

Proposed Violation Severity Levels for the CIP, COM, and VAR Series of Standards:

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Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number CIP-001-1 Sabotage Reporting | | | | | |
|--|-----------|--------------|--|---|-----------------------|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| Original R1 | N/A | N/A | The responsible entity has procedures for the recognition of sabotage events on its facilities and multi site sabotage affecting larger portions of the Interconnection but does not have a procedure for making their operating personnel aware of said events. | The responsible entity failed to have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi site sabotage affecting larger portions of the Interconnection. | |
| Revised R1 | N/A | N/A | The responsible entity has procedures for the recognition of sabotage events on its facilities and multi site sabotage affecting larger portions of the Interconnection but does not have a procedure for making their operating personnel aware of said events. | The responsible entity failed to have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi site sabotage affecting larger portions of the Interconnection. | No changes. |
| Original R2 | N/A | N/A | The responsible entity has demonstrated the existence of a procedure to communicate information concerning sabotage events, but not all of the appropriate parties in the interconnection are | The responsible entity failed to have a procedure for communicating information concerning sabotage events. | |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number CIP-001-1 Sabotage Reporting | | | | | |
|--|-----------|--|---|---|---|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | | | identified. | | |
| Revised R2 | N/A | N/A | The responsible entity has demonstrated the existence of a procedure to communicate information concerning sabotage events, but not all of the appropriate parties in the interconnection are identified. | The responsible entity failed to have a procedure for communicating information concerning sabotage events. | No changes. |
| Original R3 | N/A | The responsible entity has demonstrated the existence of a response guideline for reporting disturbances due to sabotage events, but the guideline did not list all of the appropriate personnel to contact. | The responsible entity has demonstrated the existence of a response guideline for reporting disturbances due to sabotage events, including all of the appropriate personnel to contact, but the guideline was not available to its operating personnel. | The responsible entity failed to have a response guideline for reporting disturbances due to sabotage events. | |
| Revised R3 | N/A | The responsible entity provided its operating personnel with a sabotage response guideline, but failed to include the personnel to contact for reporting disturbances due to sabotage events. | N/A | The responsible entity failed to provide its operating personnel with a sabotage response guideline. | Modified to be consistent with the requirement. |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number CIP-001-1 Sabotage Reporting | | | | | |
|--|-----------|--------------|---|---|-----------------------|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| Original R4 | N/A | N/A | The responsible entity has established communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials, but has not developed a reporting procedure. | The responsible entity failed to establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials, nor developed a reporting procedure. | |
| Revised R4 | N/A | N/A | The responsible entity has established communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials, but has not developed a reporting procedure. | The responsible entity failed to establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials, and has not developed a reporting procedure. | Clarified language. |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number COM-001-1 Telecommunications | | | | | |
|--|---|--|---|---|---|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| Original R1 | The responsible entity's telecommunications is not redundant or diversely routed as applicable by other operating entities for the exchange of interconnection or operating data. | The responsible entity's telecommunications is not redundant or diversely routed as applicable and has failed to establish telecommunications internally for the exchange of interconnection or operating data needed to maintain BES reliability. | The responsible entity's telecommunications is not redundant or diversely routed as applicable and has failed to establish telecommunications internally and with other Reliability Coordinators, Transmission Operators, or Balancing Authorities for the exchange of interconnection or operating data needed to maintain BES reliability. | The responsible entity's telecommunications is not redundant or diversely routed as applicable and has failed to establish telecommunications internally and with both other and its Reliability Coordinators, Transmission Operators, or Balancing Authorities for the exchange of interconnection or operating data needed to maintain BES reliability. | |
| Revised R1 | N/A | The responsible entity failed to provide adequate and reliable telecommunications facilities for the exchange of Interconnection and operating information as to one of the groups specified in R1.1, or R1.2, or R1.3. | The responsible entity failed to provide adequate and reliable telecommunications facilities for the exchange of Interconnection and operating information <u>to</u> two of the groups specified in R1.1, or R1.2, or R1.3. | The responsible entity failed to provide adequate and reliable telecommunications facilities for the exchange of Interconnection and operating information to all 3 of the groups specified in R1.1, or R1.2, or R1.3. OR The responsible entity's telecommunications is not redundant or diversely | Rolled up the subrequirements. Minor word changes for clarity. |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number COM-001-1 Telecommunications | | | | | |
|--|--|--------------|----------|---|-----------------------|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | | | | routed as applicable as specified in R1.4 | |
| Original R1.1 | The responsible entity has failed to establish telecommunications internally for the exchange of interconnection or operating data needed to maintain BES reliability. | N/A | N/A | N/A | |
| Revised R1.1 | N/A | N/A | N/A | N/A | Rolled up into R1. |
| Original R1.2 | The responsible entity has failed to establish telecommunications with its Reliability Coordinator, Transmission Operators, or Balancing Authorities for the exchange of interconnection or operating data needed to maintain BES reliability. | N/A | N/A | N/A | |
| Revised R1.2 | N/A | N/A | N/A | N/A | Rolled up into R1. |
| Original R1.3 | The responsible entity has failed to establish telecommunications with | N/A | NA | N/A | |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number COM-001-1 Telecommunications | | | | | |
|--|--|---|---|---|--|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | other Reliability Coordinators, Transmission Operators, or Balancing Authorities for the exchange of interconnection or operating data needed to maintain BES reliability. | | | | |
| Revised R1.3 | N/A | N/A | N/A | N/A | Rolled up into R1. |
