

Consideration of Comments on Staff Proposed Violation Severity Levels for Project 2007-23 — Violation Severity Levels

The Violation Severity Levels Drafting Team (VSL DT) thanks all commenters who submitted comments on the proposed Violation Severity Levels (VSLs), posted for a 45-day public comment period from August 2, 2010 through September 16, 2010. There were 13 sets of comments, including comments from 25 different people representing 24 companies.

The industry stakeholder comments received proposed improvements to reliability standard VSLs to ensure clarity and comply with both [NERC's VSL guidelines](#) and FERC's VSL guidelines.

FERC directed NERC to evaluate existing VSLs using the guidelines provided in the [June 19th Order](#) on VSLs. Those guidelines are:

- (1) VSL assignments should not have the unintended consequence of lowering the current level of compliance;
- (2) VSL assignments should ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties;
- (3) VSL assignments should be consistent with the corresponding requirement; and
- (4) VSL assignments should be based on a single violation, not on a cumulative number of violations.

The following are highlights of stakeholder feedback and the VSL DT response to each item.

Ambiguous VSL Language: Some stakeholders felt that some VSLs contained ambiguous language and that improvements were needed per FERC Guideline 2b. The VSL DT revised if applicable, however, in some cases (i.e. MOD-010 R1), the text questioned was found to be consistent with the requirement language and no change was made by the VSL DT.

Roll-up of VSLs for sub-requirements: Multiple respondents were confused by the way in which VSLs were presented for staff proposals to incorporate the subrequirements into the main requirement VSL. As presented, the proposal did not reflect "N/A" across all four severity levels for the former independent subrequirement VSLs. The VSL DT confirms that in these situations the subrequirement VSLs are effectively removed and marked "N/A," whether or not that is reflected in the posted set of proposed changes.

Subrequirement Priority: Several stakeholders questioned why certain sub-requirements were weighted differently or given a greater priority when incorporating (or "rolling up") the subrequirements into the parent requirement VSL text. Some commenters believed that the severity level should have been based on missing a certain number or percentage of the sub-parts. The NERC VSL Guideline

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documentation recognizes that in some instances sub-requirements may contribute unequally to the requirement. In those instances the noncompliance with each of the parts should be clearly associated with at least one of the VSLs. The VSL DT reviewed the suggestions by stakeholders but in some cases felt the priority weighting was appropriately applied and no changes were made.

Multiple Standard Versions: Some commenters questioned why multiple versions of the standards were included in the scope of this VSL project and why the latest version did not supersede prior versions. For instances where a standard has been NERC BoT approved but not yet FERC approved, the newer version may already be in effect if already approved for use by a regulatory body other than FERC. Therefore it is appropriate to cover VSLs for both projects.

Minor Text Changes: Minor grammar improvements were made on various VSLs to improve readability and clarity. Also, some text changes were applied to better align and improve consistency with the language of the associated requirement. The VSL DT appreciates the overall support from the industry in its work to revise the VSLs for the initial sets of approved standards. All work associated with this project can be found at:

Summary of responses to comments and conforming changes made by the VSL DT:

While individual comment response are provided below, the following is a summary highlighting areas where the VSL DT elected to make changes to the previously proposed NERC staff VSL recommendations based on stakeholder feedback received through the September 16 comment period.

BAL Standards

BAL-002-0 R2 The VSL DT confirms that no VSLs will be applied to the R2 sub-requirements. The primary requirement VSL as proposed during the comment period was previously adjusted per FERC guidance.

BAL-002-0 R4 The VSL DT agrees with some stakeholders that the BA entity was missing from the VSL and the BA has been added to the VSL requirement.

BAL-002-0 R5 The VSL DT clarifies that the proposed changes are consistent with previous guidance from FERC and better match the existing levels of non-compliance language. No changes made.

BAL-004-0 R3 Per stakeholder feedback the text “when requested” was added to the VSL text for consistency of the requirement language. The VSL was not adjusted to reflect a gradation by the number of violations over a calendar year as proposed by some stakeholders as the proposal violates FERC Guideline 4. Changes made.

BAL-005-0.1 R1 The VSL DT agreed with stakeholder comment that suggested the subrequirement VSLs for R1 be reflected in the primary requirement.

BAL-005-0.1 R3 Minor grammar change for clarity.

BAL-00-5-0.1 R4 Minor text change in the Severe VSL ... revised “is” to “was”.

BAL-005-0.1 R6 Revised the Severe VSL for clarity and understanding per stakeholder feedback.

BAL-005-0.1 R8 Revised the VSLs to reference “data acquisition” for consistency with the requirement language.

BAL-005-0.1 R11 The VSLs were revised to better reflect the requirement language. Adjusted to reflect that ramp rates were “agreed” between the BA parties.

COM Standards

COM-001-1.1 R3 The VSL language was revised per proposed stakeholder feedback to better reflect the requirement language.

EOP Standards

EOP-001-0 R5 One stakeholder questioned the proposed change in VSLs, however, its noted that the proposed changes are consistent with existing Levels of Non-Compliance within the standard. The prior balloted language version inappropriately lessened violation severity. No changes made.

EOP-001-1 R1 Modified to be consistent with draft interpretation while still being consistent with the language in the requirement.

EOP-001-1 R4 and EOP-001-2 R4 One stakeholder questioned the proposed change in VSLs, however, it is noted that the proposed changes are consistent with existing Levels of Non-Compliance within the standard. The prior balloted language version inappropriately lessened violation severity. No changes made.

EOP-001-1 R1 The VSLs were revised to mitigate a gap in the % gradation. The team recognizes concerns with the VSL consistency with an on-going interpretation of the standard related to requirement R1. However, since the interpretation is not yet NERC BoT approved the use of % gradation remains.

EOP-001-1 R3 Some stakeholder expressed disagreement with use of placing a level of “importance” on subrequirement text within the construct of the VSLs. However, the NERC VSL Guidelines indicate if a requirement has several parts, and the parts contribute *unequally* to the reliability-related objective of the requirement, then noncompliance with each of the parts should be clearly associated with at least one of the VSLs. No changes made by VSL DT.

EOP-001-1 R5 and EOP-001-2 R5 Accepted stakeholder recommendation to revise a binary VSL into two VSLs (one at High and one at Severe).

EOP-001-1 R6 Some stakeholder expressed disagreement with use of placing a level of “importance” on subrequirement text within the construct of the VSLs. However, the NERC VSL Guidelines indicate if a requirement has several parts, and the parts contribute *unequally* to the reliability-related objective of the requirement, then noncompliance with each of the parts should be clearly associated with at least one of the VSLs. No changes made by VSL DT.

EOP-003-1 R7 Per stakeholder feedback we have removed the second sentence within the VSLs.

EOP-005-1 R1 Per stakeholder feedback the VSLs were revised to include further gradation of severity levels. The VSL language was also revised to better match the requirement language.

EOP-005-1 R11 Some stakeholder expressed disagreement with use of placing a level of “importance” on subrequirement text within the construct of the VSLs. However, the NERC VSL Guidelines indicate if a requirement has several parts, and the parts contribute *unequally* to the reliability-related objective of the requirement, then noncompliance with each of the parts should be clearly associated with at least one of the VSLs. No changes made by VSL DT.

FAC Standards

FAC-001-0 R2 Per stakeholder feedback the roll-up of this requirement was revised to replace the binary VSL with four VSL gradations.

FAC-009-1 R2 The VSLs were revised per stakeholder feedback to remove references to “all entities” and more appropriately refer to the requesting entity.

FAC-010-2.1 R2 The VSLs were not as requested to treat all subrequirements equally – some subrequirements make a greater contribution to the reliability intent of the requirement.

FAC-010-2.1 R3 The VSLs were modified per stakeholder feedback for greater consistency with the requirement language.

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FAC-011-2 R2 The VSLs were not as requested to treat all subrequirements equally – some subrequirements make a greater contribution to the reliability intent of the requirement.

FAC-011-2 R3 The VSLs were modified per stakeholder feedback for greater consistency with the requirement language.

FAC-013-1 R2 Per stakeholder comments the reference to “establishing transfer capabilities” was deleted as its not consistent with the requirement language. Additionally, the subrequirement VSLs for R2 have been rolled-up and now covered by the parent requirement.

FAC-014-2 R1 The VSLs were revised to better match the requirement language as requested by stakeholder comments. A graded 5% increment approach was utilized.

FAC-014-2 R2 The VSLs were revised to better match the requirement language as requested by stakeholder comments. A graded 5% increment approach was utilized.

FAC-014-2 R3 The VSLs were revised to better match the requirement language as requested by stakeholder comments. A graded 5% increment approach was utilized.

FAC-014-2 R4 The VSLs were revised to better match the requirement language as requested by stakeholder comments. A graded 5% increment approach was utilized.

FAC-014-2 R5 The roll-up VSLs used for this requirement were revise to simplify and for clarification. Additionally, references to the sub-requirement numbers are now included for clarification.

FAC-014-2 R6 – The roll-up VSLs were revised to move the sub-requirement aspect of R6.2 to the Lower VSL per stakeholder comment.

INT Standards

INT-001-3 R1 The VSL text was modified to better reflect the requirement language.

INT-001-3 R3, INT-005-3 R1 and INT-007-1 R1 One stakeholder noted a preference to retain graded VSLs that reflect increasing severity per the number of violations (one, two, three or four) which are consistent with the stated Levels of Non-Compliance in these standards. However, the requirement language reference is to a single Arranged Interchange transaction and the stated VSL preference violates FERC Guideline 4 that indicates the VSL assignment should be based on a single violation and not a cumulative number of violations. No changes made to the VSLs.

INT-004-2 R1 The Severe VSL was modified for clarity per stakeholder comments.

INT-008-1 R1 The VSLs were modified per stakeholder feedback for clarity and greater consistency with the requirement language.

IRO Standards

IRO-001-1.1 R3 The Severe VSL retained to reflect a timeframe dimension of the requirement.

IRO-001-1.1 R4 The VSLDT agreed with stakeholder comments to remove the reference for failing to “perform” per the agreement based on an inconsistency with requirement language. For simplicity the prior % graduation VSLs were modified to focus on two VSL levels.

IRO-002-1 R9 The Severe VSL was modified per stakeholder input to better reflect the requirement language to focus on the RC having a procedure for mitigating outages for its analysis tools.

IRO-002-1 R6 The High VSL was adjusted for clarity.

IRO-005 R1 The VSLs were modified per stakeholder comment and consistency with other requirement VSLs.

IRO-014-1 R2 The VSLs were modified to move the Lower VSL to Moderate and the Severe VSL was revised to better clarify that both sub-requirements being missed would result in a Severe VSL.

IRO-014-1 R3 The VSLs were modified to move the Lower VSL to Moderate and the Severe VSL was revised to better clarify that both sub-requirements being missed would result in a Severe VSL.

MOD Standards

MOD-010-0 R1 Stakeholder feedback indicated a disagreement with the phrase “appropriate equipment characteristics” as stated in the VSL language indicating “appropriate” is ambiguous and vague violation FERC Guideline 2. However, the VSLDT notes that the language is consistent with the current requirement language and no change was made.

The commenter also disagreed with the elimination of the prior used quartile approach. The VSLDT believes the more stringent percentages are valid based on FERC Guideline 3. No changes made.

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MOD-010-0 R2 A commenter disagreed with the elimination of the prior used quartile approach. The VSLDT believes the more stringent percentages are valid based on FERC Guideline 3. No changes made.

MOD-012-0 R1 Stakeholder feedback indicated a disagreement with the phrase “appropriate equipment characteristics” as stated in the VSL language indicating “appropriate” is ambiguous and vague violation FERC Guideline 2. However, the VSLDT notes that the language is consistent with the current requirement language and no change was made.

MOD-012-0 R2 Stakeholders noted VSL inconsistencies between similar R2 requirement language found in the MOD-010 and MOD-012 standards. The VSLs of MOD-012 were modified to maintain the consistency desired. The VSLDT elected to use the VSL language from MOD-010 as it focused on potential for missing data as well as the timeframe in which the data was provided.

NUC Standards

NUC-001-2 R4 The VSLs were revised per stakeholder feedback to incorporate additional VSL gradation. A Moderate VSL was added.

PER Standards

PER-004-1 R5 The VSLDT recognizes stakeholder feedback that proposed revision to the Severe VSL for clarity, however, the VSL as written better reflects the requirement language. The proposed change potentially violates FERC Guideline 3 which indicates the VSL should not redefine the requirement.

PRC Standards

PRC-001-1 R4 Stakeholder feedback indicated a disagreement with the phrase “major transmission lines” as stated in the VSL language indicating “major” is ambiguous and vague violation FERC Guideline 2. However, the VSLDT notes that the language is consistent with the current requirement language and no change was made.

TOP Standards

TOP-002-2a R11 Per stakeholder feedback the Lower and Moderate VSLs were switched to better reflect important aspects of the requirement.

TOP-002-2a R17 The binary severe VSL was revised per stakeholder comments.

TOP-005-1.1 R1 The VSLs were revised to better reflect the intention of Attachment 1. Revised per stakeholder feedback.

TOP-005-1.1 R4 & TOP-005-2 R3 Revised the VSLs per stakeholder comments that indicated the use of “some” in the Lower VSL violated FERC Guideline 2b. The VSLs were revised to use the % gradation across all four VSLs..

TOP-006-1 R4 and TOP-006-2 R4 A few stakeholders noted that they could not see a difference between the “Balloted Language” and “Proposed Change” for the version 1 standard VSLs. The VSLDT confirms there was no change. A review of the version 2 standard indicated a slight wording change with no substantive change. The VSLs for each now reflect the text previously stated in the version 1 standard.

TOP-007 R3 The VSLs were revised per stakeholder comment to reflect a binary Severe VSL in place of the gradation reflected as a proposed change. The prior proposed change appears to be an inadvertent inclusion of the R2 VSLs. This change reverts back to original balloted text.

TPL Standards

TPL-001-0.1 R1, TPL-002-0 R1, TPL-003-0 R1 It is noted that one stakeholder expressed a preference for the prior VSL language that did not utilize the roll-up noting that the prior sub-requirement VSLs appropriately reflected a varying importance of certain sub-requirement aspects. However, further review indicates the prior format was preserved to the extent possible in the VSL roll-up. The only exception being the elimination of the prior used quartile for some of the sub-requirements. The VSLDT believes the more stringent percentages are valid based on FERC Guideline 3. No changes made.

VAR Standards

VAR-001-1 R3.1 The VSL text was revised to avoid and unintended situation where the specifically stated number and indicated % could be in conflict. The VSLs were revised to retain only the % gradation.

VAR-001-1-1 R4 Per stakeholder feedback an additional Severe VSL aspect was added for requirement language consistency.

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Comments on VSLs:

Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
BAL-004	R3	See comments below.			
BAL-005-1-b	R3		The Balancing Authority providing Regulation Service failed to ensure that one of the following: metering, communication, or control was provided. [Moderate should be re-written as above to emphasize the “or”].		
<p>Response: Thank you for your comment. The VSL DT agrees that this change adds clarity and has modified the VSL accordingly.</p>					
COM-001-1.1	R3			See comments below.	
EOP-001-1	R1	See comments below.			
EOP-001-2	R1	See comments below.			
EOP-001-1	R5	See comments below.			
EOP-001-2	R5	See comments below.			

BAL-004, R3 : We do not agree that the VSL should be changed without changing the requirement. The requirement and the original VSL obviously contemplated a performance over a year. Although the new requirements for VSL are not supposed to be over a time period, they are allowed to be over a time period if called for in the Requirement. Perhaps a quick action should be initiated to add “over a calendar year” to this Requirement. Failure to incorporate a time error, especially for a small entity, is not different than missing a schedule. There is no need for this to be binary and obviously as mentioned above was not contemplated to be so.

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Response: Thank you for your comment. The suggestion was not adopted as it would propose assessing compliance based on a cumulative number of violations rather than a single violation - and would not meet FERC's Guideline 4.

COM-001-1.1 R3 : Do not agree. There appear to be different levels of non-performance like the original VSL implies. You could have a means for coordination but it might not include the ability to investigate and recommend solution.

Response: Thank you for your comment. Suggestion not adopted to maintain agreement with FERC Guideline 3.

EOP-001-1 R1 : Disagree. There is an Interpretation which clarifies the extent of emergency agreements (not all adjacent BAs). This VSL should either match the Interpretation and await FERC approval of the VSL consistent with that or BE REMOVED from this consideration. This is an attempt to fix a broken VSL for a broken requirement.

Response: Thank you for your comment. The VSLs were revised to mitigate a gap in the percentage gradation. The team recognizes concerns with the VSL consistency with an on-going interpretation of the standard related to requirement R1. However, since the interpretation is not yet NERC BoT approved the use of percentage gradation remains.

EOP-001-2 R1 : Disagree. There is an Interpretation which clarifies the extent of emergency agreements (not all adjacent BAs). This VSL should either match the Interpretation and await FERC approval of the VSL consistent with that or BE REMOVED from this consideration. This is an attempt to fix a broken VSL for a broken requirement.

Response: Thank you for your comment. The VSLs were revised to mitigate a gap in the percentage gradation. The team recognizes concerns with the VSL consistency with an on-going interpretation of the standard related to requirement R1. However, since the interpretation is not yet NERC BoT approved the use of percentage gradation remains.

EOP-001-1 R5 : Should be split. It seems to be lumping VRF into the decision to assign VSL. Clearly not updating and not sharing an update are about the same risk. However, not reviewing (and updating) is severe because that means the plan TO failed to do everything. Just not mailing a copy to potentially one BA for whom the change was not impactful is not the same level of performance mistake.

Response: Thank you for your comment. Suggestion adopted.

EOP-001-2 R5 : Should be split. It seems to be lumping VRF into the decision to assign VSL. Clearly not updating and not sharing an update are about the same risk. However, not reviewing (and updating) is severe because that means the plan TO failed to do everything. Just not mailing a copy to potentially one BA for whom the change was not impactful is not the same level of performance mistake.

Response: Thank you for your comment. Suggestion adopted.

