NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Consideration of Comments for Draft 2 of the Violation Severity Levels for the Emergency Operations Standards

The EOP Violations Severity Levels Drafting Team (EOP VSL DT) thanks all commenters who submitted comments on the second draft of the EOP Violation Severity Levels (VSLs). These documents were posted for a 30-day public comment period from April 9, 2009 through May 8, 2009. The stakeholders were asked to provide feedback on the documents through a special Electronic Comment Form. There were 13 sets of comments, including comments from more than 75 different people from over 45 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

While the EOP VSL DT was able to use many of the industry's suggestions and made modifications to add greater clarity and consistency to the VSLs, there were some comments that the DT was not able to use, including the following:

- Some commenters suggested the use of the quartile approach which is not always appropriate and has been discouraged by FERC. The quartile approach categorized noncompliant performance in increments of 25%, and FERC has indicated that increments of 5% better match NERC's definitions for Lower, Moderate, High and Severe VSLs. The DT retained percentages that differ from the 5, 10, 15% thresholds for a few requirements where a greater percentage of noncompliant performance would meet NERC's definitions for Lower, Moderate, and High VSLs.
- Some commenters expressed a concern regarding assigning a Severe VSL to a "binary" requirement, (either a yes or no on meeting the requirement), when partial compliance is not acceptable. VSLs categorize how completely the requirement has been met, not risk or impact to the electric system. Therefore a requirement or sub-requirement judged to be "binary" that has not been met must be assigned a Severe VSL.
- Several suggestions were made that would require interpretation of and/or expansion on the language of the requirements and this is beyond the scope of the DT.
- Some suggestions proposed VSLs that differed from those included in specific FERC directives, and these were not adopted.

In this "Consideration of Comments" document stakeholder comments have been arranged so that it is easier to see the responses associated with each question. All comments received on the standard can be viewed in their original format at:

http://www.nerc.com/filez/standards/EOP_VSLs_Project_2008-08.html

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, Gerry Adamski, at 609-452-8060 or at gerry.adamski@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.

Index to Questions, Comments, and Responses

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

		Commenter	Organization	Industry Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Ben Li	IRC Standards Review Committee		X								

	Additional Member	Additional Organization	Region	Segment Selection
1.	Patrick Brown	PJM	RFC	**2**
2.	Bill Phillips	MISO	MRO	**2**
3.	Lourdes Estrada-Salinero	CAISO	WECC	**2**
4.	Steve Myers	ERCOT	ERCOT	**2**
5.	James Castle	NYISO	NPCC	**2**
6.	Charles Yeung	SPP	SPP	**2**
7.	Matt Goldberg	ISO-NE	NPCC	**2**

2.	Individual	Dan Rochester	Independent Electricity System Operator		X								
3.	Group	Denise Koehn	Bonneville Power Administration	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Robin Chung	Generation Support	WECC	**3,5 6**
2.	James Burns	Transmission Technical	WECC	**1**

		Commenter	Organization	Industry Segment									
				1	2	3	4	5	6	7	8	9	10
	Operations												
4.	Individual	Ed Davis	Entergy Services	X		X		X	X				
5.	Group	Guy Zito	Northeast Power Coordinating Council										X

	Additional Member	Additional Organization	Region	Segment Selection
1.	Ralph Rufrano	New York Power Authority	NPCC	**5**
2.	Al Adamson	New York State Reliability Council	NPCC	**10**
3.	Greg Campoli	New York Independent System Operator	NPCC	**2**
4.	Roger Champagne	Hydro-Quebec TransEnergie	NPCC	**2**
5.	Kurtis Chong	Independent Electricity System Operator	NPCC	**2**
6.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	**1**
7.	Manuel Couto	National Grid	NPCC	**1**
8.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	**1**
9.	Brian Evans-Mongeon	Utility Services	NPCC	**8**
10.	Mike Garton	Dominion Resources Services, Inc.	NPCC	**5**
11.	Michael Gildea	Constellation Energy	NPCC	**6**
12.	Brian Gooder	Ontario Power Generation Incorporated	NPCC	**5**
13.	Kathleen Goodman	ISO - New England	NPCC	**2**
14.	David Kiguel	Hydro One Networks Inc.	NPCC	**1**
15.	Michael Lombardi	Northeast Utilities	NPCC	**1**
16.	Randy MacDonald	New Brunswick System Operator	NPCC	**2**
17.	Bruce Metruck	New York Power Authority	NPCC	**6**
18.	Robert Pellegrini	The United Illuminating Company	NPCC	**1**
19.	Michael Schiavone	National Grid	NPCC	**1**
20.	Michael Sonnelitter	FPL/NextEra Energy	NPCC	**5**
21.	Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	**3**
22.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	**10**
23.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC	**10**

		Commenter	Organization	Industry Segment									
				1	2	3	4	5	6	7	8	9	10
6.	Group	Jalal Babik	Dominion Resources Inc.	X		X		X	X				

	Additional Member	Additional Organization	Region	Segment Selection
1.	Louis Slade	Electric Market Policy	RFC, SERC	**6**
2.	Mike Garton	Electric Market Policy	NPCC, MRO	**5**

		Commenter	Organization	Industry Segment									
				1	2	3	4	5	6	7	8	9	10
7.	Group	Jim Busbin	Southern Company - Transmission	X									

	Additional Member	Additional Organization	Region	Segment Selection
1.	Raymond Vice	Southern Company Services	SERC	**1**
2.	Terry Coggins	Southern Company Services	SERC	**1**
3.	J. T. Wood	Southern Company Services	SERC	**1**
4.	Marc Butts	Southern Company Services	SERC	**1**
5.	Hugh Francis	Southern Company Services	SERC	**1**

8.	Individual	James H. Sorrels, Jr.	American Electric Power	X		X		X	X				
9.	Group	Jim Case	SERC OC Standards Review Group	X		X		X					

	Additional Member	Additional Organization	Region	Segment Selection
1.	Gerald Beckerle	Ameren	SERC	**1,3,5**
2.	John Rembold	SIPC	SERC	**1,3,5**
3.	Travis Sykes	TVA	SERC	**1,3,5,9**
4.	Alan Jones	Alcoa	SERC	**1,3,5**
5.	Eugene Warnecke	Ameren	SERC	**1,3,5**
6.	Paul Turner	GASOC	SERC	**3**
7.	Tom Sims	Southern	SERC	**1,3,5**
8.	Brad Young	E.ON US	SERC	**1,3,5**
9.	Gary Hutson	SMEPA	SERC	**1,3,5**
10.	Steve Fritz	ACES Power	SERC	**6**
11.	David McRee	Duke	SERC	**1,3,5**
12.	Marc Butts	Southern	SERC	**1,3,5**

	Commenter	Organization	Industry Segment									
			1	2	3	4	5	6	7	8	9	10
	13. Tim Hattaway — PowerSouth — SERC — **1,5**											
	14. J.T. Wood — Southern — SERC — **1,3,5**											
	15. Vicky Budreau — Santee Cooper — SERC — **1,3,9**											
	16. Robert Thomasson — BREC — SERC — **1,3,5**											
10.	Individual	Luke Weber	We Energies			X	X	X					
11.	Group	Michael Brytowski	MRO NERC Standards Review Subcommittee										X
	Additional Member — **Additional Organization** — **Region** — **Segment Selection**											
	1. Carol Gerou — MP — MRO — **1,3,5,6**											
	2. Neal Balu — WPS — MRO — **3,4,5,6**											
	3. Terry Bilke — MISO — MRO — **2**											
	4. Joe Depoorter — MGE — MRO — **3,4,5,6**											
	5. Ken Goldsmith — ALTW — MRO — **4**											
	6. Jim Haigh — WAPA — MRO — **1,6**											
	7. Terry Harbour — MEC — MRO — **1,3,5,6**											
	8. Joseph Knight — GRE — MRO — **1,3,5,6**											
	9. Scott Nickels — RPU — MRO — **3,4,5,6**											
	10. Dave Rudolph — BEPC — MRO — **1,3,5,6**											
	11. Eric Ruskamp — LES — MRO — **1,3,5,6**											
	12. Pam Sordet — XCEL — MRO — **1,3,5,6**											
12.	Individual	Wayne Pourciau	Georgia System Operations Corp.			X	X						
13.	Individual	Sandra Shaffer	PacifiCorp	X		X		X	X				

1. Please review the proposed VLS for EOP-001-0 Emergency Operations Planning. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Summary Consideration: In response to comments received, the DT revised the wording of some VSLs, including those identified below.

VSLs for R1 – made a clarifying edit to the Moderate VSL, changing, "agreement" to "agreement(s) to recognize that the Balancing Authority may have more than one agreement and added some words to the Severe VSL for improved clarity.

VSLs for R3 – removed VSLs from the primary requirement as it does not contain any required performance.

VSLs for R6 – made a clarifying edit to the Severe VSL, changing, "as appropriate" to "appropriately"

VSLs for R7 – made a set of clarifying edits by changing, "appropriate" to "applicable in all four VSLs

The industry had concerns regarding potential double jeopardy, and the DT supports the "roll-up" approach to assigning sub-requirements to the VSLs of the "parent" requirement as a means to avoid double jeopardy. Some comments suggested the use of the quartile approach which is not always appropriate and has been discouraged by FERC. The quartile approach categorized noncompliant performance in increments of 25%, and FERC has indicated that increments of 5% better match NERC's definitions for Lower, Moderate, High and Severe VSLs.

