

Consideration of Comments on Violation Severity Level Development Guidelines Criteria and Initial Set of Proposed VSLs

The Violation Severity Levels drafting team (VSL DT) thanks all those who submitted comments on the first draft of the Violation Severity Levels (VSLs) and VSL Development Guidelines. The draft VSL and VSL Development Guidelines were posted for a 45-day public comment period from October 10 through November 27, 2007. The VSL DT asked stakeholders to provide feedback on these documents through a special Comment Form. There were 37 sets of comments received, including comments from more than 160 different individuals from about 40 organizations representing 9 of the 10 Industry Segments as shown in the table on the following pages.

The majority of comments received focused on the use of the terms "minor elements" or "significant elements" in the draft VSLs. The VSL DT originally used these terms in the draft VSL Development Guidelines and VSLs to provide guidance to the standard drafting teams working on the specific standards. The VSL DT did not envision that these terms would be used in actual VSLs. Based on stakeholder comments, the drafting team revised all the generic VSLs to make them requirement-specific.

In addition a number of comments received questioned the use of the term "Explanatory Test" when categorizing requirements and the drafting team eliminated this category from the revised VSL Guidelines. The VSL DT revised the draft VSL Development Guidelines and VSLs to reflect the comments and feedback from stakeholders.

The VSL DT now recommends that the revised VSLs be posted for a 30-day pre-ballot period followed by a ballot of the VSLs.

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

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

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The Industry Segments are:

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

	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
1.	Mike Hall (G10)	ACES Power Marketing						✓						
2.	Anita Lee (G3)	AESO		✓										
3.	Bruce Fauvelle (G15)	AESO		✓										
4.	Ken Goldsmith (G5)	ALTW	✓											
5.	Kirit Shah (G18)	Ameren	✓											
6.	Rick Roster (G8)	Ameren	✓											
7.	John Sullivan (G9)	Ameren	✓											
8.	Curt Stepanek (G11)	Ameren	✓											
9.	Robert Ferguson	Ameren (2)						✓						
10.	John E. Sullivan	Ameren Corp. (1)	✓											
11.	Thad K. Ness	American Electric Power (AEP)	✓		✓			✓	✓					
12.	Jason Shaver	American Transmission Co. (ATC)	✓											
13.	Warren Maxvill (G15)	AVA												
14.	Crystal Musselman	Avista Corp.	✓		✓	✓	✓	✓	✓					
15.	Rod Byrnell (G15)	BCTC												
16.	Dave Rudolph (G5)	BEPC	✓		✓			✓	✓					
17.	Brian Tuck (G15)	BPA												
18.	Jamie Murphy (G16)	BPAT												
19.	Phil Park	British Columbia Transmission Corp. (BCTC)		✓										
20.	Brent Kingsford (G3)	CAISO		✓										
21.	Eric Hudson (G15)	CAISO		✓										
22.	Clyde Loutan	CAISO		✓										

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	(G16)												
23.	Lisa James	Public Utility District #1 of Chelan County			✓		✓	✓					
24.	Alisha Anker (G10)	City of Springfield, IL CWLP	✓		✓		✓						
25.	Karol Kohlrus (G10)	City of Springfield, IL CWLP	✓		✓		✓						
26.	Danny McDaniel (G14)	CLECO	✓		✓		✓						
27.	Greg Tillitson (G17)	CMRC											✓
28.	Paul Morland (G16)	CSU	✓										
29.	Jalil Babik (G1)	Dominion					✓						
30.	Louis Slade (G1)	Dominion					✓						
31.	Harold Adams (G1)	Dominion					✓						
32.	Ronald Hart (G1)	Dominion					✓						
33.	Jack Kerr (G10)	Dominion Virginia Power	✓										
34.	Hank LaBean (G15)	DOPD											
35.	Anthony Williams (G8)	Duke Energy Carolinas	✓										
36.	Brian Moss (G11)	Duke Energy Carolinas	✓										
37.	Gregory Mason (G10) (G18)	Dynegy					✓						
38.	Brian Berkstresser (G14)	EDE	✓		✓		✓						
39.	Charles Long (G9)	Entergy Services, Inc.	✓										
40.	Edward J. Davis (1)	Entergy Services, Inc.	✓										
41.	Will Franklin (2)	Entergy Services, Inc.						✓					
42.	Sharma Kolluri (G8)	Entergy Services, Inc.	✓										
43.	Sujit Mandal (G8)	Entergy Services, Inc.	✓										
44.	Jim Case (G10)	Entergy Services, Inc.	✓		✓		✓						
45.	Steve Myers (G3)	ERCOT		✓									
46.	Chris Scanlon	Exelon Corp.	✓		✓		✓	✓					
47.	Will Ciccone (G2)	FirstEnergy Corp.	✓		✓		✓	✓					
48.	Rob Martinko (G2)	FirstEnergy Corp.	✓		✓		✓	✓					
49.	Doug Hohlbaugh (G2)	FirstEnergy Corp.	✓		✓		✓	✓					
50.	John Reed (G2)	FirstEnergy Corp.	✓		✓		✓	✓					
51.	Ken Dresner (G2)	FirstEnergy Corp.	✓		✓		✓	✓					
52.	Bill Duge (G2)	FirstEnergy Corp.	✓		✓		✓	✓					
53.	Morgan Parke (G2)	FirstEnergy Corp.	✓		✓		✓	✓					

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54.	Larry Hartley (G2)	FirstEnergy Corp.	✓		✓		✓	✓				
55.	Henry Stevens (G2)	FirstEnergy Corp.	✓		✓		✓	✓				
56.	Jeff Mackauer (G2)	FirstEnergy Corp.	✓		✓		✓	✓				
57.	Wayne Porciau (G10)	Georgia System Operations	✓		✓		✓					
58.	Ken Wofford (G11)	Georgia Transmission Corp.	✓									
59.	Alessia Dawes (G3)	Hydro One Networks, Inc.	✓		✓							
60.	Ron Ralsetti (G3)	IESO			✓							
61.	Matt Goldberg (G3)	ISONE			✓							
62.	Virginia Cook	Jacksonville Electric Authority (JEA)	✓		✓		✓					
63.	Jim Cyrulewski (G18)	JDRJC Associates					✓					
64.	Chris Standifer (G4)	Kansas City Power & Light Co.	✓									
65.	Tim Kinken (G4)	Kansas City Power & Light Co.	✓									
66.	Eli Forney (G4)	Kansas City Power & Light Co.	✓									
67.	Joe Doetzi (G4)	Kansas City Power & Light Co.	✓									
68.	Jim Useldinger (G4)	Kansas City Power & Light Co.	✓									
69.	Harold Wyble (G4)	Kansas City Power & Light Co.	✓									
70.	Todd Fridley (G4)	Kansas City Power & Light Co.	✓									
71.	Kevin Wempe (G4)	Kansas City Power & Light Co.	✓									
72.	Michael Gammon (G4) (G14)	Kansas City Power & Light Co.	✓									
73.	Jason Atwood (G14)	Kelson Energy					✓	✓				
74.	Perpetuo Tan (G16)	LADWP	✓									
75.	Eric Ruskamp (G5)	Lincoln Electric System						✓				
76.	Joseph DePoorter (G18)	Madison Gas and Electric Co.					✓					
77.	Craig McLean	Manitoba Hydro	✓		✓		✓	✓				
78.	David Weekley (G9)	MEAG Power	✓									
79.	Tom Mielnik (G5)	MEC			✓							
80.	Robert Coish (G5)	MHEB	✓		✓		✓	✓				
81.	Allen McKee (G9)	Midwest ISO			✓							

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82.	Jason L. Marshall (G18)	Midwest ISO		✓															
83.	William Phillips (G3)	Midwest ISO		✓															
84.	Terry Bilke (G5)	Midwest ISO		✓															
85.	Carol Gerou (G5)	MP	✓		✓			✓	✓										
86.	Michael Brytowski (G5)	MRO																	✓
87.	Joe O'Brien (G18)	NIPSCO	✓																
88.	Denise Roeder (I) (G11)	NC Municipal Power Agency (NCMPA)			✓														
89.	Rick White	Northeast Utilities (NU)	✓																
90.	Don Badley (G16)	NWPP																	
91.	Jim Castle (G3)	NYISO		✓															
92.	Don Hargrove (G14)	OKGE	✓		✓			✓											
93.	Pete Kuebeck (G14)	OKGE	✓		✓			✓											
94.	Ron Verraneault (G15)	PAC																	
95.	Lauri Jones (G15)	PG&E	✓																
96.	Alicia Daugherty (G3) (G6)	PJM Interconnection		✓															
97.	Joe Willson (G6)	PJM Interconnection		✓															
98.	Leanne Harrison (G6)	PJM Interconnection		✓															
99.	Richard Krajewski (G15)	PNM																	
100.	Dick Schwarz (G15)	PNSC																	
101.	Bill Roeder (G7)	PPL Eastern Fossil & Hydro						✓											
102.	Joe Kisela (G7)	PPL Eastern Fossil & Hydro						✓											
103.	Mark Hemibach (G7)	PPL EnergyPlus							✓										
104.	Jon Williamson (G7)	PPL EnergyPlus							✓										
105.	Annette M. Bannon (G7)	PPL Generation, LLC						✓	✓										
106.	Tom Olson (G7)	PPL Montana						✓											
107.	David Gladey (G7)	PPL Susquehanna						✓											
108.	John O'Connor (G8)	Progress Energy Carolinas	✓																
109.	Rick Brock (G15)	PSC																	
110.	Bob Johnson (G17)	PSC																	✓
111.	Randy Beckwith (G16)	PSCO																	

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112.	Sarah A. Majok	Sacramento Municipal Utility District (SMUD)	✓		✓		✓						
113.	Clay Young (G11)	SC Electric & Gas Company			✓								
114.	George Noller (G15)	SCE	✓										
115.	Pat Huntley (G8) (G9)	SERC Reliability Corp.											✓
116.	John Troha (G10)	SERC Reliability Corp.											✓
117.	Carter Edge (G11)	SERC Reliability Corp.											✓
118.	Jon Crook (G15)	Sacramento Municipal Utility District (SMUD)											
119.	Gene Delk (G10)	So. Carolina Electric & Gas	✓										
120.	John Rembold (G10)	So. Illinois Power Coop.	✓		✓	✓	✓						
121.	Steve McElhane (G10)	So. MS Electric Power Association	✓		✓		✓						
122.	Phil Kleckley (G9)	South Carolina Electric & Gas			✓								
123.	Joel Dison (G12)	Southern Company Generation	✓										
124.	Tom Higgins (G12)	Southern Company Generation	✓										
125.	T.L. Crawley (G12)	Southern Company Generation	✓										
126.	Mark Pratt (G12)	Southern Company Generation	✓										
127.	Rod Hardiman (G11)	Southern Company Services, Inc.	✓										
128.	James Y. Busbin (G13)	Southern Company Services, Inc.	✓										
129.	Marc Butts (G13)	Southern Company Services, Inc.	✓										
130.	J.T. Wood (G13)	Southern Company Services, Inc.	✓										
131.	Roman Carter (G13)	Southern Company Services, Inc.	✓										
132.	John Ciza (G12)	Southern Regulatory Affairs	✓										
133.	Bob Jones (G8) (G9)	Southern Transmission	✓										
134.	Lee Taylor (G8)	Southern Transmission	✓										
135.	Robert Rhodes (G14)	Southwest Power Pool			✓								
136.	Jason Smith (G14)	Southwest Power Pool			✓								
137.	Charles Yeung (G3)	Southwest Power Pool			✓								
138.	Kyle McMenamin (G14)	SPS	✓		✓		✓						

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139.	Bill Grant (G14)	SPS	✓		✓		✓						
140.	Tom Cain (G8)	Tennessee Valley Authority	✓										
141.	Robbie Bottoms (G8)	Tennessee Valley Authority	✓										
142.	Travis Sykes (G9)	Tennessee Valley Authority	✓										
143.	Larry Akens (G10)	Tennessee Valley Authority	✓		✓		✓					✓	
144.	Marjorie Parsons (G11)	Tennessee Valley Authority	✓										
145.	Ian Grant (G11)	Tennessee Valley Authority	✓										
146.	John Tolo (G16)	TEP	✓										
147.	Robert Eubank (G15)	TSGT											
148.	Michael Puscas	The United Illuminating Company	✓		✓								
149.	Raymond Vojdani (G16)	WACM											
150.	Nancy Bellows (G17)	WACM											✓
151.	Jim Haigh (G5)	WAPA										✓	
152.	Eric Langhorst (G15)	WECC											✓
153.	Ken Driggs (G15)	WECC											✓
154.	Anitha Neve (G16)	WECC											✓
155.	Linda Perez (G17)	WECC											✓
156.	Walley Gibson	WECC Loads and Resources Subc.											✓
157.	Allen Klassen (G14)	Westar Energy	✓		✓		✓						
158.	Steve Massey (G14)	Westar Energy					✓	✓					
159.	Bob Temple	Western Area Power Admin (WAPA)	✓										
160.	Barbara Kedrowski (G18)	Wisconsin Electric Power Company			✓	✓	✓						
161.	Neal Balu (G5)	WPS			✓		✓	✓					
162.	Pam Oreschnick (G5)	Xcel Energy	✓		✓		✓	✓					
163.	Jessica Collins (G14)	Xcel Energy	✓		✓		✓						

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- G1 – Dominion
- G2 – FirstEnergy Corp.
- G3 – ISO/RTO Council Standards Review Committee (IRC SRC)
- G4 – Kansas City Power & Light Co. (KCPL)
- G5 – Midwest Reliability Organization NSRS (MRO NSRS)
- G6 – PJM Interconnection (PJM)
- G7 – PPL Generation, LLC (PPL)
- G8 – SERC EC Dynamics Review Subcommittee (SERC EC DRS)
- G9 – SERC EC Planning Standards Subcommittee (SERC EC PSS)
- G10 – SERC OC Standards Review Group (SERC OC SRG)
- G11 – SERC Reliability Review Subcommittee (SERC RRS)
- G12 – Southern Company Services, Inc. Generation (SOCO Gen)
- G13 – Southern Company Services, Inc. Transmission (SOCO Trans)
- G14 – SPP Operating Reliability Working Group (SPP ORWG)
- G15 – WECC Operator Training Subcommittee (WECC OTS)
- G16 – WECC Performance Work Group (WECC PWG)
- G17 – WECC Reliability Coordination Comments Work Group (WECC RCCWG)
- G18 – Midwest ISO Stakeholders (MISO)

Index to Questions, Comments, and Responses

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1. Do you agree with the proposed criteria for assigning Violation Severity Levels as outlined in the Violation Severity Levels Development Guidelines?

Summary Consideration: Many comments that were received took issue with the use of the terms “minor elements” or “significant elements” of a requirement. The VSL DT used these terms in the draft VSL Development Guidelines in order to provide guidance to the standards drafting teams. The VSL DT did not envision that these terms would be used in VSLs during the on-going standards development process. The VSL DT feels that VSLs should be developed concurrent with requirements, Violation Risk Factors, and measurements and be performed all by the same team of experts. It is envisioned that future standard drafting teams will revise VSLs by specifically identifying the “minor” or “significant” elements for each requirement. The VSL DT has modified the VSL Development Guidelines to reflect this concept as follows:

The VSL DT used these criteria to apply VSLs to all the requirements in the 83 FERC-approved standards. The following generic criteria are being proposed as guidance for identifying the appropriate classification and the assignment of VSLs to each requirement. As standards are revised or created, generic terms such as “minor elements” and “significant elements” should be replaced by drafting teams with specific and measurable details in the actual VSL descriptions.

In addition, a number of comments received questioned the use of the term “Explanatory Text” when categorizing requirements. The VSL DT reviewed this category and removed it from the VSL Development Guidelines document. The requirements were assigned an existing category and specific VSLs were developed to reflect the comments and feedback from stakeholders.

The VSL DT also recognizes that measures are important in assessing compliance and that measures have not been developed for every requirement. It is outside the scope of the VSL DT to modify requirements or measures to address specific comments below.

Based on stakeholder comments, the generic table of VSLs for Coordination/Communication requirements was changed as shown below:

Lower	Moderate	High	Severe
The responsible entity's coordination/communication is non-compliant with respect to one or more minor details within the requirement.	The responsible entity's coordination/communication is non-compliant with respect to at least one significant element within the requirement.	The responsible entity's coordination/communication is non-compliant with respect to more than one significant element within the requirement.	The responsible entity's coordination/communication is non-compliant with most or all the elements of the requirement.

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Coordination/ Communication				
Company	Type of Requirement	Agree	Disagree	Comments
Ameren (2)	Coordination/ Communication		<input checked="" type="checkbox"/>	<p>The Violation Severity Level (VSL) definitions for the each level from lower to severe don't provide a fair process for assessment of the violations. The Violation Risk Factor Matrix does not provide a fair process for assessment of the violations. For example the VAR-02 standard requires compliance with a voltage schedule issued by the Transmission Operator without input from the Generator Operator (GOP). It does not require any justification from the Transmission Operator for the voltage schedule that is issued. The Transmission Operators have issued voltage schedules with non-compliance tolerances ranging from plus/minus 1/2 % to more than 2%. Therefore some GOP's are required to meet a voltage range of 25% of other GOP's. The VSL definitions and risk factors measure non-compliance and risk in terms of number of times the GOP is not meeting his TO's voltage schedule. The VSL definitions should provide a fair and consistent non-compliance definition for the VAR-02 and other standards. The VSL for VAR-02 should have specific voltage range tolerance for the VSL definition and risk factors.</p> <p>It is not fair or reasonable to assign the same Violation Severity Level (VSL) for a non-compliance for a Generator Operator (GOP) registered once for all of his generators as a GOP registered separately for each of his generators.</p>
<p>Response: The VSL DT thanks you for your comment. We feel that the issues you bring forward are issues with the requirements and/or the NERC entity registration process, not the VSL itself. It is outside the scope of the VSL DT to make any changes to requirements or to Violation Risk Factors.</p>				
Entergy (2)	Coordination/ Communication		<input checked="" type="checkbox"/>	<p>The terms "minor" and "significant" are subjective and can be widely interpreted by the entity and auditor.</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.</p>				

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FirstEnergy	Coordination/ Communication		<input checked="" type="checkbox"/>	For each category table under the heading of Severe, we disagree with the use of the term "all" as used in the generic definition of a guideline document. The definition under Severe currently reads "...is non-compliant with all elements of the requirement." We suggest a change to indicate "...is non-compliant with several significant elements of the requirement".
<p>Response: The VSL DT thanks you for your comment. The VSL DT agrees with your comment and has modified the guidelines document to reflect your concept. The Severe category was modified to "The responsible entity is non-compliant with most or all significant elements of the requirement."</p>				
JEA	Coordination/ Communication		<input checked="" type="checkbox"/>	May wish to also consider the importance of the communication, for example if an entity has to communicate with ten entities, non-coordination with 2 or 3 of them may have more impact than the others. The VSL should incent the entity to ensure that the most vital communications have been made.
<p>Response: The VSL DT thanks you for your comment. The suggestion that some entities "have more impact than the others" would mean that violations or non-communications in this case, by or to these entities would have greater impact on reliability – impact on reliability is measured by the Violation Risk Factor – therefore the standards would need to be written such that communications with the designated entities would have a higher VRF than other entities. In this requirement since there is only one VRF, it is the same for all entities. The VSL only measures how well the responsible entity has met the specifics of the requirement. Therefore communication with any and all entities is of equal importance.</p>				
Manitoba Hydro	Coordination/ Communication		<input checked="" type="checkbox"/>	The use of the terms minor and significant in VSL criteria definitions allows for too much latitude for penalty adjudicators. The VSL criteria definitions are too vague to ensure consistency across all the RROs for a similar infraction of non compliance? Definitions for the terms minor and significant are necessary. What VSL would be assessed for missing both a minor and a significant detail on the same requirement?
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. If a "minor" and a "significant" element are found to be in violation for the same requirement, the most significant VSL would be applied.</p>				
Manitoba Hydro	Coordination/ Communication		<input checked="" type="checkbox"/>	Please see Comment #1 in the Drafting Team's #2 question.
<p>Response: Please see our response to comment #1.</p>				

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MISO Stakeholders	Coordination/ Communication		<input checked="" type="checkbox"/>	What is considered a minor detail and what is considered a significant detail and who decides? We believe that the drafting team needs to expand upon the meaning of minor and significant. Further, these two words imply the relative importance placed elements within the requirement. Isn't this what the VRF is for?
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. The VRF identifies the risk to the interconnection for not meeting a requirement. The VSL identifies the degree to which an entity missed the requirement.</p>				
NCMPA	Coordination/ Communication		<input checked="" type="checkbox"/>	See above.
<p>Response: Please see our response above.</p>				
PJM	Coordination/ Communication		<input checked="" type="checkbox"/>	<p>The proposed VSL Guideline Document uses the terms "minor" details and "significant" elements. Recognizing that the Criteria Tables for each type of requirement category contain some additional descriptions of these terms, we believe that these terms should be better defined. We note that "minor details" in the criteria table attempts to more clearly define this term as a "minor administrative weakness" and "significant element" as "objectives, work specifications, practices, procedures, or specifications."</p> <p>Although it is most likely that consensus among all audit team members will provide some 'reasonable assurance' that a minor detail or significant element of a requirement or sub-requirement can be understood/recognized, we suggest the VSL team look at each of the examples you included and holistically capture the definition and any associated, more detailed clarifications of each VSL category in one place in the guideline document for easy reference by future drafting teams. This will also better capture the criteria for use by compliance staffs in assessing the appropriate VSL.</p> <p>Recognizing that there is no way around the use of judgment in determining the VSLs and distinguishment among threshold values, we recommend that NERC use and document actual, recognized, and/or sanctioned non-compliances on a precedent setting basis going forward (as the NRC does via their publication of semi-annual reports to the industry via publicly available information called NUREGs), and explicitly state in the Guidelines document that this developing, on-going criteria will be shared as the CMEP matures.</p>

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				The availability of such information would serve two important and valuable purposes; (1) it would provide the industry with some assurance that additional guidance and precedent would be forthcoming for everyone's use in better defining, understanding, and distinguishing findings of non-compliance among the VSL categories, and (2) allow for comparisons of non-compliances to help NERC assure consistency in how similar findings are being dispositioned.
Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. The VSL DT will forward your last comment (paragraph) on to NERC Compliance staff for their consideration.				
SMUD	Coordination/ Communication		<input checked="" type="checkbox"/>	In cases where the Lower VSL description isn't as explicit as the subsequent VSLs, we suggest that the applicability of a VSL be reconsidered.
Response: The VSL DT thanks you for your comment. The intent of actual VSL application is to be as explicit as possible and we have revised the guideline document to direct the Standards Drafting Teams to do so.				
SOCO Gen	Coordination/ Communication		<input checked="" type="checkbox"/>	See response to question 2 below.
Response: Please see response to question 2 below.				
WECC RCCWG	Coordination/ Communication		<input checked="" type="checkbox"/>	It is not clear what would constitute the differentiation between a "minor detail" and a "significant element" within a requirement. This differentiation should not be open to interpretation.
Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.				
Ameren (1)	Coordination/ Communication	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Although there is general agreement with the premise, there are concerns for consistency in determining which requirements are minor and which are significant.
Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the				

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standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.				
SOCO Trans	Coordination/ Communication	<input checked="" type="checkbox"/>		See Comment #1 at Question 4.
Response: Please see response to comment #1 at question 4.				
SPP ORWG	Coordination/ Communication	<input checked="" type="checkbox"/>		Again, the example VSLs do not match those given in the Mandatory Standards Requirements with VSL spreadsheet.
Response: The VSL DT thanks you for your comment. The examples in the guidelines are for illustrative purposes only. It is envisioned that Standards Drafting Teams (industry experts) will develop specific VSLs for each requirement that meet the intent of the guidelines during the Standards Development Process. The guidelines document has been revised to clarify this intent.				
NU	Coordination/ Communication	<input checked="" type="checkbox"/>		How are "minor details" and "significant elements" defined? In most cases these qualities need to be specifically defined for a given standard/requirement. Phrases such as significant elements, or missing elements, should identify what elements are being referred to. Levels of Non-Compliance did not contain this level of ambiguity and subjectivity.
Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.				
SERC EC DRS	Coordination/ Communication	<input checked="" type="checkbox"/>		
BCTC	Coordination/ Communication	<input checked="" type="checkbox"/>		

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Based on stakeholder comments, the generic table of VSLs for Explanatory requirements was deleted and the requirements that had been identified as 'explanatory' were moved into other categories.

Explanatory				
Company	Type of Requirement	Agree	Disagree	Comments
Ameren (2)	Explanatory		<input checked="" type="checkbox"/>	<p>The Violation Severity Level (VSL) definitions for the each level from lower to severe don't provide a fair process for assessment of the violations. The Violation Risk Factor Matrix does not provide a fair process for assessment of the violations. For example the VAR-02 standard requires compliance with a voltage schedule issued by the Transmission Operator without input from the Generator Operator (GOP). It does not require any justification from the Transmission Operator for the voltage schedule that is issued. The Transmission Operators have issued voltage schedules with non-compliance tolerances ranging from plus/minus 1/2 % to more than 2%. Therefore some GOP's are required to meet a voltage range of 25% of other GOP's. The VSL definitions and risk factors measure non-compliance and risk in terms of number of times the GOP is not meeting his TO's voltage schedule. The VSL definitions should provide a fair and consistent non-compliance definition for the VAR-02 and other standards. The VSL for VAR-02 should have specific voltage range tolerance for the VSL definition and risk factors.</p> <p>It is not fair or reasonable to assign the same Violation Severity Level (VSL) for a non-compliance for a Generator Operator (GOP) registered once for all of his generators as a GOP registered separately for each of his generators.</p>
<p>Response: The VSL DT thanks you for your comment. We feel that the issues you bring forward are issues with the requirements and/or the NERC entity registration process, not the VSL itself. It is outside the scope of the VSL DT to make any changes to requirements or Violation Risk Factors. Please note the important distinction that while Violation Risk Factors are used to assess the impact to reliability of violating a requirement, and are determined before any violation occurs, Violation Severity Levels are used only to identify the degree to which an entity failed to satisfy a requirement and therefore, can only be determined after a violation has occurred.</p>				
BCTC	Explanatory		<input checked="" type="checkbox"/>	<p>Should have a Not Applicable category (i.e. in addition to the Lower, Moderate, High, and Severe). By simply assigning these as Lower, it implies that an Audit Team will need to review whether there was a violation of something that has no severity. Audit Teams should only be required to audit those requirements for which compliance is required.</p>
<p>Response: The VSL DT thanks you for your comment. All requirements that have a VRF must have at least one VSL per the FERC Order. Based on comments from stakeholders, the VSL DT has reviewed all requirements listed as Explanatory Text to see whether another category was more appropriate. These categories and VSLs were modified accordingly.</p>				

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FirstEnergy	Explanatory		<input checked="" type="checkbox"/>	<p>It is not clear how an entity can violate an explanatory "requirement". We do not agree with the application of an Explanatory VSL category. In cases where VRFs were inadvertently assigned to explanatory "requirements", proper steps should be taken to remove the VRF which would negate the need for a VSL.</p> <p>As an example, in standard FAC-003, R3.1 states "Multiple sustained outages on an individual line, if caused by the same vegetation, shall be reported as one outage regardless of the actual number of outages within a 24-hour period." This is clearly explanatory text and should not have a VRF assigned to it.</p>
<p>Response: The VSL DT thanks you for your comment. All requirements that have a VRF must have at least one VSL per the FERC Order. The on-going Standards Development Process is the appropriate venue for addressing your concern about assignment of VRFs. Based on comments from stakeholders, the VSL DT has reviewed all requirements listed as Explanatory Text to see whether another category was more appropriate. These categories and VSLs were modified accordingly.</p>				
IRC SRC	Explanatory		<input checked="" type="checkbox"/>	<p>Assigning a Lower VSL to explanatory text is arbitrary and unnecessary. It is not clear why there needs to be any VSL assigned to explanatory text if a registered entity is not required to perform any action. There cannot be a measureable violation if there is no performance requirement. It is questionable whether explanatory text should even have a VRF assigned to it. However, if a VRF is required for explanatory text for purposes not related to compliance violation measurement, there does not need to be a corresponding VSL since there is no way to measure how severe a non-measureable violation could be violated - the purpose of a VSL.</p>
<p>Response: The VSL DT thanks you for your comment. All requirements that have a VRF must have at least one VSL per the FERC Order. The on-going Standards Development Process is the appropriate venue for addressing your concern about assignment of VRFs. Based on comments from stakeholders, the VSL DT has reviewed all requirements listed as Explanatory Text to see whether another category was more appropriate. These categories and VSLs were modified accordingly.</p>				
JEA	Explanatory		<input checked="" type="checkbox"/>	<p>An explanatory requirement should have N/A for all VSL's. It makes no sense to assign a VSL to a requirement that requires not action on the part of the entity.</p>
<p>Response: The VSL DT thanks you for your comment. All requirements that have a VRF must have at least one VSL per the FERC Order. Based on comments from stakeholders, the VSL DT has reviewed all requirements listed as Explanatory Text to see whether another category was more appropriate. These categories and VSLs were modified accordingly.</p>				
KCPL	Explanatory		<input checked="" type="checkbox"/>	<p>There should not be any VSL associated with an explanatory text. An explanatory text is for clarification to understand the main requirement.</p>
<p>Response: The VSL DT thanks you for your comment. All requirements that have a VRF must have at least one VSL per the FERC Order. Based on comments from stakeholders, the VSL DT has reviewed all requirements listed as Explanatory Text to see whether another category</p>				

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was more appropriate. These categories and VSLs were modified accordingly.				
Manitoba Hydro	Explanatory		<input checked="" type="checkbox"/>	<p>I'm confused as why there is a VSL for a requirement that is Explanatory Text. As per the category explanation " The Explanatory Text category establishes a classification of criteria for requirements that only provide explanatory text, but do not require action on the part of the entity." How can one be found non compliant where no action is required? Perhaps all explanatory category requirements should be exempted from VRF (as per Chapter 9 - Requirements Without VRF Assigned) and therefore the VSL would be not applicable. Another option could be to include the explanatory text within the qualifying Requirement.</p> <p>An example of this would apply to FAC-003-1. An option is to move sub-requirement R3.2 into the description of requirement R3. We would re-write R3 as follows:</p> <p>R3. The Transmission Owner shall report quarterly to its RRO, or the RRO's designee, sustained transmission line outages determined by the Transmission Owner to have been caused by vegetation. Exceptions to this requirement are:</p> <p>(1) Vegetation related outages that result from vegetation falling into lines from outside the ROW that result from natural disasters shall not be considered reportable (examples of disasters that could create non-reportable outages include, but are not limited to, earthquakes, fires, tornados, hurricanes, landslides, wind shear, major storms as defined either by the Transmission Owner or an applicable regulatory body, ice storms, and floods), and</p> <p>(2) Vegetation-related outages due to human or animal activity shall not be considered reportable (examples of human or animal activity that could cause a non-reportable outage include, but are not limited to, logging, animal severing tree, vehicle contact with tree, arboricultural activities or horticultural or agricultural activities, or removal or digging of vegetation).</p> <p>Another example of a poor application is EOP-004-1. R4 doesn't seem to fit in the Explanatory Text category as action is required and non compliance would be evident.</p>
<p>Response: The VSL DT thanks you for your comment. All requirements that have a VRF must have at least one VSL per the FERC Order. The on-going Standards Development Process is the appropriate venue for addressing your concern about assignment of VRFs and modification of the standards. Based on comments from stakeholders, the VSL DT has reviewed all requirements listed as Explanatory Text to see whether another category was more appropriate. These categories and VSLs were modified accordingly.</p>				
Manitoba Hydro	Explanatory		<input checked="" type="checkbox"/>	Please see Comment #1 in the Drafting Team's #2 question.
<p>Response: Please see response in question 2.</p>				

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Ameren (1)	Explanatory	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
NCMPA	Explanatory	<input checked="" type="checkbox"/>		OK, as long as it's used consistently (see comment immediatley above).
Response: The VSL DT thanks you for your comment. Please see our response to multi-component.				
NU	Explanatory	<input checked="" type="checkbox"/>		
MISO Stakeholders	Explanatory	<input checked="" type="checkbox"/>		

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Based on stakeholder comments, the generic table of VSLs for Implementation/Execution requirements was changed as shown below:

Lower	Moderate	High	Severe
The responsible entity's implementation/execution is non-compliant with respect to one or more minor details within the requirement.	The responsible entity's implementation/execution is non-compliant with respect to one significant element within the requirement.	The responsible entity's implementation/execution is non-compliant with respect to more than one significant element within the requirement.	The responsible entity's implementation/execution is non-compliant with most or all the elements of the requirement.

Implementation/Execution				
Company	Type of Requirement	Agree	Disagree	Comments
Ameren (2)	Implementation/Execution		<input checked="" type="checkbox"/>	<p>The Violation Severity Level (VSL) definitions for the each level from lower to severe don't provide a fair process for assessment of the violations. The Violation Risk Factor Matrix does not provide a fair process for assessment of the violations. For example the VAR-02 standard requires compliance with a voltage schedule issued by the Transmission Operator without input from the Generator Operator (GOP). It does not require any justification from the Transmission Operator for the voltage schedule that is issued. The Transmission Operators have issued voltage schedules with non-compliance tolerances ranging from plus/minus 1/2 % to more than 2%. Therefore some GOP's are required to meet a voltage range of 25% of other GOP's. The VSL definitions and risk factors measure non-compliance and risk in terms of number of times the GOP is not meeting his TO's voltage schedule. The VSL definitions should provide a fair and consistent non-compliance definition for the VAR-02 and other standards. The VSL for VAR-02 should have specific voltage range tolerance for the VSL definition and risk factors.</p> <p>It is not fair or reasonable to assign the same Violation Severity Level (VSL) for a non-compliance for a Generator Operator (GOP) registered once for all of his generators as a GOP registered separately for each of his generators.</p>
<p>Response: The VSL DT thanks you for your comment. We feel that the issues you bring forward are issues with the requirements and/or the NERC entity registration process, not the VSL itself. It is outside the scope of the VSL DT to make any changes to requirements or Violation Risk Factors. Please note the important distinction that while Violation Risk Factors are used to assess the impact to reliability of violating a</p>				

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<p>requirement, and are determined before any violation occurs, Violation Severity Levels are used only to identify the degree to which an entity failed to satisfy a requirement and therefore, can only be determined after a violation has occurred.</p>				
Entergy (2)	Implementation/ Execution		<input checked="" type="checkbox"/>	The terms "minor" and "significant" are subjective and can be widely interpreted by the entity and auditor.
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.</p>				
FirstEnergy	Implementation/ Execution		<input checked="" type="checkbox"/>	For each category table under the heading of Severe, we disagree with the use of the term "all" as used in the generic definition of a guideline document. The definition under Severe currently reads "...is non-compliant with all elements of the requirement." We suggest a change to indicate "...is non-compliant with several significant elements of the requirement".
<p>Response: The VSL DT thanks you for your comment. The VSL DT agrees with your comment and has modified the guidelines document to reflect your concept. The Severe category was modified to "The responsible entity is non-compliant with most or all significant elements of the requirement."</p>				
JEA	Implementation/ Execution		<input checked="" type="checkbox"/>	For the example, the reference to reports is confusing as R 1.3 of FAC-003-1 does not require reports. The Moderate and High statements for the training and qualifications should refer to whether the failure to adhere to its training and/or qualifications standards results in unqualified personnel designing and implementing the program, for example: Moderate: The entity failed to adhere to training or qualifications standards which did not result in unqualified personnel administering the TVMP program. High: The entity failed to adhere to training or qualifications standards which resulted in unqualified personnel administering the TVMP program.
<p>Response: The VSL DT thanks you for your comment. We have removed the inadvertent reference to reports from the example. The examples in the guidelines are for illustrative purposes only. It is envisioned that Standards Drafting Teams (industry experts) will develop specific VSLs for each requirement that meet the intent of the guidelines during the Standards Development Process. The guidelines document has been revised to clarify this intent.</p>				
Manitoba Hydro	Implementation/		<input checked="" type="checkbox"/>	The use of the terms minor and significant in VSL criteria definitions allows for too much latitude for penalty adjudicators. The VSL criteria definitions are too

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	Execution			vague to ensure consistency across all the RROs for a similar infraction of non compliance? Definitions for the terms minor and significant are necessary. What VSL would be assessed for missing both a minor and a significant detail on the same requirement?
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. If a "minor" and a "significant" element are found to be in violation for the same requirement, the most significant VSL would be applied.</p>				
Manitoba Hydro	Implementation/ Execution		<input checked="" type="checkbox"/>	Please see Comment #1 in the Drafting Team's #2 question.
<p>Response: Please see response to comment #1.</p>				
MISO Stakeholders	Implementation/ Execution		<input checked="" type="checkbox"/>	What is considered a minor detail and what is considered a significant detail and who decides? We believe that the drafting team needs to expand upon the meaning of minor and significant. Further, these two words imply the relative importance placed elements within the requirement. Isn't this what the VRF is for?
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. The VRF identifies the risk to the interconnection for not meeting a requirement. The VSL identifies the degree to which an entity missed the requirement.</p>				
NCMPA	Implementation/ Execution		<input checked="" type="checkbox"/>	See above.
<p>Response: Please see response above.</p>				
PJM	Implementation/ Execution		<input checked="" type="checkbox"/>	The proposed VSL Guideline Document uses the terms "minor" details and "significant" elements. Recognizing that the Criteria Tables for each type of requirement category contain some additional descriptions of these terms, we believe that these terms should be better defined. We note that "minor details" in the criteria table attempts to more clearly define this term as a "minor administrative weakness" and "significant element" as "objectives, work specifications, practices, procedures, or specifications."

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				<p>Although it is most likely that consensus among all audit team members will provide some 'reasonable assurance' that a minor detail or significant element of a requirement or sub-requirement can be understood/recognized, we suggest the VSL team look at each of the examples you included and holistically capture the definition and any associated, more detailed clarifications of each VSL category in one place in the guideline document for easy reference by future drafting teams. This will also better capture the criteria for use by compliance staffs in assessing the appropriate VSL.</p> <p>Recognizing that there is no way around the use of judgment in determining the VSLs and distinguishment among threshold values, we recommend that NERC use and document actual, recognized, and/or sanctioned non-compliances on a precedent setting basis going forward (as the NRC does via their publication of semi-annual reports to the industry via publicly available information called NUREGs), and explicitly state in the Guidelines document that this developing, on-going criteria will be shared as the CMEP matures. The availability of such information would serve two important and valuable purposes; (1) it would provide the industry with some assurance that additional guidance and precedent would be forthcoming for everyone's use in better defining, understanding, and distinguishing findings of non-compliance among the VSL categories, and (2) allow for comparisons of non-compliances to help NERC assure consistency in how similar findings are being dispositioned.</p>
				<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. The VSL DT will forward your last comment (paragraph) on to NERC Compliance staff for their consideration.</p>
SMUD	Implementation/ Execution		<input checked="" type="checkbox"/>	The use of language such as minor details and "significant element" should be defined more explicitly.
				<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.</p>
SOCO Gen	Implementation/ Execution		<input checked="" type="checkbox"/>	See response to question 2 below.

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Response: Please see response to question 2 below.				
WECC RCCWG	Implementation/ Execution		<input checked="" type="checkbox"/>	It is not clear what would constitute the differentiation between a "minor detail" and a "significant element" within a requirement. This differentiation should not be open to interpretation.
Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.				
Ameren (1)	Implementation/ Execution	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Although there is general agreement with the premise, there are concerns for consistency in determining which requirements are minor and which are significant.
Response: The VSL DT thanks you for your comment. The Violation Risk Factors determine the significance of a requirement. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.				
SOCO Trans	Implementation/ Execution	<input checked="" type="checkbox"/>		See Comment #1 at Question 4.
Response: Please see response to comment #1 at question 4.				
NU	Implementation/ Execution	<input checked="" type="checkbox"/>		How are "minor details" and "significant elements" defined? In most cases these qualities need to be specifically defined for a given standard/requirement. Phrases such as significant elements, or missing elements, should identify what elements are being referred to. Levels of Non-Compliance did not contain this level of ambiguity and subjectivity.
Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.				
SOCO Trans	Implementation/ Execution	<input checked="" type="checkbox"/>		See Comment #1 at Question 4.

