

## Project 2007-11 Disturbance Monitoring

### VRF and VSL Justifications

This document provides the drafting team's justification for assignment of violation risk factors (VRFs) and violation severity levels (VSLs) for each requirement in PRC-002-2 – Disturbance Monitoring and Reporting Requirements.

Each primary requirement is assigned a VRF and a set of one or more VSLs. 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 by the ERO Sanctions Guidelines.

The Disturbance Monitoring and Reporting Requirements Standard Drafting Team applied the following NERC criteria and FERC Guidelines when proposing VRFs and VSLs for the requirements under this project:

### NERC Criteria –VRFs

#### 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.

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### **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. A planning requirement that is administrative in nature.

### **FERC VRF Guidelines**

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

The Commission seeks to ensure that Violation Risk Factors assigned to Requirements of Reliability Standards in these identified areas appropriately reflect their historical critical impact on 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**

The Commission expects a rational connection between the sub-Requirement Violation Risk Factor assignments and the main Requirement Violation Risk Factor assignment.

#### **Guideline (3) – Consistency among Reliability Standards**

The Commission expects the assignment of Violation Risk Factors 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 Violation Risk Factor level conforms to NERC's definition of that risk level.

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

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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.

VRF and VSL Justifications – PRC-002-2, R1	
Proposed VRF	Lower
NERC VRF Discussion	R1 is a requirement in a long-term 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 BES, or the ability to effectively monitor, control, or restore the BES.
FERC VRF G1 Discussion	<b>Guideline 1- Consistency w/ Blackout Report</b> R1 establishes the list of Sequence of Events Recordings and Fault Recordings that is consistent with FERC guideline G1, Recommendation 12 of the Blackout Report.
FERC VRF G2 Discussion	<b>Guideline 2- Consistency within a Reliability Standard</b> The requirement has parts that are of equal importance; only one VRF was assigned so there is no conflict.
FERC VRF G3 Discussion	<b>Guideline 3- Consistency among Reliability Standards</b> This requirement calls for establishing a list of BES bus locations for Sequence of Events Recording and Fault Recording using the selection procedure in Attachment 1. The team could not identify other continent-wide reliability standards of the same nature.
FERC VRF G4 Discussion	<b>Guideline 4- Consistency with NERC Definitions of VRFs</b> Failure to establish the list of BES bus locations for Sequence of Events Recording and Fault Recording could not directly affect the electrical state or capability of the BES, or the ability to effectively monitor and control the BES. Violation of the requirement will not lead to bulk electric system instability, separation, or cascading failures. The VRF for this requirement is “Lower” which is consistent with NERC guidelines for similar requirements.
FERC VRF G5 Discussion	<b>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</b> R1 contains only one objective which is to establish a list of BES bus locations for Sequence of Events Recording and Fault Recording and to review the list every 5 calendar years. Since the requirement has only one objective, only one VRF was assigned.

VRF and VSL Justifications – PRC-002-2, R1	
Proposed Lower VSL	<p>The Transmission Owner identified the bus locations as directed by Requirement R1, Part 1.1 for more than 80% but less than 100% of the required bus locations.</p> <p style="text-align: center;">OR</p> <p>The Transmission Owner assessed the bus locations as directed by Requirement R1, Part 1.2 but was late by 30 calendar days or less.</p>
Proposed Moderate VSL	<p>The Transmission Owner identified the bus locations as directed by Requirement R1, Part 1.1 for more than 70% but less than or equal to 80% of the required bus locations.</p> <p style="text-align: center;">OR</p> <p>The Transmission Owner assessed the bus locations as directed by Requirement R1, Part 1.2 but was late by greater than 30 calendar days and less than or equal to 60 calendar days.</p>
Proposed High VSL	<p>The Transmission Owner identified the bus locations as directed by Requirement R1, Part 1.1 for more than 60% but less than or equal to 70% of the required bus locations.</p> <p style="text-align: center;">OR</p> <p>The Transmission Owner assessed the bus locations as directed by Requirement R1, Part 1.2 but was late by greater than 60 calendar days and less than or equal to 90 calendar days.</p>
Proposed Severe VSL	<p>The Transmission Owner identified the bus locations as directed by Requirement R1, Part 1.1 for less than or equal to 60% of the required bus locations.</p> <p style="text-align: center;">OR</p> <p>The Transmission Owner assessed the bus locations as directed by Requirement R1, Part 1.2 but was late by greater than 90 calendar days.</p>
<p><b>FERC VSL G1</b> Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering</p>	<p>PRC-002-2 differs from PRC-002-1 (not enforceable) and PRC-018-1 (enforceable and will be retired upon approval of PRC-002-2) in that PRC-002-2 deals with Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording in order to adequately capture data for events analysis; and not equipment as referenced in the PRC-</p>

VRF and VSL Justifications – PRC-002-2, R1	
the Current Level of Compliance	002-1 and PRC-018-1. Therefore, the VSL’s cannot be compared between PRC-002-2 and PRC-018-1. The VSL’s for this requirement meet or exceed the current level of compliance.
<p><b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R1 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p><b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.
<p><b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	Proposed VSLs are based on a single violation and not a cumulative violation methodology.
<p><b>FERC VSL G5</b> Requirements where a single lapse in protection can compromise computer network security, i.e., the</p>	Non CIP

VRF and VSL Justifications – PRC-002-2, R1	
'weakest link' characteristic, should apply binary VSLs	
<b>FERC VSL G6</b> VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	Non CIP

VRF and VSL Justifications – PRC-002-2, R2	
Proposed VRF	Lower
NERC VRF Discussion	R2 is a requirement in a long-term 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 BES, or the ability to effectively monitor, control, or restore the BES.
FERC VRF G1 Discussion	<b>Guideline 1- Consistency w/ Blackout Report</b> R2 requires the Transmission Owner to notify the other affected owners to provide Sequence of Events Recordings and Fault Recordings at bus locations selected in Requirement R1. This is consistent with FERC guideline G1, Recommendation 12 of the Blackout Report.
FERC VRF G2 Discussion	<b>Guideline 2- Consistency within a Reliability Standard</b> This requirement does not have parts.
FERC VRF G3 Discussion	<b>Guideline 3- Consistency among Reliability Standards</b> This requirement calls for notifying the other affected owners to provide Sequence of Events Recordings and Fault Recordings at bus locations selected in Requirement R1. The team could not identify other continent-wide reliability standards of the same nature.
FERC VRF G4 Discussion	<b>Guideline 4- Consistency with NERC Definitions of VRFs</b> Failure to notify the owners of BES bus locations for Sequence of Events Recording and Fault Recording selected in R1 could not directly affect the electrical state or capability of the BES, or the ability to