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SERC Planning Standards Subcommittee | Philip Kleckley and Additional Members/Organizations
 Comments on VSLs:

Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
FAC-001-0	R2	The Transmission Owner's facility connection requirements do not address one of the sub-components. (R2.1.1 to R2.1.16)	The Transmission Owner's facility connection requirements do not address two of the sub-components. (R2.1.1 to R2.1.16)	The Transmission Owner's facility connection requirements do not address three of the sub-components. (R2.1.1 to R2.1.16)	The Transmission Owner's facility connection requirements do not address four or more of the sub-components. (R2.1.1 to R2.1.16)
<p>Response: Thank you for your comment. The rollup of these VSLs was modified to replace the binary VSL with a set of graded VSLs.</p>					
FAC-013-1	R2	Delete the term "but one or more Transfer Capabilities,"			
<p>Response: Thank you for your comment. Suggestion adopted with other modifications to the VSLs.</p>					
FAC-014-2	R1, R2, R3, & R4 It is not clear how an auditor would determine if an SOL should have been established.	. Delete the sentence before the word "OR."	Delete the sentence before the word "OR."	Delete the sentence before the word "OR."	Delete the sentence before the word "OR."
<p>Response: Thank you for your comment. The entire set of VSLs for Requirement R4 has been modified based on stakeholder comments and to improve clarity, ensure consistency with other VSLs, and comply with recommendations of the VSL guidelines.</p>					
FAC-014-2	R5 The proposed VSL is inconsistent	The responsible entity provided its SOLs to all entities that have a reliability related need and provided a written request but missed	One of the following: The responsible entity provided its SOLs to all but one of the required entities that have a reliability related need and provided a written	One of the following: The responsible entity provided its SOLs to all but two of the required entities that have a reliability related need and provided a	One of the following: The responsible entity failed to provide its SOLs to more than two of the required entities that have a reliability related need and

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Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
	with the requirement.	meeting one or more of the schedules by less than 15 calendar days.	request within the schedules provided. (R5) OR The responsible entity provided its SOLs to all the required entities that have a reliability related need and provided a written request but missed meeting one or more of the schedules for 15 or more but less than 30 calendar days. OR The supporting information provided with the IROLs does not address 5.1.4	written request within the schedules provided. (R5) OR The responsible entity provided its SOLs to all the required entities that have a reliability related need and provided a written request but missed meeting one or more of the schedules for 30 or more but less than 45 calendar days. OR The supporting information provided with the IROLs does not address 5.1.3	provided a written request within 45 calendar days of the associated schedules. OR The supporting information provided with the IROLs does not address 5.1.1 and 5.1.2.
<p>Response: Thank you for your comment. Suggestion adopted to improve clarity.</p>					
MOD-010-0	R2 Recommend the following to make it consistent with R2 of MOD-012-0	If a deadline has been established in the procedures required in MOD-011, the responsible entity provided data, but did so at least one but not more than ten calendar days beyond the deadline. OR If a deadline has not been established, the responsible entity provided data, but did so	If a deadline has been established in the procedures required in MOD-011, the responsible entity provided data, but did so at least eleven but not more than twenty calendar days beyond the deadline. OR If a deadline has not been established, the responsible entity provided data, but did so at least forty-one but not more than fifty calendar	If a deadline has been established in the procedures required in MOD-011, the responsible entity provided data, but did so at least twenty-one but not more than thirty calendar days beyond the deadline. OR If a deadline has not been established, the responsible entity provided data, but did so at least	If a deadline has been established in the procedures required in MOD-011, the responsible entity provided data, more than thirty calendar days beyond the deadline. OR If a deadline has not been established, the responsible entity provided data, but did so more than sixty calendar days beyond the request. OR

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		at least thirty-one but not more than forty calendar days beyond the request	days beyond the request	fifty-one but not more than sixty calendar days beyond the request	The responsible entity failed to provide data.
Response: Thank you for your comment. The VSLs for MOD-012-0 R2 were modified for consistency with the VSLs for MOD-010-0 R2.					
PRC-009-0	R2	The responsible entity has provided the documentation in more than 90 calendar days but less than 100 calendar days.	The responsible entity has provided the documentation in 100 calendar days but less than 110 calendar days.	The responsible entity has provided the documentation in 110 calendar days but less than 120 calendar days.	The responsible entity has provided the documentation in 120 or more calendar days after the system event. OR The responsible entity has not provided the documentation.
Response: Thank you for your comment. Suggestion adopted based on tardiness increments recommended by VSL guidelines.					

Comments: : “The comments expressed herein represent a consensus of the views of the above-named members of the SERC EC Planning Standards Subcommittee only and should not be construed as the position of SERC Reliability Corporation, its board, or its officers.”

Response: Thank you for your comment.

Kurtis B. Chong, Ontario IESO

Comments on VSLs:

Standard Number	Req’t No.	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
BAL-002-0	R4	The BA is not mentioned in the VSL whereas it is mentioned in the requirement.			
Response: Thank you for your comment. The VSL DT has added “Balancing Authority” to the VSLs to maintain consistency with the language in the requirement.					
BAL-004-0	R3	Insert “when requested” after each occurrence of “Time Error Correction”.			

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Standard Number	Req't No.	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
Response: Thank you for your comment. Suggestion adopted.					
BAL-005-0.1b	R1.1, R1.2 & R1.3	These proposed changes are not consistent with the principle of incorporating the VLSs of the sub-requirements into the main requirement. We recognize that the sub-requirements are in fact distinct requirements that apply to different entities but that notwithstanding, we prefer to maintain a consistent VLS structure. They should be "ORed" together.			
Response: Thank you for your comment. Suggestion adopted.					
BAL-005-0.1b	R4	Change "is" to "was".			
Response: Thank you for your comment. The VSL DT has changed "is" to "was."					
BAL-005-0.1b	R6	The Severe VSL is confusing. If the BA is unable to calculate ACE for more than 30 minutes, it is not clear what would be the significance of the method it attempted to use and why that would cause an otherwise Lower VSL to be promoted to Severe. The fact still remains that the BA was unable to calculate ACE for more than 30 minutes and did not inform the RC.			
Response: Thank you for your comment. Suggestion adopted, and the Severe VSL was modified for clarity.					
BAL-005-0.1b	R8	The High VSL does not reflect the requirement for agreement between BAs. We view this as essential since it is a safeguard against misunderstanding of what the ramp rates should be.			
Response: Thank you for your comment. The requirement does not refer to the need for an agreement between Balancing Authorities. Suggestion not adopted to keep VSL language consistent with requirement language.					
COM-001-1.1 Change proposed to more closely match the requirement.	R3				The responsible entity failed to provide a means to coordinate telecommunications among its respective areas including the ability to assisting in the investigation and

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Standard Number	Req't No.	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
					recommending of solutions to telecommunications problems within the area and with other areas.
<p>Response: Thank you for your comment. Suggestion adopted for consistency with language in the requirement.</p>					
FAC-003-1	R4	<p>While we agree that Regional Entity compliance with NERC reliability standards requirements could be appropriately addressed under NERC ROP, Section 100 does not specifically state this. It states “Each regional entity shall comply with these rules of procedure as applicable to functions delegated to the regional entity by NERC...”. Is the proposed change based on this statement? Please elaborate.</p>			
<p>Response: Thank you for your comment. Yes, per Section 100 of NERC’s Rules of Procedure, requirements assigned to the Regional Entity (RRO) are addressed as a Rules of Procedure violation, rather than through the Compliance program. In addition, Order 693 Paragraph 157 describes the Commission view that RROs are not applicable entities for standard requirements.</p>					
<p>FAC-009-1</p> <p>Given that a VLS should be based on a single violation (Guideline 4), the VSLs should not refer to ‘one’, ‘two’ or ‘all’ of the requesting entities since requests by such entities should be treated independently and not as a group.</p> <p>Also, when is the responsible entity deemed to have not provided its Facility Ratings, 26 days, 36 days after the scheduled date? Unless this is defined the responsible entity can only be regarded as being late so the second part of the Severe VSL is unnecessary.</p>	R2	<p>The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by up to 15 calendar days.</p>	<p>The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 15 calendar days but less than or equal to 25 calendar days.</p>	<p>The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 25 calendar days but less than or equal to 35 calendar days.</p>	<p>The responsible entity did not provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 35 calendar days after the schedule.</p> <p>OR</p> <p>The responsible entity did not provide its Facility Ratings to all of the requesting entities.</p>

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Our proposed changes recognize that each request/response is a separate 'transaction' in respect of which the responsible entity's compliance must be assessed.					
Response: Thank you for your comment. Suggestion adopted to comply with Guideline 4.					
FAC-010-2.1 Changes made to more closely match the wording of the requirement. R1 already states that the Planning Authority shall have an SOL methodology. R2 addresses the key components of the methodology.	R2	The Planning Authority's SOL has a Methodology for determining SOLs that is missing one requirement as described in parts R2.1, R2.2, R2.3, R2.4, R2.5, or R2.6.	The Planning Authority's SOL has a Methodology for determining SOLs that is missing two requirements as described in parts R2.1, R2.2, R2.3, R2.4, R2.5, or R2.6.	The Planning Authority's SOL has a Methodology for determining SOLs that is missing three requirements as described in parts R2.1, R2.2, R2.3, R2.4, R2.5, or R2.6.	The Planning Authority's SOL has a Methodology for determining SOLs that is missing four or more requirements as described in parts R2.1, R2.2, R2.3, R2.4, R2.5, or R2.6.
Response: Thank you for your comment. The suggestion was not adopted as the subrequirements don't contribute equally to the reliability intent of the requirement.					
FAC-010-2.1 Same comment as for R2.	R3	The Planning Authority's SOL has a Methodology for determining SOLs that includes a description for all but one of the following parts of R3: R3.1 through R3.6.	The Planning Authority's SOL has a Methodology for determining SOLs that includes a description for all but two of the following parts of R3: R3.1 through R3.6.	The Planning Authority's SOL has a Methodology for determining SOLs that includes a description for all but three of the following parts of R3: R3.1 through R3.6.	The Planning Authority's SOL has a Methodology for determining SOLs that is missing a description of four or more of the following parts of R3: R3.1 through R3.6.
Response: Thank you for your comment. The suggestions were adopted for consistency with the language in the requirement.					
FAC-011-2 Changes made to more	R2	The Reliability Coordinator's SOL has a methodology for	The Reliability Coordinator's SOL has a methodology for	The Reliability Coordinator's SOL has a methodology for	The Reliability Coordinator's SOL has a methodology for

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closely match the wording of the requirement. R1 already states that the Planning Authority shall have an SOL methodology. R2 addresses the key components of the methodology.		determining SOLs that is missing one requirement as described in parts R2.1, R2.2, R2.3, or R2.4.	determining SOLs that is missing two requirements as described in parts R2.1, R2.2, R2.3, or R2.4.	determining SOLs that is missing three requirements as described in parts R2.1, R2.2, R2.3, or R2.4.	determining SOLs that is missing four or more requirements as described in parts R2.1, R2.2, R2.3, or R2.4.
Response: Thank you for your comment. The suggestion was not adopted as the subrequirements don't contribute equally to the reliability intent of the requirement.					
FAC-011-2 Same comment as for R2. Also there is a typo in the Severe VLS.	R3	The Reliability Coordinator's SOL has a M methodology for determining SOLs that includes a description for all but one of the following parts of R3: R3.1 through R3.7.	The Reliability Coordinator's SOL has a M methodology for determining SOLs that includes a description for all but two of the following parts of R3: R3.1 through R3.7.	The Reliability Coordinator's SOL has a M methodology for determining SOLs that includes a description for all but three of the following parts of R3: R3.1 through R3.7.	The Reliability Coordinator's SOL has a M methodology for determining SOLs that is missing a description of three four or more of the following parts of R3: R3.1 through R3.7.
Response: Thank you for your comment. The suggestions were adopted for consistency with the language in the requirement.					
FAC-011-2	R4	Change "Planning Authority" to "Reliability Coordinator"	Change "Planning Authority" to "Reliability Coordinator"	Change "Planning Authority" to "Reliability Coordinator"	Change "Planning Authority" to "Reliability Coordinator"
Response: Thank you for your comment. Suggestion adopted.					
FAC-013-1 The Lower VLS and the first parts of the Moderate, High and Severe VLSs seem to be the VLSs for R1.	R2	The responsible entity failed to provide Transfer Capabilities to 5% or less of the required entities.	Delete first part.	Delete first part.	Delete first part.
Response: Thank you for your comment. Suggestion adopted. The first portion of the VSLs appears to have been intended for R1 and was deleted. The Lower VSL was modified for consistency with the language in the requirement.					

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FAC-013-1 The VSLs for this part should be incorporated into the main requirement.	R2.1	Delete	Delete	Delete	Delete
Response: Thank you for your comment. Suggestion adopted.					
FAC-013-1 The VSLs for this part should be incorporated into the main requirement.	R2.2	Delete	Delete	Delete	Delete
Response: Thank you for your comment. Suggestion adopted.					
FAC-014-2 The VLSs appear to be the same as the proposed VLSs for R2. The Severe VSL seems to be incorrect.	R1	No change to balloted VSL.	No change to balloted VSL.	No change to balloted VSL.	There are SOLs for the Reliability Coordinator Area, but more 75% of these are inconsistent with the Reliability Coordinator's SOL Methodology.
Response: Thank you for your comment. The entire set of VSLs for Requirement R1 has been rewritten based on stakeholder comments and to improve clarity, ensure consistency with other VSLs, and comply with recommendations of the VSL guidelines. The VSLs as proposed seemed to correspond with Requirement R2 rather than R1.					
FAC-014-2	R3	The requirement uses Planning Authority. While both of these are defined terms and are identical, is it appropriate for the VSLs to use a different term? The VSLs should be consistent with the requirements.			
Response: Thank you for your comment. The entire set of VSLs for Requirement R3 has been modified based on stakeholder comments and to improve clarity, ensure consistency with other VSLs, and comply with recommendations of the VSL guidelines.					

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<p>FAC-014-2</p> <p>Same comment as R3 with respect to the Planning Authority. Also, the requirement does not refer to "Transmission Planner's portion of the Planning Coordinator Area..."</p>	<p>R4</p>	<p>There are one or more SOLs in the Transmission Planner's portion of the Planning Coordinator Transmission Planning Area that should have been established by the Transmission Planner that have not, and they make up less than 5% of all SOLs in the Transmission Planner's Transmission Planning Area-portion of the PC area.</p> <p>OR</p> <p>There are one or more SOLs in the Transmission Planner's portion of the Planning Coordinator Transmission Planning Area that were established by the Transmission Planner inconsistent with their Planning Coordinator's SOL Methodology, and they make up less than 5% of all SOLs in the Transmission Planner's Transmission Planning Area-portion of the PC area.</p>	<p>Conforming changes as for the Lower VSL.</p>	<p>Conforming changes as for the Lower VSL.</p>	<p>Conforming changes as for the Lower VSL.</p>
<p>Response: Thank you for your comment. The entire set of VSLs for Requirement R3 has been modified based on stakeholder comments and to</p>					

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improve clarity, ensure consistency with other VSLs, and comply with recommendations of the VSL guidelines.					
<p>FAC-014-2</p> <p>The first part of the Moderate VLS is essentially the same as the Lower. The same is true for the High VSL. If an entity does not meet the SOL delivery schedule for 1 of the required entities by less than 15 days, then either a Lower, Moderate or High VSL may apply. This is probably a typo.</p>	R5		Delete the first part of the VSL.	Delete the first part of the VSL.	
Response: Thank you for your comment. Suggestion adopted to avoid confusion and eliminate redundancy with other parts of the VSL.					
<p>INT-001-3</p> <p>The requirement is for the LSE and PSE to ensure that the Arranged Interchange is submitted so that the VLS should be written accordingly as is done for R2.</p>	R1				<p>The Load-Serving, Purchasing-Selling Entity failed to ensure that submit a Dynamic Schedule at the expected average MW profile for an hour was submitted to the Interchange Authority; as required by R1.1.</p>
Response: Thank you for your comment. Suggestion adopted.					
<p>INT-004-2</p> <p>The responsible entity has to do two things, (1)</p>	R1	No change			<p>The responsible entity that initiated a curtailment failed to release the limit on the Interchange</p>

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<p>release the limit under the appropriate conditions and (2) communicate the release to the Sink BA. For the Severe VSL, if the limit is not released, there would be nothing to communicate to the Sink BA so the VLS should be amended as proposed.</p> <p>If however the intent is that the responsible entity should have recognized that changed conditions allowed for the reloading of the transaction but did not, the VSL should be reworded appropriately..</p>					<p>Transaction tag, at such time as the reliability event allowed for the reloading of the transaction, and failed to communicate the release of the limit to the Sink Balancing Authority.</p>
<p>Response: Thank you for your comment. Suggestion adopted.</p>					
<p>INT-006-3</p> <p>Each responsible entity has a requirement to <u>respond</u> to each indicated request from the IA and further the BA must <u>evaluate</u> that three (3) criteria are met and the TSP must <u>confirm</u> that three (3) conditions are satisfied.</p> <p>In the Moderate VSL, the obligations on the TSP are not accounted for and</p>	R1		See comment.		<p>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: OR</p> <p>The responsible entity responded to a request from an Interchange Authority to transition an</p>

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<p>should be included, with the condition that the TSP failed to address one of the elements of R1.2.</p> <p>The High VSL is written in such a way that the obligation on the TSP to respond is not accounted for. Also, the second part of this VSL should be written to cater for failure to address two of the elements of 1.2.</p> <p>Also, the Severe VSL should also cater for the possibility that the responsible entity responded but failed to address all of the elements of 1.1 and 1.2. Finally, when the entity failed to respond, it does not matter what else they did not do, so the first part of the VSL should be truncated as proposed.</p>					<p>Arranged Interchange to a Confirmed Interchange but it either failed to:</p> <p>evaluate Arranged linterchange with respect to any all of the subrequirements R1.1.1, R1.1.2 and R1.1.3.</p> <p>OR</p> <p>The responsible entity failed to confirm that the all of the required elements of R1.2 were satisfied. 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 (R1.2).</p>
<p>Response: Thank you for your comment. The VSL DT finds the VSLs to be clearer as written. Suggestion not adopted.</p>					
<p>INT-008-3</p> <p>The VSLs do not accurately reflect the requirement. The requirement is for the IA to distribute to... <u>whether or not the Arranged</u></p>	<p>R1</p>	<p>The Interchange Authority responsible entity distributed the Arranged Interchange to all Balancing Authorities (including Balancing Authorities on both sides of a direct current tie),</p>	<p>Etc.</p>	<p>Etc.</p>	<p>Etc.</p>

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<p><u>Interchange had transitioned to a Confirmed Interchange.</u> As written, the VLSs focuses on distributing the Arranged Interchange.</p> <p>Also, replace “responsible entity”, with Interchange Authority since the only “target” of the requirement is the IA.</p>		<p>Transmission Service Providers and Purchasing-Selling Entities involved in the Arranged Interchange whether or not the Arranged Interchange had transitioned to a Confirmed Interchange but ...</p>			
<p>Response: Thank you for your comment. The VSLs were modified as suggested for clarity and consistency with the requirement language.</p>					
<p>IRO-001-1.1 The second part of the VSLs does not meet the FERC guideline</p>	<p>R4</p>	<p>The second part: “5% or less of the tasks are not performed according to the agreement” does not correspond to the requirement since R1 does not ask for performing the tasks per the agreement. Its inclusion does not meet with the FERC guideline. Suggest to delete it.</p>	<p>Delete the second part of the VSL for the same reason mentioned for the Lower VSL.</p>	<p>Delete the second part of the VSL for the same reason mentioned for the Lower VSL.</p>	<p>Delete the second part of the VSL for the same reason mentioned for the Lower VSL.</p>
<p>Response: Thank you for your comment. Based on your suggestions, the VSL DT removed the reference to a failure “to perform according to the agreement” to maintain consistency with the requirement language. Further, to make the VSLs clearer and more consistent with other VSLs, the prior percentage gradation was modified to focus on two VSL levels.</p>					

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<p>IRO-002-1</p> <p>The requirement asks for the RC to have in place a process to control analysis tools including approval for planned maintenance and the procedure to mitigate the effect of their outages. The proposed Severe VSL does not address failure of having the process and procedure in place. Also, the wording in the Severe VSL leaves a question on who needs to seek the RC's approval to proceed with the planned maintenance.</p>					<p>The Reliability Coordinator does not have a process in place to control its analysis tools including approvals for planned maintenance.</p>
<p>Response: Thank you for your comment. Suggestion adopted.</p>					
<p>IRO-005-2</p> <p>R1 is missing the "1"</p>	R1	<p>The term "IRO-005-1" is incorrect and not required.</p>	<p>The term "IRO-005-1" is incorrect and not required.</p>	<p>The term "IRO-005-1" is incorrect and not required.</p>	<p>The term "IRO-005-1" is incorrect and not required.</p>
<p>Response: Thank you for your comment. The "1" has been added to R1, and "IRO-005-1" has been removed from the VSLs.</p>					
	R9		<p>We do not think this condition is needed since we are unable to see the difference between "failing to implement the said plan" in the Moderate VSL and "failing to develop and implement action plans".</p>		

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			There is no point of developing a plan but not implementing it. Failing to implement the plan fails the bulk of the part of this requirement that aims at having the pre-developed plans implemented in real time. We suggest to remove the Moderate VSL.		
<p>Response: Thank you for your comment. It is possible to develop a plan and not implement it, so the VSL DT finds that distinction necessary. Suggestion not adopted.</p>					
	All Rs	We question the need to develop/revise the VSLs for IRO-005-2 when IRO-005-3 is already adopted by the BoT and approved by FERC. Wouldn't IRO-005-3 replace IRO-005-2?			
<p>Response: Thank you for your comment. IRO-005-3 has been approved by the BOT but not by FERC. While it is effective for Canadian entities based on the BOT approval, IRO-005-2 is still applicable to U.S. entities and must be included in this filing.</p>					
IRO-005-3	R1	The term "IRO-005-3" is not required.	The term "IRO-005-3" is not required.	The term "IRO-005-3" is not required.	The term "IRO-005-3" is not required.
<p>Response: Thank you for your comment. "IRO-005-3" has been removed from the VSLs.</p>					
	R6		We do not think this condition is needed since we are unable to see the difference between "failing to implement the said plan" in the Moderate VSL and "failing to develop and implement action plans".		

