

Consideration of Comments on Violation Severity Levels — Project 2007-23

http://www.nerc.com/filez/standards/VSLs_Project_2007-23.html

The Violation Severity Levels Drafting Team thanks all commenters who submitted comments on the proposed revisions to 14 sets of VSLs. These standards were posted for a public comment period from January 20, 2011 through February 22, 2011. (The original 30-day comment period was extended to ensure quorum.) The stakeholders were asked to provide feedback on the standards through a special Electronic Comment Form. There were 14 sets of comments, including comments from more than 68 different people from approximately 48 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

The Project 2007-23 team reviewed and responded to all comments. Based on stakeholder comments, the team ultimately made changes to the VSLs for five of the 14 requirements, all to improve clarity, better reflect the language in the requirement, or more fully abide by the Commission's VSL Guidelines:

- **COM-001-1.1 R2:** Several commenters found the VSLs confusing with respect to the distinction between vital telecommunication facilities and emergency telecommunication facilities and equipment not used for routine communications, and the distinctions among managing, alarming, testing and/or actively monitoring. The DT elected to modify the VSLs so that there is a Moderate and a Severe assignment, and "emergency telecommunications facilities and equipment not used for routine communications" are treated separately from "vital telecommunication facilities" in the VSLs, though emergency telecommunications facilities and equipment not used for routine communications are in fact a subset of vital communication facilities. The modified VSLs are clearer and better reflect the language in the requirement, as mandated by FERC Guideline 3.
- **IRO-004-1 R1:** To better reflect the requirement language and conform with FERC's desire for gradated VSLs wherever possible, the DT elected to grade the VSL assignments so that there is a High VSL and a Severe VSL. The High VSL applies when one part of the requirement is not completed (failure to conduct next-day reliability analyses OR failure to conduct Contingency analysis studies), and the Severe VSL applies when both parts of the requirement are not completed.
- **IRO-004-1 R4:** Several commenters pointed out that the VSLs as written left timing gaps, and the VSL language was modified as suggested.
- **IRO-004-1 R5:** Several commenters noted that the use of the term "information" in the Moderate, High, and Severe VSLs was inconsistent with the requirement language. "Information" was changed to "results." Some commenters also suggested clarifying the timing portion of the VSLs and avoiding gaps by using the same language as in IRO-004-1, R4. The DT agreed and made this change.
- **PRC-005-1 R1:** Commenters caught a typo in the High VSL, and the DT made the suggested correction.

There were a few other themes throughout the comments that the DT did not use in its modifications:

- In some cases, commenters suggested language changes that would have been a deviation from requirement language, so the DT could not make the suggested change (per FERC Guideline 3).
- For the VSLs written for sub-requirements, many commenters wondered why the sub-requirement VSLs had not been rolled up into the VSL of the main requirement. The DT pointed out that in the case of some older standards, in which the sub-

requirements are written as though they are actual requirements, it has been deemed appropriate to write VSLs for the sub-requirement. No changes were made in these cases.

- For the IRO VSLs, several commenters preferred the previous VSLs, but the DT disagreed with their recommendations to return to the previous version. The previous VSLs cited number of days missed, which violated FERC Guideline 4 because the penalty would have to be based on cumulative violations, rather than a single violation. The DT did not make the suggested change.
- For PRC-001-1 R1, many commenters expressed concern that the requirement (and thus the VSLs) was too vague. These commenters were reminded that changes to the requirement are not within the scope of the VSL DT. To change the VSL but not the requirement would represent a violation of FERC Guideline 3.

Other less-frequent comments are addressed below in the detailed comment responses.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herb Schrayshuen, at 609-452-8060 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Development Procedures: <http://www.nerc.com/standards/newstandardsprocess.html>.

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Guy Zito	Northeast Power Coordinating Council										X
Additional Member		Additional Organization	Region	Segment Selection									
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10									
2.	Greg Campoli	New York Independent System Operator	NPCC	2									
3.	Kurtis Chong	Independent Electricity System Operator	NPCC	2									
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1									
5.	Bohdan Dackow	US Power Generating Company (USPG)	NPCC	NA									
6.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1									
7.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10									
8.	Brian Evans-Mongeon	Utility Services	NPCC	8									
9.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5									
10.	Brian L. Gooder	Ontario Power Generation Incorporated	NPCC	5									
11.	Kathleen Goodman	ISO - New England	NPCC	2									
12.	David Kiguel	Hydro One Networks Inc.	NPCC	1									
13.	Michael R. Lombardi	Northeast Utilities	NPCC	1									
14.	Randy MacDonald	New Brunswick Power Transmission	NPCC	1									
15.	Bruce Metruck	New York Power Authority	NPCC	6									

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Group/Individual	Commenter	Organization	Registered Ballot Body Segment											
			1	2	3	4	5	6	7	8	9	10		
16. Chantel Haswell	FPL Group, Inc.	NPCC 5												
17. Lee Pedowicz	Northeast Power Coordinating Council	NPCC 10												
18. Robert Pellegrini	The United Illuminating Company	NPCC 1												
19. Saurabh Saksena	National Grid	NPCC 1												
20. Michael Schiavone	National Grid	NPCC 1												
21. Wayne Sipperly	New York Power Authority	NPCC 5												
22. Donald Weaver	New Brunswick System Operator	NPCC 2												
23. Ben Wu	Orange and Rockland Utilities	NPCC NA												
24. Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC 3												
2. Group	Denise Koehn	Bonneville Power Administration	X		X		X	X						
Additional Member Additional Organization Region Segment Selection														
1. Jamie Murphy	BPA, Transmission Technial Operations	WECC 1												
2. Dean Bender	BPA, Transmission Field Services	WECC 1												
3. Tedd Snodgrass	BPA, Transmission Dispatch	WECC 1												
4. Charles Sheppard	BPA, Transmission Field Services	WECC 1												
5. Tim Loepker	BPA, Transmission Field Services	WECC 1												
6. Berhanu Tesema	BPA, Transmission Planning	WECC 1												
7. Carol Larvick	BPA, Transmission Communications & Grid Mode	WECC 1												
3. Group	Jason Marshall	Midwest ISO Standards Collaborators		X										
Additional Member Additional Organization Region Segment Selection														
1.	Terry Harbour	MidAmerican Energy MRO												1
4. Group	Al DiCaprio	IRC Standards Review Committee		X										
Additional Member Additional Organization Region Segment Selection														
1. Patrick Brown	PJM	RFC 2												
2. Jim Castle	NYISO	NPCC 2												
3. Matt Goldberg	ISO-NE	NPCC 2												
4. Dan Rochester	IESO	NPCC 2												

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
5.	Steve Myers	ERCOT	ERCOT 2										
6.	Bill Phillips	Midwest ISO	MRO 2										
7.	Mark Thompson	AESO	WECC 2										
8.	Greg Van Pelt	CAISO	WECC 2										
9.	Charles Yeung	SPP	SPP 2										
5.	Group	Carol Gerou	MRO's NERC Standards Review Subcommittee										X
	Additional Member	Additional Organization	Region	Segment Selection									
1.	Mahmood Safi	Omaha Public Utility District	MRO	1, 3, 5, 6									
2.	Chuck Lawrence	American Transmission Company	MRO	1									
3.	Tom Webb	Wisconsin Public Service Corporation	MRO	3, 4, 5, 6									
4.	Jason Marshall	Midwest ISO Inc.	MRO	2									
5.	Jodi Jenson	Western Area Power Administration	MRO	1, 6									
6.	Ken Goldsmith	Alliant Energy	MRO	4									
7.	Alice Ireland	Xcel Energy	MRO	1, 3, 5, 6									
8.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6									
9.	Eric Ruskamp	Lincoln Electric System	MRO	1, 3, 5, 6									
10.	Joseph Knight	Great River Energy	MRO	1, 3, 5, 6									
11.	Joe DePoorter	Madison Gas & Electric	MRO	3, 4, 5, 6									
12.	Scott Nickels	Rochester Public Utilities	MRO	4									
13.	Terry Harbour	MidAmerican Energy Company	MRO	1, 3, 5, 6									
14.	Richard Burt	Minnkota Power Cooperative, Inc.	MRO	1, 3, 5, 6									
6.	Individual	Joe Petaski	Manitoba Hydro			X		X	X				
7.	Individual	Scott Barfield-McGinnis	Georgia System Operations Corporation			X	X						
8.	Individual	John W Miller	Georgia Transmission Corporation	X									
9.	Individual	Thad Ness	American Electric Power	X		X		X	X				

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment										
				1	2	3	4	5	6	7	8	9	10	
10.	Individual	Si Truc PHAN	Hydro-Quebec TransEnergie (NCR07112)	X										
11.	Individual	JC Culberson	ERCOT		X									
12.	Individual	Dan Rochester	Independent Electricity System Operator		X									
13.	Individual	Michael Gammon	Kansas City Power & Light	X		X		X	X					
14.	Individual	Claudiu Cadar	GDS Associates, Inc	X										

1. Do you agree with the proposed VSL(s) modifications for BAL-003-0.1b, R1? If not, please offer your suggested alternative language.

Summary Consideration: Most stakeholders supported the VSLs as written, but one stated that all the assignments should be lowered. The DT disagrees, for it believes the VSLs are appropriately assigned. No changes made.

