

Proposed Violation Severity Levels for the Emergency Operations Series of Standards:

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Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-001-0 – Emergency Operations Planning					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R1.	The Balancing Authority demonstrated the existence of operating agreements containing provisions for emergency assistance between the Balancing Authority itself and less than 100% but more than 75% of its adjacent Balancing Authorities.	The Balancing Authority demonstrated the existence of operating agreements containing provisions for emergency assistance between the Balancing Authority itself and less than or equal to 75% but more than 50% of its adjacent Balancing Authorities.	The Balancing Authority demonstrated the existence of operating agreements containing provisions for emergency assistance between the Balancing Authority itself and less than or equal to 50% but more than 25% of its adjacent Balancing Authorities.	The Balancing Authority demonstrated the existence of operating agreements containing provisions for emergency assistance between the Balancing Authority itself and for less than or equal to 25% of its adjacent Balancing Authorities.	
Revised R1	N/A	The Balancing Authority demonstrated the existence of an operating agreement(s) with at least one adjacent Balancing Authority for emergency assistance, but the agreement did not include provision for obtaining emergency assistance from any remote Balancing Authority.	N/A	The Balancing Authority did not demonstrate the existence of any operating agreements with adjacent Balancing Authorities that include provision for emergency assistance <u>with adjacent Balancing Authorities</u> .	Modified to reflect the interpretation that indicates the responsible entity must have an agreement with “at least one” adjacent Balancing Authority, but not with “all” adjacent Balancing Authorities. <u>Modified the Moderate to clarify that the Balancing Authority may have more than one agreement and added language to the Severe for</u>

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EOP-001-0 – Emergency Operations Planning					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
					improved clarity.
Original R2.	N/A	N/A	The Transmission Operator demonstrated the existence of an emergency load reduction plan for each identified IROL but at least one of the plans will take longer than 30 minutes to implement.	The Transmission Operator failed to demonstrate the existence of an emergency load reduction plan for all identified IROLs.	
Revised R2.	N/A	N/A	The Transmission Operator demonstrated the existence of an emergency load reduction plan for each identified IROL but at least one of the plans will take longer than 30 minutes to implement.	The Transmission Operator failed to demonstrate the existence of an emergency load reduction plan for all identified IROLs.	No changes made.
Original R3.	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with four (4) of the sub-components.	
Revised R3.	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components. N/A	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components. N/A	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components. N/A	The Transmission Operator or Balancing Authority has failed to comply with four (4) of the sub-components. N/A	No changes made. The VSLs for the primary requirement were removed as there is no required performance in the primary requirement.

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EOP-001-0 – Emergency Operations Planning					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R3.1	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity but the plans are missing one or more program/procedural elements.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity but the plans are not maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity.	
Revised R3.1	N/A	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity but the plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity.	Deleted generic Lower VSL.
Original R3.2	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies on the transmission system but the plans are missing one or more program/procedural elements.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies on the transmission system and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies on the transmission system but the plans are not maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans to mitigate operating emergencies on the transmission system.	

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EOP-001-0 – Emergency Operations Planning					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Revised R3.2	N/A	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies on the transmission system and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies on the transmission system but the plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans to mitigate operating emergencies on the transmission system.	Deleted generic Lower VSL.
Original R3.3	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for load shedding but the plans are missing one or more program/procedural elements.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for load shedding and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for load shedding but the plans are not maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans for load shedding.	
Revised R3.3	N/A	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for load shedding and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for load shedding but the plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans for load shedding.	Deleted generic Lower VSL.
Original R3.4	The Transmission Operator or Balancing Authority’s system restoration plans are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for system restoration but the plans are missing one or more program/procedural	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for system restoration and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for system restoration but the plans are not maintained nor implemented.	

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EOP-001-0 – Emergency Operations Planning					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
		elements.			
Revised R3.4	N/A	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for system restoration and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for system restoration but the plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans for system restoration.	Deleted generic Lower VSL and modified language in all remaining VSLs to match VSLs for R3.1, R3.2, and R3.3.
Original R4.	N/A	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans are missing two (2) of the sub-requirements identified for R4.	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans are missing three (3) or four (4) of the sub-requirements identified for R4.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of emergency plans that will enable it to mitigate operating emergencies.	
Revised R4.	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans do not include sub-requirement R4.4.	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans do not include sub-requirement R4.3.	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans do not include either sub-requirement R4.1 or R4.2.	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans are missing two (2) or more of the sub-requirements identified for R4.	Rolled up subrequirements into the main requirement.

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EOP-001-0 – Emergency Operations Planning					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R4.1	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans are missing the communications protocols to be used during emergencies.	N/A	N/A	N/A	
Revised R4.1	N/A	N/A	N/A	N/A	Rolled up into VSLs for R4.
Original R4.2	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans are missing a list of controlling actions to resolve the emergency.	N/A	N/A	N/A	
Revised R4.2	N/A	N/A	N/A	N/A	Rolled up into VSLs for R4.
Original R4.3	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans are missing a list the tasks to be coordinated	N/A	N/A	N/A	

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EOP-001-0 – Emergency Operations Planning					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
	with and among adjacent Transmission Operators and Balancing Authorities.				
Revised R4.3	N/A	N/A	N/A	N/A	Rolled up into VSLs for R4.
Original R4.4	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans are missing the staffing levels for the emergency.	N/A	N/A	N/A	
Revised R4.4	N/A	N/A	N/A	N/A	Rolled up into VSLs for R4.
Original R5.	The Transmission Operator or Balancing Authority included less than 100% but more than 90% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority included less than or equal to 90% but more than 70% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority included less than or equal to 70% but more than 50% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority included less than or equal to 50% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	

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EOP-001-0 – Emergency Operations Planning					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Revised R5.	The Transmission Operator or Balancing Authority included less than 100% but more than 90% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority included less than or equal to 90% but more than 70% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority included less than or equal to 70% but more than 50% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority included less than or equal to 50% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	No changes.
Original R6	N/A	N/A	N/A	<p>The Transmission Operator or Balancing Authority failed to provide evidence that it reviewed, and updated as appropriate, each of its emergency plans at least once in the past thirteen calendar months.</p> <p>OR</p> <p>The Transmission Operator or Balancing Authority failed to provide a copy of an updated emergency plan to its Reliability Coordinator, all its neighboring Transmission Operators, and all its neighboring Balancing Authorities.</p>	
Revised R6.	N/A	N/A	N/A	The Transmission Operator or Balancing Authority failed to provide evidence that it	Added a reference to the “annual update” in the

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EOP-001-0 – Emergency Operations Planning					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
				<p>completed an annual review, and updated as appropriate, each of its emergency plans <u>appropriately</u>.</p> <p>OR</p> <p>The Transmission Operator or Balancing Authority failed to provide a copy of one of its updated emergency plans to its Reliability Coordinator, all its neighboring Transmission Operators, and all its neighboring Balancing Authorities.</p>	<p>Severe VSL. <u>Changed “as appropriate” to “appropriately.”</u></p>
Original R7.	N/A	The Transmission Operator or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the but the coordination did not include two (2) of the appropriate sub-requirements identified for R7.	The Transmission Operator or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the but the coordination did not include three (3) or four (4) of the appropriate sub-requirements identified for R7.	The Transmission Operator or Balancing Authority failed to demonstrate that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate.	