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			There is no point of developing a plan but not implementing it. Failing to implement the plan fails the bulk of the part of this requirement that aims at having the pre-developed plans implemented in real time. We suggest to remove the Moderate VSL.		
<p>Response: Thank you for your comment. It is possible to develop a plan and not implement it, so the VSL DT finds that distinction necessary. Suggestion not adopted.</p>					
<p>IRO-009-1</p> <p>The “For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day” is the condition under which the RC is being asked to perform the tasks that follows. It is not by itself the requirement and therefore there should not be a VSL assigned to it not being performed.</p>	R1				<p>For an IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identified one or more days prior to the current day, the Reliability Coordinator did not develop an Operating Process, Procedure, or Plan that would identify actions it would take or actions it would direct others to take (up to and including load shedding) that could be implemented in time to prevent exceeding those IROLs.</p>
<p>Response: Thank you for your comment. The VSL DT believes that the proposed changes to the VSLs do reflect the requirement, and do so in a clearer way than suggested above. Suggestion not adopted.</p>					
Same reason as above	R2				<p>For an IROL (in its Reliability Coordinator</p>

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					Area) that the Reliability Coordinator identified one or more days prior to the current day, the Reliability Coordinator did not develop an Operating Process, Procedure, or Plan that would identify actions it would take or actions it would direct others to take (up to and including load shedding) that could be implemented in time to mitigate exceeding that IROL within the IROL's Tv. (R2)
<p>Response: Thank you for your comment. The VSL DT believes that the proposed changes to the VSLs do reflect the requirement, and do so in a clearer way than suggested above. Suggestion not adopted.</p>					
<p>IRO-014-1</p> <p>Failing one of the two sub-requirements constitutes failing ½ of the intent of the requirement so such failure cannot be deemed to have a Lower VSL.</p>	<p>R2</p>	<p>Move this VSL to High</p>		<p>The Reliability Coordinator's Operating Procedure, Process, or Plan was not agreed to by all the Reliability Coordinators required to take the indicated action(s). (R2.1)</p> <p>OR</p> <p>The Reliability Coordinator's Operating Procedure, Process, or Plan was not distributed to all Reliability Coordinators that are required to take the indicated action(s).</p>	

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				(R2.2)	
<p>Response: Thank you for your comment. The Lower VSL was made a Moderate VSL to reflect the importance of failing to complete one half of the intent of the requirement.</p>					
	R3	Move this VSL to High for the same reason indicated for R2		<p>The Reliability Coordinator's Operating Procedure, Process, or Plan failed to reference the associated Reliability Coordinator-to-Reliability Coordinator Operating Procedure, Process, or Plan. (R3.1)</p> <p>OR</p> <p>The Reliability Coordinator's Operating Procedure, Process, or Plan failed to include the agreed-upon actions from the associated Reliability Coordinator-to-Reliability Coordinator Operating Procedure, Process, or Plan. (R3.2)</p>	
<p>Response: Thank you for your comment. The Lower VSL was made a Moderate VSL to reflect the importance of failing to complete one half of the intent of the requirement.</p>					
MOD-012-0 Suggest to use language consistent with that used for the VSLs for R2 of MOD-010-0	R2	<p>Propose to change the second part of this VSL to start with:</p> <p>"No schedule existed, and the Responsible Entity provided data more than 30 but less</p>	Propose Similar changes for Medium VSL	Propose similar change to High VSL	Propose similar change to Severe VSL

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		than or equal to 35 calendar days following the request.			
<p>Response: Thank you for your comment. Suggestion adopted. The VSLs for MOD-012-0 R2 were modified for consistency with the VSLs for MOD-010-0 R2.</p>					
NUC-001-2 Consistency with other VSLs	R7		The Medium VSL should be High VSL to be consistent with other standards where there are two levels of violation – High and Severe, when there are only to sub-requirements or conditions stipulated in the requirement.		
<p>Response: Thank you for your comment. No guideline exists that requires two levels of violation to be divided a certain way. Suggestion not adopted.</p>					
	R8		Same as above		
<p>Response: Thank you for your comment. No guideline exists that requires two levels of violation to be divided a certain way. Suggestion not adopted.</p>					
PER-004-1 The second part of the Severe VSL is not measurable	R5				The Reliability Coordinator did not have a protocol in place to inform operating personnel of updates to the SOL and IROL information.
<p>Response: Thank you for your comment. The language in the second portion of the Severe VSL matches the language in the requirement. Suggestion not adopted.</p>					
TOP-002-2a The condition that there was no communication is	R17				The responsible entity did not communicate, or intentionally delayed communication of, the

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missing.					information described in the requirements R1 to R16 to its Reliability Coordinator.
Response: Thank you for your comment. The language of the VSL was modified to match the intent of the suggestion.					
TOP-003-1 The requirement asks for the responsible entity to make a/v the needed information by a specific time. Failing to meet the time line should constitute a High violation. Suggest to move the Low VSL to High VSL.	R1			The responsible entity failed to provide the information by 1200 Central Standard Time for the Eastern Interconnection and 1200 Pacific Standard Time for the Western Interconnection.	
Response: Thank you for your comment. There is no need to make the Lower VSL a High VSL. Suggestion not adopted.					
TOP-005-1.1 Suggest to move the Low VSL to High VSL. Didn't TOP-005-2 already replace TOP-005-1.1? If so, why are there VSLs posted for both?	R4	Suggest to provide graded VSL in terms of percentage of data not provided, or if part of the data is not provided, then the violation should be a High, not a Lower.		The responsible entity failed to provide some of the data requested by other Balancing Authorities or Transmission Operators.	
Response: Thank you for your comment. Suggestion adopted. VSLs modified to ensure consistency with other VSLs.					
TOP-005-2	R3	Same comment as indicated for TOP-005-1.1 R4. Also, the VSLs for TOP-			

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		005-2 R2, which stipulates similar requirements (to provide data), are graded. There should be consistency between the VSLs for similar type of requirements.			
<p>Response: Thank you for your comment. Other VSLs were modified to ensure consistency with this VSL.</p>					
TOP-006-1	R4			We are unable to tell the difference between the balloted language and the proposed language	We are unable to tell the difference between the balloted language and the proposed language
<p>Response: Thank you for your comment. You are correct – there was no difference between the two sets of VSLs.</p>					
TOP-006-2 Again, why are VSLs for TOP-006-1 posted when the standard has already got a newer version in TOP-006-2?	R5			We are unable to tell the difference between the balloted language and the proposed language	We are unable to tell the difference between the balloted language and the proposed language
<p>Response: Thank you for your comment. FERC has not yet approved TOP-006-2. You are correct, there was no difference between the two sets of VSLs.</p>					
TOP-007-0 We disagree with the graded VSLs by the % of IROL exceedance and/or the time beyond Tv. The corresponding IRO standards deem any exceedance beyond Tv	R3				Following a Contingency or other event that resulted in an IROL violation the Transmission Operator failed to take all appropriate action up to and including shedding of firm load to return its transmission system to

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not corrected (see R4 of IRO-009-1). Implementing load shedding to mitigate IROL exceedance is one of the means to meet the IRL-009 R4 requirement. The failure to correct IROC exceedance within Tv should be assigned a Severe VSL consistent with that of IRO-009-1 R4.					within the IROL in less than 30 minutes.
Response: Thank you for your comment. Suggestion adopted.					
For similar reason as above.	R4	Any failure to evaluate actions, or direct any other action to address SOL or IROL exceedance is deemed to have failed the bulk of the intent of this requirement. There should not be a Lower, Medium or High VSL; there should only be a Sever VSL.			
Response: Thank you for your comment. The VSL DT finds gradation to be both appropriate in this case and consistent with other VSLs. Suggestion not adopted.					
VAR-001-1 Need to use the language in the Requirement. Suggest to replace "Maintain" with "disperse and locate" in the first	R9	The Transmission Operator did not disperse and locate 5% or less of the reactive resources needed to support its voltage under first Contingency	The Transmission Operator did not disperse and locate more than 5% up to (and including) 10% of the reactive resources needed to support its voltage under	The Transmission Operator did not disperse and locate more than 10% up to (and including) 15% of the reactive resources needed to support its	The Transmission Operator did not disperse and locate more than 15% of the reactive resources needed to support its voltage under first

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Standard Number	Req't No.	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
condition in all VSLs. Further, a TOP cannot "maintain" reactive resources as it may not own any.		conditions. OR ...	first Contingency conditions. OR	voltage under first Contingency conditions. OR	Contingency conditions. OR
<p>Response: Thank you for your comment. The requirement does use the word "maintain." Suggestion not adopted.</p>					
<p>VAR-001-1</p> <p>We disagree with the graded VSLs by the % of applicable occurrences. Each failure to correct IROL or SOL violations resulting from reactive resource deficiencies constitutes a complete failure of this requirement.</p> <p>By making VSLs a % of the applicable occurrence is like determining VSLs based on number of violations. This does not meet FERC Guideline 4:</p> <p>Guideline 4 — VSLs should be based on a single violation, not on a cumulative number of violations (unless stated otherwise in the requirement).</p>	R10			<p>The Transmission Operator corrected all IROL or SOL violations resulting from reactive resource deficiencies but failed complete the required IROL or SOL violation reporting.</p>	<p>The Transmission Operator failed to correct IROL or SOL violations resulting from reactive resource deficiencies (IROL violations must be corrected within 30 minutes) and complete the required IROL or SOL violation reporting.</p>
<p>Response: Thank you for your comment. Suggestion not adopted because proposed VSLs as written ensure clarity and consistency with other VSLs and the VSL guidelines.</p>					

Other Comments:

We question the need to develop/revise VSLs for different versions of the same standard, e.g. TOP-005-1.1 and TOP-005-2, and there are some others as indicated in our comments provided in the above Table.

Response: Where FERC hasn't approved the later version, we've posted VSLs for the last version of the requirements approved by FERC as well as any later versions filed with FERC and awaiting approval.

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Kasia Mihalchuk, Manitoba Hydro

Comments on VSLs:

Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
Mod-012-0	R2	<p>The Responsible Entity failed to provide 5% or less of the required dynamic system modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-013-0_R1.</p> <p>OR</p> <p>No schedule existed, and the Responsible Entity provided the required dynamic system modeling and simulation data more than 30 but less than or equal to 35 calendar days following the request.</p>	<p>The Responsible Entity failed to provide more than 5% but less than or equal to 10 % of the required dynamic system modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-013-0_R1.</p> <p>OR</p> <p>No schedule existed, and the Responsible Entity provided the required dynamic system modeling and simulation data more than 35 but less than or equal to 40 calendar days following the request.</p>	<p>The Responsible Entity failed to provide more than 10% but less than or equal to 15 % of the required dynamic system modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-013-0_R1.</p> <p>OR</p> <p>No schedule existed, and the Responsible Entity provided the required dynamic system modeling and simulation data more than 40 but less than or equal to 45 calendar days following the request.</p>	<p>The Responsible Entity failed to provide more than 15% of the required dynamic system modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-013-0_R1.</p> <p>OR</p> <p>No schedule existed, and the Responsible Entity failed to provide the required dynamic system modeling and simulation data more than 45 calendar days following the request.</p>
<p>Response: Thank you for your comment. The majority of your suggestions were adopted. The VSLs for MOD-012-0 R2 were modified for consistency with the VSLs for MOD-010-0 R2.</p>					

Comments:

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MOD-012 – The R2 VSLs have moved to focusing solely on the timeframe taken to provide dynamic modeling data, as opposed to also focusing on the possibility that an entity may not provide modeling data as defined in MOD-013. We believe the R2 VSLs should focus on both the timeframe taken to provide dynamic modeling data as well as the possibility that an entity may not provide dynamic modeling data as defined in MOD-013. We recommend rewording the R2 VSLs to conform closely to the MOD-010 R2 VSLs (see answer to question 1).

Response: Thank you for your comment. Suggestion adopted. The VSLs for MOD-012-0 R2 were modified for consistency with the VSLs for MOD-010-0 R2.

BAL-002-0 R2 - Each of the 5 sub requirements would have a different impact on the BES upon compliance failure. Modifying the VSLs to contain 1 requirement for lower, 2 requirements for moderate, 3 requirements for high and 4 requirements for severe is not logical. Most other proposed changes for “mother” requirement point to specific sub requirements.

Response: Thank you for your comment. In this case, the subrequirements contribute equally to the requirement and it is unnecessary to differentiate among them. Suggestion not adopted.

BAL-004-0 R3 - DISAGREE WITH CHANGES, original VSL were more forgiving, new VSL will cause unnecessary “grief”, even if starting a late time correction, or forgetting to stop one. Use % as done in BAL-002-0 R5.

Lower – Failed to FULLY meet time correction 5 % of the time (include late or early start and end);

Moderate –Failed to FULLY meet time correction 10 % of the time;

High – Failed to FULLY meet time correction 15 % of the time;

Severe – Failed to FULLY meet time correction more the 15 % of the time
or USE SAME METHOD AS EOP-001-1 R3

Response: Thank you for your comment. The suggestion was not adopted as it would propose assessing compliance based on a cumulative number of violations rather than a single violation - and would not meet FERC's Guideline 4.

BAL-006-1.1 R5 - DISAGREE with moving the two VSL to higher levels. These are AFT accounting and do not affect the BES in real time.

Response: Thank you for your comment. Suggestion not adopted to maintain consistency with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs.

EOP-001-0 R5 - The new VSL's do not represent much improvement. Each of the applicable elements in the attachment would have different impacts on the BES and should not be all lumped together as a % or quantity. USE SAME METHOD AS EOP-001-1 R3, where each VSL points to a particular element, depending on its impact.

Response: Thank you for your comment. The proposed changes are consistent with the levels of non-compliance currently in place and adopting the suggestion would propose a lowering of the levels of non-compliance and a violation of Guideline 1. Suggestion not adopted.

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EOP-001-1 R4 - The new VSL's do not represent much improvement. Each of the applicable elements in the attachment would have different impacts on the BES and should not be all lumped together as a % or quantity. USE SAME METHOD AS EOP-001-1 R3, where each VSL points to a particular element, depending on its impact.

Response: Thank you for your comment. Suggestion not adopted, as proposed changes are consistent with other VSLs and FERC's VSL guidelines.

EOP-001-1 R5 - ORIGINAL VSL's are more comprehensive.

Response: Thank you for your comment. The VSL was modified, but your suggestion was not adopted as it would propose assessing compliance based on a cumulative number of violations rather than a single violation - and would not meet FERC's Guideline 4.

EOP-001-2 R4 - There are 15 elements in Attachment 1-EOP-001-1. Not all elements are applicable to all entities and each element will have a different impact on the BES. Each of these elements should not lumped together equally as they are in the original VSL and proposed VSLs.

Response: Thank you for your comment. Suggestion not adopted, as proposed changes are consistent with other VSLs and FERC's VSL guidelines.

EOP-001-2 R5 - The original VSLs provide more detail and clarification.

Response: Thank you for your comment. The VSL was modified, but your suggestion was not adopted as it would propose assessing compliance based on a cumulative number of violations rather than a single violation - and would not meet FERC's Guideline 4.

EOP-005-1 R1 - Though the original has more clarity then the proposed, disagree with both. The VSL should point to specific elements in the Attachment 1-EOP-005. (See EOP-001-1 R3 and R4)

Response: Thank you for your comment. The VSLs were modified to include more gradation.

Tracy Sliman, Tri-State Generation & Transmission Assoc., Inc.