Organization	Yes or No	Question 1 Comment
Bonneville Power Administration	No	BAL-003-0-.1b - BPA believes that they should all be lower. Because the changes to Bias from year to year are very small, not meeting this requirement has very little to no affect on reliability of an interconnection.
<p>Response: Thank you for your comment. The DT believes the VSLs are appropriately assigned. VSLs define the degree to which compliance with a requirement was not achieved, not the impact that noncompliance would have on the reliability of the BES. It is the Violation Risk Factors that assess the impact on reliability of violating a specific requirement. No change made.</p>		
Northeast Power Coordinating Council	Yes	
Midwest ISO Standards Collaborators	Yes	
IRC Standards Review Committee	Yes	
MRO's NERC Standards Review Subcommittee	Yes	
Manitoba Hydro	Yes	
American Electric Power	Yes	
Hydro-Quebec TransEnergie (NCR07112)	Yes	
ERCOT	Yes	

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Organization	Yes or No	Question 1 Comment
Independent Electricity System Operator	Yes	
Kansas City Power & Light	Yes	
Georgia System Operations Corporation		
Georgia Transmission Corporation		
GDS Associates, Inc		

2. Do you agree with the proposed VSL(s) modifications for COM-001-1.1, R2? If not, please offer your suggested alternative language.

Summary Consideration: Several commenters found the VSLs confusing with respect to the distinction between vital telecommunication facilities and emergency telecommunication facilities and equipment not used for routine communications, and the distinctions among managing, alarming, testing and/or actively monitoring. The DT elected to modify the VSLs so that there is a Moderate and a Severe assignment, and “emergency telecommunications facilities and equipment not used for routine communications” are treated separately from “vital telecommunication facilities” in the VSLs, though emergency telecommunications facilities and equipment not used for routine communications are in fact a subset of vital communication facilities. The modified VSLs are clearer and better reflect the language in the requirement, as mandated by FERC Guideline 3. Several commenters were also concerned about the ambiguity of terms like “vital” and “special attention,” but because those terms are part of the requirement, it is outside the scope of this team to address any modifications to them.

Organization	Yes or No	Question 2 Comment
Northeast Power Coordinating Council	No	In the Severe VSL insert “telecommunication facilities” after “vital” to improve sentence clarity. The High and Severe VSLs need to be clarified. We understand “emergency telecommunications facilities and equipment not used for routine communications” to be a subset of “vital telecommunications facilities”. However as written, the VSLs seem to treat these “emergency telecommunications facilities” as separate from the “vital telecommunications facilities”. If these emergency telecommunications facilities and equipment ARE considered vital, we suggest removing the High VSL, and in the Severe VSL, replacing “and” before “emergency telecommunications facilities” with “including”.
<p>Response: Thank you for your comment. The DT agrees that the VSLs were confusing with respect to the distinction between vital telecommunication facilities and emergency telecommunication facilities and equipment not used for routine communications. The VSLs have been modified so that there is a Moderate and a Severe assignment, and “emergency telecommunications facilities and equipment not used for routine communications” are treated separately from “vital telecommunication facilities” in the VSLs, though emergency telecommunications facilities and equipment not used for routine communications are in fact a subset of vital communication facilities. We believe that the modified VSLs are clearer and better reflect the language in the requirement, as mandated by FERC Guideline 3.</p>		
Independent Electricity System Operator	No	In the Severe VLS insert “telecommunication facilities” after “vital” to improve sentence clarity. The High and Severe VSLs need to be clarified. We understand “emergency telecommunications facilities and equipment not used for routine communications” to be a subset of “vital telecommunications facilities”. However as written, the VSLs seem to treat these “emergency telecommunications facilities” as separate from the “vital telecommunications facilities”. If these emergency telecommunications facilities and equipment ARE considered vital, we suggest removing the High VSL, and in the Severe VSL, replacing “and” before

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Organization	Yes or No	Question 2 Comment
		"emergency telecommunications facilities" with "including".
<p>Response: Thank you for your comment. The DT agrees that the VSLs were confusing with respect to the distinction between vital telecommunication facilities and emergency telecommunication facilities and equipment not used for routine communications. The VSLs have been modified so that there is a Moderate and a Severe assignment, and "emergency telecommunications facilities and equipment not used for routine communications" are treated separately from "vital telecommunication facilities" in the VSLs, though emergency telecommunications facilities and equipment not used for routine communications are in fact a subset of vital communication facilities. We believe that the modified VSLs are clearer and better reflect the language in the requirement, as mandated by FERC Guideline 3.</p>		
Bonneville Power Administration	No	<p>BPA did not raise this concern with the concurrent ballot, but is raising our concern now. BPA does not believe that it is possible to monitor satellite phones, which are a common form of emergency communications. The word "vital" does not appear to be defined anywhere, so it is a little ambiguous, as is the term "special attention". There seems to be too much left to interpretation. This is a dangerous situation when combined with the higher violation severity levels. The language of the standard needs clarification to be auditable and for assessing violations.</p>
<p>Response: Thank you for your comment. It is outside the scope of this team to make any changes to the language of the requirement or define terms in the requirement.</p>		
Georgia System Operations Corporation	No	<p>This requirement has three actions (manage, alarm, test and/or actively monitor) and three potential categories of equipment (vital, emergency facilities, and emergency equipment - not used for routine communications). The VSL places the violation on the equipment categories which may create a situation of non-uniformity between entities (FERC guideline 2). For example, one entity may have "vital" and no facilities or equipment not used for routine communications.</p> <p>**A violation should be the result of failure to "manage, alarm, test and/or actively monitor" by category of equipment. Entities may have single or multiple sets of equipment and facilities. Therefore, the VSL should read: Moderate VSL: "The responsible entity failed ONE of the THREE requirements to "manage, alarm, test and/or actively monitor" a vital telecommunication facility, or emergency telecommunications facility and equipment not used for routine communications. High VSL: "The responsible entity failed TWO of the THREE requirements to "manage, alarm, test and/or actively monitor" a vital telecommunication facility, or emergency telecommunications facility and equipment not used for routine communications. Severe VSL: "The responsible entity failed all THREE requirements to "manage, alarm, test and/or actively monitor" a vital telecommunication facility, or emergency telecommunications facility and equipment not used for routine communications. Grammatical error: The change in the "Server VSL" column has an additional comma added which changes the meaning of the requirement and statement. "The responsible entity failed to manage, alarm, test(.) and/or actively monitor...". The (.) needs to be removed to correct the statement. (FERC</p>

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Organization	Yes or No	Question 2 Comment
		Guideline 3)
<p>Response: Thank you for your comment. The DT agrees that the VSLs needed clarification, but it believes that your proposed changes could lead to additional confusion.</p> <p>The VSLs have been modified so that there is a Moderate and a Severe assignment, and “emergency telecommunications facilities and equipment not used for routine communications” are treated separately from “vital telecommunication facilities” in the VSLs, though emergency telecommunications facilities and equipment not used for routine communications are in fact a subset of vital communication facilities. We believe that the modified VSLs are clearer and better reflect the language in the requirement, as mandated by FERC Guideline 3. We have also removed the comma after “test.”</p>		
Georgia Transmission Corporation	No	<p>What constitutes a vital or emergency facility? Possible VSL levels--Text requirement: ...shall manage (1), alarm (2), test and or actively monitor (3).....Lower VSL: Responsible entity failed to perform any part of the requisits on one of its vital telecommunications circuits. Moderate VSL: Responsible entity failed to perform one of the requisites for all vital telecommunications. High VSL: Responsible entity failed to perform two of the requisites for all vital telecommunications. Severe VSL: Responsible entity failed to perform any of the requisites for all vital telecommunications. VSL: Responsible entity failed to perform any of the requisites on any portion of its vital communications for the requirement.</p>
<p>Response: Thank you for your comment. The DT agrees that the VSLs needed clarification, but it believes that your proposed changes could lead to additional confusion.</p> <p>The VSLs have been modified so that there is a Moderate and a Severe assignment, and “emergency telecommunications facilities and equipment not used for routine communications” are treated separately from “vital telecommunication facilities” in the VSLs, though emergency telecommunications facilities and equipment not used for routine communications are in fact a subset of vital communication facilities. We believe that the modified VSLs are clearer and better reflect the language in the requirement, as mandated by FERC Guideline 3.</p>		
American Electric Power	No	<p>While the words in the VSL reference the requirement, the language used within the requirement itself is vague, and would likely lead to subjective determination of the severity for a violation. For example, a definition is needed for “vital telecommunications facilities”.</p>
<p>Response: Thank you for your comment. It is outside the scope of this team to make any changes to the language of the requirement or define terms in the requirement.</p>		
ERCOT	Yes	
Manitoba Hydro	Yes	

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Organization	Yes or No	Question 2 Comment
Hydro-Quebec TransEnergie (NCR07112)	Yes	
IRC Standards Review Committee		
Midwest ISO Standards Collaborators		
MRO's NERC Standards Review Subcommittee		
Kansas City Power & Light		
GDS Associates, Inc		

3. Do you agree with the proposed VSL(s) modifications for COM-002-2, R1.1? If not, please offer your suggested alternative language.

Summary Consideration: Several commenters wondered why these sub-requirement VSLs had not been rolled up into the VSL of the main requirement. The DT pointed out that in the case of some older standards, in which the sub-requirements are written as though they are actual requirements, it has been deemed appropriate to write VSLs for the sub-requirement.

Other commenters requested that the word “all” in the High VSL be replaced with “at least one,” and that the VSLs should be further gradated. The DT believes that the language in the High VSL is consistent with the language in the requirement, per FERC Guideline 3. To fail to notify all Balancing Authorities or Transmission Operators would represent a complete violation of the portion of the requirement reflected in the High VSL, and thus gradation would be inappropriate.