The industry expressed a concern regarding assigning a Severe VSL to a "binary" requirement, (either a yes or no on meeting the requirement or subrequirement), when partial compliance is not acceptable. VSLs measure how completely the requirement has been met, not risk or impact to the electric system. Therefore a requirement or sub-requirement judged to be "binary" that has not been met must be assigned a Severe VSL.

Standard Number EOP-001-0 Emergency Operations Planning					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
Entergy Services	R1		The Balancing Authority demonstrated the existence of an operating agreement(s) with at least one adjacent Balancing		The Balancing Authority did not demonstrate the existence of any operating agreements that include provisions for emergency

Standard Number EOP-001-0 Emergency Operations Planning					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
			Authority . . .		assistance with adjacent Balancing Authorities.
Response: The EOP VSL DT agrees with your suggestions and has made some changes to the VSL language.					
Southern Company	R1	**Additional Comments:** R1/Moderate VSL -- It is our opinion that the present proposed language for the Moderate VSL should set a "two agreement" minimum for adjacent Balancing Authority operating agreements instead of "one agreement." The reasoning is that if the adjacent Balancing Authority in the agreement cannot supply emergency assistance to the requesting Balancing Authority, it is possible that the remote Balancing Authority in that same agreement may be supplying (or will be supplying) assistance to the adjacent Balancing Authority. We recommend that the VSL utilize the "... at least two adjacent ..." language to establish at least two unique paths for supplying emergency assistance to any Balancing Authority requesting assistance. A caveat is introduced for those Balancing Authorities that are radially connected to another Balancing Authority.			
			The Balancing Authority demonstrated the existence of an operating agreement with at least two adjacent Balancing Authorities, one adjacent Balancing Authority if only one exists, for emergency assistance, but the agreement did not include provision for obtaining emergency assistance from any remote Balancing Authority.		
Response: The EOP VSLDT does not accept your suggested changes. The proposed language would change the wording of the requirement and this is beyond the scope of this DT.					
Georgia Power	R2	The Transmission Operator's emergency load reduction plan that is capable of being implemented within 30 minutes failed to include less than 25% of its identified IROLs	The Transmission Operator's emergency load reduction plan that is capable of being implemented within 30 minutes failed to include 25% or more but less than 50% of its identified IROLs	The Transmission Operator's emergency load reduction plan that is capable of being implemented within 30 minutes failed to include 50% or more but less than 75% of its identified IROLs	The Transmission Operator failed to demonstrate the existence of an emergency load reduction plan that is capable of being implemented within 30 minutes for all identified IROLs.

Standard Number EOP-001-0 Emergency Operations Planning					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
Response: The EOP VSL DT does not accept your suggested changes. VSLs based on the use of % are most appropriate when there is a very large number of items – and since most entities will have very few IROLs, using % is not appropriate.					
Southern Company	R3	R3/All VSLs -- The VSL's for Requirement 3 should either be deleted or the VSLs for the sub-requirements should be rolled up into a set of VSLs for Requirement 3 and the VSLs for the sub-requirements deleted. As this double jeopardy situation exists, any violation of one or more of the sub-requirements also results in a violation of Requirement 3.			
Response: The EOP VSL DT agrees with your comment regarding rolling up the VSLs in the sub-requirements due to the potential double jeopardy issue (also raised by others. The VSL for the primary requirement were removed.					
IESO	R3	Having VSLs assigned to both the main requirement and its subrequirements will subject an entity to double jeopardy. Propose to either assign VSLs to R3 based on violation of its subrequirement as proposed in the VSL set and remove the VSLs for the 4 sub-requirements (i.e., roll-up), or remove the VSLs for R3.	Ditto	Ditto	Ditto
Response: The EOP VSL DT agrees with your comment regarding the potential double jeopardy issue (also raised by others). The VSLs for the primary requirement were removed.					
Georgia System Ops	R3	N/A	N/A	N/A	N/A
	R3.1	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity and the plans are maintained but the plans are not implemented.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity but the plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity.

Standard Number EOP-001-0 Emergency Operations Planning					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
	R3.2	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies on the transmission system and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies on the transmission system and the plans are maintained but the plans are not implemented.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies on the transmission system but the plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans to mitigate operating emergencies on the transmission system.
	R3.3	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for load shedding and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for load shedding and the plans are maintained but the plans are not implemented.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for load shedding but the plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans for load shedding.
	R3.4	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for system restoration and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for system restoration and the plans are maintained but the plans are not implemented.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for system restoration but the plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans for system restoration.
Response: The EOP VSL DT agrees with your comment regarding the potential double jeopardy issue (also raised by others). The VSLs for the primary requirement were removed, however there were no changes adopted for the VSLs assigned to the subrequirements.					
Dominion	R3.1 – 3.4	Should be rolled into R3	Should be rolled into R3	Should be rolled into R3	Should be rolled into R3
Response: The EOP VSL DT agrees with your comment regarding the potential double jeopardy issue (also raised by others). The VSLs for the primary requirement were removed.					
SERC OC SRC	R3.4	*Comment: Plans can only be implemented if there is an emergency*			
			The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set

Standard Number EOP-001-0 Emergency Operations Planning					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
			system restoration and the plans are implemented during an emergency, but the plans are not maintained.	system restoration but the plans are neither maintained nor implemented during an emergency.	of plans for system restoration.
Response: The EOP VSL DT does not accept your suggested changes; the current language of the VSLs reflects the language of the sub-requirement.					
IESO	R4	OK	OK	OK	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans are missing two (2) or more of the sub-requirements identified for R4.
Response: The EOP VSL DT sees no difference in your proposed language and that posted.					
Dominion	R4	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans do not include one of the sub-requirements.	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans do not include two of the sub-requirements.	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans do not include three of the sub-requirements.	The Transmission Operator or Balancing Authority did not demonstrate the existence of emergency plans that will enable it to mitigate operating emergencies.
Response: The EOP VSL DT did not make any changes to the language of these VSLs based on your comments, since the sub-requirements are not of equal weight.					
Georgia System Ops	R4	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans do not include 1 or more sub-requirement.	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans do not include 3 or more sub-requirement.	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans do not include any sub-requirement.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of emergency plans that will enable it to mitigate operating emergencies.

Standard Number EOP-001-0 Emergency Operations Planning					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
	R4.1	N/A	N/A	N/A	N/A
	R4.2	N/A	N/A	N/A	N/A
	R4.3	N/A	N/A	N/A	N/A
	R4.4	N/A	N/A	N/A	N/A
Response: EOP VSL DT does not accept your suggested changes to R 4. The VSLs for the sub-requirements have been rolled up as you suggest, however the sub-requirements are not of equal weight and this is reflected in the current language of the revised VSLs.					
PacifiCorp	R4	For a number of the requirements (R4, R6, R7), PacifiCorp notes that the general trend is to increase the level of severity, and in a number of cases the eliminate a "Lower" VSL. PacifiCorp reiterates its position that some of the requirements remain ambiguous and that simply increasing the severity levels for unclear requirements will not improve reliability to the BES. If Responsible Entities do not know what constitues compliance in the first place, more severe penalties do not provide any added incentive to be compliant.			
Response: VSLs for the subrequirements were "rolled up" into the associated Requirement. The purpose of "rolling up" subrequirements into the Requirement is to assess performance with a requirement in its entirety, which eliminates the possibility of double jeopardy – the purpose of rolling up VSLs is not to increase the severity level for the subrequirement.					
Southern Company	R4	R4/Standard -- While not within the scope of this comment posting, we find the phrasing "Staffing levels" of R4.4 to be ambiguous and unclear.			
Response: Changing words in the requirements is beyond the scope of this drafting team.					
IESO	R5	The Transmission Operator or Balancing Authority included less than 100% but more than 90% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority included less than or equal to 90% but more then 70% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority included less than or equal to 70% but more then 50% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority included less than or equal to 50% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.
Response: The EOP VSL DT sees no difference in your proposed language and that posted.					