VRF and VSL Justifications – PRC-002-2, R2	
	effectively monitor and control the BES. Violation of the requirement will not lead to bulk electric system instability, separation, or cascading failures. The VRF for this requirement is “Lower” which is consistent with NERC guidelines for similar requirements.
FERC VRF G5 Discussion	<b>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</b> R2 contains only one objective which is to notify the owners of BES bus locations for Sequence of Events Recording and Fault Recording selected in R1.
Proposed Lower VSL	The Transmission Owner as directed by Requirement R2 was late in notifying the owners by 10 calendar days or less.
Proposed Moderate VSL	The Transmission Owner as directed by Requirement R2 was late in notifying the owners by greater than 10 calendar days but less than or equal to 20 calendar days.
Proposed High VSL	The Transmission Owner as directed by Requirement R2 was late in notifying the owners by greater than 20 calendar days but less than or equal to 30 calendar days.
Proposed Severe VSL	The Transmission Owner as directed by Requirement R2 was late in notifying one or more owners by greater than 30 calendar days.
<b>FERC VSL G1</b> Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	PRC-002-2 differs from PRC-002-1 (not enforceable) and PRC-018-1 (enforceable and will be retired upon approval of PRC-002-2) in that PRC-002-2 deals with Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording in order to adequately capture data for events analysis; and not equipment as referenced in the PRC-002-1 and PRC-018-1. Therefore, the VSL’s cannot be compared between PRC-002-2 and PRC-018-1. The VSL’s for this requirement meet or exceed the current level of compliance.
<b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level	Guideline 2a: The VSL assignment for R2 is not binary.  Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.

VRF and VSL Justifications – PRC-002-2, R2	
Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	
<b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.
<b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	Proposed VSLs are based on a single violation and not a cumulative violation methodology.
<b>FERC VSL G5</b> Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs	Non CIP
<b>FERC VSL G6</b> VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	Non CIP



VRF and VSL Justifications – PRC-002-2, R3	
Proposed VRF	Lower
NERC VRF Discussion	R3 is a requirement in a long-term 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 BES, or the ability to effectively monitor, control, or restore the BES.
FERC VRF G1 Discussion	<b>Guideline 1- Consistency w/ Blackout Report</b> R3 provides criteria for Sequence of Events Recording which falls under Recommendation 12 of the Blackout Report and is consistent with FERC guideline G1.
FERC VRF G2 Discussion	<b>Guideline 2- Consistency within a Reliability Standard</b> This requirement does not have parts.
FERC VRF G3 Discussion	<b>Guideline 3- Consistency among Reliability Standards</b> This requirement establishes criteria for Sequence of Events Recording selected in R1, Attachment 1. The team could not identify other continent-wide reliability standards of the same nature.
FERC VRF G4 Discussion	<b>Guideline 4- Consistency with NERC Definitions of VRFs</b> Failure to establish criteria for Sequence of Events Recording could not directly affect the electrical state or capability of the BES, or the ability to effectively monitor and control the BES. Violation of the requirement will not lead to bulk electric system instability, separation, or cascading failures. The VRF for this requirement is “Lower” which is consistent with NERC guidelines for similar requirements.
FERC VRF G5 Discussion	<b>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</b> R3 contains only one objective which is to establish criteria for Sequence of Events Recording. Since the requirement has only one objective, only one VRF was assigned.
Proposed Lower VSL	Each Transmission or Generator Owner as directed by Requirement R3 implemented more than 75% but less than 100% of the total Sequence of Events Recording for circuit breaker position (open/close) for each of the circuit breakers at the bus locations as per Requirement R2.
Proposed Moderate VSL	Each Transmission or Generator Owner as directed by Requirement R3 implemented more than 50% but less than or equal to 75% of the

VRF and VSL Justifications – PRC-002-2, R3	
	total Sequence of Events Recording for circuit breaker position (open/close) for each of the circuit breakers at the bus locations as per Requirement R2.
Proposed High VSL	Each Transmission or Generator Owner as directed by Requirement R3 implemented more than 10% but less than or equal to 50% of the total Sequence of Events Recording for circuit breaker position (open/close) for each of the circuit breakers at the bus locations as per Requirement R2.
Proposed Severe VSL	Each Transmission or Generator Owner as directed by Requirement R3 implemented from 0% but less than or equal to 10% of the total Sequence of Events Recording for circuit breaker position (open/close) for each of the circuit breakers at the bus locations as per Requirement R2.
<p><b>FERC VSL G1</b> Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	PRC-002-2 differs from PRC-002-1 (not enforceable) and PRC-018-1 (enforceable and will be retired upon approval of PRC-002-2) in that PRC-002-2 deals with Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording in order to adequately capture data for events analysis; and not equipment as referenced in the PRC-002-1 and PRC-018-1. Therefore, the VSL’s cannot be compared between PRC-002-2 and PRC-018-1. The VSL’s for this requirement meet or exceed the current level of compliance.
<p><b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments</p>	<p>Guideline 2a: The VSL assignment is for R3 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>

VRF and VSL Justifications – PRC-002-2, R3	
that Contain Ambiguous Language	
<b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.
<b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	Proposed VSLs are based on a single violation and not a cumulative violation methodology.
<b>FERC VSL G5</b> Requirements where a single lapse in protection can compromise computer network security, i.e., the ‘weakest link’ characteristic, should apply binary VSLs	Non CIP
<b>FERC VSL G6</b> VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	Non CIP

VRF and VSL Justifications – PRC-002-2, R4	
<b>Proposed VRF</b>	<b>Lower</b>
NERC VRF Discussion	R4 is a requirement in a long-term planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely

VRF and VSL Justifications – PRC-002-2, R4	
	affect the electrical state or capability of the BES, or the ability to effectively monitor, control, or restore the BES.
FERC VRF G1 Discussion	<b>Guideline 1- Consistency w/ Blackout Report</b> R4 provides criteria for Fault Recordings which falls under Recommendation 12 of the Blackout Report and is consistent with FERC guideline G1.
FERC VRF G2 Discussion	<b>Guideline 2- Consistency within a Reliability Standard</b> The requirement has parts that are of equal importance; only one VRF was assigned so there is no conflict.
FERC VRF G3 Discussion	<b>Guideline 3- Consistency among Reliability Standards</b> This requirement establishes criteria for Fault Recording selected in R1, Attachment 1. The team could not identify other continent-wide reliability standards of the same nature.
FERC VRF G4 Discussion	<b>Guideline 4- Consistency with NERC Definitions of VRFs</b> Failure to establish criteria for Fault Recording could not directly affect the electrical state or capability of the BES, or the ability to effectively monitor and control the BES. Violation of the requirement will not lead to bulk electric system instability, separation, or cascading failures. The VRF for this requirement is “Lower” which is consistent with NERC guidelines for similar requirements.
FERC VRF G5 Discussion	<b>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</b> R4 contains only one objective which is to establish criteria for Fault Recording. Since the requirement has only one objective, only one VRF was assigned.
Proposed Lower VSL	The Transmission Owner or Generator Owner implemented Fault Recording as directed by Requirement R4, Parts 4.1 and 4.2 that covers more than 75% but less than 100% of the total set of required electrical quantities, which is the product of the total number of monitored BES Elements and the number of specified electrical quantities per each Element.
Proposed Moderate VSL	The Transmission Owner or Generator Owner implemented Fault Recording as directed by Requirement R4, Parts 4.1 and 4.2 that covers more than 50% but less than or equal to 75% of the total set of required electrical quantities, which is the product of the total number of monitored BES Elements and the number of specified electrical quantities per each Element.

VRF and VSL Justifications – PRC-002-2, R4	
Proposed High VSL	The Transmission Owner or Generator Owner implemented Fault Recording as directed by Requirement R4, Parts 4.1 and 4.2 that covers more than 10% but less than or equal to 50% of the total set of required electrical quantities, which is the product of the total number of monitored BES Elements and the number of specified electrical quantities per each Element.
Proposed Severe VSL	The Transmission Owner or Generator Owner implemented Fault Recording as directed by Requirement R4, Parts 4.1 and 4.2 that covers more than 0% but less than or equal to 10% of the total set of required electrical quantities, which is the product of the total number of monitored BES Elements and the number of specified electrical quantities per each Element.
<b>FERC VSL G1</b> Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	PRC-002-2 differs from PRC-002-1 (not enforceable) and PRC-018-1 (enforceable and will be retired upon approval of PRC-002-2) in that PRC-002-2 deals with Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording in order to adequately capture data for events analysis; and not equipment as referenced in the PRC-002-1 and PRC-018-1. Therefore, the VSL's cannot be compared between PRC-002-2 and PRC-018-1. The VSL's for this requirement meet or exceed the current level of compliance.
<b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties  Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent  Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 2a: The VSL assignment is for R4 is not binary.  Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.
<b>FERC VSL G3</b>	The proposed VSL uses similar terminology to that used in the

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VRF and VSL Justifications – PRC-002-2, R4	
Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	associated requirement, and is therefore consistent with the requirement.
<b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	Proposed VSLs are based on a single violation and not a cumulative violation methodology.
<b>FERC VSL G5</b> Requirements where a single lapse in protection can compromise computer network security, i.e., the ‘weakest link’ characteristic, should apply binary VSLs	Non CIP
<b>FERC VSL G6</b> VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	Non CIP

VRF and VSL Justifications – PRC-002-2, R5	
<b>Proposed VRF</b>	<b>Lower</b>
NERC VRF Discussion	R5 is a requirement in a long-term planning time frame that, if violated, would not, under the emergency, abnormal, or restorative

VRF and VSL Justifications – PRC-002-2, R5	
	conditions anticipated by the preparations, be expected to adversely affect the electrical state of capability of the BES, or the ability to effectively monitor, control, or restore the BES.
FERC VRF G1 Discussion	<b>Guideline 1- Consistency w/ Blackout Report</b> R5 provides criteria for Fault Recordings which falls under Recommendation 12 of the Blackout Report and is consistent with FERC guideline G1.
FERC VRF G2 Discussion	<b>Guideline 2- Consistency within a Reliability Standard</b> The requirement has parts that are of equal importance; only one VRF was assigned so there is no conflict.
FERC VRF G3 Discussion	<b>Guideline 3- Consistency among Reliability Standards</b> This requirement establishes criteria for Fault Recordings selected in R1, Attachment 1. The team could not identify other continent-wide reliability standards of the same nature.
FERC VRF G4 Discussion	<b>Guideline 4- Consistency with NERC Definitions of VRFs</b> Failure to establish criteria for Fault Recording could not directly affect the electrical state or capability of the BES, or the ability to effectively monitor and control the BES. Violation of the requirement will not lead to bulk electric system instability, separation, or cascading failures. The VRF for this requirement is “Lower” which is consistent with NERC guidelines for similar requirements.
FERC VRF G5 Discussion	<b>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</b> R5 contains only one objective which is to establish criteria for Fault Recording. Since the requirement has only one objective, only one VRF was assigned.
Proposed Lower VSL	The Transmission Owner or Generator Owner implemented Fault Recording that meets more than 75% but less than 100% of the total recording properties as specified in Requirement R5.
Proposed Moderate VSL	The Transmission Owner or Generator Owner implemented Fault Recording that meets more than 50% but less than or equal to 75% of the total recording properties as specified in Requirement R5.
Proposed High VSL	The Transmission Owner or Generator Owner implemented Fault Recording that meets more than 10% but less than or equal to 50% of the total recording properties as specified in Requirement R5.

VRF and VSL Justifications – PRC-002-2, R5	
Proposed Severe VSL	The Transmission Owner or Generator Owner implemented Fault Recording that meets more than 0% but less than or equal to 10% of the total recording properties as specified in Requirement R5.
<b>FERC VSL G1</b> Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	PRC-002-2 differs from PRC-002-1 (not enforceable) and PRC-018-1 (enforceable and will be retired upon approval of PRC-002-2) in that PRC-002-2 deals with Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording in order to adequately capture data for events analysis; and not equipment as referenced in the PRC-002-1 and PRC-018-1. Therefore, the VSL's cannot be compared between PRC-002-2 and PRC-018-1. The VSL's for this requirement meet or exceed the current level of compliance.
<b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties  Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent  Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 2a: The VSL assignment is for R5 is not binary.  Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.
<b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.
<b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based	Proposed VSLs are based on a single violation and not a cumulative violation methodology.



