, RG&E, CMP, MEPCO, and UI were registered as TOs, and ending on various dates starting in 2019 to ongoing.

Risk Assessments

22. A failure to have Facility Ratings that are consistent with the associated Facility Ratings methodology or documentation for determining Facility Ratings could lead to an incorrect Facility Rating if a missing, or incorrectly rated component turns out to be the most limiting element. In all cases of incorrect Facility Ratings, the System Operator is operating with a decreased level of situational awareness in real-time and is monitoring contingencies with reduced accuracy. Incorrect Facility Ratings also result in inaccurate system planning, including planning during short-term studies, long term-studies, seasonal assessments, capital project studies, and other studies. Incorrectly inflated ratings increase the likelihood of equipment damage or failure which could adversely affect electric power transmission system performance. It also increases the risk that the System Operator is operating to incorrect System Operating Limits or Interconnection Reliability Operating Limits. If the Facility Rating was too low, it could have resulted in unnecessary reductions in transfer, or generator output, and/or a perception of congestion that did not really exist. Whether the incorrect ratings were too high or too low, System Operators could have been required to implement reliability actions that otherwise would not have been needed.
23. Regarding the severity of the inaccuracies:
- a. NYSEG derates resulted in Facility Ratings decreasing by a range of approximately 2% to 42% (43% of the derates were less than 10%). The increased ratings resulting in Facility Ratings increasing by a range of approximately 2% to 79% (28% of the increases were less than 10%).

- b. RG&E had no derates. The increased ratings resulted in Facility Ratings increasing by a range of approximately 2% to 84% (50% of the increases were less than 10%).
 - c. CMP derates resulted in Facility Ratings decreasing by a range of approximately 2% to 70% (73% of the derates were less than 10%).
 - d. MEPCO had no derates. The increased ratings resulted in Facility Ratings increasing by a range of approximately 5% to 149% (8% of the increases were less than 10%).
 - e. UI had no derates or increases.
24. None of the derates resulted in Avangrid operating above the correct Facility Ratings in the past three (3) years.
25. Of the seven (7) total violations in this Agreement, NPCC determined that three (3) posed a serious risk to the reliability of the BPS, and four (4) posed a moderate risk to the reliability of the BPS as follows:
- a. NYSEG violations NPCC2020022875, NPCC2020024361 posed a serious risk to the reliability of the BPS.
 - b. RG&E violations NPCC2020024015, NPCC2020024220 posed a moderate risk to the reliability of the BPS.
 - c. CMP violation NPCC2022-01674 posed a serious risk to the reliability of the BPS.
 - d. MEPCO violation NPCC2022-01675 posed a moderate risk to the reliability of the BPS.
 - e. UI violation NPCC2023-00565 posed a moderate risk to the reliability of the BPS.
26. No harm is known to have occurred.
27. NPCC considered Avangrid's compliance history and determined there were no relevant prior instances of noncompliance.

Mitigation

28. To mitigate the violations, Avangrid has completed the following actions:
- a. Developed a comprehensive cross-OpCo Transmission Facility Ratings and Modeling (RAM) Process. This mitigating activity was completed on September 23, 2019.
 - b. Implemented a new Avangrid Facility Ratings Methodology Standard, which supersedes previous individual OpCo methodologies. This mitigating activity was completed on July 19, 2020.
 - c. Created a centralized Rating and Modeling Group with five (5) additional FTEs. This mitigating activity was completed on August, 31, 2020.
 - d. Completed search for Plan & Profile drawings for NYSEG and RG&E transmission lines; conducted LIDAR on transmission lines with missing

Plan & Profile drawings. This mitigating activity was completed on August 18, 2022.

- e. Designed a new database and repository in ProjectWise to control and track Facility Ratings information. This mitigating activity was completed on October 2, 2020.
- f. Conducted training and workshops on the new Facility Ratings process. This mitigating activity was completed on November 16, 2020.
- g. Procured engineering services to perform extent of condition walkdowns and Facility Ratings verification. This mitigating activity was completed on August 3, 2021.

29. Avangrid expects to complete its extent of condition walkdowns by the end of 2024 at an estimated cost of \$7.5 million. Avangrid has been reviewing existing information and conducting walkdowns of the substations. This is 85% complete. Additionally, Avangrid continues to compile the information and update the rating reports as necessary. This is 60% complete. Upon completion of the extent of condition walkdowns, Avangrid shall promptly provide evidence to support the completion to NPCC. NPCC will verify Avangrid's completion and report its completion to NERC.

30. In addition to the mitigation described above, Avangrid agrees to submit monthly reports through the end of 2024. The monthly reports will disclose Facility Ratings discrepancies, if any are identified.

ATTACHMENT A

**Record documents for the violation of FAC-008-3 R6 (NYSEG)
(NPCC2020022875):**

- A. The Entity's Self-Report dated February 5, 2020**

This item was submitted by Kasi McLaughlin (Kasi.McLaughlin@NYSEG.com) on 2/5/2020

Please note that the circumstances under which an Entity would submit a Scope Expansion form are different from what would require a new Self-Report. Please review the material in [this link](#) to see clarifying information and examples of these differences before continuing with this form.

