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PROJECT NO. 27706

REPORTS OF THE ELECTRIC §
RELIABILITY COUNCIL OF TEXAS §

PUBLIC UTILITY COMMISSION
OF TEXAS

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ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.'S
NOTICE OF VIOLATION OF ERCOT PROTOCOLS

Electric Reliability Council of Texas, Inc. (ERCOT) hereby notifies the Public Utility Commission of Texas (Commission) of violations of the ERCOT Protocols, as set forth herein.

I. Erroneous Upload of Unredacted Stability Study

On July 5, 2019, an ERCOT contractor erroneously uploaded a confidential version of a Full Interconnection Study (FIS) stability study related to a Generation Interconnection or Change Request (GINR) to the ERCOT Market Information System (MIS) Secure Area. The MIS Secure Area is only available to registered Market Participants (MPs) through a Digital Certificate. The confidential version of the FIS stability study contained sensitive information deemed confidential under ERCOT Planning Guide Section 5.4.8(5)—namely, information regarding contingencies that could cause instability on the ERCOT System. Contingency information about the ERCOT System is restricted to ERCOT staff and Transmission and Distribution Service Providers (TDSPs) that have signed confidentiality agreements pursuant to ERCOT Protocol Section 1.3.6(g). The confidential FIS stability study also contained “Protected Information” under ERCOT Protocol Section 1.3.1.1(1)(l) to the extent it included confidential information related to the GINR.

ERCOT staff discovered this error on July 8, 2019, and immediately removed the unredacted FIS stability study from the MIS Secure Area. ERCOT determined that three MPs downloaded the unredacted FIS stability study from the MIS Secure Area during the time it was available on the site, and that these three MPs should not have had access to this confidential

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version of the study.¹ ERCOT contacted the three MPs on July 9, 2019, and requested that they delete all copies of the unredacted FIS stability study from their systems, confirm the deletion to ERCOT, and not disclose the information contained in the unredacted FIS stability study to any other person or entity. Each MP responded and confirmed to ERCOT that they had deleted the information from their systems. Further, ERCOT informed the Interconnecting Entity (IE) whose GINR was the subject of the unredacted FIS stability study (and who was one of the three MPs that downloaded the information) that two other MPs accessed the unredacted FIS stability study, which may have contained confidential information related to the IE's generation project.²

ERCOT has controls and procedures in place so that electronic files are properly labeled and stored in a manner that ensures confidential information is not improperly uploaded to the ERCOT MIS; however, these procedures were not followed in this case. Accordingly, in light of this incident, ERCOT conducted additional training with the staff responsible for adding FIS files to the ERCOT MIS regarding the procedures that must be followed when uploading documents. Further, ERCOT specifically counseled the individual who failed to follow existing procedures when uploading the document at issue.

II. Inadvertent Disclosure of Confidential GINR Screening Study

On July 31, 2019, an Interconnecting Entity (IE) was given access to another IE's confidential GINR screening study. This error occurred when an ERCOT employee uploaded the incorrect screening study to the Resource Integration & On-going Operations (RIOO) system, which allowed the IE to view confidential information related to another IE's generation interconnection project. More specifically, the improperly disclosed screening study contained

¹ That is, none of the three MPs that accessed the file were TDSPs permitted to view the information.

² The IE was permitted to view its own confidential information related to its GINR, but it should not have been able to access the contingency information that was also included in the file erroneously uploaded to the MIS Secure Area.

“Protected Information” under ERCOT Protocol Section 1.3.1.1(1)(l) to the extent it included confidential information related to a GINR. Further, ERCOT Planning Guide Section 5.4.1(3) prohibits ERCOT from publicly releasing information related to a GINR screening study when that information is not otherwise publicly available.

ERCOT staff were alerted to this inadvertent disclosure by the IE who was allowed to view the incorrect screening study. ERCOT immediately requested that the IE delete the file from its systems and confirm that deletion to ERCOT. Once the IE confirmed it had deleted the file, ERCOT informed the IE whose confidential information was inadvertently disclosed about the incident, including the steps taken to remediate the error.

In response to this incident, the ERCOT employee who uploaded the incorrect screening study was counseled about proper procedures to ensure that this type of incident does not recur. Further training is also planned for the employees in the department charged with uploading this type of confidential information to the RIOO system.

III. Omission of Zero-Impedance Branch Transmission Line Information from State Estimator 60-Day Delayed Transmission Line Flows Report

ERCOT Protocol Section 6.5.7.1.13(5)(a) provides that ERCOT “shall” post on the MIS Secure Area hourly “transmission line flows and voltages” from the State Estimator, excluding transmission line flows and voltages for Private Use Networks, sixty days after the applicable Operating Day. ERCOT publishes this information in the State Estimator 60-Day Delayed Transmission Line Flows Report (Report), which is posted in the MIS Secure Area. It was recently brought to ERCOT’s attention by a Market Participant that this Report does not include hourly transmission line flows and voltages for zero-impedance branch (ZBR) transmission lines. Upon review, ERCOT has determined that it has never posted information for ZBR lines as part of this

Report. This omission is an inadvertent error and likely resulted from the fact ERCOT stores ZBR line information separately from other transmission line information.

Because ERCOT Protocol Section 6.5.7.1.13(5)(a) does not expressly exclude ZBR lines from the “transmission line” information that must be posted in the MIS Secure Area, ERCOT has determined that its omission of information for ZBR lines from the Report is contrary to the requirements of ERCOT Protocol Section 6.5.7.1.13(5)(a). Accordingly, ERCOT is implementing a software change so that ZBR line data will be included in future Reports posted in the MIS Secure Area. ERCOT expects this software update to be complete and implemented by mid-October 2019.

CONCLUSION

ERCOT takes its responsibilities under the ERCOT Protocols seriously and appreciates the Commission’s understanding in overseeing ERCOT’s administration of these requirements. ERCOT is prepared to discuss these matters in further detail at the Commission’s request.

Respectfully submitted,



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