Version 0 Risk Factors — Emergency Operations

Summary Consideration: While several commenters made suggestions to change one or more of the ratings, there was no consensus to change any one of the ratings, therefore, no changes were made to the violation risk factors for this set of requirements.

Company	Segment	Balloter	Comments
ALCOA Yadkin/Tapoco Divisions	1	Marion Lucas	Although it is important to have an Emergency plan of action that is tested, reviewed and understood, we have to remember it is still only a plan or a document. The EOP requirements that are administrative in nature should be a lower rating. EOP-001-0 R1 should be ranked as medium. Per definition, violation of a medium risk requirement is unlikely to lead to bulk electric system instability. Lack of an operating agreement will not bring instability to the system as operators inherently work with each other and are trained to assist others in normal and/or emergency situations. EOP-007-0 R1 should be lower. A requirement to have a database is an administrative function.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the standards/requirements you reference to override the industry's VRF values.			
APPA	1	E. Nick Henery	Requesting the SDT to reduce the VRF to the lowest amounts on all requirements in standards that have not been approved as mandatory and enforceable in the NOPR without requiring modification. If these standards are not sufficient to be made mandatory and enforceable without requiring the standard to be submitted to the industry for modification, exposure to anything but the minimum penalty will result in excessive appeals and that will hurt the compliance program for those standards that are mandatory and enforceable without need for modification.
Response: The industry determined the VRFs for the standards/requirements by majority vote. Changes to Standards will be addressed by the NERC Reliability Standards Development Plan: 2007-2009 which will review and revise as necessary all reliability standards. Please refer to the posted work plan for details. Note that violation risk factors will only be applicable to standards that receive applicable regulatory approvals.			
Baltimore Gas & Electric Company	1	John Moraski	None of these requirements warrant a High Risk Factor. Important requirements should not automatically equate to high risk.
Response: The industry determined the VRFs for the standards/requirements by majority vote and used the definitions for High, Medium and Lower violation risk factors in making their selections.			
Dominion Virginia Power VAP	1	William Thompson	EOP-005-0 is superceded by EOP-005-1, so why is it being balloted as version 0? Also, some of the risk factor ratings in the version one standard do not match the corresponding ones in the version zero ballot.
Response: NERC submitted all standards approved by the NERC BOT to FERC and other regulatory authorities for approval. Several of the Version 0 standards that were submitted to FERC and other regulatory authorities have been displaced by Version 1 standards that have also			

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been submitted to the same authorities – however at this point we don't know which standards will receive final approval from these regulatory authorities, so as a precaution, we developed violation risk factors to **all** standards already approved by the NERC BOT. If EOP-005-1 is approved by FERC and other regulatory authorities, then the Version 0 standard and its associated violation risk factors will be retired.			
JDRJC Associates	1	Jim Cyrulewski	Many of the standards will likely be revised because of the FERC NOPR. Thus voting on only risk factors is premature.
Response: NERC expects that most of the standards will be approved by FERC and other regulatory authorities. Note that violation risk factors will only be applicable to standards that receive applicable regulatory approvals.			
Manitoba Hydro	1	Robert George Coish	The general ratings of the factors are too high. While important, many of the requirements do not directly impact real time reliability and can be mitigated over time. Although we don't disagree that some of them should be high, they are explanatory and difficult to measure. The definition of a High risk factor is flawed because it excludes some important items that don't necessarily lead to an outage.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. The drafting team cannot change the definitions for 'High, Medium and Lower' risk factors.			
Pacific Gas & Electric PGAE	1	Chifong Thomas	PG&E understands that the VRF Drafting Team assigned the Violation Risk Factors (VRF) based on the VRF definitions filed by NERC. However, PG&E continues to believe that inconsistency exists in the assignments of the VRFs -- High, Medium or Lower -- amongst similar Standards. That is, while the VRF assigned to each requirement may appear reasonable individually, they are not always consistent when compared to other similar requirements in similar standards. Therefore, PG&E's affirmative vote is made with the expectation that the VRFs will be further reviewed and refined during the three-year review of the entire set of standards planned to be accomplished by NERC's Reliability Standards Development Plan: 2007-2009. PG&E also urges that field tests be conducted to refine the VRFs and to ensure smooth implementation.
Response: Changes to Standards will be addressed by the NERC Reliability Standards Development Plan: 2007-2009 which will review and revise as necessary all reliability standards. Please refer to the posted work plan for details.			
Potomac Electric Power Company PEPW	1	Richard Kafka	CIP-005-0 - why is it MEDIUM risk to have a plan, but HIGH risk to update the plan? They should be the same, and HIGH is reasonable for both, since the requirement to update calls for correcting any deficiencies.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the standard/requirements you reference to override the industry's VRF values.			
Westar Energy WR	1	Allen Klassen	Does not consistently apply the three levels of risk as defined in Appendix 4 of the ERO Sanction Guidelines document.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. The definitions for 'High, Medium, and Lower'			

