

Staff Proposed Changes to Previously Balloted Violation Severity Levels (Communications, Emergency Operations, Personnel)

In its June 19, 2008 VSL Order, FERC directed NERC to review all Violation Severity Level assignments, (with the exception of those for which the Commission directed specific modification), for compliance with Guidelines 2b, 3, and 4 and submit a compliance filing either validating the current Violation Severity Level assignments or proposing revision. Here are the relevant "Guidelines":

- Guideline 2b — VSLs should not use ambiguous terms such as "minor" or "significant" to describe noncompliant performance.
- Guideline 3 — VSLs should be consistent with the corresponding requirement (VSLs should not expand on what is in the requirement).
- Guideline 4 — VSLs should be based on a single violation, not on a cumulative number of violations (unless stated otherwise in the requirement).

FERC also directed NERC to modify some VSLs and identified these VSLs in Appendix A of its VSL Order. The VSLs have been reviewed, balloted, and reviewed again for consistency with the FERC Guidelines. The review subsequent to the last ballot identified some discrepancies and inconsistencies in the VSL assignments last balloted. The VSLs in this document focus solely on those proposed changes necessary to resolve those inconsistencies. Each change is accompanied by an explanation, which provides the rationale for the proposed change.

The following tables show the previously balloted language and the staff proposed VSLs, edited with conforming changes made based on stakeholder comments submitted during the formal comment period that ended September 16, 2010.

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COM-001-1.1 - Telecommunications					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R3. Each Reliability Coordinator, Transmission Operator and Balancing Authority shall provide a means to coordinate telecommunications among their respective areas. This coordination shall include the ability to investigate and recommend solutions to telecommunications problems within the area and with other areas.	<i>Balloted Language</i>	N/A	N/A	The responsible entity failed to assist in the investigation and recommending of solutions to telecommunications problems within the area and with other areas.	The responsible entity failed to provide a means to coordinate telecommunications among their respective areas including assisting in the investigation and recommending of solutions to telecommunications problems within the area and with other areas.
R3	<i>Proposed Change</i>	N/A	N/A	N/A	The responsible entity failed to provide a means to coordinate telecommunications among its respective areas including the ability to investigate and recommend solutions to telecommunications problems within the area and with other areas.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-001-0 – Emergency Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R5. Each Transmission Operator and Balancing Authority shall include the applicable elements in Attachment 1-EOP-001-0 when developing an emergency plan.	<i>Balloted Language</i>	The Transmission Operator and Balancing Authority emergency plan has complied with 90% or more of the number of sub-components.	The Transmission Operator and Balancing Authority emergency plan has complied with 70% to 90% of the number of sub-components.	The Transmission Operator and Balancing Authority emergency plan has complied with 50% to 70% of the number of sub-components.	The Transmission Operator and Balancing Authority emergency plan has complied with 50% or less of the number of sub-components
R5	<i>Proposed Change</i>	The Transmission Operator or Balancing Authority did not include one of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority did not include two of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority did not include three of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority did not include four or more of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.

Explanation – The VSLs were modified to be consistent with FERC Guideline 1.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-001-1 – Emergency Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.	<i>Balloted Language</i>	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for less than 25% of the adjacent BAs. Or less than 25% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 25% to 50% of the adjacent BAs. Or 25 to 50% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 50% to 75% of the adjacent BAs. Or 50% to 75% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 75% or more of the adjacent BAs. Or more than 75% of those agreements do not contain provisions for emergency assistance.
R1	<i>Proposed Change</i>			The Balancing Authority had operating agreements with adjacent Balancing Authorities, but the agreements did not contain provisions for emergency assistance from remote Balancing Authorities.	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.
Explanation – The VSLs were modified for clarity and consistency with the requirement and other standards and VSLs.					
R2. Each Transmission Operator and Balancing Authority shall:	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with four (4) of the sub-components.
R2.1. Develop, maintain, and implement a set of plans to mitigate operating emergencies for	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority's emergency	The Transmission Operator or Balancing Authority's has	The Transmission Operator or Balancing Authority's emergency	The Transmission Operator or Balancing Authority has failed to

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EOP-001-1 – Emergency Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
insufficient generating capacity.		plans to mitigate insufficient generating capacity are missing minor details or minor program/procedural elements.	demonstrated the existence of emergency plans to mitigate insufficient generating capacity emergency plans but the plans are not maintained.	plans to mitigate insufficient generating capacity emergency plans are neither maintained nor implemented.	develop emergency mitigation plans for insufficient generating capacity.
R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority's plans to mitigate transmission system emergencies are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of transmission system emergency plans but are not maintained.	The Transmission Operator or Balancing Authority's transmission system emergency plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop, maintain, and implement operating emergency mitigation plans for emergencies on the transmission system.
R2.3. Develop, maintain, and implement a set of plans for load shedding.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority's load shedding plans are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of load shedding plans but are not maintained.	The Transmission Operator or Balancing Authority's load shedding plans are partially compliant with the requirement but are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop, maintain, and implement load shedding plans.
R2.4. Develop, maintain, and implement a set of plans for system restoration.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority's system restoration plans are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's system restoration plans are partially compliant with the requirement but are not maintained.	The Transmission Operator or Balancing Authority's restoration plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop, maintain, and implement operating emergency mitigation plans for system restoration.
R2	<i>Proposed Change</i>	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..

Explanation – Consistent with Guidelines filed with FERC on August 11, 2009 NERC incorporated the sub-requirements into the Main Requirement VSL so that

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EOP-001-1 – Emergency Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
compliance is based on meeting criteria specified in components.					
R3. Each Transmission Operator and Balancing Authority shall have emergency plans that will enable it to mitigate operating emergencies. At a minimum, Transmission Operator and Balancing Authority emergency plans shall include:	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components.	The Transmission Operator or Balancing Authority has failed to comply with all four (4) of the sub-components.
R3.1. Communications protocols to be used during emergencies.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority's communication protocols included in the emergency plan are missing minor program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority has failed to include communication protocols in its emergency plans to mitigate operating emergencies.
R3.2. A list of controlling actions to resolve the emergency. Load reduction, in sufficient quantity to resolve the emergency within NERC-established timelines, shall be one of the controlling actions.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority's list of controlling actions has resulted in meeting the intent of the requirement but is missing minor program/procedural elements.	N/A	The Transmission Operator or Balancing Authority provided a list of controlling actions, however the actions fail to resolve the emergency within NERC-established timelines.	The Transmission Operator or Balancing Authority has failed to provide a list of controlling actions to resolve the emergency.
R3.3. The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority has demonstrated coordination with Transmission Operators and Balancing Authorities but is missing minor program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority has failed to demonstrate the tasks to be coordinated with adjacent Transmission Operator and Balancing Authorities as directed by the requirement.

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EOP-001-1 – Emergency Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R3.4. Staffing levels for the emergency.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority's emergency plan does not include staffing levels for the emergency	N/A	N/A	N/A
R3.	<i>Proposed Change</i>	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-requirement 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.
Explanation – The VSLs were modified to be consistent with FERC Guidelines 1 and 3. Consistent with Guidelines filed with FERC on August 11, 2009 NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					
R4. Each Transmission Operator and Balancing Authority shall include the applicable elements in Attachment 1-EOP-001-0 when developing an emergency plan.	<i>Balloted Language</i>	The Transmission Operator and Balancing Authority's emergency plan has complied with 90% or more of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with 70% to 90% of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with between 50% to 70% of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with 50% or less of the number of sub-components
R4	<i>Proposed Change</i>	The Transmission Operator or Balancing Authority did not include one of the applicable elements in Attachment 1-EOP-001-0 in its	The Transmission Operator or Balancing Authority did not include two of the applicable elements in Attachment 1-EOP-001-0 in its	The Transmission Operator or Balancing Authority did not include three of the applicable elements in Attachment 1-EOP-001-0 in its	The Transmission Operator or Balancing Authority did not include four or more of the applicable elements in Attachment 1-EOP-001-

