

**Comment Form for First Draft of SAR for Violation Severity Levels
 (Project 2007-23)**

Please use this form to submit comments on the SAR for Violation Severity Levels. Comments must be submitted by **August 15, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "VSL SAR" in the subject line. If you have questions please contact Al Calafiore at al.calafiore@nerc.net (678-524-1188) or Stephen Crutchfield at stephen.crutchfield@nerc.net (609-651-9455).

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Steve Myers	
Organization:	ERCOT	
Telephone:	512-248-3077	
E-mail:	smyers@ercot.com	
NERC Region (Check all that apply)		Registered Ballot Body Segment (Check all that apply)
<input checked="" type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input checked="" type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

Background Information

The FERC, in the Order on Compliance Filing dated June 7, 2007 (Docket #RR06-1-007), directed NERC to replace the 'Levels of Non-compliance' (in the 83 standards it approved) with 'Violation Severity Levels' or VSLs by March 1, 2008.

NERC, as the ERO, is required to comply with FERC directives. By replacing the existing 'Levels of Non-compliance' with 'VSLs' the ERO's [Sanctions Guidelines](#) can be used as designed. The Sanctions Guidelines use VSLs as an element in determining the size of a sanction. The Sanctions Guidelines do not use 'Levels of Non-compliance.'

- Levels of Non-compliance assessed the reliability-related impact of violating a requirement — and in the ERO's Sanctions Guidelines, the reliability-related risk of violating a requirement is addressed with 'Violation Risk Factors'.
- Violation Severity Levels assess how badly a requirement was violated and do not look at the 'importance' of the requirement.

The draft SAR proposes replacing Levels of Non-compliance with VSLs by asking existing SAR and standard drafting teams to develop VSLs for standards within the scope of their projects and to form a small drafting team of subject matter experts and compliance personnel to address those standards not already under review by an existing drafting team. The proposed VSLs would be posted for comment, revised based on stakeholder feedback, and then balloted with their associated standards. The ballot would only be asking for approval of the VSLs.

Because many stakeholders have asked for input into the criteria used to establish VSLs, the SAR also proposes obtaining stakeholder consensus on the criteria used for assignment of VSLs. Since December 2006, standard drafting teams have been using the following guidelines for proposing VSLs. These guidelines were developed by NERC staff in support of the Sanctions Guidelines and have been included in most of the SARs approved in 2007:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Please review the SAR and then answer the questions on the following page. Send this form to sarcomm@nerc.net with the subject "VSL SAR" by **August 15, 2007**.

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed approach to meeting the FERC directive to replace 'Levels of Non-compliance' with 'Violation Severity Levels'? If not, please explain in the comment area.

Yes

No

Comments: ERCOT supports NERC's attempt to clarify these issues, but we do not need to put the cart before the horse. The criteria to be used should be developed and approved first, not together with--or worse, after--the VSLs are developed. Establishing the criteria at the outset will make the compliance program more consistent and rational.

2. Drafting Teams currently use the following criteria as a guideline in proposing violation severity levels:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

- Do you agree with the criteria currently used to distinguish Violation Severity Levels? If not, please explain in the comment area.

Yes

No

Comments: On the surface, these criteria seem reasonable. However, some cases are not covered, such as when a requirement presents a clear yes-or-no (binary) situation. Even more importantly--and this is an issue that exists for Violation Risk Factors as well--there needs to be a stronger differentiation between "importance" and "severity". This concept must be clarified in order to keep all violations and sanctions from migrating to the most onerous sanctions. A requirement may be very important, but that does not necessarily mean that a violation of that requirement clearly has a severe Violation Risk Factor, nor a severe Violation Severity Level. Almost no standard requirement, taken alone, should present a severe risk factor nor a severe VSL. In many instances, extensive post-occurrence analysis must be conducted before the proper context may be applied. There may be a few rare exceptions, such as blatant refusal by an entity to consider a requirement, or obvious repetitive behavior in violation of requirements, but

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

criteria should be in place to weigh such factors, rather than simply defaulting to higher levels of severity.

- 3. If you have any other comments on this SAR that you have not already provided above, please provide them here.**

Comments:

**Comment Form for First Draft of SAR for Violation Severity Levels
 (Project 2007-23)**

Please use this form to submit comments on the SAR for Violation Severity Levels. Comments must be submitted by **August 15, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "VSL SAR" in the subject line. If you have questions please contact Al Calafiore at al.calafiore@nerc.net (678-524-1188) or Stephen Crutchfield at stephen.crutchfield@nerc.net (609-651-9455).

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Rick White	
Organization:	Northeast Utilities	
Telephone:	860-665-2572	
E-mail:	whitefb@nu.com	
NERC Region (Check all that apply)		Registered Ballot Body Segment (Check all that apply)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

Background Information

The FERC, in the Order on Compliance Filing dated June 7, 2007 (Docket #RR06-1-007), directed NERC to replace the 'Levels of Non-compliance' (in the 83 standards it approved) with 'Violation Severity Levels' or VSLs by March 1, 2008.

NERC, as the ERO, is required to comply with FERC directives. By replacing the existing 'Levels of Non-compliance' with 'VSLs' the ERO's [Sanctions Guidelines](#) can be used as designed. The Sanctions Guidelines use VSLs as an element in determining the size of a sanction. The Sanctions Guidelines do not use 'Levels of Non-compliance.'

