

**Proposed Violation Severity Levels for the INT, PER, NUC Series of Standards:**

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Standard Number INT-001-32 Interchange Information

R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1	The Load-Serving, Purchasing-Selling Entity experienced one instance of failing to ensure that Arranged Interchange was submitted to the Interchange Authority for: (see below)	The Load-Serving, Purchasing-Selling Entity experienced two instances of failing to ensure that Arranged Interchange was submitted to the Interchange Authority for: (see below)	The Load-Serving, Purchasing-Selling Entity experienced three instances of failing to ensure that Arranged Interchange was submitted to the Interchange Authority for: (see below)	The Load-Serving, Purchasing-Selling Entity experienced four instances of failing to ensure that Arranged Interchange was submitted to the Interchange Authority for: (see below)	
Revised R1	The Load-Serving, Purchasing-Selling Entity failed to submit one Dynamic Schedule at the expected average MW profile for an hour to the Interchange Authority; as per R1.1.	The Load-Serving, Purchasing-Selling Entity failed to submit two Dynamic Schedules at the expected average MW profile for an hour to the Interchange Authority; as per R1.1.	The Load-Serving, Purchasing-Selling Entity failed to submit three Dynamic Schedules at the expected average MW profile for an hour to the Interchange Authority; as per R1.1.	The Load-Serving, Purchasing-Selling Entity failed to submit four or more Dynamic Schedules at the expected average MW profile for an hour to the Interchange Authority; as per R1.1.	Rolled up the sub-requirement and made language consistent with the requirement per FERC Guideline 3.
Original R1.1	The Load-Serving, Purchasing-Selling Entity experienced one instance of failing to ensure that Arranged Interchange was submitted to the Interchange Authority for all Dynamic Schedules at the expected average MW profile for each hour.	The Load-Serving, Purchasing-Selling Entity experienced two instances of failing to ensure that Arranged Interchange was submitted to the Interchange Authority for all Dynamic Schedules at the expected average MW profile for each hour.	The Load-Serving, Purchasing-Selling Entity experienced three instances of failing to ensure that Arranged Interchange was submitted to the Interchange Authority for all Dynamic Schedules at the expected average MW profile for each hour.	The Load-Serving, Purchasing-Selling Entity experienced four instances of failing to ensure that Arranged Interchange was submitted to the Interchange Authority for all Dynamic Schedules at the expected average MW profile for each hour.	
Revised R1.1	N/A	N/A	N/A	N/A	Rolled up into R1.

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Standard Number INT-001-~~3~~<sup>2</sup> Interchange Information

R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R2	The Sink Balancing Authority experienced one instance of failing to ensure that Arranged Interchange was submitted to the Interchange Authority (see below)	The Sink Balancing Authority experienced two instances of failing to ensure that Arranged Interchange was submitted to the Interchange Authority (see below)	The Sink Balancing Authority experienced three instances of failing to ensure that Arranged Interchange was submitted to the Interchange Authority (see below)	The Sink Balancing Authority experienced four instances of failing to ensure that Arranged Interchange was submitted to the Interchange Authority (see below)	
Revised R2	The Sink Balancing Authority failed to submit one Arranged Interchange to the Interchange Authority as per R2.1 and R2.2.	The Sink Balancing Authority failed to submit two Arranged Interchanges to the Interchange Authority as per R2.1 and R2.2.	The Sink Balancing Authority failed to submit three Arranged Interchanges to the Interchange Authority as per R2.1 and R2.2.	The Sink Balancing Authority failed to submit four or more Arranged Interchanges to the Interchange Authority as per R2.1 and R2.2.	Rolled up the sub-requirements and made language consistent with the requirement per FERC Guideline 3. <a href="#">Corrected grammar.</a>
Original R2.1	The Sink Balancing Authority experienced one instance of failing to ensure that Arranged Interchange was submitted to the Interchange Authority if a Purchasing-Selling Entity was not involved in the Interchange, such as delivery from a jointly owned generator.	The Sink Balancing Authority experienced two instances of failing to ensure that Arranged Interchange was submitted to the Interchange Authority if a Purchasing-Selling Entity was not involved in the Interchange, such as delivery from a jointly owned generator.	The Sink Balancing Authority experienced three instances of failing to ensure that Arranged Interchange was submitted to the Interchange Authority if a Purchasing-Selling Entity was not involved in the Interchange, such as delivery from a jointly owned generator.	The Sink Balancing Authority experienced four instances of failing to ensure that Arranged Interchange was submitted to the Interchange Authority if a Purchasing-Selling Entity was not involved in the Interchange, such as delivery from a jointly owned generator.	
Revised R2.1	N/A	N/A	N/A	N/A	Rolled up into R2.

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Standard Number INT-001-~~3~~<sup>2</sup> Interchange Information

R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R2.2	The Sink Balancing Authority experienced one instance of failing to ensure that Arranged Interchange was submitted to the Interchange Authority for each bilateral Inadvertent Interchange payback.	The Sink Balancing Authority experienced two instances of failing to ensure that Arranged Interchange was submitted to the Interchange Authority for each bilateral Inadvertent Interchange payback.	The Sink Balancing Authority experienced three instances of failing to ensure that Arranged Interchange was submitted to the Interchange Authority for each bilateral Inadvertent Interchange payback.	The Sink Balancing Authority experienced four instances of failing to ensure that Arranged Interchange was submitted to the Interchange Authority for each bilateral Inadvertent Interchange payback.	
Revised R2.2	N/A	N/A	N/A	N/A	Rolled up into R2.

Standard Number INT-003-2 Interchange Transaction Implementation					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1	There shall be a separate Lower VSL, if either of the following conditions exists: One instance of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2. One instance of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2	There shall be a separate Moderate VSL, if either of the following conditions exists: Two instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2. Two instances of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2	There shall be a separate High VSL, if either of the following conditions exists: Three instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2. Three instances of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2	There shall be a separate Severe VSL, if either of the following conditions exists: Four or more instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2. Four or more instances of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2	
Revised R1	N/A	The responsible entity confirmed Interchange Schedule with the Sending Balancing Authority prior to implementation in the Balancing Authority ACE equation and the responsible Entities reached agreement; and coordinated the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2; but the agreement did not include one of the elements required in sub-	The responsible entity confirmed Interchange Schedule with the Sending Balancing Authority prior to implementation in the Balancing Authority ACE equation and the responsible Entities reached agreement but did not coordinate the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2.	The responsible entity failed to confirm Interchange Schedule with the Sending Balancing Authority prior to implementation in the Authority's ACE equation.  OR  The responsible entity failed to agree on the interchange as received from the Interchange Authority prior to	Rolled up sub-requirements and removed occurrences.

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Standard Number INT-003-2 Interchange Transaction Implementation					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
		requirements R.1.1.1 or R.1.1.2.		implementation in the Balancing Authority's ACE equation.	
Original R1.1	The Balancing Authority experienced one instance of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.	The Balancing Authority experienced two instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.	The Balancing Authority experienced three instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.	The Balancing Authority experienced four instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.	
Revised R1.1	N/A	N/A	N/A	N/A	Rolled up into R1.
Original R1.1.1	The Balancing Authority experienced one instance of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.	The Balancing Authority experienced two instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.	The Balancing Authority experienced three instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.	The Balancing Authority experienced four instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.	
Revised R1.1.1	N/A	N/A	N/A	N/A	Rolled up into R1.
Original R1.1.2	The Balancing Authority experienced one instance of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.	The Balancing Authority experienced two instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.	The Balancing Authority experienced three instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.	The Balancing Authority experienced four instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.	