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EOP-001-1 – Emergency Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		emergency plan.	emergency plan.	emergency plan.	0 in its emergency plan.
Explanation – The VSLs were modified to be consistent with FERC Guideline 1.					
R5. The Transmission Operator and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.	<i>Balloted Language</i>	The Transmission Operator and Balancing Authority is missing minor program/procedural elements.	The Transmission Operator and Balancing Authority has failed to annually review one of its emergency plans	The Transmission Operator and Balancing Authority has failed to annually review two of its emergency plans or communicate with one of its neighboring Balancing Authorities.	The Transmission Operator and Balancing Authority has failed to annually review and/or communicate any emergency plans with its Reliability Coordinator, neighboring Transmission Operators or Balancing Authorities.
R5	<i>Proposed Change</i>	N/A	N/A	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.	The Transmission Operator or Balancing Authority failed to complete an annual review, and update each of its emergency plans appropriately.
Explanation – The VSLs were modified to be consistent with FERC Guidelines 1 and 3.					
R6. The Transmission Operator and Balancing Authority shall coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate. This coordination includes the following steps, as applicable:	<i>Balloted Language</i>	The Transmission Operator and/or the Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator and/or the Balancing Authority failed to comply with two (2) of the sub-components.	The Transmission Operator and/or the Balancing Authority has failed to comply with three (3) of the sub-components.	The Transmission Operator and/or the Balancing Authority has failed to comply with four (4) or more of the sub-components.
R6.1. The Transmission Operator and Balancing Authority shall	<i>Balloted Language</i>	The Transmission Operator or Balancing	N/A	N/A	N/A

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EOP-001-1 – Emergency Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
establish and maintain reliable communications between interconnected systems.		Authority has failed to establish and maintain reliable communication between interconnected systems.			
R6.2. The Transmission Operator and Balancing Authority shall arrange new interchange agreements to provide for emergency capacity or energy transfers if existing agreements cannot be used.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority has failed to arrange new interchange agreements to provide for emergency capacity or energy transfers with required entities when existing agreements could not be used.	N/A	N/A	N/A
R6.3. The Transmission Operator and Balancing Authority shall coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply. (This includes water for hydro generators.)	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority has failed to coordinate transmission and generator maintenance schedules to maximize capacity or conserve fuel in short supply.	N/A	N/A	N/A
R6.4. The Transmission Operator and Balancing Authority shall arrange deliveries of electrical energy or fuel from remote systems through normal operating channels.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority has failed to arrange for deliveries of electrical energy or fuel from remote systems through normal operating channels.	N/A	N/A	N/A
R6	<i>Proposed Change</i>	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-	The Transmission Operator or Balancing Authority failed to comply with two or more of the sub-requirements

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EOP-001-1 – Emergency Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
				requirement 6.2.	identified for R6.

Explanation – The VSLs were modified to be consistent with FERC Guideline 1, as well as for clarity and consistency with other standards and VSLs. Consistent with Guidelines filed with FERC on August 11, 2009 NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.

EOP-001-2 – Emergency Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.	<i>Balloted Language</i>	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for less than 25% of the adjacent BAs. Or less than 25% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 25% to 50% of the adjacent BAs. Or 25 to 50% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 50% to 75% of the adjacent BAs. Or 50% to 75% of those agreements do not contain provisions for emergency assistance.	The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 75% or more of the adjacent BAs. Or more than 75% of those agreements do not contain provisions for emergency assistance.
R1	<i>Proposed Change</i>	The Balancing Authority had operating agreements with more than 95%, but less than 100%, of its adjacent BAs. OR More than 95%, but less than 100%, of the Balancing Authority's agreements contain provisions for emergency assistance.	The Balancing Authority had operating agreements with more than 90%, but not more than 95%, of its adjacent BAs. OR More than 90%, but not more than 75%, of the Balancing Authority's agreements contain provisions for emergency assistance.	The Balancing Authority had operating agreements with more than 85%, but not more than 80%, of its adjacent BAs. OR More than 85%, but not more than 80%, of the Balancing Authority's agreements contain provisions for emergency assistance.	The Balancing Authority had operating agreements with 85% or less of its adjacent BAs. OR 85% or less of the Balancing Authority's agreements contain provisions for emergency assistance.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R2. Each Transmission Operator and Balancing Authority shall:	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components.	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components.	N/A	The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components.
R2.1. Develop, maintain, and implement a set of plans to	<i>Balloted Language</i>	The Transmission Operator or Balancing	The Transmission Operator or Balancing	The Transmission Operator or Balancing	The Transmission Operator or Balancing

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EOP-001-2 – Emergency Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
mitigate operating emergencies for insufficient generating capacity.		Authority's emergency plans to mitigate insufficient generating capacity are missing minor details or minor program/procedural elements.	Authority's has demonstrated the existence of emergency plans to mitigate insufficient generating capacity emergency plans but the plans are not maintained.	Authority's emergency plans to mitigate insufficient generating capacity emergency plans are neither maintained nor implemented.	Authority has failed to develop emergency mitigation plans for insufficient generating capacity.
R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority's plans to mitigate transmission system emergencies are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of transmission system emergency plans but are not maintained.	The Transmission Operator or Balancing Authority's transmission system emergency plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop, maintain, and implement operating emergency mitigation plans for emergencies on the transmission system.
R2.3. Develop, maintain, and implement a set of plans for load shedding.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority's load shedding plans are missing minor details or minor program/procedural elements.	The Transmission Operator or Balancing Authority's has demonstrated the existence of load shedding plans but are not maintained.	The Transmission Operator or Balancing Authority's load shedding plans are partially compliant with the requirement but are neither maintained nor implemented.	The Transmission Operator or Balancing Authority has failed to develop, maintain, and implement load shedding plans.
R2	<i>Proposed Change</i>	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.
Explanation – Consistent with Guidelines filed with FERC on August 11, 2009 NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					
R3. Each Transmission Operator and Balancing Authority shall have emergency plans that will enable it to mitigate operating emergencies. At a minimum,	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority failed to comply with one (1) of	The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-	The Transmission Operator or Balancing Authority has failed to comply with three (3) of	The Transmission Operator or Balancing Authority has failed to comply with all four (4)

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EOP-001-2 – Emergency Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Transmission Operator and Balancing Authority emergency plans shall include:		the sub-components.	components.	the sub-components.	of the sub-components.
R3.1. Communications protocols to be used during emergencies.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority's communication protocols included in the emergency plan are missing minor program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority has failed to include communication protocols in its emergency plans to mitigate operating emergencies.
R3.2. A list of controlling actions to resolve the emergency. Load reduction, in sufficient quantity to resolve the emergency within NERC-established timelines, shall be one of the controlling actions.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority's list of controlling actions has resulted in meeting the intent of the requirement but is missing minor program/procedural elements.	N/A	The Transmission Operator or Balancing Authority provided a list of controlling actions, however the actions fail to resolve the emergency within NERC-established timelines.	The Transmission Operator or Balancing Authority has failed to provide a list of controlling actions to resolve the emergency.
R3.3. The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority has demonstrated coordination with Transmission Operators and Balancing Authorities but is missing minor program/procedural elements.	N/A	N/A	The Transmission Operator or Balancing Authority has failed to demonstrate the tasks to be coordinated with adjacent Transmission Operator and Balancing Authorities as directed by the requirement.
R3.4. Staffing levels for the emergency.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority's emergency plan does not include staffing levels for the	N/A	N/A	N/A

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EOP-001-2 – Emergency Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		emergency			
R3	<i>Proposed Change</i>	The Transmission Operator or Balancing Authority failed to comply with sub-requirement R3.4s.	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-requirement 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.
Explanation – The VSLs were modified to be consistent with FERC Guidelines 1 and 3. Consistent with Guidelines filed with FERC on August 11, 2009 NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					
R4. Each Transmission Operator and Balancing Authority shall include the applicable elements in Attachment 1-EOP-001-0 when developing an emergency plan.	<i>Balloted Language</i>	The Transmission Operator and Balancing Authority's emergency plan has complied with 90% or more of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with 70% to 90% of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with between 50% to 70% of the number of sub-components.	The Transmission Operator and Balancing Authority's emergency plan has complied with 50% or less of the number of sub-components
R4	<i>Proposed Change</i>	The Transmission Operator or Balancing Authority did not include one of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority did not include two of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority did not include three of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority did not include four or more of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.
Explanation – The VSLs were modified to be consistent with FERC Guideline 1.					