FORM INFORMATION

Registered Entity: NYSEG

NERC Registry ID: NCR07181

JRO ID:

CFR ID: CFR00182, CFR00183 with NYISO

Entity Contact Information: Julie King

REPORTING INFORMATION

Applicable Standard: FAC-008-3

Applicable Requirement: R3.

Applicable Sub Requirement(s): 3.1

Applicable Functions: TO

Has a Possible violation of this standard and requirement previously been reported or discovered: No

Has this Possible Violation previously been reported to other Regions: No

Date Possible Violation was discovered: 6/17/2019

Beginning Date of Possible Violation: 1/1/2013

End or Expected End Date of Possible Violation: 7/15/2019

Is the violation still occurring? No

Provide detailed description and cause of Possible Violation:

Describe the number of facilities, elements, relays, components, or procedures in scope: 115kV Line 960 from NYSEG's Hillside to Caton Ave. substation.
Provide the unique identifier for each facility, element, component, or procedure in scope: Line 960

Detailed Description:

On June 17, 2019 it was determined that the 960 Line thermal ratings information may not have been correctly updated per the FAC-008 standard.

On July 15, 2019, Avangrid Networks Planning business area informed Operations Engineering personnel in the Energy Control Center of a change in the Line 960 ratings. However, discrepancies between the database software TRAnalyzer and the PSSE (power system simulator) were identified by the Planning Department, who then asked the ECC for the ratings used at the ECC. It was determined that the ECC ratings used did agree with the PSSE. In light of the discrepancies found a revision to the ratings information for the 960 Line was requested.

An additional investigation was conducted on 7/31/2019 which found that between 1999 and 2019 two or more projects occurred on the 960 Line that affected the thermal limit of this line, some of which pre-dated the FAC-008 standard. These discrepancies may have also impacted the final determined rating as the results of these projects were not recorded on the thermal rating sheet for this line. Based on the available information of historic projects on Line 960 we believe the following:

- Sometime prior to 1999, the limit on the 960 Line for Summer Normal (SN), Summer Long Term Emergency (SLTE) and Summer Short Term Emergency (SSTE) was calculated to be 102/113/120 MVA.
 - o The SN and SLTE limits were based off of the 400/5 current transformer (CT) at inside the 96012 breaker Hillside
 - o The SSTE limit was based on the CT secondary burden at Caton Ave; which is 120MVA for all ratings.
- In 1999, the previously limiting 400/5 CT at Hillside was re-tapped to 600/5 during a relay upgrade project. This change removed that CT as a limiting element and the secondary burden of relaying at Caton Ave. should have become the new limiting element.
- In 2012 the 96012 breaker at Hillside was replaced, however, the FAC-008 ratings update methodology was not adequately followed again resulting in the thermal rating sheet for the 960 Line to not be correctly updated.
- Based on the rating sheet dated 10/1999 no changes to the thermal rating of the 960 Line were recorded between 10/1999 and 7/2019. However, at some point in the intervening time frame the TRA thermal limit database was created, and this database contained 960 Line ratings that seem to account for the re-tapping of the CT at Hillside Avenue but not for the secondary relay burden limit at Caton Ave.
- Throughout this time period, it seems that the rating limits being used in Operation and Planning were lower than the correct ratings for the line.

Root Cause:

Prior to the effective date of NERC Standard FAC-008, line ratings were tracked manually on a spreadsheet and were transferred into the TRA thermal limit database upon its creation. The root cause for this particular line rating discrepancy was most likely due to one or more of the following factors:

- lack of a formal rating modification process that should have been established once FAC-008 became effective;
- equipment being updated in the field and not properly communicated to the appropriate business areas i.e. Substation Engineering, ECC, and System Planning;
- Substation Engineering receiving information with the equipment change from Operations but failing to update the Tie Line Rating and/or;

• when the manually tracked ratings were transferred from the spreadsheet into the TRA thermal limit database, they were not cross-checked with the PSSE and the ECC.

Are Mitigating Activities in progress or completed? Yes

i An informal Mitigation Plan will be created upon submittal of this Self-Report with mitigating activities. If you would like to formalize that Mitigation Plan, please contact the Region.

If Yes, Provide description of Mitigating Activities:

Upon discovery of the discrepancy the 960 Line thermal rating sheet was updated per the latest info and issued to Planning & the ECC. Completed 7/15/2019

Provide details to prevent recurrence:

A Facility Ratings Flowchart as shown in the attached evidence Ratings Database Flowschart_NY R1.xlsx, had been created prior to the last NERC audit which demonstrates the starting and ending process to be followed with regards to line rating changes. This includes the notification of various departments, including the ECC and System Planning whenever there are changes to existing equipment and/or new equipment that is added on the system.

At a Project Groups all hands meeting/conference call a reminder communication was given which outlined that Tie Line Ratings for 115kV and above equipment are to be updated according to the Ratings Database Flowchart.