- Levels of Non-compliance assessed the reliability-related impact of violating a requirement — and in the ERO's Sanctions Guidelines, the reliability-related risk of violating a requirement is addressed with 'Violation Risk Factors'.
- Violation Severity Levels assess how badly a requirement was violated and do not look at the 'importance' of the requirement.

The draft SAR proposes replacing Levels of Non-compliance with VSLs by asking existing SAR and standard drafting teams to develop VSLs for standards within the scope of their projects and to form a small drafting team of subject matter experts and compliance personnel to address those standards not already under review by an existing drafting team. The proposed VSLs would be posted for comment, revised based on stakeholder feedback, and then balloted with their associated standards. The ballot would only be asking for approval of the VSLs.

Because many stakeholders have asked for input into the criteria used to establish VSLs, the SAR also proposes obtaining stakeholder consensus on the criteria used for assignment of VSLs. Since December 2006, standard drafting teams have been using the following guidelines for proposing VSLs. These guidelines were developed by NERC staff in support of the Sanctions Guidelines and have been included in most of the SARs approved in 2007:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Please review the SAR and then answer the questions on the following page. Send this form to sarcomm@nerc.net with the subject "VSL SAR" by **August 15, 2007**.

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed approach to meeting the FERC directive to replace 'Levels of Non-compliance' with 'Violation Severity Levels'? If not, please explain in the comment area.

Yes

No

Comments:

2. Drafting Teams currently use the following criteria as a guideline in proposing violation severity levels:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Do you agree with the criteria currently used to distinguish Violation Severity Levels? If not, please explain in the comment area.

Yes

No

Comments: 1) Can objective measurements for the numeric severity ranges be developed? It would seem very difficult to do this.

2) Is 70% a reasonable ceiling for a Severe VSL or should it be lower? A change here would cascade to changes in all categories. How were the numeric parameters developed?

3) How are "minor details" in the Lower category and "significant elements" in the Moderate and High categories defined?

3. If you have any other comments on this SAR that you have not already provided above, please provide them here.

Comments: How will the VSLs for individual violations be combined to create an aggregate penalty which is permitted under NERC sanctions guidelines?

**Comment Form for First Draft of SAR for Violation Severity Levels
 (Project 2007-23)**

Please use this form to submit comments on the SAR for Violation Severity Levels. Comments must be submitted by **August 15, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "VSL SAR" in the subject line. If you have questions please contact Al Calafiore at al.calafiore@nerc.net (678-524-1188) or Stephen Crutchfield at stephen.crutchfield@nerc.net (609-651-9455).

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Stan Southers / Ellis Rankin	
Organization:	Oncor Electric Delivery	
Telephone:	214-486-2084 / 214-743-6825	
E-mail:	stan.southers@oncor.com / erankin@oncor.com	
NERC Region (Check all that apply)	<input type="checkbox"/>	Registered Ballot Body Segment (Check all that apply)
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

Background Information

The FERC, in the Order on Compliance Filing dated June 7, 2007 (Docket #RR06-1-007), directed NERC to replace the 'Levels of Non-compliance' (in the 83 standards it approved) with 'Violation Severity Levels' or VSLs by March 1, 2008.

NERC, as the ERO, is required to comply with FERC directives. By replacing the existing 'Levels of Non-compliance' with 'VSLs' the ERO's [Sanctions Guidelines](#) can be used as designed. The Sanctions Guidelines use VSLs as an element in determining the size of a sanction. The Sanctions Guidelines do not use 'Levels of Non-compliance.'

- Levels of Non-compliance assessed the reliability-related impact of violating a requirement — and in the ERO's Sanctions Guidelines, the reliability-related risk of violating a requirement is addressed with 'Violation Risk Factors'.
- Violation Severity Levels assess how badly a requirement was violated and do not look at the 'importance' of the requirement.

The draft SAR proposes replacing Levels of Non-compliance with VSLs by asking existing SAR and standard drafting teams to develop VSLs for standards within the scope of their projects and to form a small drafting team of subject matter experts and compliance personnel to address those standards not already under review by an existing drafting team. The proposed VSLs would be posted for comment, revised based on stakeholder feedback, and then balloted with their associated standards. The ballot would only be asking for approval of the VSLs.

Because many stakeholders have asked for input into the criteria used to establish VSLs, the SAR also proposes obtaining stakeholder consensus on the criteria used for assignment of VSLs. Since December 2006, standard drafting teams have been using the following guidelines for proposing VSLs. These guidelines were developed by NERC staff in support of the Sanctions Guidelines and have been included in most of the SARs approved in 2007:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Please review the SAR and then answer the questions on the following page. Send this form to sarcomm@nerc.net with the subject "VSL SAR" by **August 15, 2007**.

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed approach to meeting the FERC directive to replace 'Levels of Non-compliance' with 'Violation Severity Levels'? If not, please explain in the comment area.

Yes

No

Comments:

2. Drafting Teams currently use the following criteria as a guideline in proposing violation severity levels:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Do you agree with the criteria currently used to distinguish Violation Severity Levels? If not, please explain in the comment area.

Yes

No

Comments:

3. If you have any other comments on this SAR that you have not already provided above, please provide them here.

Comments:

**Comment Form for First Draft of SAR for Violation Severity Levels
 (Project 2007-23)**

Please use this form to submit comments on the SAR for Violation Severity Levels. Comments must be submitted by **August 15, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "VSL SAR" in the subject line. If you have questions please contact Al Calafiore at al.calafiore@nerc.net (678-524-1188) or Stephen Crutchfield at stephen.crutchfield@nerc.net (609-651-9455).