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-001-2 – Emergency Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R5. The Transmission Operator and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.	<i>Balloted Language</i>	The Transmission Operator and Balancing Authority is missing minor program/procedural elements.	The Transmission Operator and Balancing Authority has failed to annually review one of its emergency plans	The Transmission Operator and Balancing Authority has failed to annually review two of its emergency plans or communicate with one of its neighboring Balancing Authorities.	The Transmission Operator and Balancing Authority has failed to annually review and/or communicate any emergency plans with its Reliability Coordinator, neighboring Transmission Operators or Balancing Authorities.
R5	<i>Proposed Change</i>	N/A	N/A	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.	The Transmission Operator or Balancing Authority failed to complete an annual review, and updated each of its emergency plans appropriately.
Explanation – The VSLs were modified to be consistent with FERC Guidelines 2 and 3.					
R6. The Transmission Operator and Balancing Authority shall coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate. This coordination includes the following steps, as applicable:	<i>Balloted Language</i>	The Transmission Operator and/or the Balancing Authority failed to comply with one (1) of the sub-requirements.	The Transmission Operator and/or the Balancing Authority failed to comply with two (2) of the sub-requirements.	The Transmission Operator and/or the Balancing Authority has failed to comply with three (3) of the sub-requirements.	The Transmission Operator and/or the Balancing Authority has failed to comply with four (4) or more of the sub-requirements.
R6.1. The Transmission Operator and Balancing Authority shall establish and maintain reliable communications between interconnected systems.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority has failed to establish and maintain reliable communication	N/A	N/A	N/A

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EOP-001-2 – Emergency Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		between interconnected systems.			
R6.2. The Transmission Operator and Balancing Authority shall arrange new interchange agreements to provide for emergency capacity or energy transfers if existing agreements cannot be used.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority has failed to arrange new interchange agreements to provide for emergency capacity or energy transfers with required entities when existing agreements could not be used.	N/A	N/A	N/A
R6.3. The Transmission Operator and Balancing Authority shall coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply. (This includes water for hydro generators.)	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority has failed to coordinate transmission and generator maintenance schedules to maximize capacity or conserve fuel in short supply.	N/A	N/A	N/A
R6.4. The Transmission Operator and Balancing Authority shall arrange deliveries of electrical energy or fuel from remote systems through normal operating channels.	<i>Balloted Language</i>	The Transmission Operator or Balancing Authority has failed to arrange for deliveries of electrical energy or fuel from remote systems through normal operating channels.	N/A	N/A	N/A
R6	<i>Proposed Change</i>	The Transmission Operator or Balancing Authority failed to comply with sub-component R6.4.	The Transmission Operator or Balancing Authority failed to comply with sub-component R6.3.	The Transmission Operator or Balancing Authority failed to comply with either sub-component R6.1 or sub-component R6.2.	The Transmission Operator or Balancing Authority failed to comply with two or more of the sub-components identified for R6.

Explanation – The VSLs were modified to be consistent with FERC Guideline 1, as well as for clarity and consistency with other standards and VSLs.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-001-2 – Emergency Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Consistent with Guidelines filed with FERC on August 11, 2009 NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					

EOP-003-1 – Load Shedding Plans

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R7. The Transmission Operator and Balancing Authority shall coordinate automatic load shedding throughout their areas with underfrequency isolation of generating units, tripping of shunt capacitors, and other automatic actions that will occur under abnormal frequency, voltage, or power flow conditions.	<i>Balloted Language</i>	The applicable entity did not coordinate automatic load shedding, as directed by the requirement, affecting 5% or less of its automatic actions.	The applicable entity did not coordinate automatic load shedding, as directed by the requirement, affecting between 5 -10% of its automatic actions.	The applicable entity did not coordinate automatic load shedding, as directed by the requirement, affecting 10-15%, inclusive, of its automatic actions.	The applicable entity did not coordinate automatic load shedding, as directed by the requirement, affecting greater than 15% of its automatic actions.
R7	<i>Proposed Change</i>	The responsible entity did not coordinate automatic load shedding with 5% or less of the types of automatic actions described in the Requirement.	The responsible entity did not coordinate automatic load shedding with more than 5% up to (and including) 10% of the types of automatic actions described in the Requirement.	The responsible entity did not coordinate automatic load shedding with more than 10% up to (and including) 15% of the types of automatic actions described in the Requirement.	The responsible entity did not coordinate automatic load shedding with more than 15% of the types of automatic actions described in the Requirement.

Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-004-1 – Disturbance Reporting					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Each Regional Reliability Organization shall establish and maintain a Regional reporting procedure to facilitate preparation of preliminary and final disturbance reports.	<i>Balloted Language</i>	The Regional Reliability Organization has demonstrated the existence of a regional reporting procedure, but the procedure is missing minor details or minor program/procedural elements.	The Regional Reliability Organization Regional reporting procedure have been is missing one element that would make the procedure meet the requirement.	The Regional Reliability Organization Regional has a regional reporting procedure but the procedure is not current.	The Regional Reliability Organization does not have a regional reporting procedure.
R1	<i>Proposed Change</i>	N/A	N/A	N/A	N/A
Explanation – 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. As such, VSLs for this requirement are inappropriate.					
R3. A Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity experiencing a reportable incident shall provide a preliminary written report to its Regional Reliability Organization and NERC.	N/A	N/A	N/A	N/A	The responsible entities failed to provide a preliminary written report as directed by the requirement.
R3	<i>Proposed Change</i>	N/A	N/A	The responsible entity experienced a reportable incident and provided a preliminary written report to either the RRO or to NERC, but not both.	The responsible entity experienced a reportable incident and provided a preliminary written report to neither the RRO nor NERC.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R4. When a Bulk Electric System disturbance occurs, the Regional Reliability Organization shall make its representatives on the NERC Operating Committee and Disturbance Analysis Working	<i>Balloted Language</i>	N/A	N/A	N/A	The RRO did not make its representatives on the NERC Operating Committee and Disturbance Analysis Working Group available

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-004-1 – Disturbance Reporting					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Group available to the affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load-Serving Entity immediately affected by the disturbance for the purpose of providing any needed assistance in the investigation and to assist in the preparation of a final report.					for the purpose of providing any needed assistance in the investigation and to assist in the preparation of a final report.
R4	<i>Proposed Change</i>	N/A	N/A	N/A	N/A
Explanation – 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. As such, VSLs for this requirement are inappropriate.					
R5. The Regional Reliability Organization shall track and review the status of all final report recommendations at least twice each year to ensure they are being acted upon in a timely manner. If any recommendation has not been acted on within two years, or if Regional Reliability Organization tracking and review indicates at any time that any recommendation is not being acted on with sufficient diligence, the Regional Reliability Organization shall notify the NERC Planning Committee and Operating Committee of the status of the recommendation(s) and the steps the Regional Reliability Organization has taken to accelerate implementation.	<i>Balloted Language</i>	The Regional Reliability Organization reviewed all final report recommendations less than twice a year.	The Regional Reliability Organization reviewed 75% or more final report recommendations twice a year.	The Regional Reliability Organization has not reported on any recommendation has not been acted on within two years to the NERC Planning and Operating Committees.	The Regional Reliability Organization has not reviewed the final report recommendations or did not notify the NERC Planning and Operating Committees.
R5	<i>Proposed Change</i>	N/A	N/A	N/A	N/A

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-004-1 – Disturbance Reporting

VSL

Lower

Moderate

High

Severe

Explanation – 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. As such, VSLs for this requirement are inappropriate.