Comments on VSLs:

Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
FAC-009	R2				To be consistent with the

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Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
					intent of the original VSL, change "...Facility Ratings to all.." to "... Facility Ratings to any ..."
<p>Response: Thank you for your comment. While the exact wording suggested was not adopted, the intent was.</p>					
MOD-010	R1	<p>The use of "appropriate" violates guideline 2b.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p> <p>The basis for the percentage "of the appropriate equipment" is not defined. This is an issue with both the balloted and proposed VSLs</p>	<p>The use of "appropriate" violates guideline 2b.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p> <p>The basis for the percentage "of the appropriate equipment" is not defined. This is an issue with both the balloted and proposed VSLs</p>	<p>The use of "appropriate" violates guideline 2b.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p> <p>The basis for the percentage "of the appropriate equipment" is not defined. This is an issue with both the balloted and proposed VSLs</p>	<p>The use of "appropriate" violates guideline 2b.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p> <p>The basis for the percentage "of the appropriate equipment" is not defined. This is an issue with both the balloted and proposed VSLs</p>
<p>Response: Thank you for your comment. The term "appropriate" was retained for consistency with the language in the requirement. The use of percentages in the proposed changes is consistent with FERC VSL guidelines. Suggestions not adopted.</p>					
MOD-010	R2	<p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p> <p>The basis for the percentage "of the appropriate equipment" is not defined. This is an issue with both the</p>	<p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p> <p>The basis for the percentage "of the appropriate equipment" is not defined. This is an issue with both the balloted</p>	<p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p> <p>The basis for the percentage "of the appropriate equipment" is not defined. This is an issue with both the balloted and proposed</p>	<p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p> <p>The basis for the percentage "of the appropriate equipment" is not defined. This is an issue with both the balloted and proposed</p>

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Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
		<p>balloted and proposed VSLs</p> <p>There is only a 5 day increment between severity levels. What is the reliability impact justification for such a small difference?</p> <p>MOD-012 R2 and MOD-010 R2 are essentially the same. Why are the proposed VSL different?</p>	<p>and proposed VSLs</p> <p>There is only a 5 day increment between severity levels. What is the reliability impact justification for such a small difference?</p> <p>MOD-012 R2 and MOD-010 R2 are essentially the same. Why are the proposed VSL different?</p>	<p>VSLs</p> <p>There is only a 5 day increment between severity levels. What is the reliability impact justification for such a small difference?</p> <p>MOD-012 R2 and MOD-010 R2 are essentially the same. Why are the proposed VSL different?</p>	<p>VSLs</p> <p>There is only a 5 day increment between severity levels. What is the reliability impact justification for such a small difference?</p> <p>MOD-012 R2 and MOD-010 R2 are essentially the same. Why are the proposed VSL different?</p>
<p>Response: Thank you for your comment. The use of percentages in the proposed changes is consistent with FERC VSL guidelines. Suggestion not adopted. The increments for tardiness were changed to 10-day increments for consistency with the VSL guidelines. The VSLs for MOD-012-0 R2 were modified for consistency with the VSLs for MOD-010-0 R2.</p>					
MOD-012	R1	<p>The use of “appropriate” violates guideline 2b.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p> <p>The basis for the percentage “of the appropriate equipment” is not defined. This is an issue with both the balloted and proposed VSLs</p>	<p>The use of “appropriate” violates guideline 2b.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p> <p>The basis for the percentage “of the appropriate equipment” is not defined. This is an issue with both the balloted and proposed VSLs</p>	<p>The use of “appropriate” violates guideline 2b.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p> <p>The basis for the percentage “of the appropriate equipment” is not defined. This is an issue with both the balloted and proposed VSLs</p>	<p>The use of “appropriate” violates guideline 2b.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p> <p>The basis for the percentage “of the appropriate equipment” is not defined. This is an issue with both the balloted and proposed VSLs</p>
<p>Response: Thank you for your comment. The term “appropriate” was retained for consistency with the language in the requirement. The use of</p>					

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Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
percentages in the proposed changes is consistent with FERC VSL guidelines. Suggestions not adopted.					
MOD-012	R2	We believe this is a reasonable VSL. Consideration should be given to using MOD-012 R2 proposed VSL's language in MOD-010 R2 proposed VSLs.	We believe this is a reasonable VSL. Consideration should be given to using MOD-012 R2 proposed VSL's language in MOD-010 R2 proposed VSLs.	We believe this is a reasonable VSL. Consideration should be given to using MOD-012 R2 proposed VSL's language in MOD-010 R2 proposed VSLs.	We believe this is a reasonable VSL. Consideration should be given to using MOD-012 R2 proposed VSL's language in MOD-010 R2 proposed VSLs.
Response: Thank you for your comment. Suggestion not adopted. Instead, the VSLs for MOD-012-0 R2 were modified for consistency with the VSLs for MOD-010-0 R2.					
PRC-001	R4	The use of "major" violates FERC guideline 2b. Recommend removing "... protection systems on major transmission lines and..."	The use of "major" violates FERC guideline 2b. Recommend removing "... protection systems on major transmission lines and..."	The use of "major" violates FERC guideline 2b. Recommend removing "... protection systems on major transmission lines and..."	The use of "major" violates FERC guideline 2b. Recommend removing "... protection systems on major transmission lines and..."
Response: Thank you for your comment. The suggestion was not adopted because the use of "major" is consistent with the language in the requirement itself.					
PRC-009	R2				Recommend changing the entire proposed VSL to: "The responsible entity has not provided the documentation within 145 calendar days after the system event" and eliminating the second paragraph.
Response: Thank you for your comment. Suggestion not adopted because tardiness increments as now modified are consistent with VSL guidelines.					

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Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
TPL-001-0.1	R1	The existing VSLs differentiate the varying importance of each subrequirement. We disagree with assigning all the subrequirements the same level of severity simply to eliminate assigning VSLs to subrequirements.	The existing VSLs differentiate the varying importance of each subrequirement. We disagree with assigning all the subrequirements the same level of severity simply to eliminate assigning VSLs to subrequirements.	The existing VSLs differentiate the varying importance of each subrequirement. We disagree with assigning all the subrequirements the same level of severity simply to eliminate assigning VSLs to subrequirements.	The existing VSLs differentiate the varying importance of each subrequirement. We disagree with assigning all the subrequirements the same level of severity simply to eliminate assigning VSLs to subrequirements.
<p>Response: Thank you for your comment. In this case, the subrequirements contribute unequally to the requirement and it is appropriate to differentiate them accordingly. Suggestion not adopted.</p>					
TPL-002-0	R1	<p>The existing VSLs differentiate the varying importance of each subrequirement. We disagree with assigning all the subrequirements the same level of severity simply to eliminate assigning VSLs to subrequirements.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p>	<p>The existing VSLs differentiate the varying importance of each subrequirement. We disagree with assigning all the subrequirements the same level of severity simply to eliminate assigning VSLs to subrequirements.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p>	<p>The existing VSLs differentiate the varying importance of each subrequirement. We disagree with assigning all the subrequirements the same level of severity simply to eliminate assigning VSLs to subrequirements.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p>	<p>The existing VSLs differentiate the varying importance of each subrequirement. We disagree with assigning all the subrequirements the same level of severity simply to eliminate assigning VSLs to subrequirements.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p>
<p>Response: Thank you for your comment. In this case, the subrequirements contribute unequally to the requirement and it is appropriate to differentiate them accordingly. Suggestion not adopted. The use of percentages in the proposed changes is consistent with FERC VSL guidelines.</p>					

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Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
Suggestion not adopted.					
TPL-003-0		<p>The existing VSLs differentiate the varying importance of each subrequirement. We disagree with assigning all the subrequirements the same level of severity simply to eliminate assigning VSLs to subrequirements.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p>	<p>The existing VSLs differentiate the varying importance of each subrequirement. We disagree with assigning all the subrequirements the same level of severity simply to eliminate assigning VSLs to subrequirements.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p>	<p>The existing VSLs differentiate the varying importance of each subrequirement. We disagree with assigning all the subrequirements the same level of severity simply to eliminate assigning VSLs to subrequirements.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p>	<p>The existing VSLs differentiate the varying importance of each subrequirement. We disagree with assigning all the subrequirements the same level of severity simply to eliminate assigning VSLs to subrequirements.</p> <p>The proposed VSL is more stringent than the Balloted VSL. FERC did not direct NERC to tighten the VSL violation ranges.</p>
<p>Response: Thank you for your comment. In this case, the subrequirements contribute unequally to the requirement and it is appropriate to differentiate them accordingly. Suggestion not adopted. The use of percentages in the proposed changes is consistent with FERC VSL guidelines. Suggestion not adopted.</p>					

J.T. Faust, Consumers Energy

Comments:

Comment 1: BAL-005-0.1b, Rule R.1.3 - The VSL is establishing levels of metering and data accuracy and such metrics should be defined within the standard itself and not **tacked on** as a VSL. We have seen other standards where information not contained within the body of the standard (such as attachments) conflict with intent of the standard which has resulted in confusion and perhaps unnecessary and unreasonable compliance processes.

Response: Thank you for your comment. The intent of the comment is unclear, as VSLs for R1.3 are proposed to be deleted.

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Brent Ingebrigtsen, E.ON U.S.

Comments on VSLs:

STANDARD	REQUIREMENTS	LOWER	MODERATE	HIGH	SEVERE
BAL-002-2	R2.1 – 2.6				N/A (no VSLs for rolled up sub requirements)
Response: Thank you for your comment. Suggestion adopted.					
BAL-003-0.1b	R2	N/A (If R2 is binary, severe is the correct logic)			
Response: Thank you for your comment. Intent of comment unclear, as R2 is not binary. Suggestion not adopted.					
BAL-00300.1b	R2.1 & R2.2	N/A (sub-requirements are explanatory)			
Response: Thank you for your comment. Suggestion adopted.					
BAL-005-0.1b	R1.1	N/A	N/A	N/A	The Generator Operator with generation facilities operating in an Interconnection failed to ensure that those generation facilities were included within metered boundaries of a Balancing Authority Area. (Proposed VSLs use percentages which seem inconsistent with other VSL changes)
Response: Thank you for your comment. The VSLs for the subrequirements of R1 have been modified to be rolled up into the VSLs for R1.					
BAL-005-0.1b	R1.2	N/A	N/A	N/A	The Transmission Operator with transmission facilities operating in an

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					Interconnection failed to ensure that those transmission facilities were included within metered boundaries of a Balancing Authority Area. (Proposed VSLs use percentages which seems inconsistent with other VSL changes)
Response: Thank you for your comment. The VSLs for the subrequirements of R1 have been modified to be rolled up into the VSLs for R1.					
BAL-005-0.1b	R1.3	N/A	N/A	N/A	The Load-Serving Entity with load operating in an Interconnection failed to ensure that those loads were included within metered boundaries of a Balancing Authority Area. (Proposed VSLs use percentages which seems inconsistent with other VSL changes) Is the percent based upon the number of loads or the aggregate quantity (MW) of loads?
Response: Thank you for your comment. The VSLs for the subrequirements of R1 have been modified to be rolled up into the VSLs for R1.					
BAL-005-0.1b	R6		N/A		The Balancing Authority failed to calculate ACE as specified in the requirement, (If BA fails to calculate ACE for 30 minutes, it cannot be calculating as per the requirement).
Response: Thank you for your comment. VSL modified for clarification, but remains graded,					

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BAL-005-0.1b	R12	N/A	N/A	N/A	The Balancing Authority failed to include all Tie Line flows with Adjacent Balancing Authority Areas in the ACE calculation.
Response: Thank you for your comment. Proposed changes and the gradation by percentage are consistent with VSL guidelines. Suggestion not adopted.					
BAL-006-1.1	R2	N/A	N/A	The Balancing Authority failed to include all AC tie lines that connect to its Adjacent Balancing Authority Areas in its Inadvertent Interchange account. OR Failed to take into account interchange served by jointly owned generators.	The Balancing Authority failed to include all AC tie lines that connect to its Adjacent Balancing Authority Areas in its Inadvertent Interchange account. AND Failed to take into account interchange served by jointly owned generators.
Response: Thank you for your comment. Proposed changes and the gradation by percentage are consistent with VSL guidelines. Suggestion not adopted.					
BAL-006-1.1	R4, R4.1.1, 4.1.2, 4.3, and 4.4	N/A	N/A	N/A	N/A
Response: Thank you for your comment. Suggestion adopted.					
BAL-006-1.1	R5	Adjacent Balancing Authorities that could not mutually agree upon their respective Net Actual Interchange or Net Scheduled Interchange quantities, by the 15th calendar day of the following month, submitted a report to their respective Regional Reliability Organizations Survey Contact describing the nature	Adjacent Balancing Authorities that could not mutually agree upon their respective Net Actual Interchange or Net Scheduled Interchange quantities by the 15th calendar day of the following month, failed to submit a report to their respective Regional Reliability Organizations Survey Contact describing the nature and the cause of	N/A	N/A

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		and the cause of the dispute but failed to provide a process for correcting the discrepancy.	the dispute as well as a process for correcting the discrepancy.		
<p>Response: Thank you for your comment. Per VSL guidelines, at least one level of VSLs must be designated as severe. Suggestion not adopted.</p>					
EOP-001-1	R1				The Balancing Authority failed to demonstrate the existence of the necessary operating agreement with one of the adjacent Balancing Authorities. OR The Balancing Authority failed to demonstrate sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies.
<p>Response: Thank you for your comment. Proposed changes and the gradation by percentage are consistent with VSL guidelines. Suggestion not adopted.</p>					
EOP-001-1	R2	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-requirements.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-requirements.	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-requirements.	The Transmission Operator or Balancing Authority has failed to comply with four (4) of the sub-requirements.
<p>Response: Thank you for your comment. "Sub-components" has been changed to "sub-requirements."</p>					
EOP-001-1	R3	The Transmission Operator or Balancing Authority failed to comply with sub-requirement R3.4.	The Transmission Operator or Balancing Authority failed to comply with sub-requirement R3.3.	The Transmission Operator or Balancing Authority failed to comply with either sub-requirement R3.1 or sub-requirement R3.2.	The Transmission Operator or Balancing Authority failed to comply with two or more of the sub-requirements identified for R3. OR The Transmission Operator or Balancing Authority did not have

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					emergency plans that were intended to enable it to mitigate operating emergencies.
<p>Response: Thank you for your comment. "Sub-components" has been changed to "sub-requirements."</p>					
EOP-001-1	R5				<p>The Transmission Operator or Balancing Authority failed to complete an annual review and update each of its emergency plans appropriately.</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>Response: Thank you for your comment. Suggestion not adopted because VSL was modified from a binary VSL into two VSLs (High and Severe) based on other stakeholder comments.</p>					
EOP-001-1	R6	The Transmission Operator or Balancing Authority failed to comply with sub- requirement R6.4.	The Transmission Operator or Balancing Authority failed to comply with sub- requirement R6.3.	The Transmission Operator or Balancing Authority failed to comply with either sub- requirement 6.1 or sub- requirement 6.2.	The Transmission Operator or Balancing Authority failed to comply with two or more of the sub- requirements identified for R6.
<p>Response: Thank you for your comment. "Sub-components" has been changed to "sub-requirements."</p>					
EOP-001-2	R1				The Balancing Authority failed to demonstrate the existence of the necessary operating agreement with one of the adjacent

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					Balancing Authorities. OR The Balancing Authority failed to demonstrate sufficient emergency energy assistance agreements to mitigate reasonably anticipated energy emergencies.
Response: Thank you for your comment. Proposed changes and the gradation by percentage are consistent with VSL guidelines. Suggestion not adopted.					
EOP-001-2	R2	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-requirements.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-requirements.	N/A	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-requirements.
Response: Thank you for your comment. "Sub-components" has been changed to "sub-requirements."					
EOP-001-2	R3	The Transmission Operator or Balancing Authority failed to comply with sub-requirement R3.4.	The Transmission Operator or Balancing Authority failed to comply with sub-requirement R3.3	The Transmission Operator or Balancing Authority has failed to comply with either sub-requirement R3.1 or sub-requirement R3.2.	The Transmission Operator or Balancing Authority failed to comply with two or more of the sub-requirements identified for R3. OR The Transmission Operator or Balancing Authority did not have emergency plans that were intended to enable it to mitigate operating emergencies
Response: Thank you for your comment. "Sub-components" has been changed to "sub-requirements."					
EOP-001-2	R5				The Transmission Operator or Balancing Authority failed to complete an annual review and update each of its emergency plans appropriately.

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					OR 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.
Response: Thank you for your comment. Suggestion not adopted because VSL was modified from a binary VSL into two VSLs (High and Severe) based on other stakeholder comments.					
EOP-001-2	R6	The Transmission Operator or Balancing Authority failed to comply with sub- requirement R6.4.	The Transmission Operator or Balancing Authority failed to comply with sub- requirement R6.3.	The Transmission Operator or Balancing Authority failed to comply with either sub- requirement R6.1 or sub- requirement R6.2.	The Transmission Operator or Balancing Authority failed to comply with two or more of the sub- requirements identified for R6.
Response: Thank you for your comment. "Sub-components" has been changed to "sub-requirements."					
EOP-004-1	R3	N/A	N/A	N/A	N/A
Response: Thank you for your comment. The explanation indicating that the VSLs should be deleted was not intended for this requirement. Suggestion not adopted.					
EOP-004-1	R4				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.
Response: Thank you for your comment. As explained in the explanation attached to the posted comments, VSLs are not appropriate for this requirement. Suggestion not adopted.					

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FAC-001-0	R2				The responsible entity's facility connection requirements do not address one or more of the sub-requirements. (R2.1.1 to R2.1.16)
Response: Thank you for your comment. Suggestion adopted.					
FAC-001-0	R2.1, R2.1.1-R2.1.16	N/A	N/A	N/A	N/A
Response: Thank you for your comment. The VSLs for the subrequirements that were rolled up into the parent requirement will be marked N/A.					
FAC-010-2.1	R1.1,1.2,1.3				N/A
Response: Thank you for your comment. The VSLs for the subrequirements that were rolled up into the parent requirement will be marked N/A.					
FAC-010-2.1	R2.1 – R2.6.1				N/A
Response: Thank you for your comment. The VSLs for the subrequirements that were rolled up into the parent requirement will be marked N/A.					
TOP-003-1	R1	The responsible entity provided the required information after 1200 Central Standard Time for the Eastern Interconnection and 1200 Pacific Standard Time for the Western Interconnection of the previous day.			
Response: Thank you for your comment. The VSL as written is consistent with other VSLs. Suggestion not adopted.					

Other Comments:

Comments: VSLs based upon percentage increments should not be applicable unless there are a reasonable number of variables under evaluation. Applying 5% VSL increments to small entities, or where there are few variables to evaluate, will result in higher level (often Severe) VSLs. What is the justification for 5% increments? Are such small increments meaningful?

Response: Thank you for your comment. The 5% increments are recommended by the VSL guidelines.

The use of percentages in VSLs does not add clarity. How percentages will be calculated and over what period of time is not known. For example, under BAL-005-0.1b R12 if a BA has 5 tie lines and one is not captured for one hour, would that result in a 20% violation, or would the evaluation period be 24 hours and the percentage be 0.83%?

Response: Thank you for your comment. The use of percentages is recommended by the VSL guidelines.

For proposed sub-requirements VSLs that are rolled up to the main requirement, it is not clear if the proposed language will make the sub-requirements N/A. An example is BAL-006-1.1. The proposed language rolls up the VSLs to R4, but does not propose changing R4.1, R4.1.1, R4.1.2, R4.3, and R4.4 SEVERE to N/A. This exposes registered entities to multiple violations.

Response: Thank you for your comment. For all subrequirement VSLs that are rolled up into the main requirement, the subrequirement VSLs will become N/A.

With respect to BAL-006-1.1 R5, the requirements are for the after the fact time horizon. A violation would have no impact on real-time reliable operations and the VSL should therefore remain Lower and Moderate.

Response: Thank you for your comment. Suggestion not adopted to maintain consistency with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs.

For EOP-001-1 R1, the NERC Interpretation for this requirement under EOP-001-0 does not require a BA to have agreements with all adjacent Balancing Authorities. The interpretation only requires a BA to have at least one agreement. Therefore, the proposed VSLs are inconsistent with the interpretation that has been approved by the ballot body.

Response: Thank you for your comment. The subject interpretation has not been approved and filed with FERC, however the draft interpretation does clarify that it isn't the number of BAs that is important, rather it is that there is sufficient emergency assistance available to meet reasonably anticipated emergencies. The VSLs were modified as follows:

Lower and Moderate: N/A

High: The Balancing Authority had operating agreements with adjacent Balancing Authorities, but the agreements did not contain provisions for emergency assistance from remote Balancing Authorities.

Severe: The Balancing Authority did not have any operating agreements with adjacent Balancing Authorities.

OR

The Balancing Authority had operating agreements with adjacent Balancing Authorities, but the agreements did not include any provisions for emergency assistance.

For EOP-001-1 R5 Adding “failure to provide evidence” expands R5. Evidence is provided if requested.

Response: Thank you for your comment. The language in the VSL is consistent with the language in the requirement. Suggestion not adopted.

For EOP-004-1 R3, the explanation for this proposed VSL states “VSLs for this requirement are inappropriate.” If that is true, then no VSLs are needed for this requirement or EOP-004-1 R1.

Response: Thank you for your comment. That explanation was a mistake.

For FAC-014-2 R1, the language of the proposed VSL is inconsistent with language of R1. R1 only addresses RC responsibilities; it says nothing about the TOP.

Response: Thank you for your comment. That requirement was modified and your suggestion has been adopted.