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EOP-001-0 – Emergency Operations Planning					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Revised R7	The Transmission Operator or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in R7.4 was appropriate <u>applicable</u> and was not included.	The Transmission Operator or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in R7.3 was appropriate <u>applicable</u> and was not included.	The Transmission Operator or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in either R7.1 or R7.2 was appropriate <u>applicable</u> and was not included. .	The Transmission Operator or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in two (2) or more of the sub-requirements was appropriate <u>applicable</u> and was not included.	Modified language to identify specific subrequirements associated with Lower, Moderate and High VSLs. <u>Changed, “appropriate” to “applicable” to use the same language as the requirement.</u>
Original R7.1	The Transmission Operator or Balancing Authority did not establish and maintain reliable communications between interconnected systems as appropriate for the purpose of coordinating emergency plans.	N/A	N/A	N/A	
Revised R7.1	N/A	N/A	N/A	N/A	Rolled up into the VSLs for R7.
Original R7.2	The Transmission Operator or Balancing Authority did not arrange for new	N/A	N/A	N/A	

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EOP-001-0 – Emergency Operations Planning					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
	interchange agreements as appropriate for the purpose of coordinating emergency plans.				
Revised R7.2	N/A	N/A	N/A	N/A	Rolled up into the VSLs for R7.
Original R7.3	The Transmission Operator or Balancing Authority did not coordinate transmission and generator maintenance schedules as appropriate for the purpose of coordinating emergency plans.	N/A	N/A	N/A	
Revised R7.3	N/A	N/A	N/A	N/A	Rolled up into the VSLs for R7.
Original R7.4	The Transmission Operator or Balancing Authority did not arrange deliveries of electrical energy or fuel fro, remote systems as appropriate for the purpose of coordinating emergency plans.	N/A	N/A	N/A	
Revised R7.4	N/A	N/A	N/A	N/A	Rolled up into the VSLs for R7.

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-002-2 Capacity and Energy Emergencies					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R1.	N/A	N/A	N/A	<p>The Balancing Authority or Reliability Coordinator failed to provide evidence that it has responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its respective area.</p> <p>OR</p> <p>The Balancing Authority or Reliability Coordinator did not exercise its authority to alleviate capacity and energy emergencies.</p>	
Revised R1.	N/A	N/A	<p>N/A</p> <p><u>The Balancing Authority or Reliability Coordinator failed to provide evidence that it has responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its respective area.</u></p>	<p>The Balancing Authority or Reliability Coordinator failed to provide evidence that it has responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its respective area.</p> <p>OR</p> <p>The responsible entity failed to exercise its authority to</p>	<p>Modified the second Severe to meet FERC's Guideline 4 – VSLs should be based on a single violation. <u>Moved one of the Severe VSLs to High for consistency between standards.</u></p>

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EOP-002-2 Capacity and Energy Emergencies					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
				alleviate a capacity or energy emergency.	
Original R2.	N/A	N/A	N/A	The Balancing Authority failed to provide evidence that it implemented its capacity and energy emergency plan, when required and as appropriate, to reduce risks to the interconnected system.	
Revised R2.	N/A	N/A	N/A	The Balancing Authority failed to implement its capacity and energy emergency plan, when required and as appropriate, to reduce risks to the interconnected system.	Changed the phrase, “failed to provide evidence that it implemented” to “failed to implement.”
Original R3.	N/A	N/A	The Balancing Authority communicated its current and future system conditions to its Reliability Coordinator but failed to provide evidence that it communicated its current and future system conditions to all of its neighboring Balancing Authorities.	The Balancing Authority failed to provide evidence that it communicated its current and future system conditions to its Reliability Coordinator.	
Revised R3.	N/A	N/A	N/A	The Balancing Authority experienced an operating capacity or energy emergency and failed to communicate its current and	Removed phrase, “provide evidence” and changed to binary.

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EOP-002-2 Capacity and Energy Emergencies					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
				future system conditions to its Reliability Coordinator and its neighboring Balancing Authorities.	
Original R4.	N/A	N/A	N/A	The Balancing Authority anticipating an operating capacity or energy emergency failed to perform all actions necessary including bringing on all available generation, postponing equipment maintenance, scheduling interchange purchases in advance, or preparing to reduce firm load.	
Revised R4.	N/A	N/A	N/A	The Balancing Authority anticipating an operating capacity or energy emergency failed to perform all actions necessary including bringing on all available generation, postponing equipment maintenance, scheduling interchange purchases in advance, or preparing to reduce firm load.	No changes.
Original R5.	N/A	N/A	The Balancing Authority used the assistance provided by the Interconnection's frequency bias for more time	The Balancing Authority used the assistance provided by the Interconnection's frequency bias for more time	

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EOP-002-2 Capacity and Energy Emergencies					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
			than needed to implement corrective actions.	than needed to implement corrective actions. AND The Balancing Authority unilaterally adjusted generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.	
Revised R5.	N/A	N/A	The Balancing Authority used the assistance provided by the Interconnection's frequency bias for more time than needed to implement corrective actions. OR The Balancing Authority unilaterally adjusted generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.	The Balancing Authority used the assistance provided by the Interconnection's frequency bias for more time than needed to implement corrective actions. AND The Balancing Authority unilaterally adjusted generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.	Added a second option for the High VSL.

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EOP-002-2 Capacity and Energy Emergencies					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R6.	N/A	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to implement two (2) of the sub-requirements identified for R6.	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to implement three (3) of the sub-requirements identified for R6.	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to implement four (4) or more of the sub-requirements identified for R6.	
Revised R6.	N/A	N/A	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to immediately implement one (1) of the sub-requirements R6.1, R6.2, R6.3, R6.4, R6.5 or R6.6.	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to immediately implement more than one (1) of the sub-requirements R6.1, R6.2, R6.3, R6.4, R6.5 or R6.6. <u>OR</u> <u>The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and did not immediately implement any remedies.</u>	Eliminated Moderate VSL. Rolled up VSLs for subrequirements into the VSLs for R6. <u>Added commas after “R6.1” in the High and Severe VSLs.</u> <u>Added another option for the Severe VSL to align more closely with the language in the requirement.</u>
Original R6.1	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to load	N/A	N/A	N/A	

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EOP-002-2 Capacity and Energy Emergencies					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
	all available generating capacity.				
Revised R6.1	N/A	N/A	N/A	N/A	Rolled up into R6.
Original R6.2	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to deploy all available operating reserve.	N/A	N/A	N/A	
Revised R6.2	N/A	N/A	N/A	N/A	Rolled up into R6.
Original R6.3	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to interrupt interruptible load and exports.	N/A	N/A	N/A	
Revised R6.3	N/A	N/A	N/A	N/A	Rolled up into R6.
Original R6.4	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to request emergency assistance from other Balancing Authorities.	N/A	N/A	N/A	
Revised R6.4	N/A	N/A	N/A	N/A	Rolled up into R6.