EOP-005-1 – System Restoration Plans					
	VSL	Lower	Moderate	High	Severe
R1. Each Transmission Operator shall have a restoration plan to reestablish its electric system in a stable and orderly manner in the event of a partial or total shutdown of its system, including necessary operating instructions and procedures to cover emergency conditions, and the loss of vital telecommunications channels. Each Transmission Operator shall include the applicable elements listed in Attachment 1-EOP-005 in developing a restoration plan.	<i>Balloted Language</i>	The responsible entity has a restoration plan that includes 75 % or more but less than 100% of the applicable elements listed in Attachment 1.	The responsible entity has a restoration plan that includes 50% to 75% of the applicable elements listed in Attachment 1.	The responsible entity has a restoration plan that includes 25% - 50% of the applicable elements listed in Attachment 1.	The responsible entity has a restoration plan that includes less than 25% of the applicable elements listed in Attachment 1 OR the responsible entity has no restoration plan.
R1	<i>Proposed Change</i>	The Transmission Operator did not include one of the applicable elements listed in Attachment 1-EOP-005 in developing a restoration plan.	The Transmission Operator did not include two of the applicable elements listed in Attachment 1-EOP-005 in developing a restoration plan.	The Transmission Operator did not include three the applicable elements listed in Attachment 1-EOP-005 in developing a restoration plan.	The Transmission Operator did not include four or more of the applicable elements listed in Attachment 1-EOP-005 in developing a restoration plan. OR The Transmission Operator does not have a restoration plan.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					
R11. Following a disturbance in which one or more areas of the Bulk Electric System become isolated or blacked out, the affected Transmission Operators and Balancing Authorities shall begin immediately to return the	<i>Balloted Language</i>	The responsible entity failed to comply with less than 25% of the number of sub-components.	The responsible entity failed to comply with 25% or more and less than 50% of the number of sub-components.	The responsible entity failed to comply with 50% or more and less than 75% of the number of sub-components.	The responsible entity failed to comply with more than 75% of the number of sub-components.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-005-1 – System Restoration Plans

	VSL	Lower	Moderate	High	Severe
Bulk Electric System to normal.					
R11.1. The affected Transmission Operators and Balancing Authorities shall work in conjunction with their Reliability Coordinator(s) to determine the extent and condition of the isolated area(s).	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity failed to work in conjunction with their Reliability Coordinator to determine the extent and condition of the isolated area(s)
R11.2. The affected Transmission Operators and Balancing Authorities shall take the necessary actions to restore Bulk Electric System frequency to normal, including adjusting generation, placing additional generators on line, or load shedding.	<i>Balloted Language</i>	N/A	N/A	N/A	The affected Transmission Operators and Balancing Authorities failed to take the necessary actions to restore Bulk Electric System frequency to normal.
R11.3. The affected Balancing Authorities, working with their Reliability Coordinator(s), shall immediately review the Interchange Schedules between those Balancing Authority Areas or fragments of those Balancing Authority Areas within the separated area and make adjustments as needed to facilitate the restoration. The affected Balancing Authorities shall make all attempts to maintain the adjusted Interchange Schedules, whether generation control is manual or automatic.	<i>Balloted Language</i>	N/A	N/A	The responsible entity failed to make all attempts to maintain adjusted Interchange Schedules as required in R11.3	The responsible entity failed to immediately review the Interchange Schedules between those Balancing Authority Areas or fragments of those Balancing Authority Areas within the separated area and make adjustments to facilitate the restoration as required in R11.3.
R11.4. The affected Transmission Operators shall give high priority to restoration of off-site power to	<i>Balloted Language</i>	N/A	N/A	N/A	The affected Transmission Operators failed to give high priority

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-005-1 – System Restoration Plans

	VSL	Lower	Moderate	High	Severe
nuclear stations.					to restoration of off-site power to nuclear stations.
R11	<i>Proposed Change</i>	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, R11.3, and R11.4.	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, R11.3, and R11.4.	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, R11.3, and R11.4.	The responsible entity immediately began to restore the Bulk Electric System to normal but failed to comply with all of the subrequirements R11.1, R11.2, R11.3, and R11.4. OR The responsible entity did not immediately begin to restore the Bulk Electric System to normal.

Explanation – The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.

EOP-005-2 – System Restoration Plans					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Each Transmission Operator shall have a restoration plan approved by its Reliability Coordinator. The restoration plan shall allow for restoring the Transmission Operator's System following a Disturbance in which one or more areas of the Bulk Electric System (BES) shuts down and the use of Blackstart Resources is required to restore the shut down area to service, to a state whereby the choice of the next Load to be restored is not driven by the need to control frequency or voltage regardless of whether the Blackstart Resource is located within the Transmission Operator's System. The restoration plan shall include:	<i>Balloted Language</i>	The Transmission Operator has an approved plan but failed to comply with one of the sub-requirements within the requirement.	The Transmission Operator has an approved plan but failed to comply with two of the sub-requirements within the requirement.	The Transmission Operator has an approved plan but failed to comply with three of the sub-requirements within the requirement.	The Transmission Operator does not have an approved restoration plan.
R1	<i>Proposed Change</i>	The Transmission Operator has an approved plan but failed to comply with one of the sub-requirements within the requirement.	The Transmission Operator has an approved plan but failed to comply with two of the sub-requirements within the requirement.	The Transmission Operator has an approved plan but failed to comply with three of the sub-requirements within the requirement.	The Transmission Operator has an approved plan but failed to comply with four or more of the sub-requirements within the requirement. OR The Transmission Operator does not have an approved restoration plan.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-005-2 – System Restoration Plans

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					
R6. Each Transmission Operator shall verify through analysis of actual events, steady state and dynamic simulations, or testing that its restoration plan accomplishes its intended function. This shall be completed every five years at a minimum. Such analysis, simulations or testing shall verify:	<i>Balloted Language</i>	The Transmission Operator performed the verification within the required timeframe but did not comply with one of the sub-requirements.	The Transmission Operator performed the verification within the required timeframe but did not comply with two of the sub-requirements.	The Transmission Operator performed the verification but did not complete it within the five calendar year period.	The Transmission Operator did not perform the verification or it took more than six calendar years to complete the verification. OR The Transmission Operator performed the verification within the required timeframe but did not comply with any of the sub-requirements.
R6	<i>Proposed Change</i>	The Transmission Operator performed the verification within the required timeframe but did not comply with one of the sub-requirements.	The Transmission Operator performed the verification within the required timeframe but did not comply with two of the sub-requirements.	The Transmission Operator performed the verification but did not complete it within the five calendar year period.	The Transmission Operator did not perform the verification or it took more than six calendar years to complete the verification. OR The Transmission Operator performed the verification within the required timeframe but did not comply with three of the sub-requirements.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R7. Following a Disturbance in which one or more areas of the BES shuts down and the use of Blackstart Resources is required to restore the shut down area to service, each	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission Operator did not implement its restoration plan following a Disturbance in which Blackstart Resources

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-005-2 – System Restoration Plans

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
affected Transmission Operator shall implement its restoration plan. If the restoration plan cannot be executed as expected the Transmission Operator shall utilize its restoration strategies to facilitate restoration.					have been utilized in restoring the shut down area of the BES. Or, if the restoration plan cannot be executed as expected, the Transmission Operator did not utilize its restoration plan strategies to facilitate restoration.
R7	<i>Proposed Change</i>	N/A	N/A	N/A	<p>The Transmission Operator did not implement its restoration plan following a Disturbance in which Blackstart Resources were required for restoring the shut down area of the BES.</p> <p>OR</p> <p>If the restoration plan could not be executed as expected, the Transmission Operator did not utilize its restoration plan strategies to facilitate restoration.</p>
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					
R8. Following a Disturbance in which one or more areas of the BES shuts down and the use of Blackstart Resources is required to restore the shut down area to service, the Transmission Operator shall	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission Operator resynchronized without approval of the Reliability Coordinator or not in accordance with the established procedures of the

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-005-2 – System Restoration Plans

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
resynchronize area(s) with neighboring Transmission Operator area(s) only with the authorization of the Reliability Coordinator or in accordance with the established procedures of the Reliability Coordinator.					Reliability Coordinator following a Disturbance in which Blackstart Resources have been utilized in restoring the shut down area of the BES to service.
R8	<i>Proposed Change</i>	N/A	N/A	N/A	The Transmission Operator resynchronized without approval of the Reliability Coordinator or not in accordance with the established procedures of the Reliability Coordinator following a Disturbance in which Blackstart Resources were required for restoring the shut down area of the BES to service.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					
R11. Each Transmission Operator, each applicable Transmission Owner, and each applicable Distribution Provider shall provide a minimum of two hours of System restoration training every two calendar years to their field switching personnel identified as performing unique tasks associated with the Transmission Operator’s restoration plan that are outside of their normal tasks.	<i>Balloted Language</i>	The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider did not train less than or equal to 10% of the personnel required by Requirement R11 within a two calendar year period.	The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider did not train more than 10% and less than or equal to 25% of the personnel required by Requirement R11 within a two calendar year period.	The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider did not train more than 25% and less than or equal to 50% of the personnel required by Requirement R11 within a two calendar year period.	The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider did not train more than 50 % of the personnel required by Requirement R11 within a two calendar year period.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-005-2 – System Restoration Plans

