



May 19, 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 Tri-State Generation and Transmission Association, Inc. – Marketing, FERC Docket No. NP10-100-000

Dear Ms. Bose:

On April 28, 2010, the North American Electric Reliability Corporation (“NERC”) submitted a Notice of Penalty regarding Tri-State Generation and Transmission Association, Inc. – Marketing (“Tri-State”) regarding a violation of IRO-STD-006-0 WR1. By this filing, NERC and the Western Electricity Coordinating Council (“WECC”) submit the attached letter from Tri-State which provides additional details regarding Tri-State’s training program for new and existing employees that was implemented as part of the related mitigation plan to address the instant violation and to prevent recurrence of violations of this Reliability Standard.

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*

cc: Official service list in Docket No. NP10-100-000


**Via WECC Compliance WEB PORTAL**
**CONFIDENTIAL**

May 17, 2010

Chris Luras  
 WECC Manager of Compliance Enforcement  
 Western Electric Coordinating Council  
 155 North 400 West, Suite 200  
 Salt Lake City, Utah 84103

NERC Registration ID: NCR05432  
 NERC Violation ID: WECC200901754

Subject: Response to WECC Request for Information in Regards to  
 Reliability Standard IRO-STD-006-0 Requirement WR1  
 Addendum to Tri-State Generation and Transmission Assn., Inc. Mitigation Plan

Dear Chris,

Tri-State Marketing (TSMD's) system load and generation balancing responsibilities are consistently impacted by unscheduled flow (USF) events on all six WECC "Qualified Paths", including "Competing USF Events". TSMD takes our compliance obligation for response to unscheduled flow events very seriously and provides continual training and communication regarding unscheduled flow requirements to both new and existing employees.

**TSMD Training Plan Improvement to Prevent Recurrence of Violation of IRO-STD-006-0**

**Training for New Employees** for IRO-006-STD-0 is introduced in our "*Market Execution Training Program, 2 Year Plan*" (Developed 1/6/2010; attached) in two phases:

- Month 1 Training Schedule, Compliance Section
- Months 2-6 Comprehensive Training of Core Learning Fundamentals
  - Electric Transmission System Characteristics
    - Unscheduled Flow Mitigation and webSAS Simulation Training

**Continuing Training for Existing employees** is conducted prior to each expected "Unscheduled Flow Season", typically autumn and late spring each year. We comprehensively refresh conceptual, technical, and simulation skills in preparation for the upcoming Unscheduled Flow season.

- Unscheduled flow technical concepts are taught based on the use of "Unscheduled Flow Mitigation Procedures" Manual, written in 2005 by Robert Eubank, now WECC Training Manager. (Copy Attached)
- Additional training is provided through a PowerPoint presentation and quiz developed in 2007 by Lisa Tiffin, then Market Compliance Coordinator. (Copy Attached)





### **Hands-On Simulation Training**

As a result of our 6/23/2009 IRO-006-STD-0 violation, we identified a missing training element of hands-on simulation and now utilize the “demo” environment of the OATI webSAS Unscheduled Flow Mitigation Tool for simulation exercises for new and existing employees.

### **Communication and Industry Involvement**

- The TSMD “Market Training, Regulatory and Compliance Coordinator” (MTRCC), is an active, permanent visiting member of the WECC Unscheduled Flow Administrative Subcommittee, and a voting member of the Unscheduled Flow Task Force (USFTF; previous USF Drafting Team). The MTRCC assists the USFTF with development, testing, and training of proposed IRO-006-WECC-1, and communications status regularly with TSMD personnel in quarterly staff meetings, training sessions, and emails.
- TSMD Shift Employees actively communicate operational issues that could put TSMD at risk, to TSMD Management, MTRCC, or Sr. Analyst for resolution with neighboring systems, regions or industry workgroups as documented in the USF evidence listed below (10/1/09-10/17/09).