| Original R1.4 | The responsible entity's telecommunications is not redundant or diversely routed where applicable for the exchange of interconnection or operating data. | N/A | N/A | N/A | |
| Revised R1.4 | N/A | N/A | N/A | N/A | Rolled up into R1. |
| Original R2 | N/A | The responsible entity has failed to manage, alarm, and test or actively monitor its emergency telecommunications facilities. | The responsible entity has failed to manage, alarm, and test or actively monitor its primary telecommunications facilities. | The responsible entity has failed to manage, alarm, and test or actively monitor its primary and emergency telecommunications facilities. | |
| Revised R2 | N/A | The responsible entity has failed to manage, alarm, and test or actively monitor | The responsible entity has failed to manage, alarm, and test or actively monitor | The responsible entity has failed to manage, alarm, and test or actively monitor | No changes Conforming changes to the requirement language. |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number COM-001-1 Telecommunications | | | | | |
|--|-----------|--|---|--|-----------------------|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | | its emergency telecommunications facilities. | its primary-vital telecommunications facilities. | its primary-vital and emergency telecommunications facilities. | |
| Original R3 | N/A | N/A | The responsible entity failed to assist in the investigation and recommending of solutions to telecommunications problems within the area and with other areas. | The responsible entity failed to provide a means to coordinate telecommunications among their respective areas including assisting in the investigation and recommending of solutions to telecommunications problems within the area and with other areas. | |
| Revised R3 | N/A | N/A | The responsible entity failed to assist in the investigation and recommending of solutions to telecommunications problems within the area and with other areas. | The responsible entity failed to provide a means to coordinate telecommunications among their respective areas including assisting in the investigation and recommending of solutions to telecommunications problems within the area and with other areas. | No changes. |
| Original R4 | N/A | N/A | N/A | The responsible entity failed to provide documentation of agreement to use a | |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number COM-001-1 Telecommunications | | | | | |
|--|-----------|--------------|----------|---|--|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | | | | language other than English for all communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected Bulk Electric System. | |
| Revised R4 | N/A | N/A | N/A | The responsible entity used a language other than English and failed to have an agreement to do so. | Revised language to better align with requirement. |
| Original R5 | N/A | N/A | N/A | The responsible entity did not have written operating instructions and procedures to enable continued operation of the system during the loss of telecommunications facilities. | |
| Revised R5 | N/A | N/A | N/A | The responsible entity did not have written operating instructions and procedures to enable continued operation of the system during the loss of telecommunications facilities. | No changes. |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number COM-001-1 Telecommunications | | | | | |
|--|---|---|---|--|---|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| Original R6 | The NERCNet User Organization failed to adhere to less than 25% of the requirements listed in COM-001-0, Attachment 1, "NERCNet Security Policy". | The NERCNet User Organization failed to adhere to 25% or more but less than 50% of the requirements listed in COM-001-0, Attachment 1, "NERCNet Security Policy". | The NERCNet User Organization failed to adhere to 50% or more but less than 75% of the requirements listed in COM-001-0, Attachment 1, "NERCNet Security Policy". | The NERCNet User Organization failed to adhere to 75% or more of the requirements listed in COM-001-0, Attachment 1, "NERCNet Security Policy". | |
| Revised R6 | The NERCNet User Organization failed to adhere to less than 25% <u>or less</u> of the requirements listed in COM-001-0, Attachment 1, "NERCNet Security Policy". | The NERCNet User Organization failed to adhere to 25% or more <u>more than 5% up to (and including) 10%</u> but less than 50% of the requirements listed in COM-001-0, Attachment 1, "NERCNet Security Policy". | The NERCNet User Organization failed to adhere to 50% <u>more than 10%</u> or more but less than 15% <u>up to (and including) 15%</u> of the requirements listed in COM-001-0, Attachment 1, "NERCNet Security Policy". | The NERCNet User Organization failed to adhere to 75% or more <u>than 15%</u> of the requirements listed in COM-001-0, Attachment 1, "NERCNet Security Policy". | No changes. Modified for consistency between standards. |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number COM-002-2 Communications and Coordination | | | | | |
|---|-----------|---|---|--|--|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| Original R1 | N/A | The responsible entity did not have data links with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators. Or the responsible entity did not have voice links with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators. | The responsible entity communications was not staffed and available for addressing real time emergency conditions | The responsible entity failed to have communications (voice and data links) with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators. | |
| Revised R1 | N/A | The responsible entity did not have data links with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators. OR The responsible entity did not have voice links with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators. | N/A | The responsible entity failed to have communications (voice and data links) with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators. OR The responsible entity's communications were not staffed and available for addressing real time emergency conditions. | Moved the High to Severe as an "OR" condition. |
| Original R1.1 | N/A | N/A | The responsible entity failed to notify all other potentially affected | The responsible entity failed to notify its Reliability Coordinator, | |

| Standard Number COM-002-2 Communications and Coordination | | | | | |
|---|-----------|--|---|--|----------------------------|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | | | Balancing Authorities and Transmission Operators through predetermined communication paths of any condition that could threaten the reliability of its area or when firm load shedding is anticipated. | and all other potentially affected Balancing Authorities and Transmission Operators through predetermined communication paths of any condition that could threaten the reliability of its area or when firm load shedding is anticipated. | |
| Revised R1.1 | | N/A | The responsible entity failed to notify all other potentially affected Balancing Authorities and Transmission Operators through predetermined communication paths of any condition that could threaten the reliability of its area or when firm load shedding was anticipated. | The responsible entity failed to notify its Reliability Coordinator, and all other potentially affected Balancing Authorities and Transmission Operators through predetermined communication paths of any condition that could threaten the reliability of its area or when firm load shedding was anticipated. | Changed tense of the verb. |
