

Project 2010-03 - Modeling Data

VRF and VSL Justifications

The following table provides analysis and justification for each VRF and VSL assigned in MOD-032-1 and MOD-033-1.

VRF and VSL Justifications – MOD-032-1, Requirement R1	
Proposed VRF	LOWER
NERC VRF Discussion	The purpose of this requirement is to ensure that the data requirements and reporting procedures established by planning coordinators meet minimum criteria. It is a requirement in a planning time frame that, if violated, would not, under emergency, abnormal, or restorative conditions, be expected to adversely affect the electrical state or capability of the bulk electric system.
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report: Requirement supports recommendation 14: Improve system modeling data and data exchange practices.
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard: The requirement calls for creation of data requirements and reporting procedures to support data used in Interconnection-wide power flow and dynamics cases. The VRF is only applied at the requirement level and the Requirement Parts are treated equally. A Lower VRF is consistent with the risk impact of a violation.
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards: This requirement maps from MOD-011-0 and MOD-013-0, which were not approved by FERC, which has a VRF of High for the main requirement and Medium for the requirement parts. Requirement R1 acts in concert with its corollary requirement, Requirement R2, which requires data owners to submit the required data, which has a VRF of Medium, and together the VRFs are consistent with previous versions.
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs: Violation of this requirement itself is unlikely to adversely affect the bulk power system.

Project YYYY-##.# - Name of Project

FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation: The proposed requirement does not co-mingle more than one obligation and therefore has a single VRF.		
Proposed VSL			
Lower	Moderate	High	Severe
The Planning Coordinator and Transmission Planner(s) developed steady-state, dynamics, and short circuit modeling data requirements and reporting procedures, but failed to include less than or equal to 25% of the required components specified in Requirement R1.	The Planning Coordinator and Transmission Planner(s) developed steady-state, dynamics, and short circuit modeling data requirements and reporting procedures, but failed to include greater than 25% but less than or equal to 50% of the required components specified in Requirement R1.	The Planning Coordinator and Transmission Planner(s) developed steady-state, dynamics, and short circuit modeling data requirements and reporting procedures, but failed to include greater than 50% but less than or equal to 75% of the required components specified in Requirement R1.	The Planning and Transmission Planner(s) Coordinator did not develop any steady-state, dynamics, and short circuit modeling data requirements and reporting procedures required by Requirement R1; OR The Planning Coordinator and Transmission Planner(s) developed steady-state, dynamics, and short circuit modeling data requirements and reporting procedures, but failed to include greater than 75% of the required components specified in Requirement R1.

Project YYYY-##.# - Name of Project

<p>NERC VSL Guidelines</p>	<p>Meets NERC’s VSL Guidelines—There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.</p>
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The VSLs provide reasonable gradations of severity, and they do not lower current levels of compliance.</p>
<p>FERC VSL G2 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: N/A Guideline 2b: The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be</p>	<p>The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.</p>

Project YYYY-##.# - Name of Project

Consistent with the Corresponding Requirement	
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	The VSL is based on a single violation and not cumulative violations.
FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs	N/A
FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	N/A

VRF and VSL Justifications – MOD-032-1, Requirement R2	
Proposed VRF	MEDIUM
NERC VRF Discussion	The purpose of this requirement is to ensure that data owners subject to the standard submit data according to the data requirements and reporting procedures established by Planning Coordinators under Requirement R1. Not providing the data could 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 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.
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report: Requirement supports recommendation 14: Improve system modeling data and data exchange practices.
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard: The requirement calls for submission of data according to data requirements and reporting procedures to support Interconnection-wide power flow and dynamics cases. The VRF is only applied at the requirement level and the Requirement Parts are treated equally. A Medium VRF is consistent with the risk impact of a violation, especially in light of the blackout recommendations.
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards: This requirement maps from MOD-010 and MOD-012, which have VRFs of Medium; therefore, the VRF is consistent with previous versions.
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs: Violation of this requirement may affect the bulk power system, but is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation: The proposed requirement does not co-mingle more than one obligation and therefore has a single VRF.

Project YYYY-##.# - Name of Project

Proposed VSL			
Lower	Moderate	High	Severe
<p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s), but failed to provide less than or equal to 25% of the required data specified in Attachment 1;</p> <p>OR</p> <p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s), but</p>	<p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s), but failed to provide greater than 25% but less than or equal to 50% of the required data specified in Attachment 1;</p> <p>OR</p> <p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and</p>	<p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s), but failed to provide greater than 50% but less than or equal to 75% of the required data specified in Attachment 1;</p> <p>OR</p> <p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s), but greater than 50% but less than or equal to 75% of the required data failed to meet data</p>	<p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider did not provide any steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s);</p> <p>OR</p> <p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s), but failed to provide greater than</p>