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VRF and VSL Justifications – PRC-002-2, R5	
on A Single Violation, Not on A Cumulative Number of Violations	
<b>FERC VSL G5</b> Requirements where a single lapse in protection can compromise computer network security, i.e., the ‘weakest link’ characteristic, should apply binary VSLs	Non CIP
<b>FERC VSL G6</b> VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	Non CIP

VRF and VSL Justifications – PRC-002-2, R6	
Proposed VRF	Lower
NERC VRF Discussion	R6 is a requirement in a long-term 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 of capability of the BES, or the ability to effectively monitor, control, or restore the BES.
FERC VRF G1 Discussion	<b>Guideline 1- Consistency w/ Blackout Report</b> R6 establishes the list of Dynamic Disturbance Recordings that is consistent with FERC guideline G1, Recommendation 12 of the Blackout Report.

VRF and VSL Justifications – PRC-002-2, R6	
FERC VRF G2 Discussion	<p><b>Guideline 2- Consistency within a Reliability Standard</b>                      The requirement has parts that are of equal importance; only one VRF was assigned so there is no conflict.</p>
FERC VRF G3 Discussion	<p><b>Guideline 3- Consistency among Reliability Standards</b>                      This requirement calls for identifying BES Elements for Dynamic Disturbance Recording. The team could not identify other continent-wide reliability standards of the same nature.</p>
FERC VRF G4 Discussion	<p><b>Guideline 4- Consistency with NERC Definitions of VRFs</b>                      Failure to identify BES Elements for Dynamic Disturbance Recording could not directly affect the electrical state or capability of the BES, or the ability to effectively monitor and control the BES. Violation of the requirement will not lead to bulk electric system instability, separation, or cascading failures. The VRF for this requirement is “Lower” which is consistent with NERC guidelines for similar requirements.</p>
FERC VRF G5 Discussion	<p><b>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</b>                      R6 contains only one objective which identifies BES Elements within specified criteria and to review the list every 5 calendar years. Since the requirement has only one objective, only one VRF was assigned.</p>
Proposed Lower VSL	<p>The Responsible Entity accurately identified the Elements for DDR as directed by Requirement R6, Part 6.1 for more than 80% but less than 100% of the required Elements.</p> <p style="text-align: center;">OR</p> <p>The Responsible Entity assessed the Elements for DDR as directed by Requirement R6, Part 6.2 but was late by 30 calendar days or less.</p>
Proposed Moderate VSL	<p>The Responsible Entity accurately identified the Elements for DDR as directed by Requirement R6, Part 6.1 for more than 70% but less than or equal to 80% of the required Elements.</p> <p style="text-align: center;">OR</p> <p>The Responsible Entity assessed the Elements for DDR as directed by Requirement R6, Part 6.2 but was late by greater than 30 calendar days and less than or equal to 60 calendar days.</p>
Proposed High VSL	<p>The Responsible Entity accurately identified the Elements for DDR as directed by Requirement R6, Part 6.1 for more than 60% but less than</p>

VRF and VSL Justifications – PRC-002-2, R6	
	<p>or equal to 70% of the required Elements.</p> <p style="text-align: center;">OR</p> <p>The Responsible Entity assessed the Elements for DDR as directed by Requirement R6, Part 6.2 but was late by greater than 60 calendar days and less than or equal to 90 calendar days.</p>
Proposed Severe VSL	<p>The Responsible Entity accurately identified the Elements for DDR as directed by Requirement R6, Part 6.1 for less than or equal to 60% of the required Elements.</p> <p style="text-align: center;">OR</p> <p>The Responsible Entity assessed the Elements for DDR as directed by Requirement R6, Part 6.2 but was late by greater than 90 calendar days.</p>
<p><b>FERC VSL G1</b></p> <p>Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>PRC-002-2 differs from PRC-002-1 (not enforceable) and PRC-018-1 (enforceable and will be retired upon approval of PRC-002-2) in that PRC-002-2 deals with Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording in order to adequately capture data for events analysis; and not equipment as referenced in the PRC-002-1 and PRC-018-1. Therefore, the VSL’s cannot be compared between PRC-002-2 and PRC-018-1. The VSL’s for this requirement meet or exceed the current level of compliance.</p>
<p><b>FERC VSL G2</b></p> <p>Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous</p>	<p>Guideline 2a:</p> <p>The VSL assignment is for R6 is not binary.</p> <p>Guideline 2b:</p> <p>The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>

VRF and VSL Justifications – PRC-002-2, R6	
Language	
<b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.
<b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	Proposed VSLs are based on a single violation and not a cumulative violation methodology.
<b>FERC VSL G5</b> Requirements where a single lapse in protection can compromise computer network security, i.e., the ‘weakest link’ characteristic, should apply binary VSLs	Non CIP
<b>FERC VSL G6</b> VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	Non CIP

VRF and VSL Justifications – PRC-002-2, R7	
Proposed VRF	Lower
NERC VRF Discussion	R7 is a requirement in a long-term 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 of capability of the BES, or the ability to effectively monitor, control, or restore the BES.
FERC VRF G1 Discussion	<b>Guideline 1- Consistency w/ Blackout Report</b> R7 requires the Responsible Entity to notify the owners to provide Dynamic Disturbance Recordings for Elements selected in R6. This is consistent with FERC guideline G1, Recommendation 12 of the Blackout Report.
FERC VRF G2 Discussion	<b>Guideline 2- Consistency within a Reliability Standard</b> This requirement does not have parts.
FERC VRF G3 Discussion	<b>Guideline 3- Consistency among Reliability Standards</b> This requirement calls for the Responsible Entity to notify the owners of the Elements for Dynamic Disturbance Recording selected in R6. The team could not identify other continent-wide reliability standards of the same nature.
FERC VRF G4 Discussion	<b>Guideline 4- Consistency with NERC Definitions of VRFs</b> Failure to notify the owners of the Elements selected for Dynamic Disturbance Recording in R6 could not directly affect the electrical state or capability of the BES, or the ability to effectively monitor and control the BES. Violation of the requirement will not lead to bulk electric system instability, separation, or cascading failures. The VRF for this requirement is “Lower” which is consistent with NERC guidelines for similar requirements.
FERC VRF G5 Discussion	<b>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</b> R7 contains only one objective which is to notify the owners of BES Elements selected for Dynamic Disturbance Recording selected in R6.
Proposed Lower VSL	The Responsible Entity as directed by Requirement R7 was late in notifying the owners by 10 calendar days or less.
Proposed Moderate VSL	The Responsible Entity as directed by Requirement R7 was late in notifying the owners by greater than 10 calendar days but less than or equal to 20 calendar days.