Company	Segment	Balloter	Comments
risk factors were provided for reference when determining an appropriate risk factor.			
Xcel Energy	1	Gregory Pieper	Requirements are rated high based on importance rather than their risk.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. The definitions for 'High, Medium, and Lower' risk factors were provided for reference when determining an appropriate risk factor.			
California Independent System Operator	2	David Hawkins	Many of the metrics in EOP are rated High. The CISO believes all these metrics should be reassessed and many re-rated as Medium instead of High, especially those that call for having an emergency plan versus those that require taking emergency action. EOP001-0 R1 requires planning and arranging for emergency assistance from remote Balancing Authorities. This may be very difficult to achieve as the adjacent Balancing Authorities may not support plans for wheeling though emergency assistance although they may agree to such arrangements in real-time. Therefore it is difficult to see why R1 should be rated as High when Medium or Lower may be much more appropriate.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the standards/requirements you reference to override the industry's VRF values. Changes to Standards will be addressed by the NERC Reliability Standards Development Plan: 2007-2009 which will review and revise as necessary all reliability standards. Please refer to the posted work plan for details.			
ISO New England Inc ISNE	2	Kathleen Goodman	ISO New England is very supportive of adopting the Emergency Operations standards; however, we are concerned that the proposed Violation Risk Factors are waited too low for this group of Standards. Other than the IROL Standards, the Emergency Operating Standards should be waited as high because of the potential impact on not taking appropriate actions during an emergency situation.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. This ballot did contain many 'HIGH' violation risk factors - these ratings were supported by the majority of stakeholders who participated in the comment periods and by the majority of stakeholders who participated in the initial ballot. These 'HIGH' ratings support your comment.			
Midwest Independent Transmission System Operator, Inc.	2	Terry Bilke	See comments for Modeling ballot.
Response: See Modeling Response			
Ontario - Independent Electricity Market Operator IMO	2	Don Tench	It is IESO's opinion requirements R1 to R4 of standard CIP-001 are crucial for maintaining bulk power system reliability and for the reasons listed below strongly recommend be elevated to HIGH. The CIP-001 requirement to report suspected sabotage/malicious incidents promptly is absolutely critical to the electricity industry being able to respond to emergency events

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			In spite of some improvements over recent years, there remains a relatively low level of awareness regarding the need to report security-related incidents.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the standards/requirements you reference to override the industry's VRF values.			
PJM Interconnection	2	Tom Bowe	The EOP standards are generally rated as very HIGH or MEDIUM by both the industry and PJM. However, there are the following requirements which PJM believes are still rated too high. EOP-001-0 R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance; including provisions to obtain emergency assistance from remote Balancing Authorities HIGH PJM's rating is MEDIUM: Agreements are important to have but not having them will not cause a system collapse EOP-002-0 R2. Each Balancing Authority and Reliability Coordinator shall implement its capacity and energy emergency plan, when required and as appropriate, to reduce risks to the interconnected system. MEDIUM PJM's rating is LOW: "when required" and 'as appropriate' to me define administrative actions EOP-002-0 R3. A Balancing Authority that is experiencing an operating capacity or energy emergency shall communicate its current and future system conditions to its Reliability Coordinator and neighboring Balancing Authorities. MEDIUM PJM's rating is LOW: PJM believes that this is an administrative reporting requirement EOP-002-0 R4. A Reliability Coordinator that is experiencing an operating capacity or energy emergency shall communicate its current and future system conditions to neighboring areas. MEDIUM PJM's rating is LOW: PJM believes that this is an administrative reporting requirement EOP-002-0 R5. A Balancing Authority anticipating an operating capacity or energy emergency shall perform all actions necessary including bringing on all available generation, postponing equipment maintenance, scheduling interchange purchases in advance, and being prepared to reduce firm load. MEDIUM PJM's rating is LOW: PJM believes that this is an administrative requirement EOP-002-0 R6. A deficient Balancing Authority shall only use the assistance provided by the Interconnection's frequency bias for the time needed to implement corrective actions. The Balancing Authority shall not unilaterally adjust generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes. Such