No changes were made.

Organization	Yes or No	Question 3 Comment
Northeast Power Coordinating Council	No	<p>Consistent with NERC’s VSL Guidelines applied in the previous posting, the VSL of the sub-requirement should be incorporated into the VSL of the main requirement. Suggest the stated VSLs be “OR-ed” with the corresponding VLSs of the main requirement.</p> <p>For the High VSL, replace “all” with “at least one” and make consequential changes to avoid a problem if some but not all entities were notified. The text would read “failed to notify at least one other potentially affected Balancing Authority or Transmission Operator”</p>
<p>Response: Thank you for your comment. In the case of some older standards, in which the sub-requirements are written as though they are actual requirements, it has been deemed appropriate to write VSLs for the sub-requirement.</p> <p>The DT believes that the language in the High VSL is consistent with the language in the requirement, per FERC Guideline 3. No changes made.</p>		
Independent Electricity System Operator	No	<p>Consistent with NERC’s VSL Guidelines applied in the previous posting, the VSL of the sub-requirement should be incorporated into the VSL of the main requirement. We therefore suggest the stated VSLs be “OR ed” with the corresponding VLSs of the main requirement.</p> <p>For the High VSL, replace “all” with “at least one” and make consequential changes to avoid a problem if some but not all entities were notified. The text would read “failed to notify at least one other potentially affected Balancing Authority or Transmission Operator”</p>
<p>Response: Thank you for your comment. In the case of some older standards, in which the sub-requirements are written as though they are actual requirements, it has been deemed appropriate to write VSLs for the sub-requirement.</p>		

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Organization	Yes or No	Question 3 Comment
<p>The DT believes that the language in the High VSL is consistent with the language in the requirement, per FERC Guideline 3. To fail to notify all Balancing Authorities or Transmission Operators would represent a complete violation of the portion of the requirement reflected in the High VSL, and thus gradation would be inappropriate. No changes made.</p>		
Bonneville Power Administration	No	<p>BPA did not raise this concern with the concurrent ballot, but is raising our concern now. BPA does not believe that it is possible to monitor satellite phones, which are a common form of emergency communications. The word "vital" does not appear to be defined anywhere, so it is a little ambiguous, as is the term "special attention". There seems to be too much left to interpretation. This is a dangerous situation when combined with the higher violation severity levels. The language of the standard needs clarification to be auditable and for assessing violations.</p>
<p>Response: Thank you for your comment. Please see the DT's response to this comment under Question 2.</p>		
Midwest ISO Standards Collaborators	No	<p>To be consistent with NERC's August 10, 2009 informational filing regarding VSLs and VRFs, these VSLs should be rolled up to the main requirement.</p> <p>Furthermore, the Commission expressed in paragraph 27 of its June 19, 2008 Order on VSLs its desire for graded VSLs where possible. Clearly, it is possible to establish Lower and Moderate VSLs based on the number of Balancing Authorities and Transmission Operators notified.</p>
<p>Response: Thank you for your comment. In the case of some older standards, in which the sub-requirements are written as though they are actual requirements, it has been deemed appropriate to write VSLs for the sub-requirement.</p> <p>The DT believes that the language in the High VSL is consistent with the language in the requirement, per FERC Guideline 3. To fail to notify all Balancing Authorities or Transmission Operators would represent a complete violation of the portion of the requirement reflected in the High VSL, and thus gradation would be inappropriate. No changes made.</p>		
Kansas City Power & Light	No	<p>To be consistent with NERC's August 10, 2009 informational filing regarding VSLs and VRFs, these VSLs should be rolled up to the main requirement.</p> <p>Furthermore, the Commission expressed in paragraph 27 of its June 19, 2008 Order on VSLs its desire for graded VSLs where possible. Clearly, it is possible to establish Lower and Moderate VSLs based on the number of Balancing Authorities and Transmission Operators notified.</p>
<p>Response: Thank you for your comment. In the case of some older standards, in which the sub-requirements are written as though they are actual requirements, it has been deemed appropriate to write VSLs for the sub-requirement.</p> <p>The DT believes that the language in the High VSL is consistent with the language in the requirement, per FERC Guideline 3. To fail to notify all Balancing</p>		

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Organization	Yes or No	Question 3 Comment
		<p>Authorities or Transmission Operators would represent a complete violation of the portion of the requirement reflected in the High VSL, and thus gradation would be inappropriate. No changes made.</p>
<p>IRC Standards Review Committee</p>	<p>No</p>	<p>To be consistent with NERC's August 10, 2009 informational filing regarding VSLs and VRFs, these VSLs should be rolled up to the main requirement.</p> <p>Furthermore, the Commission expressed in paragraph 27 of its June 19, 2008 Order on VSLs its desire for gradated VSLs where possible. Clearly, it is possible to establish Lower and Moderate VSLs based on the number of Balancing Authorities and Transmission Operators notified.</p>
<p>Response: Thank you for your comment. In the case of some older standards, in which the sub-requirements are written as though they are actual requirements, it has been deemed appropriate to write VSLs for the sub-requirement.</p> <p>The DT believes that the language in the High VSL is consistent with the language in the requirement, per FERC Guideline 3. To fail to notify all Balancing Authorities or Transmission Operators would represent a complete violation of the portion of the requirement reflected in the High VSL, and thus gradation would be inappropriate. No changes made.</p>		
<p>MRO's NERC Standards Review Subcommittee</p>	<p>No</p>	<p>To be consistent with NERC's August 10, 2009 informational filing regarding VSLs and VRFs, these VSLs should be rolled up to the main requirement.</p> <p>Furthermore, the Commission expressed in paragraph 27 of its June 19, 2008 Order on VSLs its desire for gradated VSLs where possible. Clearly, it is possible to establish Lower and Moderate VSLs based on the number of Balancing Authorities and Transmission Operators notified.</p>
<p>Response: Thank you for your comment. In the case of some older standards, in which the sub-requirements are written as though they are actual requirements, it has been deemed appropriate to write VSLs for the sub-requirement.</p> <p>The DT believes that the language in the High VSL is consistent with the language in the requirement, per FERC Guideline 3. To fail to notify all Balancing Authorities or Transmission Operators would represent a complete violation of the portion of the requirement reflected in the High VSL, and thus gradation would be inappropriate. No changes made.</p>		
<p>Georgia System Operations Corporation</p>	<p>No</p>	<p>This VSL places a HIGH VSL on failure to notify the affected BAs and TOPs and a SERVER VSL on failure to notify the responsible entity's RC making this requirement almost binary (FERC Guideline 2).Recommend:Lower VSL: Leave blankModerate VSL: Notified RC, but failed to notify one or more affected BAs OR one or more affected TOPs.High VSL: Notified RC, but failed to notify one or more affected BAs AND one or more affected TOPs.Severe VSL: Failed to notify the RC AND failed to notify one or more affected BAs AND one or more TOPs.</p>

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Organization	Yes or No	Question 3 Comment
<p>Response: Thank you for your comment. The DT believes that the language in the VSLs is consistent with the language in the requirement, per FERC Guideline 3. To fail to notify all Balancing Authorities or Transmission Operators would represent a complete violation of the portion of the requirement reflected in the High VSL, and thus gradation would be inappropriate. No changes made.</p>		
Georgia Transmission Corporation	No	Severity levels are presented as binary and not gradient. Any load that is shed, either manually or by automatic UFLS/UVLS schemes is usually firm load. Should the word "firm" be "manual" or "forced"?
<p>Response: Thank you for your comment. The requirement uses the word "firm" with respect to load shedding, and the VSL language reflects that language, per FERC Guideline 3. No change made.</p>		
American Electric Power	Yes	
Hydro-Quebec TransEnergie (NCR07112)	Yes	
ERCOT	Yes	
Manitoba Hydro	Yes	
GDS Associates, Inc		

4. Do you agree with the proposed VSL(s) modifications for FAC-003-1, R1.2.2.1? If not, please offer your suggested alternative language.

Summary Consideration: Most commenters supported the VSL as written. Two commenters recommended that the VSL for the sub-requirement be incorporated into the VSL of the main requirement, as in other standards. The DT responded that for some older standards, the sub-requirements are written as though they are actual requirements, and that it is appropriate to have VSLs for the sub-requirement in those cases. One commenter suggested a language change that the DT found unnecessary. No changes were made.

Organization	Yes or No	Question 4 Comment
Northeast Power Coordinating Council	No	Consistent with NERC’s VSL Guidelines applied in the previous posting, the VSL of the sub-requirement should be incorporated into the VSL of the main requirement. Suggest the stated VSLs be “OR-ed” with the corresponding VSLs of the main requirement.
Response: Thank you for your comment. In the case of some older standards, in which the sub-requirements are written as though they are actual requirements, it has been deemed appropriate to write VSLs for the sub-requirement. In this case, the DT believes it makes more sense to leave the VSLs as they are.		
Independent Electricity System Operator	No	Consistent with NERC’s VSL Guidelines applied in the previous posting, the VSL of the sub-requirement should be incorporated into the VSL of the main requirement. We therefore suggest the stated VSLs be “OR ed” with the corresponding VLSs of the main requirement.
Response: Thank you for your comment. In the case of some older standards, in which the sub-requirements are written as though they are actual requirements, it has been deemed appropriate to write VSLs for the sub-requirement. In this case, the DT believes it makes more sense to leave the VSLs as they are.		
GDS Associates, Inc	Yes	Suggest changing as in “Where transmission system transient overvoltage factors were not known, clearances were not derived from Table 5, IEEE 516-2003, phase-to-ground distances, nor the appropriate altitude correction factors were applied”.
Response: Thank you for your comment. The DT believes it is appropriate for the Severe VSL to apply whether the entity did not apply Table 5 or incorrectly applied it. No change made.		
Bonneville Power Administration	Yes	

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Organization	Yes or No	Question 4 Comment
Manitoba Hydro	Yes	
American Electric Power	Yes	
Hydro-Quebec TransEnergie (NCR07112)	Yes	
Georgia Transmission Corporation		Abstain. The VSL is binary and should not hedge the issue. Minimum clearances for transmission system overvoltage did not meet or exceed values derived from Table 5, IEEE 516-2003 phase-to-ground distances, with appropriate altitude correction factors.
Response: Thank you for your comment.		
IRC Standards Review Committee		
Midwest ISO Standards Collaborators		
Kansas City Power & Light		
Georgia System Operations Corporation		
MRO's NERC Standards Review Subcommittee		
ERCOT		

5. Do you agree with the proposed VSL(s) modifications for IRO-004-1, R1? If not, please offer your suggested alternative language.