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	William Franklin	
Organization:	Entergy Services, Inc. System Planning and Operations (Generation)	
Telephone:	281-297-3594	
E-mail:	wfrankl@entergy.com	
NERC Region (Check all that apply)	Registered Ballot Body Segment (Check all that apply)	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

Background Information

The FERC, in the Order on Compliance Filing dated June 7, 2007 (Docket #RR06-1-007), directed NERC to replace the 'Levels of Non-compliance' (in the 83 standards it approved) with 'Violation Severity Levels' or VSLs by March 1, 2008.

NERC, as the ERO, is required to comply with FERC directives. By replacing the existing 'Levels of Non-compliance' with 'VSLs' the ERO's [Sanctions Guidelines](#) can be used as designed. The Sanctions Guidelines use VSLs as an element in determining the size of a sanction. The Sanctions Guidelines do not use 'Levels of Non-compliance.'

- Levels of Non-compliance assessed the reliability-related impact of violating a requirement — and in the ERO's Sanctions Guidelines, the reliability-related risk of violating a requirement is addressed with 'Violation Risk Factors'.
- Violation Severity Levels assess how badly a requirement was violated and do not look at the 'importance' of the requirement.

The draft SAR proposes replacing Levels of Non-compliance with VSLs by asking existing SAR and standard drafting teams to develop VSLs for standards within the scope of their projects and to form a small drafting team of subject matter experts and compliance personnel to address those standards not already under review by an existing drafting team. The proposed VSLs would be posted for comment, revised based on stakeholder feedback, and then balloted with their associated standards. The ballot would only be asking for approval of the VSLs.

Because many stakeholders have asked for input into the criteria used to establish VSLs, the SAR also proposes obtaining stakeholder consensus on the criteria used for assignment of VSLs. Since December 2006, standard drafting teams have been using the following guidelines for proposing VSLs. These guidelines were developed by NERC staff in support of the Sanctions Guidelines and have been included in most of the SARs approved in 2007:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Please review the SAR and then answer the questions on the following page. Send this form to sarcomm@nerc.net with the subject "VSL SAR" by **August 15, 2007**.

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed approach to meeting the FERC directive to replace 'Levels of Non-compliance' with 'Violation Severity Levels'? If not, please explain in the comment area.

Yes

No

Comments:

2. Drafting Teams currently use the following criteria as a guideline in proposing violation severity levels:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Do you agree with the criteria currently used to distinguish Violation Severity Levels? If not, please explain in the comment area.

Yes

No

Comments: While this is the current criteria being used developing VSLs in other SARs, the VSLs are not defined for each specific level in the Reliability Standards Development Procedure. The term "mostly" is subjective and should be removed or replaced with a more definitive term. Similarly, there needs to be a defined distinction between "significant elements" and "minor details". The methodology/description for determination of meeting the requirement's reliability objective needs to be very clear in the Measures if this will be used as a basis for assigning VSLs.

3. If you have any other comments on this SAR that you have not already provided above, please provide them here.

Comments:

With respect to developing VSLs for standards with no specific drafting team, any revised standard for the purpose of adding VSLs should be balloted separately (not in a grouping with other standards) so that the entire set is not rejected because of an issue with one of the standards, nor approved as a set with flaws/concerns in one or more of the standards.

**Comment Form for First Draft of SAR for Violation Severity Levels
 (Project 2007-23)**

Please use this form to submit comments on the SAR for Violation Severity Levels. Comments must be submitted by **August 15, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "VSL SAR" in the subject line. If you have questions please contact Al Calafiore at al.calafiore@nerc.net (678-524-1188) or Stephen Crutchfield at stephen.crutchfield@nerc.net (609-651-9455).

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Thad K. Ness	
Organization:	American Electric Power (AEP)	
Telephone:	614-716-253	
E-mail:	tkness@aep.com	
NERC Region (Check all that apply)	Registered Ballot Body Segment (Check all that apply)	
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

Background Information

The FERC, in the Order on Compliance Filing dated June 7, 2007 (Docket #RR06-1-007), directed NERC to replace the 'Levels of Non-compliance' (in the 83 standards it approved) with 'Violation Severity Levels' or VSLs by March 1, 2008.

NERC, as the ERO, is required to comply with FERC directives. By replacing the existing 'Levels of Non-compliance' with 'VSLs' the ERO's [Sanctions Guidelines](#) can be used as designed. The Sanctions Guidelines use VSLs as an element in determining the size of a sanction. The Sanctions Guidelines do not use 'Levels of Non-compliance.'

- Levels of Non-compliance assessed the reliability-related impact of violating a requirement — and in the ERO's Sanctions Guidelines, the reliability-related risk of violating a requirement is addressed with 'Violation Risk Factors'.
- Violation Severity Levels assess how badly a requirement was violated and do not look at the 'importance' of the requirement.

The draft SAR proposes replacing Levels of Non-compliance with VSLs by asking existing SAR and standard drafting teams to develop VSLs for standards within the scope of their projects and to form a small drafting team of subject matter experts and compliance personnel to address those standards not already under review by an existing drafting team. The proposed VSLs would be posted for comment, revised based on stakeholder feedback, and then balloted with their associated standards. The ballot would only be asking for approval of the VSLs.