| Original R2 | N/A | The responsible entity provided a clear directive in a clear, concise and definitive manner and required the recipient to repeat the directive, but did not acknowledge the recipient was correct in the | The responsible entity provided a clear directive in a clear, concise and definitive manner, but did not require the recipient to repeat the directive. | The responsible entity failed to provide a clear directive in a clear, concise and definitive manner when required. | |

| Standard Number COM-002-2 Communications and Coordination | | | | | |
|---|-----------|--|---|---|-----------------------|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | | repeated directive. | | | |
| Revised R2 | N/A | The responsible entity provided a clear directive in a clear, concise and definitive manner and required the recipient to repeat the directive, but did not acknowledge the recipient was correct in the repeated directive. | The responsible entity provided a clear directive in a clear, concise and definitive manner, but did not require the recipient to repeat the directive. | The responsible entity failed to provide a clear directive in a clear, concise and definitive manner when required. | No changes. |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number VAR-001-1 Voltage and Reactive Control | | | | | |
|--|---|---|--|---|--|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| Original R1 | The Transmission Operator has demonstrated that formal policies and procedures for monitoring and controlling voltage levels and Mvar flows have been developed, maintained, and implemented, but are missing minor details or minor program/procedural elements. | The Transmission Operator has demonstrated that formal policies and procedures for monitoring and controlling voltage levels and Mvar flows have been developed, and implemented, but the maintenance of policies and procedures is deficient with respect to at least one significant element. | The Transmission Operator has demonstrated that formal policies and procedures for monitoring and controlling voltage levels and Mvar flows have been developed, and implemented, but the maintenance of policies and procedures is deficient with respect to at least one significant element, and the TO has failed to coordinate with one of its neighboring systems. | The Transmission Operator has demonstrated that formal policies and procedures for monitoring and controlling voltage levels and Mvar flows have been developed, and implemented, but has not maintained the policies and procedures, and the TO has failed to coordinate with its neighboring systems OR The Transmission Operator does not have formal policies and procedures for monitoring and controlling voltage levels and Mvar flows | |
| Revised R1 | N/A | The responsible entity <u>Transmission Operator</u> has formal policies and procedures for monitoring and controlling voltage and MVAR flows, but they are not current. | The responsible entity <u>Transmission Operator</u> has formal policies and procedures for monitoring and controlling voltage and MVAR flows that are current, but they have not been coordinated with one or more neighboring Transmission Operators. | The responsible entity <u>Transmission Operator</u> -has formal policies and procedures for monitoring and controlling voltage and MVAR flows, but has not implemented them. OR | Changed language in response to the FERC request for clarification order. <u>Changed “responsible entity” to “Transmission Operator.”</u> |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number VAR-001-1 Voltage and Reactive Control | | | | | |
|--|---|--|--|--|---|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | | | | The Transmission Operator does not have formal policies and procedures for monitoring and controlling voltage and MVAR flows. | |
| Original R2 | The Transmission Operator acquired 95% but less than 100% of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions including the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits. | The Transmission Operator acquired 90% but less than 95% of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions including the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits. | The Transmission Operator acquired 85% but less than 90% of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions including the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits. | The Transmission Operator acquired less than 85% of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions including the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits. | |
| Revised R2 | The responsible entity did not acquire 5% or less of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions including the Transmission Operator's share of the reactive requirements of interconnecting | The responsible entity did not acquire more than 5% up to (and including) 10% of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions including the Transmission Operator's share of the reactive requirements of interconnecting | The responsible entity did not acquire more than 10% up to (and including) 15% of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions including the Transmission Operator's share of the reactive requirements of interconnecting | The responsible entity did not acquire more than 15% of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions including the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits. | Changed to express percentages in 5% increments to 15%. |

| Standard Number VAR-001-1 Voltage and Reactive Control | | | | | |
|--|--|--|--|--|---|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | transmission circuits. | transmission circuits. | transmission circuits. | | |
| Original R3 | N/A | N/A | N/A | The Transmission Operator did not specify criteria that exempts generators from compliance with the requirements defined in Requirement 4, and Requirement 6.1. to all of the parties involved. | |
| Revised R3 | N/A | N/A | N/A | The Transmission Operator did not specify criteria that exempted generators from compliance with the requirements defined in Requirement R4, and Requirement R6.1. | Corrected typographical error. – deleted the last part of the sentence. |
| Original R3.1 | The Transmission Operator maintain the list of generators in its area that are exempt from following a voltage or Reactive Power schedule but is missing one or more entities. The missing entities shall represent less than 25% of those eligible for the list | The Transmission Operator maintain the list of generators in its area that are exempt from following a voltage or Reactive Power schedule but is missing two or more entities. The missing entities shall represent less than 50% of those eligible for the list | The Transmission Operator maintain the list of generators in its area that are exempt from following a voltage or Reactive Power schedule but is missing three or more entities. The missing entities shall represent less than 75% of those eligible for the list | The Transmission Operator maintain the list of generators in its area that are exempt from following a voltage or Reactive Power schedule but is missing four or more entities. The missing entities shall represent 75% or more of those eligible for the list. | |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number VAR-001-1 Voltage and Reactive Control | | | | | |