Project YYYY-##.# - Name of Project

<p>less than or equal to 25% of the required data failed to meet data format, shareability, level of detail, or case type specifications;</p> <p>OR</p> <p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider failed to provide steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s) within the schedule specified by the data requirements and reporting procedures but did provide the data in less than or equal to 15 calendar days after the specified date.</p>	<p>Planning Coordinator(s), but greater than 25% but less than or equal to 50% of the required data failed to meet data format, shareability, level of detail, or case type specifications;</p> <p>OR</p> <p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider failed to provide steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s) within the schedule specified by the data requirements and reporting procedures but did provide the data in greater than 15 but less than or equal to 30 calendar days after the specified date.</p>	<p>format, shareability, level of detail, or case type specifications;</p> <p>OR</p> <p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider failed to provide steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s) within the schedule specified by the data requirements and reporting procedures but did provide the data in greater than 30 but less than or equal to 45 calendar days after the specified date.</p>	<p>75% of the required data specified in Attachment 1;</p> <p>OR</p> <p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s), but greater than 75% of the required data failed to meet data format, shareability, level of detail, or case type specifications;</p> <p>OR</p> <p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, or Transmission Service Provider failed to provide steady-state, dynamics, and short circuit</p>
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Project YYYY-##.# - Name of Project

			modeling data to its Transmission Planner(s) and Planning Coordinator(s) within the schedule specified by the data requirements and reporting procedures but did provide the data in greater than 45 calendar days after the specified date.
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Project YYYY-##.# - Name of Project

<p>NERC VSL Guidelines</p>	<p>Meets NERC’s VSL Guidelines—There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.</p>
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The VSLs provide reasonable gradations of severity, and they do not lower current levels of compliance.</p>
<p>FERC VSL G2 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: N/A Guideline 2b: The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be</p>	<p>The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.</p>

Project YYYY-##.# - Name of Project

Consistent with the Corresponding Requirement	
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	The VSL is based on a single violation and not cumulative violations.
FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs	N/A
FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	N/A

VRF and VSL Justifications – MOD-032-1, Requirement R3	
Proposed VRF	LOWER
NERC VRF Discussion	This requirement provides a mechanism for the Planning Coordinator and Transmission Planner (that does not exist in the current standards) to collect corrected data from the entities that have the data. As a feedback loop for increasing accuracy of data, violation of this requirement would not 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, and a Lower VRF is appropriate.
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report: Requirement supports recommendation 14: Improve system modeling data and data exchange practices.
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard: This requirement provides a feedback loop for certain circumstances, and the VRF is only applied at the requirement level and the Requirement Parts are treated equally. The assigned VRF is consistent with the risk impact of a violation across the standard.
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards: This is a new requirement and is commensurate in risk with Requirement R1. Both requirements have the same VRF.
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs: Violation of this requirement itself is unlikely to adversely affect the bulk power system.
FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation: The proposed requirement does not co-mingle more than one obligation and therefore has a single VRF.

Project YYYY-##.# - Name of Project

Proposed VSL			
Lower	Moderate	High	Severe
<p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider failed to provide a written response to its Transmission Planner(s) or Planning Coordinator(s) according to the specifications of Requirement R4 within 90 calendar days (or within a longer period agreed upon by the notifying Planning Coordinator or Transmission Planner), but did provide the response within 105 calendar days (or within 15 calendar days after the longer period agreed upon by the notifying Planning Coordinator or Transmission Planner).</p>	<p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider failed to provide a written response to its Transmission Planner(s) or Planning Coordinator(s) according to the specifications of Requirement R4 within 90 calendar days (or within a longer period agreed upon by the notifying Planning Coordinator or Transmission Planner), but did provide the response within greater than 105 calendar days but less than or equal to 120 calendar days (or within greater than 15 calendar days but less than or equal to 30 calendar days after the longer period agreed upon by the notifying Planning</p>	<p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider failed to provide a written response to its Transmission Planner(s) or Planning Coordinator(s) according to the specifications of Requirement R4 within 90 calendar days (or within a longer period agreed upon by the notifying Planning Coordinator or Transmission Planner), but did provide the response within greater than 120 calendar days but less than or equal to 135 calendar days (or within greater than 30 calendar days but less than or equal to 45 calendar days after the longer period agreed upon by the notifying Planning Coordinator or Transmission Planner).</p>	<p>The Balancing Authority, Generator Owner, Load Serving Entity, Resource Planner, Transmission Owner, or Transmission Service Provider failed to provide a written response to its Transmission Planner(s) or Planning Coordinator(s) according to the specifications of Requirement R4 within 135 calendar days (or within a longer period agreed upon by the notifying Planning Coordinator or Transmission Planner).</p>

Project YYYY-##.# - Name of Project

	Coordinator or Transmission Planner).		
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Project YYYY-##.# - Name of Project