Because many stakeholders have asked for input into the criteria used to establish VSLs, the SAR also proposes obtaining stakeholder consensus on the criteria used for assignment of VSLs. Since December 2006, standard drafting teams have been using the following guidelines for proposing VSLs. These guidelines were developed by NERC staff in support of the Sanctions Guidelines and have been included in most of the SARs approved in 2007:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Please review the SAR and then answer the questions on the following page. Send this form to sarcomm@nerc.net with the subject "VSL SAR" by **August 15, 2007**.

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed approach to meeting the FERC directive to replace 'Levels of Non-compliance' with 'Violation Severity Levels'? If not, please explain in the comment area.

Yes

No

Comments:

2. Drafting Teams currently use the following criteria as a guideline in proposing violation severity levels:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Do you agree with the criteria currently used to distinguish Violation Severity Levels? If not, please explain in the comment area.

Yes

No

Comments: Where do percentages come into play and how will they be determined?

3. If you have any other comments on this SAR that you have not already provided above, please provide them here.

Comments:



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

Please use this form to submit comments on the SAR for Violation Severity Levels. Comments must be submitted by **August 15, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "VSL SAR" in the subject line. If you have questions please contact Al Calafiore at al.calafiore@nerc.net (678-524-1188) or Stephen Crutchfield at stephen.crutchfield@nerc.net (609-651-9455).

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Kirit Shah	
Organization:	Ameren	
Telephone:	314-554-3542	
E-mail:	kshah@ameren.com	
NERC Region (Check all that apply)	Registered Ballot Body Segment (Check all that apply)	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

Background Information

The FERC, in the Order on Compliance Filing dated June 7, 2007 (Docket #RR06-1-007), directed NERC to replace the 'Levels of Non-compliance' (in the 83 standards it approved) with 'Violation Severity Levels' or VSLs by March 1, 2008.

NERC, as the ERO, is required to comply with FERC directives. By replacing the existing 'Levels of Non-compliance' with 'VSLs' the ERO's [Sanctions Guidelines](#) can be used as designed. The Sanctions Guidelines use VSLs as an element in determining the size of a sanction. The Sanctions Guidelines do not use 'Levels of Non-compliance.'

- Levels of Non-compliance assessed the reliability-related impact of violating a requirement — and in the ERO's Sanctions Guidelines, the reliability-related risk of violating a requirement is addressed with 'Violation Risk Factors'.
- Violation Severity Levels assess how badly a requirement was violated and do not look at the 'importance' of the requirement.

The draft SAR proposes replacing Levels of Non-compliance with VSLs by asking existing SAR and standard drafting teams to develop VSLs for standards within the scope of their projects and to form a small drafting team of subject matter experts and compliance personnel to address those standards not already under review by an existing drafting team. The proposed VSLs would be posted for comment, revised based on stakeholder feedback, and then balloted with their associated standards. The ballot would only be asking for approval of the VSLs.

Because many stakeholders have asked for input into the criteria used to establish VSLs, the SAR also proposes obtaining stakeholder consensus on the criteria used for assignment of VSLs. Since December 2006, standard drafting teams have been using the following guidelines for proposing VSLs. These guidelines were developed by NERC staff in support of the Sanctions Guidelines and have been included in most of the SARs approved in 2007:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Please review the SAR and then answer the questions on the following page. Send this form to sarcomm@nerc.net with the subject "VSL SAR" by **August 15, 2007**.

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. **Do you agree with the proposed approach to meeting the FERC directive to replace 'Levels of Non-compliance' with 'Violation Severity Levels'? If not, please explain in the comment area.**

Yes

No

Comments: First the proposed guidelines for the VSL by itself should go through the industry approval process as they would significantly impact the sanctions; however, as they are defined now appear arbitrary and require substantial clarification.

We also do not agree with the proposed approach to have just one drafting team processing several standards encompassing different technical areas. We believe that each technical area may need its own expertise (drafting team) to properly assign the VSLs.

Further, it is not clear from the proposed approach whether each standard would be balloted separately for the assigned VSL or several standards would be voted collectively in one ballot.

2. **Drafting Teams currently use the following criteria as a guideline in proposing violation severity levels:**

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Do you agree with the criteria currently used to distinguish Violation Severity Levels? If not, please explain in the comment area.

Yes

No

Comments: We believe that the above definitions are a good starting point, but additional clarification needs to be provided regarding how the "Equivalent Score" would be determined, as each standard does not have the same number of requirements and sub-requirements. Also, in most of the standards, the requirements and sub-requirements have only a binary ("yes" or "no") provision for compliance, and do not require a quantitative or qualitative response on which to base any scoring.

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

Further, we believe that the ranges for the violation severity levels for "Lower", "Moderate", and "High" need to be modified such that each level has a 10-point range for proper stratification of the compliance scores within these levels, as noted below:

The range of the "Lower" violation severity levels needs to be opened up such that the equivalent score would fall within the range of 90-99% of full compliance. We believe that the proposed 5-point 95-99% range is too narrow a bandwidth for the "Lower" violation severity level. It is suggested that the term "Lower" be change to "Low" to better match the descriptions of the other severity levels.

The upper bound, lower bound, and range for the "Moderate" violation severity level all need to be lowered from the proposed 11-point 85-95% range to a 10-point 80-89% range. We believe that the proposed 85-95% range is too high for this violation severity level.

The range of the "High" violation severity levels needs to be closed down such that the equivalent score would fall within the range of 70-79% of full compliance. We believe that the proposed 16-point 70-85% range is too broad and the upper bound is too high for this violation severity level.