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EOP-002-2 Capacity and Energy Emergencies					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R6.5	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to declare an Energy Emergency through its Reliability Coordinator.	N/A	N/A	N/A	
Revised R6.5	N/A	N/A	N/A	N/A	Rolled up into R6.
Original R6.6	N/A	N/A	N/A	N/A	The Balancing Authority failed to comply with the Control Performance and Disturbance Control Standards and failed to reduce load, through procedures such as public appeals, voltage reductions or curtailing interruptible loads or firm loads.
Revised R6.6	N/A	N/A	N/A	N/A	Rolled up into R6.
Original R7.	N/A	N/A	The Balancing Authority exhausted the steps listed in R6, or if the steps listed in R6 could not be completed in	The Balancing Authority exhausted the steps listed in R6, or if the steps listed in R6 could not be completed in	

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EOP-002-2 Capacity and Energy Emergencies					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
			<p>sufficient time to resolve the emergency condition, and the Balancing Authority failed to provide evidence that it manually shed firm load without delay to return its ACE to zero.</p> <p>OR</p> <p>The Balancing Authority exhausted the steps listed in R6, or if the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to provide evidence that it requested the Reliability Coordinator to declare an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0 “Energy Emergency Alert Levels.”</p>	<p>sufficient time to resolve the emergency condition, and the Balancing Authority failed to provide evidence that it manually shed firm load without delay to return its ACE to zero.</p> <p>AND</p> <p>The Balancing Authority exhausted the steps listed in R6, or if the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to provide evidence that it requested the Reliability Coordinator to declare an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0 “Energy Emergency Alert Levels.”</p>	
Revised R7.	N/A	N/A	The Balancing Authority exhausted the steps listed in R6; or - the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to	The Balancing Authority exhausted the steps listed in R6; or the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to	<p>Rolled up VSLs for subrequirements into the VSLs for R7.</p> <p>Corrected typographical errors in High and</p>

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EOP-002-2 Capacity and Energy Emergencies					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
			meet sub-requirement R7.1. OR The Balancing Authority exhausted the steps listed in R6; or the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirement R7.2.	meet sub-requirement R7.1. AND The Balancing Authority exhausted the steps listed in R6; or the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirement R7.2.	Severe VSLs.
Original R7.1	N/A	N/A	The Balancing Authority exhausted the steps listed in R6, or if the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to provide evidence that it manually shed firm load without delay to return its ACE to zero.	N/A	
Revised R7.1	N/A	N/A	N/A	N/A	Rolled up into R7.
Original R7.2	N/A	N/A	The Balancing Authority exhausted the steps listed in R6, or if the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to provide evidence that it	N/A	

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EOP-002-2 Capacity and Energy Emergencies					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
			requested the Reliability Coordinator to declare an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0 “Energy Emergency Alert Levels.”		
Revised R7.2	N/A	N/A	N/A	N/A	Rolled up into R7.
Original R8.	The Reliability Coordinator’s implementation of an Energy Emergency Alert failed to meet one (1) or two (2) of the program/procedural elements detailed in Attachment 1-EOP-002-0 “Energy Emergency Alert Levels.”	N/A	N/A	The Reliability Coordinator’s implementation of an Energy Emergency Alert failed to meet three (3) or more of the program/procedural elements detailed in Attachment 1-EOP-002-0 “Energy Emergency Alert Levels.”	
Revised R8.	N/A	A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert Level 1 as detailed in Attachment 1-EOP-002-0 “Energy Emergency Alert Levels.” N/A	A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert Level 1 as detailed in Attachment 1-EOP-002-0 “Energy Emergency Alert Levels.” A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area	A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert Level 2 or 3 as detailed in Attachment 1-EOP-002-0 “Energy Emergency Alert Levels.” OR A Reliability Coordinator	Removed the ambiguous language – moved the Lower to High and modified the language to align with the language in the requirement. Moved the High to Moderate, moved the Severe to High, and added a new Severe – to more fully identify

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-002-2 Capacity and Energy Emergencies					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
			experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert Level 2 or 3 as detailed in Attachment 1-EOP-002-0 "Energy Emergency Alert Levels."	had a Balancing Authority within its Reliability Coordinator area experiencing an actual Energy Emergency and the Reliability Coordinator did not act to mitigate the emergency condition by requesting emergency assistance when this was required.	varying degrees of noncompliant performance.
Original R9.	N/A	N/A	The Reliability Coordinator failed to comply with two (2) of the three sub-requirements R9.2, R9.3, or R9.4 of R9.	The Reliability Coordinator failed to comply with the three (3) sub-requirements R9.2, R9.3, and R9.4 of R9.	
Revised R9.	N/A	N/A	N/A	N/A	Removed VSLs from main requirement as it contains no performance.
Original R9.1	N/A	N/A	N/A	The Load-Serving Entity failed to provide evidence that it requested it's Reliability Coordinator to initiate an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0.	
Revised R9.1.	N/A	N/A	N/A	For an expected elevation in transmission service priority from Priority 6 to Priority 7, the deficient Load-Serving Entity failed to request it's	Modified language to align with the language in the requirement.

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-002-2 Capacity and Energy Emergencies					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
				Reliability Coordinator to initiate an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0.	Corrected a typographical error by removing the word, “to” that immediately followed “Reliability Coordinator.”
Original R9.2	The Reliability Coordinator failed submit the report to NERC for posting on the NERC Website, noting the expected total MW that may have its transmission service priority changed.	N/A	N/A	N/A	
Revised R9.2.	N/A	N/A	N/A	The Reliability Coordinator failed to submit the report to NERC for posting on the NERC Website, noting the expected total MW that may have its transmission service priority changed.	Binary – noncompliance is Severe.
Original R9.3	The Reliability Coordinator failed to use EEA 1 to forecast the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.	N/A	N/A	N/A	
Revised R9.3.	N/A	N/A	N/A	The Reliability Coordinator failed to use EEA 1 to forecast the change of the	Binary – noncompliance is Severe.

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-002-2 Capacity and Energy Emergencies					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
				priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.	
Original R9.4	The Reliability Coordinator failed to use EEA 2 to announce the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.	N/A	N/A	N/A	
Revised R9.4.	N/A	N/A	N/A	The Reliability Coordinator failed to use EEA 2 to announce the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.	Binary – noncompliance is Severe.

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-003-1 – Load Shedding Plans					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R1.	N/A	N/A	N/A	The Transmission Operator or Balancing Authority failed to shed customer load.	
Revised R1.	N/A	N/A	N/A	The Transmission Operator or Balancing Authority failed to shed customer load.	No changes.
Original R2.	The Transmission Operator or Balancing Authority’s automatic load shedding plans exist for underfrequency and undervoltage conditions but combined are missing no more than two details or program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority failed to demonstrate the existence of automatic load shedding plans for underfrequency and undervoltage conditions.	Original R2.
Revised R2	N/A	N/A	N/A	The responsible entity did not establish plans for automatic load shedding as directed by the requirement.	VSLs modified per FERC directive.
Original R3.	The Transmission Operator or Balancing Authority demonstrated coordination/communication with all but one of its interconnected Transmission Operators and Balancing Authorities.	N/A	The Transmission Operator or Balancing Authority failed to demonstrate coordination/communication with more than one of its interconnected Transmission Operators and Balancing Authorities.	The Transmission Operator or Balancing Authority failed to coordinate/communicate load shedding plans among any of its interconnected Transmission Operators and Balancing Authorities.	
Revised R3.	The responsible entity did not coordinate load shedding plans, as directed by the	The responsible entity did not coordinate load shedding plans, as directed by the	The responsible entity did not coordinate load shedding plans, as directed by the	The responsible entity did not coordinate load shedding plans, as directed by the	VSLs modified per FERC directive. Language in