Standard Number INT-003-2 Interchange Transaction Implementation					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Revised R1.1.2	N/A	N/A	N/A	N/A	Rolled up into R1.
Original R1.2	The sending or receiving Balancing Authority experienced one instance of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2	The sending or receiving Balancing Authority experienced two instances of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2	The sending or receiving Balancing Authority experienced three instances of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2	The sending or receiving Balancing Authority experienced four instances of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2	
Revised R1.2	N/A	N/A	N/A	N/A	Rolled up into R1.

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Standard Number INT-004-24 Dynamic Interchange Transaction Modifications					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1	The entity that initiated the curtailment failed to communicate the transaction reload to the Sink Balancing Authority	The entity that initiated the curtailment failed to reload the transaction and failed to communicate to the Sink Balancing Authority	N/A	N/A	
Revised R1	The responsible entity that initiated a curtailment released the limit on the Interchange Transaction tag, at such time as the <u>reliability event allowed for the reloading of the transaction</u> , but failed to communicate the release of the limit to the Sink Balancing Authority.	N/A	N/A	The responsible entity that initiated a curtailment failed to release the limit on the Interchange Transaction tag, at such time as the <u>reliability event allowed for the reloading of the transaction</u> , but <del>and</del> failed to communicate the release of the limit to the Sink Balancing Authority.	Moved Moderate to Severe and made language consistent with the requirement per FERC guideline 3. <u>Modified for consistency with the language in the requirement.</u>
Original R2	The Purchase-Selling entity failed to update the tags when required less than 25% of times it was required, as determined in R2.1, R2.2, or R2.3.	The Purchase-Selling entity failed to update the tags when required 25% or more and less than 50% of the times it was required, as determined in R2.1, R2.2, or R2.3.	The Purchase-Selling entity failed to update the tags when required 50% or more but less than 75% of the times it was required, as determined in R2.1, R2.2, or R2.3.	The Purchase-Selling entity failed to update the tags when required 75% or more of the times it was required, as determined in R2.1, R2.2, or R2.3.	
Revised R2	N/A	N/A	The <del>Responsible</del> <u>responsible Entity</u> failed to update the tag when required by sub-requirements R2.1 or R2.2.	The <del>Responsible</del> <u>responsible Entity</u> failed to update the tag when required by sub-requirement R2.3.	Rolled up sub-requirements and removed occurrences. <u>Removed capitalization from “responsible entity.”</u>

Standard Number INT-004-24 Dynamic Interchange Transaction Modifications					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R2.1	The Purchase-Selling entity failed to update the tags when required less than 25% of times it was required.	The Purchase-Selling entity failed to update the tags when required 25% or more and less than 50% of the times it was required.	The Purchase-Selling entity failed to update the tags when required 50% or more but less than 75% of the times it was required.	The Purchase-Selling entity failed to update the tags when required 75% or more of the times it was required.	
Revised R2.1	N/A	N/A	N/A	N/A	Rolled up into R2.
Original R2.2	The Purchase-Selling entity failed to update the tags when required less than 25% of times it was required.	The Purchase-Selling entity failed to update the tags when required 25% or more and less than 50% of the times it was required.	The Purchase-Selling entity failed to update the tags when required 50% or more but less than 75% of the times it was required.	The Purchase-Selling entity failed to update the tags when required 75% or more of the times it was required.	
Revised R2.2	N/A	N/A	N/A	N/A	Rolled up into R2.
Original R2.3	The Purchase-Selling entity failed to update the tags when required less than 25% of times it was required.	The Purchase-Selling entity failed to update the tags when required 25% or more and less than 50% of the times it was required.	The Purchase-Selling entity failed to update the tags when required 50% or more but less than 75% of the times it was required.	The Purchase-Selling entity failed to update the tags when required 75% or more of the times it was required.	
Revised R2.3	N/A	N/A	N/A	N/A	Rolled up into R2.

Standard Number INT-005-24 Interchange Authority Distributes Arranged Interchange					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1	The Interchange Authority experienced one occurrence of not distributing information to all involved reliability entities.	The Interchange Authority experienced two occurrences of not distributing information to all involved reliability entities	The Interchange Authority experienced three occurrences of not distributing information to all involved reliability entities,	The Interchange Authority experienced four occurrences of not distributing information to all involved reliability entities	
Revised R1	Prior to the expiration of the time period defined in the Timing Table, Column A, the Interchange Authority distributed the Arranged Interchange information for reliability assessment to all but one of the reliability entities involved in the Interchange.	Prior to the expiration of the time period defined in the Timing Table, Column A, the Interchange Authority distributed the Arranged Interchange information for reliability assessment to all but two of the reliability entities involved in the Interchange.	Prior to the expiration of the time period defined in the Timing Table, Column A, the Interchange Authority distributed the Arranged Interchange information for reliability assessment to all but three of the reliability entities involved in the Interchange.	Prior to the expiration of the time period defined in the Timing Table, Column A, the Interchange Authority distributed the Arranged Interchange information for reliability assessment to all but four of the reliability entities involved in the Interchange.	Removed occurrences as directed by FERC.
Original R1.1	The Interchange Authority experienced one occurrence of not distributing information to all involved reliability entities.	The Interchange Authority experienced two occurrences of not distributing information to all involved reliability entities	The Interchange Authority experienced three occurrences of not distributing information to all involved reliability entities	The Interchange Authority experienced four occurrences of not distributing information to all involved reliability entities	
Revised R1.1	N/A	N/A	The Responsible Entity initiated a Curtailment to Confirmed or Implemented Interchange for reliability but the Interchange Authority failed to distribute the Arranged	The Responsible Entity initiated a Curtailment to Confirmed or Implemented Interchange for reliability but the Interchange Authority failed to distribute the Arranged	Removed occurrences as directed by FERC.

Standard Number INT-005-24 Interchange Authority Distributes Arranged Interchange					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
			Interchange information to the Source Balancing Authority or the Sink Balancing Authority.	Interchange information to the Source Balancing Authority and the Sink Balancing Authority.	