<p>NERC VSL Guidelines</p>	<p>Meets NERC’s VSL Guidelines—There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.</p>
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The VSLs provide reasonable gradations of severity, and they do not lower current levels of compliance.</p>
<p>FERC VSL G2 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: N/A</p> <p>Guideline 2b: The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be</p>	<p>The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.</p>

Project YYYY-##.# - Name of Project

Consistent with the Corresponding Requirement	
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	The VSL is based on a single violation and not cumulative violations.
FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs	N/A
FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	N/A

VRF and VSL Justifications – MOD-032-1, Requirement R4	
Proposed VRF	MEDIUM
NERC VRF Discussion	The requirement creates a clear expectation that Planning Coordinators will make available data that they collect under Requirement R2 in support of their respective Interconnection-wide case(s). While different entities in each Interconnection create the Interconnection-wide case(s), the requirement to submit the data to the “ERO or its designee” supports a framework whereby NERC, in collaboration and agreement with those other organizations, can designate the appropriate organizations in each Interconnection to build the specific Interconnection-wide case(s). Information for use in the planning models is important, and a violation of this requirement could affect reliability, but a violation would not likely lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report: Requirement supports recommendation 14: Improve system modeling data and data exchange practices.
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard: Requirement R4 specifies actions to ensure that data provided under the standard is available for use in the Interconnection-wide case(s), and, much like the importance of entities providing the data under Requirement R2, a VRF of Medium is appropriate.
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards: This requirement replaces MOD-014 and MOD-015, and a Medium VRF is consistent with those standards.
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs: Violation of this requirement may affect the bulk power system, but is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation: The proposed requirement does not co-mingle more than one obligation and therefore has a single VRF.

Project YYYY-##.# - Name of Project

Proposed VSL			
Lower	Moderate	High	Severe
The Planning Coordinator made available the required data to the ERO or its designee but failed to provide less than or equal to 25% of the required data in the format specified by the ERO or its designee.	The Planning Coordinator made available the required data to the ERO or its designee but failed to provide greater than 25% but less than or equal to 50% of the required data in the format specified by the ERO or its designee.	The Planning Coordinator made available the required data to the ERO or its designee but failed to provide greater than 50% but less than or equal to 75% of the required data in the format specified by the ERO or its designee.	The Planning Coordinator made available the required data to the ERO or its designee but failed to provide greater than 75% of the required data in the format specified by the ERO or its designee.

Project YYYY-##.# - Name of Project

<p>NERC VSL Guidelines</p>	<p>Meets NERC’s VSL Guidelines—There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.</p>
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The VSLs provide reasonable gradations of severity, and they do not lower current levels of compliance.</p>
<p>FERC VSL G2 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: N/A Guideline 2b: The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be</p>	<p>The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.</p>

Project YYYY-##.# - Name of Project

Consistent with the Corresponding Requirement	
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	The VSL is based on a single violation and not cumulative violations.
FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs	N/A
FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	N/A

VRF and VSL Justifications – MOD-033-1, Requirement R1	
Proposed VRF	MEDIUM
NERC VRF Discussion	This requirement requires the Planning Coordinator to implement a documented data validation process to validate data in the Planning Coordinator’s portion of the existing system in the steady-state and dynamic models to compare performance against expected behavior or response. Accuracy of data used in the planning models may be affected. A violation of this requirement could affect reliability, but a violation would not likely lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report: Requirement supports recommendation 14: Improve system modeling data and data exchange practices.
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard: The requirement specifies that Planning Coordinators must implement a data validation process. The VRF is only applied at the requirement level and the Requirement Parts are treated equally. A Medium VRF is consistent with the risk impact of a violation.
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards: N/A. There are no other NERC Reliability Standards that address similar reliability goals
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs: Violation of this requirement may affect the bulk power system, but is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation: The proposed requirement does not co-mingle more than one obligation and therefore has a single VRF.