|--|--|---|--|--|--|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| Revised R3.1 | The Transmission Operator maintained the list of generators in its area that are exempt from following a voltage or Reactive Power schedule but is missing one or more entities. The missing entities represented 5% or less of those eligible for the list. | The Transmission Operator maintained the list of generators in its area that are exempt from following a voltage or Reactive Power schedule but is missing two or more entities. The missing entities represented 10% or less but more than 5% up to (and including) 10% of those eligible for the list. | The Transmission Operator maintained the list of generators in its area that are exempt from following a voltage or Reactive Power schedule but is missing three or more entities. The missing entities represented 15% or less but more than 10% up to (and including) 15% of those eligible for the list. | The Transmission Operator maintained the list of generators in its area that are exempt from following a voltage or Reactive Power schedule but is missing four or more entities. The missing entities represented more than 15% of those eligible for the list. | Corrected typographical errors and changed percentages to 5%, 10%, 15%, range as directed by FERC. Modified % language for consistency between standards. |
| Original R3.2 | The Transmission Operator failed to notify up to 25% of the associated Generator Owner of each generator that are on this exemption list. | The Transmission Operator failed to notify 25% up to 50% of the associated Generator Owner of each generator that are on this exemption list. | The Transmission Operator failed to notify 50% up to 75% of the associated Generator Owner of each generator that are on this exemption list. | The Transmission Operator failed to notify 75% up to 100% of the associated Generator Owner of each generator that are on this exemption list. | |
| Revised R3.2 | The Transmission Operator failed to notify up to 5% or less of the Generator Owners associated with a generator on the exemption list specified in R3.1. | The Transmission Operator failed to notify more than 5% up to (and including) 10% of the Generator Owners associated with a generator on the exemption list specified in R3.1. | The Transmission Operator failed to notify <u>more than</u> 10% up to (and including) 15% of the Generator Owners associated with a generator on the exemption list specified in R3.1. | The Transmission Operator failed to notify more than 15% of the Generator Owners associated with a generator on the exemption list specified in R3.1. | Corrected grammar and clarified wording and used 5% to 15% range per FERC direction. Modified % language for consistency between standards. |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number VAR-001-1 Voltage and Reactive Control | | | | | |
|--|---|---|--|--|--|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| Original R4 | N/A | N/A | The Transmission Operator provide Voltage or Reactive Power schedules were for some but not all generating units as required in R4. | The Transmission Operator provide No evidence that voltage or Reactive Power schedules were provided to Generator Operators as required in R4. | |
| Revised R4 | The Transmission Operator failed to direct the Generator Operator to comply with the Voltage or Reactive Power schedules for 5% or less of the generating units as required in R4. N/A | The Transmission Operator failed to direct the Generator Operator to comply with the Voltage or Reactive Power schedules for more than 5% up to (and including) 10% of the generating units as required in R4. N/A | The Transmission Operator failed to direct the Generator Operator to comply with the Voltage or Reactive Power schedules for more than 10% up to (and including) 15% of the generating units as required in R4. The Transmission Operator provided Voltage or Reactive Power schedules for some but not all generating units as required in R4. | The Transmission Operator failed to direct the Generator Operator to comply with the Voltage or Reactive Power schedules for more than 15% of the generating units as required in R4. The Transmission Operator provided no evidence that voltage or Reactive Power schedules were provided to Generator Operators as required in R4. | Corrected grammar. Added VSLs based on the number of generating units reactive power of voltage schedules were provided to. |
| Original R5 | The Purchasing-Selling Entity failed to arrange reactive resources for 1% to 5% of its reactive requirements identified by its Transmission Service Provider | The Purchasing-Selling Entity failed to arrange reactive resources for 6% to 10% of its reactive requirements identified by its Transmission Service Provider | The Purchasing-Selling Entity failed to arrange reactive resources for 11% to 15% of its reactive requirements identified by its Transmission Service Provider | The Purchasing-Selling Entity failed to arrange reactive resources for more than 15% of its reactive requirements identified by its Transmission Service Provider | |
| Revised R5 | The responsible entity did not arrange for reactive resources, as directed by | The responsible entity did not arrange for reactive resources, as directed by | The responsible entity did not arrange for reactive resources, as directed by | The responsible entity did not arrange for reactive resources, as directed by | Revised to use the FERC specific language. Modified % language for |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number VAR-001-1 Voltage and Reactive Control | | | | | |
|--|---|---|---|---|--|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | the requirement, affecting 5% or less of its reactive requirements. | the requirement, affecting <u>more than 5% up to (and including) 10%</u> between 5-10% of its reactive requirements. | the requirement, affecting <u>more than 10% up to (and including) 15%</u> 10-15%, inclusive, of its reactive requirements. | the requirement, affecting greater <u>more than 15%</u> of its reactive requirements. | consistency between standards. |
| Original R6 | N/A | N/A | N/A | The Transmission Operator did not know the status of all transmission Reactive Power resources, including the status of voltage regulators and power system stabilizers. | |
| Revised R6 | The responsible entity <u>Transmission Operator</u> did not know the status of all transmission reactive power resources, including the status of voltage regulators and power system stabilizers, as directed by the requirement, affecting 5% or less of the required resources. | The <u>Transmission Operator</u> responsible entity did not know the status of all transmission reactive power resources, including the status of voltage regulators and power system stabilizers, as directed by the requirement, affecting <u>more than 5% up to (and including) 10%</u> between 5-10% of the required resources. | The <u>Transmission Operator</u> responsible entity did not know the status of all transmission reactive power resources, including the status of voltage regulators and power system stabilizers, as directed by the requirement, affecting <u>more than 10% up to (and including) 15%</u> 10-15%, inclusive, of the required resources. | The <u>Transmission Operator</u> responsible entity did not know the status of all transmission reactive power resources, including the status of voltage regulators and power system stabilizers, as directed by the requirement, affecting <u>more than 15%</u> or greater of required resources. | Revised to use the FERC specific language Modified % language for consistency between standards. |