In addition Transmission Planning is in the process of creating a new unified Avangrid Equipment Change Process that will require data validation and approval from multiple groups prior to new or modified equipment being energized.

Date Mitigating Activities (including activities to prevent recurrence) are expected to be completed or were completed:

7/15/2019

MITIGATING ACTIVITIES

Title	Due Date	Description	Prevents Recurrence
No data available in table			

Potential Impact to the Bulk Power System: Moderate

Actual Impact to the Bulk Power System: Minimal

Provide detailed description of Potential Risk to Bulk Power System:

The conductor was operating below the thermal limit therefore there was no risk for damage or failure to the equipment. However, the process failure could have had a detrimental impact if the conductor was operating above the thermal limit.

Provide detailed description of Actual Risk to Bulk Power System:

In the case of the 960 Line the ratings in place were artificially lower than what would have been the correct ratings. Since the conductor was operating below the thermal limit there was no risk for damage or failure to the equipment.

Additional Comments:

NOTE: While submittal of a mitigation plan is not required until after a determination of a violation is confirmed, early submittal of a mitigation plan to address and remedy an identified deficiency is encouraged. Submittal of a mitigation plan shall not be deemed an admission of a violation. (See NERC Rules of Procedure, Appendix 4C, Section 6.4.)

ATTACHMENT B

Record documents for the violation of FAC-008-3 R6 (RG&E) (NPCC2020024220):

B. The Entity's Self-Report dated November 13, 2020

This item was submitted by Bill Temple (bill.temple@avangrid.com) on 11/13/2020

Please note that the circumstances under which an Entity would submit a Scope Expansion form are different from what would require a new Self-Report. Please review the material in [this link](#) to see clarifying information and examples of these differences before continuing with this form.

FORM INFORMATION

Registered Entity: Rochester Gas and Electric

NERC Registry ID: NCR07207

JRO ID:

CFR ID: CFR00182, CFR00183 with NYISO

Entity Contact Information: Michele Tondalo

REPORTING INFORMATION

Applicable Standard: FAC-008-3

Applicable Requirement: R6.

Applicable Sub Requirement(s):

Applicable Functions: TO

Has a Possible violation of this standard and requirement previously been reported or discovered: Yes

If yes, provide NERC Violation ID (if known):

NPCC2020024015

Date Reported to Region or Discovered by Region:

10/5/2020

Monitoring Method for previously reported or discovered:

Self-Report

Has this Possible Violation previously been reported to other Regions: No

Date Possible Violation was discovered: 8/15/2020

Beginning Date of Possible Violation: 1/1/2013

End or Expected End Date of Possible Violation: 12/31/2024

Is the violation still occurring? Yes

Provide detailed description and cause of Possible Violation:

During an extent of condition review for a previously self-reported noncompliance for NYSEG (see NPCC2020022875), it was discovered that the plan and profile drawings for 26 BES transmission lines could not be found in the digital repository (ProjectWise) where engineering as-build documentation is stored. A more detailed search was launched right afterwards, and the following additional repositories were searched:

- On-site physical document storages at RG&E and NYSEG main office buildings.
- Network share-drives.
- Off-site physical document storages.
- Digital Repository ProjectWise.

The search concluded in early August 2020 and a small portion of the missing records were found at NYSEG's main office in Binghamton, NY and in the digital repository ProjectWise. Below are the details of the RG&E transmission lines for which plan and profile drawings could not be found:

BES Transmission Line	Actual Miles	From and To substation
901	2.13	MORTIMER to STATION 251
902	1.96	STATION 82 to STATION 251
906	29.76	STATION 128 to STATION 82
907	23.94	STATION 162 to STATION 1185
908	14.02	STATION 13A to STATION 121
909	3.05	STATION 13A to STATION 135
910	3.49	STATION 418 to STATION 67
911	11.58	STATION 13A to STATION 204A to ST 124
912	17.6	STATION 13A to STATION 122
913	11.48	STATION 13A to STATION 124
914	4.04	STATION 121 to STATION 122

917	22.33825758	STATION 7 to STATION 93 to STA 69
919	7.35	STATION 48 to STATION 7
920	4.05	STATION 23 to STATION 42
924	8.27	STATION 128 to STATION 158 to STA 162
925	3.95	STATION 121 to STATION 122
926	5.46	STATION 37 to STATION 48 to STA 67
932	8.57	STATION 42 to STATION 124
933	0.96	STATION 133 to STATION 1185
938	8.57	STATION 42 to STATION 124
945	3.00	STATION 71 to STATION 69
946	4.12	STATION 70 to STATION 71
947	11.56	SPENCERPORT to STATION 70 to 113 to 418
1T tap to Station 13A	0.1	STATION 13A TO STATION 13 GINNA
NGRID #23	0.1	STATION 82 TO STATION 121
NGRID #24	0.1	STATION 122 TO MORIMER (NGRID)

Are Mitigating Activities in progress or completed? No

Potential Impact to the Bulk Power System: Moderate

Actual Impact to the Bulk Power System: Moderate

Provide detailed description of Potential Risk to Bulk Power System:

In cases where ratings differ from actual equipment capability there is a risk to the accuracy of planning studies and operational activities that utilize these ratings. Examples of risk include building of unnecessary system upgrades or damage to the incorrectly rated facility during specific post-contingency emergency loading scenarios.