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			unilateral adjustment may overload transmission facilities. MEDIUM PJM's rating is LOW: PJM believes that this is an administrative EOP-002-0 R8. Once the Balancing Authority has exhausted the steps listed in Requirement 7, or if these steps cannot be completed in sufficient time to resolve the emergency condition, the Balancing Authority shall: HIGH PJM's rating is MEDIUM: This is an operating capacity deficiency and not a system collapse condition. The action is important but not HIGH EOP-002-0 R8.1. Manually shed firm load without delay to return its ACE to zero; and HIGH PJM's rating is MEDIUM: This is an operating capacity deficiency and not a system collapse condition. The action is important but not HIGH EOP-002-0 R8.2. Request the Reliability Coordinator to declare an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0 "Energy Emergency Alert Levels." HIGH PJM's rating is LOW: We believe that this is an administrative requirement EOP-002-0 R10. When a Transmission Service Provider expects to elevate the transmission service priority of an Interchange Transaction from Priority 6 (Network Integration Transmission Service from Non-designated Resources) to Priority 7 (Network Integration Transmission Service from designated Network Resources) as permitted in its transmission tariff (See Attachment 1-IRO-006-0 "Transmission Loading Relief Procedure' for explanation of Transmission Service Priorities): HIGH PJM's rating is LOW: We believe that this is an administrative requirement EOP-002-0 R10.1. The deficient Load-Serving Entity shall request its Reliability Coordinator to initiate an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0. HIGH PJM's rating is LOW: We believe that this is an administrative requirement EOP-002-0 R10.2. The Reliability Coordinator shall submit the report to NERC for posting on the NERC Website, noting the expected total MW that may have its transmission service priority changed. HIGH PJM's rating is LOW: We believe that this is an administrative requirement EOP-007-0 R1.4. [High only because of R 1.2's importance.] A requirement to review and update the Regional BCP at least every five years. MEDIUM PJM's rating is LOW: We believe that this is an administrative requirement
Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the standards/requirements you reference to override the industry's VRF values			
Lincoln Electric System LES	3	Bruce E Merrill	Too many Requirements are rated as HIGH based on their importance rather than their risk.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. This ballot did contain many 'HIGH' violation risk			

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factors - these 'HIGH' ratings were supported by the majority of stakeholders who participated in the comment periods and by the majority of stakeholders who participated in the initial ballot.			
Manitoba Hydro MHEB	3	Ronald Dacombe	The general ratings of the factors are too high. While important, many of the requirements do not directly impact real time reliability and can be mitigated over time. Although we don't disagree that some of them should be high, they are explanatory and difficult to measure. The definition of a High risk factor is flawed because it excludes some important items that don't necessarily lead to an outage.
Response: The industry determined the VRFs for the standards/requirements by majority vote. The drafting team cannot change the definitions for 'High, Medium and Lower' risk factors.			
Municipal Electric Authority of Georgia MPWR	3	Steven Jackson	There is still too much uncertainty and ambiguity with the final language and actual method of compliance with these standards to accept these risk factors.
Response: NERC expects that most of the standards will be approved by FERC and other regulatory authorities. Note that violation risk factors will only be applicable to standards that receive applicable regulatory approvals.			
Pacific Gas & Electric Company PGEU	3	Kevin Dasso	We believe a trial period should be included
Response: Based on the preliminary comments from FERC, we do not anticipate approval of a comprehensive trial period.			
Wisconsin Electric Power Marketing WEPM	3	James Keller	EOP-001-0 R1 Medium at the highest. Agreements do not place the BES one step away from a cascading failure. TOP-001-0 R6 requires this independent of agreements. EOP-005-0 R6 This will not place the BES one step away from a cascading failure. Medium at the highest. EOP-005-0 R9.4 This is important but will not hinder restoration since nuclear plants are days away from being available. Medium.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the standards/requirements you reference to override the industry's VRF values.			
Wisconsin Public Service Corporation WPS	3	James Maenner	Too many requirements within the Emergency Operations Standards, which are important components of the standard and for compliance, are rated too high relative to reliability risk impact.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. This ballot did contain much percentage of 'HIGH' violation risk factors - these 'HIGH' ratings were supported by the majority of stakeholders who participated in the comment periods and by the majority of stakeholders who participated in the initial ballot.			
Grant County PUD No.2 GCPD	4	Kevin John Conway	Grant County Supports the development of these factors, but recommends that the violation penalties always be assessed at the lowest monitory levels.
Response: The NERC and Regional Compliance Entities will determine penalties in accordance with the Sanctions Guidelines in the ERO Rules of Procedure.			
Madison Gas and Electric Company MGE	4	Joe Buch	Many of the requirements are unnecessarily classified as HIGH risk. For example, EOP-002-0 R7 etc and R8 etc list violation of any of the

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			actions as all being at HIGH risk. Under operation of the MISO TEMT, each BA is sent a NSI value by MISO such that their ACE remains at zero. For loss of a unit, the MISO market should be sending a new NSI value so that the ACE remains at zero. Thus, the system should not be at HIGH risk if the ACE is none-zero and the BA does not shed firm load without delay.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the standards/requirements you reference to override the industry's VRF values.			
Snohomish County PUD SNPD	4	John Martinsen	It is difficult to assess violation levels of standards when the applicability of the standards is still unclear and has not been addressed. For example standards which apply to Transmission Operators or Transmission Planners should have a much different risk factor whether we are describing a 69 kV networked transmission line serving a local load area of 80 MW versus a 500 kV transmission line that is transferring firm power between large regions, and multiple balancing authorities. The functional model defines Transmission Operator, Transmission Planner, and so on, but does not define transmission, local networks, distribution, and so on. Using the definitions from the NERC reliability standards, “Bulk Electric System” or “Transmission Line” provides no distinction of scale of the system or whether they would have a material impact on reliability of the electric system beyond a local area. Transmission Line: A system of structures, wires, insulators and associated hardware that carry electric energy from one point to another in an electric power system. Lines are operated at relatively high voltages varying from 69 kV up to 765 kV, and are capable of transmitting large quantities of electricity over long distances Bulk Electric System: As defined by the Regional Reliability Organization, the electrical generation resources, transmission lines, interconnections with neighboring systems, and associated equipment, generally operated at voltages of 100 kV or higher. Radial transmission facilities serving only load with one transmission source are generally not included in this definition. Without clear definition of the applicability of the NERC reliability standards I cannot assess the reliability risk associated with violating a particular NERC reliability standard.
Response: The NERC Compliance Organizational Registration process will determine the entities that need to register with the Regional Entities for compliance with the Reliability Standards. The sanctions guidelines provide some latitude in assigning penalties. NERC recognizes the need to refine the applicability section of standards to add more specificity to the description of the entities and facilities addressed by each standard and included the upgrade of the applicability section of standards as one of the focus areas in the NERC Reliability Standards Development Plan: 2007-2009 which will review and revise as necessary all reliability standards. Please refer to the posted work plan for details.			

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Wisconsin Energy Corporation - PM WEC	4	Anthony Jankowski	EOP-001-0 R1 Medium at the highest. Agreements do not place the BES one step away from a cascading failure. TOP-001-0 R6 requires this independent of agreements. EOP-005-0 R6 This will not place the BES one step away from a cascading failure. Medium at the highest. EOP-005-0 R9.4 This is important but will not hinder restoration since nuclear plants are days away from being available. Medium.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the standards/requirements you reference to override the industry's VRF values.			
APGI - Yadkin division	5	Alan Jones	EOP-001-0 R1 Lack of an operating agreement will not bring instability to the system as operators inherently work with each other and are trained to assist others in normal and/or emergency situations. Lower EOP-007-0 R1 should be lower. A requirement to have a database is an administrative function.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the standards/requirements you reference to override the industry's VRF values.			
Dairyland Power Cooperative DPC	5	Warren Schaefer	Risk factors too heavily weighted to HIGH rating
Response: The industry determined the VRFs for the Standards/requirements by majority vote. This ballot did contain many 'HIGH' violation risk factors - these 'HIGH' ratings were supported by the majority of stakeholders who participated in the comment periods and by the majority of stakeholders who participated in the initial ballot.			
Detroit Edison	5	Ronald Bauer	Similar concerns as MISO.
Response: See MISO response			
Manitoba Hydro Power Supply	5	Mark Aikens	The general ratings of the factors are too high. While important, many of the requirements do not directly impact real time reliability and can be mitigated over time. Although we don't disagree that some of them should be high, they are explanatory and difficult to measure. The definition of a High risk factor is flawed because it excludes some important items that don't necessarily lead to an outage.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. This ballot did contain many 'HIGH' violation risk factors - these 'HIGH' ratings were supported by the majority of stakeholders who participated in the comment periods and by the majority of stakeholders who participated in the initial ballot. The drafting team cannot change the definitions for 'High, Medium and Lower' risk factors.			
Michigan Public Power Agency MPPA	5	James Nickel	MPPA's support for these Risk Factors is predicated on the understanding that they will be applied only to those entities which actually have a significant impact on the Bulk Electric System as now defined. Application of medium or high VRFs to violations by entities that have little or no potential to have a material impact on interconnected system operations of the BES is inappropriate.
Response: The NERC Compliance Organizational Registration process will determine the entities that need to register with the Regional Entities for compliance with the Reliability Standards. The sanctions guidelines provide some latitude in assigning penalties. NERC recognizes the need			

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to refine the applicability section of standards to add more specificity to the description of the entities and facilities addressed by each standard and included the upgrade of the applicability section of standards as one of the focus areas in the NERC Reliability Standards Development Plan: 2007-2009 which will review and revise as necessary all reliability standards. Please refer to the posted work plan for details.			
Municipal Electric Authority of Georgia MEAG	5	Roger Brand	There is still too much uncertainty with the final language of these standards to accept these risk factors.
Response: NERC expects that most of the standards will be approved by FERC and other regulatory authorities. Note that violation risk factors will only be applicable to standards that receive applicable regulatory approvals. Changes to Standards will be addressed by the NERC Reliability Standards Development Plan: 2007-2009 which will review and revise as necessary all reliability standards. Please refer to the posted work plan for details.			
Pacific Gas & Electric Company PGEU	5	Richard Padilla	"PG&E understands that the VRF Drafting Team assigned the Violation Risk Factors (VRF) based on the VRF definitions filed by NERC. However, PG&E continues to believe that inconsistency exists in the assignments of the VRFs -- High, Medium or Lower -- amongst similar Standards. That is, while the VRF assigned to each requirement may appear reasonable individually, they are not always consistent when compared to other similar requirements in similar standards. Therefore, PG&E's affirmative vote is made with the expectation that the VRFs will be further reviewed and refined during the three-year review of the entire set of standards planned to be accomplished by NERC's Reliability Standards Development Plan: 2007-2009. PG&E also urges that field tests be conducted to refine the VRFs and to ensure smooth implementation."
Response: Changes to Standards will be addressed by the NERC Reliability Standards Development Plan: 2007-2009 which will review and revise as necessary all reliability standards. Please refer to the posted work plan for details.			
PPL Generation	5	Mark Heimbach	1) There are too many HIGH risks in almost all of the areas. The only HIGH ones should be related to "situational awareness" and "vegetation management." 2) There are several inconsistencies. A couple of examples: TOP-006-0 R3. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide appropriate technical information concerning protective relays to their operating personnel. LOWER PRC-001-0 R1. Each Transmission Operator, Balancing Authority, and Generator Operator shall be familiar with the purpose and limitations of protection system schemes applied in its area. MEDIUM It is MEDIUM risk if a TOP doesn't know the protective schemes but it is LOWER risk if you are not provided with the information. VAR-001-0 R4. The Transmission Operator shall know the status of all transmission reactive power resources, including the status of voltage regulators and power system stabilizers. MEDIUM TOP-002-0 R14. Generator Operators shall, without any intentional time delay, notify their Balancing