| Original R6.1 | N/A | N/A | N/A | The Transmission Operator has not provided evidence to show that directives were issued to the Generator Operator to maintain or | |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number VAR-001-1 Voltage and Reactive Control | | | | | |
|--|---|--|---|---|---|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | | | | change either its voltage schedule or its Reactive Power schedule in accordance with R6.1. | |
| Revised R6.1 | N/A | N/A | N/A | The Transmission Operator has not provided evidence to show that directives were issued to the Generator Operator to maintain or change either its voltage schedule or its Reactive Power schedule in accordance with R6.1. | No changes. |
| Original R7 | The Transmission Operator was unable to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow less than 25% of the time.. | The Transmission Operator was unable to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow less than 50% of the time but more than or equal to 25% of the time. | The Transmission Operator was unable to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow less than 75% of the time but more than or equal to 50% of the time. | The Transmission Operator was unable to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow more than 75% of the time. | |
| Revised R7 | The Transmission Operator <u>responsible entity</u> was not able to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow, affecting | The Transmission Operator <u>responsible entity</u> was not able to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow, affecting <u>more than 5% up to (and</u> | The Transmission Operator <u>responsible entity</u> was not able to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow, affecting <u>more than 10% up to (and</u> | The Transmission Operator <u>responsible entity</u> was not able to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow, affecting <u>greater more than 15% of</u> | Accepted FERC language. Changed to “responsible entity.” Changed “responsible entity” to “Transmission Operator”. Modified % language for |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number VAR-001-1 Voltage and Reactive Control | | | | | |
|--|---|---|---|---|--|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | 5% or less of the required devices. | including) 10% between 5-10% of the required devices. | including) 15% 10-15%, inclusive, of the required devices. | the required devices. | consistency between standards. |
| Original R8 | The Transmission Operator failed to operate or direct the operation of capacitive and inductive reactive resources within its area – including reactive generation scheduling; transmission line and reactive resource switching; and, if necessary, load shedding – to maintain system and Interconnection voltages within established limits less than 25% of the time. | The Transmission Operator failed to operate or direct the operation of capacitive and inductive reactive resources within its area – including reactive generation scheduling; transmission line and reactive resource switching; and, if necessary, load shedding – to maintain system and Interconnection voltages within established limits less than 50% of the time but more than or equal to 25% of the time. | The Transmission Operator failed to operate or direct the operation of capacitive and inductive reactive resources within its area – including reactive generation scheduling; transmission line and reactive resource switching; and, if necessary, load shedding – to maintain system and Interconnection voltages within established limits less than 75% of the time but more than or equal to 50% of the time. | The Transmission Operator failed to operate or direct the operation of capacitive and inductive reactive resources within its area – including reactive generation scheduling; transmission line and reactive resource switching; and, if necessary, load shedding – to maintain system and Interconnection voltages within established limits more than 75% of the time. | |
| Revised R8 | The responsible entity Transmission Operator did not operate or direct the operation of capacitive and inductive reactive resources or load shedding within its area, as directed by the requirement, affecting 5% or less of the required resources. | The Transmission Operator responsible entity did not operate or direct the operation of capacitive and inductive reactive resources or load shedding within its area, as directed by the requirement, affecting more than 5% up to (and including) 10% between 5-10% of the required | The Transmission Operator responsible entity did not operate or direct the operation of capacitive and inductive reactive resources or load shedding within its area, as directed by the requirement, more than 15% affecting 10-15%, inclusive, of the required | The Transmission Operator responsible entity did not operate or direct the operation of capacitive and inductive reactive resources or load shedding within its area, as directed by the requirement, affecting greater more than 15% of the required resources. | Revised to use the FERC specific language. Modified % language for consistency between standards. |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number VAR-001-1 Voltage and Reactive Control | | | | | |
|--|--|--|---|--|--|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | | resources. | resources. | | |
| Original R9 | The Transmission Operator maintains 95% or more of the reactive resources needed to support its voltage under first Contingency conditions. | The Transmission Operator maintains 85% or more but less than 95% of the reactive resources needed to support its voltage under first Contingency conditions. | The Transmission Operator maintains 75% or more but less than 85% of the reactive resources needed to support its voltage under first Contingency conditions. | The Transmission Operator maintains less than 75% of the reactive resources needed to support its voltage under first Contingency conditions. | |
| Revised R9 | The Transmission Operator responsible entity did not maintain 5% or less of the reactive resources needed to support its voltage under first Contingency conditions. | The Transmission Operator responsible entity did not maintain more than 5% up to (and including) 10% more than 5% but less than 10% of the reactive resources needed to support its voltage under first Contingency conditions. | The Transmission Operator responsible entity did not maintain more than 10% up to (and including) 15% 10% to 15% of the reactive resources needed to support its voltage under first Contingency conditions. | The Transmission Operator responsible entity did not maintain more than 15% of the reactive resources needed to support its voltage under first Contingency conditions. | Revised percentages to lower values to be consistent with the FERC language suggested in R9.1. <u>Changed “responsible entity” to “Transmission Operator.”</u> <u>Modified % language for consistency between standards.</u> |
| Original R9.1 | The Transmission Operator has dispersed and located 95% or more of the reactive resources so that the resources can be applied effectively and quickly when Contingencies occur. | The Transmission Operator has dispersed and located 85% or more but less than 95% of the reactive resources so that the resources can be applied effectively and quickly when Contingencies occur. | The Transmission Operator has dispersed and located 75% or more but less than 85% of the reactive resources so that the resources can be applied effectively and quickly when Contingencies occur. | The Transmission Operator has dispersed and located less than 75% of the reactive resources so that the resources can be applied effectively and quickly when Contingencies occur. | |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number VAR-001-1 Voltage and Reactive Control | | | | | |