Provide detailed description of Actual Risk to Bulk Power System:

Lack of plan and profile engineering records does not allow for validation of the ratings for the transmission lines. An under-rated scenario would trigger unnecessary transmission system upgrades, whereas an over-rated scenario would cause equipment to be exposed to conditions beyond their safety operating margin, which in turn could cause equipment failures.

Additional Comments:

NOTE: While submittal of a mitigation plan is not required until after a determination of a violation is confirmed, early submittal of a mitigation plan to address and remedy an identified deficiency is encouraged. Submittal of a mitigation plan shall not be deemed an admission of a violation. (See NERC Rules of Procedure, Appendix 4C, Section 6.4.)

ATTACHMENT C

**Record documents for the violation of FAC-008-3 R6 (NYSEG)
(NPCC2020024361):**

- C. The Entity's Self-Report dated December 23, 2020**

This item was submitted by Kristina Henderson (kristina.henderson@avangrid.com) on 12/23/2020

Please note that the circumstances under which an Entity would submit a Scope Expansion form are different from what would require a new Self-Report. Please review the material in [this link](#) to see clarifying information and examples of these differences before continuing with this form.

FORM INFORMATION

Registered Entity: NYSEG

NERC Registry ID: NCR07181

JRO ID:

CFR ID: CFR00182, CFR00183 with NYISO

Entity Contact Information: Kristina Henderson

REPORTING INFORMATION

Applicable Standard: FAC-008-3

Applicable Requirement: R6.

Applicable Sub Requirement(s):

Applicable Functions: TO

Has a Possible violation of this standard and requirement previously been reported or discovered: Yes

If yes, provide NERC Violation ID (if known):

NPCC2020022875

Date Reported to Region or Discovered by Region:

2/5/2020

Monitoring Method for previously reported or discovered:

Self-Report

Has this Possible Violation previously been reported to other Regions: No

Date Possible Violation was discovered: 5/22/2020

Beginning Date of Possible Violation: 5/21/2020

End or Expected End Date of Possible Violation: 5/22/2020

Is the violation still occurring? No

Provide detailed description and cause of Possible Violation:

On 5/22/2020, while analyzing the Oakdale Bank #3, it was discovered that no facility rating sheets were available in the thermal ratings database for NYSEG and RG&E BES elements, the "Thermal Ratings Analyzer".

On 5/26/2020, a new ratings sheet was produced for the Oakdale Bank #3 tertiary winding and put into the Thermal Ratings Analyzer database. It was found that the ratings determined from the newly created rating sheet was lower than what used in the PSSE planning model. The ECC currently operates the tertiary winding to a rating similar to what was calculated in the newly created sheet which indicates that a rating was determined in the past.

On 6/9/2020 through conversations with former NYSEG employees in attempt to locate historical Oakdale Bank #3 rating sheets, it was discovered that historical ratings sheets for transformers were created in the late 2000's and early 2010's. Studies and overall rating limits for the main windings of the Oakdale Bank #3 have been located, but rating sheets detailing all series elements for Oakdale Bank #3 have not been found.

On 6/16/2020, newly created draft rating sheets for the 345kV and 115kV windings of Oakdale Bank #3 were received from Projects Engineering. During review of those rating sheets, it was found that the ECC has operating limits consistent with a thermal study performed in 2000 and not from a more recent 2009 thermal study.

The new rating sheets were then sent to AVANGRID System Protection & Control for their portion of the thermal ratings process. This activity was completed on 8/10/20.

The finalized rating sheets have entered the AVANGRID rating and modeling process for final approval. The result of the approval process will include updates to the regional powerflow model maintained by NYISO.

Are Mitigating Activities in progress or completed? Yes

An informal Mitigation Plan will be created upon submittal of this Self-Report with mitigating activities. If you would like to formalize that Mitigation Plan, please contact the Region.

If Yes, Provide description of Mitigating Activities:

Before this issue was identified, AVANGRID developed and put into a practice a comprehensive cross opco Transmission Facility Ratings and Modeling (RAM) Process which went into effect on 9/23/2019. This process includes significant controls, including rating activities that must be completed prior to energization of any new equipment.

On 5/26/2020, a draft ratings sheet was produced for the Oakdale Bank #3 tertiary winding and put into the Thermal Ratings Analyzer database.

On 6/16/2020 draft rating sheets for the 345kV and 115kV windings were received. These sheets were then sent to AVANGRID System Protection & Control for their review and update, their portion of the task was completed on 8/10/20.

The finalized rating sheets have entered the AVANGRID rating and modeling process for final approval. The result of the approval process will include updates to the regional powerflow model maintained by NYISO.