Standard Number EOP-001-0 Emergency Operations Planning					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
Georgia System Ops	R5	The Transmission Operator or Balancing Authority failed to include less than 25% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority failed to include 25% or more but less than 50% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority failed to include 50% or more but less than 75% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority failed to include 75%or more of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.
Response: The EOP VSL DT does not accept your suggested change. The use of 25% increments is not appropriate. Failing to include 50% or more of the applicable elements does not meet the intent of R5.					
Entergy	R6				The Transmission Operator or Balancing Authority failed to provide evidence that it completed an annual review and updated each of its emergency plans appropriately. OR No changes.
Response: The EOP VSL DT agrees with your suggestions and has made changes to the VSL language.					
Georgia System Ops	R6	The Transmission Operator or Balancing Authority failed to annually review and update less than 25% of its emergency plans and failed to provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.	The Transmission Operator or Balancing Authority failed to annually review and update 25% or more but less than 50% of its emergency plans and failed to provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.	The Transmission Operator or Balancing Authority failed to annually review and update 50% or more but less than 75% of its emergency plans and failed to provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.	The Transmission Operator or Balancing Authority failed to annually review and update 75% or more of its emergency plans and failed to provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.
Response: The EOP VSL DT does not accept your suggested changes, the current VSLs reflect the language of the requirement and the DT believes the					

Standard Number EOP-001-0 Emergency Operations Planning					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
quartile approach is not appropriate for this Requirement.					
BPA	R6				Severe VSL seems extreme for not conducting an annual review of an existing plan.
Response: The EOP VSL DT determined this requirement to be binary in nature and if the requirement is not met it totally misses the intent and is therefore a Severe Level, as suggested by FERC and as defined by NERC's definitions for VSLs.					
PacifiCorp	R6	For a number of the requirements (R4, R6, R7), PacifiCorp notes that the general trend is to increase the level of severity, and in a number of cases the eliminate a "Lower" VSL. PacifiCorp reiterates its position that some of the requirements remain ambiguous and that simply increasing the severity levels for unclear requirements will not improve reliability to the BES. If Responsible Entities do not know what constitues compliance in the first place, more severe penalties do not provide any added incentive to be compliant.			
Response: In R6, only the language used in the VSL was revised – no changes or elimination of any VSLs.					
Entergy	R7	The Transmission Operator or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in R7.4 was not included.	The Transmission Operator or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in R7.3 was not included.	The Transmission Operator or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in either R7.1 or R7.2 was not included.	The Transmission Operator or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in tow (2) or more of the sub-requirements was not included.
Response: The EOP VSL DT has made changes to the VSL language based on other comments received and replaced the word, "appropriate" with the word, "applicable" in all four of the VSLs. The requirement uses the word, "applicable" when referencing the subrequirements, so this revision makes the VSLs align more closely with the language in the requirement.					
Georgia System Ops	R7	The Transmission Operator or Balancing Authority coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but did not execute up to 2 of the applicable steps.	The Transmission Operator or Balancing Authority coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but did not execute 3 of the applicable steps.	The Transmission Operator or Balancing Authority coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but did not execute the any of the applicable steps.	The Transmission Operator or Balancing Authority failed to coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate and to execute any of the applicable steps.

Standard Number EOP-001-0 Emergency Operations Planning					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
Response: The EOP VSL DT does not accept your suggested changes. The revised VSLs are very specific as to which sub-requirements are assigned to each severity level and the sub-requirements are not of equal weight.					
BPA	R7	Remove the lower VSL (bad wording) Everything is appropriate why would there be a violation?			
Response: The EOP VSL DT replaced the word, "appropriate" with the word, "applicable" in all four of the VSLs. The requirement uses the word, "applicable" when referencing the subrequirements, so this revision makes the VSLs align more closely with the language in the requirement.					
PacifiCorp	R7	For a number of the requirements (R4, R6, R7), PacifiCorp notes that the general trend is to increase the level of severity, and in a number of cases the eliminate a "Lower" VSL. PacifiCorp reiterates its position that some of the requirements remain ambiguous and that simply increasing the severity levels for unclear requirements will not improve reliability to the BES. If Responsible Entities do not know what constitues compliance in the first place, more severe penalties do not provide any added incentive to be compliant.			
Response: VSLs for the subrequirements were "rolled up" into the VSLs for the associated Requirement. The purpose of "rolling up" subrequirements into the Requirement is to assess performance with a requirement in its entirety, which eliminates the possibility of double jeopardy – the purpose of rolling up VSLs is not to increase the severity level for the subrequirement.					
Southern Company	R7.2	R7.2/Standard – Again not within the scope of this comment posting but we find the phrasing, "... arrange *new interchange agreements* ..." (our emphasis), to be non-conforming with the Functional Model and overly prescriptive. The words "new interchange" should be deleted from the sub-requirement – at some point.			
Response: As you suggest, changing words in the requirements is beyond the scope of this drafting team.					

2. Please review the proposed VLS for EOP-002-2 Capacity and Energy Emergencies. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Summary Consideration: In response to industry comments, changes were made to the VSLs for R1, R6 and R8 to improve the VSLs and remove ambiguous language as follows:

R1 – moved one of the Severe VSLs to High for consistency between standards.

R6 VSLs – made some typographical corrections and added another Severe VSL to align more closely with the language in the requirement

R7 VSLs – made some typographical corrections to the High and Severe VSLs

R8 VSLS – moved the High to Moderate, moved the Severe to High, and added a new Severe – to more fully identify varying degrees of noncompliant performance.

R9.1 VSLs – made some typographical corrections in the Severe VSL

The industry members made some suggestions that would have required the use of language not in the standard and/or interpretation of the standard which is beyond the scoped of this DT. The industry expressed concerns regarding the "binary" requirements and the severe VSL issue.

Standard Number EOP-002-2 Capacity and Energy Emergencies					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
BPA	R1				OK for the 2nd OR function being severe but the lack of evidence of authority should be in a lower threshold.
Response: The EOP VSL DT moved the first "OR" function to High based on your comment and consistency with the VSLs in a similar requirement in another standard.					
Georgia System	R3	N/A	N/A	The Balancing Authority experienced an operating capacity or energy emergency but failed to	The Balancing Authority experienced an operating capacity or energy emergency and failed to

Standard Number EOP-002-2 Capacity and Energy Emergencies					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
Ops				communicate its current and future system conditions to either its Reliability Coordinator or its neighboring Balancing Authorities.	communicate its current and future system conditions to its Reliability Coordinator and its neighboring Balancing Authorities.
Response: The EOP VSL DT does not accept the suggested language. The DT believes that missing either part of the requirement means that the reliability-related intent of the requirement has been so badly missed that it meets the criteria for a "Severe" VSL.					
IRC **IESO**	R3	The suggested changes reflect total failure of the requirement if the responsible entity fails to fulfill both parts – communicating to the BAs AND to the RCs.			
				The Balancing Authority experienced an operating capacity or energy emergency and failed to communicate its current and future system conditions to its neighboring Balancing Authorities or its Reliability Coordinator.	The Balancing Authority experienced an operating capacity or energy emergency and failed to communicate its current and future system conditions to its neighboring Balancing Authorities and its Reliability Coordinator.
Response: The EOP VSL DT does not accept your suggested changes; failing to communicate to either of the named entities is a severe violation of the requirement.					
Georgia System Ops	R4.	N/A	The Balancing Authority anticipating an operating capacity or energy emergency to perform actions necessary but did not include less than half of the steps in R4	The Balancing Authority anticipating an operating capacity or energy emergency to perform actions necessary but did not include half or more of the steps in R4	The Balancing Authority anticipating an operating capacity or energy emergency failed to perform all actions necessary
Response: The EOP VSL DT does not accept the suggested language. The reliability-related intent of the requirement is missed if any of the steps are missed, therefore missing any of the steps is a Severe VSL.					
Georgia System Ops	R5.	N/A	N/A	The Balancing Authority used the assistance provided by the Interconnection's frequency bias for more time than needed to implement corrective actions.	The Balancing Authority used the assistance provided by the Interconnection's frequency bias for more time than needed to implement corrective actions.

Standard Number EOP-002-2 Capacity and Energy Emergencies					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
				OR The Balancing Authority unilaterally adjusted generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.	AND The Balancing Authority unilaterally adjusted generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.
Response: The suggested alternative language appears identical to the revised VSLs.					
SERC OS SRC	R5	This is a compound requirement. Our suggestion recognizes the relative failure to comply with the two portions of the standard			
			The Balancing Authority used the assistance provided by the Interconnection's frequency bias for more time than needed to implement corrective actions.	The Balancing Authority unilaterally adjusted generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.	The Balancing Authority used the assistance provided by the Interconnection's frequency bias for more time than needed to implement corrective actions. AND The Balancing Authority unilaterally adjusted generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.
Response: The EOP VSL DT does not accept the suggested changes. Failure to meet either of the components of R5 results in a High VSL, failing to meet both results in a Severe VSL. The suggested change differentiates the impact of the 2 components on compliance with R5 which is not supported by the language of the requirement.					

