

Nine Recirculation Ballot Windows for Project 2007-23 — Violation Severity Levels Open
[Project 2007-23 — Violation Severity Levels](#) proposes replacing the existing “Levels of Non-compliance” in the 83 standards approved by FERC with Violation Severity Levels (VSLs) by March 1, 2008 to comply with FERC’s June 7, 2007 [Order on Compliance Filing](#). (The NUC-001-1 standard was added to this project.)

The initial ballot for VSLs was conducted from January 21–28, 2008. Balloters submitted many comments with specific suggestions for improvements to many of the VSLs. In the interest of developing the best set of VSLs practical (given the March 1, 2008 deadline), the Standards Committee authorized the VSL DT to consider stakeholder comments from the initial VSL ballots and make improvements to the proposed VSLs before proceeding with the recirculation ballot, and the VSL DT has done that.

Each of the nine sets of VSLs includes several revisions made following the initial ballot, based on stakeholder comment. The VSL DT posted its consideration of all comments submitted and posted revised VSLs, with changes to VSLs highlighted in red. The Standards Committee encourages all members of the Ballot Pool to review the consideration of initial ballot comments and the revised VSLs before determining how to vote in the recirculation ballot.

[Balancing](#) (BAL)

[Critical Infrastructure, Communications, Voltage and Reactive](#) (CIP, COM, VAR)

[Emergency Operations](#) (EOP)

[Facilities and Modeling](#) (FAC, MOD)

[Interchange, Personnel and Nuclear](#) (INT, PER, NUC)

[Interconnected Reliability Operations](#) (IRO)

[Protection and Control](#) (PRC)

[Transmission Operations](#) (TOP)

[Transmission Planning](#) (TPL)

The recirculation [ballot](#) for each of the nine sets of VSLs is open and will remain open until 8 p.m. (EDT) on Tuesday, February 19, 2008.

Members of each ballot pool may:

- Reconsider and change the vote cast in the initial ballot.
- Vote in the recirculation ballot even if no vote was cast during the initial ballot.
- Take no action if there is no change to the vote cast in the initial ballot.

In the recirculation ballot, votes are counted by exception only — if a Ballot Pool member does not submit a revision to that member’s original vote, the vote remains the same as in the initial ballot.

When voting on each set of revised VSLs please take the following into consideration:

- The VSL DT cannot change the language of requirements — the scope of work assigned to the VSL DT is solely to develop VSLs.
- VSLs are used to categorize the degree to which an entity is non-compliant with a particular requirement. VSLs do not consider “risk” or “importance.” Violation Risk Factors (VRFs) identify the reliability-related risk of violating a requirement.
- The issue of double jeopardy (where there is a VSL assigned to a requirement and also to its subrequirements) is a compliance issue and cannot be resolved by the VSL DT. The FERC Order directed that NERC assign a VSL to each requirement and subrequirement that has an associated VRF. (Existing and future drafting teams are only assigning a VRF and a set of VSLs to the main requirement — they are not assigning VRFs or VSLs to subrequirements.)
- The VSL tried to remove as much generic language from the VSLs as practical; however, in some instances the existing requirements do not lend themselves to more specific language.
- Some requirements seem to be very “black and white” and developing multiple levels of VSLs is not practical. Determining the best VSL for these “binary” type requirements is an ongoing struggle.
- Some balloters wanted to subdivide the VSLs into 84 separate ballots. The VSL DT adopted the approach used to ballot the VRFs of grouping the VSLs so that there are several ballots, but not so many ballots that the effort to participate in the ballot would be overwhelming to the point where we may not achieve a quorum.

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.