### **Management Support of Reliability Standard Compliance**

The TSMD Sr. Manager, Energy Markets, and the Market Execution Manager, each actively communicate the importance and imperativeness of compliance with IRO-006-0 through quarterly staff meetings and the posting of staff-required reading of all actions taken on the 6/23/09 violation addressed in this letter on the Market Execution Intranet website.

### **Attached Supporting Evidence**

- TSMD Market Execution 2 Year Training Plan to indicate inclusion of USF Training
- May 25, 2009 Email from Janelle Marriott to all TSMD Shift Personnel issuing Unscheduled Flow Course, Quiz, and NERC Standard bi-annual review and refresher training
  - Copy of Unscheduled Flow Power Point Course
  - Copy of Unscheduled Flow Quiz
  - Copy of USF Training Manual 2005 (PDF) by Robert Eubank
- June 9, 2009 WECC Letter signed by Paul W. Rice to issue Summer 2009 TDF Matrices; issued as an email to all TSMD Shift employees.
- June 30, 2009 Open and Closed OATI Support “Tickets” to verify webSAS Demo System Access requested by TSMD, Janelle Marriott, and provided by OATI for purpose of new simulation training.



- July 1, 2009 Email Janelle Marriott to record July 2009 Shift Training Schedule to reinforce Unscheduled Flow Training and other items to all TSMD Shift Employees.
- July 1, 2009 Email Janelle Marriott to record July 2009 Shift Training Agenda to reinforce Unscheduled Flow Training and other items to all TSMD Shift Employees.
- July 15, 2009 Email Janelle Marriott to all TSMD Shift Employees re-issuing Unscheduled Flow Training Course, Quiz, and Emergency Handoff Sheet to support mitigation plan and emphasizing our commitment to exceed our required responses.
- October 1 thru October 17 Email series from TSMD Shift personnel expressing concern of impact of new delivery point on USF TDF Mapping, communicated to WECC Staff and changed; issued to TSMD Shift personnel for signature required reading.
- October 16, 2009 WECC Letter signed by Paul W. Rice to issue Winter 2009-10 webSAS TDF Matrix Updates; required reading signature by all shift employees.
- December 23, 2009 Issuance of WECC 12/18/09 NOAV Letter for required reading and employee signature by all shift employees.

Please contact me if you have any questions or need further information.

Sincerely,

Luis Zaragoza  
Compliance Program Manager

LZ:jm

cc: Janelle Marriott, TSMD Market Training, Regulatory and Compliance Coordinator  
Laura Scholl, Managing Director of Compliance  
Sara Minges, NERC Legal Assistant  
Dan Walter, TSMD Sr. Manager, Energy Markets  
Laura Marino, TSMD Market Execution Manager



*Tri-State Generation and Transmission Assn., Inc.*  
*Market Execution Training Program*  
*2 Year Plan*

*Month 1 Training Schedule*

- **Tri-State System Overview and Introduction to:**
  - TS Member Locations, Load Concept and Characteristics
  - Generation Concept and Facilities
  - Fuel Sources: Coal, Natural Gas, Oil, Hydro, Solar, Wind
  - Transmission System Concept and Facilities
  - Marketing Purchase/Sale to Balance System Load
  - Regions (WECC, MRO, SPP), Balancing Authorities
  - Reserve Groups (RMRG, SRSG)
  - Electric Scheduling Fundamentals
    - Point of Receipt/Point of Delivery
    - Balance and Interchange
    - Clock Time, Peak/Off Peak
    - Tagging
  - Gas Scheduling Fundamentals
    - Pipelines
    - Nominations
    - Use and Imbalance
  - Energy Markets Software Applications
  - Electric and Gas Industry Terminology
  - Electric and Gas Business Practices (Regional and NAESB)
- **Compliance**
  - Tri-State Standards of Conduct Training
  - Tri-State Market Transparency Course
  - NERC Reliability Standard Training: Generator Owner, Generator Operator, Load Serving Entity, Purchase/Selling Entity
  - Cyber Infrastructure Protection
    - Marketing and Generation Critical Assets
  - Emergency Operations
  - Evidence and Communication; Electronic Logging, Voice Recordings
- **Introductory Shadow of Energy Management Short Term Workflow**
  - Load Forecast and Natural Gas Unit Forecast
  - Day Ahead Trading and Gas Nominations
  - Pre-Schedule
  - Generation Dispatch (ERC), Real Time Marketing (1 night shift)
  - Netting and Settlements
- **Introductory Shadow of Energy Management Long Term Workflow**
  - Long Term Load Forecasting
  - Long Term Merchant Transmission
  - Long Term Contract Origination and Renewable Resources
  - Planning and Analytics
  - Risk Management
  -