Standard Number EOP-002-2 Capacity and Energy Emergencies					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
Entergy Services	R6			Insert a comma after R6.1.	Insert a comma after R6.1.
Response: The EOP VSL DT accepts your suggested editorial changes.					
Georgia System Ops	R6.	N/A	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to immediately implement less than half of the sub-requirements R6.1 R6.2, R6.3, R6.4, R6.5 or R6.6. .	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to immediately implement half or more of the sub-requirements R6.1 R6.2, R6.3, R6.4, R6.5 or R6.6. .	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to immediately implement all of sub-requirements R6.1 R6.2, R6.3, R6.4, R6.5 or R6.6.
Response: The EOP VSL DT does not accept the suggested language. The DT did not feel the suggested VL gradients were consistent with meeting the reliability-related intent of R6.					
Southern Co Trans	R6	R6/All VSL's – Requirement 6 of the standard states, "... These remedies include, but are not limited to:" (our emphasis) which allows for additional remedies not listed. The VSLs, as written, invoke bounds not contained in the standard by placing a Balancing Authority in violation of the standard should it not inclusively invoke one of the six sub-requirements.			
Response: The EOP VSL DT accepted your suggestion and made some changes to the VSL language.					
AEP	R6	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to implement sufficient mitigating measures to correct the issue as defined in R6, once in a 3 year period.	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to implement sufficient mitigating measures to correct the issue as defined in R6, twice in a 3 year period.	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to implement sufficient mitigating measures as defined in R6 three times, in a 3 year period.	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to immediately implement sufficient mitigating measures to correct the issue as defined in R6 four times, in a 3 year period, **OR**, The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to immediately implement sufficient

Standard Number EOP-002-2 Capacity and Energy Emergencies					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
					mitigating measures as defined in R6 and caused external Balancing Authorities to intervene in an attempt to control interconnection collapse.
Response: The EOP VSL DT does not accept your proposed changes to the VSLs. The language used in R6 does not include a time constraint and the VSL must reflect the language of the Requirement. Adding a time constraint would be a revision of R6 which is outside the scope of this DT.					
PacifiCorp	R6	For a number of the requirements (R4, R6, R7), PacifiCorp notes that the general trend is to increase the level of severity, and in a number of cases the eliminate a "Lower" VSL. PacifiCorp reiterates its position that some of the requirements remain ambiguous and that simply increasing the severity levels for unclear requirements will not improve reliability to the BES. If Responsible Entities do not know what constitues compliance in the first place, more severe penalties do not provide any added incentive to be compliant.			
Response: In R6, VSLs for the subrequirements were "rolled up" into the associated Requirement's VSLs. The purpose of "rolling up" subrequirements into the Requirement is to eliminate the possibility of double jeopardy, not to increase the severity level for the subrequirement. **A Violation Severity Level (VSL) is defined as an after the fact look at how well the intent of the requirement was met (or how severely violated) it does not depend on BES impact, which is covered by Violation Risk Factor (VRF). Totally missing the intent of the requirement must be a severe level of VSL.**					
Southern Co Trans	R7	R7/Standard and VSLs -- Again, we understand the standard is not the subject of this posting but we find Requirements 6 and 7 very mis-directed and that it needlessly sets up multiple double jeopardy situations. BAL-001 and BAL-002 address Control Performance and Disturbance Control, respectively, and should be deleted from this standard. CPS and DCS requirements in this standard and in BAL-001 and BAL-002 create a double jeopardy situation. One of the other double jeopardy situations created is in the use of the same requirement multiple times within the same standard; for example, the use of shedding firm load in R6.6 and also in R7.1. The VSL Drafting Team can minimize these double jeopardy scenarios by identifying areas where double jeopardy is in play and set the VSL to "N/A" for the requirement which creates the double jeopardy condition.			
Response: The EOP VSL DT was assigned to draft VSLs for all requirements and subrequirements which were assigned a VRF. Double jeopardy has been reduced by the "rolling up" of subrequirements into the VSLs for the associated Requirement. Identification of potential double jeopardy situations between various Requirements or between standards or changing the language of the Reliability Standards is beyond the scope of this DT but is being pursued by other NERC efforts.					
Entergy Services	R7			Remove comma before both "or"'s and the extra space after the first "or".	Remove commas before both "or"'s.
Response: The EOP VSL DT accepts your suggested editorial changes.					

Standard Number EOP-002-2 Capacity and Energy Emergencies					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
WE Energies	R7				The Balancing Authority exhausted the steps listed in R6, or the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirements R7.1. requirements R7.1. AND ~~The Balancing Authority exhausted the steps listed in R6, or the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirement~~ R7.2.
Response: The EOP VSL DT has not made any changes based on your comments. The DT is using the words in the requirements for clarification and specificity.					
Georgia System Ops	R8.	N/A	A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert **Level 1** as detailed in Attachment 1-EOP-002-0 "Energy Emergency Alert Levels."	A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert **Level 2 or 3** as detailed in Attachment 1-EOP-002-0 "Energy Emergency Alert Levels."	A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate any Energy Emergency Alert as detailed in Attachment 1-EOP-002-0 "Energy Emergency Alert Levels." OR A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area

Standard Number EOP-002-2 Capacity and Energy Emergencies					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
					experiencing an actual Energy Emergency and the Reliability Coordinator did not act to mitigate the emergency condition by requesting emergency assistance when this was required.
Response: The EOP VSL DT has made changes to the language of these VSLs based on other industry comments.					
SERC OC SRC	R8		A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert **Level 1** as detailed in Attachment 1-EOP-002-0 "Energy Emergency Alert Levels."	A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert **Level 2 or 3** as detailed in Attachment 1-EOP-002-0 "Energy Emergency Alert Levels."	A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing an actual Energy Emergency and the Reliability Coordinator did not act to mitigate the emergency condition by requesting emergency assistance when this was required.
Response: The EOP VSL DT accepts the suggested changes.					
Entergy Services	R8				No change suggested. OR . . . act to mitigate the emergency condition by requesting emergency assistance when an emergency assistance request was required.
Response: The EOP VSL DT adopted part of your suggestion for modification to the Severe VSL.					
Dominion	R8		A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area		

Standard Number EOP-002-2 Capacity and Energy Emergencies					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
			experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert **Level 1** as detailed in Attachment 1-EOP-002-0 "Energy Emergency Alert Levels." Note: Reduce to Moderate Level 1 does not require a high VSL		
Response: The EOP VSL DT accepts your suggestions and those of others and has made changes to the VSL for this requirement.					
PacifiCorp	R8	For a number of the requirements (R4, R6, R7), PacifiCorp notes that the general trend is to increase the level of severity, and in a number of cases the eliminate a "Lower" VSL. PacifiCorp reiterates its position that some of the requirements remain ambiguous and that simply increasing the severity levels for unclear requirements will not improve reliability to the BES. If Responsible Entities do not know what constitues compliance in the first place, more severe penalties do not provide any added incentive to be compliant.			
Response: The revised VSLs deleted ambiguous language referring to "procedural elements" and reflect the language of the Requirement. The DT decided non-compliance with the EEA process did not meet the intent of the Requirement and would result in at least a Moderate VSL. **A Violation Severity Level (VSL) is defined as an after the fact look at how well the intent of the requirement was met (or how severely violated) it does not depend on BES impact, which is covered by Violation Risk Factor (VRF). Missing the intent of the requirement must be a severe level of VSL.**					
Entergy Services	R9.1				. . . failed to request its Reliability Coordinator initiate an Energy Emergency Alert . . .
Response: The EOP VSL DT accepts your suggested editorial change.					
Dominion	R9.1-9.4	Should be rolled into R9	Should be rolled into R9	Should be rolled into R9	Should be rolled into R9
Response: The EOP VSL DT does not accept your suggested changes. The VSLs have been removed from the main requirement as it contains no performance. Because one of the subrequirements (R9.1) is assigned to the Load-serving Entity, and others are assigned to the Reliability Coordinator, this set of subrequirements could not be rolled up into a single set of VSLs for the entire requirement (R9).					
Southern Co Trans	R9.2, R9.3 and R9.4/VSL – Binary or not, it defies logic that the failure (1) to submit a report to NERC for posting on its website or (2) the failure to use EEA-1 or EEA-2 to announce the change of priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7 is				

Standard Number EOP-002-2 Capacity and Energy Emergencies					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
	anything but a Lower category VSL.				
	R9.2	The Reliability Coordinator failed submit the report to NERC for posting on the NERC Website, noting the expected total MW that may have its transmission service priority changed.			
	R9.3	The Reliability Coordinator failed to use EEA 1 to forecast the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.			
	R9.4	The Reliability Coordinator failed to use EEA 2 to announce the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.			
Response: The EOP VSL DT does not accept your suggested changes. The Severe VSL reflects the non-compliance with the intent of the subrequirement , not the impact on the BES which is reflected in the VRF.					
SERC OC SRC	R9.2	Comment: This requirement is the clearest evidence yet that all binary requirements should not be severe			
	R9.3	Comment: This is another requirement with clear evidence that all binary requirements should not be severe			
Response: The drafting team believes that the challenge with the VSLs resides primarily with the way the requirements were written, and modifying the requirements is outside the scope of the DT.					

Standard Number EOP-002-2 Capacity and Energy Emergencies					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
PacifiCorp	R9.4	For a number of the requirements (R4, R6, R7), PacifiCorp notes that the general trend is to increase the level of severity, and in a number of cases the eliminate a "Lower" VSL. PacifiCorp reiterates its position that some of the requirements remain ambiguous and that simply increasing the severity levels for unclear requirements will not improve reliability to the BES. If Responsible Entities do not know what constitues compliance in the first place, more severe penalties do not provide any added incentive to be compliant.			
Response: The DT decided subrequirements 9.1 – 9.4 should be "binary" meaning a Severe VSL if any part of the subrequirement was not met. The purpose of "rolling up" subrequirements into the Requirement is to eliminate the possibility of double jeopardy, not to increase the severity level for the subrequirement. **A Violation Severity Level (VSL) is defined as an after the fact look at how well the intent of the requirement was met (or how severely violated) it does not depend on BES impact, which is covered by Violation Risk Factor (VRF). Totally missing the intent of the requirement must be a severe level of VSL.**					

3. Please review the proposed VLS for EOP-003-1 Load Shedding Plans. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Summary Consideration: The DT made minor editing and format changes as per industry suggestions, including the following:

R3 VSLs – made some minor edits to provide greater clarity around the use of %

R4 VSLs – modified the language in the Severe to more closely match the language in the associated FERC directive

R6 VSLs – corrected typographical errors in the Lower and Severe VSLs

R7 VSLs – made some minor edits to provide greater clarity around the use of %

Several suggestions were made that would require interpretation of and/or expansion on the language of the requirements which is beyond the scope of the DT. Several of the suggested changes were not made since the VSL was based on specific FERC directives.