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Response: Please see response to comment #1 at question 4.				
SPP ORWG	Implementation/ Execution	<input checked="" type="checkbox"/>		The example VSLs shown for FAC-003-1, R1.3 are not consistent with the requirement nor do they match the VSLs given in the Mandatory Standards Requirements with VSL spreadsheet.
Response: The VSL DT thanks you for your comment. The examples in the guidelines are for illustrative purposes only. It is envisioned that Standards Drafting Teams (industry experts) will develop specific VSLs for each requirement that meet the intent of the guidelines during the Standards Development Process. The guidelines document has been revised to clarify this intent.				
SERC EC DRS	Implementation/ Execution	<input checked="" type="checkbox"/>		
BCTC	Implementation/ Execution	<input checked="" type="checkbox"/>		
SERC EC DRS	Implementation/ Execution	<input checked="" type="checkbox"/>		

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Based on stakeholder comments, the generic table of VSLs for Multi-component requirements was not changed and remains as shown below:

Lower	Moderate	High	Severe
The responsible entity failed to comply with less than 25% of the number of sub-components within a requirement.	The responsible entity failed to comply with 25% or more and less than 50% of the number of sub-components within a requirement.	The responsible entity has failed to comply with 50% or more and less than 75% of the number of sub-components within a requirement.	The responsible entity has failed to comply with 75% or more of the number of sub-components.

Multi-Component				
Company	Type of Requirement	Agree	Disagree	Comments
Ameren (2)	Multi-Component		<input checked="" type="checkbox"/>	<p>The Violation Severity Level (VSL) definitions for the each level from lower to severe don't provide a fair process for assessment of the violations. The Violation Risk Factor Matrix does not provide a fair process for assessment of the violations. For example the VAR-02 standard requires compliance with a voltage schedule issued by the Transmission Operator without input from the Generator Operator (GOP). It does not require any justification from the Transmission Operator for the voltage schedule that is issued. The Transmission Operators have issued voltage schedules with non-compliance tolerances ranging from plus/minus 1/2 % to more than 2%. Therefore some GOP's are required to meet a voltage range of 25% of other GOP's. The VSL definitions and risk factors measure non-compliance and risk in terms of number of times the GOP is not meeting his TO's voltage schedule. The VSL definitions should provide a fair and consistent non-compliance definition for the VAR-02 and other standards. The VSL for VAR-02 should have specific voltage range tolerance for the VSL definition and risk factors.</p> <p>It is not fair or reasonable to assign the same Violation Severity Level (VSL) for a non-compliance for a Generator Operator (GOP) registered once for all of his generators as a GOP registered separately for each of his generators.</p>

Response: The VSL DT thanks you for your comment. We feel that the issues you bring forward are issues with the requirements and/or the NERC entity registration process, not the VSL itself. It is outside the scope of the VSL DT to make any changes to requirements or Violation Risk Factors. Please note the important distinction that while Violation Risk Factors are used to assess the impact to reliability of violating a requirement, and are determined before any violation occurs, Violation Severity Levels are used only to identify the degree to which an entity

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failed to satisfy a requirement and therefore, can only be determined after a violation has occurred.				
Hydro One	Multi-Component		<input checked="" type="checkbox"/>	If the main requirement does not have measurables (but has sub-requirements with VSLs assigned) and is only an introductory sentence, there is no need to have VSLs for it.
Response: The VSL DT thanks you for your comment. For the 83 regulatory-approved standards, each requirement and sub-requirement that has a VRF must have at least one VSL per the FERC Order.				
JEA	Multi-Component		<input checked="" type="checkbox"/>	<p>This method of assigning VSL's assumes that all the components of the requirement are equally essential to meeting the reliability objectives of the requirement, and does not address the severity at which each sub-component was missed. In addition, if you consider each sub-component "essential" then this guidance is out of line of the guidance of the other categories, where missing only one "significant" element of the requirement causes a Moderate rating. Guidance for this category should focus on whether the entity substantially meets the reliability objectives of the requirement.</p> <p>Also, if a multi-component requirement has VSL's assigned, it does not seem to make sense to also assign VSL's to each component or vice versa, so a determination should be made to do one or the other.</p> <p>In the example, EOP-005-1 R1, it seems that the entity would not be substantially meeting the reliability objectives of the requirement by missing only 2 or 3 of the elements of the restoration plan.</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT envisions that the Standards Drafting Teams will develop appropriate VSLs for each requirement based on the content of the requirement and their technical expertise. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts.</p> <p>For the 83 regulatory approved standards, each requirement and sub-requirements that has a VRF must have at least one associated VSL per the FERC Order.</p>				
KCPL	Multi-Component		<input checked="" type="checkbox"/>	This does not work well when there are less than 4 sub-requirements. There should be some freedom to identify which sub-requirements are more important than others in the VSL descriptions in the main requirement. Also, if there are VSLs for the main requirement, there should not be any VSLs for the sub-requirements. Conversely, if there are VSLs for the sub-requirements, there should not be VSLs in the main requirement. To do so penalizes an entity twice for the same problem.
Response: The VSL DT thanks you for your comment. The VSL DT envisions that the Standards Drafting Teams will develop appropriate VSLs for each requirement based on the content of the requirement and their technical expertise. The best way to resolve this is when the standards are being revised such that the requirements, VRFs, the measures and the VSLs are all done by the same team of subject matter experts.				

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For the 83 regulatory approved standards, each requirement and sub-requirements that has a VRF must have at least one associated VSL per the FERC Order. The VSL DT cannot make any guarantees with respect to the actions of the Compliance Enforcement Authority, however, the NERC Sanctions Guidelines (Paragraph 3.10) which were approved June 7, 2007 states:

“However, in instances of multiple violations related to a single act or common incidence of non-compliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction or remedial action directive bearing reasonable relationship to the aggregate of the related violations.”

Manitoba Hydro	Multi-Component		<input checked="" type="checkbox"/>	<p>If the concept of the multi component requirements is necessary then the application is flawed.</p> <p>There are significant differences in how the requirements are written because they were authored by different drafting teams. For this reason it is very difficult to use a Multi Component category consistently.</p> <p>This inconsistency is quite evident when comparing the Category Assignments and their VSL Criteria Definitions of similar requirements in the VSL Matrix provided.</p> <p>Example 1: PRC-017-0 requirement R1 and sub requirement R1.1 are each given the Explanatory category with an applicable Lower VSL. Each of subsequent sub requirements are given Implement category with the full range of VSL applicability.</p> <p>A similar requirement is TPL-001-0 R1 which is category Multi Component with its full range of applicable VSLs. The following 13 sub requirements have been assigned Explanatory Text categories with an applicable Lower VSL.</p> <p>Example 2: FAC-001-0 requirement R2 and sub requirement R2.1 are each Multi Component with a full range of applicable VSLs. Their subsequent 16 sub requirements are either Procedure or Implement categories with their full range of applicable VSLs. In this example, are the entities open to penalties for non compliance in both the multi component requirement and its sub requirements?</p> <p>Example 3: BAL-006-1 R4 is assigned category Multi Component where its only applicable VSL is Moderate with a criteria definition not consistent with the category Multi Component. R4's subsequent sub requirements are all in the Implement category with their full range of applicable VSL criteria definitions.</p> <p>It is Manitoba Hydro's position that the VSL should only be applied to the Requirement level and not at the sub requirement level. This methodology is used for TPL-001-0 R1 (Multi Component) or FAC-003-1 R3 (Reporting). The sub requirements in both these examples are categorized as Explanatory Text.</p>
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Response: The VSL DT thanks you for your comment. The VSL DT envisions that the Standards Drafting Teams will develop appropriate VSLs for each requirement based on the content of the requirement and their technical expertise. Based on comments from stakeholders, the VSL DT has reviewed all requirements listed as Explanatory Text to see whether another category was more appropriate. These categories and VSLs were modified accordingly. For the 83 regulatory approved standards, each requirement and sub-requirements that has a VRF

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<p>must have at least one associated VSL per the FERC Order. The best way to resolve these problems is when the standards are being revised such that the requirements, VRFs, the measures and the VSLs are all done by the same team of subject matter experts.</p>				
MISO Stakeholders	Multi-Component		<input checked="" type="checkbox"/>	<p>This category creates the possibility of being penalized twice for the same infraction. If an entity violates a single sub-requirement, they also violate the requirement. In essence, this becomes two violations when in reality only one violation occurred. The drafting team needs to consider how to resolve this so that double jeopardy does not occur.</p> <p>Example #1 leaves gaps in the possible range of non-compliant outcomes. For instance, the VSL do not consider the Transmission Operator failing to include 2, 4, or 6 elements. The range of scores need to included these possibilities.</p>
<p>Response: The VSL DT cannot make any guarantees with respect to the actions of the Compliance Enforcement Authority, however, the NERC Sanctions Guidelines (Paragraph 3.10) which was approved June 7, 2007 states:</p> <p style="padding-left: 40px;">“However, in instances of multiple violations related to a single act or common incidence of non-compliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction or remedial action directive bearing reasonable relationship to the aggregate of the related violations.”</p> <p>The VSL guidelines document was revised to reflect your suggestion to include all ranges of possibilities using percentages:</p> <ul style="list-style-type: none"> • VSL Lower: The responsible entity failed to comply with less than 25% of the elements listed in Attachment 1. • VSL Moderate: The responsible entity failed to comply with 25% or more and less than 50% of the elements listed in Attachment 1. • VSL High: The responsible entity has achieved a measure of performance equal to or below 50% but above 25% of the elements listed in Attachment 1. • VSL Severe: The responsible entity has achieved a measure of performance equal to or below 25% of the elements listed in Attachment 1. 				
MRO	Multi-Component		<input checked="" type="checkbox"/>	<p>Example #1 leaves gaps in the possible range of non-compliant outcomes. For instance, the VSL do not consider the Transmission Operator failing to include 2, 4, or 6 elements.</p>
<p>Response: The VSL DT thanks you for your comment. The examples in the guidelines are for illustrative purposes only. It is envisioned that Standards Drafting Teams (industry experts) will develop specific VSLs for each requirement that meet the intent of the guidelines during the Standards Development Process. The guidelines document has been revised to clarify this intent. The VSL guidelines document was revised to reflect your suggestion to include all ranges of possibilities using percentages:</p> <ul style="list-style-type: none"> • VSL Lower: The responsible entity failed to comply with less than 25% of the elements listed in Attachment 1. • VSL Moderate: The responsible entity failed to comply with 25% or more and less than 50% of the elements listed in Attachment 1. • VSL High: The responsible entity has achieved a measure of performance equal to or below 50% but above 25% of the elements listed in Attachment 1. <p>VSL Severe: The responsible entity has achieved a measure of performance equal to or below 25% of the elements listed in Attachment 1.</p>				

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NCMPA	Multi-Component		<input checked="" type="checkbox"/>	<p>In addition to the above comment, the multi-component bin is confusing and appears to be used inconsistently from one instance to another. In some cases, the sub-requirements seem to be subjugated as "explanatory text" such that meeting them simply helps you to satisfy the major requirement (MOD-017-0, R1). In other instances, the sub-requirements themselves have different bins and seem to be subject to some rating of compliance individually, even though the major requirement indicates that what follows is a list of items to be included (PRC-010-0, R1.1 and its sub-requirements).</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT envisions that the Standards Drafting Teams will develop appropriate VSLs for each requirement based on the content of the requirement and their technical expertise. Based on comments from stakeholders, the VSL DT has reviewed all requirements listed as Explanatory Text to see whether another category was more appropriate. These categories and VSLs were modified accordingly.</p>				
NU	Multi-Component		<input checked="" type="checkbox"/>	<p>It is stated that for sub-requirements (or requirements listed on attachments) use of the quartile methodology is suggested. It is not clear how assignment of different severity levels to the various sub-requirements (or listed items) will "roll-up" into the quartiles of the parent.</p> <p>e.g. – If there are 5 sub-requirements and all 5 are violated at the "Lower" level, does this roll-up to 5 out of 5 or 100% non-compliance, and result in the "Severe" level being assigned to the parent? Or what if there were 2 "Lower(s)", and 1 each of "Moderate", "High", and "Severe"? Etc, etc.</p> <p>Potential solutions could include assigning weights to each sub-requirement severity level and calculate an average for the group; or not assign a VSL to the parent requirement at all.</p> <p>Also, if violation of a sub-requirement also rolls up into a violation of the parent requirement, and if both are sanctionable; is it possible for an entity to be sanctioned twice for the same violation? Procedures should be clear so as to prevent this eventuality.</p>
<p>Response: The VSL DT thanks you for your comment. We have modified the guidelines document to clarify the how violation of sub-requirements impact the parent requirement. The Standards Drafting Teams should use their expertise to develop specific VSLs for these examples.</p> <p>The VSL DT cannot make any guarantees with respect to the actions of the Compliance Enforcement Authority, however, the NERC Sanctions Guidelines (Paragraph 3.10) which was approved June 7, 2007 states:</p> <p style="padding-left: 40px;">"However, in instances of multiple violations related to a single act or common incidence of non-compliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction or remedial action directive bearing reasonable relationship to the aggregate of the related violations."</p>				
PJM	Multi-Component		<input checked="" type="checkbox"/>	<p>The proposed VSL Guideline Document uses the terms "minor" details and "significant" elements. Recognizing that the Criteria Tables for each type of requirement category contain some additional descriptions of these terms, we</p>

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				<p>believe that these terms should be better defined. We note that "minor details" in the criteria table attempts to more clearly define this term as a "minor administrative weakness" and "significant element" as "objectives, work specifications, practices, procedures, or specifications."</p> <p>Although it is most likely that consensus among all audit team members will provide some 'reasonable assurance' that a minor detail or significant element of a requirement or sub-requirement can be understood/recognized, we suggest the VSL team look at each of the examples you included and holistically capture the definition and any associated, more detailed clarifications of each VSL category in one place in the guideline document for easy reference by future drafting teams. This will also better capture the criteria for use by compliance staffs in assessing the appropriate VSL.</p> <p>Recognizing that there is no way around the use of judgment in determining the VSLs and distinguishment among threshold values, we recommend that NERC use and document actual, recognized, and/or sanctioned non-compliances on a precedent setting basis going forward (as the NRC does via their publication of semi-annual reports to the industry via publicly available information called NUREGs), and explicitly state in the Guidelines document that this developing, on-going criteria will be shared as the CMEP matures. The availability of such information would serve two important and valuable purposes; (1) it would provide the industry with some assurance that additional guidance and precedent would be forthcoming for everyone's use in better defining, understanding, and distinguishing findings of non-compliance among the VSL categories, and (2) allow for comparisons of non-compliances to help NERC assure consistency in how similar findings are being dispositioned.</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. The VSL DT will forward your last comment (paragraph) on to NERC Compliance staff for their consideration.</p>				
WECC LRS	Multi-Component		<input checked="" type="checkbox"/>	<p>The proposed structure for Multi-component standards leads to potential sanctions for missing a specified fraction of the sub-components PLUS a sanction for each missed sub-component, which also have VSLs and sanctions identified for them. For example, MOD-018-0. R1 (multi-component) does not even have an action; all the actions are in the sub-components R1.1 and R1.2. Where there is no action, the VSL should be "N/A," whether the action is missing at the upper level, or as suggested in respect to "Explanatory Text," it is missing at the lower level.</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT cannot make any guarantees with respect to the actions of the</p>				

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Compliance Enforcement Authority, however, the NERC Sanctions Guidelines (Paragraph 3.10) which were approved June 7, 2007 states:
 “However, in instances of multiple violations related to a single act or common incidence of non-compliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction or remedial action directive bearing reasonable relationship to the aggregate of the related violations.”

For the 83 regulatory-approved standards, the VSL DT is required to assign at least one VSL for each requirement and sub-requirement that contains a VRF, per FERC order. The VSL DT suggests that the best way to resolve these problems is when the standards are being revised such that the requirements, VRFs, the measures and the VSLs are all done by the same team of subject matter experts.

WECC RCCWG	Multi-Component		<input checked="" type="checkbox"/>	The components of a multi-component requirement do not necessarily carry the same level of importance, therefore assigning equal weight to each component does not give an overall measure of the degree to which an entity failed to satisfy a requirement. It is not clear why some requirements have multiple components that will be looked at as a group, but other requirements have subrequirements that are each considered to have separate compliance.
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Response: The VSL DT thanks you for your comment. We have modified the guidelines document to clarify the how violation of sub-requirements impact the parent requirement. The Standards Drafting Teams should use their expertise to develop specific VSLs based on the content of the requirement and their technical expertise.

SOCO Trans	Multi-Component		<input checked="" type="checkbox"/>	See Comment #1 at Question 4.
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Response: Please see response to comment #1 at question 4.

SPP ORWG	Multi-Component		<input checked="" type="checkbox"/>	The SDT should look at eliminating the VSLs for the requirements that are labeled as multi-component. Assigning a VSL to the main element as well as the sub-element(s) creates a double jeopardy risk. In some situations, the main element is where the weight of the requirement lies with the sub-elements simply being a listing of items to be included or considered in the main element. VSLs should not be assigned to the sub-elements in this case. In other situations, the main element is only a lead-in statement with the meat of the requirement in the sub-elements. In this case, it is meaningless to assign a VSL to the main element. Again, the example VSLs do not match those given in the Mandatory Standards Requirements with VSL spreadsheet.
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Response: The VSL DT thanks you for your comment. The VSL DT cannot make any guarantees with respect to the actions of the Compliance Enforcement Authority, however, the NERC Sanctions Guidelines (Paragraph 3.10) which were approved June 7, 2007 states:
 “However, in instances of multiple violations related to a single act or common incidence of non-compliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction or remedial action directive bearing reasonable relationship to the aggregate of the related violations.”

To comply with the FERC order, the VSL DT is required (for the 83 regulatory-approved standards) to assign at least one VSL for each requirement and sub-requirement that contains a VRF. The examples used in the guidelines are meant to be illustrative. The Standards

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Drafting teams will use the guidelines and their technical expertise to develop VSLs in the on-going Standards Development Process.				
Ameren (1)	Multi-Component	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	This criteria would work best if all of the sub-requirements would carry the same weight. However, there are concerns that all the sub-requirements in a standard should not carry the same weight, and therefore should not be evaluated on the same basis. Further, there are concerns for use of the quartile methodology if there are less than 4 sub-requirements.
Response: The VSL DT thanks you for your comment. We concur that not all sub-requirements carry the same weight from a VSL standpoint, and the Standards Drafting teams will determine which sub-requirements are "minor" or "significant " based on their technical expertise. The VSL DT envisions that the Standards Drafting Teams will develop appropriate VSLs for each requirement based on the content of the requirement and their technical expertise. The best way to resolve these problems is when the standards are being revised such that the requirements, VRFs, the measures and the VSLs are all done by the same team of subject matter experts.				
FirstEnergy	Multi-Component	<input checked="" type="checkbox"/>		While we agree with the use of the multi-component approach, the example shown on page 23 of the guideline document does not appear to be a correct application of the definitions in the table. The intended use is that each range is inclusive on the lower value and not the upper value in the range. The example should be adjusted to match. For example, Lower should read " <=1 and < 5, Moderate would read "<=5 and < 10", etc. Additionally, Example 1 referencing EOP-005 should be revised to reflect the appropriate ranges of elements missed and not just 1, 3, 5 or 7. The actual VSL prepared in the worksheet is more accurate because it references the percentiles that would be applicable.
Response: The VSL DT thanks you for your comment. The guidelines document was revised to reflect your suggestion for the example to include all ranges of possibilities using percentages.				
<ul style="list-style-type: none"> • VSL Lower: The responsible entity failed to comply with less than 25% of the elements listed in Attachment 1. • VSL Moderate: The responsible entity failed to comply with 25% or more and less than 50% of the elements listed in Attachment 1. • VSL High: The responsible entity has achieved a measure of performance equal to or below 50% but above 25% of the elements listed in Attachment 1. • VSL Severe: The responsible entity has achieved a measure of performance equal to or below 25% of the elements listed in Attachment 1. 				
SERC RRS	Multi-Component	<input checked="" type="checkbox"/>		breakdown (25/25/25/25) of multi-component should be flexible to adjust VSL based on the number of sub-requirements or other distribution (i.e. 10/15/25/50).
Response: The VSL DT thanks you for your comment. The VSL DT envisions that the Standards Drafting Teams will develop appropriate VSLs for each requirement based on the content of the requirement and their technical expertise. The best way to resolve these problems is when the standards are being revised such that the requirements, VRFs, the measures and the VSLs are all done by the same team of subject				

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matter experts.				
SOCO Gen	Multi-Component	<input checked="" type="checkbox"/>		
BCTC	Multi-Component	<input checked="" type="checkbox"/>		
SMUD	Multi-Component		<input checked="" type="checkbox"/>	
SERC EC DRS	Multi-Component	<input checked="" type="checkbox"/>		

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Based on stakeholder comments, the generic table of VSLs for Numeric Performance requirements was not changed and remains as shown below:

Lower	Moderate	High	Severe
1st quartile	2nd quartile	3rd quartile	4th quartile
The responsible entity has failed to meet the minimum acceptable performance of the requirement but has achieved a performance level equal to or above the 75 th percentile of the appropriate measure.	The responsible entity has achieved the measure of performance level below the 75 th percentile but equal to or above the 50 th percentile of the appropriate measure.	The responsible entity has achieved the measure of performance level below or equal to the 50 th percentile but equal to or above the 25 th percentile of the appropriate measure.	The responsible entity has achieved the measure of performance level below the 25 th percentile of the appropriate measure.

Numeric Performance				
Company	Type of Requirement	Agree	Disagree	Comments
Ameren (2)	Numeric Performance		<input checked="" type="checkbox"/>	<p>The Violation Severity Level (VSL) definitions for the each level from lower to severe don't provide a fair process for assessment of the violations. The Violation Risk Factor Matrix does not provide a fair process for assessment of the violations. For example the VAR-02 standard requires compliance with a voltage schedule issued by the Transmission Operator without input from the Generator Operator (GOP). It does not require any justification from the Transmission Operator for the voltage schedule that is issued. The Transmission Operators have issued voltage schedules with non-compliance tolerances ranging from plus/minus 1/2 % to more than 2%. Therefore some GOP's are required to meet a voltage range of 25% of other GOP's. The VSL definitions and risk factors measure non-compliance and risk in terms of number of times the GOP is not meeting his TO's voltage schedule. The VSL definitions should provide a fair and consistent non-compliance definition for the VAR-02 and other standards. The VSL for VAR-02 should have specific voltage range tolerance for the VSL definition and risk factors.</p> <p>It is not fair or reasonable to assign the same Violation Severity Level (VSL) for a non-compliance for a Generator Operator (GOP) registered once for all of his generators as a GOP registered separately for each of his generators.</p>
<p>Response: The VSL DT thanks you for your comment. We feel that the issues you bring forward are issues with the requirements and/or the</p>				

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<p>NERC entity registration process, not the VSL itself. It is outside the scope of the VSL DT to make any changes to requirements or Violation Risk Factors. Please note the important distinction that while Violation Risk Factors are used to assess the impact to reliability of violating a requirement, and are determined before any violation occurs, Violation Severity Levels are used only to identify the degree to which an entity failed to satisfy a requirement and therefore, can only be determined after a violation has occurred.</p>				
Hydro One	Numeric Performance		<input checked="" type="checkbox"/>	<p>NP1. For the Lower/1st quartile, you use the word "failed" and for the Severe/4th quartile you use the word "achieved". I suggest using sentences and words consistent with the other requirement performance criteria. Example, For Lower/1st quartile, "The responsible entity is mostly compliant with minor exception. Performance level equal to or above the 75th percentile of the appropriate measure".</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT does not disagree with your comment, but we also feel that your comment does not makes any substantive improvements to the guidelines. We have chosen to leave the guideline document in its original text.</p>				
JEA	Numeric Performance		<input checked="" type="checkbox"/>	<p>The quartile approach is arbitrary. The guideline should provide for the standards development committee to use professional judgment in the setting of the VSL.</p>
<p>Response: The VSL DT thanks you for your comment. The quartile approach covers two of the three suggested methods for assigning VSLs that Standards Drafting Teams have at their disposal. The Standards Drafting Teams of subject matter experts are expected to assign specific VSLs based on their technical expertise.</p>				
KCPL	Numeric Performance		<input checked="" type="checkbox"/>	<p>Numeric performance should not be limited solely to percentages. Percentages tend to mask poor performance. As an example, an entity that has 16 occurrences of a violation of something, has a Lower VSL for 4 violations. Another entity that has 4 occurrences of a violation of the same thing has a Severe VSL with the same 4 violations. The VSLs should identify poor performance and percentages do not always to that.</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT agrees that Numeric performance should not be limited solely to percentages. The Standards Drafting Teams of subject matter experts are expected to assign specific VSLs based on their technical expertise and they may or may not choose to employ percentages.</p>				
Manitoba Hydro	Numeric Performance		<input checked="" type="checkbox"/>	<p>A clearer understanding is required as to the reason behind the selection of Numeric Performance methodology for each Requirement and the justification for sizing the quartile. for example; BAL-001-0 R1 and R2 the quartiles are evenly sized at 5% each while BAL-002-0 R3, R4, R5 & R6 quartiles are all 10% in size.</p> <p>See Question #2 (paragraph 3) for additional comments.</p>
<p>Response: The VSL DT thanks you for your comment. The existing levels of non-compliance (in the regulatory approved standards) were</p>				

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used to develop the VSLs that you reference by the assigned standards drafting team.				
MISO Stakeholders	Numeric Performance		<input checked="" type="checkbox"/>	NP1 appears to apply the quartile approach across the whole range of possible noncompliant outcomes. Then the example for NP1 applies NP1 evenly across the possible range of non-compliant scores for R2, BAL-001-0. Why wouldn't a score be established that sets a floor for the quartile approach based on actual industry averages. For example, any score below 50% is likely to occur rarely and thus would be severe violation. Then the range from 50-90% could be evenly divided across the remaining VSLs. In other words, is this example an appropriate application of NP1 or should NP2 be applied.
The VSL DT thanks you for your comment. The VSL DT agrees that a floor could be developed for a Numeric requirement. The Standards Drafting Teams of subject matter experts are expected to assign specific VSLs based on their technical expertise and they may include a floor value if it is technically justified.				
MRO	Numeric Performance		<input checked="" type="checkbox"/>	NP2 and NP3 seem to insinuate that the target values or minimum values would be developed by the SDT in the standard development process of the individual standard... is this correct? We recommed clarifying where these values would come from.
Response: The VSL DT thanks you for your comment. The Standards Drafting Teams of subject matter experts are expected to assign specific VSLs based on their technical expertise.				
PJM	Numeric Performance			<p>The proposed VSL Guideline Document uses the terms "minor" details and "significant" elements. Recognizing that the Criteria Tables for each type of requirement category contain some additional descriptions of these terms, we believe that these terms should be better defined. We note that "minor details" in the criteria table attempts to more clearly define this term as a "minor administrative weakness" and "significant element" as "objectives, work specifications, practices, procedures, or specifications."</p> <p>Although it is most likely that consensus among all audit team members will provide some 'reasonable assurance' that a minor detail or significant element of a requirement or sub-requirement can be understood/recognized, we suggest the VSL team look at each of the examples you included and holistically capture the definition and any associated, more detailed clarifications of each VSL category in one place in the guideline document for easy reference by future drafting teams. This will also better capture the criteria for use by compliance staffs in assessing the appropriate VSL.</p> <p>Recognizing that there is no way around the use of judgment in determining the VSLs and distinguishment among threshold values, we recommend that NERC use and document actual, recognized, and/or sanctioned non-compliances on a precedent setting basis going forward (as the NRC does via their publication of semi-annual reports to the industry via publicly available information called NUREGs), and explicitly state in the Guidelines document that this developing, on-going criteria will be shared as the CMEP matures. The</p>

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				availability of such information would serve two important and valuable purposes; (1) it would provide the industry with some assurance that additional guidance and precedent would be forthcoming for everyone's use in better defining, understanding, and distinguishing findings of non-compliance among the VSL categories, and (2) allow for comparisons of non-compliances to help NERC assure consistency in how similar findings are being dispositioned.
				Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. The VSL DT will forward your last comment (paragraph) on to NERC Compliance staff for their consideration.
SPP ORWG	Numeric Performance		<input checked="" type="checkbox"/>	The DST may want to consider adding a specific numeric count of events rather than restricting the category to percentages. Although the break points are consistent, there are wording differences between the VSLs in the example and those given in the Mandatory Standards Requirements with VSL spreadsheet.
				Response: The VSL DT thanks you for your comment. The guidelines proposed should not preclude Standards Drafting Teams from using a specific numeric count in assigning VSLs if they deem appropriate. The Standards Drafting Teams of subject matter experts are expected to assign specific VSLs based on their technical expertise.
Ameren (1)	Numeric Performance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	For NP1, there are concerns for consistency in determining minor versus significant exceptions. For NP2, there are concerns for the development of a subjective equivalent score, as some of the requirements may not carry the same weight. Further, in the absence of a specific value or target in the standard requirement, the VSL should not be establishing a minimum acceptable value, technically supportable or not. If there is a target value in the standard requirement, then it should be used (NP3).
				Response: The VSL DT thanks you for your comment. The standards drafting teams are expected to assign specific VSLs that avoid using terms such as minor and significant. VRFs, rather than VSLs determine the weight of the requirement. We concur with your comment regarding the minimum acceptable value. The example used (NP2) in the guidelines document was for illustrative purposes only and made an assumption that there was a minimum acceptable value already in the requirement. We also concur with your comment regarding NP3
BCTC	Numeric Performance	<input checked="" type="checkbox"/>		

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SMUD	Numeric Performance	<input checked="" type="checkbox"/>		
SERC EC DRS	Numeric Performance	<input checked="" type="checkbox"/>		
SOCO Gen	Numeric Performance	<input checked="" type="checkbox"/>		
SOCO Trans	Numeric Performance	<input checked="" type="checkbox"/>		See Comment #1 at Question 4.
Response: Please see response to comment #1 at question 4.				
WECC RCCWG	Numeric Performance	<input checked="" type="checkbox"/>		
FirstEnergy	Numeric Performance	<input checked="" type="checkbox"/>		
NCMPA	Numeric Performance	<input checked="" type="checkbox"/>		
NU	Numeric Performance	<input checked="" type="checkbox"/>		

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

Based on stakeholder comments, the generic table of VSLs for Procedure/Program requirements was changed as shown below:

Lower	Moderate	High	Severe
The responsible entity's program/procedure is non-compliant with respect to one or more minor details within the requirement.	The responsible entity's program/procedure is non-compliant with respect to at least one significant element within the requirement.	The responsible entity's program/procedure is non-compliant with respect to two or more significant elements within the requirement.	The responsible entity's program/procedure is non-compliant with most or all the elements of the requirement.

Procedure/ Program				
Company	Type of Requirement	Agree	Disagree	Comments
Ameren (2)	Procedure/ Program		<input checked="" type="checkbox"/>	<p>The Violation Severity Level (VSL) definitions for the each level from lower to severe don't provide a fair process for assessment of the violations. The Violation Risk Factor Matrix does not provide a fair process for assessment of the violations. For example the VAR-02 standard requires compliance with a voltage schedule issued by the Transmission Operator without input from the Generator Operator (GOP). It does not require any justification from the Transmission Operator for the voltage schedule that is issued. The Transmission Operators have issued voltage schedules with non-compliance tolerances ranging from plus/minus 1/2 % to more than 2%. Therefore some GOP's are required to meet a voltage range of 25% of other GOP's. The VSL definitions and risk factors measure non-compliance and risk in terms of number of times the GOP is not meeting his TO's voltage schedule. The VSL definitions should provide a fair and consistent non-compliance definition for the VAR-02 and other standards. The VSL for VAR-02 should have specific voltage range tolerance for the VSL definition and risk factors.</p> <p>It is not fair or reasonable to assign the same Violation Severity Level (VSL) for a non-compliance for a Generator Operator (GOP) registered once for all of his generators as a GOP registered separately for each of his generators.</p>

Response: The VSL DT thanks you for your comment. We feel that the issues you bring forward are issues with the requirements and/or the NERC entity registration process, not the VSL itself. It is outside the scope of the VSL DT to make any changes to requirements or Violation Risk Factors. Please note the important distinction that while Violation Risk Factors are used to assess the impact to reliability of violating a requirement, and are determined before any violation occurs, Violation Severity Levels are used only to identify the degree to which an entity

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failed to satisfy a requirement and therefore, can only be determined after a violation has occurred.				
Entergy (2)	Procedure/ Program		<input checked="" type="checkbox"/>	The terms "minor" and "significant" are subjective and can be widely interpreted by the entity and auditor.
Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.				
FirstEnergy	Procedure/ Program		<input checked="" type="checkbox"/>	For each category table under the heading of Severe, we disagree with the use of the term "all" as used in the generic definition of a guideline document. The definition under Severe currently reads "...is non-compliant with all elements of the requirement." We suggest a change to indicate "...is non-compliant with several significant elements of the requirement".
Response: The VSL DT thanks you for your comment. The VSL DT agrees with your comment and has modified the guidelines document to reflect your concept. The Severe category was modified to "The responsible entity's program / procedure is non-compliant with most or all the elements of the requirement."				
JEA	Procedure/ Program		<input checked="" type="checkbox"/>	For the example the Moderate statement should read: A TVMP has been developed and is missing one or more significant elements (objectives, only includes partial set of work specifications, etc.) but does not prevent the entity from substantially meeting the reliability objectives of the requirement. This wording along with the current reading for the High statement emphasizes that what is important is whether the reliability objectives are being substantially met.
Response: The VSL DT thanks you for your comment. This suggestion would have enhanced the example in the VSL Guidelines – in the revised guidelines, the VSL DT focused the example on the 'update' of the TVMP rather than on the content, so the proposed revision was not used.				
Manitoba Hydro	Procedure/ Program		<input checked="" type="checkbox"/>	The use of the terms minor and significant in VSL criteria definitions allows for too much latitude for penalty adjudicators. The VSL criteria definitions are too vague to ensure consistency across all the RROs for a similar infraction of non compliance? Definitions for the terms minor and significant are necessary. What VSL would be assessed for missing both a minor and a significant detail on the same requirement?
Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the				

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standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. If a "minor" and a "significant" element are found to be in violation for the same requirement, the most significant VSL would be applied.				
Manitoba Hydro	Procedure/ Program		<input checked="" type="checkbox"/>	Please see Comment #1 in the Drafting Team's #2 question.
Response: Please see response to Comment #1.				
MISO Stakeholders	Procedure/ Program		<input checked="" type="checkbox"/>	What is considered a minor detail and what is considered a significant detail and who decides? We believe that the drafting team needs to expand upon the meaning of minor and significant. Further, these two words imply the relative importance placed elements within the requirement. Isn't this what the VRF is for?
Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. The VRF identifies the risk to the interconnection for not meeting a requirement. The VSL identifies the degree to which an entity missed complying with the requirement.				
NCMPA	Procedure/ Program		<input checked="" type="checkbox"/>	The proposed criteria continue to leave the determination of specifically how (or how well) a standard is satisfied subject to the interpretation of auditors. When the proposed criteria distinguish levels of severity based on terms like "minor details," "significant element," "substantially compliant," it still leaves unclear what the expectations are to achieve full compliance. Unless the SDTs or those with compliance responsibility within NERC are willing to post specific examples of what constitutes a completely satisfactory response to a requirement, entities subject to the requirements are left with at least some level of uncertainty about whether what they have done will be satisfactory and no way to determine that until they are audited. With that type of subjectivity, it seems that the VSL criteria are biased toward finding at least some level of non-compliance for nearly any requirement.
Response: The VSL DT thanks you for your comment. The expectation of compliance should be defined in the requirement and not the VSL. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT suggests that the best way to resolve these problems is when the standards are being revised such that the requirements, VRFs, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. VSLs are not biased toward finding an entity non-compliant. VSLs only identify the level after				

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non-compliance with a requirement has been identified.				
PJM	Procedure/ Program		<input checked="" type="checkbox"/>	<p>The proposed VSL Guideline Document uses the terms "minor" details and "significant" elements. Recognizing that the Criteria Tables for each type of requirement category contain some additional descriptions of these terms, we believe that these terms should be better defined. We note that "minor details" in the criteria table attempts to more clearly define this term as a "minor administrative weakness" and "significant element" as "objectives, work specifications, practices, procedures, or specifications."</p> <p>Although it is most likely that consensus among all audit team members will provide some 'reasonable assurance' that a minor detail or significant element of a requirement or sub-requirement can be understood/recognized, we suggest the VSL team look at each of the examples you included and holistically capture the definition and any associated, more detailed clarifications of each VSL category in one place in the guideline document for easy reference by future drafting teams. This will also better capture the criteria for use by compliance staffs in assessing the appropriate VSL.</p> <p>Recognizing that there is no way around the use of judgment in determining the VSLs and distinguishment among threshold values, we recommend that NERC use and document actual, recognized, and/or sanctioned non-compliances on a precedent setting basis going forward (as the NRC does via their publishment of semi-annual reports to the industry via publicly available information called NUREGs), and explicitly state in the Guidelines document that this developing, on-going criteria will be shared as the CMEP matures. The availability of such information would serve two important and valuable purposes; (1) it would provide the industry with some assurance that additional guidance and precedent would be forthcoming for everyone's use in better defining, understanding, and distinguishing findings of non-compliance among the VSL categories, and (2) allow for comparisons of non-compliances to help NERC assure consistency in how similar findings are being dispositioned.</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. The VSL DT will forward your last comment (paragraph) on to NERC Compliance staff for their consideration.</p>				
SMUD	Procedure/ Program		<input checked="" type="checkbox"/>	<p>For subrequirements, there should be an explicit statement as to whether they carry as much weight as the requirements.</p>

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Response: The VSL DT thanks you for your comment. Violation Risk Factors, rather than VSLs, determine the "weight" of requirements or sub-requirements.				
SOCO Gen	Procedure/ Program		<input checked="" type="checkbox"/>	See response to question 2 below.
Response: Please see response to question 2 below.				
WECC RCCWG	Procedure/ Program		<input checked="" type="checkbox"/>	It is not clear what would constitute the differentiation between a "minor detail" and a "significant element" within a requirement. This differentiation should not be open to interpretation.
Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.				
Ameren (1)	Procedure/ Program	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Although there is general agreement with the premise, there are concerns for consistency in determining which requirements are minor and which are significant.
Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.				
SOCO Trans	Procedure/ Program	<input checked="" type="checkbox"/>		See Comment #1 at Question 4.
Response: Please see response to comment #1 at question 4.				
SPP ORWG	Procedure/ Program	<input checked="" type="checkbox"/>		Could be improved if the VSLs were more specifically tailored to each requirement, as in the provided example, rather than being so generic. Unfortunately, the example VSLs do not match those given in the Mandatory Standards Requirements with VSL spreadsheet. For consistency with the other categories, change the High VSL language to '...more than one...' rather than '...two or more...'
Response: The VSL DT thanks you for you comment. We agree with your suggestion to tailor the VSL for each requirement and that is what				

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<p>is expected of standards drafting teams going forward. The examples in the guidelines are for illustrative purposes only. It is envisioned that Standards Drafting Teams (industry experts) will develop specific VSLs for each requirement that meet the intent of the guidelines during the Standards Development Process. The guidelines document has been revised to clarify this intent. Specific language changes, such as you suggest above, have been made to the guidelines to be more consistent.</p>				
NU	Procedure/ Program	<input checked="" type="checkbox"/>		<p>How are "minor details" and "significant elements" defined?</p> <p>In most cases these qualities need to be specifically defined for a given standard/requirement. Phrases such as significant elements, or missing elements, should identify what elements are being referred to.</p> <p>Levels of Non-Compliance did not contain this level of ambiguity and subjectivity.</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.</p>				
SERC EC DRS	Procedure/ Program	<input checked="" type="checkbox"/>		
BCTC	Procedure/ Program	<input checked="" type="checkbox"/>		

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Based on stakeholder comments, the generic table of VSLs for Reporting requirements was changed as shown below:

Lower	Moderate	High	Severe
The responsible entity is non-compliant in the reporting of required information with respect to one or more minor details within the requirement.	The responsible entity is non-compliant in the reporting of required information with respect to at least one significant element within the requirement.	The responsible entity is non-compliant in the reporting of required information with respect to more than one significant element within the requirement.	The responsible entity's reporting is non-compliant with most or all the elements of the requirement.