Those with "Severe" violation severity levels should have an equivalent score less than 70%, and not 70% or less.

"Mostly" and "partially" are ill defined and offer no reasonable measurement from standard to standard in assessing performance.

3. If you have any other comments on this SAR that you have not already provided above, please provide them here.

Comments: With the number and diversity of the NERC Standards that require development of violation severity levels, we question whether a single drafting team can exist that would contain the required expertise in all of the standards areas to be able to develop the proper violation severity levels for each standard. It is therefore suggested that several drafting teams be developed to address the list of standards within the various Standards Categories.

**Comment Form for First Draft of SAR for Violation Severity Levels
 (Project 2007-23)**

Please use this form to submit comments on the SAR for Violation Severity Levels. Comments must be submitted by **August 15, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "VSL SAR" in the subject line. If you have questions please contact Al Calafiore at al.calafiore@nerc.net (678-524-1188) or Stephen Crutchfield at stephen.crutchfield@nerc.net (609-651-9455).

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region (Check all that apply)	Registered Ballot Body Segment (Check all that apply)	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

Background Information

The FERC, in the Order on Compliance Filing dated June 7, 2007 (Docket #RR06-1-007), directed NERC to replace the 'Levels of Non-compliance' (in the 83 standards it approved) with 'Violation Severity Levels' or VSLs by March 1, 2008.

NERC, as the ERO, is required to comply with FERC directives. By replacing the existing 'Levels of Non-compliance' with 'VSLs' the ERO's [Sanctions Guidelines](#) can be used as designed. The Sanctions Guidelines use VSLs as an element in determining the size of a sanction. The Sanctions Guidelines do not use 'Levels of Non-compliance.'

- Levels of Non-compliance assessed the reliability-related impact of violating a requirement — and in the ERO's Sanctions Guidelines, the reliability-related risk of violating a requirement is addressed with 'Violation Risk Factors'.
- Violation Severity Levels assess how badly a requirement was violated and do not look at the 'importance' of the requirement.

The draft SAR proposes replacing Levels of Non-compliance with VSLs by asking existing SAR and standard drafting teams to develop VSLs for standards within the scope of their projects and to form a small drafting team of subject matter experts and compliance personnel to address those standards not already under review by an existing drafting team. The proposed VSLs would be posted for comment, revised based on stakeholder feedback, and then balloted with their associated standards. The ballot would only be asking for approval of the VSLs.

Because many stakeholders have asked for input into the criteria used to establish VSLs, the SAR also proposes obtaining stakeholder consensus on the criteria used for assignment of VSLs. Since December 2006, standard drafting teams have been using the following guidelines for proposing VSLs. These guidelines were developed by NERC staff in support of the Sanctions Guidelines and have been included in most of the SARs approved in 2007:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Please review the SAR and then answer the questions on the following page. Send this form to sarcomm@nerc.net with the subject "VSL SAR" by **August 15, 2007**.

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed approach to meeting the FERC directive to replace 'Levels of Non-compliance' with 'Violation Severity Levels'? If not, please explain in the comment area.

Yes

No

Comments: We agree with the general direction to replace non-compliance levels with violation severity levels. However, we feel that there lacks a common understanding and agreement across the industry on the definition and assignment of the 4 levels of violation despite the guideline provided in the SAR.

The guideline is quite broad in its definition and has never been vetted through established standard development process, and there has been no open discussion on the appropriateness of these levels based solely on the compliant percentage. We see the need to first establish a set of definition and guideline that is definitive and fully vetted by the industry.

For standards that are currently being worked on by established drafting teams, it would be prudent and more effective to defer developing the violation severity levels pending completion of the above suggested process.

2. Drafting Teams currently use the following criteria as a guideline in proposing violation severity levels:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Do you agree with the criteria currently used to distinguish Violation Severity Levels? If not, please explain in the comment area.

Yes

No

Comments: The above guideline is applicable to a certain type of requirements only - requirements that can be assessed on a percentage basis. There are those requirements whose compliance is determined from a simple "yes" or "no", for examples, "shall have a

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

backup control centre", and "shall take action to correct IROL violation within Tv". These requirements cannot be measured on a percentage basis.

There are also those requirements for which the violation level should go up as the number of violations increases. The draft IRO-006-4 standard that is currently posted for pre-ballot review provides an example of assigning violation severity level according to the number of times requirements are not met. In other words, repeat offenders are assigned higher violation level than their occasional counterparts.

On the basis of the above-mentioned examples, we strongly recommend that the guideline(s) be expanded to cover situations where percentage measurement is not applicable or appropriate. As such, we recommend that the SAR be modified to first develop a full set of VSL guidelines for industry review, comment and balloting, and then use the approved guidelines to develop violation severity levels for the standards.

We believe a guideline that is fully vetted and supported by the majority of the industry participants and has the necessary elements to cover different type of standard requirements, would lend itself to a much more efficient task in developing the violation severity levels.

In view of the March 2008 target date to comply with the FERC directive, we feel there is sufficient time to complete both tasks.

3. If you have any other comments on this SAR that you have not already provided above, please provide them here.

Comments: The SAR mentions that 83 standard were approved by FERC - this would have to be revised and all standards subsequently approved since FERC Rule 693 should be incorporated into this SAR and corresponding SDTs be identified accordingly.