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Andy Tillery, Southern Company

Comments on VSLs:

Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
EOP-005-2	R16	None	Language for timeframe “did not supply...for 60 days to 90 calendar days” can be confusing. If supplied on day 60 does that constitute a Moderate or High severity level? Suggest changing language for clarity and consistency to “did not supply...as requested <u>within</u> 89 calendar days of the request.”	Same “ <u>within</u> 119 calendar days”	For consistency: “for 120 <u>calendar</u> days”
<p>Response: Thank you for your comment. “Calendar” was added to the indicated phrase for the Severe VSL. The other suggestions were not adopted to preserve consistency with other VSLs.</p>					
FAC-009-1	R2	None	None	None	Suggest striking the second half condition after ‘OR’ “The responsible entity did not provide its Facility Ratings to all of the requesting entities.” This statement provides no additional meaning and is superfluous to the first half condition.
<p>Response: Thank you for your comment. The VSL DT believes the second condition is distinct from the first. Suggestion not adopted.</p>					

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Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
MOD-010-0	R2	<p>This requirement is regarding the responsiveness of the entity to a schedule or request rather than the completeness of the data provided. Completeness of the data is covered in R1.</p> <p>Suggest striking the first half condition for schedules regarding completeness and instead base on responsiveness</p> <p>“The responsible entity is from 1 to 10 calendar days late providing the scheduled data”</p> <p>OR</p> <p>Maintain second half condition for requests without schedule.</p>	<p>Same</p> <p>“The responsible entity is from 11 to 20 calendar days late providing the scheduled data.”</p> <p>OR</p> <p>Maintain second half condition for requests without schedule.</p>	<p>Same</p> <p>“The responsible entity is from 21 to 30 calendar days late providing the scheduled data.”</p> <p>OR</p> <p>Maintain second half condition for requests without schedule.</p>	<p>Same</p> <p>“The responsible entity is more than 30 calendar days late providing the scheduled data.”</p> <p>OR</p> <p>Maintain second half condition for requests without schedule.</p>
<p>Response: Thank you for your comment. The requirement covers both the completeness of the data and the responsiveness of the entity to a schedule, so both should be included in the VSL. Suggestion not adopted.</p>					
MOD-012-0	R2	<p>Deadlines for second half condition on requested (not scheduled) data should be revised to be</p>	<p>Same</p>	<p>Same</p>	<p>Same</p>

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Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
		consistent with the timeframes established in MOD-010-0 R2			
<p>Response: Thank you for your comment. Suggestion adopted. The VSLs for MOD-012-0 R2 were modified for consistency with the VSLs for MOD-010-0 R2.</p>					
NUC-001-2	R4	<p>R4.2 & R4.3 reflect real time operation, R4.2 being considered most important. R4.1 is operation planning horizon. Suggest making distinctions between the subrequirements and breaking across multiple severity levels.</p> <p>Lower VSL revision: The responsible entity did not comply with sub-requirement R4.1 but is compliant with subrequirements R4.2 and R4.3.</p>	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 sub-requirement R4.2 but is compliant with subrequirements R4.1 and R4.3.	The responsible entity did not comply with any of the sub-requirements of R4.
<p>Response: Thank you for your comment. The VSLs have been modified to include Moderate, High, and Severe VSLs that better acknowledge the distinctions among the subrequirements.</p>					
NUC-001-2	R6	None	None	An outage of an element important to safe operation & shutdown of a nuclear unit is more critical than a maintenance activity which does not cause or contribute to an outage of such an element. Suggest	The responsible entity had <u>an outage</u> which affected an NPIR and failed to coordinate per the Agreements developed in accordance with this standard.

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Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
				<p>creating the distinction between High & Severe VSLs.</p> <p>The responsible entity had a <u>maintenance activity</u> which affected an NPIR and failed to coordinate per the Agreements developed in accordance with this standard.</p>	
<p>Response: Thank you for your comment. The VSL DT maintains that maintenance activities and outages have the potential for equal impact on an NPIR. Suggestion not adopted.</p>					
TOP-003-1	R2	The responsible entity failed to plan or coordinate 5% or less of the scheduled outages of the system voltage regulating equipment with affected Balancing Authorities and Transmission Operators as required.	The responsible entity failed to plan or coordinate > 5% and ≤ 10% of the scheduled outages of the system voltage regulating equipment with affected Balancing Authorities and Transmission Operators as required.	The responsible entity failed to plan or coordinate > 10% and ≤ 15% of the scheduled outages of the system voltage regulating equipment with affected Balancing Authorities and Transmission Operators as required.	The responsible entity failed to plan or coordinate more than 15% of the scheduled outages of the system voltage regulating equipment with affected Balancing Authorities and Transmission Operators as required.
<p>Response: Thank you for your comment. Suggestion not adopted as it would propose assessing compliance based on a cumulative number of violations rather than a single violation and would not meet FERC's Guideline 4.</p>					
TOP-003-1	R3	The responsible entity failed to plan and coordinate 5% or less of the scheduled outages of the telemetering and	The responsible entity failed to plan and coordinate > 5% and ≤ 10% of the scheduled outages of telemetering and control	The responsible entity failed to plan and coordinate > 10% and ≤ 15% of the scheduled outages of telemetering	The responsible entity failed to plan and coordinate more than 15% of the scheduled outages of telemetering and control

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Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
		control equipment and associated communication channels between the affected areas.	equipment and associated communication channels between the affected areas.	and control equipment and associated communication channels between the affected areas.	equipment and associated communication channels between the affected areas.
<p>Response: Thank you for your comment. Suggestion not adopted as it would propose assessing compliance based on a cumulative number of violations rather than a single violation and would not meet FERC's Guideline 4.</p>					
VAR-001-1	R.31	The use of the minimum quantity in conjunction with the limiting percentage is ambiguous and creates potential confusion. What happens when the minimum quantity represents more than the limiting percentage for that VSL, but yet does not meet the minimum quantity for the next severity level? Suggest using quantities or percentages, but not both.	Same	Same	Same
<p>Response: Thank you for your comment. The VSL text was revised to remove possible conflict arising from the use of minimum quantities in conjunction with the limiting percentages. The VSLs were revised to retain only the gradation by percentages.</p>					

Other Comments:

Some of the measures in the VSLs still revolve around percentages achieved (95%, 90%, 85%, ...) while some have been revised to revolve around percentages missing (5%, 10%, 15%, ...). This is surely due to the different perspectives of the respective drafting teams. However, this should be revisited and a clear direction provided on how those measures will be listed going forward in order to provide consistency to all VSLs and limit potential interpretation confusion.

Response: Thank you for your comment. The 5% increments are recommended by the VSL guidelines, but no guideline exists about percentages achieved versus percentages missing.

While we understand the need to remove ambiguous measures such as “some” or “many” from the VSLs, it is of concern that those VSLs which had quantifiable measures already attached, are having those measures changed by what are in some cases considerable amounts. We also understand that for the sake of consistency, similar quantitative measures should be used unless otherwise justified due to the nature of the requirement. However, we feel that a broad sweep should have only addressed those VSL measures that were not previously quantifiable or ambiguous, and that any change which further limits or increases the quantifiable measures be taken up as revisions to each standard by the SDT, and only after some clear guidelines have been set to aid in consistency among the many SDTs.

Response: Thank you for your comment.

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Steven Rueckert, Western Electricity Coordinating Council

Comments on VSLs:

Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
BAL-002-0	R4	Entity Failed to meet the Disturbance Recovery Criteria within the Disturbance Recovery Period for one (1) Reportable Disturbance	Entity Failed to meet the Disturbance Recovery Criteria within the Disturbance Recovery Period for two (2) Reportable Disturbances	Entity Failed to meet the Disturbance Recovery Criteria within the Disturbance Recovery Period for three (3) Reportable Disturbances	Entity Failed to meet the Disturbance Recovery Criteria within the Disturbance Recovery Period for four (4) or more Reportable Disturbances
<p>The proposed VSLs identified above and the following statement were developed from a strict reading of the existing VSLs and the proposed revisions. BAL-002-0 R4 Comment: Under both the existing VSL and the proposed VSL, any entity with more Reportable Disturbances fares better than an entity with fewer reportable disturbances. For example, an entity that doesn't meet the criterion for 1/1 reportable disturbances has a Severe VSL, whereas an entity that doesn't meet the discovery criterion for 1/10 reportable disturbances has a Lower VSL. WECC's proposed change fixes this problem. WECC proposes that if an entity fails to meet the disturbance recovery criterion for X number of reportable disturbances, a Severe VSL is appropriate. WECC's suggestion above for X (1,2,3,4) can be adjusted to 1-2, 3-4, 5-6, 7-8, or greater scales, if a greater scale is more appropriate.</p> <p>I believe that the words of the existing VSLs as well as the proposed VSLs fail to capture the actual calculation method identified in the standard for the percent recovery. The standard identifies the equations for calculating percent recovery (Ri). The standard then goes on to state that average percent recovery is the arithmetic average of all the calculated Ri's for Reportable Disturbances during a given quarter. The existing and proposed VSLs seem to indicate that the percentages identified in the VSLs are calculated based on the number of events that the BA or RSG failed to meet 100% recovery. I believe the intent is that if a BA had 5 reportable events, and their Ri for the 5 events was 95%, 100%, 100%, 95% , and 100%, then their arithmetic average of all the calculated Ri's for Reportable Disturbances would be 98%. However, I believe that the wording of the existing VSLs and the proposed VSLs would have the calculation be 3/5 (met 100% 3 out of 5 times) or 60%. I don't believe this is the intent of the standard.</p> <p>Based on our understanding of the standard the following proposals are offered</p>					
		The Reserve Sharing Group's or Balancing Authority's arithmetic average of all the calculated Ri's for Reportable Disturbances during a given quarter	The Reserve Sharing Group's or Balancing Authority's arithmetic average of all the calculated Ri's for Reportable Disturbances during a given quarter was	The Reserve Sharing Group's or Balancing Authority's arithmetic average of all the calculated Ri's for Reportable Disturbances during a given quarter was	The Reserve Sharing Group's or Balancing Authority's arithmetic average of all the calculated Ri's for Reportable Disturbances during a given quarter was

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Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
		was less than 100% but greater than or equal to 95%.	less than 95% but greater than or equal to 90%.	less than 90% but greater than or equal to 85%.	less than 85%
<p>The proposal above uses the same percentages as in the proposed NERC VSLs, but reflects an arithmetic average of percentage recovery rather than a percentage of events that did not meet the DCS requirement. Additionally, the language that just reflects failure to meet the DCS requirement does not recognize the different between an entity that had a 98% recovery and an entity that had 48% recovery. The NERC proposal as worded would make it extremely difficult, or impossible to achieve any VSL except severe if an entity had only a few reportable events. An entity that only had 5 reportable events would be all the way down to 80% (or failed to meet 20%) of the events. It would take 20 reportable events before an entity that failed to meet only one to have a Lower VSL.</p>					
<p>Response: Thank you for your comment. The VSLs were written according to FERC and NERC VSL guidelines and the VSL DT finds them clearer as written. Suggestion not adopted.</p>					
BAL-004-0	R3		The Balancing Authority participated in more than 50% of the requested Time Error Correction.	The Balancing Authority participated in less than 50% of the requested Time Error Correction.	The Balancing Authority failed to participate in the requested Time Error Correction.
<p>Response: Thank you for your comment. The VSL was not adjusted to reflect a gradation by the number of violations over a calendar year as proposed by some stakeholders as that proposal would violate FERC Guideline 4. Suggestion not adopted.</p>					
EOP-001-1	R1	More than 95%, but less than 100% . . .	More than 90%, but not more than 95% . . .	More than 85%, but not more than 90% . . .	Less than 85% or less . . .
<p>The proposed ranges are confusing as drafted. The referencing of the percentage of BAs and percentage of agreements that contain provisions for emergency assistance is confusing. Additionally, the application of the percentages on the number of adjacent entities is problematic. Many BAs have only a few adjacent BAs. Because of this, failure to have operating agreements in place with only one entity would result in a Severe violation because of the percentage calculation. It also looks like the percentages in the Moderate and High proposals don't account for between 85% and 90% and the bottom half of the proposed Moderate VSL has an erroneous percentage (75%).</p> <p>A potential alternative is suggested below.</p>					

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Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
		<p>The Balancing Authority had operating agreements with all but one (1) adjacent BAs</p> <p>OR</p> <p>All but one (1) of the Balancing Authority's operating agreements contain provisions for emergency assistance</p>	<p>The Balancing Authority had operating agreements with all but two (2) adjacent BAs</p> <p>OR</p> <p>All but two (2) of the Balancing Authority's operating agreements contain provisions for emergency assistance</p>	<p>The Balancing Authority had operating agreements with all but three (3) adjacent BAs</p> <p>OR</p> <p>All but three (3) of the Balancing Authority's operating agreements contain provisions for emergency assistance</p>	<p>The Balancing Authority had operating agreements with all but four (4) adjacent BAs or the Balancing Authority did not have operating agreements with any adjacent BAs</p> <p>OR</p> <p>All but four (4) of the Balancing Authority's operating agreements contain provisions for emergency assistance or none of the Balancing Authority's operating agreements contain provisions for emergency assistance</p>
<p>Response: Thank you for your comment. The VSLs were revised to mitigate a gap in the percentage gradation. The team recognizes concerns with the VSL consistency with an on-going interpretation of the standard related to requirement R1. However, since the interpretation is not yet NERC BoT approved the use of percentage gradation remains.</p>					
EOP-005-1	R1	<p>The Transmission Operator failed to include one (1) of the elements . . .</p>	<p>The Transmission Operator failed to include two (2) of the elements . . .</p>	<p>The Transmission Operator failed to include three (3) of the elements . . .</p>	<p>The Transmission Operator failed to include four (4) or more of the elements . . .</p> <p>Or</p> <p>The Transmission Operator does not have a Restoration Plan</p>
<p>Response: Thank you for your comment. The VSLs were revised to include further gradation of severity levels. The VSL language was also revised to better match the requirement language.</p>					

Consideration of Comments on Project 2007-23 — Violation Severity Levels

Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
FAC-001-0	R2	The Transmission Owner's facility connection requirements failed to address one (1) of the subcomponents.	The Transmission Owner's facility connection requirements failed to address two (2) of the subcomponents.	The Transmission Owner's facility connection requirements failed to address three (3) of the subcomponents.	The Transmission Owner's facility connection requirements failed to address four (4) or more of the subcomponents. Or The Transmission Owner does not have facility connection requirements.
<p>Agree with an increase in current severity level, however not at the rate proposed. For example, the omission of 2 subcomponents is currently "Lower", proposal would make "Severe". The omission of a single subcomponent out of 16 should not be severe.</p>					
<p>Response: Thank you for your comment. Suggestion adopted. The rollup of these VSLs was modified to replace the binary VSL with a set of graduated VSLs.</p>					

Other Comments:

WECC believes that any and all changes proposed to the existing VSL levels should provide the Regional Entity more discretion, rather than less discretion, to determine the appropriate VSL level depending on the specific facts and circumstances surrounding the Alleged Violation.

There will always be varying levels of non-compliance and culpability associated with each of the Reliability Standards. Limiting a Reliability Standard's VSL options to only Severe (unless it is for a true binary requirement), limits the Regional Entity's ability to accurately characterize the severity of the violation. It also results in treating entities with varying levels of non-compliance the same.

Consequently, with the exception of truly binary requirements, if a violation has only one VSL, there is little flexibility for the Regional Entity to determine an appropriate penalty that reflects the facts and circumstances and continue to be consistent with the Base Penalty range.

For example, if an entity is required to include various components or elements in any given plan or document, WECC believes that an entity that misses all or most elements should have a higher severity level than an entity that misses only one or two. Such a VSL structure would give Regional Entities greater ability to differentiate between violations and assess an appropriate penalty within the Base Penalty ranges.

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In short, excluding binary requirements, for every Reliability Standard there will be varying degrees of non-compliance that should be reflected by a VSL Matrix. WECC believes that to restrict a VSL to only Severe, defeats the purpose of having a VSL Matrix.

Response: Thank you for your comment.

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Margaret Powell, Constellation Energy

Comments on VSLs:

Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
BAL-005	R6				The BAs AGC failed to compare the total NAI to total NSI plus bias while synchronized in calculating ACE OR the BA failed to notify the RC that the BA was unable to calculate ACE for 30 minutes or longer.
Response: Thank you for your comment. The VSL DT Severe VSL for clarity and understanding per stakeholder feedback, but your suggestion was not adopted.					
	R1	EOP-001: There have been interpretations that indicate that an agreement is not required with all adjacent BAs. The VSL would contradict the interpretation.			
Response: Thank you for your comment. The VSLs were revised to mitigate a gap in the percentage gradation. The team recognizes concerns with the VSL consistency with an on-going interpretation of the standard related to requirement R1. However, since the interpretation is not yet NERC BoT approved the use of percentage gradation remains.					
EOP-001:	R3	EOP-001: For consistency with other modifications, these VSLs should not identify specific sub-requirements, but should maintain the format where the severity level is determined by the number of sub-requirements that have been overlooked.			
Response: Thank you for your comment. In this case, the subrequirements contribute unequally to the requirement and it is appropriate to differentiate them accordingly. Suggestion not adopted.					
EOP-001:	R6	For consistency with other modifications, these VSLs should not identify specific sub-requirements, but should maintain the format where the severity level is determined by the number of sub-requirements that have been overlooked.			
Response: Thank you for your comment. In this case, the subrequirements contribute unequally to the requirement and it is appropriate to differentiate them accordingly. Suggestion not adopted.					
PER-005:	R1	For consistency with other modifications, these VSLs should not identify specific sub-requirements, but should maintain the format where the severity level is determined by the number of sub-requirements that have been			

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Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
		overlooked.			
<p>Response: Thank you for your comment. In this case, the subrequirements contribute unequally to the requirement and it is appropriate to differentiate them accordingly. Suggestion not adopted.</p>					
COM-001	R3	N/A	N/A	Agree with change to remove high VSL	Agree with the VSL as written. Follows the guidelines established.
<p>Response: Thank you for your comment.</p>					

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ISO/RTO Council’s Standards Review Committee

Comments on VSLs:

BAL-002-0	R2	<p>The proposal modifies the existing VSLs on the main requirement arbitrarily without explanation. For example, missing two-three sub-requirements is currently a Moderate VSL and missing four or five is a High VSL. The proposal would make missing three sub-requirement a High VSL and four sub-requirements a Severe VSL. The only explanation given is that NERC incorporated missing sub-requirements into the main requirement VSL per their August 10, 2009 filing. While the filing does provide justification to incorporate missing sub-requirements into the VSLs for the main requirement, there is nothing in the filing that indicates each successive level of VSL will only contain one missing sub-requirement. The balloted language for the VSLs for the main requirement should be retained.</p>
<p>Response: Thank you for your comment. Proposed changes to the VSLs are consistent with other VSLs and FERC and NERC VSL guidelines. Suggestion not adopted.</p>		
BAL-002-0	R4	<p>The BA is not mentioned in the VSL whereas it is mentioned in the requirement. Furthermore, the gradation of VSLs was modified without justification. The present VSLs divide the non-performance based on 10% increments. The proposal makes non-performance more severe by changing the levels to 5%. The 10% levels should be retained without further justification for their modification.</p> <p>The use of percentages, without further qualification, creates a potential arbitrary and unreasonable outcome where, for example, a Balancing Authority or Reserve Sharing Group with a single DCS failure could be penalized more severely than an entity with DCS failures simply based on the overall number of events. Some recognition of this potential inequity must be incorporated into the VSL.</p>
<p>Response: Thank you for your comment. The VSL DT has added “Balancing Authority” to the VSLs to maintain consistency with the language in the requirement. Otherwise, the VSLs were written according to FERC and NERC VSL guidelines and the VSL DT finds them clearer as written. Suggestion not adopted.</p>		
BAL-002-0	R5	<p>The use of percentages, without further qualification, creates a potential arbitrary and unreasonable outcome where, for example, a Balancing Authority or Reserve Sharing Group with a single DCS failure could be penalized more severely than an entity with DCS failures simply based on the overall number of events. Some recognition of this potential inequity must be incorporated into the VSL.</p>
<p>Response: Thank you for your comment. The 5% increment is recommended by the VSL guidelines. Suggestion not adopted.</p>		
BAL-004-0	R3	<p>Insert “when requested” after each occurrence of “Time Error Correction”.</p>