VRF and VSL Justifications – PRC-002-2, R7	
Proposed High VSL	The Responsible Entity as directed by Requirement R7 was late in notifying the owners by greater than 20 calendar days but less than or equal to 30 calendar days.
Proposed Severe VSL	The Responsible Entity as directed by Requirement R7 was late in notifying one or more owners by greater than 30 calendar days.
<b>FERC VSL G1</b> Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	PRC-002-2 differs from PRC-002-1 (not enforceable) and PRC-018-1 (enforceable and will be retired upon approval of PRC-002-2) in that PRC-002-2 deals with Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording in order to adequately capture data for events analysis; and not equipment as referenced in the PRC-002-1 and PRC-018-1. Therefore, the VSL’s cannot be compared between PRC-002-2 and PRC-018-1. The VSL’s for this requirement meet or exceed the current level of compliance.
<b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties  Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent  Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 2a: The VSL assignment is for R7 is not binary.  Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.
<b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.

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VRF and VSL Justifications – PRC-002-2, R7	
<p><b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	Proposed VSLs are based on a single violation and not a cumulative violation methodology.
<p><b>FERC VSL G5</b> Requirements where a single lapse in protection can compromise computer network security, i.e., the ‘weakest link’ characteristic, should apply binary VSLs</p>	Non CIP
<p><b>FERC VSL G6</b> VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	Non CIP

VRF and VSL Justifications – PRC-002-2, R8	
<b>Proposed VRF</b>	<b>Lower</b>
NERC VRF Discussion	R8 is a requirement in a long-term 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 of capability of the BES, or the ability to

VRF and VSL Justifications – PRC-002-2, R8	
	effectively monitor, control, or restore the BES.
FERC VRF G1 Discussion	<b>Guideline 1- Consistency w/ Blackout Report</b> R8 provides criteria for Dynamic Disturbance Recordings which falls under Recommendation 12 of the Blackout Report and is consistent with FERC guideline G1.
FERC VRF G2 Discussion	<b>Guideline 2- Consistency within a Reliability Standard</b> The requirement has parts that are of equal importance; only one VRF was assigned so there is no conflict.
FERC VRF G3 Discussion	<b>Guideline 3- Consistency among Reliability Standards</b> This requirement establishes criteria for Dynamic Disturbance Recording selected in R6. The team could not identify other continent-wide reliability standards of the same nature.
FERC VRF G4 Discussion	<b>Guideline 4- Consistency with NERC Definitions of VRFs</b> Failure to establish criteria for Dynamic Disturbance Recording could not directly affect the electrical state or capability of the BES, or the ability to effectively monitor and control the BES. Violation of the requirement will not lead to bulk electric system instability, separation, or cascading failures. The VRF for this requirement is “Lower” which is consistent with NERC guidelines for similar requirements.
FERC VRF G5 Discussion	<b>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</b> R contains only one objective which is to establish criteria for Dynamic Disturbance Recording. Since the requirement has only one objective, only one VRF was assigned.
Proposed Lower VSL	The Transmission Owner implemented DDR as directed by Requirement R8, Parts 8.1 and 8.4 that covers more than 75% but less than 100% of the total required electrical quantities for all applicable BES Elements.
Proposed Moderate VSL	The Transmission Owner implemented DDR as directed by Requirement R8, Parts 8.1 through 8.4 for more than 50% but less than or equal to 75% of the total required electrical quantities for all applicable BES Elements.
Proposed High VSL	The Transmission Owner implemented DDR as directed by Requirement R8, Parts 8.1 through 8.4 for more than 0% but less than or equal to 50% of the total required electrical quantities for all



VRF and VSL Justifications – PRC-002-2, R8	
	applicable BES Elements.
Proposed Severe VSL	The Transmission Owner failed to implement DDR as directed by Parts 8.1 through 8.4.
<p><b>FERC VSL G1</b> Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	PRC-002-2 differs from PRC-002-1 (not enforceable) and PRC-018-1 (enforceable and will be retired upon approval of PRC-002-2) in that PRC-002-2 deals with Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording in order to adequately capture data for events analysis; and not equipment as referenced in the PRC-002-1 and PRC-018-1. Therefore, the VSL’s cannot be compared between PRC-002-2 and PRC-018-1. The VSL’s for this requirement meet or exceed the current level of compliance.
<p><b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R8 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p><b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.
<p><b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based</p>	Proposed VSLs are based on a single violation and not a cumulative violation methodology.

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VRF and VSL Justifications – PRC-002-2, R8	
on A Single Violation, Not on A Cumulative Number of Violations	
<b>FERC VSL G5</b> Requirements where a single lapse in protection can compromise computer network security, i.e., the ‘weakest link’ characteristic, should apply binary VSLs	Non CIP
<b>FERC VSL G6</b> VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	Non CIP

VRF and VSL Justifications – PRC-002-2, R9	
Proposed VRF	Lower
NERC VRF Discussion	R9 is a requirement in a long-term 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 of capability of the BES, or the ability to effectively monitor, control, or restore the BES.
FERC VRF G1 Discussion	<b>Guideline 1- Consistency w/ Blackout Report</b> R9 provides criteria for Dynamic Disturbance Recordings which falls under Recommendation 12 of the Blackout Report and is consistent with FERC guideline G1.

VRF and VSL Justifications – PRC-002-2, R9	
FERC VRF G2 Discussion	<p><b>Guideline 2- Consistency within a Reliability Standard</b>                      The requirement has parts that are of equal importance; only one VRF was assigned so there is no conflict.</p>
FERC VRF G3 Discussion	<p><b>Guideline 3- Consistency among Reliability Standards</b>                      This requirement establishes criteria for Dynamic Disturbance Recording selected in R6. The team could not identify other continent-wide reliability standards of the same nature.</p>
FERC VRF G4 Discussion	<p><b>Guideline 4- Consistency with NERC Definitions of VRFs</b>                      Failure to establish criteria for Dynamic Disturbance Recording could not directly affect the electrical state or capability of the BES, or the ability to effectively monitor and control the BES. Violation of the requirement will not lead to bulk electric system instability, separation, or cascading failures. The VRF for this requirement is “Lower” which is consistent with NERC guidelines for similar requirements.</p>
FERC VRF G5 Discussion	<p><b>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</b>                      R9 contains only one objective which is to establish criteria for Dynamic Disturbance Recording. Since the requirement has only one objective, only one VRF was assigned.</p>
Proposed Lower VSL	<p>The Generator Owner implemented DDR as directed by Requirement R9, Parts 9.1 through 9.4 that covers more than 75% but less than 100% of the total required electrical quantities for all applicable BES Elements.</p>
Proposed Moderate VSL	<p>The Generator Owner implemented DDR as directed by Requirement R9, Parts 9.1 through 9.4 for more than 50% but less than or equal to 75% of the total required electrical quantities for all applicable BES Elements.</p>
Proposed High VSL	<p>The Generator Owner implemented DDR as directed by Requirement R9, Parts 9.1 through 9.4 for more than 0% but less than or equal to 50% of the total required electrical quantities for all applicable BES Elements.</p>
Proposed Severe VSL	<p>The Generator Owner failed to implement DDR as directed by Requirement R9, Parts 9.1 through 9.4.</p>
<b>FERC VSL G1</b>	<p>PRC-002-2 differs from PRC-002-1 (not enforceable) and PRC-018-1</p>