Reporting				
Company	Type of Requirement	Agree	Disagree	Comments
Ameren (2)	Reporting		<input checked="" type="checkbox"/>	<p>The Violation Severity Level (VSL) definitions for the each level from lower to severe don't provide a fair process for assessment of the violations. The Violation Risk Factor Matrix does not provide a fair process for assessment of the violations. For example the VAR-02 standard requires compliance with a voltage schedule issued by the Transmission Operator without input from the Generator Operator (GOP). It does not require any justification from the Transmission Operator for the voltage schedule that is issued. The Transmission Operators have issued voltage schedules with non-compliance tolerances ranging from plus/minus 1/2 % to more than 2%. Therefore some GOP's are required to meet a voltage range of 25% of other GOP's. The VSL definitions and risk factors measure non-compliance and risk in terms of number of times the GOP is not meeting his TO's voltage schedule. The VSL definitions should provide a fair and consistent non-compliance definition for the VAR-02 and other standards. The VSL for VAR-02 should have specific voltage range tolerance for the VSL definition and risk factors.</p> <p>It is not fair or reasonable to assign the same Violation Severity Level (VSL) for a non-compliance for a Generator Operator (GOP) registered once for all of his generators as a GOP registered separately for each of his generators.</p>
<p>Response: The VSL DT thanks you for your comment. We feel that the issues you bring forward are issues with the requirements and/or the NERC entity registration process, not the VSL itself. It is outside the scope of the VSL DT to make any changes to requirements or violation risk factors. Please note the important distinction that while Violation Risk Factors are used to assess the impact to reliability of violating a requirement, and are determined before any violation occurs, Violation Severity Levels are used only to identify the degree to which an entity failed to satisfy a requirement and therefore, can only be determined after a violation has occurred.</p>				

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Entergy (2)	Reporting		<input checked="" type="checkbox"/>	The terms "minor" and "significant" are subjective and can be widely interpreted by the entity and auditor.
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.</p>				
FirstEnergy	Reporting		<input checked="" type="checkbox"/>	For each category table under the heading of Severe, we disagree with the use of the term "all" as used in the generic definition of a guideline document. The definition under Severe currently reads "...is non-compliant with all elements of the requirement." We suggest a change to indicate "...is non-compliant with several significant elements of the requirement".
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.</p>				
JEA	Reporting		<input checked="" type="checkbox"/>	The guidance needs to give factors to consider and allow the standards development committees to use judgment. The factors to consider should include: lateness, percentage of missing reports, amount and significance of missing data on submitted reports. The VSL should include whether the entity substantially met or did not substantially meet the objectives of the requirement.
<p>Response: The VSL DT thanks you for your comment. It is envisioned that the Standards Drafting Teams, using their expertise, will develop specific VSLs for each requirement through the on-going Standards Development Process.</p>				
Manitoba Hydro	Reporting		<input checked="" type="checkbox"/>	The use of the terms minor and significant in VSL criteria definitions allows for too much latitude for penalty adjudicators. The VSL criteria definitions are too vague to ensure consistency across all the RROs for a similar infraction of non compliance? Definitions for the terms minor and significant are necessary. What VSL would be assessed for missing both a minor and a significant detail on the same requirement?
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant"</p>				

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elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. If a "minor" and a "significant" element are found to be in violation for the same requirement, the most significant VSL would be applied.				
Manitoba Hydro	Reporting		<input checked="" type="checkbox"/>	Please see Comment #1 in the Drafting Team's #2 question.
Response: Please see response to comment #1.				
MISO Stakeholders	Reporting		<input checked="" type="checkbox"/>	What is considered a minor detail and what is considered a significant detail and who decides? We believe that the drafting team needs to expand upon the meaning of minor and significant. Further, these two words imply the relative importance placed elements within the requirement. Isn't this what the VRF is for?
Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. The VRF identifies the risk to the interconnection for not meeting a requirement. The VSL identifies the degree to which an entity missed complying with the requirement.				
NCMPA	Reporting		<input checked="" type="checkbox"/>	See above.
Response: Please see response above.				
SMUD	Reporting		<input checked="" type="checkbox"/>	In cases where the missing minor detail does not affect the achievement of compliance, consider revising so that the language in the standard and that in the VSL align better.
Response: The VSL DT thanks you for your comment. VSLs are "after the fact" and are only used to determine the level of non-compliance.				
SERC EC DRS	Reporting		<input checked="" type="checkbox"/>	As shown in the example, time lines should be the basis for Reporting requirements.
Response: The VSL DT thanks you for your comment. The Standards Drafting Teams, utilizing their expertise, are tasked with determining specific VSLs for each requirement.				
SOCO Gen	Reporting		<input checked="" type="checkbox"/>	See response to question 2 below.
Response: Please see response to question 2.				

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WECC RCCWG	Reporting		<input checked="" type="checkbox"/>	It is not clear what would constitute the differentiation between a "minor detail" and a "significant element" within a requirement. This differentiation should not be open to interpretation.
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.</p>				
PJM	Reporting		<input checked="" type="checkbox"/>	<p>The proposed VSL Guideline Document uses the terms "minor" details and "significant" elements. Recognizing that the Criteria Tables for each type of requirement category contain some additional descriptions of these terms, we believe that these terms should be better defined. We note that "minor details" in the criteria table attempts to more clearly define this term as a "minor administrative weakness" and "significant element" as "objectives, work specifications, practices, procedures, or specifications."</p> <p>Although it is most likely that consensus among all audit team members will provide some 'reasonable assurance' that a minor detail or significant element of a requirement or sub-requirement can be understood/recognized, we suggest the VSL team look at each of the examples you included and holistically capture the definition and any associated, more detailed clarifications of each VSL category in one place in the guideline document for easy reference by future drafting teams. This will also better capture the criteria for use by compliance staffs in assessing the appropriate VSL.</p> <p>Recognizing that there is no way around the use of judgment in determining the VSLs and distinguishment among threshold values, we recommend that NERC use and document actual, recognized, and/or sanctioned non-compliances on a precedent setting basis going forward (as the NRC does via their publication of semi-annual reports to the industry via publicly available information called NUREGs), and explicitly state in the Guidelines document that this developing, on-going criteria will be shared as the CMEP matures. The availability of such information would serve two important and valuable purposes; (1) it would provide the industry with some assurance that additional guidance and precedent would be forthcoming for everyone's use in better defining, understanding, and distinguishing findings of non-compliance among the VSL categories, and (2) allow for comparisons of non-compliances to help NERC assure consistency in how similar findings are being dispositioned.</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be</p>				

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<p>used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. The VSL DT will forward your last comment (paragraph) on to NERC Compliance staff for their consideration.</p>				
Ameren (1)	Reporting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Although there is general agreement with the premise, there are concerns for consistency in determining which requirements are minor and which are significant.
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.</p>				
SOCO Trans	Reporting	<input checked="" type="checkbox"/>		See Comment #1 at Question 4.
<p>Response: Please see response to comment #1 at question 4.</p>				
SPP ORWG	Reporting	<input checked="" type="checkbox"/>		Again, the example VSLs do not match those given in the Mandatory Standards Requirements with VSL spreadsheet.
<p>Response: The VSL DT thanks you for your comment. The examples in the guidelines are for illustrative purposes only. It is envisioned that Standards Drafting Teams (industry experts) will develop specific VSLs for each requirement that meet the intent of the guidelines during the Standards Development Process. The guidelines document has been revised to clarify this intent.</p>				
BCTC	Reporting	<input checked="" type="checkbox"/>		
NU	Reporting	<input checked="" type="checkbox"/>		<p>How are "minor details" and "significant elements" defined?</p> <p>In most cases these qualities need to be specifically defined for a given standard/requirement. Phrases such as significant elements, or missing elements, should identify what elements are being referred to.</p> <p>Levels of Non-Compliance did not contain this level of ambiguity and subjectivity.</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the</p>				

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same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what “minor” or “significant” elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.

Exelon	<input checked="" type="checkbox"/>			
AEP	<input checked="" type="checkbox"/>			
Avista	<input checked="" type="checkbox"/>			
Chelan County PUD #1	<input checked="" type="checkbox"/>			
Dominion	<input checked="" type="checkbox"/>			
Entergy (1)	<input checked="" type="checkbox"/>			
SERC EC PSS	<input checked="" type="checkbox"/>			
SERC EC SRG	<input checked="" type="checkbox"/>			
WECC OTS	<input checked="" type="checkbox"/>			
Uninet	<input checked="" type="checkbox"/>			

2. Do you have any other comments regarding the Violation Severity Levels Development Guidelines? If yes, please provide comments in support of your answer in the comment area.

Summary Consideration: Many comments that were received took issue with the use of the terms “minor” or “significant” elements of a requirement. The VSL DT used these terms in the draft VSL Development Guidelines to provide guidance to the standards drafting teams. The VSL DT did not envision that these terms would be used in VSLs during the on-going standards development process. The VSL DT feels that VSLs should be developed concurrent with requirements, Violation Risk Factors, and measurements and be performed all by the same team of experts. It is envisioned that future standard drafting teams will revise VSLs by specifically identifying the “minor” or “significant” elements for each requirement. The SDTs will also be responsible for reviewing the conversion of Levels of Non-Compliance to VSLs. The VSL DT has modified the guideline document to reflect this concept.

Other comments received involved specific suggestions for revisions to the guideline document. Where appropriate, these suggestions have been incorporated in the guidelines document. We also received some specific comments concerning the examples that we used in the guidelines. The examples are for illustrative purposes. It is expected the Standards Drafting Teams will develop technically sound VSLs based on the guidelines and their subject matter expertise.

Committer	Yes	No	Comment
Ameren (1)	<input checked="" type="checkbox"/>		<p>It is not clear how relatively broad terms such as 'minor' or 'significant' as found in the Development Guidelines document would be given similar consideration across various RRO's. These terms are open to wide interpretation.</p> <p>On page 7 of the document, it is stated that "To the extent that existing Levels of Non-Compliance contained in the current approved standards are specific to a unique requirement, those criteria were given strong consideration for continued use as Violation Security Levels." Any Violation Severity Levels which are developed as a result of these unique requirements should be given scrutiny to assure that they fit with the newly developed methodology.</p> <p>On page 10 of the document, under Procedure/Program, Application of Criteria Text View, for the 'VSL Lower' category it states:</p> <p>"A TVMP has been developed but the TVMP has minor administrative weaknesses (e.g. not fully current, not approved in timely fashion)." What is considered a timely fashion?</p> <p>On page 12, under Application of Criteria Text View, under the 'VSL Lower' category, an OE-417 Form is mentioned. We are not familiar with that Form.</p> <p>The example provided in the Reporting section (Page 15 of the document) does not match the Reporting Criteria Table. The example refers to time frames in the individual Violation Severity Levels instead of elements of non-compliance.</p> <p>Thank you for the opportunity to provide comments. NERC has assigned the SDTs a thankless job to</p>

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

Commenter	Yes	No	Comment
			<p>develop VSL criteria for assignment to each and every standard requirement and sub-requirement. NERC and the SDTs have devised these multiple categories of VSL criteria to fit the various reliability standards requirements. However, some of these VSL categories do not fit the standards very well, and it appears that others have been inconsistently applied. The phrase about "fitting a square peg in a round hole" comes to mind. Rather than address the specific language for each VSL (lower, moderate, high, and severe) for each requirement at this time, it would have been better to get general agreement on the VSL category for each requirement (Procedure, Implementation, Reporting, Coordination, etc.), and then develop the appropriate language for the VSLs. We understand that there is a push to get these standards approved and implemented, but the method selected requires too much information to be digested too fast. Thus we have concerns related to having to live with the results from such a broad undertaking.</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The SDTs will also be responsible for reviewing the conversion of Levels of Non-Compliance to VSLs. The VSL DT has modified the guideline document to reflect this concept.</p> <p>The example for TVMP in the guidelines is for illustrative purposes and it is expected that the SDTs will develop specific VSLs for each requirement in the on-going Standards Development Process.</p> <p>Form OE-417 replaces EIA-417 and is a form issued by the Department of Energy for reporting certain types of events.</p> <p>The reporting example deals with a requirement to submit a report within a specified timeframe.</p> <p>Concerning your last paragraph, the VSL DT was given the assignment of developing VSLs for all requirements that have a VRF. The VSLs for all 83 regulatory approved standards must be filed with FERC by March 1, 2008. The on-going Standards Development Process will allow for Standards Drafting Teams of industry experts to develop / modify technically excellent VSLs as standards are developed or revised. Your continued participation in the Standards Development Process is welcomed and appreciated.</p>			
Exelon			<p>Many of the VSLs use the term "significant element" when defining noncompliance rather than being specific on what those elements are or providing numbers. It is not clear, within the various requirements, what is considered to be a "significant element". An effort to clarify "significant element" should be undertaken especially as the number of elements in the requirement that are considered "significant" is important for grading purposes. For instance, on TOP-001, R4, "all reliability directives including shedding firm load" which and/or how many portions of the requirement are considered "significant elements"? If only one part of the requirement is deemed "significant", for example, then entities can either be classified as "Lower VSL" or "Severe VSL" since there is only one significant element to pick from. The standards need to be specific on what is "significant" so that entities clearly understand how noncompliance with one or more of those elements, where applicable, applies to the VSLs. It is otherwise difficult to judge the consistency level of the VSLs with the standards.</p>

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Commenter	Yes	No	Comment
			<p>EOP-004-1, R3.3 -- For this standard, and others with similar VSL descriptions, the descriptions are too vague (they include phrases like "substantially compliant", "mostly compliant", "substantially deficient"). It is not clear what these phrases mean relative to the requirement and therefore has the potential to make assignment of a VSL highly subjective. Assuming that the words "Significant Element" are more specifically defined within the standards, as per the above comment, it would be desirable to quantify, where possible, the meaning of the VSL descriptions.</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.</p>			
BCTC	<input checked="" type="checkbox"/>		<p>Chapter 9 - Requirements without VRF Assigned: Should have a Not Applicable category (i.e. in addition to the Lower, Moderate, High, and Severe). By simply assigning these as Lower, it implies that an Audit Team will need to review whether there was a violation of something that has no severity. Audit Teams should only be required to audit those areas for which compliance is required.</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT agrees with your comment and we have modified the guideline document to reflect that each requirement without a VRF has, "Not Applicable" instead of a "Lower" VSL.</p>			
AEP	<input checked="" type="checkbox"/>		<p>There needs to be more cohesion between violation risk factor and violation severity level when determining sanction amounts. Requirements with lower violation risk factors probably don't need multiple degrees of violation severity levels to be monitored. A lower risk factor should not have corresponding high and severe VSL's but only lower and moderate VSL's. A medium risk factor should not have a corresponding severe VSL but only lower, moderate and high VSL's. Moderate, High and Severe VSLs should not be applicable unless the noncompliance has the potential for direct and immediate negative impacts on the BES. Or unless the entity is totally unresponsive to a requirement.</p> <p>Some VSL use the description "The responsible entity has demonstrated the reporting of required information but is noncompliant with minor details while still satisfying all significant elements". A violation criteria based on "minor details" is highly subjective and places potentially responsibility entities in a vulnerable position subject to differing interpretations by auditors and other, as well as associated financial penalties.</p> <p>Another example is: "The responsible entity has demonstrated the existence of the required procedure/program but is missing minor details or minor program/procedural elements. Such deficiencies would not impact the achievement of the objective of the requirement." On one hand the entity is considered to have achieved the requirement's objective, yet at the same time is noncompliant due to "minor elements".</p> <p>Many standards/requirements are slated for clarification, revision and consolidation with other standards. Moderate, high and severe VSLs should not be set for requirements that are subject to change and interpretation.</p>
<p>Response: The VSL DT thanks you for your comment. Violation Risk Factors are used to assess the impact to reliability of violating a</p>			

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Commenter	Yes	No	Comment
<p>requirement, and are determined before any violation occurs. Violation Severity Levels are used only to identify the degree to which an entity failed to satisfy a requirement and therefore, can only be determined after a violation has occurred. The VSL DT developed the guidelines to allow Standards Drafting Teams to utilize their expertise to develop consistent, technically excellent VSLs.</p> <p>The guidelines were modified to omit the phrases, "while still satisfying all significant elements," and, "would not impact the achievement of the objective of the requirement."</p> <p>The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.</p> <p>As the Standards Development Process is an on-going endeavor, all requirements are subject to revision. The VSL DT is required to assign VSLs to all requirements with a VRF by March 1, 2008.</p>			
Avista	<input checked="" type="checkbox"/>		<p>My concern is that the individual drafting teams use the same VSL Guidelines when drafting or revising Standards. There needs to be consistency when different groups are working on the same issues. I recommend that when it comes to the VSL, the VSL Drafting Team and the Standard Drafting Teams come to an agreement on the VSL before they are proposed.</p>
<p>Response: The VSL DT thanks you for your comment. The guidelines document was developed as a tool for the Standards Drafting Teams to use in developing the VSLs. The VSL DT collaborated with existing drafting teams to develop the set of VSLs for the 83 regulatory-approved standards. When the final version of this document is in place, the VSL DT does not feel the need to continue to work with individual drafting teams.</p>			
Chelan County PUD #1	<input checked="" type="checkbox"/>		<p>Chelan PUD applauds the efforts of the VSL drafting team. It is evident that a significant amount of thought went into the drafting of the Violation Severity Levels Development Guidelines Criteria. The multi-faceted approach represented in the guideline document provides guidance and consistency, yet allows for the technical differences in standards. A singular "one-size fits all" approach would not allow for the flexibility needed to determine what severity means for each requirement.</p> <p>The determination of severity should not be done separate and apart from the development of the standards. The technical experts best able to draft standards are also the same experts best able to determine severity. After approval of the guideline document and initial matrix, we request that NERC require all drafting teams to review the VSLs as part of their drafting process. Further we request that drafting teams be required to use the guideline document in their evaluation of severity levels to ensure consistent understanding and application across all standards.</p>
<p>Response: The VSL DT thanks you for your comment. NERC will incorporate the guidelines in the Drafting Team Guidelines for use by future Standards Drafting Teams. Each team will be responsible for reviewing / revising VSLs for each requirement.</p>			
Dominion	<input checked="" type="checkbox"/>		<p>A. The Guideline does not address the assignment of VSL's to a given requirement and subrequirement. It is not clear whether, in some cases, a double violation situation would occur. (see comments in Q3)</p> <p>B. The Guideline must define the distinction between "minor" and "significant" elements, "Substantially compliant", "Mostly compliant", "Substantially deficient" has not been sufficiently defined. (see</p>

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Commenter	Yes	No	Comment
			comments in Q3)
<p>Response: The VSL DT thanks you for your comment.</p> <p>Paragraph A: The VSL DT cannot make any guarantees with respect to the actions of the Compliance Enforcement Authority, however, the NERC Sanctions Guidelines (Paragraph 3.10) which were approved June 7, 2007 states:</p> <p style="padding-left: 40px;">“However, in instances of multiple violations related to a single act or common incidence of non-compliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction or remedial action directive bearing reasonable relationship to the aggregate of the related violations.”</p> <p>Paragraph B: The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are “minor” or “significant”. The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what “minor” or “significant” elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.</p>			
Entergy (1)	<input checked="" type="checkbox"/>		<p>Comments on Violation Severity Levels (VSLs) Reference NERC Development Guidelines Criteria Dated 10/10/2007</p> <p style="text-align: center;">Chapter 1, Overview</p> <p>GENERAL COMMENTS</p> <p>“Violation Risk Factors are used to assess the impact to reliability of violating a requirement, and are determined before any violation occurs, Violation Severity Levels are used only to identify the degree to which an entity failed to satisfy a requirement and therefore, can only be determined after a violation has occurred.”</p> <p>It is recognized that compliance, however, must not be considered only an after thought. A regulator cannot dismiss enforcement when an issue is determined to be of low significance.</p> <p>GUIDELINE COMMENTS</p> <p>The enforcement approach for VSLs should integrate the following functions:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Consider taking into account on the front-end severity level and consequence, whether or not the entity self-identified the issue and if corrective actions have been identified; no follow-up action by NERC would be required (i.e. no mitigation plan). The violation would still be docketed but the justification for no follow-up would be clearly stated as “self-identification”. This practice would speak to improving industry compliance culture. <input type="checkbox"/> An initial screening process should be allowed to screen out issues

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Commenter	Yes	No	Comment
			<p>determined to be weaknesses or deficiencies and should not be subject to further evaluation by NERC but would be addressed by the registered entity. Weaknesses or deficiencies should be defined and are not considered violations as defined in the NERC Sanction Guidelines. The NERC guidelines define a violation as "...a failure or inadequacy to meet (emphasis added) a requirement of a reliability standard..." A proposed definition for a weakness or deficiency could be:</p> <p>An issue or concern that is generally narrow in scope and is related to regulatory requirements or standards of performance that affects a portion of the process or program, such that overall performance remains adequate. It may be an identified vulnerability that needs to be resolved to enhance the ability to safely and reliably operate and to make and sustain future improvements.</p> <p>The areas in the guideline where this primarily applies is in Chapter 2 (pg. 10), Chapter 3 (pg. 12):</p> <p><input type="checkbox"/> The VSLs are in a category type structure (e.g. Procedure, Reporting, Communication, etc) and are a generic approach and not performance-based. The current VSL structure is based on the number of requirement elements which assumes the violation is more severe based on the number of elements in noncompliance. The current approach seems to promote a VSL for almost every requirement. VSLs should be based on the performance impact and consequences of the specific requirement's purpose. This would be more meaningful and provide a graded performance-based approach. In addition, this approach would better support the NERC Sanction Guideline criteria that states "Up to four levels can be defined for each requirement." This guidance does not require four levels for each requirement. Examples would be:</p> <ol style="list-style-type: none"> 1. The Reporting performance category would typically have no high or severe levels since reporting itself is not normally associated with any impacts or consequences. 2. Procedure/Program Category Example: <p style="padding-left: 40px;">Lower</p> <p>The responsible entity's program/procedure is non-compliant with respect to one or more greater than minor details within the requirement.</p> <p style="padding-left: 40px;">AND</p> <p>No impact on the Bulk Electric System.</p> <p style="padding-left: 40px;">Moderate</p> <p>Some elements are present in the responsible entity's program/procedure, but is non-compliant with respect to one significant element within the requirement.</p> <p style="padding-left: 40px;">AND</p> <p>No impact on the Bulk Electric System.</p> <p style="padding-left: 40px;">High</p> <p>The responsible entity's program/procedure is non-compliant with all the elements of the requirement.</p> <p style="padding-left: 40px;">AND</p> <p>No actual impact on the Bulk Electric System.</p> <p style="padding-left: 40px;">Severe</p>

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Commenter	Yes	No	Comment
			<p>The responsible entity's program/procedure is non-compliant with all the elements of the requirement. AND The Bulk Electric System was impacted.</p> <p>In many cases, there does not appear to be much separation between the High VSL and Severe VSL. A heavier reliance on a performance-based approach considering impacts and consequences could provide a better definition and predictability.</p> <p>Chapters 2 and 3</p> <p>These chapters appear somewhat duplicative and combining them should be considered. The execution element in Chapter 3 would most likely appear in one of the other VSL categories.</p> <p>Chapter 6</p> <p>Dividing the severity of a violation by quartiles is arbitrary with no real merit between the significance of each quartile. A condition could be at 50% or a Moderate VSL and another condition could be at 51% and move to a High VSL and statistically their difference is insignificant. In this specific category, the Numeric Performance category should rely heavily on the significance of the condition relative to reliability/impact.</p> <p>OTHER ITEMS FOR CONSIDERATION</p> <p><input type="checkbox"/> Provide incentives to improve performance and compliance to provide measures of deterrence since most entities strive to improve and avoid regulatory actions and enforcement sanctions. Monthly performance metrics are currently being supplied to NERC which could be collectively compiled by functional area. Consider an Enforcement Dashboard as both a "stick and carrot" accessible on the NERC Website. This would provide visible performance metrics across the industry, relative to a functional groups peers, and provide the peer pressure to support improved compliance without the need for increased penalties. This approach has been effective for the Nuclear Regulatory Commission and INPO. Performance metrics to consider would be Balancing performance areas (managing of reserves), Disturbance Recovery Time, Number of TLR 5's reported, Energy Emergency Alerts, Operating Security Limit Violations, etc.</p>
			<p>Response: The VSL DT thanks you for your comments. The majority of your comments ask the VSL DT to consider risk in the assignment of VSLs. The VRF defines the risk for each requirement and must be held separately from the VSL. Your comments are otherwise valid and should be addressed to the Compliance Monitoring and Enforcement Plan. The VSL DT will forward your comments to NERC Compliance Staff for their consideration.</p> <p>Chapters 2 and 3 represent two distinct functions and will be kept separate.</p> <p>Chapter 6: The quartiles examples are for illustrative purposes. It is expected the Standards Drafting Teams will develop technically sound VSLs based on the guidelines and their subject matter expertise.</p>

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Commenter	Yes	No	Comment
<p>Other items: The VSL DT will forward your comments to NERC Compliance Staff for their consideration.</p>			
<p>FirstEnergy</p>	<p><input checked="" type="checkbox"/></p>		<p>1) The "Violation Severity Levels Development Guidelines Criteria" document represents a reasonable approach for assessing the extent to which a particular requirement was missed by a responsible entity for the current state of the FERC approved reliability standards. The standards as they currently exist were not written and developed with an expectation that every requirement and sub-requirement would have a VRF and VSL assigned to them therefore it is difficult to arrive at meaningful VSLs at a requirement level. This is supported based on the fact that in many standards existing levels of non-compliance are not written at the requirement level, but based on a view of the overall standard.</p> <p>Therefore, it can be expected that the guidance offered in the Severity Level Development Guidelines Criteria may be dynamic for some period of time as the standards evolve. Going forward, the use of "multi-component" should be reconsidered and possibly eliminated. A violation level simply based on a list of items and the number of items missed does not seem appropriate for the long-term. Rather, the VSL should clearly state which items within the list are considered "minor" and "significant" and if those items are missed it drives the overall VSL performance.</p> <p>As standards are improved, it should be expected that both VRFs and VSLs are limited to the "primary" requirement level, or that each requirement must be viewed as a stand alone requirement and written as such.</p> <p>2) It is not clear within the guideline document who will be establishing VSLs for newly proposed and revised standards. It is FE's opinion that VSLs need to be established within the context of the ANSI approved standard development process and therefore prepared by standard drafting teams and vetted through industry.</p> <p>3) We recommend that the table shown on page 8 of the guideline document be revised to more generically reference an entity's adherence to a requirement and remove the reference to "program/procedure".</p> <p>4) The generic language reflected in the guide for the lower, moderate, high and severe categories is sufficient in offering guidance to establish a VSL. What is not clear, however, is who decides what a "minor" or "significant" detail entails. We suggest that a definition be defined by the VSL standard drafting team for these terms and included in the guideline document. Without a definition, the terms are too subjective and left to the eye of the beholder.</p> <p>5) It is not clear if this document is intended to be a stand alone document or reside as an appendix or within other NERC documentation. It is suggested that the document may be included in NERC's standard development guideline document.</p> <p>6) See our response to Question Number 4 for general feedback related to the application of the VSL Guideline Document as presented for the FERC approved reliability standards.</p>
<p>Response: The VSL DT thanks you for your comments.</p>			

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Commenter	Yes	No	Comment
<p>1) We concur with your feedback and we agree that the guideline document and the VSLs are going to be dynamic within the Standards Development Process going forward. Drafting teams working on new or revised standards have been advised to assign a VRF only to the main requirement.</p> <p>2) The Standards Drafting Teams will develop VSLs for newly proposed and revised standards.</p> <p>3) We have modified the guideline per your comment. For example, the Severe VSL now reads: "The responsible entity's program/procedure is non-compliant with most or all the elements of the requirement."</p> <p>4) The Standards Drafting Teams will determine what are "minor" or "significant" elements for the requirements based on their technical expertise and knowledge of the requirement.</p> <p>5) The VSL guidelines will be incorporated in the NERC Standards Drafting Team Guidelines document.</p> <p>6) Please see response to question 4.</p>			
Hydro One	<input checked="" type="checkbox"/>		The guidelines themselves are a good idea however, when implemented, the descriptions must include details specific to the requirement and not generic explanations.
<p>Response: The VSL DT thanks you for your response. The VSL DT agrees with your comment and we attempted to provide specific details for the VSLs by involving existing drafting teams. Going forward, the Standards Drafting Teams will develop VSLs for requirements using the Standards Development Process.</p>			
IRC SRC	<input checked="" type="checkbox"/>		<p>The ISO RTO Council Standards Review Committee believes many of requirements found in the FERC approved standards were not intended to be measured and should not be forced to meet FERC's criteria for enforceable reliability standards. The SRC agrees with the need to develop Violation Risk Factors and Violation Severity Levels for those requirements that are measureable and if violated have real and imminent risks to the reliability of the system. However, applying VRFs and VSLs to parts of the standards such as Explanatory Text adds little or no value to the industry and instead could distract the industry into focusing efforts on interpretations of text in standards that have no meaningful requirements and directing resources into efforts that have little or no benefit to reliability. The SRC has chosen not to complete responses to Question #3 for this joint consensus response, individual ISO RTO Council members may submit comments separately</p>
<p>Response: The VSL DT thanks you for your comment. The FERC Order requires that each requirement and sub-requirement of the 83 regulatory approved standards that has a VRF be assigned a VSL.</p>			
JEA	<input checked="" type="checkbox"/>		<p>Each VSL should be designed to reinforce the intent of the standard. The moderate and high definitions should not focus on the number of "significant elements" in the requirement, but should focus on the impact of the absence of the significant elements, i.e. does the violation prevent the entity from substantially meeting the reliability objectives of the requirement. A possible rewording for the generic Moderate ranking could be "The responsible entity's program/procedure is non-compliant with respect to one or more significant elements within the requirement, but does not prevent the entity from substantially meeting the reliability objectives of the requirement. A possible rewording for the Severe ranking could be "The responsible entity's program/procedure is non-compliant with respect to one or more significant elements within the requirement, and prevents the entity from substantially meeting the reliability objectives of the requirement.</p> <p>The VSLs for a standard should not just copy the words out of the guidelines, as it appears has been done. The standards development team should look at the standard and develop the VSL based on the</p>

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

Commenter	Yes	No	Comment
			<p>content of the standard (It appears this was done on a few standards, such as PER-002-0).</p> <p>There appears to be a typo in the first paragraph of the scope - Violation Risk Factors instead of Violation Severity Levels.</p>
<p>Response: The VSL DT thanks you for your comment. Your first paragraph deals with risk and this must be kept separate from the VSLs. We agree that the VSL should not be copied from the guideline and left generic. Prior to posting the VSL assignments, the VSL DT consulted with existing Standards Drafting Teams in an attempt to create specific VSLs. It is expected that Standards Drafting Teams will develop specific VSLs for each requirement. We have deleted the VRF reference in the scope.</p>			
Manitoba Hydro	<input checked="" type="checkbox"/>		<p>We appreciate the amount of work that has gone into the Violation Severity Levels Development Guidelines. The VRF's and the VSL's are very important as they will be used for the most part to determine what the penalty will be for non compliance. Justification for a VSL must be definitive and for this reason a generic approach will not work. It is unclear how the drafting teams have applied the guideline document in assigning draft VSL's to all the standards. In particular, the application of the Multi-component and Explanatory categories is not uniform across the standards. The drafting teams need to produce a rationale document (something like a business practice manual) to help the industry understand how they applied the guideline.</p> <p>The use of the terms minor and significant in VSL criteria definitions allows for too much latitude for penalty adjudicators. The VSL criteria definitions are too vague to ensure consistency across all the RROs for a similar infraction of non compliance? Definitions for the terms minor and significant are necessary. What VSL would be assessed for missing both a minor and a significant detail on the same requirement?</p> <p>Numeric Performance: Selecting BAL-001-0 R2 for your examples of NP1, NP2 and NP3 was confusing. When we compared your examples to the actual VSL matrix it was unclear as to which criteria was used. Neither NP1, NP2, or NP3 seemed to apply.</p> <p>Scope: 1st paragraph 3rd sentence... "Violation Risk Factor" should be be Violation Severity Level</p> <p>BAL-004-0 R3.2 was not accounted for in the VSL matrix provided.</p>
<p>Response: The VSL DT thanks you for your comment. Based on comments from stakeholders, the VSL DT has reviewed all requirements listed as Explanatory Text to see whether another category was more appropriate. These categories and VSLs were modified accordingly. The VSL DT reviewed all requirements in the matrix and modified the categories that did not follow the guidelines.</p> <p>The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.</p> <p>NP1-3 were developed as illustrative examples. The existing Standards Drafting Team developed the VSL based on the levels of non-compliance.</p>			

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Commenter	Yes	No	Comment
<p>We have corrected the scope.</p> <p>This requirement is listed in the matrix, but is out of numeric order.</p>			
MISO Stakeholders			<p>1. Chapter one of the Criteria document indicates that some requirements may fit into more than one category and that the standard drafting teams were asked to provide rationale when selecting one category over another. Who decides the rationale is valid? Should the document provide some guidance on how to make this decision?</p> <p>2. The Scope Section and the Chapter One Overview Section state that the VSL Development Guidelines present a "consistent approach to assess the degree to which a particular reliability standard requirement was violated." However, the Chapter One Overview Section also states that "to the extent that the existing Levels of Non-Compliance contained in the current approved standards are specific to a unique requirement, those criteria were given strong consideration for continued use as Violation Severity Levels." This in effect states that the existing Levels of Non-Compliance will be used in many cases even if they are inconsistent with the new VSL Development Guidelines. In fact, we believe there are many instances where the existing levels of Non-Compliance were used and result in VSL's inconsistent with the VSL Development Guidelines (specific examples are listed in the matrix in Question 3, but many VSL's need to be modified). This approach is improper and would not result in an overall set of consistent VSL 's. The existing levels of Non-Compliance should only be used if they are consistent with the VSL Development Guidelines.</p> <p>3. The last sentence on page 6 indicates that the drafting team was given the task to assign VSL(s) to every requirement and sub-requirement. Page 7 indicates that this is restricted to only those with VRFs. The last sentence on page 6 should be modified to reflect the restriction.</p> <p>4. It is not clear how VSLs can be reasonably established for the myriad of requirements that do not currently have measures. How can one measure how bad a requirement is violated without the measure defined? Before VSLs can be assigned, measurements need to be developed. If a reasonable measurement cannot be developed, a VSL should not be applied to a requirement.</p>
<p>Response: The VSL DT thanks you for your comment.</p> <p>1) The Standards Drafting Team responsible for developing a standard is also responsible for assigning a VSL for each requirement that has a VRF. These will be posted for comment so that stakeholders can have input. The comments received will be given all due consideration by the SDT.</p> <p>2) Based on comments from stakeholders, the VSL DT has reviewed all requirements in the VSL matrix and modified the categories that did not follow the guidelines. Specific VSLs were then drafted for each requirement. Existing Levels of Non-compliance were utilized to draft the VSLs where appropriate.</p> <p>3) The guidelines document was modified as per your suggestion. The FERC order directed NERC to develop a VSL for every requirement and sub-requirement in the 83 regulatory-approved standards that has a VRF.</p> <p>4) In the FERC Order, NERC is required to provide a VSL for each requirement and sub-requirement that has a VRF. While the team agrees that many requirements and sub-requirements have either no measure or a substandard measure, we must provide a VSL regardless.</p>			
MRO NSRS	<input checked="" type="checkbox"/>		<p>1. Why did the Drafting Team chose to categorize the Requirements into 8 Categories? If one takes the draft Criteria Tables from all 8 Categories and compares them one will see that there are essentially 4</p>

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Committer	Yes	No	Comment
			<p>Categories. Please consider this simplified approach:</p> <p>Category 1: includes the DT’s categories of: (Procedure/Program, Implementation/Execution, Reporting, Coordination/Communication) VSL Low = one or more missing minor details VSL Mod = one significant element missing VSL High = 2 or more significant elements missing VSL Severe = All significant elements missing</p> <p>Category 2: the DT’s category of Numeric Performance VSL Low = as drafted VSL Mod = as drafted VSL High = as drafted VSL Severe = as drafted</p> <p>Category 3: the DT’s category of Multi-component VSL Low = as drafted VSL Mod = as drafted VSL High = as drafted VSL Severe = as drafted</p> <p>Category 4: the DT’s categories of: (Explanatory Text, Rs without VRF assigned) VSL Low = Text of Requirement does not have and associated VSL VSL Mod = NA VSL High = NA VSL Severe = NA</p> <p>2. Page 7 of the VSL criteria states "Any proposed changes to the criteria or the Violation Severity Levels must be accompanied with documentation and supportable evidence that is in keeping with the objective of maintaining a reliable system." RECOMMEND striking "or the Violation Severity Levels" as per the Reliability Standards Development Procedure V6.1 – "The Violation Severity Levels are part of the standards and are balloted with the standard, and developed by the NERC Compliance program in coordination with the standard drafting team." Additionally when a Requirement is rewritten as a part of NERC’s 3 year work plan, the VSLs will also have to be rewritten and the idea of supportable evidence in this situation does not seem to be necessary.</p>
<p>Response: The VSDLT thanks you for your comment. 1) After much debate within the VSL DT, it was decided to develop the proposed VSL categories outlined in the guidelines document. We feel like our breakdown of the categories allows for a better assignment of the VSLs. 2) The VSL DT agrees with your comment and we have modified the document. This statement was originally meant for drafting teams who might propose changes to the criteria or VSLs while working on this particular project (2007-23). It was not meant to be included for the on-going standards development process.</p>			
PJM	<input checked="" type="checkbox"/>		The Guidelines Documents needs clarity to address how a requirement with TWO significant elements would be dispositioned if neither of the two elements were satisfied. More specifically, would this

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Commenter	Yes	No	Comment
			<p>situation result in a "high" or "severe" penalty? The criteria tables distinguish between non-compliance of one significant element and two significant elements, but if only two significant elements are contained within a requirement and the two is also 'all of the significant elements,' than would that be classified as high or severe? As is it currently written, either category seems appropriate.</p> <p>In addition, regarding the "multi-component" types of requirements, additional verbiage needs to be added to the Guidelines Document such that an entity will not have two sanctions applied for a non-compliance associated with a requirement that contains sub-requirements and could be interpreted as one issue violating more than one requirement (often referred to as 'double jeopardy'). If it is the intention of the VSL team that only one violation (with the most severe VSL) should result, than the criteria document needs to explicitly state so. Further, if this approach of only having one violation result is consistent with NERC Sanction Guidelines, Section 3.10, "Multiple Violations," which states:</p> <p style="padding-left: 40px;">" ...in instances of multiple violations related to a single act or common common incidence of noncompliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction, or remedial action directive bearing reasonable relationship to the aggregate of the related violations. The penalty, sanction, or remedial action will NOT BE THAT DETERMINED INDIVIDUALLY for the least serious of the violations; it will generally be at least as large or expansive as what would be called for individually for the most serious of the violations."</p> <p>then this too should be explicitly stated in the Guideline Document.</p> <p>Lastly, noting that all requirements should be considered important (because they are requirements although not currently written to be equally weighted among requirements or among sub-requirements), we recommend that the VSL team should not set most VSLs to the highest most severe category for the purpose of increasing the penalty associated with a non-compliance. The ERO in its function as the compliance entity has the latitude to escalate penalties where warranted to correct for any bad behaviors, and as such, the assigned VSLs should not be set artificially high but rather established to methodically and appropriately reflect distinguishable categories/degrees/thresholds of noncompliance.</p>
<p>Response: The VSL DT thanks you for your comment. The Standards Drafting Teams will use the guidelines as a reference to assign VSLs. They will take into account the intent of the requirement and their technical expertise to develop an appropriate VSL.</p> <p>The VSL DT cannot make guarantees with respect to future actions of the Compliance Enforcement Authority.</p> <p>The VSL DT did not intend to weigh VSLs towards the high/severe categories to increase penalties. The guidelines were developed to provide Standards Drafting Teams guidance in developing technically excellent and justified VSLs.</p>			
SMUD			<p>1. The VSLs should be checked against the language in the standards so as to close any gaps in interpretation. One example of such a gap is FAC-008-1 which does not require that the entity demonstrate currency, but refers to the documentation of the "current methodology used for developing Facility Ratings." However, the Lower VSL indicates that meeting this requirement without</p>

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Commenter	Yes	No	Comment
			<p>demonstrating currency of the methodology results in a Lower VSL.</p> <p>2. Definitions for "minor detail" and "significant element" need to be more explicit and they need to be aligned with the language within the standards.</p> <p>3. In some instances, descriptions of VSLs adjacent to one another are indistinguishable. In such cases, we suggest that the VSL be collapsed into one or the other.</p> <p>4. In instances where a "minor detail" that does not adversely impact the achievement of compliance is missing, we suggest that the applicability of a VSL be reconsidered or alternatively, the language within the standards and the VSL be revised to better align.</p>
<p>Response: The VSL DT thanks you for your comment. 1) It is envisioned that Standards Drafting Teams will revise VSLs based on the requirement and their technical expertise. 2) The Standards Drafting Teams will specifically identify what "minor" or "significant" elements are for each requirement. 3) In these cases, it is acceptable to have less than four VSLs. Each requirement must have at least one VSL. 4) See response 2.</p>			
SERC EC DRS	<input checked="" type="checkbox"/>		<p>1.) The example provided in the Reporting section does not match the Reporting Criteria Table since it uses time lines instead of elements of non-compliance. The Reporting Criteria Table should use time lines.</p> <p>2.) The terms "minor details" and "significant elements" need to be well defined for each requirement of each standard where this approach is used.</p> <p>3.) To be consistent, the first category should be labeled "low" rather than "lower."</p>
<p>Response: The VSL DT thanks you for your requirement. The reporting example is for a requirement that specifies a timing requirement. The generic text for reporting provides a guideline for illustration. The Standards Drafting Teams will develop specific VSLs based on the content of the requirement as well as the guideline. The SDT will also develop the distinction between "minor" and "significant" elements for the VSL. The first category (lower) matches the name used in the Sanctions Guidelines.</p>			
SERC EC PSS	<input checked="" type="checkbox"/>		<p>The example provided in the Reporting section does not match the Reporting Criteria Table since it uses time lines instead of elements of non-compliance.</p> <p>There needs to be a distinction between minor details and significant elements. Otherwise there could be different interpretations between regional entities.</p>
<p>Response: The VSL DT thanks you for your requirement. The reporting example is for a requirement that specifies a timing requirement. The generic text for reporting provides a guideline for illustration. The Standards Drafting Teams will develop specific VSLs based on the content of the requirement as well as the guideline. The SDT will also develop the distinction between "minor" and "significant" elements for the VSL.</p>			
SERC EC SRG	<input checked="" type="checkbox"/>		<p>The example provided in the Reporting section does not match the Reporting Criteria Table since it uses time lines instead of elements of non-compliance.</p> <p>There needs to be a distinction between minor details and significant elements. Otherwise there could be different interpretations between regional entities.</p> <p>The Scope Section and the Chapter One Overview Section state that the VSL Development Guidelines present a "consistent approach to assess the degree to which a particular reliability standard requirement was violated." However, the Chapter One Overview Section also states that "to the extent that the existing Levels of Non-Compliance contained in the current approved standards are specific to a</p>