Standard Number EOP-003-1 Load Shedding Plans					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
IESO	R3	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting 5% or less of its required entities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting more than 5% but not more than 10% of its required entities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting more than 10% but not more than 15% of its required entities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting more than 15% of its required entities.
Response: The EOP VSL DT revised the language of the VSLs in support of your suggestion.					
Georgia System Ops	R3.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting less than 25% of its	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting 25% or more but less	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting 50% or more but less	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting more than 75% of its

Standard Number EOP-003-1 Load Shedding Plans					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
		required entities.	than 50% of its required entities.	than 75% of its required entities.	required entities.
Response: The EOP VSL DT does not accept the suggested language. The percentages used in the VSLs were directed by FERC in its June 19, 2008 VSL Order.					
Entergy Services	R3	The responsible entity did not coordinate load shedding plans affecting 5% or less of its required entities, as directed by the requirement.	The responsible entity did not coordinate load shedding plans affecting between 5-10% of its required entities, as directed by the requirement.	The responsible entity did not coordinate load shedding plans affecting between 10-15% inclusive of its required entities, as directed by the requirement.	The responsible entity did not coordinate load shedding plans affecting more than 15% of its required entities, as directed by the requirement.
Response: The EOP VSL DT had made changes to the language of the VSLs based on your comments and those of others.					
Dominion Resources	R4	The Transmission Operator or Balancing Authority demonstrated the existence of a load shedding scheme but failed to show it considered one of these factors in designing the automatic load shedding scheme: frequency, rate of frequency decay, voltage level, rate of voltage decay, or power flow levels.	The Transmission Operator or Balancing Authority demonstrated the existence of a load shedding scheme but failed to show it considered two these factors in designing the automatic load shedding scheme: frequency, rate of frequency decay, voltage level, rate of voltage decay, or power flow levels.	The Transmission Operator or Balancing Authority demonstrated the existence of a load shedding scheme but failed to show it considered three of these factors in designing the automatic load shedding scheme: frequency, rate of frequency decay, voltage level, rate of voltage decay, or power flow levels.	The Transmission Operator or Balancing Authority demonstrated the existence of a load shedding scheme but failed to show it considered more than 3 of these factors in designing the automatic load shedding scheme: frequency, rate of frequency decay, voltage level, rate of voltage decay, or power flow levels.
Response: T**he EOP VSL DT does not accept the suggested language. The VSLs are stated to meet a FERC directive.**					
IESO	R6	Not sure what “Original R6” means here.			Please check if the “No changes” is correct since the original Severe is now N/A.
Response: There was a typographical error in the posted version of EOP-003 R6 VSLs and the VSL for Severe should have been identical to the last posting. This has been corrected.					
IESO	R7	Please check for consistency of the % threshold among requirements and standards.	Ditto	Ditto	Ditto

Standard Number EOP-003-1 Load Shedding Plans					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
		Some use up to a certain percent which includes equal to that percentage, others use less than that percentage. For example, under High, R7 says "less than 15% but R3 says 10-15%, inclusive.			
Response: The EOP VSL DT examined the language and did not believe changes were necessary except where highlighted for R3.					
Entergy Services	R7	The responsible entity did not coordinate automatic load shedding with 5% or less of its required entities by utilizing the types of automatic actions described in the requirement.	The responsible entity did not coordinate automatic load shedding with more than 5% but less than 10% of its required entities by utilizing the types of automatic actions described in the requirement.	The responsible entity did not coordinate automatic load shedding with 10% or more but less than 15% of its required entities by utilizing the types of automatic actions described in the requirement.	The responsible entity did not coordinate automatic load shedding with 15% or more of its required entities by utilizing the types of automatic actions described in the requirement.
Response: The EOP VSL DT does not accept the suggested language. Language used in the VSLs reflects the language of the requirement R7 and was directed by FERC. The suggested language includes "required entities" which is not stated in R7. VSLs cannot expand on the language of the associated Requirement.					
Georgia System Ops	R7.	The responsible entity did not coordinate automatic load shedding with less than 25% of the types of automatic actions described in the Requirement.	The responsible entity did not coordinate automatic load shedding with 25% or more but less than 50% of the types of automatic actions described in the Requirement.	The responsible entity did not coordinate automatic load shedding with 50% or more but less than 75% of the types of automatic actions described in the Requirement.	The responsible entity did not coordinate automatic load shedding with 75% or more of the types of automatic actions described in the Requirement.
Response: The EOP VSL DT does not accept the suggested language. Language used in the VSLs reflects the language of R7 and was directed by FERC.					
WE Energies	R7.	The responsible entity did not coordinate 5% or less of automatic load shedding relays with the types of automatic actions	The responsible entity did not coordinate 5% or more but less than 10% of automatic load shedding relays with the types of automatic actions described in the	The responsible entity did not coordinate 10% or more but less than 15% of automatic load shedding relays with the types of automatic actions described in the	The responsible entity did not coordinate 15% or more of automatic load shedding relays with the types of automatic actions

Standard Number EOP-003-1 Load Shedding Plans					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
		described in the Requirement.	Requirement.	Requirement.	described in the Requirement.
Response: The EOP VSL DT does not accept the suggested language. Language used in the VSLs reflects the language of R7 and was directed by FERC. The suggested language includes "load shedding relays" which may be implied but is not stated in R7. VSLs cannot expand on the language of the associated Requirement.					
IESO	R8	OK	OK	The responsible entity had plans for manual load shedding but did not have the capability to implement the load shedding, as directed by the requirement.	OK
Response: The EOP VSL DT did not make any changes based on your comments. The VSL uses language from the FERC directive.					
Georgia System Ops	R8	N/A	The responsible entity did not have plans for operator controlled manual load shedding, as directed by the requirement but had the capability to implement manual load shedding.	The responsible entity has plans for manual load shedding but did not have the capability to implement the load shedding, as directed by the requirement.	The responsible entity did not have plans for operator controlled manual load shedding, as directed by the requirement nor had the capability to implement the load shedding, as directed by the requirement.
Response: The EOP VSL DT does not accept the suggested language. Language used in the VSLs reflects the language of R8 and was directed by FERC.					

4. Please review the proposed VLS for EOP-004-1 Disturbance reporting. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Summary Consideration: The DT made minor editing and format changes as per industry suggestions to the following sets of VSLs:

R2 VSLs - made some minor edits to provide greater clarity around the use of %

R3 VSLS – clarified the wording in the High and Severe VSLs

R3.1 VSLs – modified the wording of all VSLs for greater clarity

R5 VSLs – modified the wording of the Moderate and Severe VSLs for greater clarity

Several suggestions were made that would require interpretation of and/or expansion on the language of the requirements which is beyond the scope of the DT. Several of the suggested changes were not made since the VSL was based on specific FERC directives.

Standard Number EOP-004-1 Disturbance Reporting					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
IESO	R2	OK	OK	OK	The responsible entity failed to promptly analyze more than 15% of its disturbances on the BES.
Response: The EOP VSL DT has made some changes to the VSL language based on your comments and the comments of others.					
SERC OC SRC	R2	Comment: NERC should define a BES disturbance. NERC should also remove vague timing terms such as “promptly” from VSLs. As written, these VSLs enable compliance auditors to have a blank check on the non-compliance entities” bank account			
Response: The EOP VSL DT has used the language of the requirement in preparing VSLs; interpretation of the language is beyond the scope of this DT. Changes to the language of the requirements and definitions can be accomplished by submitting such changes through the SAR process.					