*Introductory Skill Competency Evaluation by Trainer and Manager*

*Month 2-6 Training Schedule*

- **Core Learning Fundamentals**
  - **Begin SOS Online Coursework, WECC System Operations Overview Course, Tri-State in-house Training to Support the following fundamental learning requirements:**
  - **Generation Facility Characteristics**
    - **Unit Capabilities and Operating Parameters**
    - **Joint Owned Facility Operation**
    - **Peaking Unit Characteristics**
    - **Renewable Resource Generators**
    - **Operating Agreements and Obligations**
    - **Coal and Peaking Unit Site Tours**
    - **Fundamentals of Power Plant Operations Course (Craig)**
  - **Electric Transmission System Characteristics**
    - **Providers, Path Location, Procurement, Products**
    - **Unscheduled Flow and webSAS Software Training**
    - **OASIS Software Training**
  - **Gas Transmission System Characteristics**
    - **Pipeline Providers and Location**
    - **Nominations and Imbalance**
    - **Provider Software System Training**
  - **System Scheduling, Balance and Interchange Fundamentals**
    - **Contractual Obligations, Hazard, Swaps, Undesignation, Dynamic Scheduling and unique load obligations**
    - **Counterparties, Deals, Trading Limits, Pricing**
    - **Load Forecasting Real Time Tools**
    - **Scheduling and Tagging Software Training**
    - **Hub Balancing and Balancing Authority Checkout**
    - **WECC System Scheduling Course; BA Site Visits**
  - **Reserves**
    - **RMRG Procedures and Software Simulation**
    - **SRSG Procedures, Scenarios, Tagging**
  - **SCADA Terminal and Data Training**
  - **Emergency Operations**
    - **Energy Markets and System Operations Emergency Operations Procedure Training for loss of software applications, phones, SCADA, cyber attack and facility evacuation. Response to Generation Facility loss of same.**
    - **Emergency Halt of Standards of Conduct**
    - **Participate in Emergency Evacuation Drill**
    - **Participate in Cyber Attack Drill**
  - **Shadow RT Marketer 1 Night Shift Each Month**

*6 Month Skill Competency Evaluation by Trainer and Manager*

*Months 6-12 Training Schedule*

- **Begin Rotation Shadow with Real Time Marketer Position**
- **Focused Economic Decision Training with Energy Portfolio Group**
- **Focused Risk Management Training**
- **Focused Load Forecasting Training with Energy Portfolio**
- **Continue Focused Transmission System Training**
- **Focused Communication Training, Phone and Electron Logging**
- **Focused Review of Reliability Standard Requirements**
- **Complete SOS Online Courses**
- **Participate in bi-Annual Emergency Evacuation Drill**

*12 Month Skill Competency Evaluation by Trainer, Shadow Partners, and Manager*

*Months 12-24 Training Schedule*

- **Continue Shadow of Real Time Marketer Position, alternately performing solo on shift.**
- **Alternately Shadow Energy Resource Coordinator Position**
- **Pursue and Test for NERC Certification**
  - **SOS Online Courses**
  - **Power System Operations**
  - **WECC/SOS off-site NERC Prep Course**
  - **WECC System Operator Manual**
  - **Rocky Mountain Power Pool Annual Training**

Attachments Omitted