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Commenter	Yes	No	Comment
			<p>given requirement, those criteria were given strong consideration for continued use as Violation Severity Levels." This in effect states that the existing Levels of Non-Compliance will be used in many cases even if they are inconsistent with the new VSL Development Guidelines. In fact, we believe there are many instances where the existing levels of Non-Compliance were used and result in VSL's inconsistent with the VSL Development Guidelines (specific examples are listed in the matrix in Question 3, but many VSL's need to be modified). This approach is improper and would not result in an overall set of consistent VSL 's. The existing levels of Non-Compliance should only be used if they are consistent with the VSL Development Guidelines.</p>
<p>Response: The VSL DT thanks you for your requirement. The reporting example is for a requirement that specifies a timing requirement. The generic text for reporting provides a guideline for illustration. The Standards Drafting Teams will develop specific VSLs based on the content of the requirement as well as the guideline. The SDT will also develop the distinction between "minor" and "significant" elements for the VSL. Existing levels of non-compliance are intended to be used in conjunction with the guidelines during this initial VSL development. We have attempted to develop VSLs within the guidelines and incorporate the Levels of Non-compliance to remain consistent with the guideline.</p>			
SOCO Gen	<input checked="" type="checkbox"/>		<p>SCGen is concerned about the ambiguity associated with the terms "minor" and "significant". Specifically, SCGen is concerned that "minor" and "significant" are not defined terms and are not clearly differentiated within either the VSLs for the standards or even the Reliability Standard Audit Worksheets (RSAWs) where such worksheets exist. Therefore, SCGen is concerned that "minor" and "significant" will be subjectively determined by the audit team. Rather, the VLS guideline document should be very specific about how "minor" and "significant" will be determined. SCGen recommends that the VLS guideline clearly require "minor" and "significant" to be established within the VSLs and that such determinations be consistent with the RSAWs - where such RSAWs exist.</p> <p>Furthermore, no "violation" should be assigned unless there is a clear violation that would impact reliability. There can be "non-compliances" that do not impact reliability and should not be classified as a "violation." This appears to be a source of confusion when looking at the VSL Development Guidelines Criteria and their application to some of the standard requirements. For example, some of the language categorized as Lower VSLs indicates compliance, or the intent of the requirement has been met but is missing (or deficient with respect to) minor details (i.e., no clear violation).</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.</p>			
<p>VSLs are not considered unless a violation has occurred. If there are requirements that do not impact reliability and should be retired, the VSL DT invites you to create a SAR to remedy the situation.</p>			
SPP ORWG	<input checked="" type="checkbox"/>		<p>In our comments we have made several references to the generic, subjective language proposed in the VSLs. While the use of such language does not overly concern us in the generic definitions contained on page 8 of the guideline document, it does cause concern when we repeatedly see that same generic language used in VSLs for specific requirements. Perhaps we our fears would be somewhat relieved if</p>

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Commenter	Yes	No	Comment
			the SDT could tell us, for example, what distinguishes 'minor' and 'significant' elements. While the SDT may have a clear understanding of the use of these terms, it is critical that the industry and especially audit teams know the difference.
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.</p>			
WAPA	<input checked="" type="checkbox"/>		Many of the VSLs have what we would classify as ill defined or ambiguous terms used in the definition. It's not the fault of the drafters but the inherent ambiguity of the standards. When terms such as, mostly, partially, substantially, minor, significant, substantial etc are used there remains the possible subjectivity of determining where the violation falls. The issue is that the present standards do not lend themselves to having solid numbers or figures to use in developing VSLs so another approach needed to be made.
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept.</p>			
WECC LRS	<input checked="" type="checkbox"/>		Zero-tolerance for compliance errors that are not just minor but are characterized as having no impact on the achievement of the objective of the requirement (e.g. the drafting team's proposed VSL for MOD-0160-1, R1) is excessive. These failures to comply have no impact on reliability and are unnecessary, at the least. This is especially true for procedural requirements that apply to planning and not operations. Several of our proposed changes modify the lower level VSLs to create some slack between absolute compliance and minor non-compliance to avoid penalties for insignificant non-compliance.
<p>Response: The VSL DT thanks you for your comment. VSLs are not considered unless a violation has occurred. If there are requirements that do not impact reliability and should be retired, the VSL DT invites you to create a SAR to remedy the situation.</p>			
WECC RCCWG	<input checked="" type="checkbox"/>		<p>The WECC RCCWG believes that if there is current substantial compliance to a requirement, there should be a finding of compliance even if there are different interpretations of minor details. The work group believes that required details must be specifically listed clear requirements, without room for interpretation. It should be very clear what violation severity level will be assessed in cases of non-compliance.</p> <p>The WECC RCCWG disagrees that an explanatory requirement can result in a finding of non-compliance. Therefore, there should be no violation severity limit placed on explanatory text.</p> <p>The work group suggests that the NERC standards requirements be reviewed by technical writing professionals to verify the measurability and consistency in development methodology (one multi-component requirement versus a parent requirement with multiple sub-requirements) of each.</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT used these terms in the general guidelines document to allow the standards development teams to specify which elements are "minor" or "significant". The VSL DT does not envision that these terms will be</p>			

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Commenter	Yes	No	Comment
<p>used in VSLs during the on-going Standards Development Process. The VSL DT feels that the best way to develop VSLs is when the standards are being revised such that the requirements, the Violation Risk Factors, the measurements and the VSLs are all done by the same team of experts. It is envisioned that standards drafting teams will revise VSLs that specifically identify what "minor" or "significant" elements are for each requirement. The VSL DT has modified the guideline document to reflect this concept. Based on comments from stakeholders, the VSL DT has reviewed all requirements listed as Explanatory Text to see whether another category was more appropriate. These categories and VSLs were modified accordingly.</p>			
Ameren (2)		<input checked="" type="checkbox"/>	
WECC OTS		<input checked="" type="checkbox"/>	
WECC PWG		<input checked="" type="checkbox"/>	No comment.
Uninet		<input checked="" type="checkbox"/>	
SOCO Trans		<input checked="" type="checkbox"/>	No comment.
SERC RRS		<input checked="" type="checkbox"/>	
PPL		<input checked="" type="checkbox"/>	No comment.
NCMPA		<input checked="" type="checkbox"/>	No comment.
NU		<input checked="" type="checkbox"/>	
KCPL		<input checked="" type="checkbox"/>	
Entergy (2)		<input checked="" type="checkbox"/>	
ATC		<input checked="" type="checkbox"/>	No comment.

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3. Please review all of the Violation Severity Levels for all of the 83 regulatory approved standards. Then in the following tables, please provide alternate language for any VSL that you disagree with.

Summary Consideration: The VSL DT thanks all of the commenters for their suggested revisions to the VSLs. The team has not responded to each individual comment in the table below, but has taken each into account during our revisions to the VSLs. The DT has revised the VSLs to make them more specific based on comments received from stakeholders. Many of the VSLs revisions in the table below are excellent and have been used to replace generic VSLs where appropriate. The VSL DT has removed generic language and removed terms such as "minor" and "significant" from the VSLs.

Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
Entergy (2)	BAL-001-0	R3.	This requirement is explanatory of how BAL-001 R1 is computed. All explanatory requirements that have a risk factor assigned to them shall have a VSL of Lower assigned to them.			
WECC PWG	BAL-001-0	R3.	N/A	The responsible entity has implemented the requirement but execution failures have occurred that prevented the entity from meeting the objectives of the requirement.	The responsible entity has failed to demonstrate implementation or execution of the program/procedure requirement or directive	N/A
Entergy (2)	BAL-001-0	R4.	This requirement is explanatory as to whether an entity is subject to CPS evaluation. All explanatory requirements that have a risk factor assigned to them shall have a VSL of Lower assigned to them.			
Entergy (2)	BAL-002-0	R1.	Access to contingency reserves < 75% or required value. (Except for	Access to contingency reserves < 50% or required value. (Except	Access to contingency reserves < 25% or required value. (Except	Access to contingency reserves was not available. (Except for time permitted

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			time permitted for recovery in BAL-002 R 6.1)	for time permitted for recovery in BAL-002 R 6.1)	for time permitted for recovery in BAL-002 R 6.1)	for recovery in BAL-002 R 6.1)
AEP	BAL-002-0	R1.1.				The Responsible Balancing Authority Entity has elected to fulfill its Contingency Reserve obligations by participating as a member of a Reserve Sharing Group and the Reserve Sharing Group has not provided the same reliability criteria for the responsibilities and obligations as required of the responsible entity with respect to monitoring and meeting the requirements of Standard BAL-002.
Entergy (2)	BAL-002-0	R1.1.	This requirement is explanatory as to the obligations of a Reserve Sharing group. All explanatory requirements that have a risk factor assigned to them shall have a VSL of Lower assigned to them.			
JEA	BAL-002-0	R1.1.				This would be an explanatory requirement for the BA and the RSG IS the responsible entity.
SPP ORWG	BAL-002-0	R3.	The responsible entity failed to meet the DCS requirement for one reportable event.	The responsible entity failed to meet the DCS requirement for two reportable events.	The responsible entity failed to meet the DCS requirement for three reportable events.	The responsible entity failed to meet the DCS requirement for four or more reportable events.
Entergy (2)	BAL-002-0	R3.1.				this should be N/A since it is duplicative of R1
Entergy (2)	BAL-002-0	R6.	The responsible entity restored less than 100% but greater than 75% of	The responsible entity restored less than 75% but greater than 50% of	The responsible entity restored less than 50% but greater than 25% of	The responsible entity restored less than 25% of its contingency reserves

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			its contingency reserves during the Contingency Reserve Restoration Period.	its contingency reserves during the Contingency Reserve Restoration Period.	its contingency reserves during the Contingency Reserve Restoration Period.	during the Contingency Reserve Restoration Period.
KCPL	BAL-003-0	R1.	The responsible entity failed to review and recalculate its frequency bias setting by January 1 of each year.	N/A	N/A	N/A
PJM	BAL-003-0	R1.	-	-	Each BA did review its Frequency Bias Settings by January 1, but did not recalculate its setting to reflect any change in the Frequency Response of the BA Area.	Each BA did not review its Frequency Bias Settings by January 1 and did not recalculate its setting to reflect any change in the Frequency Response of the BA Area.
WECC PWG	BAL-003-0	R1.	The Responsible Entity does not review and recalculate its Frequency Bias setting by January 1 of each year	N/A	N/A	N/A
WECC PWG	BAL-003-0	R1.2.	The Responsible entity has failed to report the Frequency bias setting OR the method for determining the setting	The Responsible entity has failed to report the Frequency bias setting AND the method for determining the setting	N/A	N/A
WECC PWG	BAL-003-0	R2.1.	N/A	The fixed frequency bias maintained by the responsible entity was not based on the average frequency response of several on-peak disturbances demand.	N/A	N/A
WECC PWG	BAL-003-0	R2.2.	N/A	The variable frequency bias maintained by the responsible entity is not based on an analyses of Frequency Response as it varies with factors such as load , generation,	N/A	N/A

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				governor characteristics, and frequency.		
WECC PWG	BAL-003-0	R3.	N/A	AGC was not operated on Tie Line Frequency Bias even when such operation was not adverse to system or interconnection reliability.	N/A	N/A
WECC PWG	BAL-003-0	R4.	Balancing Authorities that use Dynamic Scheduling or Pseudoties for jointly owned units did not reflect their respective share of the unit governor droop response in their respective Frequency Bias Setting.	N/A	N/A	N/A
WECC PWG	BAL-003-0	R4.1.	The Balancing Authority (A) that contains the Jointly Owned Unit with fixed schedules did not incorporate the respective share of the unit governor droop response for any Balancing Authorities that have fixed schedules (B and C).	N/A	N/A	N/A
WECC PWG	BAL-003-0	R4.2.	The Balancing Authorities that have a fixed schedule (B and C) but do not contain the Jointly Owned Unit included their share of the governor droop response in their Frequency Bias Setting.	N/A	N/A	N/A
WECC PWG	BAL-003-0	R5.	N/A	The frequency bias maintained by the responsible entity is not at least one percent of	N/A	N/A

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				the estimated yearly peak demand.		
WECC PWG	BAL-003-0	R5.1.	N/A	The frequency bias maintained by the responsible entity is not at least one percent of the estimated maximum generation level.	N/A	N/A
WECC PWG	BAL-003-0	R6.	N/A	A Balancing Authority that is performing Overlap Regulation Service did not increase its Frequency Bias Setting to match the frequency response of the entire area being controlled OR A Balancing Authority changed its Frequency Bias Setting while performing Supplemental Regulation	N/A	N/A
PJM	BAL-004-0	R1.	N/A - R1 is currently being balloted and will be only an explanatory statement.	N/A - R1 is currently being balloted and will be only an explanatory statement.	N/A - R1 is currently being balloted and will be only an explanatory statement.	N/A - R1 is currently being balloted and will be only an explanatory statement.
PJM	BAL-004-0	R2.	R2 is currently being balloted to be removed.	R2 is currently being balloted to be removed.	R2 is currently being balloted to be removed.	R2 is currently being balloted to be removed.
Dominion	BAL-005-0	R1.1.				Requirement applicable to GO/LSE should be included in Interconnection Agreement, not NERC standards. If in standards, should not warrant severe VSL unless transmission provider or distribution provider has provided

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						notice that facilities are not included and entity has failed to take action within 60 days.
Entergy (2)	BAL-005-0	R1.1.	The Generator Operator with generation facilities operating in an Interconnection failed to ensure that those generation facilities were included within its metered boundaries of a Balancing Authority Area.			n/a
SPP ORWG	BAL-005-0	R1.1.	The responsible entity's implementation/execution has resulted in meeting the intent of the requirement but the entity's execution failed to include one meter amounting to the lesser of 1 MW or 1% of the entity's generation capacity within the metered boundaries of a Balancing Authority Area.	The responsible entity's implementation/execution is mostly compliant with the requirement but the entity's execution failed to include two meters amounting to the lesser of 5 MW or 5% of the entity's generation capacity within the metered boundaries of a Balancing Authority Area.	The responsible entity's implementation/execution is partially compliant with the requirement but the entity's execution failed to include three meters amounting to the lesser of 10 MW or 10 % of the entity's generation capacity within the metered boundaries of a Balancing Authority Area.	The responsible entity's implementation/execution has failed to demonstrate implementation or execution of the requirement by having four or more meters amounting to the lesser of 20 MW or 20% of the entity's generation capacity outside the metered boundaries of a Balancing Authority Area.
SPP ORWG	BAL-005-0	R1.2.	The responsible entity's implementation/execution has resulted in meeting the intent of the requirement but the entity's execution failed to include one transmission facility within the metered boundaries of a Balancing Authority Area.	The responsible entity's implementation/execution is mostly compliant with the requirement but the entity's execution failed to include two transmission facilities within the metered boundaries of a Balancing Authority Area.	The responsible entity's implementation/execution is partially compliant with the requirement but the entity's execution failed to include three transmission facilities within the metered boundaries of a Balancing Authority Area.	The responsible entity's implementation/execution has failed to demonstrate implementation or execution of the requirement by having four or more transmission facilities outside the metered boundaries of a Balancing Authority Area.
Entergy (2)	BAL-005-0	R1.3.	The Load-Serving Entity with load operating in an Interconnection failed to ensure that those loads were included within its metered boundaries of a			n/a

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			Balancing Authority Area.			
SPP ORWG	BAL-005-0	R1.3.	The responsible entity's implementation/execution has resulted in meeting the intent of the requirement but the entity's execution failed to include one meter amounting to the lesser of 1 MW or 1% of the entity's load within the metered boundaries of a Balancing Authority Area.	The responsible entity's implementation/execution is mostly compliant with the requirement but the entity's execution failed to include two meters amounting to the lesser of 5 MW or 5% of the entity's load within the metered boundaries of a Balancing Authority Area.	The responsible entity's implementation/execution is partially compliant with the requirement but the entity's execution failed to include three meters amounting to the lesser of 10 MW or 10 % of the entity's load within the metered boundaries of a Balancing Authority Area.	The responsible entity's implementation/execution has failed to demonstrate implementation or execution of the requirement by having four or more meters amounting to the lesser of 20 MW or 20% of the entity's load outside the metered boundaries of a Balancing Authority Area.
WECC PWG	BAL-005-0	R10.	N/A		The Balancing Authority failed to include all Dynamic in the calculation of Net Scheduled Interchange for the ACE equation	
KCPL	BAL-005-0	R11.	The Balancing Authority failed to include the effect of Ramp rates in the Scheduled Interchange values to calculate ACE.	N/A		
WECC PWG	BAL-005-0	R12.1.			The Balancing Authority failed to ensure Tie Line MW metering was telemetered to both control centers, and emanates from a common, agreed upon source using common primary metering equipment AND the Balancing Authority failed to ensure that megawatt-hour data is telemetered or reported at the end of each hour	
WECC PWG	BAL-005-0	R14.	The Balancing Authority failed to provide its operating personnel with	The Balancing Authority failed to provide its operating personnel with	The Balancing Authority failed to provide its operating personnel with	

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			one of the following: ACE, Interconnection frequency, and Net Actual Interchange with each Adjacent Balancing Authority Area	two of the following: ACE, Interconnection frequency, and Net Actual Interchange with each Adjacent Balancing Authority Area.	all of the following: ACE, Interconnection frequency, and Net Actual Interchange with each Adjacent Balancing Authority Area.	
KCPL	BAL-005-0	R15.		N/A	The Balancing Authority failed to provide adequate and reliable backup power supplies and shall periodically test these supplies at the Balancing Authority's control center and other critical locations to ensure continuous operation of AGC and vital data recording equipment during loss of the normal power supply.	
WECC PWG	BAL-005-0	R16.	The Balancing Authority failed to sample data at least at the same periodicity with which ACE is calculated OR the Balancing Authority failed to flag missing or bad data for operator display and archival purposes			
Entergy (2)	BAL-005-0	R2.	n/a (this is duplicative of the requirements of BAL-001)			
WECC PWG	BAL-005-0	R2.	N/A			Responsible Entity failed to maintain Regulating Reserve that can be controlled by AGC to meet Control Performance Standard
KCPL	BAL-005-0	R3.		N/A	The Balancing Authority providing Regulation Service failed to provide	

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					adequate metering, communications and control equipment.	
KCPL	BAL-005-0	R5.		N/A	The Balancing Authority receiving Regulation Service failed to ensure that back-up plans were in place to provide replacement Regulation Service.	
WECC PWG	BAL-005-0	R5.		N/A	The Balancing Authority receiving Regulation Service failed to ensure that back up plans were in place to provide replacement Regulation Service	
WECC PWG	BAL-005-0	R6.	N/A		The Balancing Authority failed to notify the Reliability Coordinator within 30 minutes of its inability to calculate ACE.	
WECC PWG	BAL-005-0	R7.	N/A			The Balancing Authority failed to operate AGC continuously when there were no adverse impacts OR if their AGC was inoperative the Balancing Authority failed to use manual control to adjust generation to maintain the Net Scheduled Interchange.
WECC PWG	BAL-005-0	R8.	N/A		The Balancing Authority failed to ensure that data acquisition for and calculation of ACE occurred at least every six seconds	
PJM	BAL-005-0	R8.1.	Frequency data was available less than	Frequency data was available less than 98%	Frequency data was available less than 96%	Frequency data was available less than 94% of

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			99.95% of the time, but greater than 98% of the time.	of the time, but greater than 96% of the time.	of the time, but greater than 94% of the time.	the time.
WECC PWG	BAL-005-0	R9.1.	Text of this requirement is exclusively explanatory. All explanatory Requirements that have a risk factor assigned to them shall have a VSL of Lower assigned to them	N/A	N/A	N/A
JEA	CIP-001-1	R1.	This standard provides for having procedures. An entity either has them, or they don't. There are no "minor details" required by the standard to be missing.	If an entity is missing procedures for either recognizing or making personnel aware of sabotage events the procedure would not be substantially meeting the objectives of this requirement. So there should be no Moderate VSL either.	The responsible entities procedures do not cover either recognition of or making its operating personnel aware of sabotage events.	The responsible entity does not have any procedures for the recognition of and for making its operating personnel aware of sabotage events.
KCPL	CIP-001-1	R1.	The responsible entity has demonstrated the existence of procedures for the recognition of and for making their operating personnel aware of sabotage events but it is missing minor administrative or procedural details.	The responsible entity has demonstrated the existence of procedures for the recognition of and for making their operating personnel aware of sabotage events but the procedure fails to satisfy one significant element.	The responsible entity demonstrated the existence of procedures for the recognition of and for making their operating personnel aware of sabotage events but the procedure fails to satisfy more than one significant element.	The responsible entity has failed to demonstrated the existence of procedures for the recognition of and for making their operating personnel aware of sabotage events.
NU	CIP-001-1	R1.	Concerned what is meant by minor details.	Concerned what is meant by significant element.	Concerned what is meant by significant element.	OK
SOCO Gen	CIP-001-1	R1.	Per RSAW, the responsible party has demonstrated the existence of a procedure to recognize a sabotage	Per RSAW, the responsible party has demonstrated the existence of a procedure to recognize a sabotage	N/A (note: there is only one substantive element, so non-compliance means non-compliance with the entire	Per RSAW, the responsible entity has failed to demonstrate the existence of a procedure to recognize a sabotage

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			event, but the procedure only notifies a subset of the appropriate operating personnel (presumes "partial" notification is "minor")	event, but the procedure does not have specific steps to notify operating personnel	requirement)	event.
JEA	CIP-001-1	R2.	Again, either the procedure exists, or it does not.	N/A	N/A	The responsible entity does not have procedures or guidelines for the communication of information concerning sabotage events to appropriate parties in the Interconnection.
KCPL	CIP-001-1	R2.	The responsible entity has demonstrated the existence of procedures for communication of information concerning sabotage events to appropriate parties in the Interconnection but it is missing minor administrative or procedural details.	The responsible entity has demonstrated the existence of procedures for communication of information concerning sabotage events to appropriate parties in the Interconnection but the procedure fails to satisfy one significant element.	The responsible entity demonstrated the existence of procedures for communication of information concerning sabotage events to appropriate parties in the Interconnection but the procedure fails to satisfy more than one significant element.	The responsible entity has failed to demonstrate the existence of procedures for communication of information concerning sabotage events to appropriate parties in the Interconnection.
NU	CIP-001-1	R2.	Concerned what is meant by minor details.	Concerned what is meant by significant element.	Concerned what is meant by significant element.	OK
SOCO Gen	CIP-001-1	R2.	Per RSAW, the responsible party has demonstrated the existence of a procedure to communicate information, but not all appropriate personnel have been identified (presumes "partial" notification is "minor").	N/A (note: there is only one substantive element, so non-compliance means non-compliance with the entire requirement)	N/A (note: there is only one substantive element, so non-compliance means non-compliance with the entire requirement)	Per RSAW, the responsible entity has failed to demonstrate the existence of a procedure to communicate information to appropriate personnel in the interconnection.
JEA	CIP-001-1	R3.	All but a few of operating personnel were not provided with the	While the responsible entity has not provided procedures to some of its	While the responsible entity has provided procedures to some of its	The responsible entity has not provided any of its operating personnel with

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			procedures.	operating personnel, enough have been provided with procedures or guidelines that the entity substantially meets the reliability objectives of the requirement	operating personnel, enough have not been provided with procedures or guidelines that the entity does not substantially meet the reliability objectives of the requirement.	sabotage response procedures or guidelines.
NU	CIP-001-1	R3.	Concerned what is meant by minor details.	Concerned what is meant by significant element.	OK	OK
SOCO Gen	CIP-001-1	R3.	Per RSAW, the responsible party has demonstrated the existence of a response guideline, but the guideline did not have all the appropriate contacts (presumes "partial" contact list is "minor").	Per RSAW, the responsible party has demonstrated the existence of a response guideline, but the guideline did not have any of the appropriate contacts or was not available to operating personnel.	Per RSAW, the responsible party has demonstrated the existence of a response guideline, but the guideline did not have all the appropriate contacts and it was not available to operating personnel.	Per RSAW, the responsible entity has failed to demonstrate the existence of a sabotage response guideline.
SPP ORWG	CIP-001-1	R3.	The responsible entity has demonstrated the existence of the required procedure/program but is missing minor details or minor program/procedural elements. Such deficiencies would not impact the achievement of the objective of the requirement.	The responsible entity has demonstrated the existence of the required procedure/program and is mostly compliant with the Requirement but fails to satisfy at least one significant element.	The responsible entity is partially compliant with the requirement and fails to satisfy more than one significant element.	The responsible entity has failed to demonstrate the existence of the program, procedure, protocol, or guidance document required.
JEA	CIP-001-1	R4.	The responsible entity has established communications with the local FBI/RCMP and has developed some reporting procedures, but there are minor appropriate circumstances for which no procedure was	The responsible entity has established communications with the local FBI/RCMP and has developed some reporting procedures, but there are significant appropriate circumstances for which no procedure was	The responsible entity has established communications with the local FBI/RCMP but has not developed reporting procedures as appropriate.	The responsible entity has not established communications contacts with the local FBI/RCMP.

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			developed.	developed.		
NU	CIP-001-1	R4.	Concerned what is meant by minor details.	Concerned what is meant by significant element.	Concerned what is meant by significant element.	OK
SOCO Gen	CIP-001-1	R4.	N/A (note: there are no "minor" violations to this requirement)	Per RSAW, the responsible party has a contact list without procedures OR has procedures without a contact list.	N/A (note: there are only two substantive elements, so non-compliance with both means non-compliance with the entire requirement)	Per RSAW, the responsible entity has failed to demonstrate the existence of the appropriate contact list or reporting procedures.
Avista	COM-001-1	R1.	The responsible entity is non-compliant with 25% of the sub-components	The responsible entity is non-compliant with 50% of the sub-components	The responsible entity is non-compliant with 75% of the sub-components	The responsible entity is non-compliant with 100% of the sub-components
JEA	COM-001-1	R1.	This doesn't make sense. Each of R1.1-1.4 should be treated as a separate requirement for the purpose of assigning VSL's.	N/A	N/A	N/A
KCPL	COM-001-1	R1.	The responsible entity telecommunications is not redundant or diversly routed where required by other operating entities for the exchange of interconnection or operating data.	The responsible entity has failed to establish telecommunications 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 has failed to establish telecommunications with its Reliability Coordinator, its Transmission Operators, or its Balancing Authorities for the exchange of interconnection or operating data needed to maintain BES reliability.	The responsible entity has failed to establish telecommunications information for interconnection or operating data internally and with any Reliability Coordinator, Transmission Operator, or Balancing Authority needed to maintain BES reliability.
JEA	COM-001-1	R1.1.		Refer to whether the entity substantially meets the objectives rather than the number of "significant" elements.	Refer to whether the entity substantially meets the objectives rather than the number of "significant" elements.	
JEA	COM-001-1	R1.2.		Refer to whether the entity substantially meets the objectives rather than the number of	Refer to whether the entity substantially meets the objectives rather than the number of	

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				"significant" elements.	"significant" elements.	
JEA	COM-001-1	R1.3.		Refer to whether the entity substantially meets the objectives rather than the number of "significant" elements.	Refer to whether the entity substantially meets the objectives rather than the number of "significant" elements.	
JEA	COM-001-1	R1.4.		Refer to whether the entity substantially meets the objectives rather than the number of "significant" elements.	Refer to whether the entity substantially meets the objectives rather than the number of "significant" elements.	
Avista	COM-001-1	R2.	What are the sub-components?	What are the sub-components	What are the sub-components	What are the sub-components
KCPL	COM-001-1	R2.	N/A	The responsible entity has failed to manage, test, or monitor its emergency telecommunications facilities	The responsible entity has failed to manage, test, or monitor its primary telecommunications facilities.	The responsible entity has failed to manage, test or monitor its primary or its emergency telecommunications facilities.
Avista	COM-001-1	R3.	What are the sub-components	What are the sub-components	What are the sub-components	What are the sub-components
KCPL	COM-001-1	R3.	The responsible entity has failed to coordinate telecommunications within their respective areas less than 100% but greater than 75% with other operating entities.	The responsible entity has failed to coordinate telecommunications within their respective areas less than 75% but greater than 50% with other operating entities.	The responsible entity has failed to coordinate telecommunications within their respective areas less than 50% but greater than 25% with other operating entities.	The responsible entity has failed to coordinate telecommunications within their respective areas less than 25% with other operating entities.
JEA	COM-001-1	R5.	Again, either the procedure exists, or it does not.		There are no written operating instructions or procedures to enable continued operation of the system during the loss of telecommunications facilities.	
JEA	COM-001-1	R6.	This is not multi-component, it is implementation of a	The responsible entity did not follow the NERCNet Security Policy	The responsible entity did not follow the NERCNet Security Policy	The responsible entity does not show that any effort was made to follow

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			policy and should be based on substantial compliance per the implementation guidance.	in one or more significant matters, but was in substantial compliance with the objectives of the policy.	in one or more significant matters, and was not in substantial compliance with the objectives of the policy	the NERCNet Security Policy.
KCPL	COM-001-1	R6.	The responsible entity's program/procedure is non-compliant with respect to one or more minor details.	The responsible entity's program/procedure is non-compliant with respect to one significant element.	The responsible entity's program/procedure is non-compliant with respect to two or more significant elements.	The responsible entity's program/procedure is non-compliant with the requirement.
KCPL	COM-002-2	R1.	N/A	N/A	The responsible entity staffed established voice and data links with appropriate entities, but failed to notify other operating entities of a reliability related operating condition including anticipation of load shedding.	The responsible entity failed to staff established voice and data links with appropriate entities and failed to notify other operating entities of a reliability related operating condition including anticipation of load shedding.
SOCO Gen	COM-002-2	R1.	See General Comment #3 under question 4. Alternate VSL language based upon an "implement" type rather than a "multi-component" type: The responsible party has appropriate communications in place, but does not have the appropriate list of RCs, BAs, and TOs. (presumes an interpretation of "minor"	See comment on "minor". Alternate language: The responsible party is missing one of the following elements in their communications implementation: Voice Link, Data Link, communications are not properly staffed, communications are not available for addressing a real-time emergency.	See comment on "minor". Alternate language: The responsible party is missing two or more of the following elements in their communications implementation: Voice Link, Data Link, communications are not properly staffed, communications are not available for addressing a real-time emergency.	See comment on "minor". Alternate language: The responsible party has not implemented a communications and coordination system.
Chelan	COM-002-2	R2	N/A (there are 3 subcomponents 25% or less is not an option).	The responsible entity failed to comply with one (1) of the sub-components.	The responsible entity failed to comply with two (2) of the sub-components.	The responsible entity has failed to comply with all three (3) of the sub-components.
KCPL	COM-002-	R2.	N/A	The responsible entity provided a clear directive	The responsible entity provided a clear directive	The responsible entity did not provide a clear

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
	2			and required the recipient to repeat the directive, but did acknowledge the recipient was correct in the repeated directive.	but did not require the recipient to repeat the directive.	directive and did not require the recipient to repeat the directive.
Entergy (2)	EOP-001-0	R1.		n/a	n/a	The responsible entity has demonstrated the existence of the required operating agreement and is mostly compliant with the Requirement but fails to have an agreement at least one adjacent BA.
KCPL	EOP-001-0	R1.	The responsible entity has demonstrated the existence of the required operating agreement but is missing minor details or minor program/procedural elements.			
KCPL	EOP-001-0	R2.	The responsible entity has demonstrated the existence of the required procedure/program but is missing minor details or minor program/procedural elements.			
JEA	EOP-001-0	R3.	Treat each of R3.1-3.4 as a separate requirement for the purposes of VSL. N/A	N/A	N/A	N/A
JEA	EOP-001-0	R4.	Treat each of R4.1-4.4 as a separate requirement for the purposes of VSL. All of these requirements are Procedure requirements, not implementation. N/A			

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
JEA	EOP-001-0	R4.1.		The responsible entity's emergency plan is substantially compliant with the requirement but fails to include one or more communication protocol.	The responsible entity's emergency plan fails to include one or more communication protocol and does not substantially meet the objectives of the requirement.	
JEA	EOP-001-0	R4.2.	Again, either the procedure exists, or it does not. N/A	N/A	The responsible entity did not include load reduction in its list of controlling actions...	The responsible entity failed to include a list of controlling actions...
JEA	EOP-001-0	R4.3.	Again, either the procedure exists, or it does not. N/A	N/A	N/A	The entity's emergency plans do not include the tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.
JEA	EOP-001-0	R4.4.	Again, either the procedure exists, or it does not. N/A	N/A	N/A	The entity's emergency plans do not include staffing levels for emergencies.
KCPL	EOP-001-0	R6.	N/A	The responsible entity performed an annual review of its emergency plans and updated the plans as needed, but failed to provide a copy of its emergency plans to its Reliability Coordinator, or its neighboring Transmission Operators or Balancing Authorities.	The responsible entity performed an annual review of its emergency plans, but failed to update its emergency plans as needed.	The responsible entity failed to perform an annual review of its emergency plans and failed to update its emergency plans as needed.
JEA	EOP-001-0	R7.	Treat each of R4.1-4.4 as a separate requirement for the purposes of VSL. N/A	N/A	N/A	N/A
JEA	EOP-001-0	R7.1.		The responsible entity has established and maintained reliable communication between	The responsible entity has established and maintained reliable communication between	

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				all but one or more interconnected systems, but was substantially compliant with the objectives of this requirement.	all but one or more interconnected systems, and was not substantially compliant with the objectives of this requirement.	
JEA	EOP-002-2	R6.	Treat each of R6.1-6.6 as a separate requirement for the purposes of VSL. N/A			
Entergy (2)	EOP-002-2	R6.1.	The responsible entity failed to load available generating capacity to meet the requirement	n/a	n/a	n/a
Entergy (2)	EOP-002-2	R6.2.	The responsible entity failed to deploy available operating reserve to meet the requirement	n/a	n/a	n/a
Entergy (2)	EOP-002-2	R6.3.	The responsible entity failed to interrupt available interruptible load load/export to meet the requirements	n/a	n/a	n/a
Entergy (2)	EOP-002-2	R6.4.	The responsible entity failed to request assistance from other BAs to meet the requirement	n/a	n/a	n/a
Entergy (2)	EOP-002-2	R6.5.	The responsible entity failed to declare an EEA	n/a	n/a	n/a
Entergy (2)	EOP-002-2	R6.6.	The responsible entity failed to reduce load to meet the requirement	n/a	n/a	n/a
JEA	EOP-002-2	R7.	Treat each of R7.1-7.2 as a separate requirement for the purposes of VSL. N/A			

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
Entergy (2)	EOP-002-2	R7.1.	The responsible entity failed to reduce load to meet the requirement	n/a	n/a	n/a
Entergy (2)	EOP-002-2	R7.2.	The responsible entity failed to declare an EEA	n/a	n/a	n/a
KCPL	EOP-002-2	R8.	The responsible entity failed to issue an Energy Emergency Alert level 0 to notify operating entities of a termination of an energy emergency operating condition.	The responsible entity failed to issue an Energy Emergency Alert level 1 and failed to take mitigating action.	The responsible entity failed to issue an Energy Emergency Alert level 2 and failed to take mitigating action.	The responsible entity failed to issue an Energy Emergency Alert level 3 and failed to take mitigating action.
Dominion	EOP-002-2	R9.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
JEA	EOP-002-2	R9.	Treat each of R9.1-9.4 as a separate requirement for the purposes of VSL. N/A			
KCPL	EOP-002-2	R9.	The responsible entity failed to meet the requirements with one of the sub-requirements.	The responsible entity failed to meet the requirements with two of the sub-requirements.	The responsible entity failed to meet the requirements with three of the sub-requirements.	The responsible entity failed to meet the requirements of all the sub-requirements.
Dominion	EOP-002-2	R9.1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	Who determines? In many RTOs, the LSE doesn't know when deficient.
JEA	EOP-003-1	R2.	Either the procedure exists, or it does not. N/A	N/A	N/A	
JEA	EOP-003-1	R4.	Since only one factor is required, either at least one factor was considered, or none were. N/A	N/A	N/A	The responsible entity has failed to consider any of the required factors in designing an automatic load shedding scheme.
SOCO Gen	EOP-004-1	R2.	N/A (see general comment 4 under item 4)	N/A (see general comment 4 under item 4)	N/A (see general comment 4 under item 4)	The responsible party did not perform a disturbance

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						analysis.
Dominion	EOP-004-1	R3.				Does not warrant severe VSL
KCPL	EOP-004-1	R3.	N/A	N/A	The responsible entity provided a report of a disturbance or unusual occurrence, but failed to report within the time frame required by the sub-requirements.	The responsible entity failed to provide a report of a disturbance or unusual occurrence.
SOCO Gen	EOP-004-1	R3.	N/A (See general comment 5 under item 4.)	N/A (See general comment 5 under item 4.)	N/A (See general comment 5 under item 4.)	N/A (See general comment 5 under item 4.)
SOCO Gen	EOP-004-1	R3.1.	See general comment 5 under item 4. Alternate language: The responsible entity provided the reports in a timely manner with minor exceptions (e.g, OE-417 Form not used) and substantially meets the intent of the requirement.	See general comment 5 under item 4. The responsible entity provided the required reports with some deficiency such as submission occurred later than 24 hours but not more than 36 hours.	See general comment 5 under item 4. The responsible entity provided the required reports but was significantly deficient in meeting timeliness requirement by more than 36 hours but less than 48 hours.	See general comment 5 under item 4. The responsible entity failed to report within 48 hours.
SOCO Gen	EOP-004-1	R3.3.	N/A	The responsible party made a verbal report but failed to provide periodic, timely updates	The responsible party made timely, periodic verbal reports, but did not follow up with a written preliminary report.	The responsible party did not make a verbal or preliminary written report at all.
SOCO Gen	EOP-004-1	R3.4.	The responsible entity file a final report, but did not do so within the 60 day timeframe.	The responsible entity filed a final report, but the report was mission one of the following elements: discussion of events, cause, conclusions, or recommendations.	The responsible entity filed a final report, but the report was mission two or more of the following elements: discussion of events, cause, conclusions, or recommendations.	The responsible entity failed to file a final report.
PJM	EOP-005-1	R10.	The Transmission Operator only demonstrated through	The Transmission Operator only demonstrated through	The Transmission Operator only demonstrated through	The Transmission Operator did not demonstrate through

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			simulation or testing that between 67-99% of the blackstart generating units in its restoration plan can perform their intended functions as required in the regional restoration plan.	simulation or testing that between 33-66% of the blackstart generating units in its restoration plan can perform their intended functions as required in the regional restoration plan.	simulation or testing that less than 33% of the blackstart generating units in its restoration plan can perform their intended functions as required in the regional restoration plan.	simulation or testing that all the blackstart generating units in its restoration plan can perform their intended functions as required in the regional restoration plan.
KCPL	EOP-005-1	R2.	The responsible entity has demonstrated the existence of the required procedure/program but is missing minor details or minor program/procedural elements.			
PJM	EOP-005-1	R6.	Entity only trained 67% to 99% of its operating personnel in the implementation of the restoration plan.	Entity only trained 33% to 66% of its operating personnel in the implementation of the restoration plan.	Entity only trained less than 33% of its operating personnel in the implementation of the restoration plan.	Entity did not train any of its operating personnel in the implementation of the restoration plan.
AEP	EOP-009-0	R1.	Startup and operation testing of each blackstart generating unit was performed, but the required testing records were incomplete.	N/A	Startup and operation testing of each blackstart generating unit was not performed (unless an exception was provided for a specific unit by the RRO).	N/A
Dominion	EOP-009-0	R1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
PJM	EOP-009-0	R1.	The GOP of each blackstart generating unit tested between 67-99% of the startup and operation of the system blackstart generating units identified in the BCP as required in the Regional BCP (Reliability	The GOP of each blackstart generating unit tested between 33-66% of the startup and operation of the system blackstart generating units identified in the BCP as required in the Regional BCP (Reliability	The GOP of each blackstart generating unit tested less than 33% of the startup and operation of the system blackstart generating units identified in the BCP as required in the Regional BCP (Reliability Standard	The GOP of each blackstart generating unit t did not test any of the startup and operation of the system blackstart generating units identified in the BCP as required in the Regional BCP (Reliability Standard EOP-

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			Standard EOP-0070, R1.	Standard EOP-0070, R1.	EOP-0070, R1.	0070, R1.
	EOP-009-0	R2.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
AEP	EOP-009-0	R2.	Test results of the startup and operation of each blackstart generating unit were provided to the Regional Reliability Organizations and upon request to NERC, but required testing records were incomplete.	Test results were not provided to the Regional Reliability Organization or NERC upon request.	N/A	N/A
JEA	FAC-001-0	R1.	Each of R1.1-1.3 should be considered a separate requirement for the purposes of assigning VSL's.			
KCPL	FAC-001-0	R1.	N/A	The responsible entity failed to meet sub-requirement R1.3.	The responsible entity failed to meet sub-requirement R1.3 and R1.1.	The responsible entity failed to meet all of the sub-requirements.
NU	FAC-001-0	R1.1.			The responsible entity's implementation/execution is non-compliant with respect to two or more significant elements. In this requirement and in several additional requirements of FAC-001, 002, & 003 the word significant has been omitted.	
SPP ORWG	FAC-001-0	R1.1.	The responsible entity has demonstrated the existence of the required procedure/program but is missing minor details or	The responsible entity has demonstrated the existence of the required procedure/program and is mostly compliant with the	The responsible entity is partially compliant with the requirement and fails to satisfy more than one significant element.	The responsible entity has failed to demonstrate the existence of the program, procedure, protocol, or guidance document

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			minor program/procedural elements. Such deficiencies would not impact the achievement of the objective of the requirement.	Requirement but fails to satisfy at least one significant element.		required.
SPP ORWG	FAC-001-0	R1.2.	The responsible entity has demonstrated the existence of the required procedure/program but is missing minor details or minor program/procedural elements. Such deficiencies would not impact the achievement of the objective of the requirement.	The responsible entity has demonstrated the existence of the required procedure/program and is mostly compliant with the Requirement but fails to satisfy at least one significant element.	The responsible entity is partially compliant with the requirement and fails to satisfy more than one significant element.	The responsible entity has failed to demonstrate the existence of the program, procedure, protocol, or guidance document required.
SPP ORWG	FAC-001-0	R1.3.	The responsible entity has demonstrated the existence of the required procedure/program but is missing minor details or minor program/procedural elements. Such deficiencies would not impact the achievement of the objective of the requirement.	The responsible entity has demonstrated the existence of the required procedure/program and is mostly compliant with the Requirement but fails to satisfy at least one significant element.	The responsible entity is partially compliant with the requirement and fails to satisfy more than one significant element.	The responsible entity has failed to demonstrate the existence of the program, procedure, protocol, or guidance document required.
JEA	FAC-001-0	R2.	Each of R2.1.1-2.1.16 should be considered a separate requirement for the purposes of assigning VSL's.			
SMUD	FAC-001-0	R2.	Language should specify whether equipment must be listed by name specifically or if a general mention is adequate to demonstrate compliance.			