|--|---|---|---|---|--|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| Revised R9.1 | The responsible entity <u>Transmission Operator</u> did not disperse and/or locate the reactive resources, as directed in the requirement, affecting 5% or less of the resources. | The responsible entity <u>Transmission Operator</u> did not disperse and/or locate the reactive resources, as directed in the requirement, affecting <u>more than 5% up to (and including) 10%</u> more than 5% but less than 10% of the resources. | The responsible entity <u>Transmission Operator</u> did not disperse and/or locate the reactive resources, as directed in the requirement, affecting <u>more than 10% up to (and including) 15%</u> 10% to 15%, inclusive, of the resources. | The responsible entity <u>Transmission Operator</u> did not disperse and/or locate the reactive resources, as directed in the requirement, affecting <u>greater more than 15%</u> of the resources. | Used the FERC specific language changes. <u>Changed “responsible entity” to “Transmission Operator.”</u> <u>Modified % language for consistency between standards.</u> |
| Original R10 | The Transmission Operator corrected the IROL or SOL violations resulting from reactive resource deficiencies and completed the required IROL or SOL violation reporting within the specified time as specified in R10 for 95% or more of the occurrences. | The Transmission Operator corrected the IROL or SOL violations resulting from reactive resource deficiencies and completed the required IROL or SOL violation reporting within the specified time as specified in R10 for 90% or more but less than 95% of the occurrences. | The Transmission Operator corrected the IROL or SOL violations resulting from reactive resource deficiencies and completed the required IROL or SOL violation reporting within the specified time as specified in R10 for 85% or more but less than 90% of the occurrences. | The Transmission Operator corrected the IROL or SOL violations resulting from reactive resource deficiencies and completed the required IROL or SOL violation reporting within the specified time as specified in R10 for less than 85% of the occurrences. | |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number VAR-001-1 Voltage and Reactive Control | | | | | |
|--|--|--|---|---|---|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| Revised R10 | The Transmission Operator did not correct the IROL or SOL violations resulting from reactive resource deficiencies and completed the required IROL or SOL violation reporting within the specified time as specified in R10 for 5% or less 95% or more of the <u>applicable</u> occurrences. | The Transmission Operator did not correct the IROL or SOL violations resulting from reactive resource deficiencies and completed the required IROL or SOL violation reporting within the specified time as specified in R10 for more than 5% up to (and including) 10% 90% or more but less than 95% of the <u>applicable</u> occurrences. | The Transmission Operator did not correct the IROL or SOL violations resulting from reactive resource deficiencies and completed the required IROL or SOL violation reporting within the specified time as specified in R10 for more than 10% up to (and including) 15% 85% or more but less than 90% of the <u>applicable</u> occurrences. | The Transmission Operator did not correct the IROL or SOL violations resulting from reactive resource deficiencies and completed the required IROL or SOL violation reporting within the specified time as specified in R10 for less than 85% of the more than 15% of the applicable occurrences. | No changes <u>Conforming changes made to reflect failure to meet the requirement.</u> |
| Original R11 | The Transmission Operator provided documentation to the Generator Owner specifying required step-up transformer tap changes and a timeframe for making these changes, but failed to provide technical justification for these changes. | The Transmission Operator provided documentation to the Generator Owner specifying required step-up transformer tap changes, but failed to provide a timeframe for making these changes and technical justification for these changes. | The Transmission Operator failed to provide documentation to the Generator Owner specifying required step-up transformer tap changes, a timeframe for making these changes, and technical justification for these changes. | N/A | |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number VAR-001-1 Voltage and Reactive Control | | | | | |
|--|-----------|--|--|--|---|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| Revised R11 | N/A | The Transmission Operator provided documentation to the Generator Owner specifying required step-up transformer tap changes and a timeframe for making these changes, but failed to provide technical justification for these changes. | The Transmission Operator provided documentation to the Generator Owner specifying required step-up transformer tap changes, but failed to provide a timeframe for making these changes and technical justification for these changes. | The Transmission Operator failed to provide documentation to the Generator Owner specifying required step-up transformer tap changes, a timeframe for making these changes, and technical justification for these changes. | Moved VSLs up one level, with no Lower VSL. |
| Original R12 | N/A | N/A | N/A | The Transmission Operator has failed to direct corrective action, including load reduction, necessary to prevent voltage collapse when reactive resources are insufficient. | |
| Revised R12 | N/A | N/A | N/A | The Transmission Operator has failed to direct corrective action, including load reduction, necessary to prevent voltage collapse when reactive resources are insufficient. | No changes. |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number VAR-002-1 Generator Operations for Maintaining Network Voltage Schedules | | | | | |
|--|--|--|--|---|--|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| Original R1 | The Generator Operator failed to notify the Transmission Operator as identified in R1 for less than 25% of its generators.. | The Generator Operator failed to notify the Transmission Operator as identified in R1 for 25% or more but less than 50% of its generators.. | The Generator Operator failed to notify the Transmission Operator as identified in R1 for 50% or more but less than 75% of its generators.. | The Generator Operator failed to notify the Transmission Operator as identified in R1 for 75% or more of its generators.. | |
| Revised R1 | N/A | N/A | N/A | The responsible entity did not operate each generator in the automatic voltage control mode and failed to notify the Transmission Operator as identified in R1. | Changed to Binary - Severe level only |
| Original R2 | The Generator Operator failed to maintain a voltage or reactive power schedule for less than 25% of its generators.. | The Generator Operator failed to maintain a voltage or reactive power schedule for 25% or more but less than 50% of its generators.. | The Generator Operator failed to maintain a voltage or reactive power schedule for 50% or more but less than 75% of its generators.. | The Generator Operator failed to maintain a voltage or reactive power schedule for 75% or more of its generators.. | |