Summary Consideration: Some commenters preferred the previous VSLs, which cited number of days missed; some were concerned with the treatment of the term “analyses;” and some suggested that the VSLs be gradated. The DT does not agree that the previous VSLs, which cited number of days missed, were satisfactory. The previous VSLs violated FERC Guideline 4 because they were based on cumulative violations, rather than a single violation. The DT interprets the plural “analyses” as referring to multiple analyses performed as part of a single overall next-day reliability analysis.

One commenter also suggested referring to the requirement in the VSL rather than restating the language in the requirement, but the DT believes it is clearer to leave the VSLs as written. No changes were made with respect to the above suggestions.

The DT did elect to gradate the VSL assignments so that there is a High VSL and a Severe VSL. The High VSL applies when one part of the requirement is not completed (failure to conduct next-day reliability analyses OR failure to conduct Contingency analysis studies), and the Severe VSL applies when both parts of the requirement are not completed. The DT believes this better reflects the requirement, along with FERC’s desire for gradated VSLs where possible.

Organization	Yes or No	Question 5 Comment
Northeast Power Coordinating Council	No	For the Severe VSL, “or” should be replaced by “OR” to make it clear that what follows is a second part to the VSL and “contingency” (following “or”) should be capitalized.
<p>Response: Thank you for your comment. The VSLs have now been gradated so that there is a High VSL and a Severe VSL (each with two parts, with the High VSL separated by “OR” and the Severe VSL separated by “AND”). The High VSL applies when one part of the requirement is not completed (failure to conduct next-day reliability analyses OR failure to conduct Contingency analysis studies), and the Severe VSL applies when both parts of the requirement are not completed.</p>		
Independent Electricity System Operator	No	For the Severe VSL, “or” should be replaced by “OR” to make it clear that what follows is a second part to the VSL and “contingency” (following “or”) should be capitalized.
<p>Response: Thank you for your comment. The VSLs have now been gradated so that there is a High VSL and a Severe VSL (each with two parts, with the High VSL separated by “OR” and the Severe VSL separated by “AND”). The High VSL applies when one part of the requirement is not completed (failure to conduct next-day reliability analyses OR failure to conduct Contingency analysis studies), and the Severe VSL applies when both parts of the requirement are not completed.</p>		
Midwest ISO Standards	No	The original VSLs for the number of days missed were satisfactory and met FERC conditions because the requirement talks about reliability analyses which is plural. Thus, all analyses are to be considered in

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Organization	Yes or No	Question 5 Comment
Collaborators		<p>aggregate. To do otherwise would be equivalent to changing analyses to analysis in the requirement which would violate a FERC guideline 3.</p> <p>Furthermore, the Commission expressed in paragraph 27 of its June 19, 2008 Order on VSLs its desire for gradated VSLs where possible. Gradated VSLs could be written based on whether all SOLs, IROLs, contingencies, etc. are included in the analysis.</p>
<p>Response: Thank you for your comment. The DT does not agree that the previous VSLs, which cited number of days missed, were satisfactory. The original VSLs represented a violation of FERC Guideline 4 because they were based on a cumulative number of violations rather than a single violation. Further, the SDT interprets the plural “analyses” as referring to multiple analyses performed as part of a single overall next-day reliability analysis. Thus, it does agree with the commenter’s concern about the issues with the term “analyses.”</p> <p>The DT did elect to grade the VSL assignments so that there is a High VSL and a Severe VSL. The High VSL applies when one part of the requirement is not completed (failure to conduct next-day reliability analyses OR failure to conduct Contingency analysis studies), and the Severe VSL applies when both parts of the requirement are not completed. The DT believes this better reflects the requirement, along with FERC’s desire for gradated VSLs where possible.</p>		
IRC Standards Review Committee	No	<p>The original VSLs for the number of days missed were satisfactory and met FERC conditions because the requirement talks about reliability analyses which is plural. Thus, all analyses are to be considered in aggregate. To do otherwise would be equivalent to changing analyses to analysis in the requirement which would violate a FERC guideline 3.</p> <p>Furthermore, the Commission expressed in paragraph 27 of its June 19, 2008 Order on VSLs its desire for gradated VSLs where possible. Gradated VSLs could be written based on whether all SOLs, IROLs, contingencies, etc. are included in the analysis.</p>
<p>Response: Thank you for your comment. The DT does not agree that the previous VSLs, which cited number of days missed, were satisfactory. The original VSLs represented a violation of FERC Guideline 4 because they were based on a cumulative number of violations rather than a single violation. Further, the SDT interprets the plural “analyses” as referring to multiple analyses performed as part of a single overall next-day reliability analysis. Thus, it does agree with the commenter’s concern about the issues with the term “analyses.”</p> <p>The DT did elect to grade the VSL assignments so that there is a High VSL and a Severe VSL. The High VSL applies when one part of the requirement is not completed (failure to conduct next-day reliability analyses OR failure to conduct Contingency analysis studies), and the Severe VSL applies when both parts of the requirement are not completed. The DT believes this better reflects the requirement, along with FERC’s desire for gradated VSLs where possible.</p>		
MRO's NERC Standards Review Subcommittee	No	<p>The original VSLs for the number of days missed were satisfactory and met FERC conditions because the requirement talks about reliability analyses which is plural. Thus, all analyses are to be considered in aggregate. To do otherwise would be equivalent to changing analyses to analysis in the requirement which</p>

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Organization	Yes or No	Question 5 Comment
		<p>would violate a FERC guideline 3.</p> <p>Furthermore, the Commission expressed in paragraph 27 of its June 19, 2008 Order on VSLs its desire for gradated VSLs where possible. Gradated VSLs could be written based on whether all SOLs, IROLs, contingencies, etc. are included in the analysis.</p>
<p>Response: Thank you for your comment. The DT does not agree that the previous VSLs, which cited number of days missed, were satisfactory. The original VSLs represented a violation of FERC Guideline 4 because they were based on a cumulative number of violations rather than a single violation. Further, the SDT interprets the plural “analyses” as referring to multiple analyses performed as part of a single overall next-day reliability analysis. Thus, it does agree with the commenter’s concern about the issues with the term “analyses.”</p> <p>The DT did elect to gradate the VSL assignments so that there is a High VSL and a Severe VSL. The High VSL applies when one part of the requirement is not completed (failure to conduct next-day reliability analyses OR failure to conduct Contingency analysis studies), and the Severe VSL applies when both parts of the requirement are not completed. The DT believes this better reflects the requirement, along with FERC’s desire for gradated VSLs where possible.</p>		
Kansas City Power & Light	No	<p>The original VSLs for the number of days missed were satisfactory and met FERC conditions because the requirement talks about reliability analyses which is plural. Thus, all analyses are to be considered in aggregate. To do otherwise would be equivalent to changing analyses to analysis in the requirement which would violate a FERC guideline 3.</p> <p>Furthermore, the Commission expressed in paragraph 27 of its June 19, 2008 Order on VSLs its desire for gradated VSLs where possible. Gradated VSLs could be written based on whether all SOLs, IROLs, contingencies, etc. are included in the analysis.</p>
<p>Response: Thank you for your comment. The DT does not agree that the previous VSLs, which cited number of days missed, were satisfactory. The original VSLs represented a violation of FERC Guideline 4 because they were based on a cumulative number of violations rather than a single violation. Further, the SDT interprets the plural “analyses” as referring to multiple analyses performed as part of a single overall next-day reliability analysis. Thus, it does agree with the commenter’s concern about the issues with the term “analyses.”</p> <p>The DT did elect to gradate the VSL assignments so that there is a High VSL and a Severe VSL. The High VSL applies when one part of the requirement is not completed (failure to conduct next-day reliability analyses OR failure to conduct Contingency analysis studies), and the Severe VSL applies when both parts of the requirement are not completed. The DT believes this better reflects the requirement, along with FERC’s desire for gradated VSLs where possible.</p>		
ERCOT	No	<p>The existing VSLs provide a means to gradate severity levels without compromising the intent of the requirement. The existing VSLs are not unreasonable and appear to comply with FERC’s guidance to establish gradated VSLs, where possible.</p>
<p>Response: Thank you for your comment. The DT has gradated the VSL assignments so that there is a High VSL and a Severe VSL. The High VSL applies when</p>		

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Organization	Yes or No	Question 5 Comment
<p>one part of the requirement is not completed (failure to conduct next-day reliability analyses OR failure to conduct Contingency analysis studies), and the Severe VSL applies when both parts of the requirement are not completed. The DT believes this better reflects the requirement, along with FERC's desire for graded VSLs where possible.</p>		
American Electric Power	Yes	<p>Rather than making the VSL so lengthy by referencing the entire standard, we recommend that the VSL simply reference the requirement itself. The VSL would be much easier to follow if the requirement is referenced, rather than re-quoted unnecessarily.</p>
<p>Response: Thank you for your comment. The DT believes it is clearer to write out the language of the requirement than to simply reference the requirement.</p>		
Hydro-Quebec TransEnergie (NCR07112)	Yes	
Manitoba Hydro	Yes	
Bonneville Power Administration	Yes	
Georgia Transmission Corporation		<p>Abstain. The severity level is binary and simply restates the requirement.</p>
<p>Response: Thank you for your comment. Note that we have graded the VSLs so that there is now both a High and a Severe assignment.</p>		
Georgia System Operations Corporation		
GDS Associates, Inc		

6. Do you agree with the proposed VSL(s) modifications for IRO-004-1, R3? If not, please offer your suggested alternative language.