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-003-1 – Load Shedding Plans					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
	requirement, affecting 5% or less of its required entities.	requirement, affecting between more than 5-10% <u>up to (and including) 10%</u> of its required entities.	requirement, affecting more than 10-15%, inclusive up to (and including) 15% or less, of its required entities.	requirement, affecting more than 15% of its required entities.	<u>percentages modified for consistency between standards.</u>
Original R4.	The Transmission Operator or Balancing Authority demonstrated the existence of a load shedding scheme but failed to show it considered one of these factors in designing the automatic load shedding scheme: frequency, rate of frequency decay, voltage level, rate of voltage decay, or power flow levels.	N/A	N/A	The Transmission Operator or Balancing Authority failed to demonstrate the existence of an automatic load shedding scheme.	
Revised R4.	N/A	N/A	N/A	The responsible entity failed to consider at least one of the five required elements.	VSLs modified per FERC directive. <u>Modified to more closely match the FERC directive.</u>
Original R5.	N/A	N/A	N/A	The Transmission Operator or Balancing Authority failed to implement load shedding in steps established to minimize the risk of further uncontrolled separation, loss of generation, or system shutdown.	
Revised R5.	N/A	N/A	N/A	The Transmission Operator or Balancing Authority failed to implement load shedding	No changes.

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-003-1 – Load Shedding Plans					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
				in steps established to minimize the risk of further uncontrolled separation, loss of generation, or system shutdown.	
Original R6.	N/A	N/A	N/A	The Transmission Operator or Balancing Authority failed to shed additional load after it had separated from the Interconnection when there was insufficient generating capacity to restore system frequency following automatic underfrequency load shedding.	
Revised R6.	Original R6. N/A	N/A	N/A	The Transmission Operator or Balancing Authority failed to shed additional load after it had separated from the Interconnection when there was insufficient generating capacity to restore system frequency following automatic underfrequency load shedding. N/A	No changes. Corrected typographical error that had shown all VSLs as N/A.
Original R7.	The Transmission Operator or Balancing Authority coordinated automatic load shedding with all the applicable entities, but did not include details on one of the elements identified in R7.	The Transmission Operator or Balancing Authority coordinated automatic load shedding with all the applicable entities, but did not include details on two of the elements identified in R7.	The Transmission Operator or Balancing Authority failed to coordinate load shedding with 100% of the applicable entities but did coordinate load shedding with more than 50% of the applicable	The Transmission Operator or Balancing Authority failed to coordinate automatic load shedding with the 50% or less of the applicable entities.	

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-003-1 – Load Shedding Plans					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
			entities.		
Revised R7.	The responsible entity did not coordinate automatic load shedding with 5% or less of the types of automatic actions described in the Requirement.	The responsible entity did not coordinate automatic load shedding with more than 5% but less than <u>up to (and including)</u> 10% of the types of automatic actions described in the Requirement.	The responsible entity did not coordinate automatic load shedding with <u>more than</u> 10% or more but less than <u>up to (and including)</u> 15% of the types of automatic actions described in the Requirement.	The responsible entity did not coordinate automatic load shedding with <u>more than</u> 15% or more of the types of automatic actions described in the Requirement.	VSLs modified per FERC directive. Language in percentages modified for consistency between standards.
Original R8.	The Transmission Operator or Balancing Authority has plans for manual load shedding but is missing no more than two program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority does not have plans for manual load shedding or is not capable of implanting the load shedding in a time frame adequate for responding to the emergency.	
Revised R8.	N/A	The responsible entity did not have plans for operator controlled manual load shedding, as directed by the requirement.	The responsible entity has plans for manual load shedding but did not have the capability to implement the load shedding, as directed by the requirement.	The responsible entity did not have plans for operator controlled manual load shedding, as directed by the requirement nor had the capability to implement the load shedding, as directed by the requirement.	VSLs modified per FERC directive.

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-004-1 – Disturbance Reporting					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R1.	The Regional Reliability Organization has demonstrated the existence of a regional reporting procedure, but the procedure is missing no more than two details or program/procedural elements.	N/A	N/A	The Regional Reliability Organization does not have a regional reporting procedure.	
Revised R1.	N/A	N/A	N/A	The Regional Reliability Organization does not have a Regional reporting procedure.	Removed Lower.
Original R2.	N/A	The Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity failed to analyze 1% to 25% of its disturbances on the BES or was negligent in the timeliness of analyzing the disturbances 1% to 25% of the time.	The Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity failed to analyze 26% to 50% of its disturbances on the BES or was negligent in the timeliness of analyzing the disturbances 26% to 50% of the time.	The Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity failed to analyze more than 50% of its disturbances on the BES or was negligent in the timeliness of analyzing the disturbances more than 50% of the time	
Revised R2.	The responsible entity failed to promptly analyze 5% or less of its disturbances on the BES.	The responsible entity failed to promptly analyze more than 5% up to <u>(and including)</u> 10% of its disturbances on the BES.	The responsible entity failed to promptly analyze <u>more than</u> 10% up to <u>(and including)</u> -15% of its disturbances on the BES.	The responsible entity failed to promptly analyze <u>more than</u> 15% or more of its disturbances on the BES.	Added a Lower and modified the wording of the Moderate, High and Severe. Language in percentages modified for

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-004-1 – Disturbance Reporting					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
					consistency between standards.
Original R3.	N/A	N/A	N/A	The Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity failed to provide a preliminary written report as directed by the requirement.	
Revised R3.	N/A	N/A	The responsible entity experienced a reportable incident and failed to provide a preliminary written report to either the RRO or NERC one of the following: <input type="checkbox"/> RRO <input type="checkbox"/> NERC	The responsible entity experienced a reportable incident and failed to provide a preliminary written report as directed by the requirement to both the RRO and NERC of the following: <ul style="list-style-type: none"> • RRO • NERC 	Added a High VSL and modified the wording of the Severe VSL. Clarified wording in High and Severe.
Original R3.1	N/A	The Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity submitted the report within 25 to 36 hours of the disturbance or discovery of the disturbance.	The Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity submitted the report within 36 to 48 hours of the disturbance or discovery of the disturbance.	The Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity submitted the report more than 48 hours after the disturbance or discovery of the disturbance.	
Revised R3.1.	The responsible entity submitted the report as	The responsible entity submitted the report as	The responsible entity submitted the report as	The responsible entity submitted the report as	Spread out the number of hours to

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-004-1 – Disturbance Reporting					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
	required in R3.1 more than 24 but less than or equal to 36 hours after of the disturbance or unusual occurrence, or discovery of the disturbance or unusual occurrence	required in R3.1 more than 36 but less than or equal to 48 hours of after the disturbance or unusual occurrence, or discovery of the disturbance or unusual occurrence.	required in R3.1 more than 48 but less than or equal to 72 hours after the disturbance or unusual occurrence, or discovery of the disturbance or unusual occurrence.	required in R3.1. <u>more than</u> 72-hours or more after the disturbance or unusual occurrence, or discovery of the disturbance or unusual occurrence.	span the 24 – 72 hour range, and added a Lower VSL. <u>Modified wording for consistency between VSLs.</u>
Original R3.2.	N/A	N/A	N/A	N/A	
Revised R3.2	N/A	N/A	N/A	N/A	No changes.
Original R3.3	The Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity provided its Regional Reliability Organization(s) and NERC with periodic, verbal updates about a disturbance, but the updates did not include all information that was available at the time.	N/A	N/A	The Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity did not provide its Regional Reliability Organization(s) and NERC with verbal updates about a disturbance as specified in R3.3.	
Revised R3.3.	N/A	N/A	N/A	The responsible entity did not provide its Regional Reliability Organization(s) and NERC with verbal notification or updates about a disturbance as specified in R3.3.	Deleted Lower VSL.
Original	N/A	The Reliability Coordinator,	The Reliability Coordinator,	The Reliability Coordinator,	