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
JEA	FAC-001-0	R2.1.	Each of R2.1.1-2.1.16 should be considered a separate requirement for the purposes of assigning VSL's			
SPP ORWG	FAC-001-0	R2.1.3.	The responsible entity's program/procedure is non-compliant with respect to one or more minor details.	The responsible entity's program/procedure is non-compliant with respect to one significant element.	The responsible entity's program/procedure is non-compliant with respect to two or more significant elements.	The responsible entity's program/procedure is non-compliant with the requirement.
SPP ORWG	FAC-001-0	R2.1.4.	The responsible entity's program/procedure is non-compliant with respect to one or more minor details.	The responsible entity's program/procedure is non-compliant with respect to one significant element.	The responsible entity's program/procedure is non-compliant with respect to two or more significant elements.	The responsible entity's program/procedure is non-compliant with the requirement.
SPP ORWG	FAC-001-0	R3.	The responsible entity's program/procedure is non-compliant with respect to one or more minor details.	The responsible entity's program/procedure is non-compliant with respect to one significant element.	The responsible entity's program/procedure is non-compliant with respect to two or more significant elements.	The responsible entity's program/procedure is non-compliant with the requirement.
AEP	FAC-002-0	R1.	The responsible entity's program/procedure is non-compliant with respect to one or more significant element within the requirement.	Assessments of the impacts of new facilities were not provided.	N/A	N/A
Dominion	FAC-002-0	R1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	See Q2 comment A
KCPL	FAC-002-0	R1.	The responsible entity is non-compliant with 25% or less of the sub-components.	The responsible entity is non-compliant with 25% or more but less than 50% of the sub-components.	The responsible entity is non-compliant with 50% or more but less than 75% of the sub-components.	The responsible entity is non-compliant with 75% or more of the sub-components.
NCMPA	FAC-002-0	R1.			Should say "... two or more SIGNIFICANT	

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					elements..."	
SPP ORWG	FAC-002-0	R1.	The responsible entity is non-compliant in coordination / communication with required entities with respect to one or more minor details.	The responsible entity is non-compliant in coordination / communication with required entities with respect to one significant element.	The responsible entity is non-compliant in coordination / communication with required entities with respect to two or more significant elements.	The responsible entity is non-compliant with the requirement.
AEP	FAC-002-0	R1.1.	The responsible entity's program/procedure is non-compliant with respect to one or more significant element within the requirement.	Assessments of the impacts of new facilities were not provided.	N/A	N/A
Dominion	FAC-002-0	R1.1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	Comment: Usually only the Transmission Operator/Reliability Authority has the necessary information to perform such analysis. The GO/LSE should only be obligated to provide data related to their facilities for use in such studies.
NCMPA	FAC-002-0	R1.1.			Should say "... two or more SIGNIFICANT elements..."	
NU	FAC-002-0	R1.1.			The responsible entity's implementation/execution is non-compliant with respect to two or more significant elements. In this requirement and in several additional requirements of FAC-001, 002, & 003 the word significant has been omitted.	
SERC —	FAC-002-0	R1.1.	OK	OK	The responsible entity's	OK

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
RRS					implementation/execution is non-compliant with respect to two or more significant elements.	
SMUD	FAC-002-0	R1.1.	Language should be clarified to distinguish whether a minor detail under a subrequirement carries the same weight as a minor detail in a requirement.			
AEP	FAC-002-0	R1.2.	The responsible entity's program/procedure is non-compliant with respect to one or more significant element within the requirement.	Assessments of the impacts of new facilities were not provided.	N/A	N/A
Dominion	FAC-002-0	R1.2.	See Q2 comment B	See Q2 comment B	See Q2 comment B	Comment: Should apply only if entity fails to comply with applicable Regional, subregional and/or individual system planning criteria and facility connection requirements within 60 days of notification.
NCMPA	FAC-002-0	R1.2.			Should say "... two or more SIGNIFICANT elements..."	
SERC — RRS	FAC-002-0	R1.2.	OK	OK	The responsible entity's implementation/execution is non-compliant with respect to two or more significant elements.	OK
AEP	FAC-002-0	R1.3.	The responsible entity's program/procedure is non-compliant with respect to one or more significant element within	Assessments of the impacts of new facilities were not provided.	N/A	N/A

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			the requirement.			
Dominion	FAC-002-0	R1.3.	See Q2 comment B	See Q2 comment B	See Q2 comment B	Again, the transmission operator and reliability authority are the entities most likely to know among which parties coordination needs to occur.
NCMPA	FAC-002-0	R1.3.			Should say "... two or more SIGNIFICANT elements..."	
AEP	FAC-002-0	R1.4.	The responsible entity's program/procedure is non-compliant with respect to one or more significant element within the requirement.	Assessments of the impacts of new facilities were not provided.	N/A	N/A
Dominion	FAC-002-0	R1.4.	See Q2 comment B	See Q2 comment B	See Q2 comment B	Usually only the Transmission Operator/Reliability Authority has the necessary information to perform such analysis. The GO/LSE should only be obligated to provide data related to their facilities for use in such studies.
NCMPA	FAC-002-0	R1.4.			Should say "... two or more SIGNIFICANT elements..."	
SERC — RRS	FAC-002-0	R1.4.	OK	OK	The responsible entity's implementation/execution is non-compliant with respect to two or more significant elements.	OK
AEP	FAC-002-0	R1.5.	The responsible entity's program/procedure is non-compliant with respect to one or more	Assessments of the impacts of new facilities were not provided.	N/A	N/A

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			significant element within the requirement.			
Dominion	FAC-002-0	R1.5.	See Q2 comment B	See Q2 comment B	See Q2 comment B	Usually only the Transmission Operator/Reliability Authority has the necessary information to perform such analysis. The GO/LSE should only be obligated to provide data related to their facilities for use in such studies.
NCMPA	FAC-002-0	R1.5.			Should say "... two or more SIGNIFICANT elements..."	
SOCO Gen	FAC-002-0	R1.5.			The responsible entity's implementation/execution is non-compliant with respect to two or more SIGNIFICANT elements.	
AEP	FAC-002-0	R2.	The responsible entity's program/procedure is non-compliant with respect to one or more significant element within the requirement.	Assessments of the impacts of new facilities were not provided.	N/A	N/A
Dominion	FAC-002-0	R2.	See Q2 comment B	See Q2 comment B	See Q2 comment B	Does not warrant severe VSL
KCPL	FAC-002-0	R2.	N/A	N/A	The responsible entity retained required documentation for less than 3 years.	The responsible entity failed to retain required documentation.
NCMPA	FAC-002-0	R2.			Should say "... two or more SIGNIFICANT elements..."	

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
JEA	FAC-003-1	R1.		The responsible entity is substantially compliant with this requirement but failed to address one or more significant element in its plan.	The responsible entity is not substantially compliant with this requirement and failed to address one or more significant element in its plan.	The responsible entity did not provide any formal TVMP
KCPL	FAC-003-1	R1.	The responsible entity established an adequate TVMP but did not update the TVMP regularly.	The responsible entity established a TVMP but did not include components addressing minor areas.	The responsible entity partially established a TVMP and was found inadequate in key areas.	The responsible entity failed to establish a TVMP.
JEA	FAC-003-1	R1.1.	N/A (Either the entity has a schedule or it does not)	N/A	N/A	The responsible entity did not provide a schedule for vegetation inspections.
KCPL	FAC-003-1	R1.1.	The responsible entity established an adequate inspection schedule but did not update the schedule regularly.	The responsible entity established an inspection schedule but did not include components addressing minor areas.	The responsible entity partially established an inspection schedule and was found inadequate in key areas.	The responsible entity failed to establish an inspection schedule.
AEP	FAC-003-1	R1.2.	The responsible entity has demonstrated the existence of the required procedure/program but is missing minor details or minor program/procedural elements.	The responsible entity has demonstrated the existence of the required procedure/program but fails to satisfy one significant element.	The responsible entity is partially compliant with the requirement and fails to satisfy two or more significant elements.	The responsible entity has failed to demonstrate the existence of the program/procedure required.
JEA	FAC-003-1	R1.2.	Each of R1.2.1-1.2.2.2 should be considered individual requirements for the purposes of assigning VSL's.			
KCPL	FAC-003-1	R1.2.	N/A	N/A	The responsible entity established minimum vegetation clearances but were less than the IEEE standard 516.	The responsible entity failed to establish minimum vegetation clearances.
AEP	FAC-003-1	R1.2.1.	The responsible entity has demonstrated the	The responsible entity has demonstrated the	The responsible entity is partially compliant with	The responsible entity has failed to demonstrate the

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			existence of the required procedure/program but is missing minor details or minor program/procedural elements.	existence of the required procedure/program but fails to satisfy one significant element.	the requirement and fails to satisfy two or more significant elements.	existence of the program/procedure required.
NU	FAC-003-1	R1.2.1.			The responsible entity's implementation/execution is non-compliant with respect to two or more significant elements. In this requirement and in several additional requirements of FAC-001, 002, & 003 the word significant has been omitted.	
SPP ORWG	FAC-003-1	R1.2.1.	The responsible entity's program/procedure is non-compliant with respect to one or more minor details.	The responsible entity's program/procedure is non-compliant with respect to one significant element.	The responsible entity's program/procedure is non-compliant with respect to two or more significant elements.	The responsible entity's program/procedure is non-compliant with the requirement.
AEP	FAC-003-1	R1.2.2.	The responsible entity has demonstrated the existence of the required procedure/program but is missing minor details or minor program/procedural elements.	The responsible entity has demonstrated the existence of the required procedure/program but fails to satisfy one significant element.	The responsible entity is partially compliant with the requirement and fails to satisfy two or more significant elements.	The responsible entity has failed to demonstrate the existence of the program/procedure required.
PJM	FAC-003-1	R1.3.	67-99% of personnel directly involved in the design and implementation of the TVMP have appropriate qualifications and training.	33-66% of personnel directly involved in the design and implementation of the TVMP have appropriate qualifications and training.	Less than 33% of personnel directly involved in the design and implementation of the TVMP have appropriate qualifications and training.	No personnel directly involved in the design and implementation of the TVMP have appropriate qualifications and training.
SPP ORWG	FAC-003-1	R1.4.	The responsible entity's program/procedure is	The responsible entity's program/procedure is	The responsible entity's program/procedure is non-compliant with	The responsible entity's program/procedure is non-

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			non-compliant with respect to one or more minor details.	non-compliant with respect to one significant element.	respect to two or more significant elements.	compliant with the requirement.
PJM	FAC-003-1	R2.	TO has created and implemented an annual plan for vegetation management work to ensure the reliability of the system but it only includes 67-99% of the suggested elements.	TO has created and implemented an annual plan for vegetation management work to ensure the reliability of the system but it only includes 33-66% of the suggested elements.	TO has created and implemented an annual plan for vegetation management work to ensure the reliability of the system but it only includes less than 33% of the suggested elements.	TO has not created or implemented an annual plan for vegetation management work to ensure the reliability of the system.
JEA	FAC-003-1	R3.1.	Explanatory text should have N/A for all the VSL's.			
JEA	FAC-003-1	R3.2.	Explanatory text should have N/A for all the VSL's.			
JEA	FAC-003-1	R3.3.	Explanatory text should have N/A for all the VSL's.			
JEA	FAC-003-1	R3.4.	Explanatory text should have N/A for all the VSL's.			
JEA	FAC-003-1	R3.4.1.	Explanatory text should have N/A for all the VSL's.			
JEA	FAC-003-1	R3.4.2.	Explanatory text should have N/A for all the VSL's.			
JEA	FAC-003-1	R3.4.3.	Explanatory text should have N/A for all the VSL's.			
AEP	FAC-008-1	R1.	The Transmission Owner or Generator Owner has demonstrated the existence of its current	The Transmission Owner or Generator Owner has failed to demonstrate the existence of its Facility	N/A	N/A

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			Facility Ratings Methodology, but the methodology does not cover all its solely and jointly owned Facilities.	Ratings Methodology		
Ameren (1)	FAC-008-1	R1.	The responsible entity's program/procedure is non-compliant with respect to one or more details within the requirement	The responsible entity's program/procedure is non-compliant with respect to one significant element within the requirement	The responsible entity's program/procedure is non-compliant with respect to two or more significant elements within the requirement	The responsible entity's program/procedure is non-compliant with all of the elements of the requirement
Dominion	FAC-008-1	R1.				See Q2 comment A
SMUD	FAC-008-1	R1.	If no changes to the facility ratings or the methodology are warranted, is it necessary to update the methodology just to show that it is "current?"			
AEP	FAC-008-1	R1.1.	The Facility Rating methodology respects the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility but there is no statement in the documentation of the methodology that states this.	The Transmission Owner or Generator Owner has failed to demonstrate that its Facility Rating Methodology respects the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.	N/A	N/A
Dominion	FAC-008-1	R1.1.				Change to "Not Applicable." The requirement is to have a statement in the methodology, the lack of that statement is addressed in Lower.
SERC — RRS	FAC-008-1	R1.1.	Change to Implement; The responsible entity's implementation/execution is non-compliant with	Change to Implement; The responsible entity's implementation/execution is non-compliant with	Change to Implement; The responsible entity's implementation/execution is non-compliant with	Change to Implement; The responsible entity's implementation/execution is non-compliant with the

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			respect to one or more minor details.	respect to one significant element.	respect to two or more significant elements.	requirement.
SERC EC PSS	FAC-008-1	R1.1.				Change to "Not Applicable." The requirement is to have a statement in the methodology, the lack of that statement is addressed in Lower.
SERC OC SRG	FAC-008-1	R1.1.				Change to "Not Applicable." The requirement is to have a statement in the methodology, the lack of that statement is addressed in Lower.
AEP	FAC-008-1	R1.2.	The Transmission Owner or Generator Owner has demonstrated the existence of the required documentation and is mostly compliant with the Requirement but fails to address one or more major type of BES equipment.	The Transmission Owner or Generator Owner has failed to demonstrate that its Facility Rating Methodology includes any of the methods it uses for rating major BES equipment that comprises a Facility.	N/A	N/A
Dominion	FAC-008-1	R1.2.	See Q2 Comment B	See Q2 Comment B	See Q2 Comment B	See Q2 Comment B
SERC — RRS	FAC-008-1	R1.2.	Change to Implement; The responsible entity's implementation/execution is non-compliant with respect to one or more minor details.	Change to Implement; The responsible entity's implementation/execution is non-compliant with respect to one significant element.	Change to Implement; The responsible entity's implementation/execution is non-compliant with respect to two or more significant elements.	Change to Implement; The responsible entity's implementation/execution is non-compliant with the requirement.
SERC EC PSS	FAC-008-1	R1.2.	see Q2 comments.			
SERC OC SRG	FAC-008-1	R1.2.	see Q2 comments.			

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
AEP	FAC-008-1	R1.2.1.	The Transmission Owner or Generator Owner has demonstrated that it has a Facility Rating Methodology that includes methods of rating BES equipment but the equipment rating methods don't address one or more of the applicable required devices.	N/A	N/A	N/A
Dominion	FAC-008-1	R1.2.1.				See Q2 comment A
PJM	FAC-008-1	R1.2.1.	The scope of equipment addressed only included 67-99% of the devices.	The scope of equipment addressed only included 33-66% of the devices.	The scope of equipment addressed only included less than 33% of the devices.	The scope of equipment addressed did not include generators, transmission conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.
SERC — RRS	FAC-008-1	R1.2.1.	Change to Implement; The responsible entity's implementation/execution is non-compliant with respect to one or more minor details.	Change to Implement; The responsible entity's implementation/execution is non-compliant with respect to one significant element.	Change to Implement; The responsible entity's implementation/execution is non-compliant with respect to two or more significant elements.	Change to Implement; The responsible entity's implementation/execution is non-compliant with the requirement.
SOCO Gen	FAC-008-1	R1.2.1.	The Transmission Owner or Generator Owner has demonstrated that it has a Facility Rating Methodology that includes methods of rating BES equipment but the equipment rating methods don't address one of the applicable required devices.	This should be re-classified as LOWER VSL because the scope of devices is open ended and, therefore, open to interpretation by the auditor/entity. Replace with: The Transmission Owner or Generator Owner has demonstrated the existence of methods of rating equipment but	This should be re-classified as MODERATE VSL because the scope of devices is open ended and, therefore, open to interpretation by the auditor/entity. Replace with: The Transmission Owner or Generator Owner has demonstrated the existence of methods of rating equipment but	The Transmission Owner or Generator Owner has NOT demonstrated the existence of methods of rating equipment.

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				the equipment rating methods don't address two of the applicable required devices.	the equipment rating methods don't address MORE THAN two of the applicable required devices.	
AEP	FAC-008-1	R1.2.2.	The Transmission Owner or Generator Owner's equipment Ratings methodology fails to include a methodology for determining both normal and emergency ratings for its BES equipment.	N/A	N/A	N/A
Dominion	FAC-008-1	R1.2.2.		Typo: delete "and"	Typo: delete "of"	Typo: delete "of"
SERC — RRS	FAC-008-1	R1.2.2.	Change to Implement; The responsible entity's implementation/execution is non-compliant with respect to one or more minor details.	Change to Implement; The responsible entity's implementation/execution is non-compliant with respect to one significant element.	Change to Implement; The responsible entity's implementation/execution is non-compliant with respect to two or more significant elements.	Change to Implement; The responsible entity's implementation/execution is non-compliant with the requirement.
SERC EC PSS	FAC-008-1	R1.2.2.		Typo: delete "and"	Typo: delete "of"	Typo: delete "of"
SERC OC SRG	FAC-008-1	R1.2.2.		Typo: delete "and"	Typo: delete "of"	Typo: delete "of"
SOCO Gen	FAC-008-1	R1.2.2.	N/A	The Transmission Owner or Generator Owner's equipment Ratings methodology does address a methodology for determining NORMAL ratings but fails to include a methodology for determining EMERGENCY ratings WHERE APPLICABLE for its BES equipment.	The Transmission Owner or Generator Owner's equipment Ratings methodology does address a methodology for determining EMERGENCY ratings WHERE APPLICABLE but fails to include a methodology for determining NORMAL ratings for its BES	The Transmission Owner or Generator Owner's equipment Ratings methodology fails to demonstrate the inclusion of any method for determining normal RATINGS or emergency ratings WHERE APPLICABLE of its BES equipment. [Added WHERE APPLICABLE

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				[Added WHERE APPLICABLE because emergency ratings may not be applied in the case of generating equipment.]	equipment. [Added WHERE APPLICABLE because emergency ratings may not be applied in the case of generating equipment.]	because emergency ratings may not be applied in the case of generating equipment.]
AEP	FAC-008-1	R1.3.	The responsible entity failed to comply with less than 25% of the number of sub-components.	The responsible entity failed to comply with more than 25% of the number of sub-components.	N/A	N/A
ATC	FAC-008-1	R1.3.	Suggested language: Complied with more than or equal to 75% but less than 100%.	Suggested language: Complied with more than or equal to 50% but less than 75%	Suggested language: Complied with more than or equal to 25% but less than 50%	Suggested language: Complied with less than 25% Overall Comment: ATC believes that the suggested modifications make the VSL's more readable, but that it's overall purpose is lacking. It's our interpretation that the VSL is only looking at the quantity of items considered not the quality for the program. ATC would ask that the STD review the VSL and develop something that addresses both the quantity and quality.
Dominion	FAC-008-1	R1.3.			The responsible entity failed to comply with 50% or more and less than 75% of the number of sub-components.	The responsible entity failed to comply with 75% or more of the number of sub-components.
KCPL	FAC-008-1	R1.3.			The responsible entity failed to comply with 50% or more and less than 75% of the number of sub-components.	The responsible entity failed to comply with 75% of the number of sub-components.

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
SERC EC PSS	FAC-008-1	R1.3.			The responsible entity failed to comply with 50% or more and less than 75% of the number of sub-components.	The responsible entity failed to comply with 75% or more of the number of sub-components.
SERC OC SRG	FAC-008-1	R1.3.			The responsible entity failed to comply with 50% or more and less than 75% of the number of sub-components.	The responsible entity failed to comply with 75% or more of the number of sub-components.
AEP	FAC-008-1	R1.3.1.	The Transmission Owner or Generator Owner has failed to demonstrate the existence (in its Facility Rating Methodology) of how it considered ratings provided by equipment manufacturers.	N/A	N/A	N/A
Dominion	FAC-008-1	R1.3.1.				See Q2 Comment A
SERC EC PSS	FAC-008-1	R1.3.1.				"Not applicable." See Q4 comment.
SERC OC SRG	FAC-008-1	R1.3.1.				"Not applicable." See Q4 comment.
SOCO Gen	FAC-008-1	R1.3.1.				Delete. The VSLs applied at the main requirement level are more appropriate and are adequate for application to the subrequirements.
AEP	FAC-008-1	R1.3.2.	The Transmission Owner or Generator Owner has failed to demonstrate how it considered design criteria in developing its equipment Ratings.	N/A	N/A	N/A

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
Dominion	FAC-008-1	R1.3.2.				See Q2 Comment A
SERC EC PSS	FAC-008-1	R1.3.2.				"Not applicable." See Q4 comment.
SERC OC SRG	FAC-008-1	R1.3.2.				"Not applicable." See Q4 comment.
SOCO Gen	FAC-008-1	R1.3.2.				Delete. The VSLs applied at the main requirement level are more appropriate and are adequate for application to the subrequirements.
AEP	FAC-008-1	R1.3.3.	The Transmission Owner or Generator Owner has failed to demonstrate how it considered ambient conditions in developing its equipment Ratings.	N/A	N/A	N/A
Dominion	FAC-008-1	R1.3.3.				See Q2 Comment A
SERC EC PSS	FAC-008-1	R1.3.3.				"Not applicable." See Q4 comment.
SERC OC SRG	FAC-008-1	R1.3.3.				"Not applicable." See Q4 comment.
SOCO Gen	FAC-008-1	R1.3.3.				Delete. The VSLs applied at the main requirement level are more appropriate and are adequate for application to the subrequirements.
AEP	FAC-008-1	R1.3.4.	The Transmission Owner or Generator Owner has	N/A	N/A	N/A

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			failed to demonstrate how it considered operating limitations in developing its equipment Ratings.			
Dominion	FAC-008-1	R1.3.4.				See Q2 Comment A
SERC EC PSS	FAC-008-1	R1.3.4.				"Not applicable." See Q4 comment.
SERC OC SRG	FAC-008-1	R1.3.4.				"Not applicable." See Q4 comment.
SOCO Gen	FAC-008-1	R1.3.4.				Delete. The VSLs applied at the main requirement level are more appropriate and are adequate for application to the subrequirements.
AEP	FAC-008-1	R1.3.5.	The Transmission Owner or Generator Owner has failed to demonstrate how it considered other assumptions in developing its equipment Ratings.	N/A	N/A	N/A
Dominion	FAC-008-1	R1.3.5.				See Q2 Comment A
SERC EC PSS	FAC-008-1	R1.3.5.				"Not applicable." See Q4 comment.
SERC OC SRG	FAC-008-1	R1.3.5.				"Not applicable." See Q4 comment.
SOCO Gen	FAC-008-1	R1.3.5.				Delete. The VSLs applied at the main requirement level are more appropriate

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						and are adequate for application to the subrequirements. Furthermore, R1.3.5 is very subjective and open to interpretation to the entity and auditor.
AEP	FAC-008-1	R2.	The Transmission Owner or Generator Owner has made its Facility Ratings Methodology available to all required entities but not within 15 business days of a request.	The Transmission Owner or Generator Owner has not made its Facility Rating Methodology available to any of the required entities in accordance with Requirement R2 within 60 business days of receipt of a request.	N/A	N/A
AEP	FAC-008-1	R3.	The responsible entity provided a response as required but took longer than 45 business days.	The responsible entity did not provide any evidence to demonstrate that it provided a response to a comment on its Facility Ratings Methodology in accordance with Requirement R3 within 90 business days.	N/A	N/A
AEP	FAC-009-1	R1.	The Transmission Owner or Generator Owner developed Facility Ratings for most, but not all of its solely and jointly owned Facilities following the associated Facility Ratings Methodology - or - the Transmission Owner or Generator Owner developed Facility Ratings for all its solely and jointly owned Facilities but failed to follow the associated	The Transmission Owner or Generator Owner has failed to demonstrate that it developed any Facility Ratings using its Facility Rating Methodology	N/A	N/A

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			Facility Ratings Methodology in one or more significant area.			
Dominion	FAC-009-1	R1.	See Q2 Comment B			
AEP	FAC-009-1	R2.	The Transmission Owner or Generator Owner provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by up to 15 calendar days.	The Transmission Owner or Generator Owner has failed to provide its Facility Ratings to any of the requesting entities within 30 calendar days of the associated schedules.	N/A	N/A
Dominion	FAC-009-1	R2.				Does not warrant Severe VSL
Hydro One	FAC-009-1	R2.	The requirement does not mention meeting a request schedule of 15 days.	Combine the requirement of providing ratings to entities with the type of facility (new, existing, modified).	Combine the requirement of providing ratings to entities with the type of facility (new, existing, modified).	The requirement does not mention meeting a request schedule of 30 days.
PJM	FAC-009-1	R2.	The Transmission Owner or Generator Owner provided its Facility Ratings to all of the requesting entities but missed meeting the schedules.	-	The Transmission Owner or Generator Owner failed to provide its Facility Ratings to two or more of the requesting entities.	The Transmission Owner or Generator Owner has failed to provide its Facility Ratings to any of the requesting entities.
Entergy (2)	INT-001-2	R1.	what defines an instance? Each hour? Each day? Each entity?			
Entergy (2)	INT-001-2	R2.	what defines an instance? Each hour? Each day? Each entity?			

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
Dominion	INT-004-1	R1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
KCPL	INT-004-1	R2.	The Purchase-Selling entity failed to update the tags when required less than 10% of times it was required.	The Purchase-Selling entity failed to update the tags when required 10% or more and less than 25% of the times it was required.	The Purchase-Selling entity failed to update the tags when required 25% or more and less than 50% of the times it was required.	The Purchase-Selling entity failed to update the tags when required more than 50% of the times it was required.
KCPL	INT-005-1	R1.			The Interchange Authority experienced three occurrences of not distributing information to all involved reliability entities or to non-involved Balancing Authorities.	
KCPL	INT-006-1	R1.1.	The Balancing Authority failed to evaluate arranged interchange with respect to one or more of the requirements in the 3 sub-components less than 10% of the number of times.	The Balancing Authority failed to evaluate arranged interchange with respect to one or more of the requirements in the 3 sub-components less than 25% of the number of times.	The Balancing Authority failed to evaluate arranged interchange with respect to one or more of the requirements in the 3 sub-components less than 50% of the number of times.	The Balancing Authority failed to evaluate arranged interchange with respect to one or more of the requirements in the 3 sub-components less than 75% of the number of times.
KCPL	INT-007-1	R1.	The Interchange Authority failed to verify that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange greater than 0% but less than or equal to 1% of the time.	The Interchange Authority failed to verify that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange greater than 1% but less than or equal to 5% of the time.	The Interchange Authority failed to verify that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange greater than 5% but less than or equal to 10% of the time.	The Interchange Authority failed to verify that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange greater than 10% of the time.
KCPL	INT-008-1	R1.	The Interchange Authority experienced	The Interchange Authority experienced	The Interchange Authority experienced	The Interchange Authority experienced four

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			one occurrence of not distributing information to all involved reliability entities within defined time period.	two occurrences of not distributing information to all involved reliability entities within defined time period.	three occurrences of not distributing information to all involved reliability entities within defined time period.	occurrences of not distributing information to all involved reliability entities or no evidence provided within defined time period.
KCPL	INT-008-1	R1.1.	The Interchange Authority experienced occurrences of not distributing information to all involved reliability entities greater than 0% but less than or equal to 1% of the time.	The Interchange Authority experienced occurrences of not distributing information to all involved reliability entities greater than 1% but less than or equal to 5% of the time.	The Interchange Authority experienced occurrences of not distributing information to all involved reliability entities greater than 5% but less than or equal to 10% of the time.	The Interchange Authority experienced occurrences of not distributing information to all involved reliability entities greater than 10% of the time.
KCPL	INT-009-1	R1.	The Balancing Authority experienced occurrences of not implementing a Confirmed Interchange as received from the Interchange Authority greater than 0% but less than or equal to 1% of the time.	The Balancing Authority experienced occurrences of not implementing a Confirmed Interchange as received from the Interchange Authority greater than 1% but less than or equal to 5% of the time.	The Balancing Authority experienced occurrences of not implementing a Confirmed Interchange as received from the Interchange Authority greater than 5% but less than or equal to 10% of the time.	The Balancing Authority experienced occurrences of not implementing a Confirmed Interchange as received from the Interchange Authority greater than 10% of the time.
Entergy (2)	INT-010-1	R1.	does this mean for each hour? Or each loss of resource event that could run across several hours?			
SPP ORWG	IRO-001-1	R1.				The responsible entity has failed to demonstrate implementation or execution of the requirement.
SPP ORWG	IRO-001-1	R3.				The responsible entity has failed to demonstrate implementation or execution of the

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						requirement.
Dominion	IRO-004-1	R4.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
SPP ORWG	IRO-005-1	R12.	The responsible entity's implementation/execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details.	The responsible entity's implementation/execution is mostly compliant with the requirement but fails to satisfy at least one significant element.	The responsible entity's implementation/execution is partially compliant with the requirement but fails to satisfy more than one significant element.	The responsible entity has failed to demonstrate implementation or execution of the requirement.
SPP ORWG	IRO-005-1	R14.	The responsible entity's implementation/execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details.	The responsible entity's implementation/execution is mostly compliant with the requirement but fails to satisfy at least one significant element.	The responsible entity's implementation/execution is partially compliant with the requirement but fails to satisfy more than one significant element.	The responsible entity has failed to demonstrate implementation or execution of the requirement.
SPP ORWG	IRO-005-1	R15.	The responsible entity has demonstrated coordination/communication with required entities with minor exception and is substantially compliant with the directives of the requirement.	The responsible entity has demonstrated coordination/communication with required entities with some exception and is mostly compliant with the directives of the requirement.	The responsible entity has demonstrated coordination/communication with others but was substantially deficient in meeting the directives of the requirement.	The responsible entity has failed to demonstrate coordination/communication with required entities as directed by the requirement.
AEP	MOD-010-0	R1.	The responsible entity has demonstrated the reporting of required information but fails to satisfy one or more significant elements."	The responsible entity has failed to report as directed by the requirement.	N/A	N/A
Dominion	MOD-010-0	R1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	Violations for MOD should not warrant Severe VSL

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
SERC — RRS	MOD-010-0	R1.	OK	remove end quotation marks	remove end quotation marks	OK
AEP	MOD-010-0	R2.	The responsible entity has demonstrated the reporting of required information but fails to satisfy one or more significant elements."	The responsible entity has failed to report as directed by the requirement.	N/A	N/A
Dominion	MOD-010-0	R2.	See Q2 comment B	See Q2 comment B	See Q2 comment B	Violations for MOD should not warrant Severe VSL
SERC — RRS	MOD-010-0	R2.	OK	remove end quotation marks	remove end quotation marks	OK
AEP	MOD-012-0	R1.	The responsible entity has demonstrated the reporting of required information but fails to satisfy one or more significant elements."	The responsible entity has failed to report as directed by the requirement.	N/A	N/A
Dominion	MOD-012-0	R1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	Violations for MOD should not warrant Severe VSL
AEP	MOD-012-0	R2.	The responsible entity has demonstrated the reporting of required information but fails to satisfy one or more significant elements."	The responsible entity has failed to report as directed by the requirement.	N/A	N/A
Dominion	MOD-012-0	R2.	See Q2 comment B	See Q2 comment B	See Q2 comment B	Violations for MOD should not warrant Severe VSL
KCPL	MOD-016-1	R1.	The Planning Authority and Regional Reliability Organization has demonstrated the			

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			existence of the required procedure/program but is missing minor details or minor program/procedural elements.			
SMUD	MOD-016-1	R1.	Language isn't as explicit as the subsequent VSLs. Reconsider the applicability of this level.			
WECC LRS	MOD-016-1	R1.	"...Such deficiencies would impact..." replacing "...would not impact..." [Eliminates trivial non-compliance.]	Strike "at least." Otherwise ambiguous when compared to High VSL		
KCPL	MOD-016-1	R1.1.	The Planning Authority and Regional Reliability Organization has demonstrated the existence of the required procedure/program but is missing minor details or minor program/procedural elements.			
WECC LRS	MOD-016-1	R1.1.	"...Such deficiencies would impact..." replacing "...would not impact..." [Eliminates trivial non-compliance.]	Strike "at least." Otherwise ambiguous when compared to High VSL		
WECC LRS	MOD-016-1	R2.	"...has demonstrated the distribution of the required documentation to the appropriate Planning Authority..." [Standard calls for distribution of documentation not	[Same comment on distribution of documentation] "---fails to distribute to one appropriate Planning Authority." replaces "...fails to satisfy at least one significant element."	[Same comment on distribution of documentation.] "---fails to distribute to more than one appropriate Planning Authority." replaces "...fails to satisfy more than one significant	"distribute" replaces "report" as operative verb.

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			reporting of information. Some PAs are not appropriate entities, given actual source of data.]	[More specific and measureable.]	element." [More specific and measureable.]	
SERC — RRS	MOD-016-1	R2.1.	The Regional Reliability Organization was one day or more but less than one week late in distributing the documentation as specified in R1 and R2.	The Regional Reliability Organization was one week or more but less than 3 weeks late in distributing the documentation as specified in R1 and R2.	The Regional Reliability Organization was 3 weeks or more but less than one month late in distributing the documentation as specified in R1 and R2.	The Regional Reliability Organization was one month or more late in distributing the documentation as specified in R1 and R2.
WECC LRS	MOD-016-1	R2.1.	"no more than one week late" replaces "one day late." [Proposal was unduly punitive.]	"...was one to three weeks late..." [Clarity]	"... was three to four weeks late..." [Clarity]	
SMUD	MOD-016-1	R3.		This VSL is indistinguishable from Hisg VSL as worded. Clarify language or collapse into either Moderate or High VSL.		
WECC LRS	MOD-016-1	R3.	"...demonstrated the distribution of the required documentation..." [Language of the standard] "...to the appropriate LSEs" [Some don't actually provide the data.]	[Same comment on distribution of documentation] "... distribute to one appropriate LSE" replaces "...satisfy at least one significant element." [More specific and measureable.]	[Same comment on distribution of documentation] "... distribute to more than one appropriate LSE" replaces "...satisfy more than one significant element." [More specific and measureable.]	"distribute" not "report" as operative verb.
WECC LRS	MOD-016-1	R3.1.	"no more than one week" replaces "at least one day" [Proposal was unduly punitive.]	"...was one to three weeks late..." [Clarity]	"... was three to four weeks late..." [Clarity]	
Dominion	MOD-017-0	R1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	Does not warrant sever VSL

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
KCPL	MOD-017-0	R1.	The responsible entity failed to meet one of the sub-requirements.	The responsible entity failed to meet two of the sub-requirements.	The responsible entity failed to meet three of the sub-requirements.	The responsible entity failed to meet all of the sub-requirements.
SMUD	MOD-017-0	R1.	Implies that missing several minor details will not add up to a "significant" detail and will remain under this VSL. Be explicit in how many minor details add up to a significant element in the Moderate VSL.			
WECC LRS	MOD-017-0	R1.	"appropriate LSE" [some don't provide this data]. Add: "...or is less than one week late in submitting the required data." [Adds specificity]	"appropriate LSE" [some don't provide this data]. Add: "...or is between one and two weeks late in submitting the required data." [Adds specificity]	"appropriate LSE" [some don't provide this data]. Add: "...or is between two and three weeks late in submitting the required data." [Adds specificity]	"appropriate LSE" [some don't provide this data]. Add: "...or is greater than three weeks late in submitting the required data." [Adds specificity]
WECC LRS	MOD-017-0	R1.1.	Delete and replace with "N/A"			
WECC LRS	MOD-017-0	R1.2.	Delete and replace with "N/A"			
WECC LRS	MOD-017-0	R1.3.	Delete and replace with "N/A"			
WECC LRS	MOD-017-0	R1.4.	Delete and replace with "N/A"			
Dominion	MOD-018-0	R1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	See Q2 comment A
SMUD	MOD-018-0	R1.	Language isn't as explicit as the other VSLs. Reconsider applicability of this level.			
WECC LRS	MOD-018-0	R1.	Delete and replace with "N/A"	Delete and replace with "N/A"	Delete and replace with "N/A"	Delete and replace with "N/A"

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
Entergy (2)	MOD-018-0	R1.1.	The responsible entity has failed to indicate on the report if the non member loads were included or not as directed by the requirement. The responsible entity has demonstrated the reporting the of required information but is noncompliant with minor details while still satisfying all significant elements			n/a
WECC LRS	MOD-018-0	R1.1.	Replace with "The responsible entity has failed to indicate on the report if the non-member loads were included or not as directed by the requirement."	"The responsible entity responds incorrectly." [A more serious problem than failing to respond at all, which is easily noticed and addressed.]		Replace with "N/A"
WECC LRS	MOD-018-0	R1.2.		"...satisfy one significant element (e.g., assumptions methods or manner in which uncertainties are treated.)" [Delete "at least" - ambiguous compared to High.]	"...satisfy more than one significant element (e.g., assumptions methods or manner in which uncertainties are treated.)"	
WECC LRS	MOD-019-0	R1.	"...demonstrated due diligence in the reporting..." Add: "Such deficiencies would impact the achievement of the objective of the requirement." [Eliminates trivial non-compliance.]	"...fails to satisfy one..." [Delete "at least," ambiguous with respect to High.]		

