



July 23, 2010

**VIA ELECTRONIC FILING**

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, D.C. 20426

Re: NERC Notice of Penalty regarding Hermiston Generating Co., L.P.  
FERC Docket No. NP10-133-000

Dear Ms. Bose:

On July 6, 2010, the North American Electric Reliability Corporation (“NERC”) submitted a Notice of Penalty regarding a violation of Reliability Standard VAR-002-1 Requirement (R) 1 for Hermiston Generating Co., L.P. (“Hermiston”). By this filing, NERC clarifies that Hermiston restored the Automatic Voltage Regulation (“AVR”) to service in five hours and twenty minutes (1809 – 2329 PPT). Hermiston originally self-reported that the AVR returned to automatic mode on 2129; however, Hermiston submitted a revised self-report (enclosed) and corrected the time the AVR returned to automatic mode to 2329 PPT.

Accordingly, NERC respectfully requests that the Commission accept this supplemental filing and issue an order consistent with the comments provided herein.

Respectfully submitted,

/s/ Rebecca J. Michael  
Rebecca J. Michael

*Attorney for North American Electric  
Reliability Corporation*

Enclosure: revised self-report

cc: Official service list in Docket No. NP10-133-000



Western Electricity Coordinating Council

### Self-Reporting Form

Date Submitted by Registered Entity: July 31, 2009

NERC Registry ID: NCR05179

Joint Registration Organization (JRO) ID:

Registered Entity: Hermiston Generating LLC

Registered Entity Contact: Catherine Hastings

**Function(s) Applicable to Self-Report:**

- BA       TOP       TO       GO       GOP       LSE
- DP       PSE       TSP       PA       RP       TP
- RSG       RC       IA       RRO

Standard: VAR-002-1.1a

Requirement: R1 and R3.1

Has this violation previously been reported or discovered:  Yes       No

If Yes selected: Provide NERC Violation ID (if known):

Date violation occurred: July 4, 2009

Date violation discovered: July 10, 2009

Is the violation still occurring?  Yes       No

Detailed explanation and cause of violation: The Hermiston Generating Plant is a nominal 480 MW generating plant that connects to the Bonneville Power Administration (BPA) McNary Substation via a 230 kV radial line. BPA is the Transmission Operator for the line.

On July 4, 2009 at 18:09 the HGP Control Room received an alarm that the Automatic Voltage Regulation (AVR) on Unit 1 Steam Turbine had switched to the manual mode. The Lead Operator and Maintenance Technician (Lead O&M Tech) responded to the alarm and investigated the situation. The operator determined that the cause of the alarm was the failure of the air conditioning units in the enclosure where the voltage regulating equipment is located. The operator took measures to correct the situation (ie opening doors and resetting air conditioning units). At 23:29 of the same evening, the voltage regulator was returned to Automatic Mode. During the time the AVR was in manual, the Lead O&M Tech kept the MVAR output of the machine at approximately 9-10 MVAR to meet the BPA voltage schedule.



Although the voltage schedule was not impacted during this time, and the operator took reasonable action to restore AVR, the operator did not notify the TOP of the AVR being in manual (R1). In addition, the Lead O&M Tech did not notify the TOP within 30 minutes of a status change on the ST reactive power resource or the expected duration of the change (R3.1).

**Potential Impact to the Bulk Power System (minimal, moderate, or severe): Minimal**

**Detailed explanation of Potential Impact:** HGP follows the BPA voltage schedule and under normal conditions exports approximately 60 MVARs total from the (4) generating units. The impact to the system was minimal since the event occurred only on 1 steam turbine generator excitation system which under normal operating conditions exports approximately 9-10 MVARs to the system and could at the maximum export approximately 25 VARs if a system excursion had occurred. During this time the other three generators were in operating in the automatic mode and the BPA voltage schedule was being followed. Unit 1 ST was following the BPA voltage schedule in the manual mode.

**Additional Comments:**

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***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.)*