

FFT Summaries

Kent Hills Wind LP (KHW) Audit October 13, 2021 to March 30, 2022

Entity	NBCRN	EUBVTN	Standard	Req	Compliance Issue	Risk Assessment	Mitigation Action
KHW	NBCR002	2022001	FAC-008-3	R2	On August 19, 2022, the Board issued KHW a Notice of Potential Violation stating that a reasonable basis exists for the finding of Potential Violation (PV) FAC-008-3 R2. FAC-008-3 R2 requires Generator Owners (GOs) to have a documented methodology for determining the emergency and seasonal Facility Ratings it had established for its main step-up transformers and for supporting the ambient condition assumptions it used to establish conductor ratings. KHW failed to have a documented methodology for determining the emergency and seasonal Facility Ratings it had established for its main step-up transformers and for supporting the ambient condition assumptions it used to establish conductor ratings.	The noncompliance started on July 1, 2016, and ended on February 5, 2026. While the long duration of the PV does increase the risk and KHW's documented Facility Rating Methodology (FRM) was insufficient, the conductor and transformer ratings calculations reviewed were generally based on technically sound principles. Actual loading on the transformers and conductors during the period of Potential Violation did not increase the risk of equipment failure above levels ultimately deemed acceptable by the equipment owner in its development of a compliant Facility Ratings Methodology. The risk was further reduced because the facility is a non-dispatchable intermittent source of generation. No harm is known to have occurred.	To mitigate this issue: 1) KHW brought their documented FRM into compliance with the standard and added a second approver. 2) KHW added references to appropriate corporate documents to their FRM. 3) KHW modified their corporate Facility Ratings governance document to include performance of field walkdowns to verify facility ratings. 4) KHW established version control on documentation as well as a requirement for review of facility ratings by a second party. 5) KHW modified their FRM document to include facility walkdowns, version history, identification of the reviewer, and reference to corporate facilities rating methodology guidance. 6) KHW drafted and distributed a lessons learned email to relevant personnel

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							at KHW and their affiliates.
KHW	NBCR002	2022002	FAC-008-3	R6	On August 19, 2022, the Board issued KHW a Notice of Potential Violation stating that a reasonable basis exists for the finding of Potential Violation (PV) FAC-008-3 R6. FAC-008-3 R2 requires Generator Owners (GOs) to have Facility Ratings that are accurate and consistent with their Facility Ratings methodology and documentation. KHW documented Facility Ratings consisted of several iterations of a spreadsheet containing Equipment Ratings for various pieces of equipment that comprise its wind farm Facilities. However, the various iterations spreadsheet contained inaccuracies and inconsistencies.	The noncompliance started on July 1, 2016, and ended on February 5, 2026. While the long duration of the PV does increase the risk, the risk was reduced because the generation associated with the issues is a non-dispatchable intermittent source and because, notwithstanding the inaccuracies and inconsistencies found during the audit, KHW's corrected and revised Facility Ratings exceed the manufacturer nameplate ratings. These increased ratings were adopted without requiring the replacement or modification of equipment, so the actual loading on the transformers during the period of Potential Violation did not increase the risk of equipment failure above levels ultimately deemed acceptable by KHW in its development of compliant Facility Ratings. Additionally, the KHW's transformers have alarming and tripping based on temperature thresholds. No harm is known to have occurred.	To mitigate this issue: 1) KHW corrected the Facilities Ratings to add an emergency rating for transformer T1 and T2 at the facility. 2) KHW distributed the revised ratings to the relevant TransAlta Personnel. 3) KHW modified Facilities Ratings to add a version history tab, also add a "reviewed by" column I the version history tab to prompt a second person to review changes. 4) KHW included a FAC-008 R6 periodic reminder in the new NERC work flow tool Artifact alerting personnel to review ratings. 5) KHW drafted a FAC-008 lessons learned specific to this audit finding. 6) KHW distributed the FAC-008 lessons learned relevant personnel in all areas of the fleet to alert them of the learnings from the Kent Hills Audit related

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							to facility ratings.