Summary Consideration: Some commenters suggested changing “reducing” to “reduction of,” but that would represent a deviation from the language in the requirement.

Other commenters stated that the proposed VSLs are a violation of FERC Guideline 3 and were concerned with the way “action plans” were referenced in the VSLs, but the DT disagrees with these commenters’ assessments. The language in the VSL almost exactly mirrors the language in the requirement: The emphasis in the requirement is on whether the system was returned to within acceptable SOLs or IROLs. When it comes to determining violations, the system was either returned to within these limits or it was not, regardless of whether one or multiple action plan(s) were missed. Thus, the DT believes the binary VSL assignment is appropriate.

Finally, one commenter suggested referring to the requirement in the VSL rather than restating the language in the requirement, but the DT believes it is clearer to leave the VSLs as written.

No changes were made.

Organization	Yes or No	Question 6 Comment
Northeast Power Coordinating Council	No	For the Severe VSL, replace “reducing” with “reduction of”.
Response: Thank you for your comment. The section you refer to mirrors the language in the requirement. No change made.		
Midwest ISO Standards Collaborators	No	The proposed VSLs violates FERC guideline 3 as it changes the requirement. The requirement is written to consider all action plans in aggregate by using action plans in the plural form. Thus, considering each action a separate violation is equivalent to changing “action plans” to “action plan” in the requirement.
Response: Thank you for your comment. The DT does not believe that the VSL is a violation of FERC Guideline 3, for the language in the VSL almost exactly mirrors the language in the requirement. The emphasis in the requirement is on whether the system was returned to within acceptable SOLs or IROLs. When it comes to determining violations, the system was either returned to within these limits or it was not, regardless of whether one or multiple action plan(s) were missed. Thus, the DT believes the binary VSL assignment is appropriate. No change made.		
IRC Standards Review Committee	No	The proposed VSLs violates FERC guideline 3 as it changes the requirement. The requirement is written to consider all action plans in aggregate by using action plans in the plural form. Thus, considering each action a separate violation is equivalent to changing “action plans” to “action plan” in the requirement.

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Organization	Yes or No	Question 6 Comment
<p>Response: Thank you for your comment. The DT does not believe that the VSL is a violation of FERC Guideline 3, for the language in the VSL almost exactly mirrors the language in the requirement. The emphasis in the requirement is on whether the system was returned to within acceptable SOLs or IROLs. When it comes to determining violations, the system was either returned to within these limits or it was not, regardless of whether one or multiple action plan(s) were missed. Thus, the DT believes the binary VSL assignment is appropriate. No change made.</p>		
MRO's NERC Standards Review Subcommittee	No	The proposed VSLs violate FERC guideline 3 as it changes the requirement. The requirement is written to consider all action plans in aggregate by using action plans in the plural form. Thus, considering each action a separate violation is equivalent to changing “action plans” to “action plan” in the requirement.
<p>Response: Thank you for your comment. The DT does not believe that the VSL is a violation of FERC Guideline 3, for the language in the VSL almost exactly mirrors the language in the requirement. The emphasis in the requirement is on whether the system was returned to within acceptable SOLs or IROLs. When it comes to determining violations, the system was either returned to within these limits or it was not, regardless of whether one or multiple action plan(s) were missed. Thus, the DT believes the binary VSL assignment is appropriate. No change made.</p>		
Kansas City Power & Light	No	The proposed VSLs violates FERC guideline 3 as it changes the requirement. The requirement is written to consider all action plans in aggregate by using action plans in the plural form. Thus, considering each action a separate violation is equivalent to changing “action plans” to “action plan” in the requirement.
<p>Response: Thank you for your comment. The DT does not believe that the VSL is a violation of FERC Guideline 3, for the language in the VSL almost exactly mirrors the language in the requirement. The emphasis in the requirement is on whether the system was returned to within acceptable SOLs or IROLs. When it comes to determining violations, the system was either returned to within these limits or it was not, regardless of whether one or multiple action plan(s) were missed. Thus, the DT believes the binary VSL assignment is appropriate. No change made.</p>		
ERCOT	No	The existing VSLs provide a means to gradate severity levels without compromising the intent of the requirement. The existing VSLs are not unreasonable and appear to comply with FERC's guidance to establish gradated VSLs, where possible.
<p>Response: Thank you for your comment. The emphasis in the requirement is on whether the system was returned to within acceptable SOLs or IROLs. When it comes to determining violations, the system was either returned to within these limits or it was not, regardless of whether one or multiple action plan(s) were missed. Thus, the DT believes the binary VSL assignment is appropriate. The VSLs as previously written and gradated were based on cumulative violations rather than a single violation, which violated FERC Guideline 4. No change made.</p>		
Independent Electricity System Operator	No	For the Severe VSL, replace “reducing” with “reduction of”

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Organization	Yes or No	Question 6 Comment
<p>Response: Thank you for your comment. The section you refer to mirrors the language in the requirement. No change made.</p>		
Hydro-Quebec TransEnergie (NCR07112)	Yes	Editorial must be consistent
<p>Response: Thank you for your comment.</p>		
American Electric Power	Yes	Rather than making the VSL so lengthy by referencing the entire standard, we recommend that the VSL simply reference the requirement itself. The VSL would be much easier to follow if the requirement is referenced, rather than re-quoted unnecessarily.
<p>Response: Thank you for your comment. The DT believes it is clearer to write out the language of the requirement than to simply reference the requirement.</p>		
Manitoba Hydro	Yes	
Bonneville Power Administration	Yes	
Georgia System Operations Corporation		
Georgia Transmission Corporation		
GDS Associates, Inc		

7. Do you agree with the proposed VSL(s) modifications for IRO-004-1, R4? If not, please offer your suggested alternative language.

Summary Consideration: Several commenters pointed out that the VSLs as written left timing gaps, and the VSL language was modified as suggested.

Some commenters found the second part of the Severe VSL to be extraneous, but the DT disagrees; the two parts of the Severe assignment necessarily distinguish between an entity that provided “said information” but did so more than three hours after the required time and an entity that never provided the information. No change was made.

Organization	Yes or No	Question 7 Comment
Northeast Power Coordinating Council	No	For the Lower VSL we suggest replacing “provided after the required time (but not more than one hour after the required time)” with “provided up to one hour after the required time.” For the Moderate VSL we suggest the sentence structure “more than one hour and up to (and including) two hours after the required time.” A similar structure is suggested for the High VSL.
Response: Thank you for your comment. Change made.		
Independent Electricity System Operator	No	For the Lower VSL we suggest replacing “provided after the required time (but not more than one hour after the required time)” with “provided up to one hour after the required time.” For the Moderate VSL we suggest the sentence structure “more than one hour and up to (and including) two hours after the required time.” A similar structure is suggested for the High VSL.
Response: Thank you for your comment. Change made.		
Midwest ISO Standards Collaborators	No	Based on the wording, exactly one hour, two hours and three hours are excluded from the VSLs. This is a gap that should be fixed.
Response: Thank you for your comment. The gap has been closed.		
IRC Standards Review Committee	No	Based on the wording, exactly one hour, two hours and three hours are excluded from the VSLs. This is a gap that should be fixed.
Response: Thank you for your comment. The gap has been closed.		

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Organization	Yes or No	Question 7 Comment
MRO's NERC Standards Review Subcommittee	No	Based on the wording, exactly one hour, two hours and three hours are excluded from the VSLs. This is a gap that should be fixed.
Response: Thank you for your comment. The gap has been closed.		
Kansas City Power & Light	No	Based on the wording, exactly one hour, two hours and three hours are excluded from the VSLs. This is a gap that should be fixed.
Response: Thank you for your comment. The gap has been closed.		
Georgia System Operations Corporation	No	The second part of the Severe VSL following the "OR" is unnecessary. Consider removing. If needed, close the time interval in the first part.
Response: Thank you for your comment. The DT disagrees; the two parts of the Severe assignment distinguish between an entity that provided "said information" but did so more than three hours after the required time and an entity that never provided the information. No change made.		
Georgia Transmission Corporation	No	Last part of Severe VSL is extraneous. Change the time interval in the paragraph to state "provided the information after the required three hour maximum".
Response: Thank you for your comment. The DT disagrees; the two parts of the Severe assignment distinguish between an entity that provided "said information" but did so more than three hours after the required time and an entity that never provided the information. No change made.		
Hydro-Quebec TransEnergie (NCR07112)	Yes	Editorial must be consistent
Response: Thank you for your comment.		
Manitoba Hydro	Yes	
American Electric Power	Yes	
Bonneville Power Administration	Yes	
ERCOT		

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Organization	Yes or No	Question 7 Comment
GDS Associates, Inc		

8. Do you agree with the proposed VSL(s) modifications for IRO-004-1, R5? If not, please offer your suggested alternative language.