**Comment Form for First Draft of SAR for Violation Severity Levels
 (Project 2007-23)**

Please use this form to submit comments on the SAR for Violation Severity Levels. Comments must be submitted by **August 15, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "VSL SAR" in the subject line. If you have questions please contact Al Calafiore at al.calafiore@nerc.net (678-524-1188) or Stephen Crutchfield at stephen.crutchfield@nerc.net (609-651-9455).

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (Check all that apply)		Registered Ballot Body Segment (Check all that apply)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

Background Information

The FERC, in the Order on Compliance Filing dated June 7, 2007 (Docket #RR06-1-007), directed NERC to replace the 'Levels of Non-compliance' (in the 83 standards it approved) with 'Violation Severity Levels' or VSLs by March 1, 2008.

NERC, as the ERO, is required to comply with FERC directives. By replacing the existing 'Levels of Non-compliance' with 'VSLs' the ERO's [Sanctions Guidelines](#) can be used as designed. The Sanctions Guidelines use VSLs as an element in determining the size of a sanction. The Sanctions Guidelines do not use 'Levels of Non-compliance.'

- Levels of Non-compliance assessed the reliability-related impact of violating a requirement — and in the ERO's Sanctions Guidelines, the reliability-related risk of violating a requirement is addressed with 'Violation Risk Factors'.
- Violation Severity Levels assess how badly a requirement was violated and do not look at the 'importance' of the requirement.

The draft SAR proposes replacing Levels of Non-compliance with VSLs by asking existing SAR and standard drafting teams to develop VSLs for standards within the scope of their projects and to form a small drafting team of subject matter experts and compliance personnel to address those standards not already under review by an existing drafting team. The proposed VSLs would be posted for comment, revised based on stakeholder feedback, and then balloted with their associated standards. The ballot would only be asking for approval of the VSLs.

Because many stakeholders have asked for input into the criteria used to establish VSLs, the SAR also proposes obtaining stakeholder consensus on the criteria used for assignment of VSLs. Since December 2006, standard drafting teams have been using the following guidelines for proposing VSLs. These guidelines were developed by NERC staff in support of the Sanctions Guidelines and have been included in most of the SARs approved in 2007:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Please review the SAR and then answer the questions on the following page. Send this form to sarcomm@nerc.net with the subject "VSL SAR" by **August 15, 2007**.

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed approach to meeting the FERC directive to replace 'Levels of Non-compliance' with 'Violation Severity Levels'? If not, please explain in the comment area.

Yes

No

Comments: We agree with the general direction to replace non-compliance levels with violation severity levels. However, we feel that there lacks a common understanding and agreement across the industry on the definition and assignment of the 4 levels of violations despite the guideline provided in the SAR.

The guideline has never been vetted through established standard development process, and there has been no open discussion or justification given on the appropriateness of these levels. Thus, they often appear to be arbitrary. We see the need to first establish a set of definitions and guidelines that are fully vetted before assigning the levels to the standards.

For standards that are currently being worked on by established drafting teams, it would be prudent and more effective to defer developing the violation severity levels pending completion of the above suggested task.

2. Drafting Teams currently use the following criteria as a guideline in proposing violation severity levels:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Do you agree with the criteria currently used to distinguish Violation Severity Levels? If not, please explain in the comment area.

Yes

No

Comments: The above guideline assumes that all requirements in the standards can be lumped into one group based on the violation of the standard. We propose this is incorrect and there are, in fact, multiple groups of standards based on the type of violation. For some requirements, one can measure how badly the requirement was

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

violated. For example, the BAL-002-0 DCS standard has requirements that allow the measurement of how close the BA or RSG was to returning ACE to zero or the pre-disturbance level. These requirements represent one group.

Other requirements (attribute requirements) either have been met or they have not been met. For example, BAL-004-0 requires each BA to participate in a Time Error Correction when issued. Either the BA participated or they didn't. In the past, this guideline was "force fitted" to this type of requirement resulting in the most severe VSL being applied to these attribute requirements. We suggest that the guideline be expanded to cover these attribute requirements.

There are still other requirements for which the violation level should go up as the number of violations increases. The draft IRO-006-4 standard that is currently posted for pre-ballot review provides an example of assigning violation severity level according to the number of requirements within the standard that are not met. In other words, repeat offenders are assigned higher violation level than their occasional counterparts.

We suggest the SAR be modified to first develop a full set of VSL guidelines for industry review, comment and balloting. Then use the approved guidelines to develop violation severity levels for the 87 standards.

We believe a guideline that is fully vetted and supported by the majority of the industry participants, and has the necessary elements to cover different types of standards requirements, would lead to a much more efficient task in developing the violation severity levels. In view of the March 2008 target date to comply with the FERC directive, we feel there is sufficient time to complete both tasks.

Additionally, we believe the VSLs and VRFs confuse the importance of a requirement with the risk level and severity of the violation. VSLs should not be selected based on the importance of the requirement. All requirements should be considered important; otherwise, why are they requirements? An important requirement often does not translate into a high violation risk factor or a severe violation severity level. Unfortunately, there seems to be a trend to set most VRFs to higher levels and VSLs to more severe levels for the purpose of increasing the penalty associated with a compliance violation. Very few standards represent a high violation risk factor or a severe VSL per se. The blackout report even pointed out that it is usually the violation of many requirements that leads to blackouts. The ERO's ability to escalate penalties based on the number of violations should be sufficient incentive to avoid these situations and obviates the need to create large penalties by setting VRFs and VSLs artificially high. Additionally, extensive post-occurrence analysis often must be conducted before the proper severity level may be applied. There may be a few rare exceptions, such as blatant refusal by an entity to consider a requirement that requires severe penalties and the ERO's penalty algorithm allows this to be considered.