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Response: Thank you for your comment. Suggestion adopted.		
BAL-005-0.1b	R1.1, R1.2 & R1.3	<p>These proposed changes are not consistent with the principle of incorporating the VLSs of the sub-requirements into the main requirement. We recognize that the sub-requirements are in fact distinct requirements that apply to different entities, but that notwithstanding, we prefer to maintain a consistent VSL structure. They should be “OR’ed” together.</p> <p>While it is recognized that R1.1 is written with respect to “generating facilities,” the use of a percentage and generating facilities ignores the relative impact of excluding larger facilities from smaller facilities. To better align the impact of the violation, R1.1 should refer to “the capacity of those generating facilities....” This same concept applies for R1.2 and R1.3.</p>
Response: Thank you for your comment. Suggestion adopted. The subrequirement VSLs have been rolled up into the parent requirement.		
BAL-005-0.1b	R4	Change “is” to “was”.
Response: Thank you for your comment. Suggestion adopted.		
BAL-005-0.1b	R6	The Severe VSL is confusing at best, and illogical, at worst. If the BA is unable to calculate ACE for more than 30 minutes, it is not clear what would be the significance of the method it attempted to use and why that would cause an otherwise Lower VSL to be promoted to Severe. The fact still remains that the BA was unable to calculate ACE for more than 30 minutes and did not inform the RC.
Response: Thank you for your comment. The Severe VSL was revised for clarity and understanding based on stakeholder feedback.		
BAL-005-0.1b	R8	The requirement is to ensure data acquisition and ACE calculation occur every six seconds. The proposed VSLs do not include data acquisition.
Response: Thank you for your comment. Suggestion adopted for consistency with the requirement language.		
BAL-005-0.1b	R11	The High VSL does not reflect the requirement for agreement between BAs. We view this as essential since it is a

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		safeguard against misunderstanding of what the ramp rates should be.			
Response: Thank you for your comment. Suggestion adopted.					
COM-001-1.1 Change proposed to more closely match the requirement.	R3				The responsible entity failed to provide a means to coordinate telecommunications among its respective areas including the ability to assisting in the investigation and recommending of solutions to telecommunications problems within the area and with other areas.
Response: Thank you for your comment. Suggestion adopted for consistency with language in the requirement.					
EOP-001-0	R5	Leave as balloted. There is no justification provided for changing from the percentages in the VSLs to integer numbers of the number elements in the attachment missing. There is nothing in the June 19, 2008 FERC order on VSLs that gives any indication that using integer numbers over the percentages balloted is necessary.			
Response: Thank you for your comment. The suggestion was not adopted as it would propose a lowering of the VSLs currently in place, a violation of FERC's VSL Guideline 1.					
EOP-001-1	R1	Leave as balloted. These VSLs do not reflect what is needed for reliability and the proposed VSLs raise the bar unnecessarily. It is not uncommon to have regulatory restrictions on whom an entity can sell their energy to. For example, there are several federally owned utilities that are prevented from having agreements to sell emergency energy to their adjacent BAs by federal law unless they are fit specifically within a group identified within that law. Often these are small entities. Their adjacent BAs are usually still able to procure sufficient emergency energy resources because they may be adjacent to a BA that is much larger that will provide more than ample access to emergency energy reserves. Thus, the size of the BA relative to its adjacent BAs is extremely important. A 500 MW BA may have 10 adjacent BA that are similar in size and one that is 10,000 MW. One agreement with the large BA will meet the intent of the requirement but the VSLs as written would imply that BA would be in a Severe violation of the requirement.			
Response: Thank you for your comment. The VSLs were revised to mitigate a gap in the percentage gradation. The team recognizes concerns with the VSL consistency with an on-going interpretation of the standard related to requirement R1. However, since the interpretation is not yet NERC BoT approved the use of percentage gradation remains.					
EOP-001-1	R3	Remove the balloted VSLs for the sub-requirements and leave the balloted VSLs for the main requirement. No justification is given for why sub-requirements are given relative priorities or deviating from the number of sub-			

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		requirements violated approach. Furthermore, no justification is given for why missing three requirements should be moved from a High VSL to a Severe VSL.			
Response: Thank you for your comment. The VSLs for the subrequirements will be removed. In this case of the currently proposed parent requirement, the subrequirements contribute unequally to the requirement and it is appropriate to differentiate them accordingly. Suggestion not adopted.					
EOP-001-1	R5	The Transmission Operator or Balancing Authority failed to provide a copy of one of its updated emergency plans to its Reliability Coordinator or one of its neighboring Transmission Operators or Balancing Authorities.	The Transmission Operator or Balancing Authority failed to provide a copy of one of its updated emergency plans to two of the following: its Reliability Coordinator and neighboring Transmission Operators or Balancing Authorities.	The Transmission Operator or Balancing Authority failed to provide a copy of one of its updated emergency plans to three of the following: its Reliability Coordinator and neighboring Transmission Operators or Balancing Authorities.	The Transmission Operator or Balancing Authority failed to provide evidence that it completed an annual review, and updated each of its emergency plans appropriately. OR The Transmission Operator or Balancing Authority failed to provide a copy of one of its updated emergency plans to four of the following: its Reliability Coordinator and neighboring Transmission Operators or Balancing Authorities.
Response: Thank you for your comment. The VSL was revised so that it is no longer binary per your and other stakeholder's suggestions.					
EOP-001-1	R6	Remove the balloted VSLs for the sub-requirements and leave the balloted VSLs for the main requirement. No justification is given for why sub-requirements are given relative priorities or deviating from the number of sub-requirements violated approach. Furthermore, no justification is given for why missing three requirements should be moved from a High VSL to a Severe VSL.			
Response: Thank you for your comment. The VSLs for the subrequirements will be removed.					
EOP-001-2	R1	Leave as balloted. These VSLs do not reflect what is needed for reliability and the proposed VSLs raise the bar unnecessarily. It is not uncommon to have regulatory restrictions on whom an entity can sell their energy to. For example, there are several federally owned utilities that are prevented from having agreements to sell emergency energy to their adjacent BAs by federal law unless they are fit specifically within a group identified within that law. Often these are small entities. Their adjacent BAs are usually still able to procure sufficient emergency energy resources because they may be adjacent to a BA that is much larger that will provide more than ample access to emergency energy reserves. Thus, the size of the BA relative to its adjacent BAs is extremely important. A 500 MW BA may have 10 adjacent BA that are similar in size and one that is 10,000 MW. One agreement with the large BA will meet the intent of the requirement but the VSLs as written would imply that BA would be in a Severe			

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		violation of the requirement.			
Response: Thank you for your comment. The VSLs were revised to mitigate a gap in the percentage gradation.					
EOP-001-2	R3	Remove the balloted VSLs for the sub-requirements and leave the balloted VSLs for the main requirement. No justification is given for why sub-requirements are given relative priorities or deviating from the number of sub-requirements violated approach. Furthermore, no justification is given for why missing three requirements should be moved from a High VSL to a Severe VSL.			
Response: Thank you for your comment. The VSLs for the subrequirements will be removed. In this case of the currently proposed parent requirement, the subrequirements contribute unequally to the requirement and it is appropriate to differentiate them accordingly. Suggestion not adopted.					
EOP-001-2	R5	The Transmission Operator or Balancing Authority failed to provide a copy of one of its updated emergency plans to its Reliability Coordinator or one of its neighboring Transmission Operators or Balancing Authorities.	The Transmission Operator or Balancing Authority failed to provide a copy of one of its updated emergency plans to two of the following: its Reliability Coordinator and neighboring Transmission Operators or Balancing Authorities.	The Transmission Operator or Balancing Authority failed to provide a copy of one of its updated emergency plans to three of the following: its Reliability Coordinator and neighboring Transmission Operators or Balancing Authorities.	The Transmission Operator or Balancing Authority failed to provide evidence that it completed an annual review, and updated each of its emergency plans appropriately. OR The Transmission Operator or Balancing Authority failed to provide a copy of one of its updated emergency plans to four of the following: its Reliability Coordinator and neighboring Transmission Operators or Balancing Authorities.
Response: Thank you for your comment. The VSL was revised so that it is no longer binary per your and other stakeholder's suggestions.					
EOP-001-2	R6	Remove the balloted VSLs for the sub-requirements and leave the balloted VSLs for the main requirement. No justification is given for why sub-requirements are given relative priorities or deviating from the number of sub-requirements violated approach. Furthermore, no justification is given for why missing three requirements should be moved from a High VSL to a Severe VSL.			
Response: Thank you for your comment. The VSLs for the subrequirements will be removed.					
EOP-005-1 The proposed VSLs are	R1	The Transmission Operator has a restoration plan that	The Transmission Operator has a restoration plan that does not address two of the	The Transmission Operator has a restoration plan that does not address	The Transmission Operator has a restoration plan that does not address

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<p>not consistent with other VSLs that have multiple plan elements. The attachment contains nine elements thus there is plenty of room for four VSLs. Furthermore, it is not consistent with the VSL proposed for the same requirement in EOP-005-2. The VSLs in version 2 should be used.</p>		<p>does not address one of the applicable elements listed in Attachment 1-EOP-005.</p>	<p>applicable elements listed in Attachment 1-EOP-005.</p>	<p>three of the applicable elements listed in Attachment 1-EOP-005.</p>	<p>four or more of the applicable elements listed in Attachment 1-EOP-005. OR</p> <ul style="list-style-type: none"> ▪ The Transmission Operator does not have a restoration plan.
<p>Response: Thank you for your comment. The VSLs were revised to include further gradation of severity levels. The VSL language was also revised to better match the requirement language.</p>					
<p>EOP-006-2 There is no justification for jumping to Severe for violating one sub-requirement. There is no basis for jumping immediately to Severe for being one day late in delivering training.</p>	<p>R9</p>	<p>The Reliability Coordinator supplied annual System restoration training but did not address one of the sub-requirements. OR The Reliability Coordinator supplied the required System restoration training but it did not do so on or more frequently than an annual basis.</p>			<p>The Reliability Coordinator supplied annual System restoration training but did not address both of the sub-requirements.</p>
<p>Response: Thank you for your comment. Suggestion not adopted as current VSL more successfully maintains clarity and consistency with other VSLs and VSL guidelines.</p>					
<p>FAC-001-0</p>	<p>R2</p>	<p>The proposal makes the VSLs inconsistent with other VSLs and NERC’s August 10, 2009 informational filing. In the proposal, failure to meet one of the 16 sub-requirements results in a Severe violation. This also contradicts the Commission’s stated desire in their June 19, 2008 Order on VSLs to have as many VSLs as possible. We propose the retaining the balloted VSLs for R2 which are already rolled up and consistent with NERC’s filing and FERC’s order and simply removing the VSLs on all the sub-requirements.</p>			
<p>Response: Thank you for your comment. Suggestion adopted. The rollup of these VSLs was modified to replace the binary VSL with a set of graded VSLs.</p>					

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FAC-003-1	R4	While we agree that Regional Entity compliance with NERC reliability standards requirements could be appropriately addressed under NERC ROP, Section 100 does not specifically state this. It states “Each regional entity shall comply with these rules of procedure as applicable to functions delegated to the regional entity by NERC...”. Is the proposed change based on this statement? Please elaborate.			
<p>Response: Thank you for your comment. Yes, per Section 100 of NERC’s Rules of Procedure, requirements assigned to the Regional Entity (RRO) are addressed as a Rules of Procedure violation, rather than through the Compliance program. In addition, Order 693 Paragraph 157 describes the Commission view that RROs are not applicable entities for standard requirements.</p>					
<p>FAC-009-1</p> <p>Given that a VLS should be based on a single violation (Guideline 4), the VSLs should not refer to ‘one’, ‘two’ or ‘all’ of the requesting entities since requests by such entities should be treated independently and not as a group.</p> <p>Also, when is the responsible entity deemed to have not provided its Facility Ratings, 26 days, 36 days after the scheduled date? Unless this is defined the responsible entity can only be regarded as being late so the second part of the Severe VSL is unnecessary.</p> <p>Our proposed changes recognize that each request/response is a separate ‘transaction’ in respect of which the responsible entity’s compliance must be</p>	R2	The responsible entity provided its Facility Ratings to all of the requesting entity ies but missed meeting the schedules by up to 15 calendar days.	The responsible entity provided its Facility Ratings to all of the requesting entity ies but missed meeting the schedules by more than 15 calendar days but less than or equal to 25 calendar days.	The responsible entity provided its Facility Ratings to all of the requesting entity ies but missed meeting the schedules by more than 25 calendar days but less than or equal to 35 calendar days.	The responsible entity did not provided its Facility Ratings to all of the requesting entity ies but missed meeting the schedules by more than 35 calendar days after the schedule. OR The responsible entity did not provide its Facility Ratings to all of the requesting entities.

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assessed.					
Response: Thank you for your comment. Suggestion adopted to comply with Guideline 4.					
FAC-010-2.1 Changes made to more closely match the wording of the requirement and to make the VSLs more consistent with other requirements. R1 already states that the Planning Authority shall have an SOL methodology. R2 addresses the key components of the methodology.	R2	The Planning Authority's SOL has a methodology for determining SOLs that is missing one or two requirement as described in parts R2.1, R2.2, R2.3, R2.4, R2.5, or R2.6.	The Planning Authority's SOL has a methodology for determining SOLs that is missing three requirements as described in parts R2.1, R2.2, R2.3, R2.4, R2.5, or R2.6.	The Planning Authority's SOL has a methodology for determining SOLs that is missing four or five requirements as described in parts R2.1, R2.2, R2.3, R2.4, R2.5, or R2.6.	The Planning Authority's SOL has a methodology for determining SOLs that is missing six requirements as described in parts R2.1, R2.2, R2.3, R2.4, R2.5, or R2.6.
Response: Thank you for your comment. The suggestions were adopted for consistency with the language in the requirement. Additionally, the reference to the subrequirements was changed to a range for consistency with other VSLs.					
FAC-010-2.1 Same comment as for R2.	R3	The Planning Authority's SOL has a methodology for determining SOLs that includes a description for all but one or two of the following parts of R3: R3.1 through R3.6.	The Planning Authority's SOL has a methodology for determining SOLs that includes a description for all but three of the following part of R3: R3.1 through R3.6.	The Planning Authority's SOL has a methodology for determining SOLs that includes a description for all but four or five of the following parts of R3: R3.1 through R3.6.	The Planning Authority's SOL has a methodology for determining SOLs that is missing a description of six of the following part of R3: R3.1 through R3.6.
Response: Thank you for your comment. The suggestions were adopted for consistency with the language in the requirement.					
FAC-011-2 Changes made to more closely match the wording of the requirement. R1 already states that the Planning Authority shall have an SOL methodology. R2 addresses the key components of the	R2	The Reliability Coordinator's SOL has a methodology for determining SOLs that is missing one requirement as described in parts R2.1, R2.2, R2.3, or R2.4.	The Reliability Coordinator's SOL has a methodology for determining SOLs that is missing two requirements as described in parts R2.1, R2.2, R2.3, or R2.4.	The Reliability Coordinator's SOL has a methodology for determining SOLs that is missing three requirements as described in parts R2.1, R2.2, R2.3, or R2.4.	The Reliability Coordinator's SOL has a methodology for determining SOLs that is missing four or more requirements as described in parts R2.1, R2.2, R2.3, or R2.4.

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methodology.					
<p>Response: Thank you for your comment. The suggestions were adopted for consistency with the language in the requirement. Additionally, the reference to the subrequirements was changed to a range for consistency with other VSLs.</p>					
FAC-011-2 Same comment as for R2. Also there is a typo in the Severe VLS.	R3	The Reliability Coordinator's SOL has a methodology for determining SOLs that includes a description for all but one of the following parts of R3: R3.1 through R3.7.	The Reliability Coordinator's SOL has a methodology for determining SOLs that includes a description for all but two of the following parts of R3: R3.1 through R3.7.	The Reliability Coordinator's SOL has a methodology for determining SOLs that includes a description for all but three of the following parts of R3: R3.1 through R3.7.	The Reliability Coordinator's SOL has a methodology for determining SOLs that is missing a description of three four or more of the following parts of R3: R3.1 through R3.7.
<p>Response: Thank you for your comment. The suggestions were adopted for consistency with the language in the requirement.</p>					
FAC-011-2	R4	Change "Planning Authority" to "Reliability Coordinator"	Change "Planning Authority" to "Reliability Coordinator"	Change "Planning Authority" to "Reliability Coordinator"	Change "Planning Authority" to "Reliability Coordinator"
<p>Response: Thank you for your comment. Suggestion adopted.</p>					
FAC-013-1 The Lower VLS and the first parts of the Moderate, High and Severe VLSs seem to be the VLSs for R1. The wording of the first part of the Lower VSL does not make sense.	R2	The responsible entity failed to provide Transfer Capabilities to 5% or less of the required entities.	Delete first part.	Delete first part.	Delete first part.
<p>Response: Thank you for your comment. Suggestion adopted. The first portion of the VSLs appears to have been intended for R1 and was deleted. The Lower VSL was modified for consistency with the language in the requirement.</p>					
FAC-013-1 The VSLs for this part should be incorporated into the main requirement.	R2.1	Delete	Delete	Delete	Delete

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Response: Thank you for your comment. Suggestion adopted.					
FAC-013-1 The VSLs for this part should be incorporated into the main requirement.	R2.2	Delete	Delete	Delete	Delete
Response: Thank you for your comment. Suggestion adopted.					
FAC-014-2 The VLSs appear to be the same as the proposed VLSs for R2. The Severe VSL seems to be incorrect.	R1	No change to balloted VSL.	No change to balloted VSL.	No change to balloted VSL.	There are SOLs for the Reliability Coordinator Area, but more 75% of these are inconsistent with the Reliability Coordinator's SOL Methodology.
Response: Thank you for your comment. The entire set of VSLs for Requirement R1 has been rewritten based on stakeholder comments and to improve clarity, ensure consistency with other VSLs, and comply with recommendations of the VSL guidelines. The VSLs as proposed seemed to correspond with Requirement R2 rather than R1.					
FAC-014-2 The requirement uses Planning Authority. While both of these are defined terms and are identical, is it appropriate for the VSLs to use a different term? The VSLs should be consistent with the requirements.	R3				
Response: Thank you for your comment. The entire set of VSLs for Requirement R3 has been modified based on stakeholder comments and to improve clarity, ensure consistency with other VSLs, and comply with recommendations of the VSL guidelines.					
FAC-014-2	R4	There are one or more SOLs in the	Conforming changes as for	Conforming changes as	Conforming changes as