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-004-1 – Disturbance Reporting					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
R3.4		Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity submitted the final report 30 or less days late or was missing one of the elements specified in the requirement.	Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity submitted the final report more than 30 days late or was missing two of the elements specified in the requirement.	Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity final report was not submitted or was missing more than two of the elements specified in the requirement.	
Revised R3.4.	The responsible entity submitted the final report no more than 30 days past the 60 day due date; or the final report was missing one of the three elements specified in R3.4.	The responsible entity submitted the final report between 31 days and 60 days inclusive past the 60 day due date. OR The final report was missing two of the three elements specified in R3.4.	The responsible entity submitted the final report between 61 days and 90 days inclusive past the 60 day due date.	The responsible entity failed to submit the final report. OR The responsible entity submitted the final report 91 days or more past the 60 day due date OR The responsible entity submitted a final report that was missing all three of the elements specified in R3.4.	Modified to address timeliness as well as completeness.
Original R4.	N/A	The RRO did not make its representatives on the NERC Operating Committee and Disturbance Analysis Working Group available for the purpose of providing any needed assistance in the	N/A	N/A	

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-004-1 – Disturbance Reporting					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
		investigation and to assist in the preparation of a final report.			
Revised R4.	N/A	N/A	N/A	The RRO did not make its representatives on the NERC Operating Committee and Disturbance Analysis Working Group available for the purpose of providing any needed assistance in the investigation and to assist in the preparation of a final report.	Binary – changed to Severe.
Original R5.	The Regional Reliability Organization reviewed all final report recommendations less than twice a year.	The Regional Reliability Organization reviewed 75% or more final report recommendations twice a year.	The Regional Reliability Organization has not reported on any recommendation that has not been acted on within two years to the NERC Planning and Operating Committees.	The Regional Reliability Organization has not reviewed the final report recommendations or did not notify the NERC Planning and Operating Committees.	
Revised R5.	The Regional Reliability Organization reviewed all final report recommendations less than twice a year.	The Regional Reliability Organization reviewed twice per year <u>for greater than 74.5% or more</u> but less than 100% of the final report recommendations.	The Regional Reliability Organization has not reported on any recommendation that has not been acted on within two years to the NERC Planning and Operating Committees.	The Regional Reliability Organization has not reviewed the final report recommendations <u>at least twice each year</u> or did not notify the NERC Planning and Operating Committees that the recommendations were not being acted upon.	Added more words for clarity. <u>Modified wording of Moderate and Severe VSLs for improved clarity.</u>

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-005-1 – System Restoration Plans					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R1.	The Transmission Operator has a restoration plan that includes 75 % or more but less than 100% of the applicable elements listed in Attachment 1-EOP-005.	The Transmission Operator has a restoration plan that includes 50% to 75% of the applicable elements listed in Attachment 1-EOP-005.	The Transmission Operator has a restoration plan that includes 25% - 50% of the applicable elements listed in Attachment 1-EOP-005.	The Transmission Operator has a restoration plan that includes less than 25% of the applicable elements listed in Attachment 1-EOP-005. OR The Transmission Operator has no restoration plan.	
Revised R1.	N/A The Transmission Operator has a restoration plan that is missing less than 5% of the applicable elements listed in Attachment 1-EOP-005.	The Transmission Operator has a restoration plan that is missing 5% or more but does not address <u>ss than 10%</u> one of the applicable elements listed in Attachment 1-EOP-005.	N/A The Transmission Operator has a restoration plan that is missing 10% or more but less than 15% of the applicable elements listed in Attachment 1-EOP-005.	The Transmission Operator has a restoration plan that is missing 15% or does not address more than one of the applicable elements listed in Attachment 1-EOP-005.	Revise the VSLs to state the % of the performance that was “noncompliant” rather than stating the % of performance that was compliant. <u>Modified to use discrete numbers rather than %.</u>
Original R2.	The Transmission Operator failed to review or update its restoration plan when it made changes in the power system network.	The Transmission Operator failed to review and update its restoration plan at least annually.	The Transmission Operator failed to review and update its restoration plan at least annually or whenever it made changes in the power system network, and failed to correct deficiencies found during the simulated restoration	The Transmission Operator failed to review and update its restoration plan at least annually and whenever it made changes in the power system network, and failed to correct deficiencies found during the simulated	

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-005-1 – System Restoration Plans					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
			exercises.	restoration exercises.	
Revised R2.	The Transmission Operator failed to review or update its restoration plan when it made changes in the power system network.	The Transmission Operator failed to review and update its restoration plan at least annually.	The Transmission Operator failed to review and update its restoration plan at least annually or whenever it made changes in the power system network, and failed to correct deficiencies found during the simulated restoration exercises.	The Transmission Operator failed to review and update its restoration plan at least annually and whenever it made changes in the power system network, and failed to correct deficiencies found during the simulated restoration exercises.	No changes.
Original R3.	N/A	N/A	N/A	The Transmission Operator's restoration plans failed to make restoration of the integrity of the Interconnection a top priority.	
Revised R3.	N/A	N/A	N/A	The Transmission Operator's restoration plans failed to make restoration of the integrity of the Interconnection a priority.	Removed the word, "top" from Severe to align with the language in the requirement.
Original R4.	The Transmission Operator failed to coordinate its restoration plans with one of the entities listed in the requirement.	The Transmission Operator failed to coordinate its restoration plans with two of the entities listed in the requirement.	The Transmission Operator failed to coordinate its restoration plans with three of the entities listed in the requirement.	The Transmission Operator failed to coordinate its restoration plans with four or more of the entities listed in the requirement.	
Revised R4.	The Transmission Operator failed to coordinate its restoration plans with 5% or less of the entities identified in the Requirement <u>5% or less of the entities identified in the requirement.</u>	The Transmission Operator failed to coordinate its restoration plans with more than 5% but less than <u>5% (and including) up to</u> 10% of the entities identified in the	The Transmission Operator failed to coordinate its restoration plans with more than 10% or more, but less than up to (and including) <u>more than 10% (and including)</u> 15% of the entities identified	The Transmission Operator failed to coordinate its restoration plans with more than 15% or more of the entities identified in the Requirement <u>more than 15% (and including) of the entities identified in the requirement.</u>	Revised to state the "% of entities" rather than stating the "number of entities". <u>Removed</u>