Standard Number EOP-004-1 Disturbance Reporting					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
Entergy Services	R2		The responsible entity failed to promptly analyze more than 5% but less than 10% of its disturbances on the BES.	The responsible entity failed to promptly analyze 10% or more but less than 15% of its disturbances on the BES.	
Response: The EOP VSL DT has made some changes to the language of the VSL based on your comments and those of others.					
AEP	R2	The responsible entity failed to promptly analyze 5% or less of its disturbances on the BES. Please define "promptly"	The responsible entity failed to promptly analyze more than 5% up to 10% of its disturbances on the BES. Please define "promptly"	The responsible entity failed to promptly analyze 10% up to 15% of its disturbances on the BES. Please define "promptly"	The responsible entity failed to promptly analyze 15% or more of its disturbances on the BES. Please define "promptly"
Response: The EOP VSL DT has used the language of the requirement in preparing VSLs, interpretation of the language is beyond the scope of this DT.					
IESO	No need to use bullets for the 2 conditions				
	R3			The responsible entity experienced a reportable incident and failed to provide a preliminary written report to either the RRO or NERC.	The responsible entity experienced a reportable incident and failed to provide a preliminary written report as directed by the requirement to both the RRO and NERC.
Response: The EOP VSL DT has made some changes to the VSL language based on your comments.					
Southern Co Trans	R3	The responsible entity experienced a reportable incident and failed to provide a preliminary written report to one of the following: • RRO • NERC	The responsible entity experienced a reportable incident and failed to provide a preliminary written report as directed by the requirement to both of the following: • RRO		R3

Standard Number EOP-004-1 Disturbance Reporting					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
			• NERC		
Response: A Violation Severity Level (VSL) is defined as an after the fact look at how well the intent of the requirement was met (or how severely violated) it does not depend on BES impact, which is covered by Violation Risk Factor (VRF). Missing the intent of the requirement must be a severe level of VSL.					
BPA	R3	This report is not critical to the system, so the VSLs seem too high.			
Response: System impact is measured by the Violation Risk Factor (VRF). The VSL is a measure of how well the intent of the requirement has been met.					
Entergy Services	R3.1	The responsible entity submitted the report as required in R3.1 more than 24 but less than or equal to 36 hours after the disturbance or unusual occurrence or the discovery of the disturbance or unusual occurrence.	The responsible entity submitted the report as required in R3.1 more than 36 but less than or equal to 48 hours after the disturbance or unusual occurrence or the discovery of the disturbance or unusual occurrence.	The responsible entity submitted the report as required in R3.1 more than 48 but less than or equal to 72 hours after the disturbance or unusual occurrence or the discovery of the disturbance or unusual occurrence.	The responsible entity submitted the report as required in R3.1 72 hours or more after the disturbance or unusual occurrence or the discovery of the disturbance or unusual occurrence.
Response: The EOP VSL DT has made some changes to the language of the VSL based on your comments.					
BPA	R3.4	Suggest changing the language to say x days past the RRO requested due date.			
Response: The EOP VSL DT did not make any change – the original language, ". . . past the 60 day due date." provides as much clarity as the proposed, ". . . past the RRO requested due date."					
Dominion Resources	R5		The Regional Reliability Organization reviewed the final report recommendations twice per year for greater than 74% but less than 100% of the recommendations.		
Response: The EOP VSL DT has made some changes to the language of the VSL based on your comments.					

Standard Number EOP-004-1 Disturbance Reporting					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
IESO	R5				The Regional Reliability Organization did not review the final report recommendations at least twice each year or did not notify the NERC Planning and Operating Committees that the recommendations were not being acted upon.
Response: The EOP VSL DT has made changes to the VSL language based on your recommendation.					

5. Please review the proposed VLS for EOP-005-1 System Restoration Plans. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Summary Consideration: In response to industry comments, VSLs for R1 were re-drafted using discrete numbers instead of percentages.

R1 VSLs - modified to use discrete numbers rather than percentages

R4 VSLs - removed capitalization from the word "Requirement" and modified the percentage language for consistency

R6 VSLS – modified the percentage language for consistency

R11 VSLs – modified to use discrete numbers rather than percentages

To reduce the potential for multiple jeopardy, sub-sub- requirements R 11.5.1 – R11.5.4 were rolled up into sub-requirement R11.5. To avoid double jeopardy, R11.5 was not rolled up into R11 and was assigned a severe VSL.

The industry expressed concerns regarding the use of percentages rather than describing specific types of noncompliant performance and changes were made in some instances based on these comments and in others the use of percentages was retained. Some expressed a desire to use the quartile method of describing noncompliant performance, but based on FERC guidance, the incremental percentages used to describe noncompliant performance were retained with 5% increments between VSLs. The use of percentages provides some flexibility.

Several suggested changes were not made since they would require interpretation and/or the use of language not in the requirement.

Standard Number EOP-005-1 System Restoration Plans					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
BPA	R1	5% doesn't work for 9 elements in the attachment 0.05 * 9 = 0.45 (that's less than one element missing so there is a violation.) Would be better to say element #s. Also elements only applies if applicable.			
Response: Based on your comments and industry comments, the EOP VSL DT has expressed the VSLs for this requirement based on missing one or more of the elements listed in the attachments.					

Standard Number EOP-005-1 System Restoration Plans					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
Georgia System Ops	R1	The Transmission Operator has a restoration plan that is missing less than 25% of the applicable elements listed in Attachment 1-EOP-005.	The Transmission Operator has a restoration plan that is missing 25% or more but less than 50% of the applicable elements listed in Attachment 1-EOP-005.	The Transmission Operator has a restoration plan that is missing 50% or more but less than 75% of the applicable elements listed in Attachment 1-EOP-005.	The Transmission Operator has a restoration plan that is missing 75% or more of the applicable elements listed in Attachment 1-EOP-005.
Response: Based on yours and other industry comment, the EOP VSL DT has restated the VSLs for this requirement based on missing one or more elements rather than percentages.					
Southern Co Trans	R1	Attachment 1-EOP-005 contains nine (9) elements. According to the percentages prescribed, a Transmission Operator will never fit the "Lower" category VSL. Depending on how rounding is interpreted by an auditor, a restoration plan that is missing one (1) of the applicable elements will result in a "Severe" VSL violation. The VSL Drafting Team should re-visit all percentage driven VSLs to be sure there is a distinction that can be concluded by their use with regard to a violated standard. That is not the case here.			
Response: Based on yours and other industry comment, the VSLs for this requirement have been restated based on missing one or more elements rather than percentages.					
AEP	R2	The Transmission Operator failed to review or update its restoration plan when it made changes in the power system network **directly impacting the cranking paths.**		The Transmission Operator failed to review and update its restoration plan at least annually or whenever it made changes in the power system network **directly impacting the cranking paths**, and failed to correct deficiencies found during the simulated restoration exercises.	The Transmission Operator failed to review and update its restoration plan at least annually and whenever it made changes in the power system network **directly impacting the cranking paths**, and failed to correct deficiencies found during the simulated restoration exercises.
Response: The EOP VSL DT has not added your suggested words to the VSLs, as these words are not contained in the requirement.					
PacifiCorp	R3	This VSL is overly vague and subjective. PacifiCorp would like to see additional clarification as to what might constitute a failure to make restoration of the integrity of the interconnection a priority/			
Response: The VSL language reflects the Requirement language. Clarifications or changes to the language of the Requirements is outside the scope of the DT but may be accomplished by submitting requests for such changes through the SAR process.					

Standard Number EOP-005-1 System Restoration Plans					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
Entergy Services	R4	Change “Requirement” to “requirement”.	Change “Requirement” to “requirement”.	Change “Requirement” to “requirement”. Remove comma.	Change “Requirement” to “requirement”.
Response: The EOP VSL DT adopted your suggestion and removed the capitalization from the word, “requirement” in all four of the VSLs.					
Georgia System Ops	R4	The Transmission Operator failed to coordinate its restoration plans with 25% or less of the entities identified in the Requirement.	The Transmission Operator failed to coordinate its restoration plans with more than 25% but less than 50% of the entities identified in the Requirement.	The Transmission Operator failed to coordinate its restoration plans with 50% or more, but less than 75% of the entities identified in the Requirement.	The Transmission Operator failed to coordinate its restoration plans with 75% or more of the entities identified in the Requirement.
Response: The EOP VSL DT has not made the suggested changes to the percentages. Some Transmission Operators have numerous other entities with whom they are required to coordinate and failure to coordinate with a significant percentage does not seem appropriate for reliable operations. The 5% increments used in the VSLs are consistent with the FERC guidance for writing VSLs.					
Entergy Services	R6		Remove comma.		
Response: The EOP VSL DT has accepted your suggestions on punctuation modifications.					
Georgia System Ops	R6	The Transmission Operator or Balancing Authority failed to train less than 25% of its operating personnel in the implementation of the restoration plan.	The Transmission Operator or Balancing Authority failed to train 25% or more, but less than 50 % of its operating personnel in the implementation of the restoration plan.	The Transmission Operator or Balancing Authority failed to train 50 % or more but less than 75% of its operating personnel in the implementation of the restoration plan.	The Transmission Operator or Balancing Authority failed to train 75% or more of its operating personnel in the implementation of the restoration plan.
Response: The EOP VSL DT has not made the suggested changes to the percentages. The 5% increments used in the VSLs are consistent with the FERC guidance for writing VSLs.					
Entergy Services	R7				Remove “by”.
Response: The EOP VSL DT believes that maintaining the word “by” adds clarification.					