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R11	<i>Proposed Change</i>	The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider trained less than 100% but not less than 90% of the personnel required by Requirement R11 within a two calendar year period.	The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider trained less than 90% but not less than 75% of the personnel required by Requirement R11 within a two calendar year period.	The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider trained less than 75% but not less than 50% of the personnel required by Requirement R11 within a two calendar year period.	The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider trained less than 50 % of the personnel required by Requirement R11 within a two calendar year period.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R15. Each Generator Operator with a Blackstart Resource shall notify its Transmission Operator of any known changes to the capabilities of that Blackstart Resource affecting the ability to meet the Transmission Operator’s restoration plan within 24 hours following such change.	<i>Balloted Language</i>	The Generator Operator with a Blackstart Resource did not notify the Transmission Operator of a change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan within 24 hours but did make the notification within 48 hours.	The Generator Operator with a Blackstart Resource did not notify the Transmission Operator of a change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan within 24 hours but did make the notification within 72 hours.	The Generator Operator with a Blackstart Resource did not notify the Transmission Operator of a change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan within 24 hours but did make the notification within 96 hours.	The Generator Operator with a Blackstart Resource did not notify the Transmission Operator of a change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan for more than 96 hours.
R15	<i>Proposed Change</i>	The Generator Operator with a Blackstart Resource did not notify the Transmission Operator of a change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan within 24 hours but did make the notification within 48 hours.	The Generator Operator with a Blackstart Resource did not notify the Transmission Operator of a change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan within 48 hours but did make the notification within 72 hours.	The Generator Operator with a Blackstart Resource did not notify the Transmission Operator of a change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan within 72 hours but did make the notification within 96 hours.	The Generator Operator with a Blackstart Resource did not notify the Transmission Operator of a change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan within 96 hours.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-005-2 – System Restoration Plans

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R16. Each Generator Operator with a Blackstart Resource shall perform Blackstart Resource tests, and maintain records of such testing, in accordance with the testing requirements set by the Transmission Operator to verify that the Blackstart Resource can perform as specified in the restoration plan.	<i>Balloted Language</i>	The Generator Operator with a Blackstart Resource did not maintain testing records for one of the requirements for a Blackstart Resource. Or did not supply the Blackstart Resource testing records as requested within 59 calendar days of the request.	The Generator Operator with a Blackstart Resource did not maintain testing records for two of the requirements for a Blackstart Resource. Or did not supply the Blackstart Resource testing records as requested for 60 days to 89 calendar days after the request.	The Generator Operator with a Blackstart Resource did not maintain testing records for three of the requirements for a Blackstart Resource. Or did not supply the Blackstart Resource testing records as requested for 90 to 119 calendar days after the request.	The Generator Operator with a Blackstart Resource did not maintain testing records for a Blackstart Resource. Or did not supply the Blackstart Resource testing records as requested for 120 days or more after the request.
R16	<i>Proposed Change</i>	The Generator Operator with a Blackstart Resource did not maintain testing records for one of the requirements for a Blackstart Resource. OR The Generator Operator with a Blackstart Resource did not supply the Blackstart Resource testing records as requested within 59 calendar days of the request.	The Generator Operator with a Blackstart Resource did not maintain testing records for two of the requirements for a Blackstart Resource. OR 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.	The Generator Operator with a Blackstart Resource did not maintain testing records for three of the requirements for a Blackstart Resource. OR 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.	The Generator Operator with a Blackstart Resource did not maintain testing records for a Blackstart Resource. OR The Generator Operator with a Blackstart Resource did not supply the Blackstart Resource testing records as requested for 120 calendar days or more after the request.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R17. Each Generator Operator with a Blackstart Resource shall provide a minimum of two hours of training every two calendar	<i>Balloted Language</i>	The Generator Operator with a Blackstart Resource did not train less than or equal to 10%	The Generator Operator with a Blackstart Resource did not train more than 10% and less	The Generator Operator with a Blackstart Resource did not train more than 25% and less	The Generator Operator with a Blackstart Resource did not train more than 50% of the

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-005-2 – System Restoration Plans

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
years to each of its operating personnel responsible for the startup of its Blackstart Resource generation units and energizing a bus. The training program shall include training on the following:		of the personnel required by Requirement R17 within a two calendar year period.	than or equal to 25% of the personnel required by Requirement R17 within a two calendar year period.	than or equal to 50% of the personnel required by Requirement R17 within a two calendar year period.	personnel required by Requirement R17 within a two calendar year period.
R17	<i>Proposed Change</i>	The Generator Operator with a Blackstart Resource trained less than 100% but not less than 95% of the personnel required by Requirement R17 within a two calendar year period.	The Generator Operator with a Blackstart Resource trained less than 95% but not less than 90% of the personnel required by Requirement R17 within a two calendar year period.	The Generator Operator with a Blackstart Resource trained less than 90% but not less than 85% of the personnel required by Requirement R17 within a two calendar year period.	The Generator Operator with a Blackstart Resource trained less than 85% of the personnel required by Requirement R17 within a two calendar year period.

Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.

EOP-006-2 – System Restoration Coordination

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Each Reliability Coordinator shall have a Reliability Coordinator Area restoration plan. The scope of the Reliability Coordinator’s restoration plan starts when Blackstart Resources are utilized to re-energize a shut down area of the Bulk Electric System (BES), or separation has occurred between neighboring Reliability Coordinators, or an energized island has been formed on the BES within the Reliability Coordinator Area. The scope of the Reliability Coordinator’s restoration plan ends when all of its Transmission Operators are interconnected and it its Reliability Coordinator Area is connected to all of its neighboring Reliability Coordinator Areas. The restoration plan shall include:	<i>Balloted Language</i>	The Reliability Coordinator failed to include one sub-requirement of Requirement R1 within its restoration plan.	The Reliability Coordinator failed to include two sub-requirements of Requirement R1 within its restoration plan.	The Reliability Coordinator failed to include three of the sub-requirements of Requirement R1 within its restoration plan.	The Reliability Coordinator failed to include four or more of the sub-requirements within its restoration plan.
R1	<i>Proposed Change</i>	The Reliability Coordinator failed to include one sub-requirement of Requirement R1 within its restoration plan.	The Reliability Coordinator failed to include two sub-requirements of Requirement R1 within its restoration plan.	The Reliability Coordinator failed to include three of the sub-requirements of Requirement R1 within its restoration plan.	The Reliability Coordinator failed to include four or more of the sub-requirements within its restoration plan. OR The scope of the Reliability Coordinator’s restoration plan does not cover the period

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-006-2 – System Restoration Coordination

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					described in Requirement R1. OR The Reliability Coordinator does not have a restoration plan.

Explanation – The VSLs were modified to be consistent with FERC Guideline 3.