VRF and VSL Justifications – PRC-002-2, R9	
<p>Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>(enforceable and will be retired upon approval of PRC-002-2) in that PRC-002-2 deals with Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording in order to adequately capture data for events analysis; and not equipment as referenced in the PRC-002-1 and PRC-018-1. Therefore, the VSL’s cannot be compared between PRC-002-2 and PRC-018-1. The VSL’s for this requirement meet or exceed the current level of compliance.</p>
<p><b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R9 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p><b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>
<p><b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p><b>FERC VSL G5</b></p>	<p>Non CIP</p>

VRF and VSL Justifications – PRC-002-2, R9	
Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs	
<b>FERC VSL G6</b> VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	Non CIP

VRF and VSL Justifications – PRC-002-2, R10	
Proposed VRF	Lower
NERC VRF Discussion	R10 is a requirement in a long-term 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 of capability of the BES, or the ability to effectively monitor, control, or restore the BES.
FERC VRF G1 Discussion	<b>Guideline 1- Consistency w/ Blackout Report</b> R10 provides criteria for Dynamic Disturbance Recordings which falls under Recommendation 12 of the Blackout Report and is consistent with FERC guideline G1.
FERC VRF G2 Discussion	<b>Guideline 2- Consistency within a Reliability Standard</b> The requirement has parts that are of equal importance; only one VRF was assigned so there is no conflict.
FERC VRF G3 Discussion	<b>Guideline 3- Consistency among Reliability Standards</b>

VRF and VSL Justifications – PRC-002-2, R10	
	This requirement establishes the need for continuous data recording and storage for Dynamic Disturbance Recordings established in R6. The team could not identify other continent-wide reliability standards of the same nature.
FERC VRF G4 Discussion	<b>Guideline 4- Consistency with NERC Definitions of VRFs</b> Failure to establish continuous data recording and storage for Dynamic Disturbance Recordings established in R6 could not directly affect the electrical state or capability of the BES, or the ability to effectively monitor and control the BES. Violation of the requirement will not lead to bulk electric system instability, separation, or cascading failures. The VRF for this requirement is “Lower” which is consistent with NERC guidelines for similar requirements.
FERC VRF G5 Discussion	<b>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</b> R10 contains only one objective to establish continuous data recording and storage for Dynamic Disturbance Recordings established in R6. Since the requirement has only one objective, only one VRF was assigned.
Proposed Lower VSL	The Transmission Owner or Generator Owner implemented continuous or non-continuous DDR, as directed in Requirement R10, for more than 75% but less than 100% of the Elements they own as per Requirement R7.
Proposed Moderate VSL	The Transmission Owner or Generator Owner implemented continuous or non-continuous DDR, as directed in Requirement R10, for more than 50% but less than or equal to 75% of the Elements they own as per Requirement R7.
Proposed High VSL	The Transmission Owner or Generator Owner implemented continuous or non-continuous DDR, as directed in Requirement R10, for more than 0% but less than or equal to 50% of the Elements they own as per Requirement R7.
Proposed Severe VSL	The Transmission Owner or Generator Owner failed to implement continuous or non-continuous DDR, as directed in Requirement R10, for the Elements they own as per Requirement R7.
<b>FERC VSL G1</b>	PRC-002-2 differs from PRC-002-1 (not enforceable) and PRC-018-1 (enforceable and will be retired upon approval of PRC-002-2) in that

VRF and VSL Justifications – PRC-002-2, R10	
<p>Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>PRC-002-2 deals with Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording in order to adequately capture data for events analysis; and not equipment as referenced in the PRC-002-1 and PRC-018-1. Therefore, the VSL’s cannot be compared between PRC-002-2 and PRC-018-1. The VSL’s for this requirement meet or exceed the current level of compliance.</p>
<p><b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R10 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p><b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>
<p><b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p><b>FERC VSL G5</b> Requirements where a single</p>	<p>Non CIP</p>

VRF and VSL Justifications – PRC-002-2, R10	
lapse in protection can compromise computer network security, i.e., the ‘weakest link’ characteristic, should apply binary VSLs	
<b>FERC VSL G6</b> VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	Non CIP

VRF and VSL Justifications – PRC-002-2, R11	
Proposed VRF	Lower
NERC VRF Discussion	R11 is a requirement in a long-term 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 of capability of the BES, or the ability to effectively monitor, control, or restore the BES.
FERC VRF G1 Discussion	<b>Guideline 1- Consistency w/ Blackout Report</b> R11 provides criteria for Dynamic Disturbance Recordings which falls under Recommendation 12 of the Blackout Report and is consistent with FERC guideline G1.
FERC VRF G2 Discussion	<b>Guideline 2- Consistency within a Reliability Standard</b> The requirement has parts that are of equal importance; only one VRF was assigned so there is no conflict.
FERC VRF G3 Discussion	<b>Guideline 3- Consistency among Reliability Standards</b> This requirement established technical specifications for Dynamic