Standard Number EOP-005-1 System Restoration Plans					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
Georgia System Ops	R9	The Transmission Operator failed to document the Cranking Paths, including initial switching requirements, between the blackstart generating unit and less than 25% of the unit(s) to be started.	The Transmission Operator failed to document the Cranking Paths, including initial switching requirements, between the blackstart generating unit and more than 25% but less than 50% of the unit(s) to be started.	The Transmission Operator failed to document the Cranking Paths, including initial switching requirements, between the blackstart generating unit and more than 50% but less than 75% of the unit(s) to be started.	The Transmission Operator failed to document the Cranking Paths, including initial switching requirements, between the blackstart generating unit and more than 75% of the unit(s) to be started.
Response: The EOP VSL DT has not made the suggested changes to the VSLs, as the language of the Requirement is specific that the information on Cranking Paths must be documented and provided as requested.					
Entergy Services	R10	Replace comma with period at end of statement.	Remove commas after “more”, after “demonstrate” and after “testing”.	Remove commas after “more”, after “demonstrate” and after “testing.	Remove commas after “demonstrate” and after “testing”.
Response: The EOP VSL DT has made modifications to some punctuation based on your suggestions and those of other industry members.					
Georgia System Ops	R10 & 10.1 combined (VSLs for R10.1 set to N/A)				
	R10 & 10.1	For less than 25% of the blackstart generating units in its restoration plan , the Transmission Operator failed to demonstrate, through simulation or testing at least once every five years, that these blackstart generating units can perform their intended functions as required in the regional restoration plan,	For 25% or more, but less than 50% of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate, through simulation or testing at least once every five years, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.	For 50% or more, but less than 75% of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate, through simulation or testing at least once every five years, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.	For 75% or more of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate, through simulation or testing at least once every five years, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.
Response: The EOP VSL DT has not made changes to the VSLs. R10 and 10.1 are independent actions that take place in different time periods. In addition to being outside the scope of the DT, combining R10 and 10.1 creates numerous compliance measurement issues.					
Entergy Services	R11	. . . 75% or more but less than 100% of sub-requirements . . .	. . . 50% or more but less than 75% of sub-requirements . . .	. . . of sub-requirements . . .	. . . of sub-requirements . . .

Standard Number EOP-005-1 System Restoration Plans					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
Response: The DT has not changed the word subrequirements for consistency purposes.					
SERC OC SRC	R11	The responsible entity immediately began to restore the Bulk Electric System to normal and complied with 3 or more, but less than 100% of sub-requirements R11.1, R11.2, R11.3, and R11.4.	The responsible entity immediately began to restore the Bulk Electric System to normal and complied with 2 or more, but less than 3 of sub-requirements R11.1, R11.2, R11.3, and R11.4.	The responsible entity immediately began to restore the Bulk Electric System to normal and complied with 1 or more but less than 2 of sub-requirements R11.1, R11.2, R11.3, and R11.4.	The responsible entity immediately began to restore the Bulk Electric System to normal and complied with less than 1 of sub-requirements R11.1, R11.2, R11.3, and R11.4.
Response: The EOP VSL DT has revised the VSLs for this by replacing the use of percentages with the use of discrete numbers. (Lower is missing one of the subrequirements, etc.)					
BPA	R11	add as applicable to subrequirements (some places may not have a nuclear generator?)			
Response: Decisions on which sub-requirements are applicable is a compliance issue. VSLs reflect the language used in the Requirement or sub-requirement.					
IRC SRC **IESO**	R11.5	There is a difference in R11.5 and its sub-requirements between the set posted in the revised VSL document and the set proposed in the Consideration of Comment. We support the latter set since it rolled up R11.5.1 to R11.5.4 to the VSLs for R11.5.	Ditto	Ditto	Ditto
Response: The EOP VSL DT could not find the difference you are referencing. However, the VSLs for F11.5 that are proposed do address the noncompliant performance of the sub-subrequirements of R11.5.					

6. Please review the proposed VLS for EOP-006-1 Reliability Coordination – System Restoration. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Summary Consideration: The DT made minor editing and format changes to the VSLs for Requirement R1 per industry suggestions.

R1 VSLs - made minor typographical edits and modified the language in the percentages for consistency between standards

Standard Number EOP-006-1 Reliability Coordination - System Restoration					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
IESO	R1	The Reliability Coordinator is not aware of less than 5% of its Transmission Operators' restoration plans.			
Response: The EOP VSL DT has made the slight modification based on your suggestion and of others industry members.					
Dominion Resources	R1	The Reliability Coordinator is not aware of less than 5% of its Transmission Operators' restoration plans.			
Response: The EOP VSL DT has made the slight modification based on your suggestion and of others industry members.					
Entergy Services	R1	Insert "of" after "aware".	Remove comma after "more".	Remove comma after "more".	
Response: The EOP VSL DT has made the slight modification based on your suggestion and of others industry members.					
SERC OC SRC	Comment: Should be binary – failure to monitor cannot be measured!				

Standard Number EOP-006-1 Reliability Coordination - System Restoration					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
	R2				The Reliability Coordinator failed to coordinate needed assistance when requested
Response: The EOP VSL DT has used the language of the requirement in preparing VSLs - the requirement has two conditions if only one is met the severity level is High and if both are not met the severity level is Severe.					
Entergy Services	R4				Remove “Requirement”.
Response: The EOP VSL DT did not make the suggested change because this is the format for making a cross reference to a requirement within a standard.					

7. Please review the proposed VLS for EOP-008-1 Plans for Loss of Control Center Functionality. Then in the following table, please provide alternate language for any VSLs that you disagree with.

Summary Consideration: The DT made minor editing changes as per industry suggestions.

Standard Number EOP-008-1 Plans for Loss of Control Center Functionality					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
Entergy Services	R1	Replace “subrequirements” with “sub-requirements”.	Replace “subrequirements” with “sub-requirements”.	Replace “subrequirements” with “sub-requirements”.	Replace “subrequirements” with “sub-requirements”. Replace “R11” with “R1.1”.
Response: The EOP VSL DT has modified the Lower VSL based on your comment. In order to be consistent the DT has retained the word subrequirements.					

8. Please review the proposed VLS for EOP-009-1 Documentation of Backstart Generating Unit Test Results. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the standard number and requirement number for each proposed revision.

Summary Consideration: The DT made minor editing and format changes as per industry suggestions to the following:

R1 VSLs - corrected typographical errors in the Moderate and Severe VSLs and modified percentage language for consistency

R2 VSLs – added another type of noncompliant performance to the Severe VSLs

Standard Number EOP-008-1 Plans for Loss of Control Center Functionality					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
IESO	R1	OK	OK	OK	The Generator Operator failed to test 15% or more of the required blackstart units. OR The Generator Operator's testing records for Requirement R1 are missing 15% or more of the required information.
Response: The EOP VSL DT has made minor editorial changes to VSL language based on your suggestion.					
Entergy Services	R1		No change. OR Remove comma after "more".	No change. OR Remove comma after "more".	Remove "more than". OR
Response: The EOP VSL DT has made the change to the VSL as suggested.					
Dominion Resources	R1	The Generator Operator's testing records for Requirement R1 are missing up to 5% of the required information.	The Generator Operator failed to test 5% or more but less than 10% of the required blackstart units. OR The Generator Operator's testing	The Generator Operator failed to test 10% or more but less than 15% of the required blackstart units OR	The Generator Operator failed to test more than 15% or more of the required blackstart units. OR .The Generator Operator's testing

Standard Number EOP-008-1 Plans for Loss of Control Center Functionality					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
			records for Requirement R1 are missing one of the data required information.	The Generator Operator's testing records for Requirement R1 are missing two of the data required information.	records for Requirement R1 are missing all of the data required information.
Response: The EOP VSL DT did not make any changes; the DT is using percentages based on the FERC guidelines.					
SERC OC SRC	comment The "or" comment in moderate high and severe should be removed – R1 does not require test documentation. Even if documentation is considered in the VSL level, lack of documentation is not as severe as lack of testing.				
	R1 -	The Generator Operator's testing records for Requirement R1 are missing up to 5% of the required information.	The Generator Operator failed to test 5% or more but less than 10% of the required blackstart units.	The Generator Operator failed to test 10% or more but less than 15% of the required blackstart units	The Generator Operator failed to test more than 15% or more of the required blackstart units.
Response: The EOP VSL DT did not make any changes. The VSL language reflects the language in the requirement-- it requires the information specified in the requirement.					
IESO	R2	The previous condition for failure to provide the documentation requested to NERC disappeared. Should it be retained.			
Response: The EOP VSL DT has made minor editorial changes to VSL language based on your suggestion.					
IRC SRC	A condition (provide document to NERC when requested) is missing.				
	R2				The Generator Owner or Generator Operator did not provide the required blackstart documentation to its Regional Reliability Organization or upon request to NERC.
Response: The EOP VSL DT has added the language to the VSL as suggested by you and other industry members. This language is part of and/or consistent with the requirement.					

Standard Number EOP-008-1 Plans for Loss of Control Center Functionality					
Commenter	**R #**	**Alternate Lower VSL Language**	**Alternate Moderate VSL Language**	**Alternate High VSL Language**	**Alternate Severe VSL Language**
AEP	Revised R2	The Generator Owner or Generator Operator did not provide the required blackstart documentation to its Regional Reliability Organization on a timely basis, but within one week of the due date.	The Generator Owner or Generator Operator did not provide the required blackstart documentation to its Regional Reliability Organization on the due date for two consecutive periods or three non-consecutive periods.	The Generator Owner or Generator Operator did not provide the required blackstart documentation to its Regional Reliability Organization on the due date for four or more occasions.	The Generator Owner or Generator Operator did not provide the required blackstart documentation to its Regional Reliability Organization within one week of the due date.
Response: The EOP VSL DT has made changes to the VSL language based on your suggestions, and added Generator Owner. The Standard does not discuss time constraints and therefore are not included in the VSL.					

9. If you have any other comments on the proposed VSLs for the EOP standards that you haven't covered in your recommendations above, please provide them here.

Summary Consideration: Please see responses to individual comments.