Provide details to prevent recurrence:

Produce new draft ratings sheet for tertiary winding Completed 05/26/2020
Produce new draft ratings sheet for primary and secondary winding Completed 08/10/2020
Finalize rating sheet using RAM process In progress 12/15/2020
Create correction script for model In progress 12/31/2020
Send case correction to NYISO Not Started 12/31/2020

Date Mitigating Activities (including activities to prevent recurrence) are expected to be completed or were completed:

12/31/2020

MITIGATING ACTIVITIES

Title	Due Date	Description	Prevents Recurrence
No data available in table			

Potential Impact to the Bulk Power System: Minimal

Actual Impact to the Bulk Power System: Minimal

Provide detailed description of Potential Risk to Bulk Power System:

The summer emergency ratings used by the ECC to monitor this facility are greater than the limits established by a bushing thermal study performed in 2009. This study found that 115 kV bushings should be operated at reduced maximum temperatures to prevent damage. If the transmission system had required full use of the emergency ratings during specific post-contingency scenarios these low voltage bushings could have been damaged.

Provide detailed description of Actual Risk to Bulk Power System:

There are no known impacts or risks to the Bulk Power System that resulted from this event.

Additional Comments:

[Empty text area for additional comments]

NOTE: While submittal of a mitigation plan is not required until after a determination of a violation is confirmed, early submittal of a mitigation plan to address and remedy an identified deficiency is encouraged. Submittal of a mitigation plan shall not be deemed an admission of a violation. (See NERC Rules of Procedure, Appendix 4C, Section 6.4.)

ATTACHMENT D

Record documents for the violation of FAC-009-1 R1 (RG&E) (NPCC2020024015):

D. The Entity's Self-Report dated October 5, 2020

This item was submitted by Bill Temple (bill.temple@avangrid.com) on 10/5/2020

Please note that the circumstances under which an Entity would submit a Scope Expansion form are different from what would require a new Self-Report. Please review the material in [this link](#) to see clarifying information and examples of these differences before continuing with this form.

FORM INFORMATION

Registered Entity: Rochester Gas and Electric

NERC Registry ID: NCR07207

JRO ID:

CFR ID: CFR00182, CFR00183 with NYISO

Entity Contact Information: Bill Temple

REPORTING INFORMATION

Applicable Standard: FAC-009-1

Applicable Requirement: R1.

Applicable Sub Requirement(s):

Applicable Functions: TO

Has a Possible violation of this standard and requirement previously been reported or discovered: No

Has this Possible Violation previously been reported to other Regions: No

Date Possible Violation was discovered: 12/1/2019

Beginning Date of Possible Violation: 6/18/2007

End or Expected End Date of Possible Violation: 10/15/2020

Is the violation still occurring? No

Provide detailed description and cause of Possible Violation:

RGE did not properly follow its ratings procedure per FAC-008-3; R6 by not identifying all elements on the 345kV transmission circuits (NR-1 (also known as SR-1), NR-2, RP-1, RP-2, PC-1, and PC-2).

These facility rating errors were discovered when attempting to reconcile line rating inconsistencies that were first identified by Avangrid Transmission Planning in October 2019. During this investigation and peer review, it was concluded that ground fault protection relays in the phase current auxiliary CT path were not included as a potential limiting element.

The correct ratings for these lines is approximately 400 MVA. The incorrect application of the FAC-008 rating methodology and exclusion of these ground protection relays resulted in a line rating of approximately 1000 MVA.

The incorrect ratings and a mitigation plan were reported to RGE Operations and sent to the NYISO on 12/18/2019.

Root Cause:

Protection and Control Principal Engineers have determined that the department executing the initial FAC-008 methodology failed to properly identify all limiting elements as required.

Are Mitigating Activities in progress or completed? Yes

An informal Mitigation Plan will be created upon submittal of this Self-Report with mitigating activities. If you would like to formalize that Mitigation Plan, please contact the Region.

If Yes, Provide description of Mitigating Activities:

Mitigation Actions:

- PHASE ONE (COMPLETED 12/18/19): Disable protection relay 21G Zone 1 and eliminate it from the CT circuit.
- This phase was implemented on lines PC-1 & PC-2 at ST122 and NR-1 & NR-2 at ST80.
- PHASE TWO (COMPLETED 12/19/19): Move protection 21G Z2 Z3 and 21TTFD out of 15A current path and into the 5A current path.
- This phase was implemented on lines PC-1 & PC-2 at ST122 and NR-1 & NR-2 at ST80.

- PHASE THREE: (COMPLETED 5/1/2020): Complete upgrade of the System A Protection Package with digital relays.
- This phase was implemented on terminal PC-1, PC-2, RP-1, RP-2 at ST122 and NR-1, NR-2, RP-1, RP-2 at ST80.
- PHASE FOUR: Review other locations that use the same protection devices to make sure their limiting elements are correctly identified at all Avangrid BES locations. This will be completed by 10/15/20

Provide details to prevent recurrence:

Actions to Prevent Recurrence:

- Avangrid recently created a unified methodology process for calculation, review and approval of Facilities Ratings that addresses the following issues:
- Roles and responsibilities have been clarified and aligned with the latest organizational changes.
 - Ownership of the overall process has been clearly identified.
 - Additional layers of peer review and approval have been added to mitigate rating errors.