VRF and VSL Justifications – PRC-002-2, R11	
	Disturbance Recording selected in R6. The team could not identify other continent-wide reliability standards of the same nature.
FERC VRF G4 Discussion	<b>Guideline 4- Consistency with NERC Definitions of VRFs</b> Failure to establish technical specifications for Dynamic Disturbance Recording selected in R6 could not directly affect the electrical state or capability of the BES, or the ability to effectively monitor and control the BES. Violation of the requirement will not lead to bulk electric system instability, separation, or cascading failures. The VRF for this requirement is “Lower” which is consistent with NERC guidelines for similar requirements.
FERC VRF G5 Discussion	<b>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</b> R11 contains only one objective which is to establish technical specifications for Dynamic Disturbance Recording selected in R6. Since the requirement has only one objective, only one VRF was assigned.
Proposed Lower VSL	The Transmission Owner or Generator Owner implemented Dynamic Disturbance Recording that meets more than 75% but less than 100% of the total recording properties as specified in Requirement R11.
Proposed Moderate VSL	The Transmission Owner or Generator Owner implemented Dynamic Disturbance Recording that meets more than 50% but less than or equal to 75% of the total recording properties as specified in Requirement R11.
Proposed High VSL	The Transmission Owner or Generator Owner implemented Dynamic Disturbance Recording that meets more than 10% but less than or equal to 50% of the total recording properties as specified in Requirement R11.
Proposed Severe VSL	The Transmission Owner or Generator Owner implemented Dynamic Disturbance Recording that meets more than 1% but less than or equal to 10% of the total recording properties as specified in Requirement R11.
<b>FERC VSL G1</b> Violation Severity Level Assignments Should Not	PRC-002-2 differs from PRC-002-1 (not enforceable) and PRC-018-1 (enforceable and will be retired upon approval of PRC-002-2) in that PRC-002-2 deals with Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording in order to adequately capture

VRF and VSL Justifications – PRC-002-2, R11	
<p>Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>data for events analysis; and not equipment as referenced in the PRC-002-1 and PRC-018-1. Therefore, the VSL’s cannot be compared between PRC-002-2 and PRC-018-1. The VSL’s for this requirement meet or exceed the current level of compliance.</p>
<p><b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R11 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p><b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	
<p><b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p><b>FERC VSL G5</b> Requirements where a single lapse in protection can compromise computer</p>	<p>Non CIP</p>

VRF and VSL Justifications – PRC-002-2, R11	
network security, i.e., the 'weakest link' characteristic, should apply binary VSLs	
<b>FERC VSL G6</b> VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	Non CIP

VRF and VSL Justifications – PRC-002-2, R12	
Proposed VRF	Lower
NERC VRF Discussion	R12 is a requirement in a long-term 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 of capability of the BES, or the ability to effectively monitor, control, or restore the BES.
FERC VRF G1 Discussion	<b>Guideline 1- Consistency w/ Blackout Report</b> R12 requires time synchronization of Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording data which falls under Recommendation 12 of the Blackout Report and is consistent with FERC guideline G1.
FERC VRF G2 Discussion	<b>Guideline 2- Consistency within a Reliability Standard</b> This requirement does not have parts.
FERC VRF G3 Discussion	<b>Guideline 3- Consistency among Reliability Standards</b> This requirement calls for time synchronization for Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording data for locations established in R1 and R6. The team could not identify

VRF and VSL Justifications – PRC-002-2, R12	
	other continent-wide reliability standards of the same nature.
FERC VRF G4 Discussion	<p><b>Guideline 4- Consistency with NERC Definitions of VRFs</b></p> <p>Failures to time synchronize Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording data could not directly affect the electrical state or capability of the BES, or the ability to effectively monitor and control the BES. Violation of the requirement will not lead to bulk electric system instability, separation, or cascading failures. The VRF for this requirement is “Lower” which is consistent with NERC guidelines for similar requirements.</p>
FERC VRF G5 Discussion	<p><b>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</b></p> <p>R12 contains only one objective which is to time synchronize Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording data. Since the requirement has only one objective, only one VRF was assigned.</p>
Proposed Lower VSL	The Transmission Owner or Generator Owner implemented time synchronization for Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording for more than 90% but less than 100% of the bus locations established in Requirements R1 and Elements established in Requirement R6 as directed by Requirement R12.
Proposed Moderate VSL	The Transmission Owner or Generator Owner implemented time synchronization for Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording for more than 80% but less than or equal to 90% of the bus locations established in Requirements R1 and Elements established in Requirement R6 as directed by Requirement R12.
Proposed High VSL	The Transmission Owner or Generator Owner implemented time synchronization for Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording for more than 70% but less than or equal to 80% of the bus locations established in Requirements R1 and Elements established in Requirement R6 as directed by Requirement R12.
Proposed Severe VSL	The Transmission Owner or Generator Owner failed to implement time synchronization for Sequence of Events Recording, Fault

VRF and VSL Justifications – PRC-002-2, R12	
	Recording, and Dynamic Disturbance Recording for less than 70% of the bus locations established in Requirements R1 and Elements established in Requirement R6 as directed by Requirement R12.
<p><b>FERC VSL G1</b> Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	The proposed VSL’s provide a broader compliance range than the associated VSL’s in PRC-018-1. The VSL’s for this requirement meet or exceed the current level of compliance.
<p><b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R12 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p><b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.
<p><b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of</p>	Proposed VSLs are based on a single violation and not a cumulative violation methodology.

VRF and VSL Justifications – PRC-002-2, R12	
Violations	
<p><b>FERC VSL G5</b> Requirements where a single lapse in protection can compromise computer network security, i.e., the ‘weakest link’ characteristic, should apply binary VSLs</p>	Non CIP
<p><b>FERC VSL G6</b> VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	Non CIP

VRF and VSL Justifications – PRC-002-2, R13	
Proposed VRF	Lower
NERC VRF Discussion	R13 is administrative in nature and a requirement in a long-term 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 of capability of the BES, or the ability to effectively monitor, control, or restore the BES.
FERC VRF G1 Discussion	<b>Guideline 1- Consistency w/ Blackout Report</b> R13 provides criteria around timelines for providing the data and the data format. This is consistent with FERC guideline G1.
FERC VRF G2 Discussion	<b>Guideline 2- Consistency within a Reliability Standard</b> The requirement has parts that are of equal importance; only one VRF

VRF and VSL Justifications – PRC-002-2, R13	
	was assigned so there is no conflict.
FERC VRF G3 Discussion	<p><b>Guideline 3- Consistency among Reliability Standards</b>                      This requirement sets the criteria on providing Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording data for locations selected in R1 and Elements established in R6.</p>
FERC VRF G4 Discussion	<p><b>Guideline 4- Consistency with NERC Definitions of VRFs</b>                      Failure to provide Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording data for locations selected in R1 and Elements established in R6 could not directly affect the electrical state or capability of the BES, or the ability to effectively monitor and control the BES. Violation of the requirement will not lead to bulk electric system instability, separation, or cascading failures. The VRF for this requirement is “Lower” which is consistent with NERC guidelines for similar requirements.</p>
FERC VRF G5 Discussion	<p><b>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</b>                      R13 contains only one objective which is to provide Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording data within the specified criteria. Since the requirement has only one objective, only one VRF was assigned.</p>
Proposed Lower VSL	<p>The Transmission Owner or Generator Owner as directed by Requirement R13, Part 13.1 provided the requested data more than 30 calendar days but less than 40 calendar days from the request.</p> <p style="text-align: center;">OR</p> <p>The Transmission Owner or Generator Owner as directed by Requirement R13, Part 13.2 provided more than 90% but less than 100% of the requested data.</p> <p style="text-align: center;">OR</p> <p>The Transmission Owner or Generator Owner as directed by Requirement R13, Parts 13.3 through 13.5 provided more than 90% but less than 100% in the proper data format.</p>
Proposed Moderate VSL	<p>The Transmission Owner or Generator Owner as directed by Requirement R13, Part 13.1 provided the requested data more than 40 calendar days but less than or equal to 50 calendar days from the request.</p>