Organization	Question 9 Comments
IRC Standards Review Committee	We commend the DT for responding to industry comments on the last posting. This combined with FERC's guideline has resulted in much improved VSLs for these standards despite the standards as written do not lend themselves to facilitate effective VSL development.
Response: The EOP VSL DT thanks you for your comments.	
Independent Electricity System Operator	We commend the DT for responding to industry comments on the last posting. This combined with FERC's guideline has resulted in much improved VSLs for these standards despite the standards as written do not lend themselves to facilitate effective VSL development. Some attention needs to be paid to achieving consistency in the language and cut-off percentages used in the graded VSLs in this posting, as well as postings for other standards that will be reviewed in future.
Response: The EOP VSL DT thanks you for your comments.	
Bonneville Power Administration	For the most part, the EOP VSLs have added clarity from the last version. Unfortunately, in this version, there is a clear trend of the VSLs having a lower threshold for non-compliance. Many of the percentage levels for graduated low to severe levels have effectively been lowered. This means it will take less to end up in the "severe" category. Additionally, many requirements have one VSL, for when you comply with the requirement or you don't, and almost all instances of when you don't comply have been moved to the "severe" column. The increase in severity seems unnecessary to have compliance.
Response: The EOP VSL DT thanks you for your comments. The DT has followed the FERC guidelines in revising the VSLs. Requirements that are binary in nature are either met or not met. If the intent of the requirement is not met the severity level can only be severe. VSLs are not a measure of the impact on reliability of the BES; reliability impact is measured by the VRF. The VSLs measure how much the entity has missed or not complied with the intent of the requirement.	
Entergy Services	Several of the VSLs use percentages for measurement. Regardless of which format is used to represent these percentages (i.e., "5% or greater but less than 10%", "from 5% up to 10%", etc.), the same format should be used throughout all of the EOP Standards.
Response: The EOP VSL DT thanks you for your comments. The DT has attempted to apply your suggestion.	

Organization	Question 9 Comments
Dominion Resources Inc.	EOP-003@R4 – Disagree with FERC directive. FERC uses escalating scales in what appears to be random fashion throughout the EOP standards. The impact on reliability is no worse in this requirement than in requirement 7. There FERC used an escalating scale. EOP-009 @ R1 only requires test records to include "the dates of the tests, the duration of the tests, and an indication of whether the tests met Regional BCP requirements" This is 3 items. How does one break that into 5% increments?
Response: EOP – 003 R4: The EOP VSL DT thanks you for your comments. VSLs are not a measure of the impact on reliability of the BES; reliability impact is measured by the VRF. The VSL measures how much the entity has missed or not complied with the intent of the requirement. **EOP-009 R1: Percentages are used as guidelines to assign VSLs and are not customized to obtain whole numbers in each situation. A Generator Owner may have several blackstart units which means there could be multiple entries in each of the 3 categories mentioned in the comment and any regional data requirements.**	
Southern Company – Transmission	Southern Company appreciates the difficult work performed by the Emergency Operations Planning Violation Severity Levels Drafting Team in this second draft of proposed Violation Severity Levels.
Response: The EOP VSL DT thanks you for your comments.	
MRO Standards Review Committee	The MRO NSRS commends the EOP VSL drafting team on their efforts with the EOP VSLs.
Response: The EOP VSL DT thanks you for your comments.	
Georgia System Operations Corp.	Fifteen Percent - VSLs are supposed to be 4 levels of violating a requirement from a small infraction to a huge infraction or somewhere in between. - Missing all aspects of a requirement is a huge infraction and should be Severe. - It is not a huge infraction to miss more than 15% but less than 25% of the aspects of a requirement and it should not be Severe. In fact, any violation that misses less than 25% of the aspects should be Lower. - Moderate should be from 25% to 50% and High should be from 50% to 75%. - Although 75% is not a complete violation, it could be made Severe to miss from 75% to 100% of the aspects of a requirement. - These ranges truly reflect degrees of infraction and have nothing to do with risk or consequences as is appropriate. Ranges of only 5% seem to be based on some perceived degree of risk or consequences of the slightest infraction and not on degrees of violation. - A severe violation of one requirement may not have the same risk or consequences as a severe violation of another requirement but they are both huge infractions.

Organization	Question 9 Comments
	Penalty Matrix - The concept of violating a requirement at varying degrees does not apply to a binary violation. The original concept was based on the assumption that a violation could be determined to be a small infraction of the rule, a huge infraction, or somewhere in between. - This assumption is not the case for many requirements. Some requirements are pass/fail requirements. These are called "binary" violations. - A binary violation is not a small infraction. It is not a huge infraction. It has no level at all. It is just a violation. - The 3x4 matrix was developed to implement the concept of violating requirements in degrees of severity. It does not apply to a binary violation which has no degrees of severity. The CMEP program should be modified to recognize violations with no degrees of severity. - What may be appropriate is a 3x1 matrix (a column) for binary violations with a range of penalties for each level of risk (VRF). (Not for EOP VSL Drafting Team but for NERC procedures) The third dimension - With a 3x4 matrix for violations of varying degrees of severity and a 3x1 matrix for binary violations, there is still a factor that is missing. This factor is basically a third dimension to each matrix. - This third dimension is the degree to which a given violation rises to the level of risk as expressed in the VRF. - A High VRF for a requirement represents a worse case scenario. A violation of such a requirement is judged in the abstract to be a high risk to the integrity of the BES. The third dimension is a measure (or judgment) of how high "up the scale" to the worse case risk expressed in the VRF that the actual violation rose. - A BA with an L_{10} of 7.59 has a certain chance, when being outside of L_{10}, of affecting neighbors and putting the integrity of the BES at risk. A BA with an L_{10} of 278 MW has a different chance, when being outside of L_{10}, of affecting neighbors and putting the integrity of the BES at risk. There are degrees of rising to the level of risk as expressed in the VRF for a failure of CPS2 depending on the size of the L_{10} of the BA. One entity's CPS2 failure does not carry the same risk as another entity's failure. It does not rise as far up the scale to the level of risk represented by the VRF as another. - Failing to meet NERC requirements when taking a 115 KV line out of service carries a different risk of affecting neighbors and putting the integrity of the BES at risk than failing to meet NERC requirements when taking a 500 KV line out of service. Violations for 115 KV lines do not rise as far up the scale to the level of risk represented by the VRF as violations for 500 KV lines. - The CMEP program should be modified to recognize this third dimension. - What may be an appropriate modification is to judge in each case the degree to which the violation in practice rises to the level of the VRF in the abstract. Such a judgment would likely involve some subjectivity but it would at least allow for better "making the punishment fit the crime." (Not for EOP VSL Drafting Team but for NERC procedures)

Organization	Question 9 Comments
Response: **Your suggestion is similar to the quartile approach recommended by the NERC VSL Development Guidelines. In general, FERC has made it clear they do not support the quartile approach but may be receptive to VSLs using 5% increments.** **Your comments on the penalty matrix and the third dimension involve issues beyond the scope of the EOP VSL DT. We refer you to the NERC Standards Development Process for ways to pursue changes to NERC Reliability Standards via the SAR process.**	
PacifiCorp	While PacifiCorp agrees that the approved standards development process should be used to modify the EOP VSLs (as opposed to NERC determining VSLs independently from the standards development process) because the VSLs are often de facto interpretations of the meaning of the standard requirements, PacifiCorp disagrees that there is a unique need for the EOP VSLs to be modified "as rapidly as practical." Revising the EOP VSLs as rapidly as possible seems inappropriate for a number of reasons. Many of the EOP standards remain ambiguous and unclear. Rapidly developing a VSL does not improve BES reliability if the requirement it is attached to is unclear and the Responsible Entity cannot determine whether it is complying with the language and intent of the requirement. All of the EOP standards are currently being rewritten and four of them are scheduled for retirement. The resources on both a national and local level consumed by this project could have been used to further the overall rewriting effort instead of rapidly developing VSLs on soon to be returned standards. For a number of the requirements, PacifiCorp notes that the general trend is to increase the level of severity, and in a number of cases to eliminate a "Lower" VSL. PacifiCorp reiterates its position that some of the requirements remain ambiguous and that simply increasing the severity levels for unclear requirements will not improve reliability to the BES. If Responsible Entities do not know what constitutes compliance in the first place, more severe penalties do not provide any added incentive to be compliant.
Response: The EOP VSL DT thanks you for your comments. FERC has directed that 83 standards (as they currently exist) are mandatory and enforceable. While these standards are being modified or will be modified in the future, those currently in effect are being enforced and FERC has directed that the level of violations be assessed and a penalty for violation be assigned based on: **1) The impact to reliability (impact on the BES) that a violation of the requirement or sub-requirement can cause; (this is measured by the VRF) and the severity of the violation relative to the language of the requirement (this is measured by the VSL).** **2) NERC, as the ERO, is obligated to follow FERC directives and file a VRF and VSL for each of the Requirements and sub-requirements. The process used has sought industry input, to the extent possible, and is deemed to be preferable to using a closed process with no industry input.** **3) It has been the intent of the DT to determine the level of severity or "grade" of how well the intent of the requirement has been met. There are many cases where the requirements are worded such that the required action is either done or not done (there are no incremental levels of completion that can be assigned), therefore if the condition is not met (the intent of the requirement is not achieved) the severity level can only be severe.**	