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Standard Number INT-006-24 Response to Interchange Authority					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1	The Responsible Entity failed on one occasion to respond to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.	The Responsible Entity failed on two occasions to respond to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.	The Responsible Entity failed on three occasions to respond to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.	The Responsible Entity failed on four occasions to respond to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange.	
Revised R1	N/A	<u>The responsible entity responded to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange but it failed to evaluate one of the subrequirements R1.1.1, R1.1.2 or R1.1.3.</u> <del>N/A</del>	<u>The responsible entity responded to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange but in evaluating the Arranged Interchange, it failed to evaluate two of the subrequirements R1.1.1, R1.1.2 or R1.1.3;</u>  <u>OR</u> <u>The responsible entity confirmed that the transmission service arrangements associated with the Arranged Interchange, had adjacent Transmission Service Provider connectivity, and were valid but failed to</u>	<u>The responsible entity failed to respond to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange and was deficient in one of the following:-</u>  <u>The responsible entity failed to evaluate arranged interchange with respect to all of the subrequirements R1.1.1, R1.1.2 and R1.1.3.</u>  <u>OR</u> <u>The responsible entity failed to confirm that the transmission service arrangements associated</u>	<u>Removed occurrences as directed by FERC.</u>  <u>The use of roll-up was applied.</u>

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Standard Number INT-006-24 Response to Interchange Authority					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
			<a href="#">confirm that the prevailing transmission system limits would not be violated.</a> <del>(R1.2)</del> N/A	<a href="#">with the Arranged Interchange had adjacent Transmission Service Provider connectivity, were valid and prevailing transmission system limits would not be violated</a> <del>(R1.2).</del>	
Original R1.1	The Balancing Authority failed to evaluate arranged interchange with respect to one of the requirements in the 3 sub-components .	N/A	The Balancing Authority failed to evaluate arranged interchange with respect to two of the requirements in the 3 sub-components .	The Balancing Authority failed to evaluate arranged interchange with respect to three of the requirements in the 3 sub-components .	
Revised R1.1	N/A	<del>The Responsible Entity evaluated the arranged interchange but failed to evaluate one of the subrequirements R1.1.1, R1.1.2 or R1.1.3.</del> N/A	<del>The Responsible Entity evaluated the arranged Interchange but failed to evaluate two of the subrequirements R1.1.1, R1.1.2 or R1.1.3.</del> N/A	<del>The Responsible Entity failed to evaluate arranged interchange with respect to all of the subrequirements R1.1.1, R1.1.2 and R1.1.3.</del> N/A	<del>Clarified language and rolled up sub-subrequirements into the subrequirement.</del> <a href="#">Rolled up into R1.</a>
Original R1.1.1	The Balancing Authority failed to evaluate Energy profile (ability to support the magnitude of the Interchange).	N/A	N/A	N/A	
Revised R1.1.1	N/A	N/A	N/A	N/A	<del>Rolled up into R1.1.</del> <a href="#">Rolled up into R1.</a>
Original R1.1.2	The Balancing Authority failed to evaluate Ramp (ability of generation	N/A	N/A	N/A	

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Standard Number INT-006-24 Response to Interchange Authority					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
	maneuverability to accommodate).				
Revised R1.1.2	N/A	N/A	N/A	N/A	<del>Rolled up into R1.1.</del> Rolled up into R1.
Original R1.1.3	The Balancing Authority failed to evaluate Scheduling path (proper connectivity of Adjacent Balancing Authorities).	N/A	N/A	N/A	
Revised R1.1.3	N/A	N/A	N/A	N/A	<del>Rolled up into R1.1.</del> Rolled up into R1.
Original R1.2	The Transmission Service Provider experienced one instance of failing to confirm that the transmission service arrangements associated with the Arranged Interchange had adjacent Transmission Service Provider connectivity, were valid and prevailing transmission system limits would not be violated.	The Transmission Service Provider experienced two instances of failing to confirm that the transmission service arrangements associated with the Arranged Interchange had adjacent Transmission Service Provider connectivity, were valid and prevailing transmission system limits would not be violated.	The Transmission Service Provider experienced three instances of failing to confirm that the transmission service arrangements associated with the Arranged Interchange had adjacent Transmission Service Provider connectivity, were valid and prevailing transmission system limits would not be violated.	The Transmission Service Provider experienced four or more instances of failing to confirm that the transmission service arrangements associated with the Arranged Interchange had adjacent Transmission Service Provider connectivity, were valid and prevailing transmission system limits would not be violated.	
Revised R1.2	N/A	N/A	<del>The Responsible Entity confirmed that the transmission service arrangements associated</del>	<del>The Responsible Entity failed to confirm that the transmission service arrangements associated</del>	Removed occurrences as directed by FERC.

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Standard Number INT-006-21 Response to Interchange Authority					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
			<del>with the Arranged Interchange, had adjacent Transmission Service Provider connectivity, and were valid but failed to confirm that the prevailing transmission system limits would not be violated.</del> <a href="#">N/A</a>	<del>with the Arranged Interchange had adjacent Transmission Service Provider connectivity, were valid and prevailing transmission system limits would not be violated</del> <a href="#">N/A</a> .	<a href="#">Rolled up into R1</a>

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Standard Number INT-007-1 Interchange Confirmation					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1	The Interchange Authority failed to verify one time, as indicated in R1.1, R1.2, R1.3, R1.3.1, R1.3.2, R1.3.3, or R1.3.4 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify two times, as indicated in R1.1, R1.2, R1.3, R1.3.1, R1.3.2, R1.3.3, or R1.3.4 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify three times, as indicated in R1.1, R1.2, R1.3, R1.3.1, R1.3.2, R1.3.3, or R1.3.4 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify four times, as indicated in R1.1, R1.2, R1.3, R1.3.1, R1.3.2, R1.3.3, or R1.3.4 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	
Revised R1	The Responsible Entity failed to verify one of the sub-requirements (R1.1, R1.2, R1.3, R1.3.1, R1.3.2, R1.3.3, or R1.3.4) prior to transitioning an Arranged Interchange to a Confirmed Interchange.	The Responsible Entity failed to verify two of the sub-requirements (R1.1, R1.2, R1.3, R1.3.1, R1.3.2, R1.3.3, or R1.3.4) prior to transitioning an Arranged Interchange to a Confirmed Interchange.	The Responsible Entity failed to verify three of the sub-requirements (R1.1, R1.2, R1.3, R1.3.1, R1.3.2, R1.3.3, or R1.3.4) prior to transitioning an Arranged Interchange to a Confirmed Interchange.	The Responsible Entity but failed to verify four or more of the sub-requirements (R1.1, R1.2, R1.3, R1.3.1, R1.3.2, R1.3.3, or R1.3.4) prior to transitioning an Arranged Interchange to a Confirmed Interchange.	Removed occurrences as directed by FERC and rolled up subrequirements into the primary requirement.
Original R1.1	The Interchange Authority failed to verify one time, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify two times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify three times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify four times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	
Revised R1.1	N/A	N/A	N/A	N/A	Rolled up into R1.

Standard Number INT-007-1 Interchange Confirmation					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1.2	The Interchange Authority failed to verify one time, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify two times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify three times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify four times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	
Revised R1.2	N/A	N/A	N/A	N/A	Rolled up into R1.
Original R1.3	The Interchange Authority failed to verify one time, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify two times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify three times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify four times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	
Revised R1.3	N/A	N/A	N/A	N/A	Rolled up into R1.
Original R1.3.1	The Interchange Authority failed to verify one time, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify two times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify three times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify four times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	

Standard Number INT-007-1 Interchange Confirmation					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Revised R1.3.1	N/A	N/A	N/A	N/A	Rolled up into R1.
Original R1.3.2	The Interchange Authority failed to verify one time, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify two times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify three times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify four times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	
Revised R1.3.2	N/A	N/A	N/A	N/A	Rolled up into R1.
Original R1.3.3	The Interchange Authority failed to verify one time, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify two times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify three times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	The Interchange Authority failed to verify four times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged Interchange to Confirmed Interchange.	
Revised R1.3.3	N/A	N/A	N/A	N/A	Rolled up into R1.
Original R1.3.4	The Interchange Authority failed to verify one time, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged	The Interchange Authority failed to verify two times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged	The Interchange Authority failed to verify three times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged	The Interchange Authority failed to verify four times, as indicated in R1 that Arranged Interchange was balanced and valid prior to transitioning Arranged	