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
WECC LRS	MOD-020-0	R1.		"...fails to satisfy one..." [Delete "at least," ambiguous with respect to High.]		
WECC LRS	MOD-021-0	R1.	"...Such deficiencies would impact..." replacing "...would not impact..." [Eliminates trivial non-compliance.]	"...fails to satisfy one..." [Delete "at least," ambiguous with respect to High.]		
WECC LRS	MOD-021-0	R2.	"...Such deficiencies would impact..." replacing "...would not impact..." [Eliminates trivial non-compliance.]	"...fails to satisfy one..." [Delete "at least," ambiguous with respect to High.]		
WECC LRS	MOD-021-0	R3.	Replace with "The appropriate LSE [some are not] or other responsible entity is no more than one week late in submitting the requested documentation." [Eliminates trivial non-compliance.]	Replace with "The appropriate LSE [some are not] or other responsible entity is between one and two weeks late in submitting the requested documentation." [Adds specificity.]	Replace with "The appropriate LSE [some are not] or other responsible entity is between two and three weeks late in submitting the requested documentation." [Adds specificity.]	Replace with "The appropriate LSE [some are not] or other responsible entity is greater than three weeks late in submitting the requested documentation." [Adds specificity.]
WECC OTS	PER-002-0	R1.	The responsible entity has produced the training records for the training completed for more than 75% but less than 100% of their operating personnel. OTS agrees	The responsible entity has produced the training records for the training completed for more than 50% but less than or equal to 75% of their operating personnel. OTS agrees	The responsible entity has produced the training records for the training completed for more than 25% but less than or equal to 50% of their operating personnel. OTS agrees	The responsible entity has produced the training records for the training completed for more than or equal to 0% but less than or equal to 25% of their operating personnel. OTS agrees

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
KCPL	PER-002-0	R2.	The responsible entity has produced the training program for more than 75% but less than 100% of their real-time operating positions.	The responsible entity has produced the training program for more than 50% but less than or equal to 75% of their real-time operating positions	The responsible entity has produced the training program for more than 25% but less than or equal to 50% of their real-time operating positions.	The responsible entity has produced the training program for more than or equal to 0% but less than or equal to 25% of their real-time operating positions.
SPP ORWG	PER-002-0	R2.	The responsible entity has produced the training program for more than 75% but less than 100% of their real-time operating positions.	The responsible entity has produced the training program for more than 50% but less than or equal to 75% of their real-time operating positions	The responsible entity has produced the training program for more than 25% but less than or equal to 50% of their real-time operating positions.	The responsible entity has produced the training program for more than or equal to 0% but less than or equal to 25% of their real-time operating positions.
WECC OTS	PER-002-0	R2.	The responsible entity has produced the training program for more than 75% but less than 100% of their real-time operating personnel. OTS agrees	The responsible entity has produced the training program for more than 50% but less than or equal to 75% of their real-time operating personnel. OTS agrees	The responsible entity has produced the training program for more than 25% but less than or equal to 50% of their real-time operating personnel. OTS agrees	The responsible entity has produced the training program for more than or equal to 0% but less than or equal to 25% of their real-time operating personnel. OTS agrees
WECC OTS	PER-002-0	R2.1.	Text of this requirement is exclusively explanatory. All explanatory Requirements that have a risk factor assigned to them shall have a VSL of Lower assigned to them OTS agrees	NA OTS agrees	NA OTS agrees	NA OTS agrees
WECC OTS	PER-002-0	R2.2.	Text of this requirement is exclusively explanatory. All explanatory Requirements that have a risk factor assigned to them shall have a VSL of Lower assigned to them OTS agrees	NA OTS agrees	NA OTS agrees	NA OTS agrees

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
AEP	PER-002-0	R3.			The responsible entity has achieved a measure of performance equal to or below 50% but above 25% of the number of sub-components.	The responsible entity has achieved a measure of performance equal to or below 25% of the number of sub-components.
WECC OTS	PER-002-0	R3.	The responsible entity failed to comply with less than 25% of the number of sub-components. OTS disagrees with the VSL Bin based on Criteria of Multi Component and feels it should be changed to Explanatory Text. The OTS feels there is a double grade, in that the VSL identifies each component as well as an overall component.	The responsible entity failed to comply with 25% or more and less than 50% of the number of sub-components. OTS suggests - NA	The responsible entity has achieved a measure of performance equal to or below 50% but above 25% of the appropriate measure. OTS suggests - NA	The responsible entity has achieved a measure of performance equal to or below 25% of the appropriate measure. OTS suggests - NA
AEP	PER-002-0	R3.1.	The responsible entity's implementation / execution is mostly compliant with the requirement but fails to satisfy at least one significant element (e.g. NERC and Regional Reliability Organization standards, entity operating procedures, applicable regulatory requirements, and applicable knowledge, competencies, normal, emergency, and restoration conditions)	The responsible entity's implementation / execution is partially compliant with the requirement and fails to satisfy more than one significant element (e.g. NERC and Regional Reliability Organization standards, entity operating procedures, applicable regulatory requirements, and applicable knowledge, competencies, normal, emergency, and restoration conditions)	The responsible entity has failed to have a set of program objectives.	N/A
KCPL	PER-002-0	R3.1.	The responsible entity failed to define training program objectives for	The responsible entity failed to define training program objectives for	The responsible entity failed to define training program objectives for	The responsible entity failed to define training program objectives for

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			less than 25% of the NERC and Regional Reliability Organizations standards, entity operating procedures, and applicable regulatory requirements.	25% or more less than 50% of the NERC and Regional Reliability Organizations standards, entity operating procedures, and applicable regulatory requirements.	50% or more less than 75% of the NERC and Regional Reliability Organizations standards, entity operating procedures, and applicable regulatory requirements.	75% or more of the NERC and Regional Reliability Organizations standards, entity operating procedures, and applicable regulatory requirements.
SPP ORWG	PER-002-0	R3.1.	The responsible entity failed to define training program objectives for less than 25% of the NERC and Regional Reliability Organizations standards, entity operating procedures, and applicable regulatory requirements.	The responsible entity failed to define training program objectives for 25% or more less than 50% of the NERC and Regional Reliability Organizations standards, entity operating procedures, and applicable regulatory requirements.	The responsible entity failed to define training program objectives for 50% or more less than 75% of the NERC and Regional Reliability Organizations standards, entity operating procedures, and applicable regulatory requirements.	The responsible entity failed to define training program objectives for 75% or more of the NERC and Regional Reliability Organizations standards, entity operating procedures, and applicable regulatory requirements.
WECC OTS	PER-002-0	R3.1.	The responsible entity's implementation / execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details (e.g. NERC and Regional Reliability Organization standards, entity operating procedures, applicable regulatory requirements, and applicable knowledge, competencies, normal, emergency, and restoration conditions) OTS agrees	The responsible entity's implementation / execution is mostly compliant with the requirement but the fails to satisfy at least one significant element (e.g. NERC and Regional Reliability Organization standards, entity operating procedures, applicable regulatory requirements, and applicable knowledge, competencies, normal, emergency, and restoration conditions) OTS agrees	The responsible entity's implementation / execution is partially compliant with the requirement and fails to satisfy more than one significant element (e.g. NERC and Regional Reliability Organization standards, entity operating procedures, applicable regulatory requirements, and applicable knowledge, competencies, normal, emergency, and restoration conditions) OTS agrees	The responsible entity's implementation / execution has failed to demonstrate implementation or execution of the training program requirement (e.g. NERC and Regional Reliability Organization standards, entity operating procedures, applicable regulatory requirements, and applicable knowledge, competencies, normal, emergency, and restoration conditions training objectives are not defined) OTS agrees
ATC	PER-002-0	R3.2.		ATC would rather see		

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				some type of qualifier in terms of the percentage of competencies missed in the program instead of the and/or statements.		
KCPL	PER-002-0	R3.2.	The responsible entity has a plan for continuing training of operating personnel and for initial training of operating personnel, but the plan does not address the knowledge and the competencies required for reliable system operations.	<p>The responsible entity does not have a plan for initial training of operating personnel.</p> <p>AND</p> <p>The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.</p>	<p>The responsible entity does not have a plan for continuing training of operating personnel.</p> <p>AND</p> <p>The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.</p>	<p>The responsible entity does not have a plan for continuing training of operating personnel.</p> <p>AND</p> <p>The responsible entity does not have a plan for initial training of operating personnel.</p> <p>AND</p> <p>The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.</p>
SPP ORWG	PER-002-0	R3.2.	The responsible entity has a plan for continuing training of operating personnel and for initial training of operating personnel, but the plan does not address the knowledge and the competencies required for reliable system operations.	<p>The responsible entity does not have a plan for initial training of operating personnel.</p> <p>AND</p> <p>The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.</p>	<p>The responsible entity does not have a plan for continuing training of operating personnel.</p> <p>AND</p> <p>The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.</p>	<p>The responsible entity does not have a plan for continuing training of operating personnel.</p> <p>AND</p> <p>The responsible entity does not have a plan for initial training of operating personnel.</p> <p>AND</p> <p>The responsible entity's</p>

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						plan does not address the knowledge and competencies required for reliable system operations.
WECC OTS	PER-002-0	R3.2.	<p>The responsible entity does not have a plan for continuing training of operating personnel.</p> <p>OR</p> <p>The responsible entity does not have a plan for initial training of operating personnel.</p> <p>OR</p> <p>The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.</p> <p>OTS suggests the following: The responsible entity meets the intent however, the execution is deficient and is missing minor details, i.e. the list of knowledge and competencies is not accurate.</p>	<p>The responsible entity does not have a plan for continuing training of operating personnel.</p> <p>OR</p> <p>The responsible entity does not have a plan for initial training of operating personnel.</p> <p>AND</p> <p>The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.</p> <p>OTS suggests moving the lower VSL to the moderate as follows:</p> <p>The responsible entity does not have a plan for</p>	<p>The responsible entity does not have a plan for continuing training of operating personnel.</p> <p>AND</p> <p>The responsible entity does not have a plan for initial training of operating personnel.</p> <p>OR</p> <p>The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.</p> <p>OTS suggests moving the moderate VSL to the high and removing the current high VSL as follows:</p> <p>The responsible entity</p>	<p>The responsible entity does not address the knowledge and competencies required for reliable system operations.</p> <p>AND</p> <p>The responsible entity does not have a plan for initial training of operating personnel.</p> <p>AND</p> <p>The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.</p> <p>OTS agrees</p>

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				<p>continuing training of operating personnel.</p> <p>OR</p> <p>The responsible entity does not have a plan for initial training of operating personnel.</p> <p>OR</p> <p>The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.</p>	<p>does not have a plan for continuing training of operating personnel.</p> <p>OR</p> <p>The responsible entity does not have a plan for initial training of operating personnel.</p> <p>AND</p> <p>The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.</p>	
ATC	PER-002-0	R3.3.				<p>ATC disagree with the insertion of the word "dedicated" into the VSL. ATC employs day shift operators who trade with shift SCOs on T-days to obtain adequate training time; however, there are no prescheduled, "dedicated" training days for day-shift SCOs.</p>
WECC OTS	PER-002-0	R3.3.	<p>The responsible entity has produced the training program with more than 75% but less than 100% of operating personnel provided with dedicated training time.</p> <p>OTS agrees</p>	<p>The responsible entity has produced the training program with more than 50% but less than or equal to 75% of operating personnel provided with dedicated training time.</p>	<p>The responsible entity has produced the training program with more than 25% but less than or equal to 50% of operating personnel provided with dedicated training time.</p>	<p>The responsible entity has produced the training program with more than or equal to 0% but less than or equal to 25% of operating personnel provided with dedicated training time.</p>

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				OTS agrees	OTS agrees	OTS agrees
AEP	PER-002-0	R3.4.		N/A	The responsible entity has produced the training program with no training staff identified.	N/A
ATC	PER-002-0	R3.4.				This could actually have less of an impact than what is described for the Moderate and High VSL's as it may simply have been a documentation oversight. The lack of identifying training staff is a "Lower" VSL. The focus should be on the capabilities and not the documentation.
JEA	PER-002-0	R3.4.	The responsible entity has produced the training program with training staff identified that lacks instructional capabilities.	The responsible entity has produced the training program with training staff identified that lacks knowledge of system operations.		
WECC OTS	PER-002-0	R3.4.	N/A OTS agrees	The responsible entity has produced the training program with training staff identified that lacks knowledge of system operations. OR The responsible entity has produced the training program with training staff identified that lacks instructional capabilities.	The responsible entity has produced the training program with training staff identified that lacks knowledge of system operations. AND The responsible entity has produced the training program with training staff identified that lacks instructional capabilities. OTS agrees	The responsible entity has produced the training program with no training staff identified. OTS agrees

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				OTS agrees		
JEA	PER-002-0	R4.	The responsible entity provided an average of 4.5 but less than 5 days of required training for personnel identified in R2, where training for an individual above 5 hours is not included in the average calculation.(AVG = SUM(MAX(5, #days ea person trained) / # of personnel id'd in R2))	The responsible entity provided an average of 4 but less than 4.5 days of required training for personnel identified in R2 where training for an individual above 5 hours is not included in the average calculation.	The responsible entity provided an average of 3.5 but less than 4 days of required training for personnel identified in R2 where training for an individual above 5 hours is not included in the average calculation..	The responsible entity provided less than an average of 3.5 days of required training for personnel identified in R2 where training for an individual above 5 hours is not included in the average calculation.
KCPL	PER-002-0	R4.	For personnel identified in Requirement R2, the responsible entity provided at least four days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.	For personnel identified in Requirement R2, the responsible entity provided at least three days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel..	For personnel identified in Requirement R2, the responsible entity provided at least two days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.	For personnel identified in Requirement R2, the responsible entity provided at least one day per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.
SPP ORWG	PER-002-0	R4.	For personnel identified in Requirement R2, the responsible entity provided at least four days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.	For personnel identified in Requirement R2, the responsible entity provided at least three days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel..	For personnel identified in Requirement R2, the responsible entity provided at least two days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.	For personnel identified in Requirement R2, the responsible entity provided at least one day per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.
WECC OTS	PER-002-0	R4.	NA	NA	NA	For personnel identified in Requirement R2, the responsible entity did not provide at least five days per year of training and drills using realistic

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>OTS suggests the following: NA</p>	<p>OTS suggests the following: The responsible entity has produced the training program for more than 90% but less than or equal to 100% of their real-time operating personnel.</p>	<p>OTS suggests the following: The responsible entity has produced the training program for more than 75% but less than or equal to 90% of their real-time operating personnel.</p>	<p>simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.</p> <p>OTS suggests the following: The responsible entity has produced the training program for more than or equal to 0% but less than or equal to 75% of their real-time operating personnel.</p>
AEP	PER-003-0	R1.	N/A	N/A	The responsible entity's implementation / execution is partially compliant with the requirement but fails to satisfy one applicable function (i.e., either R1.1 or R1.2).	The responsible entity has failed to demonstrate implementation or execution of the program / procedure requirement or directive with either of the two applicable functions (i.e., R1.1 and R1.2).
KCPL	PER-003-0	R1.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 0 hours and less than 12 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 12 hours and less than 36 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 36 hours and less than 72 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 72 hours for any operating position for a calendar month.
SPP ORWG	PER-003-0	R1.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 0 hours and less 12 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 12 hours and less 36 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 36 hours and less 72 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 72 hours for any operating position for a calendar month.

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
WECC OTS	PER-003-0	R1.	<p>The responsible entity's implementation / execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details.</p> <p>OTS disagrees with the VSL Bin based on Criteria of Mult Component and feels it should be changed to Numerical.</p> <p>OTS suggests the following: The responsible entity has failed to meet the minimum acceptable performance of this requirement but has achieved a performance level equal to or above the 75th percentile of the appropriate measure.</p>	<p>The responsible entity's implementation / execution is mostly compliant with the requirement but fails to satisfy at least one significant element.</p> <p>OTS suggests the following: The responsible entity has achieved the measure of performance level but equal to or above the 50th percentile of the appropriate measure.</p>	<p>The responsible entity's implementation / execution is partially compliant with the requirement and fails to satisfy more than one significant element.</p> <p>OTS suggests the following: The responsible entity has achieved the measure of performance level below or equal to the 50th percentile but equal to or above the 25th percentile of the appropriate measure.</p>	<p>The responsible entity has failed to demonstrate implementation or execution of the program / procedure requirement or directive.</p> <p>OTS suggests the following: The responsible entity has achieved the measure of performance level below the 25th percentile of the appropriate measure.</p>
WECC OTS	PER-003-0	R1.1.	<p>Text of this requirement is exclusively explanatory. All explanatory Requirements that have a risk factor assigned to them shall have a VSL of Lower assigned to them</p> <p>OTS agrees</p>	<p>NA</p> <p>OTS agrees</p>	<p>NA</p> <p>OTS agrees</p>	<p>NA</p> <p>OTS agrees</p>
WECC OTS	PER-003-0	R1.2.	<p>Text of this requirement is exclusively</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			explanatory. All explanatory Requirements that have a risk factor assigned to them shall have a VSL of Lower assigned to them OTS agrees	OTS agrees	OTS agrees	OTS agrees
JEA	PER-004-1	R1.	The VSL's should be consistent with PER-002-0 R1			
KCPL	PER-004-1	R1.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 0 hours and less than 12 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 12 hours and less than 36 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 36 hours and less than 72 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 72 hours for any operating position for a calendar month.
SPP ORWG	PER-004-1	R1.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 0 hours and less 12 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 12 hours and less 36 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 36 hours and less 72 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 72 hours for any operating position for a calendar month.
JEA	PER-004-1	R2.	The responsible entity provided an average of 4.5 but less than 5 days of required training for personnel identified in R2, where training for an individual above 5 hours is not included in the average calculation.(AVG = SUM(MAX(5, #days ea person trained) / # of personnel id'd in R2))	The responsible entity provided an average of 4 but less than 4.5 days of required training for personnel identified in R2 where training for an individual above 5 hours is not included in the average calculation.	The responsible entity provided an average of 3.5 but less than 4 days of required training for personnel identified in R2 where training for an individual above 5 hours is not included in the average calculation.	The responsible entity provided less than an average of 3.5 days of required training for personnel identified in R2 where training for an individual above 5 hours is not included in the average calculation.

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
KCPL	PER-004-1	R3.	Reliability Coordinator personnel have a comprehensive understanding of the interactions with at least 75% and less than 100% of neighboring Reliability Coordinator areas.	Reliability Coordinator personnel have a comprehensive understanding of the interactions with 50% or more and less than 75% of neighboring Reliability Coordinator areas.	Reliability Coordinator personnel have a comprehensive understanding of the interactions with 25% or more and less than 50% of neighboring Reliability Coordinator areas.	Reliability Coordinator personnel have a comprehensive understanding of the interactions less than 25% of neighboring Reliability Coordinator areas.
SPP ORWG	PER-004-1	R3.	Reliability Coordinator personnel have a comprehensive understanding of the interactions with at least 75% and less than 100% of neighboring Reliability Coordinator areas.	Reliability Coordinator personnel have a comprehensive understanding of the interactions with 50% or more and less than 75% of neighboring Reliability Coordinator areas.	Reliability Coordinator personnel have a comprehensive understanding of the interactions with 25% or more and less than 50% of neighboring Reliability Coordinator areas.	Reliability Coordinator personnel have a comprehensive understanding of the interactions less than 25% of neighboring Reliability Coordinator areas.
KCPL	PER-004-1	R4.	Reliability Coordinator operating personnel have an extensive understanding of the operations of more than 75% and less than 100% of all Balancing Authorities, Transmission Operators and Generator Operators in the Reliability Coordinator Area.	Reliability Coordinator operating personnel have an extensive understanding of the operations of more than 50% and less than 75% of all Balancing Authorities, Transmission Operators and Generator Operators in the Reliability Coordinator Area.	Reliability Coordinator operating personnel have an extensive understanding of the operations of more than 25% and less than 50% of all Balancing Authorities, Transmission Operators and Generator Operators in the Reliability Coordinator Area.	Reliability Coordinator operating personnel have an extensive understanding of the operations of less than 25% of all Balancing Authorities, Transmission Operators and Generator Operators in the Reliability Coordinator Area.
SPP ORWG	PER-004-1	R4.	Reliability Coordinator operating personnel have an extensive understanding of the operations of more than 75% and less than 100% of all Balancing Authorities, Transmission Operators and Generator Operators in the	Reliability Coordinator operating personnel have an extensive understanding of the operations of more than 50% and less than 75% of all Balancing Authorities, Transmission Operators and Generator Operators in the	Reliability Coordinator operating personnel have an extensive understanding of the operations of more than 25% and less than 50% of all Balancing Authorities, Transmission Operators and Generator Operators in the	Reliability Coordinator operating personnel have an extensive understanding of the operations of less than 25% of all Balancing Authorities, Transmission Operators and Generator Operators in the Reliability Coordinator Area.

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			Reliability Coordinator Area.	Reliability Coordinator Area.	Reliability Coordinator Area.	
KCPL	PER-004-1	R5.	Reliability Coordinator has failed to provide its operating personnel with less than 25% of the SOL and IROL limits and for inter-tie facility limits OR the protocols to ensure best available data at all times is not in place.	Reliability Coordinator has failed to provide its operating personnel with 25% or more and less than 50% of the SOL and IROL limits and for inter-tie facility limits.	Reliability Coordinator has failed to provide its operating personnel with 50% or more and less than 75% of the SOL and IROL limits and for inter-tie facility limits.	Reliability Coordinator has failed to provide its operating personnel with 75% or more of the SOL and IROL limits and for inter-tie facility limits.
SPP ORWG	PER-004-1	R5.	Reliability Coordinator has failed to provide its operating personnel with less than 25% of the SOL and IROL limits and for inter-tie facility limits OR the protocols to ensure best available data at all times is not in place.	Reliability Coordinator has failed to provide its operating personnel with 25% or more and less than 50% of the SOL and IROL limits and for inter-tie facility limits.	Reliability Coordinator has failed to provide its operating personnel with 50% or more and less than 75% of the SOL and IROL limits and for inter-tie facility limits.	Reliability Coordinator has failed to provide its operating personnel with 75% or more of the SOL and IROL limits and for inter-tie facility limits.
Entergy (1)	PRC-001-1	R2.1.			Notification of relay or equipment failure was made to the Transmission Operator and Host Balancing Authority, and corrective action plan has been implemented.	Notification of relay or equipment failure was not made to the Transmission Operator and Host Balancing Authority, and corrective action was not taken and a corrective action plan has not been developed.
Dominion	PRC-001-1	R3.1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
Dominion	PRC-001-1	R5.	See Q2 comment B	See Q2 comment B	See Q2 comment B	See Q2 comment A

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
Dominion	PRC-001-1	R5.1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
KCPL	PRC-001-1	R6.	Don't agree with the requirements. This may not be the correct criteria and this requirement may be duplicated in previous requirements?			
KCPL	PRC-004-1	R1.				Misoperations have occurred and they have not been documented.
Entergy (1)	PRC-004-1	R2.	Documentation of Misoperations is complete, but analysis and documentation of Corrective Action Plans is incomplete.	Documentation of Misoperations is complete, and analysis has been done but Corrective Action Plans is incomplete.		
KCPL	PRC-004-1	R2.				Misoperations have occurred and they have not been documented.
AEP	PRC-004-1	R3.	N/A	Documentation of Misoperations or documentation of corrective action plans are incomplete.	N/A	The responsible entity has failed to report as directed by the requirement. Neither required documentations are complete.
Dominion	PRC-005-1	R1.				Who determines whether a particular Protection Systems that affect the reliability of the BES? Severe should be applied to a requirement, not sub. See Q2 comment A

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
AEP	PRC-005-1	R1.1.	N/A	The responsible entity has failed to establish maintenance or testing intervals and their basis.	N/A	The responsible entity has failed to establish maintenance and testing intervals and their basis.
Dominion	PRC-005-1	R1.1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	See Q2 comment A
NU	PRC-005-1	R1.1.	Describe what minor details means. Provide a few examples.	One significant element - is this one substation missing, a line relays package missing, or one relay missing? One out of ten, one out of 1000?	Describe what partially and one significant element means. One out of how many systems? Each owner will have a different number of systems.	Is this failure to identify a specific piece of equipment by oversight, or failure to take any action on the standard.
AEP	PRC-005-1	R1.2.	N/A	The responsible entity has failed to provide maintenance or testing procedures.	N/A	The responsible entity has failed to provide both the maintenance and testing procedures.
Dominion	PRC-005-1	R1.2.	See Q2 comment B	See Q2 comment B	See Q2 comment B	See Q2 comment A
NU	PRC-005-1	R1.2.	Describe what minor details means. Provide a few examples.	One significant element - is this one substation missing, a line relays package missing, or one relay missing? One out of ten, one out of 1000?	Describe what partially and one significant element means. One out of how many systems? Each owner will have a different number of systems.	Is this failure to identify a specific piece of equipment by oversight, or failure to take any action on the standard.
Dominion	PRC-005-1	R2.				See Q2 comment A
SOCO Gen	PRC-005-1	R2.	The responsible entity did not provide documentation of its Protection System maintenance and testing program within 30 days. [This is consistent with other standard's assigned VSLs such as FAC-008-1 R2 and R3.]			The responsible entity did not provide documentation of its Protection System maintenance and testing program within 60 days. [This is consistent with other standard's assigned VSLs such as FAC-008-1 R2 and R3.]

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
AEP	PRC-005-1	R2.1.	Responsible entity reported the required information but failed to maintain or test 5% or less of devices within the defined interval, but a mitigation plan is in place to do the work.	Responsible entity reported the required information but failed to maintain or test 5% or less of devices within the defined interval, and an mitigation plan is NOT in place to do the work.	N/A	The responsible entity has failed to report as directed by the requirement.
Dominion	PRC-005-1	R2.1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	See Q2 comment A
NU	PRC-005-1	R2.1.	Describe what minor details means. Provide a few examples.			Is this failure to identify a specific piece of equipment by oversight, or failure to take any action on the standard.
SOCO Gen	PRC-005-1	R2.1.	Less than or equal to 25% of the installed devices did not comply with R2.1.	Less than or equal to 37.5% but greater than 25% of devices did not comply with R2.1	Less than or equal to 50% but greater than 37.5% of devices did not comply with R2.1	Greater than 50% of devices did not comply with R1.1
AEP	PRC-005-1	R2.2.	Responsible entity has documented the last test/maintenance date but has left out dates for <5% of the equipment to be tested/maintained. A mitigation plan is in place to address the deficiency.	Responsible entity has documented the last test/maintenance date but has left out dates for <5% of the equipment to be tested/maintained. A mitigation plan is NOT in place to address the deficiency.	N/A	The responsible entity has failed to report as directed by the requirement.
Dominion	PRC-005-1	R2.2.	See Q2 comment B	See Q2 comment B	See Q2 comment B	See Q2 comment A
NU	PRC-005-1	R2.2.	Describe what minor details means. Provide a few examples.			Is this failure to identify a specific piece of equipment by oversight, or failure to take any action on the standard.
SOCO Gen	PRC-005-1	R2.2.	Less than or equal to 25% of the installed devices did not comply with R2.1.	Less than or equal to 37.5% but greater than 25% of devices did not comply with R2.1	Less than or equal to 50% but greater than 37.5% of devices did not comply with R2.1	Greater than 50% of devices did not comply with R1.1

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
NCMPA	PRC-007-0	R2.			Should say "... satisfy at LEAST three database ..."	
KCPL	PRC-009-0	R1.	The responsible entity failed to comply with one of the sub-components	The responsible entity failed to comply with two of the sub-components	The responsible entity failed to comply with three of the sub-components	The responsible entity failed to comply with all of the sub-components
Dominion	PRC-010-0	R1.				See Q2 comment A
Dominion	PRC-010-0	R1.1.1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
Dominion	PRC-010-0	R1.1.2.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
Dominion	PRC-010-0	R1.1.3.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
NU	PRC-010-0	R1.1.3.	VSLs refer to "minor details" and "significant elements". As applied to a review of voltage set points and timing, it would seem the test should be whether a review was done or not, unless the standard specifies what's to be included in the review.			
Dominion	PRC-010-0	R2.	See Q2 comment B	See Q2 comment B	See Q2 comment B	

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
Dominion	PRC-015-0	R1.				Does not warrant severe VSL
Dominion	PRC-015-0	R2.				Does not warrant severe VSL
KCPL	PRC-015-0	R2.	The responsible entity's implementation / execution has resulted in meeting the intent of the requirement but was deficient with respected to minor details	The responsible entity's implementation / execution mostly compliant with the requirement but fails to satisfy at least one significant element	The responsible entity's implementation / execution partially compliant with the requirement but fails to satisfy more than one significant element	The responsible entity has failed to demonstrate implementation or execution of the program / procedure requirement or directive
Dominion	PRC-015-0	R3.				If the intent is to verify SPS operates correctly, then the requirement should be to show that SPS operated as designed within 30 days of a qualifying event. Models and simulations should be part of the design/coordination phases. Does not warrant severe VSL
Dominion	PRC-016-0	R1.				Does not warrant severe VSL
Dominion	PRC-016-0	R2.				
Dominion	PRC-016-0	R3.				Does not warrant severe VSL
Hydro One	PRC-017-0	R1.	VSL's for this requirement and it's sub-requirements can be			

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			merged and based on details of the requirement, i.e. maintenance & testing program (s).			
KCPL	PRC-017-0	R1.1.	Criteria - Implement The responsible entity's implementation / execution has resulted in meeting the intent of the requirement but was deficient with respected to minor details	The responsible entity's implementation / execution mostly compliant with the requirement but fails to satisfy at least one significant element	The responsible entity's implementation / execution partially compliant with the requirement but fails to satisfy more than one significant element	The responsible entity has failed to demonstrate implementation or execution of the program / procedure requirement or directive
Dominion	PRC-017-0	R1.1.1.	See Q2 Comment B	See Q2 Comment B	See Q2 Comment B	
NU	PRC-017-0	R1.1.1.	Describe what minor details means. Provide a few examples.	One significant element - is this one substation missing, a line relays package missing, or one relay missing? One out of ten, one out of 1000?	Describe what partially and one significant element means. One out of how many systems? Each owner will have a different number of systems.	Is this failure to identify a specific piece of equipment by oversight, or failure to take any action on the standard.
Dominion	PRC-017-0	R1.1.2.	See Q2 Comment B	See Q2 Comment B	See Q2 Comment B	
NU	PRC-017-0	R1.1.2.	Describe what minor details means. Provide a few examples.	One significant element - is this one substation missing, a line relays package missing, or one relay missing? One out of ten, one out of 1000?	Describe what partially and one significant element means. One out of how many systems? Each owner will have a different number of systems.	Is this failure to identify a specific piece of equipment by oversight, or failure to take any action on the standard.
Dominion	PRC-017-0	R1.1.3.	See Q2 Comment B	See Q2 Comment B	See Q2 Comment B	
NU	PRC-017-0	R1.1.3.	Describe what minor details means. Provide a few examples.	One significant element - is this one substation missing, a line relays	Describe what partially and one significant element means. One out	Is this failure to identify a specific piece of equipment by oversight, or failure to

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				package missing, or one relay missing? One out of ten, one out of 1000?	of how many systems? Each owner will have a different number of systems.	take any action on the standard.
Dominion	PRC-017-0	R1.1.4.	See Q2 Comment B	See Q2 Comment B	See Q2 Comment B	
NU	PRC-017-0	R1.1.4.	Describe what minor details means. Provide a few examples.	One significant element - is this one substation missing, a line relays package missing, or one relay missing? One out of ten, one out of 1000?	Describe what partially and one significant element means. One out of how many systems? Each owner will have a different number of systems.	Is this failure to identify a specific piece of equipment by oversight, or failure to take any action on the standard.
Dominion	PRC-017-0	R1.2.	See Q2 Comment B	See Q2 Comment B	See Q2 Comment B	
NU	PRC-017-0	R1.2.	Describe what minor details means. Provide a few examples.	One significant element - is this one substation missing, a line relays package missing, or one relay missing? One out of ten, one out of 1000?	Describe what partially and one significant element means. One out of how many systems? Each owner will have a different number of systems.	Is this failure to identify a specific piece of equipment by oversight, or failure to take any action on the standard.
AEP	PRC-017-0	R1.3.	The responsible entity's implementation / execution is mostly compliant with the requirement but fails to satisfy at one or more significant elements.	The responsible entity has failed to demonstrate implementation or execution of the program / procedure requirement or directive	N/A	N/A
Dominion	PRC-017-0	R1.3.	See Q2 Comment B	See Q2 Comment B	See Q2 Comment B	
KCPL	PRC-017-0	R1.3.	Criteria - Explanatory Text Text of this requirement is exclusively explanatory. All explanatory	N/A	N/A	N/A

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			requirements that have a risk factor assigned to them shall have a VSL of Lower assigned to them			
NU	PRC-017-0	R1.3.	Describe what minor details means. Provide a few examples.	One significant element - is this one substation missing, a line relays package missing, or one relay missing? One out of ten, one out of 1000?	Describe what partially and one significant element means. One out of how many systems? Each owner will have a different number of systems.	Is this failure to identify a specific piece of equipment by oversight, or failure to take any action on the standard.
AEP	PRC-017-0	R1.4.	The responsible entity's implementation / execution is mostly compliant with the requirement but fails to satisfy at one or more significant elements.	The responsible entity has failed to demonstrate implementation or execution of the program / procedure requirement or directive	N/A	N/A
Dominion	PRC-017-0	R1.4.	See Q2 Comment B	See Q2 Comment B	See Q2 Comment B	
NU	PRC-017-0	R1.4.	Describe what minor details means. Provide a few examples.	One significant element - is this one substation missing, a line relays package missing, or one relay missing? One out of ten, one out of 1000?	Describe what partially and one significant element means. One out of how many systems? Each owner will have a different number of systems.	Is this failure to identify a specific piece of equipment by oversight, or failure to take any action on the standard.
	PRC-017-0	R1.5.	See Q2 Comment B	See Q2 Comment B	See Q2 Comment B	
AEP	PRC-017-0	R1.5.	The responsible entity's implementation / execution is mostly compliant with the requirement but fails to satisfy at one or more significant elements.	The responsible entity has failed to demonstrate implementation or execution of the program / procedure requirement or directive	N/A	N/A
NU	PRC-017-0	R1.5.	Describe what minor details means. Provide a few examples.	One significant element - is this one substation missing, a line relays	Describe what partially and one significant element means. One out	Is this failure to identify a specific piece of equipment by oversight, or failure to

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				package missing, or one relay missing? One out of ten, one out of 1000?	of how many systems? Each owner will have a different number of systems.	take any action on the standard.
AEP	PRC-017-0	R1.6.	The responsible entity's implementation / execution is mostly compliant with the requirement but fails to satisfy at one or more significant elements.	The responsible entity has failed to demonstrate implementation or execution of the program / procedure requirement or directive	N/A	N/A
Dominion	PRC-017-0	R1.6.	See Q2 Comment B	See Q2 Comment B	See Q2 Comment B	
NU	PRC-017-0	R1.6.	Describe what minor details means. Provide a few examples.	One significant element - is this one substation missing, a line relays package missing, or one relay missing? One out of ten, one out of 1000?	Describe what partially and one significant element means. One out of how many systems? Each owner will have a different number of systems.	Is this failure to identify a specific piece of equipment by oversight, or failure to take any action on the standard.
AEP	PRC-017-0	R2.	The responsible entity has provided the documentation in more than 90 calendar days but less than 145 calendar days.	The responsible entity has provided the documentation in 145 calendar days or more.	N/A	N/A
Dominion	PRC-017-0	R2.	See Q2 Comment B	See Q2 Comment B	See Q2 Comment B	
NU	PRC-017-0	R2.	Describe what minor details means. Provide a few examples.	One significant element - is this one substation missing, a line relays package missing, or one relay missing? One out of ten, one out of 1000?	Describe what partially and one significant element means. One out of how many systems? Each owner will have a different number of systems.	OK
Dominion	PRC-018-1	R1.1.				Does not warrant severe VSL

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
KCPL	PRC-018-1	R1.1.	Not all DME devices met requirement R1.1, however, all DME devices were synchronized within 20 milliseconds of UTC.	Not all DME devices met requirement R1.1, however, all DME devices were synchronized within 40 milliseconds of UTC.	Not all DME devices met requirement R1.1, however, all DME devices were synchronized within 60 milliseconds of UTC.	Not all DME devices met requirement R1.1, however, all DME devices were synchronized within 80 milliseconds of UTC.
Dominion	PRC-018-1	R1.2.				Does not warrant severe VSL
KCPL	PRC-018-1	R1.2.	Less than or equal to 12% of the DME devices required to be installed by the Regional Reliability Organization did not comply with R1.2	Less than or equal to 18% but greater than 12% of the DME devices required to be installed by the Regional Reliability Organization did not comply with R1.2	Less than or equal to 24% but greater than 18% of the DME devices required to be installed by the Regional Reliability Organization did not comply with R1.2	Greater than 24% of the DME devices required to be installed by the Regional Reliability Organization did not comply with R1.2
NU	PRC-018-1	R1.2.	Less than or equal to 12% (but greater than 0%) of installed DME devices did not comply with R1.2. (This applies to R.1.1, R.2, all sections of R.3, and R.4 as well.)			
Dominion	PRC-018-1	R2.				Does not warrant severe VSL
KCPL	PRC-018-1	R2.	Less than or equal to 25% of the DME devices required to be installed by the Regional Reliability Organization did not comply with R2	Less than or equal to 50% but greater than 25% of the DME devices required to be installed by the Regional Reliability Organization did not comply with R2	Less than or equal to 75% but greater than 50% of the DME devices required to be installed by the Regional Reliability Organization did not comply with R2	Greater than 75% of the DME devices required to be installed by the Regional Reliability Organization did not comply with R2
AEP	PRC-018-1	R3.	Text of this requirement is exclusively explanatory. All explanatory Requirements that have a	N/A	N/A	N/A

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			risk factor assigned to them shall have a VSL of Lower assigned to them			
Dominion	PRC-018-1	R3.1.				Does nor warrant severe VSL
KCPL	PRC-018-1	R3.1.	Criteria - Numerical The requirements remain unchanged.			
Dominion	PRC-018-1	R3.2.				Does nor warrant severe VSL
Dominion	PRC-018-1	R3.3.				Does nor warrant severe VSL
Dominion	PRC-018-1	R3.4.				Does nor warrant severe VSL
Dominion	PRC-018-1	R3.5.				Does nor warrant severe VSL
Dominion	PRC-018-1	R3.6.				Does nor warrant severe VSL
Dominion	PRC-018-1	R3.7.				Does nor warrant severe VSL
Dominion	PRC-018-1	R3.8.				Does nor warrant severe VSL
Dominion	PRC-018-1	R4.				Does nor warrant severe VSL
KCPL	PRC-018-1	R4.	Less than or equal to 25% of the DME devices required to be installed by the Regional Reliability Organization did not comply with R4	Less than or equal to 50% but greater than 25% of the DME devices required to be installed by the Regional Reliability Organization did not comply with R4	Less than or equal to 75% but greater than 50% of the DME devices required to be installed by the Regional Reliability Organization did not comply with R4	Greater than 75% of the DME devices required to be installed by the Regional Reliability Organization did not comply with R4

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
Dominion	PRC-018-1	R5.				Does not warrant severe VSL
NU	PRC-018-1	R5.	VSLs refer to “minor details” and “significant elements”. Specifics or guidance seem necessary, particularly since this is monitoring equipment, not protective relaying.			
AEP	PRC-018-1	R6.	Text of this requirement is exclusively explanatory. All explanatory Requirements that have a risk factor assigned to them shall have a VSL of Lower assigned to them	N/A	N/A	N/A
NU	PRC-018-1	R6.	VSLs refer to “minor details” and “significant elements”. Specifics or guidance seem necessary, particularly since this is monitoring equipment, not protective relaying.			
AEP	PRC-018-1	R6.1.	N/A	The responsible entity has failed to establish maintenance or testing intervals and their basis.	N/A	The responsible entity has failed to establish maintenance and testing intervals and their basis.
Dominion	PRC-018-1	R6.1.	See Q2 Comment B	See Q2 Comment B	See Q2 Comment B	Does not warrant severe VSL
AEP	PRC-018-1	R6.2.	N/A	The responsible entity has failed to provide maintenance or testing procedures.	N/A	The responsible entity has failed to provide both the maintenance and testing procedures.