Date Mitigating Activities (including activities to prevent recurrence) are expected to be completed or were completed:

10/15/2020

MITIGATING ACTIVITIES

Title	Due Date	Description	Prevents Recurrence
Phase One	12/18/2019	PHASE ONE: Disable protection relay 21G Zone 1 and eliminate it from the CT circuit. • This phase was implemented on lines PC-1 & PC-2 at ST122 and NR-1 & NR-2 at ST80.	No
Phase Two	12/19/2019	PHASE TWO: Move protection 21G Z2 Z3 and 21TTFD out of 15A current path and into the 5A current path. • This phase was implemented on lines PC-1 & PC-2 at ST122 and NR-1 & NR-2 at ST80.	No
Phase Three	5/1/2020	PHASE THREE: Complete upgrade of the System A Protection Package with digital relays. • This phase was implemented on terminal PC-1, PC-2, RP-1, RP-2 at ST122 and NR-1, NR-2, RP-1, RP-2 at ST80	No
Phase Four	10/15/2020	PHASE FOUR: Review other locations that use the same protection devices to make sure their limiting elements are correctly identified at all Avangrid BES locations.	No
Avangrid Unified Ratings Methodology	7/29/2020	Avangrid recently created a unified methodology process for calculation, review and approval of Facilities Ratings that addresses the following issues: • Roles and responsibilities have been clarified and aligned with the latest organizational changes. • Ownership of the overall process has been clearly identified. • Additional layers of peer review and approval have been added to mitigate rating errors.	Yes

Potential Impact to the Bulk Power System: Moderate

Actual Impact to the Bulk Power System: Minimal

Provide detailed description of Potential Risk to Bulk Power System:

The affected Transmission circuits are a critical piece of NY's transmission system. Incorrect facility ratings that did not identify a protective relay as a limiting element could damage the relay, cause these facilities to be tripped unexpectedly, and remain out of service until the affected devices can be bypassed. The loss of a single relay on a BPS element is a contingency that must be tested using NPCC Directory #1 (i.e. the system performance with System A relays or System B relays out of service must be within all contingencies and criteria).

Provide detailed description of Actual Risk to Bulk Power System:

The incorrect facility ratings on these lines have been in effect for an extended period of time with loading routinely exceeding the thermal limits of the ground fault protection relays; these relays have been routinely tested and there has been no degradation in protection or obvious indication of damage.

Ratings provided by relaying manufacturers are established at specific environmental conditions (e.g., temperature, relative humidity, air circulation, etc.) and are not recalculated or recertified for operation for different environmental conditions. Avangrid contacted the relay manufacturer to inquire about thermal overload capabilities of the relays and the manufacturer was not able to confirm or recalculate any overloading beyond the normal base rating.

As evidenced by the performance of these relays - a combination of relay manufacturer engineering margin and beneficial environmental conditions have permitted these relays to operate above their thermal limit with minimal actual impact to the Bulk Power System.

Additional Comments:

NOTE: While submittal of a mitigation plan is not required until after a determination of a violation is confirmed, early submittal of a mitigation plan to address and remedy an identified deficiency is encouraged. Submittal of a mitigation plan shall not be deemed an admission of a violation. (See NERC Rules of Procedure, Appendix 4C, Section 6.4.)

ATTACHMENT E

Record documents for the violation of FAC-008-5 R6 (CMP) (2022-01674):

E. The Entity's Self-Report dated November 14, 2022

Finding Record - Violation ID: 2022-01674

General information

Compliance Enforcement Authority:	NPCC
Registration:	NCR07029 - Central Maine Power Company
Applicable Requirement:	FAC-008-5 R6.
Applicable Part(s):	
Applicable Reliability Function(s):	TO
Region - Jurisdiction in which the Potential Noncompliance Occurred:	NPCC-US
Other Region - Jurisdiction(s) where you are reporting this Potential Noncompliance:	
Entity in Coordinated Oversight:	No
Associated Registrations Impacted:	
If Finding from Audit, related Audit Finding ID:	
Finding Created by CEA:	No

Discovery and Description

Monitoring Method:	Self-Report
When was the Potential Noncompliance discovered?:	February 28, 2021
When did the Potential Noncompliance start?:	June 21, 2007
Is the Potential Noncompliance still occurring?:	Yes
When did you return to compliance?:	
What is the basis for selecting the start date?:	This date was when CMP became a registered entity with NERC/NPCC.
How was the Potential Noncompliance Discovered?:	As part of an extent of condition analysis for self-reports NPCC2020022875 (NYSEG) & NPCC2020024015 (RG&E), the Company has been performing an evaluation of its facility ratings for all BES transmission assets in NY and ME.
Please describe the Potential Noncompliance in detail:	<p>FAC-008 R6 requires that TOs have Facility Ratings for all its applicable facilities. These ratings most often are in the form of thermal rating sheets.</p> <p>Central Maine Power (CMP) and Maine Electric Power Company (MEPCO) discovered facility rating discrepancies for a total sixty-three (63) line ratings that were inconsistent with its Facility Ratings methodology. CMP has 58 line rating discrepancies, while MEPCO has 5.</p> <p>Since January 2021, Avangrid has been providing the NPCC with monthly reports identifying discrepancies with facility ratings. To date, Avangrid has reported all sixty-three (63) discrepancies to NPCC.</p>