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<p>Same comment as R3 with respect to the Planning Authority. Also, the requirement does not refer to “Transmission Planner’s portion of the Planning Coordinator Area...”</p>		<p>Transmission Planner’s portion of the Planning Coordinator Transmission Planning Area that should have been established by the Transmission Planner that have not, and they make up less than 5% of all SOLs in the Transmission Planner’s Transmission Planning Area-portion of the PC area. OR There are one or more SOLs in the Transmission Planner’s portion of the Planning Coordinator Transmission Planning Area that were established by the Transmission Planner inconsistent with their Planning Coordinator’s SOL Methodology, and they make up less than 5% of all SOLs in the Transmission Planner’s Transmission Planning Area-portion of the PC area.</p>	<p>the Lower VSL.</p>	<p>for the Lower VSL.</p>	<p>for the Lower VSL.</p>
<p>Response: Thank you for your comment. The entire set of VSLs for Requirement R4 has been modified based on stakeholder comments and to improve clarity, ensure consistency with other VSLs, and comply with recommendations of the VSL guidelines.</p>					
<p>FAC-014-2 If the PA determines that</p>	<p>R6</p>	<p>The Planning Authority determined that it did not</p>			<p>The Planning Authority determined that it had one or more stability related</p>

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<p>there are no stability limits for multiple contingencies but fails to communicate this information, there will be no negative reliability impact. The VSLs should also probably consider if the PA did not identify the subset of multiple contingencies that could result in stability limits but subsequent analysis reveals there were none versus there being some. Not knowing there are none will have no reliability impact whereas not knowing there are some could have detrimental reliability impact.</p>		<p>have any stability related multiple contingencies, but did not notify the Reliability Coordinator of that determination.</p> <p>OR</p> <p>The Planning Authority did not identify the subset of multiple contingencies, from TPL-003 that resulted in stability limits and subsequent analysis identified that the subset is null.</p>			<p>multiple contingencies, but did not provide the complete list of multiple contingencies and the associated stability limits to the Reliability Coordinators that monitor the facilities associated with these contingencies and limits.</p> <p>OR</p> <p>The Planning Authority did not identify the subset of multiple contingencies, from TPL-003 that resulted in stability limits and subsequent analysis identified that there was at least one multiple contingency with a stability limit.</p>
<p>Response: Thank you for your comment. The DT agrees that the Planning Authority's failure to notify the Reliability Coordinator that there were no stability related multiple contingencies does not constitute a severe violation of the requirement. Suggestion adopted. The second recommended addition to the Lower VSL is redundant with the content of the Severe VSL and was not adopted.</p>					
<p>INT-001-3</p> <p>The NERC staff proposed VSLs are not consistent with guideline 4 as they in effect substitute "each" in R1.1 for "all". R1 is written to consider all dynamic schedules in aggregate. If a single schedule should have been considered a separate violation the</p>	<p>R1</p>	<p>The Load-Serving, Purchasing-Selling Entity failed to ensure that one Dynamic Schedule at the expected average MW profile for an hour was submitted to the Interchange Authority; as required by R1.1.</p>	<p>The Load-Serving, Purchasing-Selling Entity failed to ensure that two Dynamic Schedules at the expected average MW profile for an hour was submitted to the Interchange Authority; as required by R1.1.</p>	<p>The Load-Serving, Purchasing-Selling Entity failed to ensure that three Dynamic Schedules at the expected average MW profile for an hour was submitted to the Interchange Authority; as required by R1.1.</p>	<p>The Load-Serving, Purchasing-Selling Entity failed to ensure that submit four Dynamic Schedules at the expected average MW profile for an hour was submitted to the Interchange Authority; as required by R1.1.</p>

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language would have to read “Each Dynamic Schedule...”.					
<p>Response: Thank you for your comment. R1.1 requires that <i>all</i> Dynamic Schedules be submitted. If even one is missing, the entire requirement is violated. Thus, gradation is inappropriate and the suggestion was not adopted.</p>					
INT-001-3	R2	<p>Retain balloted VSLs for the main requirement and delete the VSLs for the subrequirement. The NERC staff proposed VSLs are not consistent with guideline 3 but the balloted VSLs are and the balloted VSLs are already consistent with Guideline 4. Interchanges is defined as “Energy transfers that cross Balancing Authority boundaries” in the NERC Glossary. Notice the it is written for multiple transfers of energy. Thus, the requirement considers schedules in the aggregate. Writing a single Severe VSL as NERC has proposed is equivalent to changing “transfers” to “transfer” in the glossary of terms which in effect modifies the standard.</p>			
<p>Response: Thank you for your comment. The VSLs refer to a single Arranged Interchange transaction for consistency with the requirement language. The changes suggested in this comment would violate FERC Guideline 4 – that the VSL assignment should be based on a single violation and not a cumulative number of violations. Suggestion not adopted.</p>					
<p>INT-004-2</p> <p>The responsible entity has to do two things, (1) release the limit under the appropriate conditions and (2) communicate the release to the Sink BA. For the Severe VSL, if the limit is not released, there would be nothing to communicate to the Sink BA so the VLS should be amended as proposed.</p> <p>If however the intent is that the responsible entity should have recognized that changed conditions allowed for the reloading of the transaction but did not, the VSL should be reworded appropriately. Reloading a curtailed tag</p>	R1	No change			<p>The responsible entity that initiated a curtailment failed to release the limit on the Interchange Transaction tag, at such time as the reliability event allowed for the reloading of the transaction, and failed to communicate the release of the limit to the Sink Balancing Authority.</p>

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<p>is commercial event and has nothing to do with reliability. The requirement needs to be modified.</p>					
<p>Response: Thank you for your comment. Suggestion adopted.</p>					
<p>INT-005-3</p>	<p>R1</p>	<p>Retain balloted VSLs. The NERC staff proposed VSLs are not consistent with guideline 3 but the balloted VSLs are and the balloted VSLs are already consistent with Guideline 4. Interchanges is defined as “Energy transfers that cross Balancing Authority boundaries” in the NERC Glossary. Notice that it is written for multiple transfers of energy. Thus, the requirement considers schedules in the aggregate. Writing a single Severe VSL as NERC has proposed is equivalent to changing “transfers” to “transfer” in the glossary of terms which in effect modifies the standard.</p>			
<p>Response: Thank you for your comment. The VSLs refer to a single Arranged Interchange transaction for consistency with the requirement language. The changes suggested in this comment would violate FERC Guideline 4 – that the VSL assignment should be based on a single violation and not a cumulative number of violations. Suggestion not adopted.</p>					
<p>INT-006-3</p> <p>Each responsible entity has a requirement to <u>respond</u> to each indicated request from the IA and further the BA must <u>evaluate</u> that three (3) criteria are met and the TSP must <u>confirm</u> that three (3) conditions are satisfied.</p> <p>In the Moderate VSL, the obligations on the TSP are not accounted for and should be included, with the condition that the TSP failed to address one of the elements of R1.2.</p> <p>The High VSL is written in</p>	<p>R1</p>		<p>See comment.</p>		<p>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: OR</p> <p>The responsible entity responded to a request from an Interchange Authority to transition an Arranged Interchange to a Confirmed Interchange but it either failed to:</p> <p>evaluate Arranged Interchange with respect</p>

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<p>such a way that the obligation on the TSP to respond is not accounted for. Also, the second part of this VSL should be written to cater for failure to address two of the elements of 1.2.</p> <p>Also, the Severe VSL should also cater for the possibility that the responsible entity responded but failed to address all of the elements of 1.1 and 1.2. Finally, when the entity failed to respond, it does not matter what else they did not do, so the first part of the VSL should be truncated as proposed.</p> <p>The NERC staff proposed VSLs are not consistent with guideline 3. Interchanges is defined as “Energy transfers that cross Balancing Authority boundaries” in the NERC Glossary. Notice that it is written for multiple transfers of energy. Thus, the requirement considers schedules in the aggregate. Writing VSLs such that failure to respond to a single Arranged Interchange as NERC has proposed is equivalent to changing</p>					<p>to any all of the subrequirements R1.1.1, R1.1.2 and R1.1.3. OR The responsible entity failed to confirm that the all of the required elements of R1.2 were satisfied. 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 (R1.2).</p>
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<p>“transfers” to “transfer” in the glossary of terms which in effect modifies the standard. Remember Interchange is used with the definition of Arranged Interchange.</p>					
<p>Response: Thank you for your comment. The VSL DT finds the VSLs to be clearer as written. Suggestion not adopted.</p>					
<p>INT-007-1 The NERC staff proposed VSLs are not consistent with guideline 3. Interchanges is defined as “Energy transfers that cross Balancing Authority boundaries” in the NERC Glossary. Notice that it is written for multiple transfers of energy. Thus, the requirement considers schedules in the aggregate. Writing VSLs such that failure to respond to a single Arranged Interchange as NERC has proposed is equivalent to changing “transfers” to “transfer” in the glossary of terms which in effect modifies</p>	<p>R1</p>				

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<p>the standard. Remember Interchange is used with the definition of Arranged Interchange.</p>					
<p>Response: Thank you for your comment. The VSLs refer to a single Arranged Interchange transaction for consistency with the requirement language. The changes suggested in this comment would violate FERC Guideline 4 – that the VSL assignment should be based on a single violation and not a cumulative number of violations. Suggestion not adopted.</p>					
<p>INT-008-3</p> <p>The VSLs do not accurately reflect the requirement. The requirement is for the IA to distribute to... <u>whether or not the Arranged Interchange had transitioned to a Confirmed Interchange.</u> As written, the VLSs focuses on distributing the Arranged Interchange.</p> <p>Also, replace “responsible entity”, with Interchange Authority since the only “target” of the requirement is the IA.</p> <p>The NERC staff proposed VSLs are not consistent with guideline 3. Interchanges is defined as “Energy transfers that cross Balancing Authority boundaries” in the NERC</p>	<p>R1</p>	<p>The Interchange Authority responsible 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 whether or not the Arranged Interchange had transitioned to a Confirmed Interchange but ...</p>	<p>Etc.</p>	<p>Etc.</p>	<p>Etc.</p>

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<p>Glossary. Notice that it is written for multiple transfers of energy. Thus, the requirement considers schedules in the aggregate. Writing VSLs such that failure to distribute a single Arranged Interchange as NERC has proposed is equivalent to changing “transfers” to “transfer” in the glossary of terms which in effect modifies the standard. Remember Interchange is used with the definition of Arranged Interchange.</p>					
<p>Response: Thank you for your comment. The VSLs were modified as suggested for clarity and consistency with the requirement language.</p>					
<p>IRO-001-1.1 No VSLs are needed and the requirement was obviated by paragraph 112 of Order 693-A. The following is an excerpt of that paragraph: “the Commission clarifies that a reliability coordinator’s authority to issue directives arises out of the Commission’s approval of Reliability Standards that mandate compliance with such directives.” Thus, Commission has confirmed that authority in the Order thus an RC should never have to prove this requirement.</p>					

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R3				
<p>Response: Thank you for your comment. VSLs are not used to identify authority; they are used to identify degrees of noncompliance with a specific requirement. Requirements are not obviated until they are formally retired.</p>				
IRO-001-1.1	R4			
<p>The VSLs are not consistent with other VSLs. They don't start with responsible entity for example.</p>				
<p>Response: Thank you for your comment. The VSLs have been modified and your suggestion has been adopted.</p>				
IRO-002-1	R6	High VSL does not make sense. How does one monitor BES elements without monitoring status, real power flow, reactive power flow, etc.?		
<p>Response: Thank you for your comment. The High VSL was modified for clarity.</p>				
IRO-002-1	R9			
<p>The requirement asks for the RC to have in place a process to control analysis tools including approval for planned maintenance and the procedure to mitigate the effect of their outages. The proposed Severe VSL does not address failure of having the process and procedure in place. Also, the wording in the Severe VSL leaves a question on who needs to seek the RC's approval</p>				
<p>The Reliability Coordinator does not have a process in place to control its analysis tools including approvals for planned maintenance.</p>				

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to proceed with the planned maintenance.					
Response: Thank you for your comment. Suggestion adopted.					
IRO-003-2	R1	While we are not opposed to the changes as it makes the VSLs clearer, we do not believe FERC Guideline 3 is the appropriate justification because the balloted VSLs were not inconsistent with the requirement. In fact, one could argue they were more consistent than the proposed VSLs because they largely repeated the requirement which the proposed VSLs do not.			
Response: Thank you for your comment.					
IRO-005-2 R1 is missing the "1"	R1	The term "IRO-005-1" is incorrect and not required.	The term "IRO-005-1" is incorrect and not required.	The term "IRO-005-1" is incorrect and not required.	The term "IRO-005-1" is incorrect and not required.
Response: Thank you for your comment. The "1" has been added to R1, and "IRO-005-1" has been removed from the VSLs.					
	R9				
Response: Thank you for your comment.					
	All Rs	We question the need to develop/revise the VSLs for IRO-005-2 when			

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		IRO-005-3 is already adopted by the BoT and approved by FERC. Wouldn't IRO-005-3 replace IRO-005-2?			
<p>Response: Thank you for your comment. IRO-005-3 has been approved by the BOT but not by FERC. While it is effective for Canadian entities based on the BOT approval, IRO-005-2 is still applicable to U.S. entities and must be included in this filing.</p>					
IRO-005-3	R1	The term "IRO-005-3" is not required.	The term "IRO-005-3" is not required.	The term "IRO-005-3" is not required.	The term "IRO-005-3" is not required.
<p>Response: Thank you for your comment. "IRO-005-3" has been removed from the VSLs.</p>					
	R6		.		
<p>Response: Thank you for your comment.</p>					
IRO-009-1 The "For each IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identifies one or more days prior to the current day" is the condition under which the RC is being asked to perform the tasks that follows. It is not by itself the requirement and therefore there should not be a VSL assigned to it not being performed.	R1				For an IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identified one or more days prior to the current day, the Reliability Coordinator did not develop an Operating Process, Procedure, or Plan that would identify actions it would take or actions it would direct others to take (up to and including load shedding) that could be implemented in time to prevent exceeding those IROLs.
<p>Response: Thank you for your comment. The VSL is written in a manner that is consistent with other VSLs (i.e., entity named first). Suggestion not adopted.</p>					

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Same reason as above	R2				For an IROL (in its Reliability Coordinator Area) that the Reliability Coordinator identified one or more days prior to the current day, the Reliability Coordinator did not develop an Operating Process, Procedure, or Plan that would identify actions it would take or actions it would direct others to take (up to and including load shedding) that could be implemented in time to mitigate exceeding that IROL within the IROL's Tv. (R2)
<p>Response: Thank you for your comment. The VSL is written in a manner that is consistent with other VSLs (i.e., entity named first). Suggestion not adopted.</p>					
<p>IRO-014-1</p> <p>Failing one of the two sub-requirements constitutes failing ½ of the intent of the requirement so such failure cannot be deemed to have a Lower VSL.</p>	R2			<p>The Reliability Coordinator's Operating Procedure, Process, or Plan was not agreed to by all the Reliability Coordinators required to take the indicated action(s). (R2.1)</p> <p>OR</p> <p>The Reliability Coordinator's Operating Procedure, Process, or Plan was not distributed to all Reliability Coordinators that are required to take the indicated action(s).</p>	

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				(R2.2)	
<p>Response: Thank you for your comment. The Lower VSL was made a Moderate VSL to reflect the importance of failing to complete one half of the intent of the requirement.</p>					
	R3			<p>The Reliability Coordinator’s Operating Procedure, Process, or Plan failed to reference the associated Reliability Coordinator-to-Reliability Coordinator Operating Procedure, Process, or Plan. (R3.1)</p> <p>OR</p> <p>The Reliability Coordinator’s Operating Procedure, Process, or Plan failed to include the agreed-upon actions from the associated Reliability Coordinator-to-Reliability Coordinator Operating Procedure, Process, or Plan. (R3.2)</p>	
<p>Response: Thank you for your comment. The Lower VSL was made a Moderate VSL to reflect the importance of failing to complete one half of the intent of the requirement.</p>					
<p>MOD-012-0</p> <p>Suggest to use language consistent with that used for the VSLs for R2 of MOD-010-0</p>	R2	<p>Propose to change the second part of this VSL to start with:</p> <p>“No schedule existed, and the Responsible Entity provided data more than 30 but less than or equal to 35 calendar days following</p>	<p>Propose Similar changes for Medium VSL</p>	<p>Propose similar change to High VSL</p>	<p>Propose similar change to Severe VSL</p>

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		the request.			
<p>Response: Thank you for your comment. Suggestion adopted. The VSLs for MOD-012-0 R2 were modified for consistency with the VSLs for MOD-010-0 R2.</p>					
MOD-018-0	R2				
<p>No justification was provided for changing the number of days in the Moderate, High and Severe VSLs. Please retain the original number of days.</p>					
<p>Response: Thank you for your comment. Increments for tardiness were changed to 10-day increments for consistency with the VSL guidelines. Suggestion not adopted.</p>					
MOD-020-0	R1				
<p>No justification was provided for changing the number of days in the Moderate, High and Severe VSLs. Please retain the original number of days.</p>					
<p>Response: Thank you for your comment. Increments for tardiness were changed to 10-day increments for consistency with the VSL guidelines. Suggestion not adopted.</p>					
MOD-021-0.1	R3				
<p>No justification was provided for changing the number of days in the Moderate, High and Severe VSLs. Please retain the original number of days.</p>					
<p>Response: Thank you for your comment. Thank you for your comment. Increments for tardiness were changed to 10-day increments for consistency with the VSL guidelines. Suggestion not adopted.</p>					

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<p>NUC-001-2</p> <p>Failure to operate within NPIRs is more impacting to reliability than failure to include NPIRs in the operating analyses. Failure to include NPIRs within operating analyses will make operating within NPIR more challenging but not impossible.</p>	<p>R4</p>		<p>The responsible entity did not comply with sub-requirement R4.3 but is compliant with subrequirements R4.1 and R4.2.</p>	<p>The responsible entity did not comply with R4.1 but is compliant with R4.2.</p>	<p>The responsible entity did not comply with R4.2.</p>
<p>Response: Thank you for your comment. Suggestion adopted.</p>					
<p>PER-002-0</p>	<p>R3</p>	<p>3 is missing from the requirement number in the proposal.</p>			
<p>Response: Thank you for your comment. The “3” has been added.</p>					
<p>PER-004-1</p> <p>The second part of the Severe VSL is not measurable</p>	<p>R5</p>				<p>The Reliability Coordinator did not have a protocol in place to inform operating personnel of updates to the SOL and IROL information.</p>
<p>Response: Thank you for your comment. The language in the second portion of the Severe VSL matches the language in the requirement. Suggestion not adopted.</p>					
<p>TOP-002-2a</p> <p>We suggest switching the Lower and Moderate VSLs. Failing to provide study results is not as impactful to reliability as failure to operate to a common limit.</p>	<p>R11</p>				

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Response: Thank you for your comment. Suggestion adopted.					
TOP-002-2a The condition that there was no communication is missing.	R17				The responsible entity did not communicate, or intentionally delayed communication of, the information described in the requirements R1 to R16 to its Reliability Coordinator.
Response: Thank you for your comment. The language of the VSL was modified to match the intent of the suggestion.					
TOP-003-1 The requirement asks for the responsible entity to make a/v the needed information by a specific time. Failing to meet the time line should constitute a High violation. Suggest to move the Low VSL to High VSL.	R1			The responsible entity failed to provide the information by 1200 Central Standard Time for the Eastern Interconnection and 1200 Pacific Standard Time for the Western Interconnection.	
Response: Thank you for your comment. There is no need to make the Lower VSL a High VSL. Suggestion not adopted.					
TOP-005-1.1	R1	The latter half of the VSLs do not make sense and actually violate Guideline 3 by modifying the requirement. Per R1.1, the RC is required to identify the data from the Attachment 1 that it needs. The requirement does not require the RC to include the entire list but to simply consider these as candidates for data. Thus, if the RC does not include something in their data specification, per the requirement it is not needed and not subject to the requirement.			
Response: Thank you for your comment. Suggestion adopted. Language referring to the Attachment as a whole was added to the Severe VSL.					
TOP-005-1.1	R1.1	These VSLs have been rolled up into the main requirement per NERC's August 10, 2009 informational filing. Thus, they should be deleted for R1.1.			