Proposed Violation Severity Levels for the INT, PER, NUC Series of Standards

Standard Number INT-007-1 Interchange Confirmation					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
	Interchange to Confirmed Interchange.	Interchange to Confirmed Interchange.	Interchange to Confirmed Interchange.	Interchange to Confirmed Interchange.	
Revised R1.3.4	N/A	N/A	N/A	N/A	Rolled up into R1.
Original R1.4	Each Balancing Authority and Transmission Service Provider that received the Arranged Interchange information from the Interchange Authority for reliability assessment has provided approval, with minor exception and is substantially compliant with the directives of the requirement.	Each Balancing Authority and Transmission Service Provider that received the Arranged Interchange information from the Interchange Authority for reliability assessment has provided approval, with some exception and is mostly compliant with the directives of the requirement.	Each Balancing Authority and Transmission Service Provider that received the Arranged Interchange information from the Interchange Authority for reliability assessment has provided approval but was substantially deficient in meeting the directives of the requirement.	Each Balancing Authority and Transmission Service Provider that received the Arranged Interchange information from the Interchange Authority for reliability assessment did not provide approval and failed to meet the requirement.	
Revised R1.4	N/A	N/A	N/A	The Responsible Entity received Arranged Interchange information from the Interchange Authority for reliability assessment and failed to provide approval.	Removed exceptions and made binary

Standard Number INT-008-21 Interchange Authority Distributes Status					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1	The Interchange Authority experienced one occurrence of not distributing information to all involved reliability entities as delineated in R1.1, R1.1.1 or R1.1.2.	The Interchange Authority experienced two occurrences of not distributing information to all involved reliability entities.	The Interchange Authority experienced three occurrences of not distributing information to all involved reliability entities.	The Interchange Authority experienced four occurrences of not distributing information to all involved reliability entities or no evidence provided.	
Revised R1	The <del>Responsible</del> <u>responsible</u> <del>e</del> Entity distributed the Arranged Interchange to all Balancing Authorities (including Balancing Authorities on both sides of a direct current tie), Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange but did not include one of the elements required in sub-requirements R.1.1.1 or R.1.1.2 for a Confirmed Interchange.	The <del>Responsible</del> <u>responsible</u> <del>Entity-entity</del> distributed the Arranged Interchange to all Balancing Authorities (including Balancing Authorities on both sides of a direct current tie), Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange but did not include two of the elements required in sub-requirements R.1.1.1 or R.1.1.2 for a Confirmed Interchange.  OR  The <del>Responsible</del> <u>responsible</u> <del>Entity-entity</del> distributed the Arranged	The <del>Responsible</del> <u>responsible</u> <del>Entity-entity</del> distributed the Arranged Interchange to all but two of the Balancing Authorities (including Balancing Authorities on both sides of a direct current tie), Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange.	The <del>Responsible</del> <u>responsible</u> <del>Entity-entity</del> distributed the Arranged Interchange to all but three or more of the Balancing Authorities (including Balancing Authorities on both sides of a direct current tie), Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange.  OR  The <del>Responsible</del> <u>responsible</u> entity did not distribute the Arranged Interchange.	Rolled-up sub-requirements into the primary requirement and removed occurrences  <u>Removed capitalization from "Responsible Entity"</u>

Standard Number INT-008-21 Interchange Authority Distributes Status					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
		Interchange to all but one of the Balancing Authorities (including Balancing Authorities on both sides of a direct current tie), Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange.			
Original R1.1	The Interchange Authority experienced one occurrence of not distributing information to all involved reliability entities as defined in R1.	The Interchange Authority experienced two occurrences of not distributing information to all involved reliability entities as defined in R1.	The Interchange Authority experienced three occurrences of not distributing information to all involved reliability entities as defined in R1.	The Interchange Authority experienced four occurrences of not distributing information to all involved reliability entities as defined in R1 or no evidence provided.	
Revised R1.1	N/A	N/A	N/A	N/A	Rolled up into R1.
Original R1.1.1	The Interchange Authority experienced one occurrence of not distributing information to all involved reliability entities as defined in R1.	The Interchange Authority experienced two occurrences of not distributing information to all involved reliability entities as defined in R1.	The Interchange Authority experienced three occurrences of not distributing information to all involved reliability entities as defined in R1.	The Interchange Authority experienced four occurrences of not distributing information to all involved reliability entities as defined in R1 or no evidence provided.	
Revised R1.1.1	N/A	N/A	N/A	N/A	Rolled up into R1.

Standard Number INT-008-21 Interchange Authority Distributes Status					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1.1.1	The Interchange Authority experienced one occurrence of not distributing information to all involved reliability entities as defined in R1.	The Interchange Authority experienced two occurrences of not distributing information to all involved reliability entities as defined in R1.	The Interchange Authority experienced three occurrences of not distributing information to all involved reliability entities as defined in R1.	The Interchange Authority experienced four occurrences of not distributing information to all involved reliability entities as defined in R1 or no evidence provided.	
Revised R1.1.1	N/A	N/A	N/A	N/A	Rolled up into R1.

Proposed Violation Severity Levels for the INT, PER, NUC Series of Standards

Standard Number INT-009-1 Implementation of Interchange					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1	The Balancing Authority experienced one occurrence of not implementing a Confirmed Interchange as received from the Interchange Authority.	The Balancing Authority experienced two occurrences of not implementing a Confirmed Interchange as received from the Interchange Authority.	The Balancing Authority experienced three occurrences of not implementing a Confirmed Interchange as received from the Interchange Authority.	The Balancing Authority experienced four occurrences of not implementing a Confirmed Interchange as received from the Interchange Authority.	
Revised R1	N/A	N/A	N/A	The <del>Responsible</del> <u>responsible Entity</u> failed to implement a Confirmed Interchange as received from the Interchange Authority.	Removed occurrences and made binary. <u>Removed capitalization from “Responsible Entity.”</u>

Standard Number INT-010-1 Interchange Coordination Exemptions					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1	The Balancing Authority that experienced a loss of resource covered by an energy sharing agreement failed one time to submit a request for an Arranged Interchange within the specified time period.	The Balancing Authority that experienced a loss of resource covered by an energy sharing agreement failed two times to submit a request for an Arranged Interchange within the specified time period.	The Balancing Authority that experienced a loss of resource covered by an energy sharing agreement failed three times to submit a request for an Arranged Interchange within the specified time period.	The Balancing Authority that experienced a loss of resource covered by an energy sharing agreement failed four or more times to submit a request for an Arranged Interchange within the specified time period.	
Revised R1	The <del>Responsible Entity</del> <u>responsible entity</u> that experienced a loss of resources that exceeded 60 minutes and was covered by an energy sharing agreement ensured that a request for an Arranged Interchange was submitted, but with a start time that was more than 60 minutes but less than 75 minutes beyond the resource loss.	The <del>Responsible Entity</del> <u>responsible Entity</u> that experienced a loss of resources that exceeded 60 minutes and was covered by an energy sharing agreement ensured that a request for an Arranged Interchange was submitted, but with a start time that was 75 minutes or more, but less than 90 minutes beyond the resource loss.	The <del>Responsible Entity</del> <u>responsible Entity</u> that experienced a loss of resources that exceeded 60 minutes and was covered by an energy sharing agreement ensured that a request for an Arranged Interchange was submitted, but with a start time that was 90 minutes or more, but less than 105 minutes beyond the resource loss.	The <del>Responsible Entity</del> <u>responsible Entity</u> that experienced a loss of resources that exceeded 60 minutes and was covered by an energy sharing agreement ensured that a request for an Arranged Interchange was submitted, but with a start time that was more than 105 minutes beyond the resource loss.  OR  The <del>Responsible Entity</del> <u>responsible Entity</u> that experienced a loss of resources that exceeded 60 minutes and was covered by an energy sharing	Removed number of events and based VSL on minutes in excess of 60.  <u>Removed capitalization from "Responsible Entity"</u>