| Revised R2 | When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator Operator failed to meet the directed values by 5% or less. When directed by the Transmission Operator to maintain the generator voltage or reactive power output the applicable | When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator Operator failed to meet the directed values by more than 5% up to (and including) 10% OR When a generator's | When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator Operator failed to meet the directed values by more than 10% up to (and including) 15% When directed by the Transmission Operator to maintain the generator | When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator Operator failed to meet the directed values by more than 15% . OR When a generator's automatic voltage regulator | Changed using 5% to 15% as suggested by FERC <u>Applied roll-up of sub-requirements</u> |

| Standard Number VAR-002-1 Generator Operations for Maintaining Network Voltage Schedules | | | | | |
|--|--|--|---|--|-----------------------|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | entity failed to meet the directed values by 5% or less. | <u>automatic voltage regulator is out of service, the Generator Operator failed to use an alternative method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule directed by the Transmission Operator.</u> <u>OR</u> <u>The Generator Operator failed to provide an explanation of why the voltage schedule could not be met.</u> When directed by the Transmission Operator to maintain the generator voltage or reactive power output the applicable entity failed to meet the directed values by more than 5% but less than 10% | voltage or reactive power output the applicable entity failed to meet the directed values by more than 10% but less than 15% | <u>is out of service, the Generator Operator failed to use an alternative method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule directed by the Transmission Operator and the Generator Operator failed to provide an explanation of why the voltage schedule could not be met.</u> When directed by the Transmission Operator to maintain the generator voltage or reactive power output the applicable entity failed to meet the directed values by 15% or more. | |
| Original R2.1 | The Generator Operator failed to use an alternate method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule for less than 25% of its generators.. | The Generator Operator failed to use an alternate method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule for 25% or more but less than 50% of its | The Generator Operator failed to use an alternate method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule for 50% or more but less than 75% of its | The Generator Operator failed to use an alternate method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule for 75% or more of its generators.. | |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number VAR-002-1 Generator Operations for Maintaining Network Voltage Schedules | | | | | |
|--|---|--|--|--|--|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | | generators.. | generators.. | | |
| Revised R2.1 | N/A | N/A | N/A | The responsible entity failed to use an alternative method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule directed by the Transmission Operator. N/A | Changed to Binary—Severe level only. Use of roll-up to primary requirement. |
| Original R2.2 | The Generator Operator failed to comply with required voltage modifications or provide an explanation of why the modifications could not be met less the 25% of the time. | The Generator Operator failed to comply with required voltage modifications or provide an explanation of why the modifications could not be met less than 50% of the time but more than or equal to 25% of the time. | The Generator Operator failed to comply with required voltage modifications or provide an explanation of why the modifications could not be met less than 75% of the time but more than or equal to 50% of the time. | The Generator Operator failed to comply with required voltage modifications or provide an explanation of why the modifications could not be met more than 75% of the time. | |
| Revised R2.2 | N/A- | N/A | N/A- | N/A The responsible entity failed to modify voltage as directed. OR The responsible entity failed to provide an explanation of why the schedule could not be met. | Use of roll-up to primary requirement. Changed to Binary—Severe level only. |

Proposed Violation Severity Levels for the CIP, COM and VAR Series of Standards

| Standard Number VAR-002-1 Generator Operations for Maintaining Network Voltage Schedules | | | | | |
|--|--|---|---|--|---|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| Original R3 | The Generator Operator had one incident of failing to notify the Transmission Operator as identified in R3. | The Generator Operator had more than one but less than five incidents of failing to notify the Transmission as identified in R3.1 R3.2. | The Generator Operator had more than five but less than ten incidents of failing to notify the Transmission Operator as identified in R3.1 R3.2 | The Generator Operator had ten or more incidents of failing to notify the Transmission Operator as identified in R3.1 R3.2. | |
| Revised R3 | N/A | N/A | The Generator Operator failed to notify the Transmission Operator within 30 minutes <u>of</u> the information as specified in either R3.1 or R3.2 | The Generator Operator failed to notify the Transmission Operator within 30 minutes <u>of</u> the information as specified in both R3.1 and R3.2 | Changed to remove the multiple occurrences and rolled up since subrequirements are explanatory text. Minor word change for clarity. |
| Original R3.1 | The Generator Operator failed to notify the Transmission Operator of a status or capability change on any generator Reactive Power resource, including the status of each automatic voltage regulator and power system stabilizer and the expected duration of the change in status or capability. | N/A | N/A | N/A | |
| Revised R3.1 | N/A | N/A | N/A | N/A | Rolled up into R3. |
| Original R3.2 | The Generator Operator failed to notify the Transmission Operator of | N/A | N/A | N/A | |

| Standard Number VAR-002-1 Generator Operations for Maintaining Network Voltage Schedules | | | | | |
|--|---|--|--|---|---|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | a status or capability change on any other Reactive Power resources under the Generator Operator’s control and the expected duration of the change in status or capability.. | | | | |
| Revised R3.2 | N/A | N/A | N/A | N/A | Rolled up into R3. |
| Original R4 | The Generator Owner had one (1) incident of failing to notify its associated Transmission Operator and Transmission Planner within 30 calendar days of a request for information, as described in R4.1.1 through R4.1.4, regarding generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage. | The Generator Owner had more than one (1) incident but less than five (5) incidents of failing to notify its associated Transmission Operator and Transmission Planner within 30 calendar days of a request for information, as described in R4.1.1 through R4.1.4, regarding generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage. | The Generator Owner had more than five (5) incidents but less than ten (10) incidents of failing to notify its associated Transmission Operator and Transmission Planner within 30 calendar days of a request for information, as described in R4.1.1 through R4.1.4, regarding generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage. | The Generator Owner had more than ten (10) incidents of failing to notify its associated Transmission Operator and Transmission Planner within 30 calendar days of a request for information, as described in R4.1.1 through R4.1.4, regarding generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage. | |