Extent of Condition and Root Cause

Has an Extent of Condition Review been performed?:	Yes
If yes, what was/is the Extent of Condition?:	CMP and MEPCO have determined that there are sixty-three (63) incorrect line ratings in total. CMP has 58 and MEPCO has 5.
What cause(s) led to the Potential Noncompliance?:	<p>The root cause of the non-compliance was a result of changes made in the field that affected ratings, but were not properly captured in the ratings database due to ineffective controls to ensure facility ratings are maintained current.</p> <p>The root cause of this situation has been addressed by the Avangrid Transmission Facility Ratings and Modeling Process which went into effect on 9/23/2019 with training being conducted during November 2019. This process includes significant compliance controls, including equipment rating requirements that must be completed prior to energization of any new equipment.</p>

Risk and Impact

<p>What do you think the Potential Impact to the BPS was/is from this Potential Noncompliance?:</p>	<p>Moderate</p>
<p>Why do you believe that to be the correct Potential Impact?:</p>	<p>CMP/MEPCO failed to maintain accurate facility ratings within its system of record resulting in discrepancies. These facility ratings posed the risk that limits for certain facilities could have been exceeded resulting in damage to those facilities, or alternatively, that those facilities could have been unnecessarily tripped off-line. In particular, the incorrect facility ratings for 34 of the 63 facilities at issue were higher than those facility's actual facility ratings, increasing the risk of an inadvertent exceedance and associated equipment damage.</p> <p>However, the risk was minimized by several factors. As an initial matter, the Company's internal facility ratings for 29 of the 63 facilities at issue were more conservative than the facilities' actual facility ratings. The Company detected the facility rating discrepancies during field verifications associated with new or upgraded transmission projects and corrected its internal facility rating documentation. This indicates the presence of detective controls to identify and address facility ratings issues associated with equipment changes. No harm is known to have occurred.</p>
<p>How likely is it that Impact could have occurred?:</p>	<p>Unlikely</p>
<p>Was there any actual impact to the BPS?:</p>	<p>No</p>
<p>If yes, what was the Actual Impact to the BPS?</p>	

Additional Comments

<p>Please provide any additional comments</p>	
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ATTACHMENT F

Record documents for the violation of FAC-008-5 R6 (MEPCO) (2022-01675):

F. The Entity's Self-Report dated November 14, 2022

Finding Record - Violation ID: 2022-01675

General information

Compliance Enforcement Authority:	NPCC
Registration:	NCR07134 - Maine Electric Power Company
Applicable Requirement:	FAC-008-5 R6.
Applicable Part(s):	
Applicable Reliability Function(s):	TO
Region - Jurisdiction in which the Potential Noncompliance Occurred:	NPCC-US
Other Region - Jurisdiction(s) where you are reporting this Potential Noncompliance:	
Entity in Coordinated Oversight:	No
Associated Registrations Impacted:	
If Finding from Audit, related Audit Finding ID:	
Finding Created by CEA:	No

Discovery and Description

Monitoring Method:	Self-Report
When was the Potential Noncompliance discovered?:	February 28, 2021
When did the Potential Noncompliance start?:	June 21, 2007
Is the Potential Noncompliance still occurring?:	Yes
When did you return to compliance?:	
What is the basis for selecting the start date?:	This date was when CMP & MEPCO became registered entities with NERC/NPCC.
How was the Potential Noncompliance Discovered?:	As part of an extent of condition analysis for self-reports NPCC2020022875 (NYSEG) & NPCC2020024015 (RG&E), the Company has been performing an evaluation of its facility ratings for all BES transmission assets in NY and ME.
Please describe the Potential Noncompliance in detail:	<p>FAC-008 R6 requires that TOs have Facility Ratings for all its applicable facilities. These ratings most often are in the form of thermal rating sheets.</p> <p>Central Maine Power (CMP) and Maine Electric Power Company (MEPCO) discovered facility rating discrepancies for a total sixty-three (63) line ratings that were inconsistent with its Facility Ratings methodology. CMP has 58 line rating discrepancies, while MEPCO has 5.</p> <p>Since January 2021, Avangrid has been providing the NPCC with monthly reports identifying discrepancies with facility ratings. To date, Avangrid has reported all sixty-three (63) discrepancies to NPCC.</p>