Standard Number INT-010-1 Interchange Coordination Exemptions					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
				agreement, failed to ensure that a request for an Arranged Interchange was submitted.	
Original R2	The Reliability Coordinator failed one time to direct the submittal of a new or modified Arranged Interchange; or the Balancing Authority failed one time to submit the modified schedule as directed.	The Reliability Coordinator failed two times to direct the submittal of a new or modified Arranged Interchange; or the Balancing Authority failed two times to submit the modified schedule as directed.	The Reliability Coordinator failed three times to direct the submittal of a new or modified Arranged Interchange; or the Balancing Authority failed three times to submit the modified schedule as directed.	The Reliability Coordinator failed four times to direct the submittal of a new or modified Arranged Interchange; or the Balancing Authority failed four times to submit the modified schedule as directed.	
Revised R2	N/A	N/A	N/A	The <del>Responsibility</del> <del>responsibility Entity</del> <del>entity</del> failed to direct a Balancing Authority to submit the modified Arranged Interchange reflecting that modification within 60 minutes of the initiation of the event.	Made binary to elimination occurrences. <u>Removed capitalization from "Responsible Entity."</u>
Original R3	The Reliability Coordinator failed one time to direct the submittal of a new or modified Arranged Interchange ; or the Balancing Authority	The Reliability Coordinator failed two times to direct the submittal of a new or modified Arranged Interchange ; or the Balancing Authority failed two times to submit a	The Reliability Coordinator failed three times to direct the submittal of a new or modified Arranged Interchange ; or the Balancing Authority failed three times to submit a	The Reliability Coordinator failed four times to direct the submittal of a new or modified Arranged Interchange ; or the Balancing Authority failed four times or more to	

Standard Number INT-010-1 Interchange Coordination Exemptions					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
	failed one time to submit a schedule as directed.	schedule as directed.	schedule as directed.	submit a schedule as directed.	
Revised R3	N/A	N/A	N/A	The <del>Responsibility Entity</del> <u>responsibility Entity</u> failed to direct a Balancing Authority to submit an Arranged Interchange reflecting the new Interchange schedule within 60 minutes of the initiation of the event.	Made binary to elimination occurrences. <u>Removed capitalization from "Responsible Entity."</u>

Standard Number PER-001-0 Operating Personnel Responsibility and Authority					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1	N/A	N/A	The Transmission Operator and Balancing Authority has failed to demonstrate the communication to the operating personnel their responsibility OR their authority to implement real-time actions to ensure a stable and reliable operation of the Bulk Electric System.	The Transmission Operator and Balancing Authority has failed to demonstrate the communication to the operating personnel their responsibility AND authority to implement real-time actions to ensure a stable and reliable operation of the Bulk Electric System.	
Revised R1	N/A	N/A	The Transmission Operator or Balancing Authority failed to demonstrate that it communicated to its operating personnel their responsibility or their authority to implement real-time actions to ensure the stable and reliable operation of the Bulk Electric System.	The Transmission Operator or Balancing Authority failed to demonstrate that it communicated to its operating personnel their responsibility and authority to implement real-time actions to ensure the stable and reliable operation of the Bulk Electric System.	Corrected grammar.

Proposed Violation Severity Levels for the INT, PER, NUC Series of Standards

Standard Number PER-002-0 Operating Personnel Training					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1	The Transmission Operator and Balancing Authority has produced the training records for the training completed for more than 75% but less than 100% of their operating personnel.	The Transmission Operator and Balancing Authority has produced the training records for the training completed for more than 50% but less than or equal to 75% of their operating personnel.	The Transmission Operator and Balancing Authority has produced the training records for the training completed for more than 25% but less than or equal to 50% of their operating personnel.	The Transmission Operator and Balancing Authority has produced the training records for the training completed for more than or equal to 0% but less than or equal to 25% of their operating personnel.	
Revised R1	<del>The responsible entity is staffed with 90% or more, but less than 100% failed to staff 5% or less with adequately trained operating personnel.</del>	<del>The responsible entity is staffed with 80% or more but less than 90% failed to staff more than 5% up to (and including) 10% with adequately trained operating personnel.</del>	<del>The responsible entity is staffed with 70% or more but less than 80% failed to staff more than 10% up to (and including) 15% with adequately trained operating personnel.</del>	<del>The responsible entity is staffed with less than 70% failed to staff more than 15% with adequately trained operating personnel.</del>	Revised to make consistent with the requirement and removed the quartile approach. <a href="#">Modified for consistency between standards.</a>
Original R2	Each Transmission Operator and Balancing Authority has produced the training program for more than 75% but less than 100% of their real-time operating personnel.	Each Transmission Operator and Balancing Authority has produced the training program for more than 50% but less than or equal to 75% of their real-time operating personnel.	Each Transmission Operator and Balancing Authority has produced the training program for more than 25% but less than or equal to 50% of their real-time operating personnel.	Each Transmission Operator and Balancing Authority has produced the training program for more than or equal to 0% but less than or equal to 25% of their real-time operating personnel.	
Revised R2	<del>The responsible entity did not train operating personnel for positions described in R2.1 or R2.2, affecting 5% or less of its operating personnel.</del>	<del>The responsible entity did not train operating personnel for positions described in R2.1 or R2.2, affecting more than 5% up to (and including) 10% between 5%—10% of</del>	<del>The responsible entity did not train operating personnel for positions described in R2.1 or R2.2, affecting more than 10% up to (and including) 15% 10%—15%, inclusive, of its</del>	<del>The responsible entity did not train operating personnel for positions described in R2.1 or R2.2, affecting more than 15% of its operating personnel.</del>	Made FERC Requested changes. Rolled up subrequirements into the primary requirement. <a href="#">Modified % language for</a>

Standard Number PER-002-0 Operating Personnel Training					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
		its operating personnel.	operating personnel.		<a href="#">consistency between standards.</a>
Original R2.1	N/A	N/A	The Transmission Operator and Balancing Authority failed to produce training program for their operating personnel.	N/A	
Revised R2.1	N/A	N/A	NA	N/A	Rolled up into R2.
Original R2.2	N/A	N/A	The Transmission Operator and Balancing Authority failed to produce training program for positions directly responsible for complying with NERC Standards.	N/A	
Revised R2.2	N/A	N/A	N/A	N/A	Rolled up into R2.
Original R3	Each Transmission Operator and Balancing Authority failed to comply with one of the provisions specified in R3.1, 3.2, 3.3, or 3.4.	Each Transmission Operator and Balancing Authority failed to comply with two of the provisions specified in R3.1, 3.2, 3.3, or 3.4.	Each Transmission Operator and Balancing Authority failed to comply with three of the provisions specified in R3.1, 3.2, 3.3, or 3.4.	Each Transmission Operator and Balancing Authority failed to comply with all 4 of the provisions specified in R3.1, 3.2, 3.3, or 3.4.	
Revised R3	The Responsible <del>responsible Entity-entity</del> did not comply with one	The Responsible <del>responsible Entity-entity</del> did not comply with two of	The Responsible <del>responsible Entity-entity</del> did not comply with three	The Responsible <del>responsible Entity-entity</del> did not comply with any of	FERC requested specific changes and this alternate proposed language clarified