R2. The Reliability Coordinator shall distribute its most recent Reliability Coordinator Area restoration plan to each of its Transmission Operators and neighboring Reliability Coordinators within 30 calendar days of creation or revision.	<i>Balloted Language</i>	The Reliability Coordinator distributed the most recent Reliability Coordinator Area restoration plan to the entities identified in Requirement R2 but was more than 30 calendar days late but less than 60 calendar days late.	The Reliability Coordinator distributed the most recent Reliability Coordinator Area restoration plan to the entities identified in Requirement R2 but was 60 calendar days or more late, but less than 90 calendar days late.	The Reliability Coordinator distributed the most recent Reliability Coordinator Area restoration plan to the entities identified in Requirement R2 but was 90 or more calendar days late but less than 120 calendar days late.	The Reliability Coordinator distributed the most recent Reliability Coordinator Area restoration plan to entities identified in Requirement R2 but was 120 calendar days or more late.
R2	<i>Proposed Change</i>	The Reliability Coordinator distributed the most recent Reliability Coordinator Area restoration plan to the entities identified in Requirement R2 but was more than 30 calendar days late but less than 60 calendar days late. OR The Reliability Coordinator distributed the most recent Reliability Coordinator Area restoration plan to all but one of the entities	The Reliability Coordinator distributed the most recent Reliability Coordinator Area restoration plan to the entities identified in Requirement R2 but was 60 calendar days or more late, but less than or equal to 70 calendar days late. OR The Reliability Coordinator distributed the most recent Reliability Coordinator Area restoration plan to	The Reliability Coordinator distributed the most recent Reliability Coordinator Area restoration plan to the entities identified in Requirement R2 but was 70 or more calendar days late but less than or equal to 80 calendar days late. OR The Reliability Coordinator distributed the most recent Reliability Coordinator Area restoration plan to	The Reliability Coordinator distributed the most recent Reliability Coordinator Area restoration plan to entities identified in Requirement R2 but was more than 80 calendar days late. OR The Reliability Coordinator did not distribute the most recent Reliability Coordinator Area restoration plan to four or more of the entities identified in

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-006-2 – System Restoration Coordination

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		identified in Requirement R2.	all but two of the entities identified in Requirement R2.	all but three of the entities identified in Requirement R2.	Requirement R2.

Explanation – The VSLs were modified to be consistent with FERC Guideline 3 and for consistency with other VSLs

R4. Each Reliability Coordinator shall review their neighboring Reliability Coordinator’s restoration plans.	<i>Balloted Language</i>	The Reliability Coordinator did not review and resolve conflicts with the submitted restoration plans from its neighboring Reliability Coordinators within 30 calendar days but did resolve conflicts within 60 calendar days.	The Reliability Coordinator did not review and resolve conflicts with the submitted restoration plans from its neighboring Reliability Coordinators within 30 calendar days but did resolve conflicts within 90 calendar days.	The Reliability Coordinator did not review and resolve conflicts with the submitted restoration plans from its neighboring Reliability Coordinators within 30 calendar days but did resolve conflicts within 120 calendar days.	The Reliability Coordinator did not review and resolve conflicts with the submitted restoration plans from its neighboring Reliability Coordinators within 120 calendar days.
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	<i>Proposed Change</i>	The Reliability Coordinator did not resolve identified conflicts with the submitted restoration plans from its neighboring Reliability Coordinators within 30 calendar days of their discovery but did resolve conflicts within 60 calendar days of their discovery.	The Reliability Coordinator did not resolve identified conflicts with the submitted restoration plans from its neighboring Reliability Coordinators within 60 calendar days of their discovery but did resolve conflicts within 70 calendar days of their discovery.	The Reliability Coordinator did not resolve identified conflicts with the submitted restoration plans from its neighboring Reliability Coordinators within 70 calendar days of their discovery but did resolve conflicts within 80 calendar days of their discovery.	R4
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Explanation – The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs.

R5. Each Reliability Coordinator shall review the restoration plans required by EOP-005 of the Transmission Operators within its Reliability Coordinator Area.	<i>Balloted Language</i>	The Reliability Coordinator did not review and approve/disapprove the submitted restoration plans from its Transmission Operators and neighboring	The Reliability Coordinator did not review and approve/disapprove the submitted restoration plans from its Transmission Operators and neighboring	The Reliability Coordinator did not review and approve/disapprove the submitted restoration plans from its Transmission Operators and neighboring	The Reliability Coordinator did not review and approve/disapprove the submitted restoration plans from its Transmission Operators and neighboring
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Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-006-2 – System Restoration Coordination

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		Reliability Coordinators within 30 calendar days of receipt but did review and approve/disapprove the plans within 45 calendar days of receipt. OR The Reliability Coordinator failed to notify the Transmission Operator of its approval or disapproval with stated reasons for disapproval within 30 calendar days of receipt but did notify the Transmission Operator of its approval or disapproval with reasons within 45 calendar days of receipt.	Reliability Coordinators within 30 calendar days of receipt but did review and approve/disapprove the plans within 60 calendar days of receipt. OR The Reliability Coordinator failed to notify the Transmission Operator of its approval or disapproval with stated reasons for disapproval within 30 calendar days of receipt, but did notify the Transmission Operator of its approval or disapproval with reasons within 60 calendar days of receipt	Reliability Coordinators within 30 calendar days of receipt but did review and approve/disapprove the plans within 90 calendar days of receipt. OR The Reliability Coordinator failed to notify the Transmission Operator of its approval or disapproval with stated reasons for disapproval within 30 calendar days of receipt but did notify the Transmission Operator of its approval or disapproval with reasons within 90 calendar days of receipt.	Reliability Coordinators for more than 90 calendar days of receipt. OR The Reliability Coordinator failed to notify the Transmission Operator of its approval or disapproval with stated reasons for disapproval for more than 90 calendar days of receipt.
R5	<i>Proposed Change</i>	The Reliability Coordinator did not review and approve/disapprove the submitted restoration plans from its Transmission Operators within 30 calendar days of receipt but did review and approve/disapprove the plans within 45 calendar days of receipt. OR The Reliability Coordinator failed to	The Reliability Coordinator did not review and approve/disapprove the submitted restoration plans from its Transmission Operators within 45 calendar days of receipt but did review and approve/disapprove the plans within 55 calendar days of receipt. OR The Reliability Coordinator failed to	The Reliability Coordinator did not review and approve/disapprove the submitted restoration plans from its Transmission Operators within 55 calendar days of receipt but did review and approve/disapprove the plans within 65 calendar days of receipt. OR The Reliability Coordinator failed to	The Reliability Coordinator did not review and approve/disapprove the submitted restoration plans from its Transmission Operators for more than 65 calendar days of receipt. OR The Reliability Coordinator failed to notify the Transmission Operator of its approval or disapproval with

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-006-2 – System Restoration Coordination

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		notify the Transmission Operator of its approval or disapproval with stated reasons for disapproval within 30 calendar days of receipt but did notify the Transmission Operator of its approval or disapproval with reasons within 45 calendar days of receipt.	notify the Transmission Operator of its approval or disapproval with stated reasons for disapproval within 45 calendar days of receipt, but did notify the Transmission Operator of its approval or disapproval with reasons within 55 calendar days of receipt	notify the Transmission Operator of its approval or disapproval with stated reasons for disapproval within 55 calendar days of receipt but did notify the Transmission Operator of its approval or disapproval with reasons within 65 calendar days of receipt.	stated reasons for disapproval for more than 65 calendar days of receipt.

Explanation – The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs.

R8. The Reliability Coordinator shall coordinate or authorize resynchronizing islanded areas that bridge boundaries between Transmission Operators or Reliability Coordinators. If the resynchronization cannot be completed as expected the Reliability Coordinator shall utilize its restoration plan strategies to facilitate resynchronization.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator did not coordinate or authorize resynchronizing islanded areas that bridge boundaries between Transmission Operators or Reliability Coordinators.
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R8	<i>Proposed Change</i>	N/A	N/A	N/A	The Reliability Coordinator did not coordinate or determine whether or not to authorize resynchronizing islanded areas that bridge boundaries between Transmission Operators or Reliability Coordinators.
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Explanation – The VSLs were modified to be consistent with FERC Guideline 2B.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-006-2 – System Restoration Coordination

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R9. Each Reliability Coordinator shall include within its operations training program, annual System restoration training for its System Operators to assure the proper execution of its restoration plan. This training program shall address the following:	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator supplied annual System restoration training but did not address both of the sub-requirements. OR The Reliability Coordinator supplied the required System restoration training but it was over two calendar years from the last training offered.
R9	<i>Proposed Change</i>	N/A	N/A	N/A	The Reliability Coordinator supplied annual System restoration training but did not address one or more 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.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs.					
R10. Each Reliability Coordinator shall conduct two System restoration drills, exercises, or simulations per calendar year, which shall include the Transmission Operators and Generator	<i>Balloted Language</i>	The Reliability Coordinator only held one restoration drill, exercise, or simulation during the calendar year.	The Reliability Coordinator did not invite a Transmission Operator or Generator Operator identified in its restoration plan to participate in a drill,	N/A	The Reliability Coordinator did not hold a restoration drill, exercise, or simulation during the calendar year.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-006-2 – System Restoration Coordination

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Operators as dictated by the particular scope of the drill, exercise, or simulation that is being conducted.			exercise, or simulation within two calendar years.		
R10	<i>Proposed Change</i>	The Reliability Coordinator only held one restoration drill, exercise, or simulation during the calendar year.	The Reliability Coordinator did not request a Transmission Operator or Generator Operator identified in its restoration plan to participate in a drill, exercise, or simulation at least once every two calendar years.	N/A	The Reliability Coordinator held no restoration drills, exercises, or simulations during the calendar year.

Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.

EOP-008-0 – Plans for Loss of Control Center Functionality					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Each Reliability Coordinator, Transmission Operator and Balancing Authority shall have a plan to continue reliability operations in the event its control center becomes inoperable. The contingency plan must meet the following requirements:	<i>Balloted Language</i>	The Reliability Coordinator, Transmission Operator and Balancing Authority failed to comply with one of the sub-requirements.	The Reliability Coordinator, Transmission Operator and Balancing Authority failed to comply with two of the sub-requirements.	The Reliability Coordinator, Transmission Operator and Balancing Authority failed to comply with three or four of the sub-requirements.	The Reliability Coordinator, Transmission Operator and Balancing Authority failed to comply with more than four of the sub-requirements.
R1.1. The contingency plan shall not rely on data or voice communication from the primary control facility to be viable.	<i>Balloted Language</i>	The responsible entity's contingency plan relies on data or voice communication from the primary control facility for up to 25% of the functions identified in R1.2 and R1.3.	The responsible entity's contingency plan relies on data or voice communication from the primary control facility for 25% to 50% of the functions identified in R1.2 and R1.3.	The responsible entity's contingency plan relies on data or voice communication from the primary control facility for 50% to 75% of the functions identified in R1.2 and R1.3.	The responsible entity's contingency plan relies on data and voice communication from the primary control facility for more than 75% of the functions identified in R1.2 and R1.3.
R1.2. The plan shall include procedures and responsibilities for providing basic tie line control and procedures and for maintaining the status of all inter-area schedules, such that there is an hourly accounting of all schedules.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity's plan failed to include procedures and responsibilities for providing basic tie line control and procedures and for maintaining the status of all inter-area schedules, such that there is an hourly accounting of all schedules.
R1.3. The contingency plan must address monitoring and control of critical transmission facilities, generation control, voltage control, time and frequency control, control of critical substation devices, and	<i>Balloted Language</i>	The responsible entity's contingency plan failed to address one of the elements listed in the requirement.	The responsible entity's contingency plan failed to address two of the elements listed in the requirement.	The responsible entity's contingency plan failed to address three of the elements listed in the requirement.	The responsible entity's contingency plan failed to address four or more of the elements listed in the requirement.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-008-0 – Plans for Loss of Control Center Functionality					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
logging of significant power system events. The plan shall list the critical facilities.					
R1.4. The plan shall include procedures and responsibilities for maintaining basic voice communication capabilities with other areas.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity's plan failed to include procedures and responsibilities for maintaining basic voice communication capabilities with other areas.
R1.5. The plan shall include procedures and responsibilities for conducting periodic tests, at least annually, to ensure viability of the plan.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity's plan failed to include procedures and responsibilities for conducting periodic tests, at least annually, to ensure viability of the plan.
R1.6. The plan shall include procedures and responsibilities for providing annual training to ensure that operating personnel are able to implement the contingency plans.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity's plan failed to include procedures and responsibilities for providing annual training to ensure that operating personnel are able to implement the contingency plans.
R1.7. The plan shall be reviewed and updated annually.	<i>Balloted Language</i>	The responsible entity's plan was reviewed within 3 months of passing its annual review date.	The responsible entity's plan was reviewed within 6 months of passing its annual review date.	The responsible entity's plan was reviewed within 9 months of passing its annual review date.	The responsible entity's plan was reviewed more than 9 months of passing its annual review date.
R1.8. The plan shall be reviewed and updated annually.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity failed to make interim provisions when it is took more than one hour to implement the

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

EOP-008-0 – Plans for Loss of Control Center Functionality					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					contingency plan for loss of primary control facility.
R1	<i>Proposed Change</i>	The responsible entity's plan to continue reliability operations in the event its control center becomes inoperable failed to comply with one (1) of the sub-requirements (R1.1, R1.2, R1.3, R1.4, R1.5, R1.6, R1.7, or R1.8).	The responsible entity's plan to continue reliability operations in the event its control center becomes inoperable failed to comply with two (2) of the subrequirements (R1.1, R1.2, R1.3, R1.4, R1.5, R1.6, R1.7, or R1.8).	The responsible entity's plan to continue reliability operations in the event its control center becomes inoperable failed to comply with three (3) or four (4) of the subrequirements (R1.1, R1.2, R1.3, R1.4, R1.5, R1.6, R1.7, or R1.8).	The responsible entity's plan to continue reliability operations in the event its control center becomes inoperable failed to comply with more than four (4) of the subrequirements (R1.1, R1.2, R1.3, R1.4, R1.5, R1.6, R1.7, or R1.8).
Explanation – Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					

EOP-009-0 - Documentation of Blackstart Generating Unit Test Results					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. The Generator Operator of each blackstart generating unit shall test the startup and operation of each system blackstart generating unit identified in the BCP as required in the Regional BCP (Reliability Standard EOP-007-0_R1). Testing records shall include the dates of the tests, the duration of the tests, and an indication of whether the tests met Regional BCP requirements.	<i>Balloted Language</i>	The Generator Operator Blackstart unit testing and recording is missing minor program/procedural elements.	Startup and testing of each Blackstart unit was performed, but the testing records are incomplete. The testing records are missing 25% or less of data requested in the requirement'.	The Generator Operator's failed to test 25% or less of the Blackstart units or testing records are incomplete. The testing records are missing between 25% and 50% of data requested in the requirement.	The Generator Operator failed to test more than 25% of its Blackstart units or does not have Blackstart testing records or is missing more than 50% of the required data.
R1	<i>Proposed Change</i>	<p>The Generator Operator failed to test 5% or less of the required blackstart units.</p> <p>OR</p> <p>The Generator Operator's testing records for Requirement R1 are missing 5% or less of the required information.</p>	<p>The Generator Operator failed to test more than 5% up to (and including) 10% of the required blackstart units.</p> <p>OR</p> <p>The Generator Operator's testing records for Requirement R1 are missing 5% or more but less than 10% of the required information.</p>	<p>The Generator Operator failed to test more than 10% up to (and including) 15% of the required blackstart units.</p> <p>OR</p> <p>The Generator Operator's testing records for Requirement R1 are missing 10% or more but less than 15% of the required information.</p>	<p>The Generator Operator failed to test more than 15% of the required blackstart units.</p> <p>OR</p> <p>The Generator Operator's testing records for Requirement R1 are missing 15% or more of the required information.</p>
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					