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
Dominion	PRC-018-1	R6.2.	See Q2 Comment B	See Q2 Comment B	See Q2 Comment B	
NU	PRC-021-1	R1.	The responsible entity is non-compliant with 25% or less (but greater than 0%) of the sub-components.			
KCPL	PRC-021-1	R1.1.	NA This requirements should be reporting criteria but are covered under the multi-component criteria in requirement - R1	NA	NA	NA
KCPL	PRC-021-1	R1.2.	NA This requirements should be reporting criteria but are covered under the multi-component criteria in requirement - R1	NA	NA	NA
KCPL	PRC-021-1	R1.3.	NA This requirements should be reporting criteria but are covered under the multi-component criteria in requirement - R1	NA	NA	NA
KCPL	PRC-021-1	R1.4.	NA This requirements should be reporting criteria but are covered under the multi-component	NA	NA	NA

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			criteria in requirement - R1			
KCPL	PRC-021-1	R1.5.	NA This requirements should be reporting criteria but are covered under the multi-component criteria in requirement - R1	NA	NA	NA
NU	PRC-022-1	R1.	The responsible entity is non-compliant with 25% or less (but greater than 0%) of the sub-components.			
Dominion	PRC-022-1	R1.1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
KCPL	PRC-022-1	R1.1.	N/A This requirements should be reporting criteria but are covered under the multi-component criteria in requirement - R1	NA	NA	NA
Dominion	PRC-022-1	R1.2.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
KCPL	PRC-022-1	R1.2.	N/A This requirements should be reporting criteria but are covered under the multi-component criteria in requirement - R1	NA	NA	NA

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
Dominion	PRC-022-1	R1.3.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
KCPL	PRC-022-1	R1.3.	N/A This requirements should be reporting criteria but are covered under the multi-component criteria in requirement - R1	NA	NA	NA
Dominion	PRC-022-1	R1.4.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
KCPL	PRC-022-1	R1.4.	N/A This requirements should be reporting criteria but are covered under the multi-component criteria in requirement - R1	NA	NA	NA
Dominion	PRC-022-1	R1.5.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
KCPL	PRC-022-1	R1.5.	N/A This requirements should be reporting criteria but are covered under the multi-component criteria in requirement - R1	NA	NA	NA
Dominion	PRC-022-1	R2.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
KCPL	PRC-022-1	R2.	Criteria - Reporting The responsible entity is non-compliant in the reporting of	The responsible entity is non-compliant in the reporting of required	The responsible entity is non-compliant in the reporting of required	The responsible entity is non-compliant with the requirement.

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			required information with respect to on or more minor details.	information with respect to one significant element.	information with respect to two or more significant elements.	
KCPL	TOP-001-1	R2.		Operational emergency not detected or no action taken to mitigate detected operational emergency in "immediate" time period, where immediate is defined as within 30 minutes of initiation of operational emergency, but problem was corrected prior to IROL violation or damage to equipment occurred.	Actions taken within "immediate" time period, where immediate is defined as within 30 minutes of initiation of operational emergency, and operational emergency was not resolved prior to IROL violation or damage to equipment.	
SPP ORWG	TOP-001-1	R2.		Operational emergency not detected or no action taken to mitigate detected operational emergency in "immediate" time period, where immediate is defined as within 30 minutes of initiation of operational emergency, but problem was corrected prior to IROL violation or damage to equipment occurred.	Actions taken within "immediate" time period, where immediate is defined as within 30 minutes of initiation of operational emergency, and operational emergency was not resolved prior to IROL violation or damage to equipment.	
Dominion	TOP-001-1	R3.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
KCPL	TOP-001-1	R3.	N/A	N/A	The responsible entity did not comply	The responsible entity failed to comply with

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					with reliability directives issued by the Reliability Coordinator due to the directive actions would violate safety, equipment, regulatory or statutory requirements and failed to notify the Reliability Coordinator of such.	reliability directives issued by the Reliability Coordinator.
SPP ORWG	TOP-001-1	R3.	N/A	N/A	The responsible entity did not comply with reliability directives issued by the Reliability Coordinator due to the directive actions would violate safety, equipment, regulatory or statutory requirements and failed to notify the Reliability Coordinator of such.	The responsible entity failed to comply with reliability directives issued by the Reliability Coordinator.
KCPL	TOP-001-1	R4.	N/A	N/A	The responsible entity did not comply with reliability directives issued by the Reliability Coordinator due to directive actions would violate safety, equipment, regulatory or statutory requirements and failed to notify the Reliability Coordinator of such.	The responsible entity failed to comply with reliability directives issued by the Reliability Coordinator.
SPP ORWG	TOP-001-1	R4.	N/A	N/A	The responsible entity did not comply with reliability directives issued by the Reliability Coordinator due to	The responsible entity failed to comply with reliability directives issued by the Reliability

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					directive actions would violate safety, equipment, regulatory or statutory requirements and failed to notify the Reliability Coordinator of such.	Coordinator.
KCPL	TOP-001-1	R5.	Responsible entity avoided or mitigated a real-time or potential emergency condition and notified other affected Transmission Operators but failed to notify its Reliability Coordinator.	Responsible entity avoided or mitigated a real-time or potential emergency condition but failed to notify its Reliability Coordinator or other affected Transmission Operators.	Responsible entity failed to notify its Reliability Coordinator or other affected Transmission Operators of a real-time or potential emergency condition and was aware of the operating condition and was unable to mitigate or avoid the emergency condition.	Responsible entity was unaware of the real-time or potential emergency condition.
SPP ORWG	TOP-001-1	R5.	Responsible entity avoided or mitigated a real-time or potential emergency condition and notified other affected Transmission Operators but failed to notify its Reliability Coordinator.	Responsible entity avoided or mitigated a real-time or potential emergency condition but failed to notify its Reliability Coordinator or other affected Transmission Operators.	Responsible entity failed to notify its Reliability Coordinator or other affected Transmission Operators of a real-time or potential emergency condition and was aware of the operating condition and was unable to mitigate or avoid the emergency condition.	Responsible entity was unaware of the real-time or potential emergency condition.
Dominion	TOP-001-1	R6.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
Dominion	TOP-001-1	R7.	See Q2 comment B	See Q2 comment B	See Q2 comment B	See Q2 comment A
KCPL	TOP-001-1	R7.	The responsible entity removed transmission facilities or generator facilities from service which did not result in a burden	The responsible entity removed transmission facilities or generator facilities from service which did result in a burden to	The responsible entity removed transmission facilities or generator facilities from service which did result in a burden to	The responsible entity removed transmission facilities or generator facilities from service which did result in a burden to the

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			to the interconnect, but failed to notify its Reliability Coordinator or other affected Transmission Operators of such actions.	the interconnect and notified its Reliability Coordinator but failed to notify other affected Transmission Operators of such actions.	the interconnect and notified other affected Transmission Operators, but failed to notify its Reliability Coordinator of such actions.	interconnect and failed to notify other affected Transmission Operators and failed to notify its Reliability Coordinator of such actions.
SPP ORWG	TOP-001-1	R7.	The responsible entity removed transmission facilities or generator facilities from service which did not result in a burden to the interconnect, but failed to notify its Reliability Coordinator or other affected Transmission Operators of such actions.	The responsible entity removed transmission facilities or generator facilities from service which did result in a burden to the interconnect and notified its Reliability Coordinator but failed to notify other affected Transmission Operators of such actions.	The responsible entity removed transmission facilities or generator facilities from service which did result in a burden to the interconnect and notified other affected Transmission Operators, but failed to notify its Reliability Coordinator of such actions.	The responsible entity removed transmission facilities or generator facilities from service which did result in a burden to the interconnect and failed to notify other affected Transmission Operators and failed to notify its Reliability Coordinator of such actions.
Dominion	TOP-001-1	R7.1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
Dominion	TOP-001-1	R7.3.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
Dominion	TOP-002-2	R13.	See Q2 comment B	See Q2 comment B	See Q2 comment B	Does not warrant severe VSL
Dominion	TOP-002-2	R14.	See Q2 comment B	See Q2 comment B	See Q2 comment B	See Q2 comment A
KCPL	TOP-002-2	R14.	N/A	The responsible entity notified its Reliability Coordinator but failed to notify its Balancing Authority of real generator output capabilities.	The responsible entity notified its Balancing Authority but failed to notify its Reliability Coordinator of real generator output capabilities.	The responsible entity failed to notify its Reliability Coordinator and its Balancing Authority of real generator output capabilities.
SPP ORWG	TOP-002-2	R14.	N/A	The responsible entity notified its Reliability	The responsible entity notified its Balancing	The responsible entity failed to notify its Reliability

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				Coordinator but failed to notify its Balancing Authority of real generator output capabilities.	Authority but failed to notify its Reliability Coordinator of real generator output capabilities.	Coordinator and its Balancing Authority of real generator output capabilities.
	TOP-002-2	R14.1.	N/A	N/A	N/A	N/A
Dominion	TOP-002-2	R14.1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
Dominion	TOP-002-2	R15.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
KCPL	TOP-002-2	R16.	N/A	The responsible entity notified its Reliability Coordinator of a change in transmission facility status or a change in transmission facility rating but failed to do so in a timely manner.	The responsible entity failed to notify its Reliability Coordinator of a change in transmission facility status or a change in transmission facility rating.	The responsible entity failed to notify its Reliability Coordinator of a change in transmission facility status and a change in transmission facility rating.
SPP ORWG	TOP-002-2	R16.	N/A	The responsible entity notified its Reliability Coordinator of a change in transmission facility status or a change in transmission facility rating but failed to do so in a timely manner.	The responsible entity failed to notify its Reliability Coordinator of a change in transmission facility status or a change in transmission facility rating.	The responsible entity failed to notify its Reliability Coordinator of a change in transmission facility status and a change in transmission facility rating.
Dominion	TOP-002-2	R18.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
ATC	TOP-002-2	R19.				The current VSLs do not align with the requirement. The requirement states that the TOP has to maintain an accurate computer models utilized for analyzing and planning system operations. The VSL have been written in a format that would lead an

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						entity to believe that NERC has a model as to judge the accuracy of an individual TOP's model against. ATC believe that NERC has no such model and feels that the VSL should be rewritten in a way were this preconceived notion of accuracy is not implied.
Dominion	TOP-002-2	R3.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
Dominion	TOP-002-2	R8.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
Dominion	TOP-003-0	R1.1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
Dominion	TOP-003-0	R2.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
Dominion	TOP-003-0	R3.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
SPP ORWG	TOP-004-1	R6.	The responsible entity failed to comply with less than 25% of the number of sub-components.	The responsible entity failed to comply with 25% or more and less than 50% of the number of sub-components.	The responsible entity has achieved a measure of performance equal to or below 50% but above 25% of the appropriate measure.	The responsible entity has achieved a measure of performance equal to or below 25% of the appropriate measure.
ATC	TOP-005-1	R1.				The VSL's do not align with the Requirement. The VSL should only address if the TOP has provide the operating data that RC requests. The operating

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						<p>data being request is determined by the RC who is required to perform operational reliability assessment and to coordinate reliability operations. The current VSL seem to indicate that the TOP is in violation if they have not identified operating data that the RC needs to perform its operational reliability assessments and coordination responsibilities. ATC requests that the VSL be rewritten to more accurately identify the TOPs obligation.</p>
<p>ATC</p>	<p>TOP-005-1</p>	<p>R3.</p>				<p>The VSL's do not align with the Requirement. The VSL should only address if the TOP has provide the operating data that is requests. The operating data being request is determined by the other BAs and TOPs who are required to perform operational reliability assessment and to coordinate reliability operations. The current VSL seem to indicate that the TOP is in violation if they have not identified operating data that other BAs and TOPs need to perform their operational reliability assessments and coordination responsibilities. ATC requests that the VSL be</p>

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						rewritten to more accurately identify the TOPs obligation.
Dominion	TOP-005-1	R4.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
Dominion	TOP-006-1	R1.1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
Hydro One	TOP-007-0	R1.		The VSL's for this standard should include details such as % of limit and time duration as the Non-Compliance levels do in the standard.		
Ameren (1)	TPL-001-0	R1.	The responsible entity's implementation/execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details.	The responsible entity's implementation has resulted in the entity being mostly compliant but the execution was insufficient with regard to one or more significant elements.	The responsible entity has implemented the requirement but significant execution failures have occurred that prevented the entity from substantially meeting the objectives of the requirement.	The responsible entity has failed to demonstrate implementation or execution of the program/procedure requirement or directive.
KCPL	TPL-001-0	R1.		The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components and is non-compliant with the long term assessment required in sub-requirement R1.2.	The responsible entity is non-compliant with more than 50% but less than 75% of the sub-components and is non-compliant with the long term assessment required in sub-requirement R1.2.	The responsible entity is non-compliant with 75% or more of the sub-components and sub-requirement R1.2.
SERC — RRS	TPL-001-0	R1.	Change VSL Bin to "Implement" and change criteria to: "The	Change VSL Bin to "Implement" and change criteria to: "The	Change VSL Bin to "Implement" and change criteria to: "The	Change VSL Bin to "Implement" and change criteria to: "The

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			responsible entity's implementation /execution is non-compliant with respect to one or more minor details within the requirement. "	responsible entity's implementation /execution is non-compliant with respect to one significant element within the requirement. "	responsible entity's implementation /execution is non-compliant with respect to more than one significant element within the requirement."	responsible entity's implementation /execution is non-compliant with all the elements of the requirement.
Ameren (1)	TPL-001-0	R2.	The responsible entity's implementation/execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details.	The responsible entity's implementation has resulted in the entity being mostly compliant but the execution was insufficient with regard to one or more significant elements.	The responsible entity has implemented the requirement but significant execution failures have occurred that prevented the entity from substantially meeting the objectives of the requirement.	The responsible entity has failed to demonstrate implementation or execution of the program/procedure requirement or directive.
KCPL	TPL-001-0	R2.		The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components and is non-compliant with sub-requirement R2.1 for the long term planning horizon.	The responsible entity is non-compliant with more than 50% but less than 75% of the sub-components and is non-compliant with sub-requirement R2.1 for the long term planning horizon.	The responsible entity is non-compliant with 75% or more of the sub-components and is non-compliant with sub-requirement R2.1.
SERC — RRS	TPL-001-0	R2.	Change VSL Bin to "Implement" and change criteria to: "The responsible entity's implementation /execution is non-compliant with respect to one or more minor details within the requirement. "	Change VSL Bin to "Implement" and change criteria to: "The responsible entity's implementation /execution is non-compliant with respect to one significant element within the requirement. "	Change VSL Bin to "Implement" and change criteria to: "The responsible entity's implementation /execution is non-compliant with respect to more than one significant element within the requirement."	Change VSL Bin to "Implement" and change criteria to: "The responsible entity's implementation /execution is non-compliant with all the elements of the requirement.
Ameren (1)	TPL-002-0	R1.	The responsible entity's implementation/execution has resulted in meeting the intent of the	The responsible entity's implementation has resulted in the entity being mostly compliant	The responsible entity has implemented the requirement but significant execution	The responsible entity has failed to demonstrate implementation or execution of the

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

Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			requirement but the execution was deficient with respect to minor details.	but the execution was insufficient with regard to one or more significant elements.	failures have occurred that prevented the entity from substantially meeting the objectives of the requirement.	program/procedure requirement or directive.
KCPL	TPL-002-0	R1.		The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components and is non-compliant with the long term assessment required in sub-requirement R1.2.	The responsible entity is non-compliant with more than 50% but less than 75% of the sub-components and is non-compliant with the long term assessment required in sub-requirement R1.2.	The responsible entity is non-compliant with 75% or more of the sub-components and is non-compliant with sub-requirement R1.2.
SERC — RRS	TPL-002-0	R1.	The responsible entity's implementation /execution is non-compliant with respect to one or more minor details within the requirement.	The responsible entity's implementation /execution is non-compliant with respect to one significant element within the requirement.	The responsible entity's implementation /execution is non-compliant with respect to more than one significant element within the requirement.	The responsible entity's implementation /execution is non-compliant with all the elements of the requirement.
Ameren (1)	TPL-002-0	R2.	The responsible entity's implementation/execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details.	The responsible entity's implementation has resulted in the entity being mostly compliant but the execution was insufficient with regard to one or more significant elements.	The responsible entity has implemented the requirement but significant execution failures have occurred that prevented the entity from substantially meeting the objectives of the requirement.	The responsible entity has failed to demonstrate implementation or execution of the program/procedure requirement or directive.
KCPL	TPL-002-0	R2.		The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components and is non-compliant with sub-requirement R2.1 for the long term planning horizon.	The responsible entity is non-compliant with more than 50% but less than 75% of the sub-components and is non-compliant with sub-requirement R2.1 for the long term planning horizon.	The responsible entity is non-compliant with 75% or more of the sub-components and is non-compliant with sub-requirement R2.1.

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

Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
SERC — RRS	TPL-002-0	R2.	The responsible entity's implementation /execution is non-compliant with respect to one or more minor details within the requirement.	The responsible entity's implementation /execution is non-compliant with respect to one significant element within the requirement.	The responsible entity's implementation /execution is non-compliant with respect to more than one significant element within the requirement.	The responsible entity's implementation /execution is non-compliant with all the elements of the requirement.
Ameren (1)	TPL-003-0	R1.	The responsible entity's implementation/execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details.	The responsible entity's implementation has resulted in the entity being mostly compliant but the execution was insufficient with regard to one or more significant elements.	The responsible entity has implemented the requirement but significant execution failures have occurred that prevented the entity from substantially meeting the objectives of the requirement.	The responsible entity has failed to demonstrate implementation or execution of the program/procedure requirement or directive.
KCPL	TPL-003-0	R1.		The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components and is non-compliant with the long term assessment required in sub-requirement R1.2.	The responsible entity is non-compliant with more than 50% but less than 75% of the sub-components and is non-compliant with the long term assessment required in sub-requirement R1.2.	The responsible entity is non-compliant with 75% or more of the sub-components and is non-compliant with sub-requirement R1.2.
SERC — RRS	TPL-003-0	R1.	The responsible entity's implementation /execution is non-compliant with respect to one or more minor details within the requirement.	The responsible entity's implementation /execution is non-compliant with respect to one significant element within the requirement.	The responsible entity's implementation /execution is non-compliant with respect to more than one significant element within the requirement.	The responsible entity's implementation /execution is non-compliant with all the elements of the requirement.
Ameren (1)	TPL-003-0	R2.	The responsible entity's implementation/execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor	The responsible entity's implementation has resulted in the entity being mostly compliant but the execution was insufficient with regard to one or more significant	The responsible entity has implemented the requirement but significant execution failures have occurred that prevented the entity from substantially	The responsible entity has failed to demonstrate implementation or execution of the program/procedure requirement or directive.

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			details.	elements.	meeting the objectives of the requirement.	
KCPL	TPL-003-0	R2.		The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components and is non-compliant with sub-requirement R2.1 for the long term planning horizon.	The responsible entity is non-compliant with more than 50% but less than 75% of the sub-components and is non-compliant with sub-requirement R2.1 for the long term planning horizon.	The responsible entity is non-compliant with 75% or more of the sub-components and is non-compliant with sub-requirement R2.1.
SERC — RRS	TPL-003-0	R2.	The responsible entity's implementation /execution is non-compliant with respect to one or more minor details within the requirement.	The responsible entity's implementation /execution is non-compliant with respect to one significant element within the requirement.	The responsible entity's implementation /execution is non-compliant with respect to more than one significant element within the requirement.	The responsible entity's implementation /execution is non-compliant with all the elements of the requirement.
Ameren (1)	TPL-004-0	R1.	The responsible entity's implementation/execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details.	The responsible entity's implementation has resulted in the entity being mostly compliant but the execution was insufficient with regard to one or more significant elements.	The responsible entity has implemented the requirement but significant execution failures have occurred that prevented the entity from substantially meeting the objectives of the requirement.	The responsible entity has failed to demonstrate implementation or execution of the program/procedure requirement or directive.
KCPL	TPL-004-0	R1.		The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components and is non-compliant with sub-requirement R1.2.	The responsible entity is non-compliant with more than 50% but less than 75% of the sub-components and is non-compliant with sub-requirement R1.2.	The responsible entity is non-compliant with more than 75% of the sub-components and is non-compliant with sub-requirement R1.2.
SERC — RRS	TPL-004-0	R1.	The responsible entity's implementation /execution is non-	The responsible entity's implementation /execution is non-	The responsible entity's implementation /execution is non-	The responsible entity's implementation /execution is non-compliant with all

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			compliant with respect to one or more minor details within the requirement.	compliant with respect to one significant element within the requirement.	compliant with respect to more than one significant element within the requirement.	the elements of the requirement.
KCPL	TPL-004-0	R2.	N/A	No reporting of assessment results for extreme contingency testing was provided.	N/A	N/A
SERC EC DRS	TPL-004-0	R2.	N/A	The responsible entity has demonstrated the reporting of required information but failed to document the results	The responsible entity has documented the results but failed to demonstrate the reporting of required information	The responsible entity has failed to demonstrate the reporting of required information and document the results
KCPL	VAR-001-1	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.			
MISO	VAR-001-1	R1	The responsible entity has demonstrated the reporting of required information but is noncompliant with minor details while still satisfying all significant elements(one incident of failing to report)	The responsible entity has demonstrated the reporting of required information but fails to satisfy at least one significant element." (more than one and five or less incidents of failing to report).	The responsible entity has demonstrated the reporting of required information but fails to satisfy at least one significant element." (more than one and five or less incidents of failing to report).	The responsible entity has failed to report as directed by the requirement (more than ten incidents of failing to report)..
SPP ORWG	VAR-001-1	R1.	The Transmission Operator has demonstrated that formal			

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			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.			
KCPL	VAR-001-1	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 with the exception of 1 report.	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 with the exception of 2 reports.	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 with the exception of 3 reports.	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 with the exception of 4 or more reports.
SPP ORWG	VAR-001-1	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 with the exception of 1 report.	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 with the exception of 2 reports.	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 with the exception of 3 reports.	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 with the exception of 4 or more reports.
KCPL	VAR-001-1	R2.	N/A	N/A	The Transmission Operator failed to acquire the reactive resources within its area needed to protect the voltage levels under contingency conditions including the Transmission Operator's share of the reactive requirements of	The Transmission Operator failed to acquire 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

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
MISO	VAR-001-1	R2	The responsible entity's implementation / execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details.(one percent or less of hours not within voltage schedule).	The responsible entity's implementation / execution is mostly compliant with the requirement but fails to satisfy at least one significant element. (more than one percent and five or less per cent of hours not within voltage schedule)	interconnecting transmission circuits. The responsible entity's implementation / execution is partially compliant with the requirement and fails to satisfy more than one significant element (more than five and less than ten per cent of hours not within voltage schedule).	interconnecting transmission circuits. The responsible entity has failed to demonstrate implementation or execution of the program / procedure requirement or directive (more than ten per cent of hours not within voltage schedule).
MISO	VAR-001-1	R2.1	The responsible entity's implementation / execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details.	The responsible entity's implementation / execution is mostly compliant with the requirement but fails to satisfy at least one significant element.	The responsible entity's implementation / execution is partially compliant with the requirement and fails to satisfy more than one significant element	The responsible entity has failed to demonstrate implementation or execution of the program / procedure requirement or directive
MISO	VAR-001-1	R2.2	The responsible entity's implementation / execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details.	The responsible entity's implementation / execution is mostly compliant with the requirement but fails to satisfy at least one significant element.	The responsible entity's implementation / execution is partially compliant with the requirement and fails to satisfy more than one significant element	The responsible entity has failed to demonstrate implementation or execution of the program / procedure requirement or directive
SPP ORWG	VAR-001-1	R2.	N/A	N/A	The Transmission Operator failed to acquire the reactive resources within its area needed to protect the voltage levels under contingency conditions including the Transmission Operator's share of the reactive requirements of interconnecting	The Transmission Operator failed to acquire 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

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					transmission circuits.	transmission circuits.
KCPL	VAR-001-1	R3.		The Transmission Operator failed to notify at least one generator on the exempt list.	The Transmission Operator failed to maintain its exempt generator list.	
MISO	VAR-001-1	R3.	The responsible entity has demonstrated the reporting of required information but is noncompliant with minor details while still satisfying all significant elements(one incident of failing to report).	The responsible entity has demonstrated the reporting of required information but fails to satisfy at least one significant element." (more than one and five or less incidents of failing to report).	The responsible entity has demonstrated the reporting of required information but fails to satisfy more than one significant element."(more than five and less than ten incidents of failing to report).	The responsible entity has failed to report as directed by the requirement (more than ten incidents of failing to report).
SPP ORWG	VAR-001-1	R3.		The Transmission Operator failed to notify at least one generator on the exempt list.	The Transmission Operator failed to maintain its exempt generator list.	
Entergy (2)	VAR-001-1	R5.	The Purchasing-Selling Entity has arranged for at least 75% of the (self-provide or purchase) reactive resources to satisfy its reactive requirements identified by its Transmission Service Provider.	The Purchasing-Selling Entity has arranged for at least 50% of the (self-provide or purchase) reactive resources to satisfy its reactive requirements identified by its Transmission Service Provider.	The Purchasing-Selling Entity has arranged for at least 25% of the (self-provide or purchase) reactive resources to satisfy its reactive requirements identified by its Transmission Service Provider.	The Purchasing-Selling Entity has arranged for less than 25% of the (self-provide or purchase) reactive resources to satisfy its reactive requirements identified by its Transmission Service Provider.
KCPL	VAR-001-1	R6.		The Transmission Operator was unaware of the status of at least one PSS.	The Transmission Operator was unaware of the status of at least one VR	The Transmission Operator was unaware of the status of at least one PSS and at least one VR.
SPP ORWG	VAR-001-1	R6.		The Transmission Operator was unaware of the status of at least one PSS.	The Transmission Operator was unaware of the status of at least one VR	The Transmission Operator was unaware of the status of at least one PSS and at least one VR.

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
SERC OC SRG	VAR-002-1	R1.	The responsible entity has demonstrated the reporting of required information but is noncompliant with minor details while still satisfying all significant elements(one incident of failing to report) .	The responsible entity has demonstrated the reporting of required information but fails to satisfy at least one significant element." (more than one and five or less incidents of failing to report).	The responsible entity has demonstrated the reporting of required information but fails to satisfy more than one significant element."(more than five and less than ten incidents of failing to report).	The responsible entity has failed to report as directed by the requirement (more than ten incidents of failing to report)..
SOCO Gen	VAR-002-1	R1.	The responsible entity is mostly compliant with minor exceptions. Equivalent score: greater than or equal to 97.5% compliant based on the number of unit-hours of operation.	The responsible entity is mostly compliant with significant exceptions. Equivalent score: greater than or equal to 95% but less than 97.5% compliant based on the number of unit-hours of operation.	The responsible entity is marginal in performance or results. Equivalent score: greater than or equal to 92.5% but less than 95% compliant based on the number of unit-hours of operation.	The responsible entity is poor in performance or results. Equivalent score: less than 92.5% compliant based on the number of unit-hours of operation.
Dominion	VAR-002-1	R2.				See Q2 comment A
SERC OC SRG	VAR-002-1	R2.	he responsible entity's implementation / execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details.(one percent or less of hours not within voltage schedule).	he responsible entity's implementation / execution is mostly compliant with the requirement but fails to satisfy at least one significant element. (more than one percent and five or less per cent of hours not within voltage schedule).	The responsible entity's implementation / execution is partially compliant with the requirement and fails to satisfy more than one significant element (more than five and less than ten per cent of hours not within voltage schedule).	The responsible entity has failed to demonstrate implementation or execution of the program / procedure requirement or directive (more than ten per cent of hours not within voltage schedule).
SOCO Gen	VAR-002-1	R2.	The responsible entity is mostly compliant with minor exceptions. Equivalent score: greater than or equal to 97.5% compliant based on the number of unit-hours of operation.	The responsible entity is mostly compliant with significant exceptions. Equivalent score: greater than or equal to 95% but less than 97.5% compliant based on the number of unit-hours of	The responsible entity is marginal in performance or results. Equivalent score: greater than or equal to 92.5% but less than 95% compliant based on the number of unit-hours of operation.	The responsible entity is poor in performance or results. Equivalent score: less than 92.5% compliant based on the number of unit-hours of operation.

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				operation.		
SERC OC SRG	VAR-002-1	R2.1.	The responsible entity's implementation / execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details.	he responsible entity's implementation / execution is mostly compliant with the requirement but fails to satisfy at least one significant element.	The responsible entity's implementation / execution is partially compliant with the requirement and fails to satisfy more than one significant element	The responsible entity has failed to demonstrate implementation or execution of the program / procedure requirement or directive
SOCO Gen	VAR-002-1	R2.1.	The responsible entity is mostly compliant with minor exceptions. Equivalent score: greater than or equal to 97.5% compliant based on the number of unit-hours of operation.	The responsible entity is mostly compliant with significant exceptions. Equivalent score: greater than or equal to 95% but less than 97.5% compliant based on the number of unit-hours of operation.	The responsible entity is marginal in performance or results. Equivalent score: greater than or equal to 92.5% but less than 95% compliant based on the number of unit-hours of operation.	The responsible entity is poor in performance or results. Equivalent score: less than 92.5% compliant based on the number of unit-hours of operation.
AEP	VAR-002-1	R2.2.	The Generator Operator had one incident of failing to modify voltage as directed.	The Generator Operator had more than one but less than five incidents of failing to modify voltage as directed.	The Generator Operator had more than five but less than ten incidents of failing to modify voltage as directed.	The Generator Operator had ten or more incidents of failing to modify voltage as directed.
Dominion	VAR-002-1	R2.2.	See Q2 comment B	See Q2 comment B	See Q2 comment B	
SERC OC SRG	VAR-002-1	R2.2.	The responsible entity's implementation / execution has resulted in meeting the intent of the requirement but the execution was deficient with respect to minor details.	he responsible entity's implementation / execution is mostly compliant with the requirement but fails to satisfy at least one significant element.	The responsible entity's implementation / execution is partially compliant with the requirement and fails to satisfy more than one significant element	The responsible entity has failed to demonstrate implementation or execution of the program / procedure requirement or directive
SOCO Gen	VAR-002-1	R2.2.		The responsible entity is mostly compliant with the directives of the requirement with one or more significant exceptions.	The responsible entity's implementation / execution was substantially deficient in meeting the directives of the requirement.	
SERC OC	VAR-002-1	R3.	The responsible entity	The responsible entity	The responsible entity	The responsible entity has

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
SRG			has demonstrated the reporting of required information but is noncompliant with minor details while still satisfying all significant elements(one incident of failing to report) .	has demonstrated the reporting of required information but fails to satisfy at least one significant element." (more than one and five or less incidents of failing to report).	has demonstrated the reporting of required information but fails to satisfy more than one significant element."(more than five and less than ten incidents of failing to report).	failed to report as directed by the requirement (more than ten incidents of failing to report)..
SOCO Gen	VAR-002-1	R3.	The responsible entity is mostly compliant with minor exceptions. Equivalent score: greater than or equal to 97.5% compliant based on the number of unit-hours of operation.	The responsible entity is mostly compliant with significant exceptions. Equivalent score: greater than or equal to 95% but less than 97.5% compliant based on the number of unit-hours of operation.	The responsible entity is marginal in performance or results. Equivalent score: greater than or equal to 92.5% but less than 95% compliant based on the number of unit-hours of operation.	The responsible entity is poor in performance or results. Equivalent score: less than 92.5% compliant based on the number of unit-hours of operation.
Dominion	VAR-002-1	R4.				Does not warrant severe VSL
Dominion	VAR-002-1	R4.1.				Does not warrant severe VSL
KCPL	VAR-002-1	R4.1.	Text of this requirement is exclusively explanatory. All explanatory Requirements that have a risk factor assigned to them shall have a VSL of Lower assigned to them	N/A	N/A	N/A
SPP ORWG	VAR-002-1	R4.1.	Text of this requirement is exclusively explanatory. All explanatory Requirements that have a risk factor assigned to them shall have a VSL of Lower assigned to them	N/A	N/A	N/A
AEP	VAR-002-1	R5.	The Generator Owner had one incident of failing	The Generator Owner had more than one but	The Generator Owner had more than five but	The Generator Owner had more than ten incidents of

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Company	Standard	Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			to change transformer tap settings according to specifications provided by the Transmission Operator, unless such actions would violate safety, an equipment rating, a regulatory requirement, or a statutory requirement..	less than five incidents of failing to change transformer tap settings according to specifications provided by the Transmission Operator, unless such actions would violate safety, an equipment rating, a regulatory requirement, or a statutory requirement.	less than ten incidents of failing to change transformer tap settings according to specifications provided by the Transmission Operator, unless such actions would violate safety, an equipment rating, a regulatory requirement, or a statutory requirement.	failing to change transformer tap settings according to specifications provided by the Transmission Operator, unless such actions would violate safety, an equipment rating, a regulatory requirement, or a statutory requirement.
Dominion	VAR-002-1	R5.	See Q2 comment B	See Q2 comment B	See Q2 comment B	Does not warrant severe VSL
AEP	VAR-002-1	R5.1.	The Generator Operator had one incident of failing to notify the Transmission Operator that the Generator Operator can't comply with the Transmission Operator's specifications to change transformer tap settings. (R5)	The Generator Operator had more than one but less than five incidents of failing to notify the Transmission Operator that the Generator Operator can't comply with the Transmission Operator's specifications to change transformer tap settings. (R5)	The Generator Operator had more than five but less than ten incidents of failing to notify the Transmission Operator that the Generator Operator can't comply with the Transmission Operator's specifications to change transformer tap settings. (R5)	The Generator Operator had more than ten incidents of failing to notify the Transmission Operator that the Generator Operator can't comply with the Transmission Operator's specifications to change transformer tap settings. (R5)
Dominion	VAR-002-1	R5.1.	See Q2 comment B	See Q2 comment B	See Q2 comment B	Does not warrant severe VSL
SOCO Gen	VAR-002-1	R5.1.		The responsible entity is mostly compliant with the directives of the requirement with one or more significant exceptions.	The responsible entity's implementation / execution was substantially deficient in meeting the directives of the requirement.	

4. If there any other comments you wish to provide to the SAR Drafting team that you have not already provided in response to the questions above, please provide them here.

Summary Consideration: Many of the comments received on question 4 involved a concern about “double jeopardy” or being sanctioned for the same violation more than once. The VSL DT cannot make any guarantees with respect to the actions of the Compliance Enforcement Authority, however, the NERC Sanctions Guidelines (Paragraph 3.10) which was approved June 7, 2007 states:

“However, in instances of multiple violations related to a single act or common incidence of non-compliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction or remedial action directive bearing reasonable relationship to the aggregate of the related violations.”

We also received comments about use of generic language in the VSLs. We have revised each VSL to eliminate the use of generic language and to make the VSL specific for the requirement. We also received comments with suggestions to improve the guidelines document, the VSL category and the VSLs . These suggestions were incorporated as appropriate.

Commenter	Comment
Ameren	<p>With respect to the assignment of VSL's to a given requirement and subrequirement, it is not clear whether, in some cases, a 'double-jeopardy' situation would occur. For example, in Reliability Standard FAC-001-0, Requirement R2.1. has a set of Violation Severity Levels assigned, as well as do the subrequirements R2.1.1 through R2.1.16. Would a violation of say, R2.1.1 also cause a party to be assessed a violation for R.2.1? The manner in which the Reliability Standards TPL-001-0 through TPL-004-0 are assigned VSL's would appear to be a way to address this issue, with the primary requirements being assigned VSL's (Requirements R1, R2, R3) and the subrequirements being given an Explanatory Text designation. Conversely, VSL's for other standard requirements might be better addressed by assigning VSL's to the subrequirements, while deleting VSL's for the mai requirements. Other standards and requirements for which this apparent 'double-jeopardy' would occur are FAC-002-0, Requirement R1; FAC-008-1, Requirement R1.3; MOD-006-0, Requirement R1; MOD-017-0, Requirement R1; MOD-018-0, Requirement R1; PRC-010-0, Requirement R1, and PRC-011-0, Requirement R1.</p> <p>Also, with respect to Requirement R1 in Reliability Standards TPL-001-0, TPL-002-0, TPL-003-0, and TPL-004-0, there is some apparent inconsistency with the VSL bin assignment for these requirements. In TPL-001-0, this requirement is categorized as 'multi-component', while the same requirement is categorized as 'implement' in TPL-002-0, TPL-003-0, and TPL-004-0. The language for all of these requirements is essentially the same. Therefore, it would appear that all of these requirements should be given the same categorization.</p>
	<p>Response: The VSL DT thanks you for your comment. The VSL DT cannot make any guarantees with respect to the actions of the Compliance Enforcement Authority, however, the NERC Sanctions Guidelines (Paragraph 3.10) which was approved June 7, 2007 states:</p> <p>“However, in instances of multiple violations related to a single act or common incidence of non-compliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction or remedial action directive bearing reasonable relationship to the aggregate of the related violations.”</p> <p>The VSL DT also reviewed the categories for the requirements in the matrix for consistency and modified those that did not match the guideline.</p>
AEP	PER-002-0 R3. Terminology for each VSL should be consistent when possible (i.e., sub-components verses

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Commenter	Comment
	<p>appropriate measure).</p> <p>PER-002-0 R3.4 The existing moderate and High VSL is too subjective and would be difficult to measure or discern from an audit standpoint.</p> <p>PRC-005-1 R1.1 - R1.2 The requirement asks for the maintenance and testing intervals and basis not the implementation. R2.1 addresses the implementation.</p> <p>PRC-017 R1.1.1 - R1.5 Disagree with the interpretation of what the VSL is evaluating for this item. Either there is a program identifying this equipment or there is not. The program implementation is addressed in R1.6 and R2.</p> <p>PRC-018-1 R6.1 - The requirement asks for the maintenance and testing procedures but does not ask about the implementation. This is covered in R2.1</p> <p>PRC-018-1 R6.2 - The requirement asks for the maintenance and testing procedures but does not ask about the implementation. This is covered in R2.1</p>
<p>Response: The VSL DT thanks you for your comments. PER-002 had VSLs assigned by an existing Standards Drafting Team based on the content of the requirement and their subject matter expertise. Going forward, this is how the VSL DT envisions VSLs will be assigned. The VSL DT reviewed the categories for the requirements in the matrix for consistency and modified those that did not match the guideline.</p>	
Avista	<p>As stated above, my concern is that the individual drafting teams use the same VSL Guidelines when drafting or revising Standards. There needs to be consistency when different groups are working on the same issues. I recommend that when it comes to the VSL, the VSL Drafting Team and the Standard Drafting Teams come to an agreement on the VSL before they are proposed.</p> <p>The approach that the drafting team has taken seems to be reasonable in identifying levels of severity.</p>
<p>Response: The VSL DT thanks you for your comment. Going forward, the Standards Drafting Teams will assign VSLs to all requirements based on the content of the requirement and their technical expertise.</p>	
Chelan County PUD #2	<p>A number of the requirements in the matrix have used the general format from the severity level development guideline. We urge NERC to make all VSLs specific, editing the general format where needed to fit each specific requirement. This would aid both in understanding and applicability. The general format does not work for every requirement. Standard COM-002-2, R2 above is used an example.</p> <p>The VSL matrix is a good start but there is work still to be done. Since the timeline set by FERC for approval is very short we support approval of these VSLs in their current state, expecting that work will continue at the drafting team level to improve, change or remove the severity levels as appropriate for each requirement.</p>
<p>Response: The VSL DT thanks you for your comment. We have revised the general format VSLs to use specific language for each requirement.</p>	
Dominion	<p>"We recommended severe VSL is not warrant when it is applied to requirement vs. the sub requirement."</p> <p>What differentiates FAC-009 from FAC-008? Leaves the schedule up to the requesting party. Should be a finite requirement similar to FAC standards.</p> <p>How does a SPS in PRC-017 differ from Protective Relay system in PRC-05?</p> <p>CIP-001-1 Sabatoge can't readily be determined by GO. Events need to be assessed by corporate security in conjunction with local, state & possibly federal law enforcement. Adoption of this standard will result in most events of destruction being classified as sabatoge to avoid and potential violations.</p> <p>EOP-004-1 Federal and state standards/codes of conduct may prohibit GO/LSE from having access to data necessary to perform analysis. Standard should require the entity to submit required data to its TO or RA within prescribed</p>

