

Staff Proposed Changes to Previously Balloted Violation Severity Levels (Facilities and Modeling)

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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FAC-001-0 – Facility Connection Requirements

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2. The Transmission Owner's facility connection requirements shall address, but are not limited to, the following items:	<i>Balloted Language</i>	The Transmission Owner's facility connection requirements do not address one to four of the sub-components. (R2.1.1 to R2.1.16)	The Transmission Owner's facility connection requirements do not address five to eight of the sub-components. (R2.1.1 to R2.1.16)	The Transmission Owner's facility connection requirements do not address nine to twelve of the sub-components. (R2.1.1 to R2.1.16)	The Transmission Owner's facility connection requirements do not address thirteen or more of the sub-components. (R2.1.1 to R2.1.16)
R2.1. Provide a written summary of its plans to achieve the required system performance as described above throughout the planning horizon:	<i>Balloted Language</i>	The Transmission Owner's facility connection requirements do not address one to four of the sub-components. (R2.1.1 to R2.1.16)	The Transmission Owner's facility connection requirements do not address five to eight of the sub-components. (R2.1.1 to R2.1.16)	The Transmission Owner's facility connection requirements do not address nine to twelve of the sub-components. (R2.1.1 to R2.1.16)	The Transmission Owner's facility connection requirements do not address thirteen or more of the sub-components. (R2.1.1 to R2.1.16)
R2.1.1. Procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems failed to include this subrequirement.
R2.1.2. Procedures for notification of new or modified facilities to others (those responsible for the reliability of the interconnected transmission systems) as soon as feasible.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems failed to include this subrequirement.
R2.1.3. Voltage level and MW and MVAR capacity or demand	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for

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FAC-001-0 – Facility Connection Requirements

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
at point of connection.					coordinated joint studies of new facilities and their impacts on the interconnected transmission systems failed to include this subrequirement.
R2.1.4. Breaker duty and surge protection.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems failed to include this subrequirement.
R2.1.5. System protection and coordination.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems failed to include this subrequirement.
R2.1.6. Metering and telecommunications.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems failed to include this subrequirement.
R2.1.7. Grounding and safety issues.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for coordinated joint studies

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	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					of new facilities and their impacts on the interconnected transmission systems failed to include this subrequirement.
R2.1.8. Insulation and insulation coordination.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems failed to include this subrequirement.
R2.1.9. Voltage, Reactive Power, and power factor control	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems failed to include this subrequirement.
R2.1.10. Power quality impacts.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems failed to include this subrequirement.
R2.1.11. Equipment Ratings.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for coordinated joint studies of new facilities and their

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	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					impacts on the interconnected transmission systems failed to include this subrequirement.
R.2.1.12. Synchronizing of facilities.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems failed to include this subrequirement.
R.2.1.13. Maintenance coordination.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems failed to include this subrequirement.
R.2.1.14. Operational issues (abnormal frequency and voltages).	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems failed to include this subrequirement.
R.2.1.15. Inspection requirements for existing or new facilities.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for coordinated joint studies of new facilities and their impacts on the

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FAC-001-0 – Facility Connection Requirements

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					interconnected transmission systems failed to include this subrequirement.
R.2.1.16. Communications and procedures during normal and emergency operating conditions.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission owner's procedures for coordinated joint studies of new facilities and their impacts on the interconnected transmission systems failed to include this subrequirement.
R2.	<i>Proposed Change</i>	The Transmission Owner's facility connection requirements failed to address one of the subrequirements.	The Transmission Owner's facility connection requirements failed to address two of the subrequirements.	The Transmission Owner's facility connection requirements failed to address three of the subrequirements.	The Transmission Owner's facility connection requirements failed to address four or more of the subrequirements. OR The Transmission Owner does not have facility connection requirements.

Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs. Consistent with Guidelines filed with FERC on August 11, 2009, incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on including specified components.

FAC-003-1 – Transmission Vegetation Management Program					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R4. The RRO shall report the outage information provided to it by Transmission Owner's, as required by Requirement 3, quarterly to NERC, as well as any actions taken by the RRO as a result of any of the reported outages.	<i>Balloted Language</i>	N/A	N/A	The RRO did not submit a quarterly report to NERC for a single quarter.	The RRO did not submit a quarterly report to NERC for more than two consecutive quarters.
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. Therefore, VSLs for this requirement are inappropriate.					