Summary Consideration: Several commenters noted that the use of the term “information” in the Moderate, High, and Severe VSLs was inconsistent with the requirement language. “Information” was changed to “results.”

Some commenters suggested clarifying the timing portion of the VSLs and avoiding gaps by using the same language as in IRO-004-1, R4. The DT agreed and made this change.

Finally, several commenters felt the phrase “unless circumstances warrant otherwise” should be incorporated into the timing portion of the requirement. The DT believes that if “circumstances warranted otherwise” and there was a reason that the results were not provided within the specified timeframe, there would be no violation and the VSLs would not need to be consulted. VSLs are to be used only *after* a violation has been found. Thus, no change made in that respect.

Organization	Yes or No	Question 8 Comment
Northeast Power Coordinating Council	No	<p>For consistency in language across all VSLs of this requirement, “information” in the Moderate, High and Severe VSLs should be changed to “results”.</p> <p>We also suggest a sentence structure for the Lower, Moderate and High VSLs similar to what was proposed in our response to Q7.</p>
<p>Response: Thank you for your comment. “Information” has been changed to “results” in the Moderate, High, and Severe VSLs.</p> <p>We have also modified the language regarding timing to make the VSLs clearer and avoid gaps at exactly one hour, exactly two hours, etc., as in IRO-004-1, R4.</p>		
Independent Electricity System Operator	No	<p>For consistency in language across all VSLs of this requirement, “information” in the Moderate, High and Severe VSLs should be changed to “results”.</p> <p>We also suggest a sentence structure for the Lower, Moderate and High VSLs similar to what was proposed in our response to Q7.</p>
<p>Response: Thank you for your comment. “Information” has been changed to “results” in the Moderate, High, and Severe VSLs.</p> <p>We have also modified the language regarding timing to make the VSLs clearer and avoid gaps at exactly one hour, exactly two hours, etc., as in IRO-004-1, R4.</p>		
Midwest ISO Standards	No	<p>Commission guideline 3 is violated for these VSLs as they deviate from the requirement. As the VSLs are written, they imply that the Reliability Coordinator is in violation of the requirement any time it makes its</p>

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Organization	Yes or No	Question 8 Comment
Collaborators		<p>results available later than 1500 CST in the Eastern Interconnection. This, in fact, is not the case. The only time the Reliability Coordinator would be in violation of such a situation is if circumstances did not warrant the tardiness. In fact, it is possible that the Reliability Coordinator could be late with the results every day as long as circumstances warranted. An obvious circumstance that would warrant the tardiness is the responsible entities in IRO-004-1 R4 violating that requirement by providing the data late to the Reliability Coordinator. All VSLs need to include the language “unless circumstances warrant otherwise” that is included in the requirement.</p> <p>For consistency in language across all VSLs and with the requirement, “information” in the Moderate, High and Severe VSLs should be changed to “results”.</p>
<p>Response: Thank you for your comment. If “circumstances warranted otherwise” and there was a reason that the results were not provided within the specified timeframe, there would be no violation and the VSLs would not need to be consulted. VSLs are to be used only <i>after</i> a violation has been found. No change made in that respect.</p> <p>“Information” has been changed to “results” in the Moderate, High, and Severe VSLs.</p>		
IRC Standards Review Committee	No	<p>Commission guideline 3 is violated for these VSLs as they deviate from the requirement. As the VSLs are written, they imply that the Reliability Coordinator is in violation of the requirement any time it makes its results available later than 1500 CST in the Eastern Interconnection. This, in fact, is not the case. The only time the Reliability Coordinator would be in violation of such a situation is if circumstances did not warrant the tardiness. In fact, it is possible that the Reliability Coordinator could be late with the results every day as long as circumstances warranted. An obvious circumstance that would warrant the tardiness is the responsible entities in IRO-004-1 R4 violating that requirement by providing the data late to the Reliability Coordinator. All VSLs need to include the language “unless circumstances warrant otherwise” that is included in the requirement.</p> <p>For consistency in language across all VSLs and with the requirement, “information” in the Moderate, High and Severe VSLs should be changed to “results”.</p>
<p>Response: Thank you for your comment. If “circumstances warranted otherwise” and there was a reason that the results were not provided within the specified timeframe, there would be no violation and the VSLs would not need to be consulted. VSLs are to be used only <i>after</i> a violation has been found. No change made in that respect.</p> <p>“Information” has been changed to “results” in the Moderate, High, and Severe VSLs.</p>		
MRO's NERC Standards Review Subcommittee	No	<p>Commission guideline 3 is violated for these VSLs as they deviate from the requirement. As the VSLs are written, they imply that the Reliability Coordinator is in violation of the requirement any time it makes its</p>

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Organization	Yes or No	Question 8 Comment
		<p>results available later than 1500 CST in the Eastern Interconnection. This, in fact, is not the case. The only time the Reliability Coordinator would be in violation of such a situation is if circumstances did not warrant the tardiness. In fact, it is possible that the Reliability Coordinator could be late with the results every day as long as circumstances are warranted. An obvious circumstance that would warrant the tardiness is the responsible entities in IRO-004-1 R4 violating that requirement by providing the data late to the Reliability Coordinator. All VSLs need to include the language “unless circumstances warrant otherwise” that is included in the requirement.</p> <p>For consistency in language across all VSLs and with the requirement, “information” in the Moderate, High and Severe VSLs should be changed to “results”.</p>
<p>Response: Thank you for your comment. If “circumstances warranted otherwise” and there was a reason that the results were not provided within the specified timeframe, there would be no violation and the VSLs would not need to be consulted. VSLs are to be used only <i>after</i> a violation has been found. No change made in that respect.</p> <p>“Information” has been changed to “results” in the Moderate, High, and Severe VSLs.</p>		
Kansas City Power & Light	No	<p>Commission guideline 3 is violated for these VSLs as they deviate from the requirement. As the VSLs are written, they imply that the Reliability Coordinator is in violation of the requirement any time it makes its results available later than 1500 CST in the Eastern Interconnection. This, in fact, is not the case. The only time the Reliability Coordinator would be in violation of such a situation is if circumstances did not warrant the tardiness. In fact, it is possible that the Reliability Coordinator could be late with the results every day as long as circumstances are warranted. An obvious circumstance that would warrant the tardiness is the responsible entities in IRO-004-1 R4 violating that requirement by providing the data late to the Reliability Coordinator. All VSLs need to include the language “unless circumstances warrant otherwise” that is included in the requirement.</p> <p>For consistency in language across all VSLs and with the requirement, “information” in the Moderate, High and Severe VSLs should be changed to “results”.</p>
<p>Response: Thank you for your comment. If “circumstances warranted otherwise” and there was a reason that the results were not provided within the specified timeframe, there would be no violation and the VSLs would not need to be consulted. VSLs are to be used only <i>after</i> a violation has been found. No change made in that respect.</p> <p>“Information” has been changed to “results” in the Moderate, High, and Severe VSLs.</p>		
Hydro-Quebec TransEnergie (NCR07112)	Yes	Editorial must be consistent

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Organization	Yes or No	Question 8 Comment
Response: Thank you for your comment.		
Manitoba Hydro	Yes	
American Electric Power	Yes	
Bonneville Power Administration	Yes	
Georgia Transmission Corporation		Abstain.
ERCOT		
Georgia System Operations Corporation		
GDS Associates, Inc		

9. Do you agree with the proposed VSL(s) modifications for IRO-006-4.1, R3? If not, please offer your suggested alternative language.

Summary Consideration: Several commenters suggested that the first part of the Severe VSL be moved to Lower because “if a Reliability Coordinator uses an unapproved [but] effective substitute procedure, they have still achieved the intent of the requirement.” The DT disagrees, because if a Reliability Coordinator uses a substitute procedure that was not approved by the ERO, the full intent of the requirement has been missed.

Similarly, one commenter suggested the VSLs be gradated, but if a Reliability Coordinator is neither following the curtailments as directed by the Interconnection-wide agreement nor using an ERO-approved substitute procedure, the full intent of the requirement has been missed.

The DT believes the requirement is appropriate for a binary VSL assignment, and no changes were made.