| Revised R4 | The Responsible entity failed to provide to its associated Transmission Operator and transmission | The Responsible entity failed to provide to its associated Transmission Operator and Transmission | The Responsible entity failed to provide to its associated Transmission Operator and Transmission | The Responsible entity failed to provide to its associated Transmission Operator and Transmission | Eliminated number of occurrences as per FERC guidelines and rolled up sub-requirements. |

| Standard Number VAR-002-1 Generator Operations for Maintaining Network Voltage Schedules | | | | | |
|--|--|--|--|--|---|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | <p>Transmission planner <u>Planner</u> one of the types of data as specified in R4.1.1 or R 4.1.2 or 4.1.3 or 4.1.4 OR The information was provided in more than 30 but less than or equal to 35 calendar days of the request.</p> | <p>Planner two of the types of data as specified in R4.1.1 or R 4.1.2 or 4.1.3 or 4.1.4 OR The information was provided in more than 35 but less than or equal to 40 calendar days of the request.</p> | <p>Planner three of the types of data as specified in R4.1.1 or R 4.1.2 or 4.1.3 or 4.1.4 OR The information was provided in more than 40 but less than or equal to 45 calendar days of the request.</p> | <p>Planner any of the types of data as specified in R4.1.1 and R 4.1.2 and 4.1.3 and 4.1.4 OR The information was provided in more than 45 calendar days of the request.</p> | <p><u>Capitalized “Transmission Planner.”</u></p> |
| Original R4.1.1 | The Generator Owner failed to notify its associated Transmission Operator and Transmission Planner within 30 calendar days of a request for tap settings on generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage. | N/A | N/A | N/A | |
| Revised R4.1.1 | N/A | N/A | N/A | N/A | Rolled up into R4. |
| Original R4.1.2 | The Generator Owner failed to notify its associated Transmission Operator and | N/A | N/A | N/A | |

| Standard Number VAR-002-1 Generator Operations for Maintaining Network Voltage Schedules | | | | | |
|--|--|--------------|----------|------------|-----------------------|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | Transmission Planner within 30 calendar days of a request for available fixed tap ranges on generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage. | | | | |
| Revised R4.1.2 | N/A | N/A | N/A | N/A | Rolled up into R4. |
| Original R4.1.3 | The Generator Owner failed to notify its associated Transmission Operator and Transmission Planner within 30 calendar days of a request for impedance data on generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage. | N/A | N/A | N/A | |
| Revised R4.1.3 | N/A | N/A | N/A | N/A | Rolled up into R4. |
| Original R4.1.4 | The Generator Owner failed to notify its associated Transmission | N/A | N/A | N/A | |

| Standard Number VAR-002-1 Generator Operations for Maintaining Network Voltage Schedules | | | | | |
|--|--|--|---|---|-----------------------|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | Operator and Transmission Planner within 30 calendar days of a request for the +/- voltage range with tap change in percent (%) for load-tap changing transformers on generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage. | | | | |
| Revised R4.1.4 | N/A | N/A | N/A | N/A | Rolled up into R4. |
| Original R5 | The Generator Owner had one (1) incident of failing to change the step-up transformer tap settings in accordance with the specifications provided by the Transmission Operator when said actions would not have violated safety, an equipment rating, a regulatory requirement, or a statutory requirement. | The Generator Owner had more than one (1) incident but less than or equal to five (5) incidents of failing to change the step-up transformer tap settings in accordance with the specifications provided by the Transmission Operator when said actions would not have violated safety, an equipment rating, a regulatory requirement, or a statutory requirement. | The Generator Owner had more than five (5) incident but less than or equal to ten (10) incidents of failing to change the step-up transformer tap settings in accordance with the specifications provided by the Transmission Operator when said actions would not have violated safety, an equipment rating, a regulatory requirement, or a statutory requirement. | The Generator Owner had more than ten (10) incidents of failing to change the step-up transformer tap settings in accordance with the specifications provided by the Transmission Operator when said actions would not have violated safety, an equipment rating, a regulatory requirement, or a statutory requirement. | |

| Standard Number VAR-002-1 Generator Operations for Maintaining Network Voltage Schedules | | | | | |
|--|--|---|--|--|--|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| Revised R5 | N/A | N/A | N/A | <u>The responsible entity failed to ensure that transformer tap positions were changed according to the specifications provided by the Transmission Operator when said actions would not have violated safety, an equipment rating, a regulatory requirement, or a statutory requirement.</u> The responsible entity failed to ensure that transformer tap positions were changed according to the specifications provided by the Transmission Operator. | Eliminated number of occurrences per FERC guidelines- became binary. Added language to better align with the requirement. |
| Original R5.1 | The Generator Operator had one (1) incident of failing to notify and provide technical justification to the Transmission Operator concerning non-compliance with Transmission Operator's specifications. | The Generator Operator had more than one (1) incident but less than or equal to five (5) incidents of failing to notify and provide technical justification to the Transmission Operator concerning non-compliance with Transmission Operator's specifications. | The Generator Operator had more than five (5) incident but less than or equal to ten (10) incidents of failing to notify and provide technical justification to the Transmission Operator concerning non-compliance with Transmission Operator's specifications. | The Generator Operator had more than ten (10) incidents of failing to notify and provide technical justification to the Transmission Operator concerning non-compliance with Transmission Operator's specifications. | |
| Revised R5.1 | N/A | N/A | N/A | The responsible entity failed to notify the Transmission Operator and to provide | Eliminated number of occurrences per FERC |

| Standard Number VAR-002-1 Generator Operations for Maintaining Network Voltage Schedules | | | | | |
|--|-----------|--------------|----------|--------------------------|---|
| R# | Lower VSL | Moderate VSL | High VSL | Severe VSL | Explanation of Change |
| | | | | technical justification. | guidelines- became binary. <u>Spelled out name of functional entity.</u> |