Standard Number PER-002-0 Operating Personnel Training					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
	of the following subrequirements: R3.1, R3.2, R3.3, or R3.4.	the following subrequirements: R3.1, R3.2, R3.3, or R3.4.	of the following subrequirements: R3.1, R3.2, R3.3, or R3.4.	the following subrequirements: R3.1, R3.2, R3.3, and R3.4.	FERC's intent. Rolled up subrequirements into the primary requirement. <a href="#">Removed capitalization from "Responsible Entity."</a>
Original R3.1	The responsible entity's training program objectives were incomplete (e.g. The responsible entity failed to define training program objectives for less than 25% of the applicable BA and TOP NERC and Regional Reliability Organizations standards, entity operating procedures, and regulatory requirements.)	The responsible entity's training program objectives were incomplete (e.g. The responsible entity failed to define training program objectives for 25% or more but less than 50% of the applicable BA & TOP NERC and Regional Reliability Organizations standards, entity operating procedures, and regulatory requirements.)	The responsible entity's training program objectives were incomplete (e.g. The responsible entity failed to define training program objectives for 50% or more but less than 75% of the applicable BA & TOP NERC and Regional Reliability Organizations standards, entity operating procedures, and regulatory requirements.)	The responsible entity's training program objectives were incomplete (e.g. The responsible entity failed to define training program objectives for 75% or more of the applicable BA & TOP NERC and Regional Reliability Organizations standards, entity operating procedures, and regulatory requirements.)	
Revised R3.1	N/A	N/A	N/A	N/A	Rolled up into R3.
Original R3.2	The responsible entity does not have a plan for continuing training of operating personnel. OR The responsible entity does not have a plan for initial training of operating personnel.	The responsible entity does not have a plan for continuing training of operating personnel. OR The responsible entity does not have a plan for initial training of operating personnel.	The responsible entity does not have a plan for continuing training of operating personnel. AND The responsible entity does not have a plan for initial training of operating personnel.	The responsible entity does not have a plan for continuing training of operating personnel. AND The responsible entity does not have a plan for initial training of operating personnel.	

Standard Number PER-002-0 Operating Personnel Training					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
	OR The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.	AND The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.	OR The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.	AND The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.	
Revised R3.2	N/A	N/A	N/A	N/A	Rolled up into R3.
Original R3.3	The responsible entity has produced the training program with more than 75% but less than 100% of operating personnel provided with training time.	The responsible entity has produced the training program with more than 50% but less than or equal to 75% of operating personnel provided with training time.	The responsible entity has produced the training program with more than 25% but less than or equal to 50% of operating personnel provided with training time.	The responsible entity has produced the training program with more than or equal to 0% but less than or equal to 25% of operating personnel provided with training time.	
Revised R3.3	N/A	N/A	N/A	N/A	Rolled up into R3.
Original R3.4	N/A	The responsible entity has produced the training program with training staff identified that lacks knowledge of system operations. OR The responsible entity has produced the training program with training staff identified that lacks instructional capabilities.	The responsible entity has produced the training program with training staff identified that lacks knowledge of system operations. AND The responsible entity has produced the training program with training staff identified that lacks instructional capabilities.	The responsible entity has produced the training program with no training staff identified.	

Standard Number PER-002-0 Operating Personnel Training					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Revised R3.4	N/A	N/A	N/A	N/A	Rolled up into R3.
Original R4	For personnel identified in Requirement R2, the responsible entity provided at least 4 (but less than 5) days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.	For personnel identified in Requirement R2, the responsible entity provided at least 3 (but less than 4) days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel..	For personnel identified in Requirement R2, the responsible entity provided at least 2 (but less than 3) days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.	For personnel identified in Requirement R2, the responsible entity provided less than 2 days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.	
Revised R4	The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting 5% or less of its operating personnel.	The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting <u>more than 5% up to (and including) 10%</u> <del>between 5%—10%</del> of its operating personnel.	The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting <u>more than 10% up to (and including) 15%</u> <del>10%—15%, inclusive,</del> of its operating personnel.	The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting more than 15% of its operating personnel.	Made FERC requested changes. <a href="#">Modified % language for consistency between standards.</a>

Proposed Violation Severity Levels for the INT, PER, NUC Series of Standards

Standard Number PER-003-0 Operating Personnel Credentials					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 0 hours and less 12 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 12 hours and less 36 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 36 hours and less 72 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 72 hours for any operating position for a calendar month.	
Revised R1	NA	NA	NA	The responsible entity did not staff all of its operating positions <u>with personnel that are NERC-certified as required by</u> <del>meet both of the</del> <u>criteria described in R1.1 and R1.2 with personnel that are NERC-certified for the applicable functions.</u>	Revised to remove the calendar month period since it not in the requirement. Made binary. Rolled up subrequirements into the primary requirement. <a href="#">Modified language for improved clarity.</a>
Original R1.1	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 0 hours and less 12 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 12 hours and less 36 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 36 hours and less 72 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 72 hours for any operating position for a calendar month.	
Revised R1.1	N/A	N/A	N/A	N/A	Rolled up into R1.

Proposed Violation Severity Levels for the INT, PER, NUC Series of Standards

Standard Number PER-003-0 Operating Personnel Credentials					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1.2	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 0 hours and less 12 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 12 hours and less 36 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 36 hours and less 72 hours for any operating position for a calendar month.	The responsible entity failed to staff an operating position with NERC certified personnel for greater than 72 hours for any operating position for a calendar month.	
Revised R1.2	N/A	N/A	N/A	N/A	Rolled up into R1

Proposed Violation Severity Levels for the INT, PER, NUC Series of Standards

Standard Number PER-004-1 Reliability Coordination - Staffing					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1	N/A	N/A	N/A	The responsible entity has failed to be staffed with adequately trained and NERC-certified Reliability Coordinator operators, 24 hours per day, seven days per week.	
Revised R1	N/A	N/A	N/A	The responsible entity has failed to be staffed with adequately trained and NERC-certified Reliability Coordinator operators, 24 hours per day, seven days per week.	No changes.
Original R2	The Reliability Coordinator's operating personnel completed at least 4 (but less than 5) days of emergency training.	The Reliability Coordinator's operating personnel completed at least 3 (but less than 4) days of emergency training.	The Reliability Coordinator's operating personnel completed at least 2 (but less than 3) days of emergency training.	The Reliability Coordinator's operating personnel completed less than 2 days of emergency training.	
Revised R2	The responsible entity did not provide five days per year of <del>emergency</del> training and drills, as directed by the requirement, affecting 5% or less of its operating personnel.	The responsible entity did not provide five days per year of <del>emergency</del> training and drills, as directed by the requirement, <del>more than 5% up to (and including) 10%</del> affecting <del>between 5%—10%</del> of its operating personnel.	The responsible entity did not provide five days per year of <del>emergency</del> training and drills, as directed by the requirement, affecting <del>more than 10% up to (and including) 15%</del> <del>10%—15%</del> , <del>inclusive</del> , of its operating personnel.	The responsible entity did not provide five days per year of <del>emergency</del> training and drills, as directed by the requirement, affecting <del>greater</del> <del>more</del> than 15% of its operating personnel.	Changes made to be consistent with PER-002 R4 and FERC directed language. <a href="#">Modified language for improved clarity.</a> <a href="#">Modified % language for consistency between standards.</a>