Organization	Yes or No	Question 9 Comment
Midwest ISO Standards Collaborators	No	The first part of the Severe VSL should be moved to Lower. If a Reliability Coordinator uses an unapproved by effective substitute procedure, they still have achieved the intent of the requirement.
<p>Response: Thank you for your comment. The DT disagrees. If a Reliability Coordinator is using a substitute procedure that was not approved by the ERO, the full intent of the requirement has been missed. No change made.</p>		
IRC Standards Review Committee	No	The first part of the Severe VSL should be moved to Lower. If a Reliability Coordinator uses an unapproved by effective substitute procedure, they still have achieved the intent of the requirement.
<p>Response: Thank you for your comment. The DT disagrees. If a Reliability Coordinator is using a substitute procedure that was not approved by the ERO, the full intent of the requirement has been missed. No change made.</p>		
MRO's NERC Standards Review Subcommittee	No	The first part of the Sever VSL should be moved to Lower. If a Reliability Coordinator uses an unapproved but effective substitute procedure, they still have achieved the intent of the requirement.
<p>Response: Thank you for your comment. The DT disagrees. If a Reliability Coordinator is using a substitute procedure that was not approved by the ERO, the full intent of the requirement has been missed. No change made.</p>		
Kansas City Power & Light	No	The first part of the Sever VSL should be moved to Lower. If a Reliability Coordinator uses an unapproved by

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Organization	Yes or No	Question 9 Comment
		effective substitute procedure, they still have achieved the intent of the requirement.
<p>Response: Thank you for your comment. The DT disagrees. If a Reliability Coordinator is using a substitute procedure that was not approved by the ERO, the full intent of the requirement has been missed. No change made.</p>		
ERCOT	No	There appears to be an opportunity to establish gradated severity levels, as opposed to having all violations of the requirement be severe. The existing severe VSL language can be moved to a lower severity level than the newly proposed language.
<p>Response: Thank you for your comment. The DT disagrees. If a Reliability Coordinator is neither following the curtailments as directed by the Interconnection-wide agreement nor using an ERO-approved substitute procedure, the full intent of the requirement has been missed. No change made.</p>		
Manitoba Hydro	Yes	
American Electric Power	Yes	
Hydro-Quebec TransEnergie (NCR07112)	Yes	
Bonneville Power Administration	Yes	
Independent Electricity System Operator	Yes	
Northeast Power Coordinating Council	Yes	
Georgia Transmission Corporation		Abstain.
Georgia System Operations Corporation		
GDS Associates, Inc		

10. Do you agree with the proposed VSL(s) modifications for PRC-001-1, R1? If not, please offer your suggested alternative language.

Summary Consideration: Commenters expressed concern with the requirement itself, and noted that appropriate VSLs cannot be written for such an ambiguous requirement. It is outside the scope of this team to make changes to the standard itself, and some commenters’ suggested changes (i.e. “familiar” is too vague) would represent a violation of FERC Guideline 3.

The DT reminded commenters that PRC-001 is undergoing significant revision as part of Project 2007-06—System Protection Coordination and encouraged them to follow along with that project to ensure that their concerns are addressed.

Organization	Yes or No	Question 10 Comment
Bonneville Power Administration	No	BPA believes that this requirement is so ambiguous that it is difficult to agree with any VSL that is developed. An interpretation for this requirement was rejected overwhelmingly last March. We haven't seen any further work on that interpretation. Until we get some guidance on who within the responsible entity is responsible for being familiar with the purpose and limitations of protection systems applied in its area, what it means to be familiar with these, and what is meant by "limitations", it is frightening to associate high and severe VSL's with this requirement.
<p>Response: Thank you for your comment. It is outside the scope of this team to make any changes to the standard itself. PRC-001 is, however, undergoing significant revision as part of Project 2007-06—System Protection Coordination: http://www.nerc.com/filez/standards/System_Protection_Project_2007-06.html. We encourage you to follow along with that project to ensure that your concerns are addressed.</p>		
Midwest ISO Standards Collaborators	No	This is a poor requirement that needs to be rewritten or retired. As a result, it is impossible to write quality VSLs for this requirement.
<p>Response: Thank you for your comment. It is outside the scope of this team to make any changes to the standard itself. PRC-001 is, however, undergoing significant revision as part of Project 2007-06—System Protection Coordination: http://www.nerc.com/filez/standards/System_Protection_Project_2007-06.html. We encourage you to follow along with that project to ensure that your concerns are addressed.</p>		
IRC Standards Review Committee	No	This is a poor requirement that needs to be rewritten or retired. As a result, it is impossible to write quality VSLs for this requirement.
<p>Response: Thank you for your comment. It is outside the scope of this team to make any changes to the standard itself. PRC-001 is, however, undergoing significant revision as part of Project 2007-06—System Protection Coordination: http://www.nerc.com/filez/standards/System_Protection_Project_2007-06.html.</p>		

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Organization	Yes or No	Question 10 Comment
<p>We encourage you to follow along with that project to ensure that your concerns are addressed.</p>		
<p>MRO's NERC Standards Review Subcommittee</p>	<p>No</p>	<p>This is a poor requirement that needs to be rewritten or retired. As a result, it is impossible to write quality VSLs for this requirement.</p>
<p>Response: Thank you for your comment. It is outside the scope of this team to make any changes to the standard itself. PRC-001 is, however, undergoing significant revision as part of Project 2007-06—System Protection Coordination: http://www.nerc.com/filez/standards/System_Protection_Project_2007-06.html. We encourage you to follow along with that project to ensure that your concerns are addressed.</p>		
<p>Kansas City Power & Light</p>	<p>No</p>	<p>This is a poor requirement that needs to be rewritten or retired. As a result, it is impossible to write quality VSLs for this requirement.</p>
<p>Response: Thank you for your comment. It is outside the scope of this team to make any changes to the standard itself. PRC-001 is, however, undergoing significant revision as part of Project 2007-06—System Protection Coordination: http://www.nerc.com/filez/standards/System_Protection_Project_2007-06.html. We encourage you to follow along with that project to ensure that your concerns are addressed.</p>		
<p>Manitoba Hydro</p>	<p>No</p>	<p>We Disagree with High VSL & Severe VSL. The word “familiar” is defined as “often encountered or seen” or “having fair knowledge of” or “acquainted with”. These are all subjective terms which leave much room for interpretation and therefore cannot be used to consistently and fairly assess violation severity levels. Unless specific measures are proposed, all VSLs associated with requirement R1 should be removed (that is, listed as N/A). This will be consistent with the “levels of non-compliance language” which was used in the version of the standard adopted by the Board of Trustees on November 1, 2007.</p>
<p>Response: Thank you for your comment. While we recognize that the word “familiar” is ambiguous, the requirement itself states that “Each Transmission Operator, Balancing Authority, and Generator Operator shall be familiar with the purpose and limitations of protection system schemes applied in its area.” FERC Guideline 3 requires that VSL assignments be consistent with the corresponding requirement, and it would be inappropriate for this team to attempt to clarify the requirement using VSL language.</p> <p>We cannot remove the VSLs all together because, per NERC's VSL Guidelines, each requirement must have an associated VSL assignment: “Every requirement must have a set of one to four VSLs to categorize noncompliance performance with the requirement...”</p> <p>PRC-001 is undergoing significant revision as part of Project 2007-06—System Protection Coordination: http://www.nerc.com/filez/standards/System_Protection_Project_2007-06.html. We encourage you to follow along with that project to ensure that your concerns are addressed.</p>		
<p>Georgia System Operations</p>	<p>No</p>	<p>This VSL uses the ambiguous term "familiar" and is not consistent with FERC guideline 2b above.</p>

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Organization	Yes or No	Question 10 Comment
Corporation		<p>The VSL may also have an adverse impact on entities of varying sizes because it is not based on each protection system (FERC Guideline 4).</p> <p>Additionally, this VSL places a lower importance on "limitations" by placing it in the High VSL and a greater importance on "purpose" by placing it in the Server VSL. Consider the following: Recommendation: High VSL: Should be failed to be familiar with either the "purpose" OR "limitation" of a protection system scheme... Severe VSL: Should be failed to be familiar with both the "purpose" AND "limitation" of a protection system scheme...</p>
<p>Response: Thank you for your comment. While we recognize that the word “familiar” is ambiguous, the requirement itself states that “Each Transmission Operator, Balancing Authority, and Generator Operator shall be familiar with the purpose and limitations of protection system schemes applied in its area.” FERC Guideline 3 requires that VSL assignments be consistent with the corresponding requirement, and it would be inappropriate for this team to attempt to clarify the requirement using VSL language.</p> <p>For these VSL assignments, the DT does not believe there is a way to clearly distinguish the impact of this requirement on entities of varying sizes.</p> <p>The DT believes that it is a more significant violation to fail to be familiar with the purpose of protection scheme systems applied in the area. Thus, it believes the High and Severe VSLs are appropriately assigned.</p> <p>PRC-001 is undergoing significant revision as part of Project 2007-06—System Protection Coordination: http://www.nerc.com/filez/standards/System_Protection_Project_2007-06.html. We encourage you to follow along with that project to ensure that your concerns are addressed.</p>		
Georgia Transmission Corporation	No	"be familiar with" is not definitive. To what degree is the knowledge?
<p>Response: Thank you for your comment. While we recognize that the word “familiar” is ambiguous, the requirement itself states that “Each Transmission Operator, Balancing Authority, and Generator Operator shall be familiar with the purpose and limitations of protection system schemes applied in its area.” FERC Guideline 3 requires that VSL assignments be consistent with the corresponding requirement, and it would be inappropriate for this team to attempt to clarify the requirement using VSL language.</p> <p>PRC-001 is undergoing significant revision as part of Project 2007-06—System Protection Coordination: http://www.nerc.com/filez/standards/System_Protection_Project_2007-06.html. We encourage you to follow along with that project to ensure that your concerns are addressed.</p>		
ERCOT	Yes	
American Electric Power	Yes	

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Organization	Yes or No	Question 10 Comment
Hydro-Quebec TransEnergie (NCR07112)	Yes	
Independent Electricity System Operator	Yes	
Northeast Power Coordinating Council	Yes	
GDS Associates, Inc	Yes	

11. Do you agree with the proposed VSL(s) modifications for PRC-001-1, R3.1? If not, please offer your suggested alternative language.