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-005-1 – System Restoration Plans					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
		Requirement <u>requirement.</u>	in the Requirement <u>requirement.</u>		<u>capitalization from the word “Requirement.”</u> <u>Language in percentages modified for consistency between standards.</u>
Original R5.	N/A	N/A	The Transmission Operator or Balancing Authority failed to periodically test its telecommunication facilities needed to implement the restoration plan.	N/A	
Revised R5.	N/A	N/A	N/A	The Transmission Operator or Balancing Authority failed to periodically test its telecommunication facilities needed to implement its restoration plan.	Binary – changed to Severe.
Original R6.	The Transmission Operator or Balancing Authority trained less than 100% but greater than or equal to 67 % of its operating personnel in the implementation of the restoration plan.	The Transmission Operator or Balancing Authority trained less than 67 % but greater than or equal to 33 % of its operating personnel in the implementation of the restoration plan.	The Transmission Operator or Balancing Authority trained less than 33 % of its operating personnel in the implementation of the restoration plan.	The Transmission Operator or Balancing Authority did not train any of its operating personnel in the implementation of the restoration plan.	
Revised R6.	The Transmission Operator or Balancing Authority failed to train less than 5% or less of its operating personnel in the	The Transmission Operator or Balancing Authority failed to train more than 5% or more, but less than <u>up to (and including) 10 %</u> of its	The Transmission Operator or Balancing Authority failed to train more than 10 % or more but less than <u>up to (and including) 15%</u> of its	The Transmission Operator or Balancing Authority failed to train more than 15% or more of its operating personnel in the	Revised to state the % of the performance that was “noncompliant”

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-005-1 – System Restoration Plans					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
	implementation of the restoration plan.	operating personnel in the implementation of the restoration plan.	operating personnel in the implementation of the restoration plan.	implementation of the restoration plan.	rather than stating the % of performance that was compliant. Used FERC’s thresholds of 5, 10, and 15%. Language in percentages modified for consistency between standards.
Original R7.	The Transmission Operator or Balancing Authority verified 76% to 99% of the restoration procedure by actual testing or by simulation.	The Transmission Operator or Balancing Authority verified 51% to 75% of the restoration procedure by actual testing or by simulation.	The Transmission Operator or Balancing Authority verified 26% to 50% of the restoration procedure by actual testing or by simulation.	The Transmission Operator or Balancing Authority verified less than 26% of the restoration procedure by actual testing or by simulation.	
Revised R7.	N/A	N/A	N/A	The Transmission Operator or Balancing Authority did not verify the restoration procedure by actual testing or by simulation.	Binary – changed to Severe.
Original R8.	N/A	N/A	N/A	The Transmission Operator failed to verify that the number, size, availability, and location of system blackstart generating units are sufficient to meet Regional Reliability Organization restoration plan	

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-005-1 – System Restoration Plans					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
				requirements for the Transmission Operator’s area.	
Revised R8.	N/A	N/A	N/A	The Transmission Operator failed to verify that the number, size, availability, and location of system blackstart generating units are sufficient to meet Regional Reliability Organization restoration plan requirements for the Transmission Operator’s area.	No changes.
Original R9.	N/A	N/A	<p>The Transmission Operator failed to document the Cranking Paths, including initial switching requirements, between each blackstart generating unit and the unit(s) to be started.</p> <p>OR</p> <p>The Transmission Operator failed to provide the Cranking Paths documentation to an Regional Reliability Organization upon request.</p>	<p>The Transmission Operator failed to document the Cranking Paths, including initial switching requirements, between each blackstart generating unit and the unit(s) to be started.</p> <p>AND</p> <p>The Transmission Operator failed to provide the Cranking Paths documentation to an Regional Reliability Organization upon request.</p>	

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-005-1 – System Restoration Plans					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Revised R9.	N/A	N/A	The Transmission Operator documented the Cranking Paths, including initial switching requirements, between each blackstart generating unit and the unit(s) to be started, but did not provide the documentation as requested by the Regional Reliability Organization.	The Transmission Operator failed to document the Cranking Paths, including initial switching requirements, between each blackstart generating unit and the unit(s) to be started.	Modified the High and Severe VSLs – if the document doesn't exist, it can't be provided to the RRO.
Original R10.	The Transmission Operator only demonstrated, through simulation or testing, that between 67 and 99% of the blackstart generating units in its restoration plan can perform their intended functions as required in the regional restoration plan.	The Transmission Operator only demonstrated, through simulation or testing, that between 33 and 66% of the blackstart generating units in its restoration plan can perform their intended functions as required in the regional restoration plan.	The Transmission Operator only demonstrated, through simulation or testing, that less than 33% of the blackstart generating units in its restoration plan can perform their intended functions as required in the regional restoration plan.	The Transmission Operator did not demonstrate, through simulation or testing, that any of the blackstart generating units in its restoration plan can perform their intended functions as required in the regional restoration plan.	
Revised R10.	For less than 25% of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate , through simulation or testing, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.	For 25% or more, but less than 50% of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate , through simulation or testing, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.	For 50% or more, but less than 75% of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate , through simulation or testing, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.	For 75% or more of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate , through simulation or testing, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.	Revised to state the % of the performance that was “noncompliant” rather than stating the % of performance that was compliant. Adopted “quartile” percentages.

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-005-1 – System Restoration Plans					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R10.1	N/A	N/A	N/A	The Transmission Operator failed to perform the required simulation or testing at least once every five years.	
Revised R10.1	N/A	N/A	N/A	The Transmission Operator failed to perform the required simulation or testing at least once every five years.	No changes.
Original R11.	The Transmission Operator or Balancing Authority failed to comply with less than 25% of the sub-requirements of R11.	The Transmission Operator or Balancing Authority failed to comply with 25% or more and less than 50% of the sub-requirements of R11.	The Transmission Operator or Balancing Authority failed to comply with 50% or more and less than 75% of the sub-requirements of R11.	The Transmission Operator or Balancing Authority failed to comply with more than 75% of the sub-requirements of R11.	
Revised R11.	The responsible entity immediately began to restore the Bulk Electric System to normal and <u>failed to comply with one of the</u> complied with 75% or more, but less than 100% of subrequirements R11.1, R11.2, R11.3, and R11.4.	The responsible entity immediately began to restore the Bulk Electric System to normal and complied with 50% or more, but less than 75% of <u>failed to comply with two of the</u> subrequirements R11.1, R11.2, R11.3, and R11.4.	The responsible entity immediately began to restore the Bulk Electric System to normal and complied with 25% or more but less than 50% of <u>failed to comply with three of the</u> subrequirements R11.1, R11.2, R11.3, and R11.4.	The responsible entity immediately began to restore the Bulk Electric System to normal and complied with less than 25% of <u>failed to comply with all of the</u> subrequirements R11.1, R11.2, R11.3, and R11.4.	Rolled up subrequirements R11.1 through R11.4 into the VSLs for R11. <u>Modified to use discrete numbers rather than percentages.</u>
Original R11.1	The Transmission Operator or Balancing Authority failed to work in conjunction with their Reliability Coordinator to determine the extent and condition of the isolated area(s)	N/A	N/A	N/A	
Revised R11.1	N/A	N/A	N/A	N/A	Rolled up into R11.

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-005-1 – System Restoration Plans					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R11.2	N/A	N/A	The Transmission Operator or Balancing Authority failed to take the necessary actions to restore Bulk Electric System frequency to normal.	N/A	
Revised R11.2	N/A	N/A	N/A	N/A	Rolled up into R11.
Original R113	N/A	N/A	The Balancing Authority failed to make all attempts to maintain adjusted Interchange Schedules as required in R11.3	The Balancing Authority failed to immediately review the Interchange Schedules between those Balancing Authority Areas or fragments of those Balancing Authority Areas within the separated area and make adjustments to facilitate the restoration as required in R11.3.	
Revised R11.3	N/A	N/A	N/A	N/A	Rolled up into R11.
Original R11.4	N/A	N/A	The Transmission Operator failed to give high priority to restoration of off-site power to nuclear stations.	N/A	
Revised R11.4	N/A	N/A	N/A	N/A	Rolled up into R11.
Original R11.5	N/A	N/A	N/A	The Transmission Operator attempted to resynchronize an isolated area(s) with a surrounding area(s) when one (1) or more of the sub-requirements of R11.5 were not met.	