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Commenter	Comment
	<p>time.</p> <p>MOD-017-0 R1.2 to R1.4, MOD-018-0 R1.1 to R1.3, MOD-019-0 R1. In many markets, the LSE is merely supplying energy and possibly capacity for an undetermined period of time. This is especially true for retail aggregators. The standard should apply to the transmission or distribution owner to which the load is connected. Requirement to provide this data to the facility owner should be included in the Interconnection Agreement.</p> <p>PRC-022-1 R1 Federal and state standrds/codes of conduct may prohibit GO/LSE from having access to data necessary to perform analysis.</p> <p>VAR-001-1 R5 FERC order 888 already requires this. If this is a NERC standard to cover PSEs in TP areas without a FERC OATT? Should not warrant severe VSL</p>
<p>Response: The VSL DT thanks you for your comments. The scope of this team only relates to the assignment of VSLs for the existing regulatory approved standards. Any other modification (including duplication of requirements in separate standards and interpretation of standards) to the standards will require the commenter to submit a separate SAR or a request for an interpretation of a standard, in accordance with the NERC Standards Development Process.</p>	
Entergy (1)	<p>Entergy is concerned with the possible imposition of two penalties for the violation of one requirement. Some may refer to this situation as "double-jeopardy". The situation arises from the combination of NERC Requirements having sub-requirements, and, FERC Order RR06-1-007, paragraph 80, requiring NERC to place VSLs on each Requirement and each sub-requirements. The situation is also reflected in these draft VSL Development Guidelines Criteria - Multi-Component Criteria. A penalty will be levied for violation of a sub-requirement. And then a second penalty will be levied based on the requirement itself as a result of one or more of the sub-requirements being violated. We believe this is inappropriate and suggest the practice be changed.</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT cannot make any guarantees with respect to the actions of the Compliance Enforcement Authority, however, the NERC Sanctions Guidelines (Paragraph 3.10) which was approved June 7, 2007 states:</p> <p style="padding-left: 40px;">"However, in instances of multiple violations related to a single act or common incidence of non-compliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction or remedial action directive bearing reasonable relationship to the aggregate of the related violations."</p>	
Entergy (2)	<p>We appreciate the opportunity to comment on the development guidelines and the proposed VSLs. Review of the VSLs reveals several requirements that appear to be duplicative and imply that multiple penalties would be assessed for a single event. This is not a VSL issue but rather one that identifies the need to speed up the process by which the standards are modified so that areas of vagueness, duplicity and inconsistency can be resolved.</p>
<p>Response: The VSL DT thanks you for your comment. The VSL DT cannot make any guarantees with respect to the actions of the Compliance Enforcement Authority, however, the NERC Sanctions Guidelines (Paragraph 3.10) which was approved June 7, 2007 states:</p> <p style="padding-left: 40px;">"However, in instances of multiple violations related to a single act or common incidence of non-compliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction or remedial action directive bearing reasonable relationship to the aggregate of the related violations."</p>	
FirstEnergy	<p>With regard to the application of the VSL Development Guidelines Criteria, it appears that many (~50%) of the VSLs reflect the generic language stated in the guideline. The VSLs should be tailored to reflect more specific information and the proposed wording introduces a high level of subjectivity as to what are "minor" or "major" elements of a requirement. This does not provide clear direction for both the auditor assessing compliance to the requirement or</p>

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Commenter	Comment
	<p>for the responsible entity that must adhere to the requirement.</p> <p>The VSLs provided for the "INT" suite of standards often reflect how many times a responsible entity has missed a particular requirement as to what constitutes the VSL. This approach does not seem to reflect the information in the guideline document.</p> <p>Under the Background section (first paragraph, second sentence) it is suggested that the words "As of the date of this manual," be added at the beginning of the sentence. The sentence currently begins "FERC has approved 83...".</p>
	<p>Response: The VSL DT thanks you for your comment. The VSL DT gathered input from existing drafting teams to assign the VSLs. As you point, out many were left in the generic VSL language and these have been modified so they are requirement-specific. Going forward, it is envisioned that Standards Drafting Teams will assign VSLs based on the guidelines document and their technical expertise.</p> <p>The VSL DT assigned VSLs in line with existing levels of non-compliance. The guideline document stated that existing levels of non-compliance were to be used when appropriate. Although levels of non-compliance were intended to identify the reliability-related risk of a violation, in many cases the levels of non-compliance that were developed for Version 0 standards assessed how badly a requirement was missed, and it is appropriate to consider translating these levels of non-compliance into VSLs.</p> <p>We have modified the guideline to remove the sentence.</p>
Hydro One	<p>Where requirements are general and do not have specific measurables, how are minor and significant details or elements monitored? Basically, what constitutes a minor element (the date?) and what is a significant element? The way many of the VSLs are currently worded they are subject to interpretation. The VSL descriptions need to reflect the actual requirement in detail. For example, FAC-002-0 R2 states that (1) the entity must retain documentation of the evaluation for 3 years and (2) provide the documentation on request (30 calendar-days). The 4 VSL descriptions need to be more specific to reflect non-compliance of these two components in the requirement. An example of good VSL descriptions is for FAC-008-1 R1 & R1.2.2 where they reflect the exact wording of the requirements.</p> <p>Review VSL Bin criteria for appropriateness. Often a requirement is in a multi-component bin however it does not have sub-components or sub-requirements. Also be consistent, if a requirement has sub-requirements, do not call them sub-components.</p> <p>Clarify EOP-001-0 R5 on how the % non-compliance is determined. Currently having one of the applicable elements of the Attachment not addressed produces a Level 1 non-compliance. As it is proposed in the VSLs, having as much as 20% of that attachment list not addressed gives a non-compliance of Lower VSL which is equivalent to three applicable elements not addressed. The new VSL levels are more lenient in this case.</p> <p>Often VSL's are based on meeting timelines for requests where the requirement does not specify a number of calendar days a request is due. For the flip-side, often VSL's are not based on meeting a timeline request and the requirement includes a specific number of calendar days that a request must be fulfilled.</p> <p>Recommend that the "Measures" outlined in the standard should be coupled and coordinated with the VSLs.</p>

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Commenter	Comment
	<p>Response: The VSL DT thanks you for your comment. It is envisioned that guidelines will be used by Standards Drafting Teams to develop specific VSLs for each requirement going forward. They will employ their technical expertise to determine "minor" and "significant" details. The VSL DT reviewed all requirements and bins for appropriateness and modified those that did not conform to the guideline. The existing Standards Drafting Team developed the VSLs based on their technical expertise for EOP-001-0, R5. This is the process as envisioned by the VSL DT. The VSLs are different than the levels of non-compliance and can not be compared based on leniency. We concur that the measures should be considered, along with the guidelines and requirements, in developing VSLs.</p>
<p>IRC SRC</p>	<p>NERC must consider revising the FERC approved standards that were based on the "Version 0" reliability standards. In the effort to develop Version 0 standards, the industry was held to maintaining the intent and language of the then in effect voluntary NERC Policies with no opportunity to revise the standards into a form that would be more relevant to a mandatory enforcement compliance structure. The SRC believes it is increasingly difficult to develop clear and enforceable standards that include the criteria the FERC expects to have without revising the old "Version 0" language. The SRC believes effective standards should allow registered entities to comply and direct their resources on actions that have relevance and benefit to the system. NERC can aid the industry in achieving these objectives by beginning an effort to review all the NERC standards and ensure that requirements with potential compliance penalties are indeed the most important requirements for continued reliability.</p>
	<p>Response: The VSL DT thanks you for your comment. We concur that there are issues with existing standards. The appropriate venue to correct these issues is through the Standards Development Process. We encourage the commenter to create SAR(s) to correct any issues that they have discovered. NERC has a Standards Work Plan that will provide for the revision of all standards over the next three years.</p>
<p>JEA</p>	<p>We should not allow the FERC deadline to cause us to slap together poorly thought out VSL's. It will only serve to add to the confusion and uncertainty that already exists around compliance with and enforcement of standards.</p>
	<p>Response: The VSL DT thanks you for your comment. The draft VSLs are being modified to more specific language that will provide quality VSLs.</p>
<p>KCPL</p>	<p>BAL-002-0, R4.1 should be category N/A similar to R4.2. BAL-003-0, the sub-requirements of R2 are explanatory text to support the main requirement R2. BAL-003-0, R1 and R5.1 can penalize an entity twice for basically the same violation. The way this was initially proposed, an entity could fail R1 entirely at the most severe VSL discover the problem and correct and get another VSL in R5.1. It is suggested to make the VSL for R1 a Lower VSL since the substance of maintaining a good frequency bias setting is represented by R5.1. BAL-004-0, the sub-requirements of R3 are explanatory text to support the main requirement R3. It should be noted there are no proposed VSL's for BAL-004-0, R3.2 as this was overlooked. COM-001-1, R2 should be Execution not Multi-Component. The requirement does not have sub-requirements. COM-001-1, R3 should be Coordination not Multi-Component. The requirement does not have sub-requirements. COM-002-2, R2 should be Execution not Multi-Component. The requirement does not have sub-requirements. COM-001-1, R6 should be Program not Multi-Component. The requirement does not have sub-requirements. EOP-001-0, R3 should be N/A through all VSL levels since there are VSL's for the sub-requirements of R3. Should not be penalized in the main requirement and then again in the sub-requirement for the same problem. EOP-001-0, R4 should be N/A through all VSL levels since there are VSL's for the sub-requirements of R4. Should not be penalized in the main requirement and then again in the sub-requirement for the same problem. EOP-001-0, R7 should be N/A through all VSL levels since there are VSL's for the sub-requirements of R7. Should</p>

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Commenter	Comment
	<p>not be penalized in the main requirement and then again in the sub-requirement for the same problem.</p> <p>EOP-002-2, R6 has appropriate VSL's, but the VSL levels for the sub-requirements of R6 should be N/A. Should not be penalized in the main requirement and then again in the sub-requirement for the same problem.</p> <p>EOP-002-2, R7 has appropriate VSL's, but the VSL levels for the sub-requirements of R7 should be N/A. Should not be penalized in the main requirement and then again in the sub-requirement for the same problem.</p> <p>EOP-005-1, the sub-requirements of R11 really provide the substance for the main requirement R11. Subsequently, the VSL's for R11 should all be N/A. The requirements R11.5.x are explanatory and the VSL's for all these should be N/A.</p> <p>EOP-008-0, R1 has appropriate VSL's, but the VSL levels for the sub-requirements of R1 should be N/A. Should not be penalized in the main requirement and then again in the sub-requirement for the same problem.</p> <p>INT-003-2, R1.1 should have VSL's of N/A as R1.1 is included in the VSL's in main requirement R1. To have VSL's for R1.1 penalizes an entity twice for the same problem.</p> <p>PRC-001-1, R2 should be N/A through all VSL levels since there are VSL's for the sub-requirements of R2. Should not be penalized in the main requirement and then again in the sub-requirement for the same problem.</p> <p>PRC-011-0, all the sub-requirements under R1 are explanatory text.</p> <p>VAR-001-1, R9 should be multi-component</p> <p>VAR-001-1, R9.1 should be N/A</p> <p>VAR-001-1, R10 should be Reporting</p> <p>TOP-001-1, R7 should be multi-component</p> <p>TOP-001-1, R7.x should all be N/A</p> <p>TOP-002-2, R14 should be multi-component</p> <p>TOP-002-2, R14.x should be N/A</p> <p>TOP-002-2, R16 should be muti-component</p> <p>TOP-002-2, R16.x should be N/A</p> <p>TOP-004-1, R6 should be multi-component</p> <p>TOP-006-1, R1 should be N/A for all VSL's as VSL's are in the subcomponents</p>
	<p>Response: The VSL DT thanks you for your comment. The VSL DT reviewed the categories for the requirements in the matrix for consistency and modified those that did not match the guideline.</p> <p>The VSL DT cannot make any guarantees with respect to the actions of the Compliance Enforcement Authority, however, the NERC Sanctions Guidelines (Paragraph 3.10) which was approved June 7, 2007 states:</p> <p>“However, in instances of multiple violations related to a single act or common incidence of non-compliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction or remedial action directive bearing reasonable relationship to the aggregate of the related violations.”</p>
Manitoba Hydro	<p>Manitoba Hydro is not happy with the Violation Severity Levels (VSL) Development Guideline Criteria or the proposed VSL Matrix as they are written. The VSL Development Guidelines Criteria lacks sufficient guidance in the application of the guideline for Drafting Teams or a clear picture of the future implementation of the guideline in assessing penalties. We feel the VSL Drafting Team needs stronger leadership from NERC to ensure consistency and fairness in</p>

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Commenter	Comment
	<p>the application of VSL's. This inconsistency is evident when you review the the draft VSL's for each Standard. If NERC can't produce a better guideline document and a better draft VSL Matrix, then FERC will surely get involved and do it for the industry.</p> <p>In general, the VSL Development Guidelines Criteria exposes the weaknesses in the standards development process. The Standards were not written in a way to accommodate VSL's, which is one reason why the draft VSL's are not consistently applied across all the standards. Manitoba Hydro believes that the Standards must be re-written to make it possible to apply the VSL concept consistently and equitably across all the standards and the RRO's.</p> <p>We have a concern that balloting all the VSLs in one package will result in some bad or poor results for some standards. The industry should no longer be accepting poor standards or in this instance a VSL matrix for the sake of getting a large number of standards dealt with at the same time as happened with the Violation Risk Factors. The standard drafting team should seek a process which will effectively weed out poor results (or those that are difficult to deal with) identified by stakeholders comments. We recommend a separate ballot for each standard. This process may take a little longer but the end result will be worth the time and effort. If necessary request a dead line extension from FERC. Once consensus is reached on the severity levels for a given standard, that standard should be revised to clean up the requirements, violation risk factors, and the violation severity levels - and not leave the violation severity level matrix and violation risk factor matrix as stand alone documents for several years. Let's aim to get good quality stand alone standards. We feel that if these documents were presented to FERC as is, FERC would throw them out and become more involved in the up front process.</p> <p>Given the problems that exist with the guideline document, Manitoba Hydro has chosen not to provide detailed comments on the draft individual VSL's for each standard. There is little value in providing detailed comments until an improved methodology document exists and the draft VSL's are reviewed and updated.</p>
	<p>Response: The VSL DT thanks you for your comment. The FERC has mandated that the VSLs be filed by March 1, 2008 (paragraph 80 of the Order, docket number RR06-1-007). We concur that there are issues with the current standards that do not make the first cut at VSLs optimal, and the VSL DT used stakeholder comments to modify the generic VSLs to make them more requirement-specific.</p> <p>The VSL Guidelines document is designed to provide the Standards Drafting Team with a method to assist in assigning VSLs to requirements – it was not intended for use by the Compliance Enforcement Authorities.</p> <p>It is envisioned that the SDTs will use their expertise to develop technically excellent VSLs based on the guidelines, the requirements, and the measures. This will be done through the Standards Development Process. NERC has a work plan to review and revise all standards over the next three years. Your participation in this process is encouraged.</p> <p>The VSL DT has given some consideration to the method for balloting the proposed VSLs. There are many pros and cons to the various groupings for balloting. One major concern against balloting each individual standard is being able to have a quorum for each ballot. This would require 740 individual ballots.</p>
MRO NSRS	<p>The VSL Guideline is a guideline used to establish a consistent classification of VSLs across all NERC Reliability Standards and it is understood that this document will be somewhat generic and still fulfill its mission. However, the VSLs in the Reliability Standards for the individual Requirements should not be so generic. Terms such as "minor" and "significant" are hard to quantify and therefore should be avoided in the VSL classifications in the individual standards. Since every Requirement has a set of VSLs associated with it, it only seems appropriate that the VSLs are very specific to what is written in the standard (but do not go beyond it). Here is an example:</p> <p>Example</p>

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Committer	Comment
	<p>CIP-001-1 Sabotage Reporting – Requirement 1</p> <p>R1. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall 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.</p> <p>There seems to be 2 “significant elements” in this Requirement:</p> <ol style="list-style-type: none"> 1. procedures for the recognition of sabotage events and 2. procedures for making the operating personnel aware of sabotage events <p>According to the VSL guideline the VSLs for this Requirement should be:</p> <p>VSL Lower – The responsible entity’s document does not address multi site sabotage.</p> <p>VSL Moderate - The responsible entity’s document lacks either the procedures for recognition of sabotage events OR procedures for making operating personnel aware of sabotage events.</p> <p>VSL High - The responsible entity’s document lacks both the procedures for recognition of Sabotage events AND procedures for making operating personnel aware of sabotage events.</p> <p>VSL Severe - The responsible entity does not have a document.</p>
	<p>Response: The VSL DT thanks you for your comment. It is envisioned that guidelines will be used by Standards Drafting Teams to develop specific VSLs for each requirement going forward. They will employ their technical expertise to determine “minor” and “significant” details. The VSL DT modified the generic VSLs to make them more requirement-specific.</p>
PJM	<p>Supplemental Comments from PJM for the new nuclear standard, NUC-001-1, are provided under separate cover.</p>
	<p>Response: The VSL DT thanks you for your comment. We will review and respond to the comments received on NUC-001-1.</p>
SERC EC DRS	<ol style="list-style-type: none"> 1.) For FAC-001 R2 and various other requirements, a value of exactly 25% is overlapped in both the Lower and Moderate VSL. Recommend that the Lower VSL be defined as less than 25%. 2.) With respect to the assignment of VSL's to a given requirement and subrequirement, it is not clear whether, in some cases, a 'double-jeopardy' situation would occur. For example, in Reliability Standard FAC-001-0, Requirement R2.1. has a set of Violation Severity Levels assigned, as well as do the subrequirements R2.1.1 through R2.1.16. Would a violation of say, R2.1.1 also cause a party to be assessed a violation for R.2.1? The manner in which the Reliability Standards TPL-001-0 through TPL-004-0 are assigned VSL's would appear to be a way to address this issue, with the primary requirements being assigned VSL's (Requirements R1, R2, R3) and the subrequirements being given an Explanatory Text designation. Conversely, VSL's for other standard requirements might be better addressed by assigning VSL's to the subrequirements, while deleting VSL's for the main requirements. Other standards and requirements for which this apparent 'double-jeopardy' would occur are FAC-002-0, Requirement R1; FAC-008-1, Requirement R1.3; MOD-006-0, Requirement R1; MOD-017-0, Requirement R1; and MOD-018-0, Requirement R1. 3.) The terms "mostly compliant" and "substantially deficient" should be replaced with more measurable terms.
	<p>Response: The VSL DT thanks you for your comment. 1) We have corrected the values.</p>

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Commenter	Comment
	<p>2) The VSL DT cannot make any guarantees with respect to the actions of the Compliance Enforcement Authority, however, the NERC Sanctions Guidelines (Paragraph 3.10) which was approved June 7, 2007 states:</p> <p style="padding-left: 40px;">“However, in instances of multiple violations related to a single act or common incidence of non-compliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction or remedial action directive bearing reasonable relationship to the aggregate of the related violations.”</p> <p>3) The guidelines document provides guidance to the Standards Drafting Teams. They will use their technical expertise, the VRF, the requirement and measures to determine items such as “mostly compliant”.</p>
SERC EC PSS	<p>For FAC-001 R2 and various other requirements, a value of exactly 25% is overlapped in both the Lower and Moderate VSL. Recommend that the Lower VSL be defined as less than 25%.</p> <p>With respect to the assignment of VSL's to a given requirement and subrequirement, it is not clear whether, in some cases, a 'double-jeopardy' situation would occur. For example, in Reliability Standard FAC-001-0, Requirement R2.1. has a set of Violation Severity Levels assigned, as well as do the subrequirements R2.1.1 through R2.1.16. Would a violation of say, R2.1.1 also cause a party to be assessed a violation for R.2.1? The manner in which the Reliability Standards TPL-001-0 through TPL-004-0 are assigned VSL's would appear to be a way to address this issue, with the primary requirements being assigned VSL's (Requirements R1, R2, R3) and the subrequirements being given an Explanatory Text designation. Conversely, VSL's for other standard requirements might be better addressed by assigning VSL's to the subrequirements, while deleting VSL's for the main requirements. Other standards and requirements for which this apparent 'double-jeopardy' would occur are FAC-002-0, Requirement R1; FAC-008-1, Requirement R1.3; MOD-006-0, Requirement R1; MOD-017-0, Requirement R1; and MOD-018-0, Requirement R1.</p> <p>With respect to Requirement R1 in Reliability Standards TPL-001-0, TPL-002-0, TPL-003-0, and TPL-004-0, there is some apparent inconsistency with the VSL bin assignment for these requirements. In TPL-001-0, this requirement is categorized as 'multi-component', while the same requirement is categorized as 'implement' in TPL-002-0, TPL-003-0, and TPL-004-0. The language for all of these requirements is essentially the same. Therefore, it would appear that all of these requirements should be given the same categorization.</p>
	<p>Response: The VSL DT thanks you for your comment. 1) We have corrected the values.</p> <p>2) The VSL DT cannot make any guarantees with respect to the actions of the Compliance Enforcement Authority, however, the NERC Sanctions Guidelines (Paragraph 3.10) which was approved June 7, 2007 states:</p> <p style="padding-left: 40px;">“However, in instances of multiple violations related to a single act or common incidence of non-compliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction or remedial action directive bearing reasonable relationship to the aggregate of the related violations.”</p> <p>3) We concur that the categories among the TPL standards were not aligned properly. We have reviewed all of the requirements and modified those that did not conform to the guidelines.</p>
SERC OC SRG	<p>For FAC-001 R2 and various other requirements, a value of exactly 25% is overlapped in both the Lower and Moderate VSL. Recommend that the Lower VSL be defined as less than 25%.</p> <p>With respect to the assignment of VSL's to a given requirement and subrequirement, it is not clear whether, in some cases, a 'double-jeopardy' situation would occur. For example, in Reliability Standard FAC-001-0, Requirement R2.1. has a set of Violation Severity Levels assigned, as well as do the subrequirements R2.1.1 through R2.1.16. Would a violation of say, R2.1.1 also cause a party to be assessed a violation for R.2.1? The manner in which the</p>

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Commenter	Comment
	<p>Reliability Standards TPL-001-0 through TPL-004-0 are assigned VSL's would appear to be a way to address this issue, with the primary requirements being assigned VSL's (Requirements R1, R2, R3) and the subrequirements being given an Explanatory Text designation. Conversely, VSL's for other standard requirements might be better addressed by assigning VSL's to the subrequirements, while deleting VSL's for the main requirements. Other standards and requirements for which this apparent 'double-jeopardy' would occur are FAC-002-0, Requirement R1; FAC-008-1, Requirement R1.3; MOD-006-0, Requirement R1; MOD-017-0, Requirement R1; and MOD-018-0, Requirement R1.</p> <p>With respect to Requirement R1 in Reliability Standards TPL-001-0, TPL-002-0, TPL-003-0, and TPL-004-0, there is some apparent inconsistency with the VSL bin assignment for these requirements. In TPL-001-0, this requirement is categorized as 'multi-component', while the same requirement is categorized as 'implement' in TPL-002-0, TPL-003-0, and TPL-004-0. The language for all of these requirements is essentially the same. Therefore, it would appear that all of these requirements should be given the same categorization.</p> <p>The VSL Development Guideline document does not address the variety of ways in which sub-requirements have been used in standards and needs to be revised to do so. In that document sub-requirements are mentioned almost exclusively in connection with multi-component requirements, and even in that situation no guidance is given on whether the sub-requirements that are part of a multipoint requirement should have an independent VSL. No guidance at all is given on sub-requirements that do not fit the multi-component pattern.</p> <p>In many cases the "parent" requirement merely sets up a list of sub-requirements (see EOP-001 R3 "Each Transmission Operator and Balancing Authority shall:"). In other cases the "parent" requirement has the core information and the sub-requirements add further depth and deal with specific situations (see EOP-004 R3). Yet virtually all of these situations (at least within the EOP standards) are dealt with by making the "parent" requirement a multi component and establishing VSLs to both the parent and sub-requirements. I believe this will virtually assure "double jeopardy". Additional requirements where the "double jeopardy" issue could arise within the EOP standards include:</p> <p>EOP-001 R3, R4, and R7 EOP-002 R6, R7, R9 EOP-004 R3 EOP-005 R10, R11 EOP-008 R1</p>
	<p>Response: The VSL DT thanks you for your comment. 1) We have corrected the values.</p> <p>2) The VSL DT cannot make any guarantees with respect to the actions of the Compliance Enforcement Authority, however, the NERC Sanctions Guidelines (Paragraph 3.10) which was approved June 7, 2007 states:</p> <p style="padding-left: 40px;">"However, in instances of multiple violations related to a single act or common incidence of non-compliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction or remedial action directive bearing reasonable relationship to the aggregate of the related violations."</p> <p>3) We concur that the categories among the TPL standards were not aligned properly. We have reviewed all of the requirements and modified those that did not conform to the guidelines.</p> <p>4) Every requirement and sub-requirement that has a VRF must be assigned a VSL per the FERC Order, regardless of the category.</p>

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Commenter	Comment
SERC RRS	Good start at clarification between reporting and communication.
Response: The VSL DT thanks you for your comment.	
SC Gen	<p>General Comment #1: It seems as if the drafting team simply applied the "generic" guidance in the VSL guidance document with little or no consideration to the actual standard requirements. For example, many requirements only have one or two "significant" elements as written, so they cannot have a Moderate, High, and Severe VSL if you strictly abide by the VSL Development Guidelines. In these cases, the VSL should clearly specify how Lower, Moderate, High, and Severe should be differentiated. Similarly, there is no indication in either the standard or the RSAWs (where such RSAWs exist) regarding a "minor" non-compliance so for many standard requirements, this must be inferred. SCGen is concerned that "minor" vs. "significant" will be subjectively determined by the audit team rather than objectively stated on a per standard basis. This approach by the standard drafting team is fundamentally flawed and reflected throughout the standards and can put the industry in a precarious position. Therefore, terms like "minor" and "significant" must be defined if used in the VSLs. Instead, the VSL language should be as specific as possible based on the language in each requirement. To provide an example of what it believes should be done, SCGen offers proposed alternate language for a few select standards. However, SCGen can not presume to properly draft proper VSLs for all of these standards on their own. Thus, the standard drafting team should re-draft these VSLs, explicitly stating what is expected to receive a given level of non-compliance for that standard. (for an example, see what SCGen suggested for EOP-004-1 R3.1). SCGen believes the drafting team's basic approach is overly generic and too ambiguous to avoid a predominance of subjectivity and discretion on the part of the auditors.</p> <p>General Comment #2: Several of the proposed VSLs use language such as "Such deficiencies would not impact the achievement of the objective requirement". SCGen strongly opposes this kind of language in a "VIOLATION SEVERITY LEVEL". If it does not impact the achievement of the objective requirement, then it is not a violation... and if it really could be considered a violation but does not impact the achievement of the objective requirement, then it shouldn't be a requirement against which a Violation Risk Factor is assessed, or the requirement needs to be rewritten to clearly show its reliability impact. It would be best for these standards to be remanded by to their respective SDT for revision. Absent that, the VSLs should be modified so that there is no "violation" for something that does not impact the objective.</p> <p>General Comment #3: COM-002 does NOT meet the requirements for "Multi-Component" according to the specifications outlined in the VSL Development Guidelines.</p> <p>General Comment #4: With respect to EOP-004 R2. There is no definition for "promptly" and the requirement only says to perform an analysis. Therefore, on what basis will compliance be measured since there are no indications as to what may be "minor" or "significant". Plus, what "elements" are required when the standard simply says to perform an analysis, but does not say how such analysis should be performed. Additionally, no RSAW exists to clarify how compliance will be measured. However, based on other RSAWs, it is likely that an auditor would only check to see if the analysis was performed.</p> <p>General Comment #5: With respect to EOP-004 R3 and R3.1. Every aspect of R3 is encompassed in the detail of R3.1. therefore, R3 should have no specific applicability. This particular requirement was actually one of the examples used in the VSL guidance document. SCGen does not understand why the standard team did not simply</p>

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Commenter	Comment
	<p>use the example provided in the VSL guidance document, which was considerably less ambiguous than the language proposed.</p> <p>General Comment #6: With respect to FAC-002 R1 and sub-requirements. This standard looks like it would more appropriately be classified as "multi-Component".</p> <p>General Comment #6: With respect to FAC-008 R1 and sub-requirements. This standard looks like it would more appropriately be classified as "multi-Component".</p> <p>General Comment #6: With respect to INT-004 R2 and subcomponents. This standard should not be "multi-Component" because the list of "sub-items" are conditions, not requirements. It is a list showing all the various circumstances requiring an update to the tag; it is NOT a list of multiple requirements associated with updating the tag.</p> <p>General Comment #7: PRC-005 R1 is not explanatory text.</p> <p>General Comment #8: PRC-017 R1 and subcomponents would more appropriately be classified as "Multi-Component"</p> <p>General Comment #9: PRC-018 R3 and subcomponents would more appropriately be classified as "Multi-Component"</p> <p>General Comment #10: With respect to TOP-003-0 R2, the reference to the auto voltage regulator and supplementary control should be retired as was done with TOP-002-2 R14.2 since it is covered in VAR-001 and VAR-002.</p> <p>General Comment #11: With respect to VAR-002-1 R1, R2, R2.1, R3, some generator owners have 300 generators, some have 1. Thus, the VSLs should be based on % compliance, not on the number of incidents.</p>
	<p>Response: The VSL DT thanks you for your comment. 1) The VSL DT collaborated with existing Standards Drafting Teams to develop specific VSLs. Where a response from the SDT was received, their proposed VSL was used. It is envisioned that guidelines will be used by Standards Drafting Teams to develop specific VSLs for each requirement going forward. They will employ their technical expertise to determine "minor" and "significant" details. 2) An auditor will have already determined that a violation exists. The VSL will represent how far off the mark the entity is. 3) We have reviewed the categories for each requirement and changed those that do not conform to the guidelines. 4) It is envisioned that guidelines will be used by Standards Drafting Teams to develop specific VSLs for each requirement going forward. They will employ their technical expertise to determine "minor" and "significant" details. The RSAW is a tool used by compliance personnel and is not in the scope of this project. 5) The examples used in the guideline document are for illustrative purposes only. Existing Standard Drafting Teams were consulted for their input on specific VSLs. 6-9) We have reviewed the categories and changed those that did not conform to the guidelines. 10) This is outside the scope of the VSL DT. We recommend that you submit a SAR to correct this. 11) This is a compliance issue. We have forwarded your comment NERC Compliance Staff.</p>
SOCO Trans	Comment #1: The use of the phrasings "minor details within the requirement" and "significant element(s) within the

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Commenter	Comment
	<p>requirement" offer no specificity with regard to the definitional language for Violation Severity Levels - "... defined as measurements of the degree to which an entity violated a requirement of a reliability standard." There is no quantitative "bright line" that differentiates "minor" from "significant."</p> <p>Comment #2: Explanatory text is useful when a requirement needs further explanation or clarification. The proper placement of explanatory text is within an actual requirement, not as a stand-alone "requirement." For example, using the case given for an explanatory requirement [FAC-003-1 / Requirement 3.2 on page 27 of the Violations Severity Levels Development Guidelines Criteria dated October 10, 2007], the requirement states that a certain response is not required. How is this a requirement? How is this measured? What is the threat to reliability? Regardless of the inability to answer any of this and notwithstanding the inability to determine how a violation may have occurred, this "requirement" still carries a base penalty range of \$1,000 - \$3,000 should you ever be able to determine if a violation occurred.</p> <p>Standards utilizing explanatory requirements should be remanded back to their respective drafting teams, if active, or addressed by the Standards Committee for action to revise these standards such that explanatory "requirements" are no longer employed.</p> <p>Comment #3: NERC and the Standards Committee should consider an extended (beyond 45 days) comment period when placing projects of this magnitude out for comment in order to effect a proper vetting.</p>
	<p>Response: The VSL DT thanks you for your comment. 1) The VSL DT collaborated with existing Standards Drafting Teams to develop specific VSLs. Where a response from the SDT was received, their proposed VSL was used. It is envisioned that guidelines will be used by Standards Drafting Teams to develop specific VSLs for each requirement going forward. They will employ their technical expertise to determine "minor" and "significant" details. 2) Based on comments from stakeholders, the VSL DT has reviewed all requirements listed as Explanatory Text to see whether another category was more appropriate. These categories and VSLs were modified accordingly. In cases where there are issues with the requirement itself, we suggest that the commenter create a SAR to correct these issues through the Standards Development Process. 3) The VSL DT sympathizes with you in regards to the comment period. This was a lot of material to digest in a short period. Our hands were tied with a FERC deadline of March 1, 2008.</p>
SPP ORWG	<p>BAL-002-0; R3, R4, R5, and R6 seem to reward having excessive recordable events. If the RSG only has 3 events and fails one it falls into the category of a severe VSL. If we have 11 events and fail to meet 1 we fall into the lower VSL category. This seems to be at odds with the concept of reducing the number of recordable events in the first place.</p> <p>BAL-005-0; R1.1, R1.2, R1.3 - While recognizing the importance that all BES facilities to be included within the metered boundaries of a Balancing Authority Area, we feel that when one considers the impact of such a requirement on the reliability of the interconnection maintaining only a Severe VSL may be over restrictive, especially in situations where those facilities not included are at best minimal. Therefore we propose the SDT consider the language we have provided.</p> <p>CIP-001-1; R3 should be in the Procedure category rather than Coordination/Communicate.</p> <p>COM VSLs consistently use generic, vague language. This comment applies not only to the COM standards but applies to most all of the standards. For example, the use of significant, minor, major, etc. are too subjective and will be difficult to quantify during an audit.</p> <p>EOP-001-1; R5 Adherence to Attachment 1 is stipulated for applicable elements in the requirement but the attachment indicates that the elements are offered for consideration in development of emergency plans. Using a percentile quantification may not accurately represent the proper response by the responding entity.</p> <p>EOP-002-2; R9 is listed in the Implementation/Execution category. It should be in the Multi-component category with</p>

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Commenter	Comment
	<p>no VSLs since it does not require any action by any entity. The requirements are in the sub-elements R9.1 - R9.4. EOP-004-1; R2 is at best a poorly written requirement and attempting to apply a meaningful VSL to it makes the situation worse. It is difficult to quantify 'promptly'. The VSLs make reference to multiple elements for this requirement but it doesn't actually fit since the requirement calls for prompt action. It would appear that the only issue is promptly responding and if that isn't done the entity is non-compliant.</p> <p>FAC-001-0; R1 should be in the Multi-component category rather than Implementation/Execution.</p> <p>FAC-001-0; R1.1, R1.2 and R1.3 should be in the Procedure category rather than Implementation/Execution based on the wording in the requirement, '...document, maintain, and publish...'. FAC-001-0; R2.1.3 and 2.1.4 should be in the Procedure category rather than Implementation/Execution based on the wording in the requirement, 'Provide a written summary...'. FAC-001-0; R3 should be in the Procedure category rather than Implementation/Execution based on the wording in the requirement, "... maintain and update ... requirements..." FAC-002-0; R1 is listed in the Procedure category. It should be Coordinate/communicate based on the wording in the requirement, "... coordinate and cooperate..." FAC-003-1; R1.2.1 is listed in the Implementation category. It should be Procedure based on the wording in the requirement, "...determine and document..." FAC-003-1; R1.4 is listed in the Implementation category. It should be Procedure based on the wording in the requirement, "... develop mitigation measures ..." FAC-008-1; R1 is listed in the Multi-component category, but the VSLs are worded as a Procedure. It should be Procedure based on the wording in the requirement, "... document its current methodology..." INT-004-1, R1; INT-006-1, R1.2 and INT-007-1, R1.4 - The Lower, Moderate and High VSLs for these requirements are too vague and inconsistent. For example, what is the difference between 'minor exception and is substantially compliant' in the Lower VSL and 'some exception and is mostly compliant' in the Moderate VSL? IRO-001-1, R1 – The given VSLs are modeled under the Coordination/Communication category. They should be modeled under the Implementation/Execution category. If the RRO has an RC, they are compliant. If they don't they are non-compliant. Lower, moderate and high VSL would be N/A. Severe VSL would be "The responsible entity does not have an RC for all areas within its regional boundaries." IRO-001-1, R3 – Similar to R1. Either the RC has the authority or not. It is not a coordination/communication issue. It is an implementation/execution issue. IRO-005-1, R1 – Is shown under the Multi-component category. This particular requirement does not need a VSL since compliance is really associated with each of the sub-requirements. We would suggest leaving it off. IRO-005-1, R12 – Is actually a two part requirement with the first part being Implementation/Execution and the second part being Coordination/Communication. The VSLs for the first part needs to be added. IRO-005-1, R14 – Like R12 this requirement is consists of two parts. The first part is Coordination/Communication. The second part, which needs to be added, is Implementation/Execution. IRO-005-1, R15 – Is a three part requirement with the components of Coordination/Communication needing to be added. IRO-014-1, R1.1 – Another Multi-component category. We would suggest having no VSL for this requirement since it doesn't stand alone. See comment on IRO-005-1, R1.</p>

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Commenter	Comment
	<p>IRO-014-1, R2 – Same comment as for IRO-005-1, R1 and IRO-014-1, R1.1.</p> <p>IRO-014-1, R3 – Same comment as for IRO-005-1, R1, IRO-014-R1.1, and IRO-014-1, R2.</p> <p>IRO-014-1, R4 – Same comment as for IRO-005-1, R1, IRO-014-R1.1, IRO-014-1, R2 and IRO-014-1, R3.</p> <p>PER VSL changes, in general, are submitted in an attempt to provide more specific language.</p> <p>PER-003-0, R1 and PER-004-0, R1 - Proposed changes reflect the current Levels of Non-Compliance associated with these Requirement which are more applicable than those in the draft VSLs.</p> <p>TOP VSL changes are likewise submitted to eliminate vague, generic language.</p> <p>TOP-001-1, R7 and R7.1-R7.3 - R7 should be listed in the Multi-component category with the VSLs as suggested above. The VSLs for the sub-elements should be removed to eliminate double jeopardy for non-compliance.</p> <p>TOP-002-2, R14 should be rewritten to reflect the deletion of R14.2. R14.1 should be incorporated in R14 and the VSL we have provided used.</p> <p>TOP-002-2, R16 should be listed in the Multi-component category with the suggested VSLs we have provided and the VSLs deleted for R16.1 and R16.2.</p> <p>TOP-004-1, R6 should be listed in the Multi-component category with the suggested VSLs we have provided and the VSLs deleted for R6.1-R6.6.</p> <p>TOP-006-1; R1, R1.1 and R1.2 are so poorly written that it is almost impossible to fit the generic VSLs to them. The requirements should be rewritten and new VSLs developed for them. The Multi-component category should not be used for R1 unless the risk of double jeopardy is eliminated.</p> <p>VAR-001-1, R1 - We removed the last sentence of the Lower VSL because it did not add anything to the VSL.</p> <p>VAR-001-1, R2 - We suggest eliminating the percentage compliance VSLs and apply a go/no-go criteria for the High and Severe VSLs.</p> <p>VAR VSLs for VAR-001-1; R2, R5 and R9 will require extensive, complex studies of reactive resources and needs. Who will conduct these studies and how will they be conducted?</p> <p>VAR-001-1; R3 is listed in the Multi-component category and the VSL should reside there rather than in the sub-elements R3.1 and R3.2.</p> <p>VAR-001-1; R7 and R8 are all or none requirements. As such the only VSL should be Severe and appear as proposed by the SDT.</p> <p>VAR-001-1; R9 should be listed as Multi-component with the VSLs remaining as proposed by the SDT. The VSLs for the sub-element R9.1 should be removed to eliminate double jeopardy since the requirement is really taken care of in R9.</p> <p>VAR-001-1, R10 falls into the same trap as BAL-002-0; R2, R4, R5 and R6 in that using percentages could encourage poor performance. We suggest using absolute numbers.</p> <p>VAR-001-1; R11 is listed in the Reporting category, but should be Coordinate/communicate based on the wording in the VSL.</p> <p>VAR-002-1; R2 is listed in the Multi-component category, but should be shown in Implementation/Execution.</p> <p>VAR-002-1; R4.1 should be changed to the Explanatory Text category and since sub-elements R4.1.1-R4.1.4 are simply a bulleted list of sub-sub-elements, they should not have an associated VSL.</p> <p>VAR-002-1 R5 is listed in the Reporting category, but should be listed in Implementation/Execution based on the</p>

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Commenter	Comment
	wording in the VSLs as shown.
	<p>Response: The VSL DT thanks you for your comment. The VSL DT reviewed the categories for the requirements in the matrix for consistency and modified those that did not match the guideline. Each requirement that has a VRF assigned must also have a VSL assigned to it per the FERC Order. Issues identified with specific requirements should be addressed through the Standards Development Process. The commenter should develop a SAR to initiate this process.</p>
Uninet	Thanks for all your work.
	<p>Response: The VSL DT thanks you for your comment.</p>
WECC OTS	The OTS is unclear on what constitutes a minor detail or significant elements and requests clarification from the drafting team.
	<p>Response: The VSL DT thanks you for your comment. It is envisioned that guidelines will be used by Standards Drafting Teams to develop specific VSLs for each requirement going forward. They will employ their technical expertise to determine "minor" and "significant" details.</p>
WECC PWG	The severity levels for several requirements for BAL-001 through BAL-006 were subjective and too vague to apply. Using the same language in the Criteria tables from the VSL Development Guidelines Criteria for the Severity Levels is not an accurate method for measuring compliance
	<p>Response: The VSL DT thanks you for your comment. The VSL DT collaborated with existing Standards Drafting Teams to develop specific VSLs. Where a response from the SDT was received, their proposed VSL was used.</p>
WECC RCCWG	No comment.
Exelon	No comment.
BCTC	No comment.
Ameren (2)	No comment.
ATC	No comment.
NCMPA	No comment.
MISO	No comment.
SMUD	No comment.
WAPA	No comment.
WECC LRS	No comment.
NU	No comment.