Summary Consideration: Two commenters suggested that the VSLs be rolled up into the VSL for the main requirement, but the DT pointed out that in the case of some older standards, in which the sub-requirements are written as though they are actual requirements, it is appropriate to write VSLs for the sub-requirement. In this case, the sub-requirements are directed at different entities and it makes more sense to have separate sets of VSLs. These commenters also suggested a language change that the DT did not agree with.

One commenter discussed the relationship between the VSLs and the reliability of the BPS. The DT reminded this commenter that VSLs define the degree to which compliance with a requirement was not achieved, not the impact that noncompliance would have on the reliability of the BES. It is the Violation Risk Factors that assess the impact to reliability of violating a specific requirement.

No changes were made.

Organization	Yes or No	Question 11 Comment
Northeast Power Coordinating Council	No	Consistent with NERC’s VSL Guidelines applied in the previous posting, the VSL of the sub-requirement should be incorporated into the VSL of the main requirement. We therefore suggest the stated VSLs be “OR ed” with the corresponding VLSs of Requirement R3.2 into a set of VSLs for the main requirement. Also, for consistency with the other VSLs, we suggest inserting “either” after “with” for the Severe VSL.
<p>Response: Thank you for your comment. In the case of some older standards, in which the sub-requirements are written as though they are actual requirements, it has been deemed appropriate to write VSLs for the sub-requirement. In this case, the sub-requirements are directed at different entities and it makes more sense to have separate sets of VSLs.</p> <p>“Either” is not an appropriate addition for the Severe VSL because there are more than two items involved: its Transmission Operator, its Host Balancing Authority, or both. “Either” is typically only used when referring to exactly two subjects.</p>		
Independent Electricity System Operator	No	Consistent with NERC’s VSL Guidelines applied in the previous posting, the VSL of the sub-requirement should be incorporated into the VSL of the main requirement. We therefore suggest the stated VSLs be “OR ed” with the corresponding VLSs of Requirement R3.2 into a set of VSLs for the main requirement. Also, for consistency with the other VSLs, we suggest inserting “either” after “with” for the Severe VSL.
<p>Response: Thank you for your comment. In the case of some older standards, in which the sub-requirements are written as though they are actual</p>		

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Organization	Yes or No	Question 11 Comment
<p>requirements, it has been deemed appropriate to write VSLs for the sub-requirement. In this case, the main “requirement” is meaningless without its sub-requirements, and the DT believes it makes more sense to leave the VSLs as they are.</p> <p>“Either” is not an appropriate addition for the Severe VSL because there are more than two items involved: its Transmission Operator, its Host Balancing Authority, or both. “Either” is typically only used when referring to exactly two subjects.</p>		
GDS Associates, Inc	No	<p>Assignment of a VSL based on the number of times you failed to perform coordination of a new or modified protection system is not sending the proper reliability signal. Missing one new or modified system could have a very negative impact to the reliability of the BPS; however, would only be a lower VSL and lower penalty range. The better solution would be to make a higher VSL for any instance of non performance of coordination. This matches the penalty to the potential risk to the reliability of the BPS.</p>
<p>Response: Thank you for your comment. The DT believes the VSLs are appropriately assigned. VSLs define the degree to which compliance with a requirement was not achieved, not the impact that noncompliance would have on the reliability of the BES. It is the Violation Risk Factors that assess the impact to reliability of violating a specific requirement. No change made.</p>		
Bonneville Power Administration	Yes	
Midwest ISO Standards Collaborators	Yes	
IRC Standards Review Committee	Yes	
MRO's NERC Standards Review Subcommittee	Yes	
Manitoba Hydro	Yes	
Georgia Transmission Corporation	Yes	
American Electric Power	Yes	
Kansas City Power & Light	Yes	

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Organization	Yes or No	Question 11 Comment
Hydro-Quebec TransEnergie (NCR07112)	Yes	
Georgia System Operations Corporation		
ERCOT		

12. Do you agree with the proposed VSL(s) modifications for PRC-001-1, R3.2? If not, please offer your suggested alternative language.

Summary Consideration: Two commenters suggested that the VSLs be rolled up into the VSL for the main requirement, but the DT pointed out that in the case of some older standards, in which the sub-requirements are written as though they are actual requirements, it is appropriate to write VSLs for the sub-requirement. In this case, the sub-requirements are directed at different entities and it makes more sense to have separate sets of VSLs.

One commenter discussed the relationship between the VSLs and the reliability of the BPS. The DT reminded this commenter that VSLs define the degree to which compliance with a requirement was not achieved, not the impact that noncompliance would have on the reliability of the BES. It is the Violation Risk Factors that assess the impact to reliability of violating a specific requirement.

No changes were made.

Organization	Yes or No	Question 12 Comment
Northeast Power Coordinating Council	No	Consistent with NERC’s VSL Guidelines applied in the previous posting, the VSL of the sub-requirement should be incorporated into the VSL of the main requirement. We therefore suggest the stated VSLs be “OR-ed” with the corresponding VLSs of the main requirement.
<p>Response: Thank you for your comment. In the case of some older standards, in which the sub-requirements are written as though they are actual requirements, it has been deemed appropriate to write VSLs for the sub-requirement. In this case, the sub-requirements are directed at different entities and it makes more sense to have separate sets of VSLs.</p>		
Independent Electricity System Operator	No	Consistent with NERC’s VSL Guidelines applied in the previous posting, the VSL of the sub-requirement should be incorporated into the VSL of the main requirement. We therefore suggest the stated VSLs be “OR ed” with the corresponding VLSs of the main requirement.
<p>Response: Thank you for your comment. In the case of some older standards, in which the sub-requirements are written as though they are actual requirements, it has been deemed appropriate to write VSLs for the sub-requirement. In this case, the main “requirement” is meaningless without its sub-requirements, and the DT believes it makes more sense to leave the VSLs as they are.</p>		
GDS Associates, Inc	No	Assignment of a VSL based on the number of times you failed to perform coordination of a new or modified protection system is not sending the proper reliability signal. Missing one new or modified system could have a very negative impact to the reliability of the BPS; however, would only be a lower VSL and lower penalty

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Organization	Yes or No	Question 12 Comment
		range. The better solution would be to make a higher VSL for any instance of non performance of coordination. This matches the penalty to the potential risk to the reliability of the BPS.
<p>Response: Thank you for your comment. The DT believes the VSLs are appropriately assigned. VSLs define the degree to which compliance with a requirement was not achieved, not the impact that noncompliance would have on the reliability of the BES. It is the Violation Risk Factors that assess the impact to reliability of violating a specific requirement. No change made.</p>		
Hydro-Quebec TransEnergie (NCR07112)	Yes	Need clarification on the number (quantity) of protective specified the severity.
<p>Response: Thank you for your comment. The DT believes the VSLs are clear as written. No change made.</p>		
Midwest ISO Standards Collaborators	Yes	
IRC Standards Review Committee	Yes	
MRO's NERC Standards Review Subcommittee	Yes	
Bonneville Power Administration	Yes	
Manitoba Hydro	Yes	
Georgia Transmission Corporation	Yes	
American Electric Power	Yes	
ERCOT	Yes	
Kansas City Power & Light	Yes	
Georgia System Operations		

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Organization	Yes or No	Question 12 Comment
Corporation		

13. Do you agree with the proposed VSL(s) modifications for PRC-005-1, R1? If not, please offer your suggested alternative language.

Summary Consideration: Commenters caught a typo in the High VSL. In the phrase "...but the maintenance and testing intervals and their basis was missing or incomplete," "was" has been changed to "were."

Organization	Yes or No	Question 13 Comment
Northeast Power Coordinating Council	No	For the High VSL, replace "was" with "were".
Response: Thank you for your comment. That change has been made.		
Midwest ISO Standards Collaborators	No	For the High VSL, replace "was" with "were".
Response: Thank you for your comment. That change has been made.		
IRC Standards Review Committee	No	For the High VSL, replace "was" with "were".
Response: Thank you for your comment. That change has been made.		
MRO's NERC Standards Review Subcommittee	No	For the High VSL, replace "was" with "were".
Response: Thank you for your comment. That change has been made.		
Independent Electricity System Operator	No	For the High VSL, replace "was" with "were".
Response: Thank you for your comment. That change has been made.		
Kansas City Power & Light	No	For the High VSL, replace "was" with "were".

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Organization	Yes or No	Question 13 Comment
Response: Thank you for your comment. That change has been made.		
Manitoba Hydro	Yes	
Bonneville Power Administration	Yes	
Georgia Transmission Corporation	Yes	
American Electric Power	Yes	
Hydro-Quebec TransEnergie (NCR07112)	Yes	
ERCOT	Yes	
GDS Associates, Inc	Yes	
Georgia System Operations Corporation		

14. Do you agree with the proposed VSL(s) modifications for PRC-010-0, R1? If not, please offer your suggested alternative language.

Summary Consideration: No comments were made, and all stakeholders indicated their support for the VSLs as written. Accordingly, no changes were made.

Organization	Yes or No	Question 14 Comment
Northeast Power Coordinating Council	Yes	
Bonneville Power Administration	Yes	
Midwest ISO Standards Collaborators	Yes	
IRC Standards Review Committee	Yes	
MRO's NERC Standards Review Subcommittee	Yes	
Georgia Transmission Corporation	Yes	
American Electric Power	Yes	
Hydro-Quebec TransEnergie (NCR07112)	Yes	
ERCOT	Yes	
Independent Electricity System Operator	Yes	

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Organization	Yes or No	Question 14 Comment
Kansas City Power & Light	Yes	
GDS Associates, Inc	Yes	
Manitoba Hydro		N/A
Georgia System Operations Corporation		

END OF REPORT