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			Authority and Transmission Operator of changes in capabilities and characteristics including but not limited to: MEDIUM TOP-002-0 R14.1. Changes in real and reactive output capabilities. HIGH TOP-002-0 R14.2. Automatic Voltage Regulator status and mode setting. LOWER Is voltage regulator status and generator reactive capability, which is affected by the VR status during a disturbance, HIGH, MEDIUM, or LOW? IRO-002-0 R6. Each Reliability Coordinator shall monitor Bulk Electric System elements (generators, transmission lines, buses, transformers, breakers, etc.) that could result in SOL or IROL violations within its Reliability Coordinator Area. Each Reliability Coordinator shall monitor both real and reactive power system flows, and operating reserves, and the status of Bulk Electric System elements that are or could be critical to SOLs and IROLs and system restoration requirements within its Reliability Coordinator Area. HIGH PER-004-0 R5. Reliability Coordinator operating personnel shall place particular attention on SOLs and IROLs and inter-tie facility limits. The Reliability Coordinator shall ensure protocols are in place to allow Reliability Coordinator operating personnel to have the best available information at all times. MEDIUM Is paying attention to SOL & IROL limits HIGH or MEDIUM?
Response: The industry determined the VRFs for the standards/requirements by majority vote. This ballot did contain many 'HIGH' violation risk factors - these 'HIGH' ratings were supported by the majority of stakeholders who participated in the comment periods and by the majority of stakeholders who participated in the initial ballot. None of the standards/requirements referenced in your comments are in this Emergency Operations sequence of standards addressed by this ballot.			
Wisconsin Electric Power Company	5	Linda Horn	EOP-001-0 R1 Medium at the highest. Agreements do not place the BES one step away from a cascading failure. TOP-001-0 R6 requires this independent of agreements. EOP-005-0 R6 This will not place the BES one step away from a cascading failure. Medium at the highest. EOP-005-0 R9.4 This is important but will not hinder restoration since nuclear plants are days away from being available. Medium.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the standards/requirements you reference to override the industry's VRF values.			
Manitoba Hydro Electric Board MHEB	6	Daniel C Prowse	The general ratings of the factors are too high. While important, many of the requirements do not directly impact real time reliability and can be mitigated over time. Although we don't disagree that some of them should be high, they are explanatory and difficult to measure. The definition of a High risk factor is flawed because it excludes some important items that don't necessarily lead to an outage.

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Response: The industry determined the VRFs for the Standards/requirements by majority vote. This ballot did contain the second greatest percentage of 'HIGH' violation risk factors when compared to the other 8 ballots – only the IRO standards received more 'HIGH' ratings. These 'HIGH' ratings were supported by the majority of stakeholders who participated in the comment periods and by the majority of stakeholders who participated in the initial ballot. The drafting team cannot change the definitions for 'High, Medium and Lower' risk factors.			
Xcel Energy Services Inc	6	David Lemmons	Generally, the standards are still heavily weighted to the high risk end of the matrix and this does not seem reasonable.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. This ballot did contain the second greatest percentage of 'HIGH' violation risk factors when compared to the other 8 ballots – only the IRO standards received more 'HIGH' ratings. These 'HIGH' ratings were supported by the majority of stakeholders who participated in the comment periods and by the majority of stakeholders who participated in the initial ballot.			
ALCOA Inc.	7	Thomas Gianneschi	Although it is important to have an Emergency plan of action that is tested, reviewed and understood, we have to remember it is still only a plan or a document. The EOP requirements that are administrative in nature should be a lower rating. EOP-001-0 R1 should be ranked as medium. Per definition, violation of a medium risk requirement is unlikely to lead to bulk electric system instability. Lack of an operating agreement will not bring instability to the system as operators inherently work with each other and are trained to assist others in normal and/or emergency situations. EOP-007-0 R1 should be lower. A requirement to have a database is an administrative function.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the standards/requirements you reference to override the industry's VRF values.			
Alcoa Inc.	8	Michael Caufield	Do not agree with the following rankings: EOP-001-0 R1 should be ranked as medium not high. EOP-007-0 R1 should be ranked as lower not medium.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the standards/requirements you reference to override the industry's VRF values.			