3. If you have any other comments on this SAR that you have not already provided above, please provide them here.

Comments:

**Comment Form for First Draft of SAR for Violation Severity Levels
 (Project 2007-23)**

Please use this form to submit comments on the SAR for Violation Severity Levels. Comments must be submitted by **August 15, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "VSL SAR" in the subject line. If you have questions please contact Al Calafiore at al.calafiore@nerc.net (678-524-1188) or Stephen Crutchfield at stephen.crutchfield@nerc.net (609-651-9455).

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Brian Thumm	
Organization:	ITC	
Telephone:	248-374-7846	
E-mail:	bthumm@itctransco.com	
NERC Region (Check all that apply)	Registered Ballot Body Segment (Check all that apply)	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

Background Information

The FERC, in the Order on Compliance Filing dated June 7, 2007 (Docket #RR06-1-007), directed NERC to replace the 'Levels of Non-compliance' (in the 83 standards it approved) with 'Violation Severity Levels' or VSLs by March 1, 2008.

NERC, as the ERO, is required to comply with FERC directives. By replacing the existing 'Levels of Non-compliance' with 'VSLs' the ERO's [Sanctions Guidelines](#) can be used as designed. The Sanctions Guidelines use VSLs as an element in determining the size of a sanction. The Sanctions Guidelines do not use 'Levels of Non-compliance.'

- Levels of Non-compliance assessed the reliability-related impact of violating a requirement — and in the ERO's Sanctions Guidelines, the reliability-related risk of violating a requirement is addressed with 'Violation Risk Factors'.
- Violation Severity Levels assess how badly a requirement was violated and do not look at the 'importance' of the requirement.

The draft SAR proposes replacing Levels of Non-compliance with VSLs by asking existing SAR and standard drafting teams to develop VSLs for standards within the scope of their projects and to form a small drafting team of subject matter experts and compliance personnel to address those standards not already under review by an existing drafting team. The proposed VSLs would be posted for comment, revised based on stakeholder feedback, and then balloted with their associated standards. The ballot would only be asking for approval of the VSLs.

Because many stakeholders have asked for input into the criteria used to establish VSLs, the SAR also proposes obtaining stakeholder consensus on the criteria used for assignment of VSLs. Since December 2006, standard drafting teams have been using the following guidelines for proposing VSLs. These guidelines were developed by NERC staff in support of the Sanctions Guidelines and have been included in most of the SARs approved in 2007:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Please review the SAR and then answer the questions on the following page. Send this form to sarcomm@nerc.net with the subject "VSL SAR" by **August 15, 2007**.

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. **Do you agree with the proposed approach to meeting the FERC directive to replace 'Levels of Non-compliance' with 'Violation Severity Levels'? If not, please explain in the comment area.**

Yes

No

Comments:

2. **Drafting Teams currently use the following criteria as a guideline in proposing violation severity levels:**

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Do you agree with the criteria currently used to distinguish Violation Severity Levels? If not, please explain in the comment area.

Yes

No

Comments: The "Equivalent Score," at times, is meaningless. Most standards do not lend themselves to a percentage score. Latitude should be given to omit the equivalent score from a severity level if it does not apply to a particular standard.

3. **If you have any other comments on this SAR that you have not already provided above, please provide them here.**

Comments:

**Comment Form for First Draft of SAR for Violation Severity Levels
 (Project 2007-23)**

Please use this form to submit comments on the SAR for Violation Severity Levels. Comments must be submitted by **August 15, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "VSL SAR" in the subject line. If you have questions please contact Al Calafiore at al.calafiore@nerc.net (678-524-1188) or Stephen Crutchfield at stephen.crutchfield@nerc.net (609-651-9455).

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Gammon	
Organization:	Kansas City Power & Light	
Telephone:	816-654-1242	
E-mail:	mike.gammon@kcpl.com	
NERC Region (Check all that apply)		Registered Ballot Body Segment (Check all that apply)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

Background Information

The FERC, in the Order on Compliance Filing dated June 7, 2007 (Docket #RR06-1-007), directed NERC to replace the 'Levels of Non-compliance' (in the 83 standards it approved) with 'Violation Severity Levels' or VSLs by March 1, 2008.

NERC, as the ERO, is required to comply with FERC directives. By replacing the existing 'Levels of Non-compliance' with 'VSLs' the ERO's [Sanctions Guidelines](#) can be used as designed. The Sanctions Guidelines use VSLs as an element in determining the size of a sanction. The Sanctions Guidelines do not use 'Levels of Non-compliance.'

- Levels of Non-compliance assessed the reliability-related impact of violating a requirement — and in the ERO's Sanctions Guidelines, the reliability-related risk of violating a requirement is addressed with 'Violation Risk Factors'.
- Violation Severity Levels assess how badly a requirement was violated and do not look at the 'importance' of the requirement.

The draft SAR proposes replacing Levels of Non-compliance with VSLs by asking existing SAR and standard drafting teams to develop VSLs for standards within the scope of their projects and to form a small drafting team of subject matter experts and compliance personnel to address those standards not already under review by an existing drafting team. The proposed VSLs would be posted for comment, revised based on stakeholder feedback, and then balloted with their associated standards. The ballot would only be asking for approval of the VSLs.