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-005-1 – System Restoration Plans

R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Revised R11.5	N/A	N/A	N/A	The Transmission Operator attempted to resynchronize an isolated area(s) with a surrounding area(s) when one (1) or more of the sub-requirements of R11.5 were not met.	No changes. Rolled up sub—sub-requirements R11.5.1 through R11.5.4
Original R11.5.1	N/A	N/A	N/A	The Transmission Operator attempted to resynchronize an isolated area(s) with a surrounding area(s) when sub-requirement R11.5.1 was not met.	
Revised R11.5.1	N/A	N/A	N/A	The Transmission Operator attempted to resynchronize an isolated area(s) with a surrounding area(s) when sub-requirement R11.5.1 was not met. NA	No changes. Rolled up into R11.5
Original R11.5.2	N/A	N/A	N/A	The Transmission Operator attempted to resynchronize an isolated area(s) with a surrounding area(s) when sub-requirement R11.5.2 was not met.	
Revised R11.5.2	N/A	N/A	N/A	NA The Transmission Operator attempted to resynchronize an isolated area(s) with a surrounding area(s) when sub-requirement R11.5.2 was not met.	Rolled up into R11.5 No changes.

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-005-1 – System Restoration Plans					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R11.5.3	N/A	N/A	N/A	The Transmission Operator attempted to resynchronize an isolated area(s) with a surrounding area(s) when sub-requirement R11.5.3 was not met.	
Revised R11.5.3	N/A	N/A	N/A	NA The Transmission Operator attempted to resynchronize an isolated area(s) with a surrounding area(s) when sub-requirement R11.5.3 was not met.	Rolled up into R11.5 No changes.
Original R11.5.4	N/A	N/A	N/A	The Transmission Operator attempted to resynchronize an isolated area(s) with a surrounding area(s) when sub-requirement R11.5.4 was not met.	
Revised R11.5.4	N/A	N/A	N/A	NA The Transmission Operator attempted to resynchronize an isolated area(s) with a surrounding area(s) when sub-requirement R11.5.4 was not met.	Rolled up into R11.5 No changes.

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-006-1 – Reliability Coordination – System Restoration					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R1.	The Reliability Coordinator is aware of more than 75% but less than 100% of its Transmission Operators restoration plans.	The Reliability Coordinator is aware of more than 50% but less than 75% of its Transmission Operators restoration plans.	The Reliability Coordinator is aware of more than 25% but less than 50% of its Transmission Operators restoration plans.	The Reliability Coordinator is not aware of any of its Transmission Operators restoration plans.	
Revised R1.	The Reliability Coordinator is not aware of less than 5% <u>or less</u> of its Transmission Operators’ restoration plans.	The Reliability Coordinator is not aware of more than 5% or more, but less than <u>up to (and including) 10%</u> of its Transmission Operators’ restoration plans.	The Reliability Coordinator is not aware of more than 10% or more, but less than <u>up to (and including) 15%</u> of its Transmission Operators’ restoration plans.	The Reliability Coordinator is not aware of more than 15% or more of its Transmission Operators’ restoration plans.	Revised to state the % of the performance that was “noncompliant” rather than stating the % of performance that was compliant. Used % thresholds from FERC. <u>Made minor typographical edits. Language in percentages modified for consistency between standards.</u>
Original R2.	N/A	N/A	The Reliability Coordinator failed to monitor restoration progress or failed to coordinate assistance.	The Reliability Coordinator failed to monitor restoration progress and failed to coordinate assistance.	
Revised R2.	N/A	N/A	The Reliability Coordinator failed to monitor restoration progress or failed to coordinate assistance.	The Reliability Coordinator failed to monitor restoration progress and failed to coordinate assistance.	No changes.

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-006-1 – Reliability Coordination – System Restoration					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R3.	N/A	The Reliability Coordinator's Reliability Coordinator Area restoration plan did not coordinate with one individual Transmission Operator restoration plans.	The Reliability Coordinator's Reliability Coordinator Area restoration plan did not coordinate with more than one individual Transmission Operator restoration plans.	The Reliability Coordinator does not have a Reliability Coordinator Area restoration plan.	
Revised R3.	N/A	The Reliability Coordinator's Reliability Coordinator Area restoration plan did not provide coordination between less than 10% of its individual Transmission Operator restoration plans.	The Reliability Coordinator's Reliability Coordinator Area restoration plan did not provide coordination between 10% or more of the Transmission Operator restoration plans.	The Reliability Coordinator does not have a Reliability Coordinator Area restoration plan. OR The Reliability Coordinator's Reliability Coordinator Area restoration plan does not ensure reliability is maintained during system restoration events.	Revised to use a percentage approach to measure the number of plans that were not coordinated and to better align the language in the Severe with the language in the requirement.
Original R4.	The Reliability Coordinator failed to disseminate information regarding restoration to one neighboring Reliability Coordinator or Transmission Operator or Balancing Authority not immediately involved in restoration.	The Reliability Coordinator failed to disseminate information regarding restoration to two neighboring Reliability Coordinators or Transmission Operators or Balancing Authorities not immediately involved in restoration.	The Reliability Coordinator failed to disseminate information regarding restoration to three neighboring Reliability Coordinators or Transmission Operators or Balancing Authorities not immediately involved in restoration.	The Reliability Coordinator failed to disseminate information regarding restoration to four or more neighboring Reliability Coordinators or Transmission Operators or Balancing Authorities not immediately involved in restoration.	
Revised R4.	N/A	N/A	N/A	The Reliability Coordinator failed to serve as primary	Revised to reflect that the

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-006-1 – Reliability Coordination – System Restoration					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
				contact for disseminating information regarding restoration in accordance with Requirement R4.	requirement does not include actual dissemination of information. Changed to binary - Severe
Original R5.	N/A	N/A	N/A	The Reliability Coordinator failed to approve, communicate, and coordinate the re-synchronizing of major system islands or synchronizing points and caused a Burden on adjacent Transmission Operator, Balancing Authority, or Reliability Coordinator Areas.	
Revised R5.	N/A	N/A	N/A	The Reliability Coordinator failed to approve, communicate, and coordinate the re-synchronizing of major system islands or synchronizing points as stated in Requirement R5.	Modified wording for clarity.
Original R6.	N/A	N/A	N/A	The Reliability Coordinator failed to take actions to restore normal operations once an operating emergency was mitigated in accordance with its restoration plan.	
Revised R6.	N/A	N/A	N/A	The Reliability Coordinator failed to take actions to	No changes.

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-006-1 – Reliability Coordination – System Restoration					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
				restore normal operations once an operating emergency was mitigated in accordance with its restoration plan.	

