

Consideration of Comments on Initial Ballot of Version 0 Violation Risk Factors for Transmission Operations and Voltage Control Standards

Version 0 Risk Factors — Transmission Operations and Voltage Control

Summary Consideration: The industry determined the VRFs for the standards/requirements by majority vote. 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	TOP-001-0 R7.3 should be medium not high because it ends with 'at the earliest possible time'. TOP-002-0 R3 and R4 suggest removing the statement "where confidentiality agreements allow".
Response: The industry determined the VRFs for the standards/requirements by majority vote. There are not enough comments on the VRF you reference to override the industry's VRF value. The drafting team cannot make changes to the language of the requirements. 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.			
Ameren Services Company AMSE	1	Peggy L Ladd	For TOP, we disagree with the medium assessment for TOP-002-0 R10 believing it to be high.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the VRF you reference to override the industry's VRF value.			
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.			
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 believes that FERC and other regulatory authorities will approve most of the standards and will direct NERC to follow through with its plan for upgrading the standards over the next several years.			
Manitoba Hydro	1	Robert George	The general ratings of the factors are too high. Although we don't

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		Coish	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. 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 PG&E	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.			
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: There is not enough information in your comment for the team to make a response. Please try to give more detailed information in your future comments. Note that the industry determined the VRFs for the Standards/requirements by majority vote.			
British Columbia Transmission Corporation	2	Phil Park	See attached document which includes comments on five TOP VRFs and one VAR VRF.
Response: The drafting team added your comments and its response to those comments to the end of this document.			
California Independent System Operator	2	David Hawkins	TOP002-0 R14, R14.1 and R14.2 "It is inconsistent to rate one of these metrics as Medium, one High and one Lower. They should all be rated as Medium. TOP002-0 R16, R16.1 and R16.2 "Same comment about inconsistency as above but in this case they should all be rated as High
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			

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ISO New England Inc ISNE	2	Kathleen Goodman	Although ISO New England is voting for the adoption of the Violation Risk Factors as drafted for adoption in these Standards, we believe that there is more work to be done in this area. We support adoption of these Risk Factors for the purpose of moving forward with enforceable Reliability Standards but request that, as these Standards are reviewed and revised to enhance and improve them, these facets, along with the Requirements and other aspects of the Standards be revisited to achieve the ultimate goal of having specific, clear and unambiguous Reliability Standards as envisioned by the industry.
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.			
Midwest Independent Transmission System Operator, Inc.	2	Terry Bilke	See comments for Modeling ballot.
Response: See response for Modeling ballot.			
PJM Interconnection	2	Tom Bowe	Most of the requirements in these standards are rated HIGH or MEDIUM. There were only a few that PJM disagreed with and are shown below. TOP-002-0 R14.1. Changes in real and reactive output capabilities. HIGH PJM's rating is LOW: I believe that this is an administrative requirement; the other sub-requirement R14.2 (change in voltage regulator status) was rated LOWER by the industry. TOP-002-0 R16. Subject to standards of conduct and confidentiality agreements, Transmission Operators shall, without any intentional time delay, notify their Reliability Coordinator and Balancing Authority of changes in capabilities and characteristics including but not limited to: MEDIUM PJM's rating is LOW: If standards of conduct or confidentiality agreements do not allow an entity to notify the RC how can it be a requirement at all? TOP-002-0 R16.1. Changes in transmission facility status. HIGH PJM's rating is LOW: If the major requirement is medium, then the sub-requirements shouldn't be anything higher. This is important but not, by it self, a cause for system collapse. TOP-002-0 R16.2. Changes in transmission facility rating. HIGH PJM's rating is LOW: If the major requirement is medium, then the sub-requirements shouldn't be anything higher. This is important but not, by it self, a cause for system collapse.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the			

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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.			
Manitoba Hydro MHEB	3	Ronald Dacombe	The general ratings of the factors are too high. 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. Making changes to the definitions for 'High, Medium and Lower' risk factors is outside the scope of the drafting team.			
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.			
American Public Power Association	4	Allen Mosher	APPA support for these risk factors is predicated on their application only to TOPs with a material impact on interconnected system operations of the BES as now defined.
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.			
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 monetary levels.
Response: The NERC and Regional Compliance Entities will determine penalties in accordance with the sanctions guidelines included in the ERO Rules of Procedure.			
Madison Gas and Electric Company MGE	4	Joe Buch	Many of the requirements do not justify a HIGH risk factor rating. For example, TOP-001-0 R7.1 the BES should not be at HIGH risk for widespread blackout for a single generator outage.
Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the standard/requirement you reference to override the industry's VRF value.			
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

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			<p>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.</p>
<p>Response: 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.</p>			
APGI - Yadkin division	5	Alan Jones	TOP-001-0 R7.3 should be medium not high because the requirement reads "at the earliest possible time", which is contradictory.
<p>Response: The industry determined the VRFs for the Standards/requirements by majority vote. There are not enough comments on the standard/requirement you reference to override the industry's VRF value. 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.</p>			
Detroit Edison	5	Ronald Bauer	Similar concerns as MISO.
<p>Response: See MISO response.</p>			
Florida Power & Light FPL	5	Bob Birch	VAR-001 Voltage and Reactive Control The proposed VRFs are all

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			High. The VAR-001 Requirements are general statements of principal that are not supported with Measurements and would be very difficult to assess for compliance. This Standard is not currently suitable for compliance enforcement. It should be rewritten and then field tested. Since NERC insists on proceeding with this, The VRF should be Low.
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. 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.			
Manitoba Hydro Power Supply	5	Mark Aikens	The general ratings of the factors are too high. 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.			
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.			
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 PG&E	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

