

October 10, 2007

TO: REGISTERED BALLOT BODY

Ladies and Gentlemen:

**Announcement: Comment Period Opens**

**The Standards Committee (SC) announces the following standards action:**

**Violation Severity Levels (Project 2007-23) Posted for 45-day Comment Period October 10 through November 27, 2007**

[Project 2007-23 — Violation Severity Levels](#) proposes defining a set of criteria for assigning Violation Severity Levels or VSLs, and replacing the existing “Levels of Non-compliance” (in the 83 standards approved by FERC) with “VSLs.” FERC directed NERC to replace “Levels of Non-compliance” with “Violation Severity Levels” by March 1, 2008.

Levels of non-compliance assess the reliability-related risk of violating a requirement, and are not used in the ERO’s Sanctions Guidelines. The Sanctions Guidelines use “Violation Risk Factors” to assess the reliability-related risk of violating a requirement and use “Violation Severity Levels” to identify how badly a requirement was violated — VSLs do not assess “importance” or “reliability-related risk” of violating a requirement.

The VSL drafting team received stakeholder comments indicating that there is a need for a set of guidelines for use in developing VSLs. In response to stakeholder comments, the VSL drafting team produced a set of [Violation Severity Level Development Guidelines](#) and worked with several other standard drafting teams to develop a set of proposed VSLs for the 83 FERC-approved standards, using those draft guidelines. The VSL drafting team is seeking comments on the *Violation Severity Level Development Guidelines* and on the proposed VSLs. Please use this [comment form](#) to submit comments to the VSL drafting team.

**Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate. If you have any questions, please contact me at 813-468-5998 or [maureen.long@nerc.net](mailto:maureen.long@nerc.net).

Sincerely,

*Maureen E. Long*

cc: Registered Ballot Body Registered Users  
Standards Mailing List  
NERC Roster