Because many stakeholders have asked for input into the criteria used to establish VSLs, the SAR also proposes obtaining stakeholder consensus on the criteria used for assignment of VSLs. Since December 2006, standard drafting teams have been using the following guidelines for proposing VSLs. These guidelines were developed by NERC staff in support of the Sanctions Guidelines and have been included in most of the SARs approved in 2007:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Please review the SAR and then answer the questions on the following page. Send this form to sarcomm@nerc.net with the subject "VSL SAR" by **August 15, 2007**.

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed approach to meeting the FERC directive to replace 'Levels of Non-compliance' with 'Violation Severity Levels'? If not, please explain in the comment area.

Yes

No

Comments:

2. Drafting Teams currently use the following criteria as a guideline in proposing violation severity levels:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Do you agree with the criteria currently used to distinguish Violation Severity Levels? If not, please explain in the comment area.

Yes

No

Comments:

3. If you have any other comments on this SAR that you have not already provided above, please provide them here.

Comments: Violation Severity Levels should only apply directly to reliability related requirements. Any requirements in the standards that can be deemed as administrative in nature or procedural should be exempt from the application of these Violation Severity Levels.

**Comment Form for First Draft of SAR for Violation Severity Levels
 (Project 2007-23)**

Please use this form to submit comments on the SAR for Violation Severity Levels. Comments must be submitted by **August 15, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "VSL SAR" in the subject line. If you have questions please contact Al Calafiore at al.calafiore@nerc.net (678-524-1188) or Stephen Crutchfield at stephen.crutchfield@nerc.net (609-651-9455).

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michelle Rheault	
Organization:	Manitoba Hydro	
Telephone:	204-487-5445	
E-mail:	mdrheault@hydro.mb.ca	
NERC Region (Check all that apply)	<input type="checkbox"/>	Registered Ballot Body Segment (Check all that apply)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

Background Information

The FERC, in the Order on Compliance Filing dated June 7, 2007 (Docket #RR06-1-007), directed NERC to replace the 'Levels of Non-compliance' (in the 83 standards it approved) with 'Violation Severity Levels' or VSLs by March 1, 2008.

NERC, as the ERO, is required to comply with FERC directives. By replacing the existing 'Levels of Non-compliance' with 'VSLs' the ERO's [Sanctions Guidelines](#) can be used as designed. The Sanctions Guidelines use VSLs as an element in determining the size of a sanction. The Sanctions Guidelines do not use 'Levels of Non-compliance.'

- Levels of Non-compliance assessed the reliability-related impact of violating a requirement — and in the ERO's Sanctions Guidelines, the reliability-related risk of violating a requirement is addressed with 'Violation Risk Factors'.
- Violation Severity Levels assess how badly a requirement was violated and do not look at the 'importance' of the requirement.

The draft SAR proposes replacing Levels of Non-compliance with VSLs by asking existing SAR and standard drafting teams to develop VSLs for standards within the scope of their projects and to form a small drafting team of subject matter experts and compliance personnel to address those standards not already under review by an existing drafting team. The proposed VSLs would be posted for comment, revised based on stakeholder feedback, and then balloted with their associated standards. The ballot would only be asking for approval of the VSLs.

Because many stakeholders have asked for input into the criteria used to establish VSLs, the SAR also proposes obtaining stakeholder consensus on the criteria used for assignment of VSLs. Since December 2006, standard drafting teams have been using the following guidelines for proposing VSLs. These guidelines were developed by NERC staff in support of the Sanctions Guidelines and have been included in most of the SARs approved in 2007:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Please review the SAR and then answer the questions on the following page. Send this form to sarcomm@nerc.net with the subject "VSL SAR" by **August 15, 2007**.

Comment Form for First Draft of SAR for Violation Severity Levels (Project 2007-23)

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the proposed approach to meeting the FERC directive to replace 'Levels of Non-compliance' with 'Violation Severity Levels'? If not, please explain in the comment area.

Yes

No

Comments: We do not agree to replace 'Levels of Non-compliance' with 'Violation Severity Levels' as defined by the existing criteria. The definitions of the VSL categories are vague and use language (like "minor" and "mostly compliant") make it difficult to distinguish between each severity level. These definitions can lead to and cause misinterpretation and misunderstanding when determining the severity of a violation.

Each standard is different in its requirements and measures. A "one size fits all" approach to determining the VSL's for each standard will not produce an acceptable assessment of the severity of a violation.

Although we agree with the approach that small teams of experts are needed to determine the VSL's for each standard, an oversight team is also needed to ensure that there is consistency between the smaller teams in their end result. This oversight group would also develop new guidelines for the development of VSL's that the smaller groups would apply to each standard.

2. Drafting Teams currently use the following criteria as a guideline in proposing violation severity levels:

Lower: mostly compliant with minor exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: more than 95% but less than 100% compliant.

Moderate: mostly compliant with significant exceptions — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: more than 85% but less than or equal to 95% compliant.

High: marginal performance or results — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: more than 70% but less than or equal to 85% compliant.

Severe: poor performance or results — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: 70% or less compliant.

Do you agree with the criteria currently used to distinguish Violation Severity Levels? If not, please explain in the comment area.

Yes

No

Comments: The criteria is very subjective as it is left to judgement as to what is a "minor exception" and what is "significant exception". There is no explanation as to how an equivalent score is calculated given the facts of any particular violation.

- 3. If you have any other comments on this SAR that you have not already provided above, please provide them here.**

Comments: