

Violation Risk Factor and Violation Severity Level Justifications

2021-06 Modifications to IRO-010 and TOP-003

This document provides the standard drafting team's (SDT's) justification for assignment of violation risk factors (VRFs) and violation severity levels (VSLs) for each requirement in [Project Number and Name or Standard Number]. Each requirement is assigned a VRF and a VSL. These elements support the determination of an initial value range for the Base Penalty Amount regarding violations of requirements in FERC-approved Reliability Standards, as defined in the Electric Reliability Organizations (ERO) Sanction Guidelines. The SDT applied the following NERC criteria and FERC Guidelines when developing the VRFs and VSLs for the requirements.

NERC Criteria for Violation Risk Factors

High Risk Requirement

A requirement that, if violated, could directly cause or contribute to Bulk Electric System instability, separation, or a cascading sequence of failures, or could place the Bulk Electric System at an unacceptable risk of instability, separation, or cascading failures; or, a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to Bulk Electric System instability, separation, or a cascading sequence of failures, or could place the Bulk Electric System at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition.

Medium Risk Requirement

A requirement that, if violated, could directly affect the electrical state or the capability of the Bulk Electric System, or the ability to effectively monitor and control the Bulk Electric System. However, violation of a medium risk requirement is unlikely to lead to Bulk Electric System instability, separation, or cascading failures; or, a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor, control, or restore the Bulk Electric System. However, violation of a medium risk requirement is unlikely, under emergency, abnormal, or restoration conditions anticipated by the preparations, to lead to Bulk Electric System instability, separation, or cascading failures, nor to hinder restoration to a normal condition.

Lower Risk Requirement

A requirement that is administrative in nature and a requirement that, if violated, would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor and control the Bulk Electric System; or, a requirement that is administrative in nature and a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor, control, or restore the Bulk Electric System.

FERC Guidelines for Violation Risk Factors

Guideline (1) – Consistency with the Conclusions of the Final Blackout Report

FERC seeks to ensure that VRFs assigned to Requirements of Reliability Standards in these identified areas appropriately reflect their historical critical impact on the reliability of the Bulk-Power System. In the VSL Order, FERC listed critical areas (from the Final Blackout Report) where violations could severely affect the reliability of the Bulk-Power System:

- Emergency operations
- Vegetation management
- Operator personnel training
- Protection systems and their coordination
- Operating tools and backup facilities
- Reactive power and voltage control
- System modeling and data exchange
- Communication protocol and facilities
- Requirements to determine equipment ratings
- Synchronized data recorders
- Clearer criteria for operationally critical facilities
- Appropriate use of transmission loading relief.

Guideline (2) – Consistency within a Reliability Standard

FERC expects a rational connection between the sub-Requirement VRF assignments and the main Requirement VRF assignment.

Guideline (3) – Consistency among Reliability Standards

FERC expects the assignment of VRFs corresponding to Requirements that address similar reliability goals in different Reliability Standards would be treated comparably.

Guideline (4) – Consistency with NERC’s Definition of the Violation Risk Factor Level

Guideline (4) was developed to evaluate whether the assignment of a particular VRF level conforms to NERC’s definition of that risk level.

Guideline (5) – Treatment of Requirements that Co-mingle More Than One Obligation

Where a single Requirement co-mingles a higher risk reliability objective and a lesser risk reliability objective, the VRF assignment for such Requirements must not be watered down to reflect the lower risk level associated with the less important objective of the Reliability Standard.

NERC Criteria for Violation Severity Levels

VSLs define the degree to which compliance with a requirement was not achieved. Each requirement must have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple “degrees” of noncompliant performance and may have only one, two, or three VSLs.

VSLs should be based on NERC’s overarching criteria shown in the table below:

Lower VSL	Moderate VSL	High VSL	Severe VSL
The performance or product measured almost meets the full intent of the requirement.	The performance or product measured meets the majority of the intent of the requirement.	The performance or product measured does not meet the majority of the intent of the requirement, but does meet some of the intent.	The performance or product measured does not substantively meet the intent of the requirement.

FERC Order of Violation Severity Levels

The FERC VSL guidelines are presented below, followed by an analysis of whether the VSLs proposed for each requirement in the standard meet the FERC Guidelines for assessing VSLs:

Guideline (1) – Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance

Compare the VSLs to any prior levels of non-compliance and avoid significant changes that may encourage a lower level of compliance than was required when levels of non-compliance were used.

Guideline (2) – Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties

A violation of a “binary” type requirement must be a “Severe” VSL.

Do not use ambiguous terms such as “minor” and “significant” to describe noncompliant performance.

Guideline (3) – Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement

VSLs should not expand on what is required in the requirement.

Guideline (4) – Violation Severity Level Assignment Should Be Based on a Single Violation, Not on a Cumulative Number of Violations

Unless otherwise stated in the requirement, each instance of non-compliance with a requirement is a separate violation. Section 4 of the Sanction Guidelines states that assessing penalties on a per violation per day basis is the “default” for penalty calculations.

IRO-010-5

VRF Justification for IRO-010-5, Requirement R1

The VRF did not change from the previously FERC approved IRO-010-5 Reliability Standard. The modifications made to R1 were administrative in nature therefore the VRF remained a low.

VSL Justification for IRO-010-5, Requirement R1

Please refer to the VSL table located below.

VRF Justification for IRO-010-5, Requirement R2

The VRF did not change from the previously FERC approved IRO-010-5 Reliability Standard. The modifications made to R2 were administrative in nature therefore the VRF remained a low.

VSL Justification for IRO-010-5, Requirement R2

Please refer to the VSL table located below.

VRF Justification for IRO-010-5, Requirement R3

The VRF did not change from the previously FERC approved IRO-010-5 Reliability Standard. The modifications made to Requirement R3 directly effect the electrical state or capability of the Bulk Electric system therefore the VRF remained a medium.

VSL Justification for IRO-010-5, Requirement R3

Please refer to the VSL table located below.

VSL Justifications for IRO-010-5, Requirement 1

Lower	Moderate	High	Severe
<p>The Reliability Coordinator did not include two or fewer of the parts (Part 1.1 through Part 1.8) of the documented specification for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.</p>	<p>The Reliability Coordinator did not include three to four of the parts (Part 1.1 through Part 1.8) of the documented specification for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.</p>	<p>The Reliability Coordinator did not include five to seven of the parts (Part 1.1 through Part 1.8) of the documented specification for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.</p>	<p>The Reliability Coordinator did not include any of the parts (Part 1.1 through Part 1.8) of the documented specification for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. OR, The Reliability Coordinator did not have a documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.</p>

VSL Justifications for IRO-010-5, Requirement 1

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The requirement was modified by adding addition sub requirements to requirement R1. The purposed VSL was modified to reflect the addition sub requirement. It does not have an unintended consequence of lowering the level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of</p>	<p>The requirement is for the responsible entity to maintain a document speciation for the data and information. Guideline 2a is no applicable as these VSLs are no binary. The VSLs do not contain ambiguous language.</p>

VSL Justifications for IRO-010-5, Requirement 1

<p>Penalties</p> <p><u>Guideline 2a</u>: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The purposed VSL uses the same terminology as used in the associated requirement therefore it is consistent with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

VSL Justifications for IRO-010-5, Requirement 2			
Lower	Moderate	High	Severe
The Reliability Coordinator did not distribute its specification as developed in Requirement R1 to one entity, or 5% or less of the entities, whichever is greater, that have data and information required by the Reliability Coordinator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	The Reliability Coordinator did not distribute its specification as developed in Requirement R1 to two entities, or more than 5% and less than or equal to 10% of the reliability entities, whichever is greater, that have data and information required by the Reliability Coordinator's Operational Planning Analyses, and Real-time monitoring, and Real-time Assessments.	The Reliability Coordinator did not distribute its specification as developed in Requirement R1 to three entities, or more than 10% and less than or equal to 15% of the reliability entities, whichever is greater, that have data and information required by the Reliability Coordinator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	The Reliability Coordinator did not distribute its specification as developed in Requirement R1 to four or more entities, or more than 15% of the entities, whichever is greater, that have data and information required by the Reliability Coordinator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.

VSL Justifications for IRO-010-5, Requirement 2	
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The requirement was modified by add language for consistency purposes to requirement R2. The proposed VSL was modified to reflect the language. It does not have an unintended consequence of lowering the level of compliance.
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a</u> : The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not	The requirement is for the responsible entity to distribute its data and information specification to entities that have data required. Guideline 2a is no applicable as these VSLs are no binary. The VSLs do not contain ambiguous language.

VSL Justifications for IRO-010-5, Requirement 2

<p>Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	
<p>FERC VSL G3</p> <p>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The purposed VSL uses the same terminology as used in the associated requirement therefore it is consistent with the requirement.</p>
<p>FERC VSL G4</p> <p>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

VSL Justifications for IRO-010-5, Requirement 3			
Lower	Moderate	High	Severe
The responsible entity receiving a specification in Requirement R2 satisfied the documented specifications but failed to use one of the criteria in Requirement R1 Parts 1.5 – 1.8.	The responsible entity receiving a specification in Requirement R2 satisfied the documented specifications but failed to use two of the criteria in Requirement R1 Parts 1.5 – 1.8.	The responsible entity receiving a specification in Requirement R2 satisfied the documented specifications but failed to use three or more of the criteria in Requirement R1 Parts 1.5 – 1.8.	The responsible entity receiving a specification in Requirement R2 did not satisfy the documented specifications.

VSL Justifications for IRO-010-5, Requirement 3	
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The requirement was modified by deleting language for consistency purposes to requirement R3. The proposed VSL was modified to reflect the language. It does not have an unintended consequence of lowering the level of compliance.
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a</u> : The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b</u> : Violation Severity Level Assignments that Contain Ambiguous Language	The requirement is for the responsible entity receiving a specification in Requirement R3 shall satisfy the documented specifications. Guideline 2a is no applicable as these VSLs are no binary. The VSLs do not contain ambiguous language.
FERC VSL G3	The proposed VSL uses the same terminology as used in the associated requirement therefore it is consistent

VSL Justifications for IRO-010-5, Requirement 3

<p>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

TOP-003-6

VRF Justification for TOP-003-6, Requirement R1

The VRF did not change from the previously FERC approved TOP-003-6 Reliability Standard. The modifications made to R1 were administrative in nature therefore the VRF remained a low.

VSL Justification for TOP-003-6, Requirement R1

Please refer to the VSL table located below.

VRF Justification for TOP-003-6, Requirement R2

The VRF did not change from the previously FERC approved TOP-003-6 Reliability Standard. The modifications made to R2 were administrative in nature therefore the VRF remained a low.

VSL Justification for TOP-003-6, Requirement R2

Please refer to the VSL table located below.

VRF Justification for TOP-003-6, Requirement R3

The VRF did not change from the previously FERC approved TOP-003-6 Reliability Standard. The modifications made to R1 were administrative in nature therefore the VRF remained a low.

VSL Justification for TOP-003-6, Requirement R3

Please refer to the VSL table located below.

VRF Justification for TOP-003-6, Requirement R4

The VRF did not change from the previously FERC approved TOP-003-6 Reliability Standard. The modifications made to R1 were administrative in nature therefore the VRF remained a low.

VSL Justification for TOP-003-6, Requirement R4

Please refer to the VSL table located below.

VRF Justification for TOP-003-6, Requirement R5

The VRF did not change from the previously FERC approved TOP-003-6 Reliability Standard. The modifications made to Requirement R3 directly effect the electrical state or capability of the Bulk Electric system therefore the VRF remained a medium.

VSL Justification for TOP-003-6, Requirement R5

Please refer to the VSL table located below.

VSL Justifications for TOP-003-6, Requirement 1			
Lower	Moderate	High	Severe
The Transmission Operator did not include two or fewer of the parts (Part 1.1 through Part 1.8) of the documented specification for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	The Transmission Operator did not include three to four of the parts (Part 1.1 through Part 1.8) of the documented specification for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	The Transmission Operator did not include five to seven of the parts (Part 1.1 through Part 1.8) of the documented specification for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	The Transmission Operator did not include any of the parts (Part 1.1 through Part 1.8) of the documented specification for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. OR, The Transmission Operator did not have a documented specification for the data necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.

VSL Justifications for TOP-003-6, Requirement 1	
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The requirement was modified by adding additional sub requirements to requirement R1. The proposed VSL was modified to reflect the additional sub requirement. It does not have an unintended consequence of lowering the level of compliance.
FERC VSL G2	The requirement is for the responsible entity to maintain a documented specification for the data and information.

VSL Justifications for TOP-003-6, Requirement 1

<p>Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p><u>Guideline 2a</u>: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a is no applicable as these VSLs are no binary. The VSLs do not contain ambiguous language.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The purposed VSL uses the same terminology as used in the associated requirement therefore it is consistent with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

VSL Justifications for TOP-003-6, Requirement 2			
Lower	Moderate	High	Severe
The Balancing Authority did not include two or fewer of the parts (Part 2.1 through Part 2.8) of the documented specification for the data and information necessary for it to perform its analysis functions and Real-time monitoring.	The Balancing Authority did not include three to four of the parts (Part 2.1 through Part 2.8) of the documented specification for the data and information necessary for it to perform its analysis functions and Real-time monitoring.	The Balancing Authority did not include five to seven of the parts (Part 2.1 through Part 2.8) of the documented specification for the data and information necessary for it to perform its analysis functions and Real-time monitoring.	The Balancing Authority did not include any of the parts (Part 2.1 through Part 2.8) of the documented specification for the data and information necessary for it to perform its analysis functions and Real-time monitoring. OR, The Balancing Authority did not have a documented specification for the data necessary for it to perform its analysis functions and Real-time monitoring.

VSL Justifications for TOP-003-6 Requirement 2	
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The requirement was modified by adding additional language to requirement R2. The proposed VSL was modified to reflect the additional language. It does not have an unintended consequence of lowering the level of compliance.
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a</u> : The Single Violation Severity Level Assignment Category	The requirement is for the responsible entity to maintain a document specification for the data and information. Guideline 2a is not applicable as these VSLs are not binary. The VSLs do not contain ambiguous language.

VSL Justifications for TOP-003-6 Requirement 2

<p>for "Binary" Requirements Is Not Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The purposed VSL uses the same terminology as used in the associated requirement therefore it is consistent with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

VSL Justifications for TOP-003-6, Requirement 3

Lower	Moderate	High	Severe
The Transmission Operator did not distribute its specification to one entity, or 5% or less of the entities, whichever is greater, that have data and information required by the Transmission Operator’s Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	The Transmission Operator did not distribute its specification to two entities, or more than 5% and less than or equal to 10% of the reliability entities, whichever is greater, that have data and information required by the Transmission Operator’s Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	The Transmission Operator did not distribute its specification to three entities, or more than 10% and less than or equal to 15% of the reliability entities, whichever is greater, that have data and information required by the Transmission Operator’s Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	The Transmission Operator did not distribute its specification to four or more entities, or more than 15% of the entities that have data and information required by the Transmission Operator’s Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.

VSL Justifications for TOP-003-6, Requirement 3

FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The requirement was modified by add language for consistency purposes to requirement R3. The proposed VSL was modified to reflect the language. It does not have an unintended consequence of lowering the level of compliance.
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a</u> : The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not	The requirement is for the responsible entity to distribute its data and information specification to entities that have data required. Guideline 2a is no applicable as these VSLs are no binary. The VSLs do not contain ambiguous language.

VSL Justifications for TOP-003-6, Requirement 3

<p>Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	
<p>FERC VSL G3</p> <p>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The purposed VSL uses the same terminology as used in the associated requirement therefore it is consistent with the requirement.</p>
<p>FERC VSL G4</p> <p>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

VSL Justifications for TOP-003-6, Requirement 4

Lower	Moderate	High	Severe
The Balancing Authority did not distribute its data specification to one entity, or 5% or less of the entities, whichever is greater, that have data and information required by the Balancing Authority’s analysis functions and Real-time monitoring.	The Balancing Authority did not distribute its data specification to two entities, or more than 5% and less than or equal to 10% of the entities, whichever is greater, that have data and information required by the Balancing Authority’s analysis functions and Real-time monitoring.	The Balancing Authority did not distribute its data specification to three entities, or more than 10% and less than or equal to 15% of the entities, whichever is greater, that have data and information required by the Balancing Authority’s analysis functions and Real-time monitoring.	The Balancing Authority did not distribute its data specification to four or more entities, or more than 15% of the entities that have Data and information required by the Balancing Authority’s analysis functions and Real-time monitoring.

VSL Justifications for TOP-003-6, Requirement 4

FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The requirement was modified by adding language for consistency purposes to requirement R4. The proposed VSL was modified to reflect the language. It does not have an unintended consequence of lowering the level of compliance.
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a</u> : The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b</u> : Violation Severity Level Assignments that Contain	The requirement is for the responsible entity to distribute its data and information specification to entities that have data required. Guideline 2a is not applicable as these VSLs are not binary. The VSLs do not contain ambiguous language.

VSL Justifications for TOP-003-6, Requirement 4

Ambiguous Language	
FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	The purposed VSL uses the same terminology as used in the associated requirement therefore it is consistent with the requirement.
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	Each VSL is based on a single violation and not cumulative violations.

VSL Justifications for TOP-003-6, Requirement 5

Lower	Moderate	High	Severe
The responsible entity receiving a specification in Requirement R3 or R4 satisfied the specification but failed to use one of the criteria in Requirement R1 (Parts 1.5 – 1.8) or Requirement R2 (Parts 2.5 – 2.8).	The responsible entity receiving a specification in Requirement R3 or R4 satisfied the specification but failed to use two of the criteria in Requirement R1 (Parts 1.5 – 1.8) or Requirement R2 (Parts 2.5 – 2.8).	The responsible entity receiving a specification in Requirement R3 or R4 satisfied the specification but failed to use three or more of the criteria in Requirement R1 (Parts 1.5 – 1.8) or Requirement R2 (Parts 2.5 – 2.8).	The responsible entity receiving a specification in Requirement R3 or R4 did not satisfy the documented specification.

VSL Justifications for TOP-003-6, Requirement 5

FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The requirement was modified by deleting language for consistency purposes to requirement R5. The proposed VSL was modified to reflect the language. It does not have an unintended consequence of lowering the level of compliance.
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a</u> : The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b</u> : Violation Severity Level Assignments that Contain Ambiguous Language	The requirement is for the responsible entity receiving a specification in Requirement R5 shall satisfy the documented specifications. Guideline 2a is no applicable as these VSLs are no binary. The VSLs do not contain ambiguous language.

VSL Justifications for TOP-003-6, Requirement 5

<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The purposed VSL uses the same terminology as used in the associated requirement therefore it is consistent with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>