PER-002-0 - Operating Personnel Training

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R3. For personnel identified in Requirement R2, the Transmission Operator and Balancing Authority shall provide a training program meeting the following criteria:	<i>Balloted Language</i>	The applicable entity did not comply with one of the four required elements.	The applicable entity did not comply with two of the four required elements.	The applicable entity did not comply with three of the four required elements.	The applicable entity did not comply with any of the four required elements.
R3.1. A set of training program objectives must be defined, based on NERC and Regional Reliability Organization standards, entity operating procedures, and applicable regulatory requirements. These objectives shall reference the knowledge and competencies needed to apply those standards, procedures, and requirements to normal, emergency, and restoration conditions for the Transmission Operator and Balancing Authority operating positions.	<i>Balloted Language</i>	The responsible entity's training program objectives were incomplete (e.g. The responsible entity failed to define training program objectives for less than 25% of the applicable BA and TOP NERC and Regional Reliability Organizations standards, entity operating procedures, and regulatory requirements.)	The responsible entity's training program objectives were incomplete (e.g. The responsible entity failed to define training program objectives for 25% or more but less than 50% of the applicable BA & TOP NERC and Regional Reliability Organizations standards, entity operating procedures, and regulatory requirements.)	The responsible entity's training program objectives were incomplete (e.g. The responsible entity failed to define training program objectives for 50% or more but less than 75% of the applicable BA & TOP NERC and Regional Reliability Organizations standards, entity operating procedures, and regulatory requirements.)	The responsible entity's training program objectives were incomplete (e.g. The responsible entity failed to define training program objectives for 75% or more of the applicable BA & TOP NERC and Regional Reliability Organizations standards, entity operating procedures, and regulatory requirements.)
R3.2. The training program must include a plan for the initial and continuing training of Transmission Operator and Balancing Authority operating personnel. That plan shall address knowledge and competencies required for reliable system operations.	<i>Balloted Language</i>	The responsible entity does not have a plan for continuing training of operating personnel. OR The responsible entity does not have a plan for initial training of operating personnel. OR The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.	The responsible entity does not have a plan for continuing training of operating personnel. OR The responsible entity does not have a plan for initial training of operating personnel. AND The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.	The responsible entity does not have a plan for continuing training of operating personnel. AND The responsible entity does not have a plan for initial training of operating personnel. OR The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.	The responsible entity does not have a plan for continuing training of operating personnel. AND The responsible entity does not have a plan for initial training of operating personnel. AND The responsible entity's plan does not address the knowledge and competencies required for reliable system operations.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

PER-002-0 - Operating Personnel Training

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R3.3. The training program must include training time for all Transmission Operator and Balancing Authority operating personnel to ensure their operating proficiency.	<i>Balloted Language</i>	The responsible entity has produced the training program with more than 75% but less than 100% of operating personnel provided with training time.	The responsible entity has produced the training program with more than 50% but less than or equal to 75% of operating personnel provided with training time.	The responsible entity has produced the training program with more than 25% but less than or equal to 50% of operating personnel provided with training time.	The responsible entity has produced the training program with more than or equal to 0% but less than or equal to 25% of operating personnel provided with training time.
R3.4. Training staff must be identified, and the staff must be competent in both knowledge of system operations and instructional capabilities.	<i>Balloted Language</i>	N/A	The responsible entity has produced the training program with training staff identified that lacks knowledge of system operations. OR The responsible entity has produced the training program with training staff identified that lacks instructional capabilities.	The responsible entity has produced the training program with training staff identified that lacks knowledge of system operations. AND The responsible entity has produced the training program with training staff identified that lacks instructional capabilities.	The responsible entity has produced the training program with no training staff identified.
R3	<i>Proposed Change</i>	The responsible entity provided a training program that did not comply with one of the following subrequirements: R3.1, R3.2, R3.3, or R3.4.	The responsible entity provided a training program that did not comply with two of the following subrequirements: R3.1, R3.2, R3.3, or R3.4.	The responsible entity provided a training program that did not comply with three of the following subrequirements: R3.1, R3.2, R3.3, or R3.4.	The responsible entity provided a training program that did not comply with any of the following subrequirements: R3.1, R3.2, R3.3, and R3.4. OR The responsible entity did not provide a training program.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

PER-002-0 - Operating Personnel Training

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Explanation – The VSLs were modified to be consistent with FERC Guideline 3. Consistent with Guidelines filed with FERC on August 11, 2009, the VSLDT incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					

PER-004-1 – Reliability Coordination Staffing

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R5. Reliability Coordinator operating personnel shall place particular attention on SOLs and IROLs and inter-tie facility limits. The Reliability Coordinator shall ensure protocols are in place to allow Reliability Coordinator operating personnel to have the best available information at all times.	<i>Balloted Language</i>	Reliability Coordinator has failed to provide its operating personnel with less than 25% of the SOL and IROL limits and for inter-tie facility limits OR the protocols to ensure best available data at all times is not in place.	Reliability Coordinator has failed to provide its operating personnel with 25% or more and less than 50% of the SOL and IROL limits and for inter-tie facility limits.	Reliability Coordinator has failed to provide its operating personnel with 50% or more and less than 75% of the SOL and IROL limits and for inter-tie facility limits.	Reliability Coordinator has failed to provide its operating personnel with 75% or more of the SOL and IROL limits and for inter-tie facility limits.
R5	<i>Proposed Change</i>	Reliability Coordinator operating personnel did not place particular attention on 5% or less of the SOLs or IROLs or inter-tie facility limits.	Reliability Coordinator operating personnel did not place particular attention on more than 5% up to (and including) 10% of the SOLs or IROLs or inter-tie facility limits.	Reliability Coordinator operating personnel did not place particular attention on more than 10% up to (and including) 15% of the SOLs or IROLs or inter-tie facility limits.	Reliability Coordinator operating personnel did not place particular attention on more than 15% of the SOLs or IROLs or inter-tie facility limits. OR The Reliability Coordinator did not ensure protocols are in place to allow Reliability Coordinator operating personnel to have the best available information at all times.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

PER-004-1 – Reliability Coordination Staffing

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Explanation – The VSLs were modified to be consistent with FERC Guidelines 1 and 3., as well as for clarity and consistency with other standards and VSLs.					

PER-005-1 – System Personnel Training					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Each Reliability Coordinator, Balancing Authority and Transmission Operator shall use a systematic approach to training to establish a training program for the BES company-specific reliability-related tasks performed by its System Operators and shall implement the program.	<i>Balloted Language</i>	None	The responsible entity failed to provide evidence that it updated its company-specific reliability-related task list to identify new or modified tasks each calendar year (R1.1.1) OR The responsible entity failed to provide evidence of evaluating its training program to identify needed changes to its training program(s). (R1.4)	The responsible entity failed to design and develop learning objectives and training materials based on the BES company specific reliability related tasks. (R1.2)	The responsible entity failed to prepare a company-specific reliability-related task list (R1.1) OR The responsible entity failed to deliver training based on the BES company specific reliability related tasks. (R1.3)
R1	<i>Proposed Change</i>	None	The responsible entity failed update its BES company-specific reliability-related task list to identify new or modified tasks each calendar year (R1.1.1) OR The responsible entity failed to evaluate its training program to identify needed changes to its training program(s). (R1.4)	The responsible entity failed to design and develop learning objectives and training materials based on the BES company specific reliability related tasks. (R1.2)	The responsible entity failed to prepare a BES company-specific reliability-related task list (R1.1) OR The responsible entity failed to deliver training based on the BES company specific reliability related tasks. (R1.3)
Explanation – Modified for clarity and consistency with other standards and VSLs.					
R2. Each Reliability Coordinator, Balancing	<i>Balloted Language</i>	N/A	The responsible entity verified at least 90% but	The responsible entity verified at least 70% but	The responsible entity verified less than 70%

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

PER-005-1 – System Personnel Training

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Authority and Transmission Operator shall verify each of its System Operator's capabilities to perform each assigned task identified in R1.1 at least one time.			less than 100% of its System Operators' capabilities to perform each assigned task from its list of BES company-specific reliability-related tasks. (R2)	less than 90% of its System Operators' capabilities to perform each assigned task from its list of BES company-specific reliability-related tasks. (R2) OR The responsible entity failed to verify its system operator's capabilities to perform each new or modified task within six months of making a modification to its BES company-specific reliability-related task list. (R2.1)	of its System Operators' capabilities to perform each assigned task from its list of BES company-specific reliability-related tasks. (R2)
R2	<i>Proposed Change</i>	N/A	The responsible entity verified at least 90% but less than 100% of its System Operators' capabilities to perform each assigned task from its list of BES company-specific reliability-related tasks. (R2)	The responsible entity verified at least 70% but less than 90% of its System Operators' capabilities to perform each assigned task from its list of BES company-specific reliability-related tasks (R2) OR The responsible entity failed to verify its System Operators capabilities to perform each new or modified task within six months of making a modification to its BES company-specific	The responsible entity verified less than 70% of its System Operators' capabilities to perform each assigned task from its list of BES company-specific reliability-related tasks. (R2)

Staff Proposed Changes to Previously Balloted Violation Severity Levels (COM, EOP, PER)

PER-005-1 – System Personnel Training

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
				reliability-related task list. (R2.1)	
Explanation – Modified for clarity and consistency with other standards and VSLs.					