Project YYYY-##.# - Name of Project

Proposed VSL			
Lower	Moderate	High	Severe
<p>The Planning Coordinator documented and implemented a process to validate data but did not address one of the four required topics under Requirement R1;</p> <p>OR</p> <p>The Planning Coordinator did not perform simulation as required by part 1.1 within 24 calendar months but did perform the simulation within 28 calendar months;</p> <p>OR</p> <p>The Planning Coordinator did not perform simulation as required by part 1.2 within 24 calendar months (or the next dynamic local event in cases where there is more than 24 months between events) but</p>	<p>The Planning Coordinator documented and implemented a process to validate data but did not address two of the four required topics under Requirement R1;</p> <p>OR</p> <p>The Planning Coordinator did not perform simulation as required by part 1.1 within 24 calendar months but did perform the simulation in greater than 28 calendar months but less than or equal to 32 calendar months;</p> <p>OR</p> <p>The Planning Coordinator did not perform simulation as required by part 1.2 within 24 calendar months (or the next dynamic local event in cases where there is more than 24 months between events) but</p>	<p>The Planning Coordinator documented and implemented a process to validate data but did not address three of the four required topics under Requirement R1;</p> <p>OR</p> <p>The Planning Coordinator did not perform simulation as required by part 1.1 within 24 calendar months but did perform the simulation in greater than 32 calendar months but less than or equal to 36 calendar months;</p> <p>OR</p> <p>The Planning Coordinator did not perform simulation as required by part 1.2 within 24 calendar months (or the next dynamic local event in cases where there is more than 24 months between events) but did perform the simulation in greater than 32 calendar months but less</p>	<p>The Planning Coordinator did not have a validation process at all or did not document or implement any of the four required topics under Requirement R1;</p> <p>OR</p> <p>The Planning Coordinator did not validate its portion of the system in the power flow model as required by part 1.1 within 36 calendar months;</p> <p>OR</p> <p>The Planning Coordinator did not perform simulation as required by part 1.2 within 36 calendar months (or the next dynamic local event in cases where there is more than 24 months between events).</p>

Project YYYY-##.# - Name of Project

did perform the simulation within 28 calendar months.	did perform the simulation in greater than 28 calendar months but less than or equal to 32 calendar months.	than or equal to 36 calendar months.	
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Project YYYY-##.# - Name of Project

<p>NERC VSL Guidelines</p>	<p>Meets NERC’s VSL Guidelines—There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.</p>
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The VSLs provide reasonable gradations of severity, and they do not lower current levels of compliance.</p>
<p>FERC VSL G2 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: N/A Guideline 2b: The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be</p>	<p>The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.</p>

Project YYYY-##.# - Name of Project

Consistent with the Corresponding Requirement	
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	The VSL is based on a single violation and not cumulative violations.
FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs	N/A
FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	N/A

VRF and VSL Justifications – MOD-033-1, Requirement R2			
Proposed VRF	LOWER		
NERC VRF Discussion	The purpose of this requirement is to ensure that actual system behavior data is available for Planning Coordinators for use in validation under Requirement R1. The information is in a planning time frame that, if violated, would not, under emergency, abnormal, or restorative conditions, be expected to adversely affect the electrical state or capability of the bulk electric system.		
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report: Requirement supports recommendation 14: Improve system modeling data and data exchange practices.		
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard: The requirement calls for certain entities to provide certain data to Planning Coordinators in support of the validations required of the Planning Coordinators under Requirement R1. The VRF is only applied at the requirement level and the Requirement Parts are treated equally. A Lower VRF is consistent with the risk impact of a violation.		
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards: N/A. There are no other NERC Reliability Standards that address similar reliability goals		
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs: Violation of this requirement itself is unlikely to adversely affect the bulk power system.		
FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation: The proposed requirement does not co-mingle more than one obligation and therefore has a single VRF.		
Proposed VSL			
Lower	Moderate	High	Severe
The Reliability Coordinator or Transmission Operator did not	The Reliability Coordinator or Transmission Operator did not	The Reliability Coordinator or Transmission Operator did not	The Reliability Coordinator or Transmission Operator did not

Project YYYY-##.# - Name of Project

<p>provide requested actual system behavior data (or a written response that it does not have the requested data) to a requesting Planning Coordinator within 30 calendar days of the written request, but did provide the data (or written response that it does not have the requested data) in less than or equal to 45 calendar days.</p>	<p>provide requested actual system behavior data (or a written response that it does not have the requested data) to a requesting Planning Coordinator within 30 calendar days of the written request, but did provide the data (or written response that it does not have the requested data) in greater than 45 calendar days but less than or equal to 60 calendar days.</p>	<p>provide requested actual system behavior data (or a written response that it does not have the requested data) to a requesting Planning Coordinator within 30 calendar days of the written request, but did provide the data (or written response that it does not have the requested data) in greater than 60 calendar days but less than or equal to 75 calendar days.</p>	<p>provide requested actual system behavior data (or a written response that it does not have the requested data) to a requesting Planning Coordinator within 75 calendar days; OR The Reliability Coordinator or Transmission Operator provided a written response that it does not have the requested data, but actually had the data.</p>
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Project YYYY-##.# - Name of Project

<p>NERC VSL Guidelines</p>	<p>Meets NERC’s VSL Guidelines—There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.</p>
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The VSLs provide reasonable gradations of severity, and they do not lower current levels of compliance.</p>
<p>FERC VSL G2 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: N/A Guideline 2b: The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be</p>	<p>The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.</p>

Project YYYY-##.# - Name of Project

Consistent with the Corresponding Requirement	
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	The VSL is based on a single violation and not cumulative violations.
FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs	N/A
FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence	N/A