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-008-1 – Plans for Loss of Control Center Functionality					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R1.	The Reliability Coordinator, Transmission Operator or Balancing Authority plan to continue reliability operations in the event its control center becomes inoperable failed to comply with one (1) of the sub-requirements of R1.	The Reliability Coordinator, Transmission Operator or Balancing Authority plan to continue reliability operations in the event its control center becomes inoperable failed to comply with two (2) of the sub-requirements of R1.	The Reliability Coordinator, Transmission Operator or Balancing Authority plan to continue reliability operations in the event its control center becomes inoperable failed to comply with three (3) or four (4) of the sub-requirements of R1.	The Reliability Coordinator, Transmission Operator or Balancing Authority plan to continue reliability operations in the event its control center becomes inoperable failed to comply with more then four (4) of the sub-requirements of R1.	
Revised R1.	The responsible entity’s plan to continue reliability operations in the event its control center becomes inoperable failed to comply with one (1) of the sub-requirements (R1.1, R1.2, R1.3, R1.4, R1.5, R1.6, R1.7, or R1.8).	The responsible entity’s plan to continue reliability operations in the event its control center becomes inoperable failed to comply with two (2) of the subrequirements (R1.1, R1.2, R1.3, R1.4, R1.5, R1.6, R1.7, or R1.8).	The responsible entity’s plan to continue reliability operations in the event its control center becomes inoperable failed to comply with three (3) or four (4) of the subrequirements (R1.1, R1.2, R1.3, R1.4, R1.5, R1.6, R1.7, or R1.8).	The responsible entity’s plan to continue reliability operations in the event its control center becomes inoperable failed to comply with more then four (4) of the subrequirements (R1.1, R1.2, R1.3, R1.4, R1.5, R1.6, R1.7, or R1.8).	Rolled up subrequirements into R1. Changed “sub-requirements” to “subrequirements” in the Lower VSL for consistency.
Original R1.1	The Reliability Coordinator, Transmission Operator or Balancing Authority contingency plan relies on data or voice communication from the primary control facility for up to 25% of the functions identified in R1.2 and R1.3.	The Reliability Coordinator, Transmission Operator or Balancing Authority contingency plan relies on data or voice communication from the primary control facility for 25% to 50% of the functions identified in R1.2 and R1.3.	The Reliability Coordinator, Transmission Operator or Balancing Authority contingency plan relies on data or voice communication from the primary control facility for 50% to 75% of the functions identified in R1.2 and R1.3.	The Reliability Coordinator, Transmission Operator or Balancing Authority contingency plan relies on data and voice communication from the primary control facility for more than 75% of the functions identified in R1.2 and R1.3.	
Revised R1.1	N/A	N/A	N/A	N/A	Rolled up into R1.

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-008-1 – Plans for Loss of Control Center Functionality					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R1.2	The Reliability Coordinator, Transmission Operator or Balancing Authority plan failed to include procedures and responsibilities for providing basic tie line control and procedures and for maintaining the status of all inter-area schedules, such that there is an hourly accounting of all schedules.	N/A	N/A	N/A	
Revised R1.2	N/A	N/A	N/A	N/A	Rolled up into R1.
Original R1.3	The Reliability Coordinator, Transmission Operator or Balancing Authority contingency plan failed to address one of the elements listed in the requirement.	The Reliability Coordinator, Transmission Operator or Balancing Authority contingency plan failed to address two of the elements listed in the requirement.	The Reliability Coordinator, Transmission Operator or Balancing Authority contingency plan failed to address three of the elements listed in the requirement.	The Reliability Coordinator, Transmission Operator or Balancing Authority contingency plan failed to address four or more of the elements listed in the requirement.	
Revised R1.3	N/A	N/A	N/A	N/A	Rolled up into R1.
Original R1.4	The Reliability Coordinator, Transmission Operator or Balancing Authority plan failed to include procedures and responsibilities for maintaining basic voice communication capabilities with other areas.	N/A	N/A	N/A	
Revised R1.4	N/A	N/A	N/A	N/A	Rolled up into R1.

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-008-1 – Plans for Loss of Control Center Functionality					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R1.5	The Reliability Coordinator, Transmission Operator or Balancing Authority plan failed to include procedures and responsibilities for conducting periodic tests, at least annually, to ensure viability of the plan.	N/A	N/A	N/A	
Revised R1.5	N/A	N/A	N/A	N/A	Rolled up into R1.
Original R1.6	The Reliability Coordinator, Transmission Operator or Balancing Authority plan failed to include procedures and responsibilities for providing annual training to ensure that operating personnel are able to implement the contingency plans.	N/A	N/A	N/A	
Revised R1.6	N/A	N/A	N/A	N/A	Rolled up into R1.
Original R1.7	The Reliability Coordinator, Transmission Operator or Balancing Authority plan was reviewed within three months of passing its annual review date.	The Reliability Coordinator, Transmission Operator or Balancing Authority plan was reviewed within six months of passing its annual review date.	The Reliability Coordinator, Transmission Operator or Balancing Authority plan was reviewed within nine months of passing its annual review date.	The Reliability Coordinator, Transmission Operator or Balancing Authority plan was reviewed more than nine months of passing its annual review date.	
Revised R1.7	N/A	N/A	N/A	N/A	Rolled up into R1.
Original R1.8	The Reliability Coordinator, Transmission Operator or	N/A	N/A	N/A	

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-008-1 – Plans for Loss of Control Center Functionality					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
	Balancing Authority failed to make interim provisions when it took more than one hour to implement the contingency plan for loss of primary control facility.				
Revised R1.8	N/A	N/A	N/A	N/A	Rolled up into R1.

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-009-1 – Documentation of Blackstart Generating Unit Test Results					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
Original R1.	The Generator Operator blackstart unit testing and recording is missing no more than two program/procedural elements.	Startup and testing of each blackstart unit was performed, but the testing records are incomplete. The testing records are missing 25% or less of data requested in the requirement.	The Generator Operator failed to test 25% or less of the blackstart units or testing records are incomplete. The testing records are missing between 25% and 50% of data requested in the requirement.	The Generator Operator failed to test more than 25% of its blackstart units or does not have blackstart testing records or is missing more than 50% of the required data.	
Revised R1.	The Generator Operator's testing records for Requirement R1 are missing up to 5% or less of the required information.	The Generator Operator failed to test more than 5% or more but less than <u>up to (and including) 10%</u> of the required blackstart units. OR The Generator Operator's testing records for Requirement R1 are missing 5% or more, but less than 10% of the required information.	The Generator Operator failed to test more than 10% or more but less than <u>up to (and including) 15%</u> of the required blackstart units OR The Generator Operator's testing records for Requirement R1 are missing 10% or more, but less than 15% of the required information.	The Generator Operator failed to test more than 15% or more of the required blackstart units. OR The Generator Operator's testing records for Requirement R1 are missing 15% or more of the required information.	Deleted generic language from Lower. Modified percentages to use FERC thresholds of 5%, 10% and 15%. Modified to clearly address both testing and documentation aspects of the requirement. <u>Corrected typographical errors.</u> <u>Language in percentages modified for consistency between standards.</u>
Original	The Generator Operator has	N/A	N/A	The Generator Operator did	

Proposed Violation Severity Levels for the emergency Operations Series of Standards

EOP-009-1 – Documentation of Blackstart Generating Unit Test Results					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Comments
R2.	provided the blackstart testing documentation to its Regional Reliability Organization. However the documentation provided had no more than two missing program/procedural elements or failed to provide the documentation requested to NERC within 30 days.			not provide the required blackstart documentation to its Regional Reliability Organization.	
Revised R2.	N/A	N/A	N/A	The Generator Owner or Generator Operator did not provide the required blackstart documentation to its Regional Reliability Organization <u>or upon request to NERC.</u>	Removed Lower as it expanded on the requirement – added the Generator Owner to the Severe. <u>Added language to supply documentation to NERC upon request.</u>