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Response: Thank you for your comment. Suggestion adopted.					
TOP-005-1.1 Suggest to move the Low VSL to High VSL. Didn't TOP-005-2 already replace TOP-005-1.1? If so, why are there VSLs posted for both?	R4	Suggest to provide graded VSL in terms of percentage of data not provided, or if part of the data is not provided, then the violation should be a High, not a Lower.		The responsible entity failed to provide some of the data requested by other Balancing Authorities or Transmission Operators.	
Response: Thank you for your comment. Suggestion adopted. VSLs modified to ensure consistency with other VSLs.					
TOP-005-2	R3	Same comment as indicated for TOP-005-1.1 R4. Also, the VSLs for TOP-005-2 R2, which stipulates similar requirements (to provide data), are graded. There should be consistency between the VSLs for similar type of requirements.			
Response: Thank you for your comment. Other VSLs were modified to ensure consistency with this one.					
TOP-006-1	R4			We are unable to tell the difference between the balloted language and the proposed language	We are unable to tell the difference between the balloted language and the proposed language
Response: Thank you for your comment. There were no differences and this was included in error.					
TOP-006-2 Again, why are VSLs for TOP-006-1 posted when	R5			We are unable to tell the difference between the balloted language and the	We are unable to tell the difference between the balloted language and the

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the standard has already got a newer version in TOP-006-2?				proposed language	proposed language
<p>Response: Thank you for your comment. There were no differences and this was included in error. FERC has not approved TOP-006-2, thus it is important to have VSLs for TOP-006-1 and TOP-006-2 as both may be effective at the same time in different jurisdictions.</p>					
<p>TOP-007-0</p> <p>We disagree with the graded VSLs by the % of IROL exceedance and/or the time beyond Tv. The corresponding IRO standards deem any exceedance beyond Tv not corrected (see R4 of IRO-009-1). Implementing load shedding to mitigate IROL exceedance is one of the means to meet the IRL-009 R4 requirement. The failure to correct IROL exceedance within Tv should be assigned a Severe VSL consistent with that of IRO-009-1 R4. Furthermore, the propose VSLs appear to confuse the concept of exceeding an IROL for less than Tv and violating the IROL which is exceeding the magnitude of the IROL for longer than Tv.</p>	R3				<p>Following a Contingency or other event that resulted in an IROL violation the Transmission Operator failed to take all appropriate action up to and including shedding of firm load to return its transmission system to within the IROL in less than 30 minutes.</p>
<p>Response: Thank you for your comment. Suggestion adopted.</p>					

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<p>VAR-001-1</p> <p>The VSLs do not include the language that the TOP shall specify a voltage or Reactive Power schedule.</p>	<p>R4</p>				
<p>Response: Thank you for your comment. Suggestion adopted. Language referring to the voltage or Reactive Power schedule was added to the Severe VSL.</p>					
<p>VAR-001-1</p> <p>Need to use the language in the Requirement. Suggest to replace “Maintain” with “disperse and locate” in the first condition in all VSLs. Further, a TOP cannot “maintain” reactive resources as it may not own any.</p>	<p>R9</p>	<p>The Transmission Operator did not disperse and locate 5% or less of the reactive resources needed to support its voltage under first Contingency conditions.</p> <p>OR</p> <p>...</p>	<p>The Transmission Operator did not disperse and locate more than 5% up to (and including) 10% of the reactive resources needed to support its voltage under first Contingency conditions.</p> <p>OR</p> <p>.....</p>	<p>The Transmission Operator did not disperse and locate more than 10% up to (and including) 15% of the reactive resources needed to support its voltage under first Contingency conditions.</p> <p>OR</p> <p>.....</p>	<p>The Transmission Operator did not disperse and locate more than 15% of the reactive resources needed to support its voltage under first Contingency conditions.</p> <p>OR</p> <p>.....</p>
<p>Response: Thank you for your comment. The requirement does use the word “maintain.” Suggestion not adopted.</p>					

Other Comments:

We question the need to develop/revise VSLs for different versions of the same standard, e.g. TOP-005-1.1 and TOP-005-2, and there are some others as indicated in our comments provided in the above Table.

Response: Thank you for your comment. Because different versions of the same standard, such as TOP-005, are in effect at the same time in different jurisdictions, it is important to have VSLs for all the versions that are in effect in at least one jurisdiction.

Denise Koeh, Bonneville Power Administration |

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Comments on VSLs:

Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
EOP-005-1	R1			The Transmission Operator has a restoration plan that does not address more than one of the applicable elements listed in Attachment 1-EOP-005.	The Transmission Operator does not have a restoration plan.
<p>Response: Thank you for your comment. The VSLs were revised to include further gradation of severity levels. The VSL language was also revised to better match the requirement language.</p>					
EOP-005-1	R11	The responsible entity immediately began to restore the Bulk Electric System to normal but failed to comply with one of the subrequirements R11.1, R11.2, and R11.3.	The responsible entity immediately began to restore the Bulk Electric System to normal but failed to comply with two of the subrequirements R11.1, R11.2, and R11.3.	The responsible entity immediately began to restore the Bulk Electric System to normal but failed to comply with three of the subrequirements R11.1, R11.2, and R11.3.	The responsible entity immediately began to restore the Bulk Electric System to normal but failed to comply with R11.4. OR the remaining three other requirements. The responsible entity did not immediately begin to restore the Bulk Electric System to normal.
<p>Response: Thank you for your comment. In this case, the subrequirements contribute unequally to the requirement and it is appropriate to differentiate them accordingly. Suggestion not adopted.</p>					

Carol Gerou, Midwest Reliability Organization

Comments: The MRO NSRS thanks for the effort in modifying VSLs to bring consistency and clarity is appreciated. MRO NSRS agrees that each requirement should have associated VSL and not specific to sub-requirements.

Response: Thank you for your comment.

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Mike Garton, Dominion Resources Services, Inc.

Comments on VSLs:

Standard Number	Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
BAL-002-0	R4	The Balancing Authority or the Reserve Sharing Group failed to meet the DCS requirement for 5% or less of Reportable Disturbances.	The Balancing Authority or the Reserve Sharing Group failed to meet the DCS requirements for more than 5% up to (and including) 10% of Reportable Disturbances.	The Balancing Authority or the Reserve Sharing Group failed to meet the DCS requirements for more than 10% up to (and including) 15% of Reportable Disturbances.	The Balancing Authority or the Reserve Sharing Group failed to meet the DCS requirements for more than 15% of Reportable Disturbances.
<p>Response: Thank you for your comment. The VSL DT has added “Balancing Authority” to the VSLs to maintain consistency with the language in the requirement.</p>					
EOP-001-0	R5	<p>Dominion does not agree that the plan must <u>include all</u> of the applicable elements, only that they be considered for inclusion and suggests the following:</p> <p>The Transmission Operator or Balancing Authority did not include for consideration one of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.</p>	<p>Dominion does not agree that the plan must <u>include all</u> of the applicable elements, only that they be considered for inclusion and suggests the following:</p> <p>The Transmission Operator or Balancing Authority did not include for consideration two of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.</p>	<p>Dominion does not agree that the plan must <u>include all</u> of the applicable elements, only that they be considered for inclusion and suggests the following:</p> <p>The Transmission Operator or Balancing Authority did not include for consideration three of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.</p>	<p>Dominion does not agree that the plan must <u>include all</u> of the applicable elements, only that they be considered for inclusion and suggests the following:</p> <p>The Transmission Operator or Balancing Authority did not include for consideration four or more of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.</p>
<p>Response: Thank you for your comment. Suggestion not adopted, as the changes as currently proposed are consistent with the language in the requirement.</p>					
EOP-001-1	R4	Dominion does not agree that the plan must <u>include all</u> of the	Dominion does not agree that the plan must <u>include all</u> of the applicable	Dominion does not agree that the plan must <u>include all</u> of the applicable	Dominion does not agree that the plan must <u>include all</u> of the applicable

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		<p>applicable elements, only that they be considered for inclusion and suggests the following:</p> <p>The Transmission Operator or Balancing Authority did not include for consideration one of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.</p>	<p>elements, only that they be considered for inclusion and suggests the following:</p> <p>The Transmission Operator or Balancing Authority did not include for consideration two of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.</p>	<p>elements, only that they be considered for inclusion and suggests the following:</p> <p>The Transmission Operator or Balancing Authority did not include for consideration three of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.</p>	<p>elements, only that they be considered for inclusion and suggests the following:</p> <p>The Transmission Operator or Balancing Authority did not include for consideration four or more of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.</p>
<p>Response: Thank you for your comment. The suggestion was not adopted as it would propose a lowering of the VSLs currently in place, a violation of FERC's VSL Guideline 1.</p>					
EOP-001-2	R4	<p>Dominion does not agree that the plan must <u>include all</u> of the applicable elements, only that they be considered for inclusion and suggests the following:</p> <p>The Transmission Operator or Balancing Authority did not include for consideration one of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.</p>	<p>Dominion does not agree that the plan must <u>include all</u> of the applicable elements, only that they be considered for inclusion and suggests the following:</p> <p>The Transmission Operator or Balancing Authority did not include for consideration two of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.</p>	<p>Dominion does not agree that the plan must <u>include all</u> of the applicable elements, only that they be considered for inclusion and suggests the following:</p> <p>The Transmission Operator or Balancing Authority did not include for consideration three of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.</p>	<p>Dominion does not agree that the plan must <u>include all</u> of the applicable elements, only that they be considered for inclusion and suggests the following:</p> <p>The Transmission Operator or Balancing Authority did not include for consideration four or more of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.</p>
<p>Response: Thank you for your comment. The suggestion was not adopted as it would propose a lowering of the VSLs currently in place, a violation of FERC's VSL Guideline 1.</p>					

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EOP-003-1	R7	<p>Dominion does not agree with inclusion of the sentence “Coordination with individual generating units is considered as one automatic action for purposes of determining Violation Severity Levels” as we don’t understand why generators should be weighted differently from capacitors or other automatic actions.</p>	<p>Dominion does not agree with inclusion of the sentence “Coordination with individual generating units is considered as one automatic action for purposes of determining Violation Severity Levels” as we don’t understand why generators should be weighted differently from capacitors or other automatic actions.</p>	<p>Dominion does not agree with inclusion of the sentence “Coordination with individual generating units is considered as one automatic action for purposes of determining Violation Severity Levels” as we don’t understand why generators should be weighted differently from capacitors or other automatic actions.</p>	<p>Dominion does not agree with inclusion of the sentence “Coordination with individual generating units is considered as one automatic action for purposes of determining Violation Severity Levels” as we don’t understand why generators should be weighted differently from capacitors or other automatic actions.</p>
EOP-005-1	R1	<p>Dominion does not agree that the plan must <u>include all</u> of the applicable elements, only that they be considered for inclusion and suggests the following:</p>	<p>Dominion does not agree that the plan must <u>include all</u> of the applicable elements, only that they be considered for inclusion and suggests the following: The responsible entity has</p>	<p>Dominion does not agree that the plan must <u>include all</u> of the applicable elements, only that they be considered for inclusion and suggests the following:</p>	<p>Dominion does not agree that the plan must <u>include all</u> of the applicable elements, only that they be considered for inclusion and suggests the following:</p>

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		<p>The responsible entity has a restoration plan that did not include for consideration one of the applicable elements listed in Attachment 1 EOP-005.</p>	<p>a restoration plan that did not include for consideration two of the applicable elements listed in Attachment 1 EOP-005.</p>	<p>The responsible entity has a restoration plan that did not include for consideration three of the applicable elements listed in Attachment 1 EOP-005.</p>	<p>The responsible entity has a restoration plan that did not include for consideration four or more of the applicable elements listed in Attachment 1 EOP-005.</p> <p>OR</p> <p>The responsible entity does not have a restoration plan.</p>
<p>Response: Thank you for your comment. The VSLs were revised to include further gradation of severity levels. The VSL language was also revised to better match the requirement language.</p>					

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EOP-005-2	R16	<p>The Generator Operator with a Blackstart Resource maintained testing records for a Blackstart Resource, but was missing one of the pieces of information required in R16.</p> <p>OR</p> <p>The Generator Operator with a Blackstart Resource did not supply the Blackstart Resource testing records as requested within 59 calendar days of the request.</p>	<p>The Generator Operator with a Blackstart Resource maintained testing records for a Blackstart Resource, but was missing two of the pieces of information required in R16.</p> <p>OR</p> <p>The Generator Operator with a Blackstart Resource did not supply the Blackstart Resource testing records as requested for 60 days to 89 calendar days after the request.</p>	<p>The Generator Operator with a Blackstart Resource maintained testing records for a Blackstart Resource, but was missing three of the pieces of information required in R16.</p> <p>OR</p> <p>The Generator Operator with a Blackstart Resource did not supply the Blackstart Resource testing records as requested for 90 to 119 calendar days after the request.</p>	
<p>Response: Thank you for your suggestion. Suggestion not adopted for consistency with other VSLs.</p>					
FAC-010-2.1					<p>The Planning Authority received documented technical comments on its SOL Methodology and failed to provide a complete response within 90 calendar days.</p> <p>OR</p> <p>The Planning Authority's response to documented technical comments on its SOL Methodology did not indicate whether a change will be made to the SOL</p>

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					Methodology
<p>Response: Thank you for your comment. Suggestion not adopted because the Severe VSL was otherwise modified to avoid redundancy with the High VSL and to comply with recommendations of the VNk you for your comment. Suggestion adopted. SL guidelines.</p>					
TOP-007-0	R3		Dominion does not agree with the proposed change. Violation of an IROL should be a severe VSL.	Dominion does not agree with the proposed change. Violation of an IROL should be a severe VSL.	The Transmission Operator failed to take all appropriate actions up to and including shedding firm load, or directing the shedding of firm load, in order to return the transmission system to IROL within 30 minutes.
<p>Response: Thank you for your comment. Suggestion adopted.</p>					
VAR-001-1	R2	Keep original language. The revised language bases compliance on	Keep original language. The revised language bases compliance on failure	Keep original language. The revised language bases compliance on	Keep original language. The revised language bases compliance on

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		failure to acquire instead of basing it on acquiring reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions. While we understand the SDT's reason for the proposed change, we do not believe the proposed change improves understanding of the VSL	to acquire instead of basing it on acquiring reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions. While we understand the SDT's reason for the proposed change, we do not believe the proposed change improves understanding of the VSL	failure to acquire instead of basing it on acquiring reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions. While we understand the SDT's reason for the proposed change, we do not believe the proposed change improves understanding of the VSL	failure to acquire instead of basing it on acquiring reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions. While we understand the SDT's reason for the proposed change, we do not believe the proposed change improves understanding of the VSL
<p>Response: Thank you for your comment. Suggestion not adopted because proposed changes to VSLs ensure clarity and consistency with other VSLs and the VSL guidelines.</p>					
VAR-001-1	R3.1	<p>The proposed language states 2 'measures' which, when combined, may not be true. Suggest one or the other be used or that the term OR be added between the 'measures'.</p> <p>The Transmission Operator maintained the list of generators in its area that are exempt from following a voltage or Reactive Power schedule, but is missing one or more entities OR missing entities represented 5% or less of those eligible</p>	<p>The proposed language states 2 'measures' which, when combined, may not be true. Suggest one or the other be used or that the term OR be added between the 'measures'.</p> <p>The Transmission Operator maintained the list of generators in its area that are exempt from following a voltage or Reactive Power schedule, but is missing two or more entities OR the missing entities represented more than 5% up to (and including) 10% of those eligible for the</p>	<p>The proposed language states 2 'measures' which, when combined, may not be true. Suggest one or the other be used or that the term OR be added between the 'measures'.</p>	<p>The proposed language states 2 'measures' which, when combined, may not be true. Suggest one or the other be used or that the term OR be added between the 'measures'.</p>

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		for the list.	list.	The Transmission Operator maintained the list of generators in its area that are exempt from following a voltage or Reactive Power schedule, but is missing three or more entities OR the missing entities represented more than 10% up to (and including) 15% of those eligible for the list.	The Transmission Operator maintained the list of generators in its area that are exempt from following a voltage or Reactive Power schedule, but is missing four or more entities OR the missing entities represented more than 15% of those eligible for the list.
<p>Response: Thank you for your comment. The VSL text was revised to remove possible conflict arising from the use of minimum quantities in conjunction with the limiting percentages. The VSLs were revised to retain only the gradation by percentages.</p>					
VAR-001-1	R3.2	Keep original language. The revised language bases compliance on failure to notify. While we understand the SDT's reason for the proposed change, we do not believe the proposed change improves understanding of the VSL	Keep original language. The revised language bases compliance on failure to notify. While we understand the SDT's reason for the proposed change, we do not believe the proposed change improves understanding of the VSL	Keep original language. The revised language bases compliance on failure to notify. While we understand the SDT's reason for the proposed change, we do not believe the proposed change improves understanding of the VSL	Keep original language. The revised language bases compliance on failure to notify. While we understand the SDT's reason for the proposed change, we do not believe the proposed change improves understanding of the VSL
<p>Response: Thank you for your comment. Suggestion not adopted because proposed changes to VSLs ensure clarity and consistency with other VSLs and the VSL guidelines.</p>					
VAR-001-1	R4	The Transmission Operator provided Voltage or Reactive Power schedules for 95% but less than 100% of the generating units as required in R4.	The Transmission Operator provided Voltage or Reactive Power schedules for 90% but less than 95% of the generating units as required in R4.	The Transmission Operator provided Voltage or Reactive Power schedules for 85% but less than 90% of the generating units as required in R4.	The Transmission Operator provided Voltage or Reactive Power schedules for less than 85% of the generating units as required in R4.

Response: Thank you for your comment. Suggestion not adopted because proposed changes to VSLs ensure clarity and consistency with other VSLs and the VSL guidelines.

Other Comments:

Dominion would also like to make a general statement concerning the VSLs for all of these standards. We are unsure as to whether the correct threshold¹ for Low, Moderate, High and Severe is correctly identified but have no basis for a denial or suggested change. We are curious as to how the various SDTs came up with these. In some draft standards, these thresholds seem to be developed around 25% quartiles, which makes it easier to accept the high and severe categories if you consider these equivalent to a pass/fail (D or F).

¹ one reliability entity or 5% or less of the entities whichever is less, two reliability entities or more than 5% and less than or equal to 10% of the entities whichever is less, three reliability entities or more than 10% and less than or equal to 15% of the reliability entities whichever is less, and four or more of the reliability entities or more than 15% of the reliability entities whichever is less