VRF and VSL Justifications – PRC-002-2, R13	
	<p>OR</p> <p>The Transmission Owner or Generator Owner as directed by Requirement R13, Part 13.2 provided more than 80% but less than or equal to 90% of the requested data.</p> <p>OR</p> <p>The Transmission Owner or Generator Owner as directed by Requirement R13, Parts 13.3 through 13.5 provided more than 80% but less than or equal to 90% in the proper data format.</p>
Proposed High VSL	<p>The Transmission Owner or Generator Owner as directed by Requirement R13, Part 13.1 provided the requested data more than 50 calendar days but less than or equal to 60 calendar days from the request.</p> <p>OR</p> <p>The Transmission Owner or Generator Owner as directed by Requirement R13, Part 13.2 provided more than 70% but less than or equal to 80% of the requested data.</p> <p>OR</p> <p>The Transmission Owner or Generator Owner as directed by Requirement R13, Parts 13.3 through 13.5 provided more than 70% but less than or equal to 80% in the proper data format.</p>
Proposed Severe VSL	<p>The Transmission Owner or Generator Owner as directed by Requirement R13, Part 13.1 failed to provide the requested data more than 60 calendar days from the request.</p> <p>OR</p> <p>The Transmission Owner or Generator Owner as directed by Requirement R13, Part 13.2 failed to provide less than or equal to 70% of the requested data.</p> <p>OR</p> <p>The Transmission Owner or Generator Owner as directed by Requirement R13, Parts 13.3 through 13.5 provided less than or equal to 70% in the proper data format.</p>



VRF and VSL Justifications – PRC-002-2, R13	
<p><b>FERC VSL G1</b> Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The proposed VSL’s provide a broader compliance range than the associated VSL’s in PRC-018-1. The VSL’s for this requirement meet or exceed the current level of compliance.</p>
<p><b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R13 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p><b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>
<p><b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p><b>FERC VSL G5</b> Requirements where a single</p>	<p>Non CIP</p>

VRF and VSL Justifications – PRC-002-2, R13	
lapse in protection can compromise computer network security, i.e., the ‘weakest link’ characteristic, should apply binary VSLs	
<b>FERC VSL G6</b> VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	Non CIP

VRF and VSL Justifications – PRC-002-2, R14	
Proposed VRF	Lower
NERC VRF Discussion	R14 is a requirement in a long-term 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 of capability of the BES, or the ability to effectively monitor, control, or restore the BES.
FERC VRF G1 Discussion	<b>Guideline 1- Consistency w/ Blackout Report</b> R14 provides criteria around the availability of Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording data.
FERC VRF G2 Discussion	<b>Guideline 2- Consistency within a Reliability Standard</b> This requirement does not have parts.
FERC VRF G3 Discussion	<b>Guideline 3- Consistency among Reliability Standards</b> This requirement sets the criteria around the availability of Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording data.

VRF and VSL Justifications – PRC-002-2, R14	
FERC VRF G4 Discussion	<p><b>Guideline 4- Consistency with NERC Definitions of VRFs</b></p> <p>Failure to follow the criteria around the availability of Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording data could not directly affect the electrical state or capability of the BES, or the ability to effectively monitor and control the BES. Violation of the requirement will not lead to bulk electric system instability, separation, or cascading failures. The VRF for this requirement is “Lower” which is consistent with NERC guidelines for similar requirements.</p>
FERC VRF G5 Discussion	<p><b>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</b></p> <p>R14 contains only one objective which is to establish criteria around the availability of Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording data. Since the requirement has only one objective, only one VRF was assigned.</p>
Proposed Lower VSL	The Transmission Owner or Generator Owner as directed by Requirement R14 reported a failure and provided a Corrective Action Plan to the Regional Entity more than 90 calendar days but less than 100 calendar days after discovery of the failure.
Proposed Moderate VSL	The Transmission Owner or Generator Owner as directed by Requirement R14 reported a failure and provided a Corrective Action Plan to the Regional Entity more than 100 calendar days but less than or equal to 110 calendar days after discovery of the failure.
Proposed High VSL	The Transmission Owner or Generator Owner as directed by Requirement R14 reported a failure and provided a Corrective Action Plan to the Regional Entity more than 110 calendar days but less than or equal to 120 calendar days after discovery of the failure.
Proposed Severe VSL	The Transmission Owner or Generator Owner as directed by Requirement R14 failed to report a failure and provide a Corrective Action Plan to the Regional Entity more than 120 calendar days after discovery of the failure.
<p><b>FERC VSL G1</b></p> <p>Violation Severity Level Assignments Should Not</p>	<p>PRC-002-2 differs from PRC-002-1 (not enforceable) and PRC-018-1 (enforceable and will be retired upon approval of PRC-002-2) in that PRC-002-2 deals with Sequence of Events Recording, Fault Recording, and Dynamic Disturbance Recording in order to adequately capture</p>

VRF and VSL Justifications – PRC-002-2, R14	
Have the Unintended Consequence of Lowering the Current Level of Compliance	data for events analysis; and not equipment as referenced in the PRC-002-1 and PRC-018-1. Therefore, the VSL’s cannot be compared between PRC-002-2 and PRC-018-1. The VSL’s for this requirement meet or exceed the current level of compliance.
<p><b>FERC VSL G2</b> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R14 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p><b>FERC VSL G3</b> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.
<p><b>FERC VSL G4</b> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	Proposed VSLs are based on a single violation and not a cumulative violation methodology.
<p><b>FERC VSL G5</b> Requirements where a single lapse in protection can compromise computer</p>	Non CIP

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VRF and VSL Justifications – PRC-002-2, R14	
network security, i.e., the 'weakest link' characteristic, should apply binary VSLs	
<b>FERC VSL G6</b> VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	Non CIP