Proposed Violation Severity Levels for the INT, PER, NUC Series of Standards

Standard Number PER-004-1 Reliability Coordination - Staffing					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R3	Reliability Coordinator personnel have a comprehensive understanding of the interactions with at least 75% and less than 100% of neighboring Reliability Coordinator areas.	Reliability Coordinator personnel have a comprehensive understanding of the interactions with 50% or more and less than 75% of neighboring Reliability Coordinator areas.	Reliability Coordinator personnel have a comprehensive understanding of the interactions with 25% or more and less than 50% of neighboring Reliability Coordinator areas.	Reliability Coordinator personnel have a comprehensive understanding of the interactions less than 25% of neighboring Reliability Coordinator areas.	
Revised R3	<del>5% or less</del> <del>Less than 5%</del> of the Reliability Coordinator operating personnel did not have a comprehensive understanding of the Reliability Coordinator Area and interactions with neighboring Reliability Coordinator Areas.	<del>More than 5% up to (and including) 10%</del> <del>5% or more, but less than 10%</del> of the Reliability Coordinator operating personnel did not have a comprehensive understanding of the Reliability Coordinator Area and interactions with neighboring Reliability Coordinator Areas.	<del>More than 10% up to (and including) 15%</del> <del>10% or more but less than 15%</del> of the Reliability Coordinator operating personnel did not have a comprehensive understanding of the Reliability Coordinator Area and interactions with neighboring Reliability Coordinator Areas.	<del>More than 15%</del> <del>15% or more</del> of the Reliability Coordinator operating personnel did not have a comprehensive understanding of the Reliability Coordinator Area and interactions with neighboring Reliability Coordinator Areas.	Changes made to be consistent and technically appropriate with the requirement. (FERC guideline #3). Changed percentages to FERC directed range. <a href="#">Modified % language for consistency between standards.</a>
Original R4	Reliability Coordinator operating personnel have an extensive understanding of the operations of more than 75% and less than 100% of all Balancing Authorities, Transmission	Reliability Coordinator operating personnel have an extensive understanding of the operations of more than 50% and less than 75% of all Balancing Authorities, Transmission Operators and Generator	Reliability Coordinator operating personnel have an extensive understanding of the operations of more than 25% and less than 50% of all Balancing Authorities, Transmission Operators and Generator	Reliability Coordinator operating personnel have an extensive understanding of the operations of less than 25% of all Balancing Authorities, Transmission Operators and Generator Operators in the Reliability	

Proposed Violation Severity Levels for the INT, PER, NUC Series of Standards

Standard Number PER-004-1 Reliability Coordination - Staffing					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
	Operators and Generator Operators in the Reliability Coordinator Area.	Operators in the Reliability Coordinator Area.	Operators in the Reliability Coordinator Area.	Coordinator Area.	
Revised R4	<del>5% or less Less than 5%</del> of the Reliability Coordinator operating personnel did not have an extensive understanding of the Balancing Authorities, Transmission Operators, and Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions.	<del>More than 5% up to (and including) 10% 5% or more, but less than 10%</del> of the Reliability Coordinator operating personnel did not have an extensive understanding of the Balancing Authorities, Transmission Operators, and Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions.	<del>More than 10% up to (and including) 15% 10% or more, but less than 15%</del> of the Reliability Coordinator operating personnel did not have an extensive understanding of the Balancing Authorities, Transmission Operators, and Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions.	<del>More than 15% 15% or more</del> of the Reliability Coordinator operating personnel did not have an extensive understanding of the Balancing Authorities, Transmission Operators, and Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions.	Changes made to be consistent and technically appropriate with the requirement. (FERC guideline #3). Changed percentages to FERC directed range. <a href="#">Modified % language for consistency between standards.</a>
Original R5	Reliability Coordinator has failed to provide its operating personnel with less than 25% of the SOL and IROL limits and for inter-tie facility limits OR the protocols to ensure	Reliability Coordinator has failed to provide its operating personnel with 25% or more and less than 50% of the SOL and IROL limits and for inter-tie facility limits.	Reliability Coordinator has failed to provide its operating personnel with 50% or more and less than 75% of the SOL and IROL limits and for inter-tie facility limits.	Reliability Coordinator has failed to provide its operating personnel with 75% or more of the SOL and IROL limits and for inter-tie facility limits.	

Standard Number PER-004-1 Reliability Coordination - Staffing					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
	best available data at all times is not in place.				
Revised R5	Reliability Coordinator operating personnel did not place particular attention on <u>5% or less</u> <del>less than 5%</del> of the SOLs or IROLs or inter-tie facility limits.	Reliability Coordinator operating personnel did not place particular attention on <u>more than 5% up to (and including) 10%</u> <del>5% but less than 10%</del> of the SOLs or IROLs or inter-tie facility limits.	Reliability Coordinator operating personnel did not place particular attention on <u>more than 10% up to (and including) 15%</u> <del>10% but less than 15%</del> of the SOLs or IROLs or inter-tie facility limits.	Reliability Coordinator operating personnel did not place particular attention on <u>more than 15%</u> <del>15% or more</del> of the SOLs or IROLs or inter-tie facility limits.  OR  The Reliability Coordinator did not ensure protocols are in place to allow Reliability Coordinator operating personnel to have the best available information at all times.	Revised to make consistent with the requirement and removed the quartile approach per FERC suggested language.  <u>Modified % language for consistency between standards.</u>

Standard Number NUC-001-0 Nuclear Plant Interface Coordination					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R1	The Nuclear Plant Generator Operator did not verify receipt of the proposed NPIR's.	The Nuclear Plant Generator Operator submitted an incomplete proposed NPIR to the applicable transmission entities.	The Nuclear Plant Generator Operator did not provide the proposed NPIR's to all the applicable entities.	The Nuclear Plant Generator Operator did not provide the proposed NPIR's to any applicable entities.	
Revised R1	The Nuclear Plant Generator Operator provided the NPIR's to the applicable entities but did not verify receipt of the proposed NPIR's.	The Nuclear Plant Generator Operator did not provide the proposed NPIR's to one of the applicable entities.	The Nuclear Plant Generator Operator did not provide the proposed NPIR's to two of the applicable entities.	The Nuclear Plant Generator Operator did not provide the proposed NPIR's to more than two of the applicable entities.	Eliminated ambiguous language <a href="#">Modified language for improved clarity and consistency.</a>
Original R2	N/A	N/A	N/A	The Nuclear Plant Generator Operator or the applicable Transmission Entity does not have in effect one or more agreements that include NPIR's and document the implementation of the NPIR's.	
Revised R2	N/A	N/A	N/A	The Nuclear Plant Generator Operator or the applicable Transmission Entity does not have in effect one or more agreements that include <a href="#">mutually agreed to</a> NPIR's and document the implementation of the	<del>No changes.</del> <a href="#">Added "mutually agreed to" for greater consistency to the requirement language.</a>