Extent of Condition and Root Cause

Has an Extent of Condition Review been performed?:	Yes
If yes, what was/is the Extent of Condition?:	CMP and MEPCO have determined that there are sixty-three (63) incorrect line ratings in total. CMP has 58 and MEPCO has 5.
What cause(s) led to the Potential Noncompliance?:	<p>The root cause of the non-compliance was a result of changes made in the field that affected ratings, but were not properly captured in the ratings database due to ineffective controls to ensure facility ratings are maintained current.</p> <p>The root cause of this situation has been addressed by the Avangrid Transmission Facility Ratings and Modeling Process which went into effect on 9/23/2019 with training being conducted during November 2019. This process includes significant compliance controls, including equipment rating requirements that must be completed prior to energization of any new equipment.</p>

Risk and Impact

<p>What do you think the Potential Impact to the BPS was/is from this Potential Noncompliance?:</p>	<p>Moderate</p>
<p>Why do you believe that to be the correct Potential Impact?:</p>	<p>CMP/MEPCO failed to maintain accurate facility ratings within its system of record resulting in discrepancies. These facility ratings posed the risk that limits for certain facilities could have been exceeded resulting in damage to those facilities, or alternatively, that those facilities could have been unnecessarily tripped off-line. In particular, the incorrect facility ratings for 34 of the 63 facilities at issue were higher than those facility's actual facility ratings, increasing the risk of an inadvertent exceedance and associated equipment damage.</p> <p>However, the risk was minimized by several factors. As an initial matter, the Company's internal facility ratings for 29 of the 63 facilities at issue were more conservative than the facilities' actual facility ratings. The Company detected the facility rating discrepancies during field verifications associated with new or upgraded transmission projects and corrected its internal facility rating documentation. This indicates the presence of detective controls to identify and address facility ratings issues associated with equipment changes. No harm is known to have occurred.</p>
<p>How likely is it that Impact could have occurred?:</p>	<p>Unlikely</p>
<p>Was there any actual impact to the BPS?:</p>	<p>No</p>
<p>If yes, what was the Actual Impact to the BPS?</p>	

Additional Comments

<p>Please provide any additional comments</p>	
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ATTACHMENT G

Record documents for the violation of FAC-008-5 R6 (UI) (2023-00565):

G. The Entity's Self-Report dated April 5, 2023

Finding Record - Violation ID: 2023-00565

General information

Compliance Enforcement Authority:	NPCC
Registration:	NCR07222 - United Illuminating Company
Applicable Requirement:	FAC-008-5 R6.
Applicable Part(s):	
Applicable Reliability Function(s):	TO
Region - Jurisdiction in which the Potential Noncompliance Occurred:	NPCC-US
Other Region - Jurisdiction(s) where you are reporting this Potential Noncompliance:	
Entity in Coordinated Oversight:	No
Associated Registrations Impacted:	
If Finding from Audit, related Audit Finding ID:	
Finding Created by CEA:	No

Discovery and Description

Monitoring Method:	Self-Report
When was the Potential Noncompliance discovered?:	March 17, 2023
When did the Potential Noncompliance start?:	June 21, 2007
Is the Potential Noncompliance still occurring?:	Yes
When did you return to compliance?:	
What is the basis for selecting the start date?:	This date was when UI became a registered entity with NERC/NPCC.
How was the Potential Noncompliance Discovered?:	Discovered during review of documentation for the NPCC Level 3 Self-Certification.
Please describe the Potential Noncompliance in detail:	FAC-008 R6 requires that TOs have Facility Ratings for all its applicable facilities. These ratings most often are in the form of thermal rating sheets. Upon researching for evidence, we discovered a potential noncompliance at UI in that we could not locate engineering documentation to support some facility ratings.

Extent of Condition and Root Cause

Has an Extent of Condition Review been performed?:	In Progress
If yes, what was/is the Extent of Condition?:	
What cause(s) led to the Potential Noncompliance?:	<p>The root cause of the potential non-compliance is not having proper maintenance of the ratings database in order to have supporting documentation for equipment not rated according to the methodology. There also was not a clear identification as to what version of the facility rating methodology had been used.</p> <p>The root cause of this situation has been addressed by the Avangrid Transmission Facility Ratings and Modeling Process which went into effect on 9/23/2019 with training being conducted during November 2019. This process includes significant compliance controls, including equipment rating requirements that must be completed prior to energization of any new equipment.</p>

Risk and Impact

What do you think the Potential Impact to the BPS was/is from this Potential Noncompliance?:	Moderate
Why do you believe that to be the correct Potential Impact?:	UI failed to maintain supporting documentation for facility ratings. These facility ratings posed the risk that limits for certain facilities could have been exceeded resulting in damage to those facilities, or alternatively, that those facilities could have been unnecessarily tripped off-line.
How likely is it that Impact could have occurred?:	Unlikely
Was there any actual impact to the BPS?:	No
If yes, what was the Actual Impact to the BPS?	

Additional Comments

Please provide any additional comments	We have been taking steps to identify facility rating discrepancies; update the ratings in our system; and communicate these updates to the appropriate entities.
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