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			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.
<p>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.</p>			
PPL Generation	5	Mark Heimbach	<p>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 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</p>

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			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. 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.			
Manitoba Hydro Electric Board MHEB	6	Daniel C Prowse	The general ratings of the factors are too high. 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. 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.			
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.			
ALCOA Inc.	7	Thomas Gianneschi	TOP-001-0 R7.3 should be medium not high because it ends with "at the earliest possible time". TOP-002-0 R3 and R4 suggest removing the statement "where confidentiality agreements allow".
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. The drafting team cannot make any changes to the requirements. 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.			
Alcoa Inc.	8	Michael Caufield	Do not support TOP-001-0 R7.3 ranking at high. Should be medium as "at the earliest possible time" does not warrant the high ranking. Suggest removing the "where confidentiality agreements allow" statement from TOP-002-0 R3. Suggest removing the "where confidentiality agreements allow" statement from TOP-002-0 R4.
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. The drafting team cannot make any changes to the requirements. Changes to Standards will be addressed by the NERC Reliability Standards Development Plan: 2007-2009 which will review and revise as			

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necessary all reliability standards. Please refer to the posted work plan for details.			

BCTC has some concerns with the recommended VRFs. However, the value of implementing the majority of VRFs for this group of standards overrides the need to resolve our remaining concerns at this time. We provide the following comments for future consideration.

<u>Standard Requirement</u>	<u>NERC VRF</u>	<u>BCTC VRF</u>	<u>Explanation of BCTC VRF</u>
FAC-005-0 R1	Lower	Medium	This VRF refers to having the rating data and should be consistent with R1.1. R1.1 refers to the requirement of rating methodology consistency and has VRF of Medium.
FAC-005-0 R2	Lower	Medium	This VRF refers to the need of providing the rating data and should be consistent with R1.
INT – 001–0 R1 to R5.	Medium	Lower	Violation Risk Factor should be “Lower” as all tagging issues are prior to check out for next hour and implementation into AGC.
INT – 002–0 R1 to R5.	Medium	Lower	Violation Risk Factor should be “Lower” as all tagging issues are prior to check out for next hour and implementation into AGC.
MOD-010-0 R1	Lower	Medium	This is the Requirement for Functional Entities to submit data to RROs, in conjunction with MOD-011-0 R1. This data is used by RROs and other parallel Functional Entities to model interconnected system performance. RROs make this data available for Functional Entities to model other interconnected Entities systems, and this is often the primary source of data. Although the violation risk is not well defined by the Medium category, the risk is certainly higher than that associated with an administrative function. Also, MOD-011-0 R1 is considered High. Violation of MOD-010-0 R1 impinges on the results of performing MOD-011-0 R1, which also supports at least a Medium VRF for MOD-010-0 R1. VRF for MOD-010-0 R1 should be the same as MOD-012-0 R1, R2, and Version 1 MOD Requirements, which are Medium.
MOD-010-0 R2	Lower	Medium	Same explanation as for MOD-010-0 R1. This will make the VRF for MOD-010-0 R2 consistent with the VRF for MOD-011-0 R1.
MOD-011-0 R1	High	Medium	This Requirement is a reporting procedure that applies in conjunction MOD-010-1 R1, specifying how the data is to be reported. While it is certainly an important Requirement, it does not equate to the risk level that could contribute to a widespread outage or delay system restoration. Literally read, it appears to be an administrative function. For the same reasons as MOD-010-0 R1, BCTC believes this requirement should have a VRF of Medium.
MOD-004-0 R1	Lower	Medium	This Requirement is for development and documentation of a methodology. We accept that the documentation is a Lower VRF. However, the development methodology, how CBM is determined, can affect the state of the electrical system, and is therefore a Medium VRF. Subrequirements can remain Lower as they primarily address the requirements of the documentation. Possibly these subrequirements would be more appropriately listed under MOD-005-0 R2, although we understand this is beyond the scope of the Drafting Team. A Medium VRF is consistent with Version 1 MOD

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			Requirements which are Medium.
MOD-008-0 R1	Lower	Medium	Same as for MOD-004-0 R1. A Medium VRF is consistent with Version 1 MOD Requirements which are Medium.
MOD-016-0 R1 and MOD-017-0 R1	Medium Lower	Lower Medium	The VRFs for these two Requirements are reversed. Provision of the data is Medium; documentation is administrative and is Lower.
PRC-005-0 R1.1 to R1.6	High	Medium	PRC-005-0 R1 has a Violation Risk Factor of "Medium" all subsections should have a Violation Risk Factor equal to or less than Medium.
TOP-002-0 R2	Medium	Lower	This is a requirement to ensure Balancing Authority and Transmission Operator personnel participate in system planning and design process. Failure to comply will not lead to a violation that could directly affect the electrical state or the capability of the bulk electric system.
TOP-002-0 R3 & R4	Medium	Lower	This is a requirement that only applies if confidentiality agreements are in place and does not apply to the whole of the bulk power system therefore the factor should be lower.
TOP-002-0 R14.1	High	Medium	The "High" Violation Risk Factor should be reduced to "Medium" as a change in the generator real or reactive power output limit will not lead in itself system instability or cascading.
TOP-002-0 R18	Medium	Lower	Failure to use uniform line identifiers will not affect the state of the electric system. Line identifiers are an administrative matter.
VAR-001-0 R4	Medium	High	If a Transmission Operator of these facilities, incorrect assumptions can directly contribute to widespread outage. Incorrect assumptions regarding reactive power sources can directly contribute to voltage instability. Incorrect assumptions on PSS can directly contribute to transient instability.

Consideration: 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 value(s).