Standard Number NUC-001-0 Nuclear Plant Interface Coordination					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
				NPIRs.	
Original R3	The applicable Transmission Entity incorporated the NPIRs into its planning analyses and identified no areas of concern but it did not communicate these results to the Nuclear Plant Generator Operator.	The applicable Transmission Entity incorporated the NPIRs into its planning analyses and identified one or more areas of concern but did not communicate these results to the Nuclear Plant Generator Operator.	The applicable Transmission Entity did not incorporate the NPIRs into its planning analyses of the electric system.	N/A	
Revised R3	N/A	The responsible entity incorporated the NPIRs into its planning analyses but did not communicate the results to the Nuclear Plant Generator Operator.	N/A	The responsible entity did not incorporate the NPIRs into its planning analyses of the electric system.	Revised and assigned only 2 levels of VSLs.
Original R4	The applicable Transmission Entity failed to incorporate one or more applicable NPIRs into their operating analyses.	The applicable Transmission Entity failed to incorporate any NPIRs into their operating analyses OR did not inform NPG operator when their ability of assess the operation of the electric system affecting the NPIRs was lost.	The applicable Transmission Entity failed to operate the system to meet the NPIRs	N/A	

Proposed Violation Severity Levels for the INT, PER, NUC Series of Standards

Standard Number NUC-001-0 Nuclear Plant Interface Coordination					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Revised R4	N/A	N/A	The responsible entity did not comply with sub-requirement R4.3 but is compliant with subrequirements R4.1 and R4.2.	The responsible entity did not comply with one of the following subrequirements: R4.1 or R4.2.	Changes made to create a Severe VSL.
Original R5	The Nuclear Operator failed to operate the plant in accordance with one or more of the administrative or training elements within the agreements.	The Nuclear Operator failed to operate the plant in accordance with one or two of the technical, operations, maintenance or communication elements within the agreements.	The Nuclear Operator failed to operate the plant in accordance with three or more of the technical, operations, maintenance or communication elements within the agreements.	N/A	
Revised R5	N/A	N/A	N/A	The Nuclear Plant Generator Operator failed to operate per the Agreements developed in accordance with this standard.	Made this a Binary VSL
Original R6	The Nuclear Operator or Transmission Entity failed to coordinate outages or maintenance activities in accordance with one or more of the <u>administrative</u> elements within the agreements.	The Nuclear Operator or Transmission Entity failed to provide outage or maintenance <u>schedules</u> to the appropriate parties as described in the agreement or on a time period consistent with the agreements.	The Nuclear Operator or Transmission Entity failed to coordinate one or more outages or maintenance activities in accordance the requirements of the agreements.	N/A	

Standard Number NUC-001-0 Nuclear Plant Interface Coordination					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Revised R6	N/A	N/A	N/A	The responsible entity failed to coordinate an outage or maintenance activity which affected an NPIR.	Made this a Binary VSL
Original R7	The Nuclear Plant Generator Operator did not inform the applicable Transmission Entities of <u>proposed</u> changes to nuclear plant design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs.	The Nuclear Plant Generator Operator did not inform the applicable Transmission Entities of <u>actual</u> changes to nuclear plant design, configuration, operations, limits, protection systems, or capabilities that <u>may</u> impact the ability of the electric system to meet the NPIRs.	The Nuclear Plant Generator Operator did not inform the applicable Transmission Entities of <u>actual</u> changes to nuclear plant design, configuration, operations, limits, protection systems, or capabilities that <u>directly impact</u> the ability of the electric system to meet the NPIRs.	N/A	
Revised R7	N/A	The Nuclear Plant Generator Operator did not inform the applicable Transmission Entities of a <u>proposed</u> change to nuclear plant design, configuration, operations, limits, protection systems, or capabilities that may <del>have impacted</del> the ability of the electric system to meet the NPIRs.	N/A	The Nuclear Plant Generator Operator did not inform the applicable Transmission Entities of an <u>actual</u> change to nuclear plant design, configuration, operations, limits, protection systems, or capabilities that <del>directly</del> <u>may impacted</u> the ability of the electric system to meet the NPIRs.	Revised to 2 levels of VSL moving High to Severe <a href="#">Modified language for greater clarity and consistency with the requirement.</a>

Standard Number NUC-001-0 Nuclear Plant Interface Coordination					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
Original R8	The applicable Transmission Entities did not inform the Nuclear Plant Generator Operator of <u>proposed</u> changes to transmission system design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs.	The applicable Transmission Entities did not inform the Nuclear Plant Generator Operator of <u>actual</u> changes to transmission system design, configuration, operations, limits, protection systems, or capabilities that <u>may</u> impact the ability of the electric system to meet the NPIRs.	The applicable Transmission Entities did not inform the Nuclear Plant Generator Operator of <u>actual</u> changes to transmission system design, configuration, operations, limits, protection systems, or capabilities that <u>directly impacts</u> the ability of the electric system to meet the NPIRs.	N/A	
Revised R8	N/A	<del>The applicable Transmission Entity responsible entity did not inform the Nuclear Plant Generator Operator of a proposed change to transmission system design, configuration, operations, limits, protection systems, or capabilities that may have impacted the ability of the electric system to meet the NPIRs.</del>	N/A	<del>The applicable Transmission Entity responsible entity did not inform the Nuclear Plant Generator Operator of an actual change to transmission system design, configuration, operations, limits, protection systems, or capabilities that directly may impacted the ability of the electric system to meet the NPIRs.</del>	Revised to 2 levels of VSL, moved High to Severe <u>Modified language for greater clarity and consistency with the requirement.</u>
Original R9	The agreement identified in R2. between the Nuclear Plant Generator Operator and the	The agreement identified in R2. between the Nuclear Plant Generator Operator and the applicable	The agreement identified in R2. between the Nuclear Plant Generator Operator and the applicable	The agreement identified in R2. between the Nuclear Plant Generator Operator and the applicable	

Standard Number NUC-001-0 Nuclear Plant Interface Coordination					
R#	Lower VSL	Moderate VSL	High VSL	Severe VSL	Explanation of Change
	applicable Transmission Entities is missing one or more sub-components of R9.1.	Transmission Entities is missing from one to five of the combined sub-components in R9.2, R9.3 and R9.4.	Transmission Entities is missing from six to ten of the combined sub-components in R9.2, R9.3 and R9.4.	Transmission Entities is missing eleven or more of the combined sub-components in R9.2, R9.3 and R9.4.	
<b>Revised R9</b>	The agreement identified in R2 between the Nuclear Plant Generator Operator and the applicable Transmission Entities is missing one or more sub-components of R9.1.	The agreement identified in R2 between the Nuclear Plant Generator Operator and the applicable Transmission Entities is missing from one to five of the combined sub-components in R9.2, R9.3 and R9.4.	The agreement identified in R2 between the Nuclear Plant Generator Operator and the applicable Transmission Entities is missing from six to ten of the combined sub-components in R9.2, R9.3 and R9.4.	The agreement identified in R2 between the Nuclear Plant Generator Operator and the applicable Transmission Entities is missing eleven or more of the combined sub-components in R9.2, R9.3 and R9.4.	<b>No changes.</b>