FAC-009-1 – Establish and Communicate Facility Ratings					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2. The Transmission Owner and Generator Owner shall each provide Facility Ratings for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities to its associated Reliability Coordinator(s), Planning Authority(ies), Transmission Planner(s), and Transmission Operator(s) as scheduled by such requesting entities.	<i>Balloted Language</i>	The Transmission Owner or Generator Owner provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by up to 15 calendar days.	The Transmission Owner or Generator Owner provided its Facility Ratings to all but one of the requesting entities.	The Transmission Owner or Generator Owner provided its Facility Ratings to two of the requesting entities.	The Transmission Owner or Generator Owner has provided its Facility Ratings to none of the requesting entities within 30 calendar days of the associated schedules.
R2	<i>Proposed Change</i>	The responsible entity provided its Facility Ratings to the requesting entity but missed meeting the schedule by up to 15 calendar days.	The responsible entity provided its Facility Ratings to the requesting entity but missed meeting the schedule by more than 15 calendar days but less than or equal to 25 calendar days.	The responsible entity provided its Facility Ratings to the requesting entity but missed meeting the schedule by more than 25 calendar days but less than or equal to 35 calendar days.	The responsible entity provided its Facility Ratings to the requesting entity but missed meeting the schedule by more than 35 calendar days. OR The responsible entity did not provide its Facility Ratings to the requesting entity.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs.					

FAC-010-2.1 - System Operating Limits Methodology for the Planning Horizon					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. The Planning Authority shall have a documented SOL Methodology for use in developing SOLs within its Planning Authority Area. This SOL Methodology shall:	<i>Balloted Language</i>	N/A	The Planning Authority has a documented SOL Methodology for use in developing SOLs within its Planning Authority Area, but it does not address R1.2	The Planning Authority has a documented SOL Methodology for use in developing SOLs within its Planning Authority Area, but it does not address R1.3.	The Planning Authority has a documented SOL Methodology for use in developing SOLs within its Planning Authority Area, but it does not address R1.1. OR The Planning Authority has no documented SOL Methodology for use in developing SOLs within its Planning Authority Area.
R1.1. Be applicable for developing SOLs used in the planning horizon.	<i>Balloted Language</i>	N/A	N/A	N/A	Planning Authority SOL methodology is not applicable for developing SOL in the planning horizon.
R1.2. State that SOLs shall not exceed associated Facility Ratings.	<i>Balloted Language</i>	N/A	N/A	N/A	Planning Authority SOL Methodology did not state that SOLs shall not exceed associated Facility Ratings
R1.3. Include a description of how to identify the subset of SOLs that qualify as IROLS.	<i>Balloted Language</i>	N/A	N/A	N/A	Planning Authority SOL Methodology did not include a description of how to identify the subset of SOLs that qualify as IROLS.
R1	<i>Proposed Change</i>	N/A	The Planning Authority has a documented SOL Methodology for use in developing SOLs within its Planning Authority	The Planning Authority has a documented SOL Methodology for use in developing SOLs within its Planning Authority	The Planning Authority has a documented SOL Methodology for use in developing SOLs within its Planning Authority

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FAC-010-2.1 - System Operating Limits Methodology for the Planning Horizon					
			Area, but it does not address R1.2	Area, but it does not address R1.3.	Area, but it does not address R1.1. OR The Planning Authority has no documented SOL Methodology for use in developing SOLs within its Planning Authority Area.
Explanation – Consistent with Guidelines filed with FERC on August 11, 2009, incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					
R2.1. In the pre-contingency state and with all Facilities in service, the BES shall demonstrate transient, dynamic and voltage stability; all Facilities shall be within their Facility Ratings and within their thermal, voltage and stability limits. In the determination of SOLs, the BES condition used shall reflect expected system conditions and shall reflect changes to system topology such as Facility outages.	<i>Balloted Language</i>	N/A	N/A	N/A	The Planning Authority's methodology does not include a requirement that SOLs provide BES performance consistent with sub-requirement R2.1.
R2.2. Following the single Contingencies identified in Requirement 2.2.1 through Requirement 2.2.3, the system shall demonstrate transient, dynamic and voltage stability; all Facilities shall be operating within their Facility Ratings and within their thermal, voltage and stability limits; and Cascading or uncontrolled separation shall not occur.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The Planning Authority's methodology does not include a requirement that SOLs provide BES performance consistent with sub-requirement R2.2.

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FAC-010-2.1 - System Operating Limits Methodology for the Planning Horizon					
R2.2.1. Single line to ground or three-phase Fault (whichever is more severe), with Normal Clearing, on any Faulted generator, line, transformer, or shunt device.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not address single line to ground or 3-phase Fault (whichever is more severe), with Normal Clearing, on any Faulted generator, line, transformer, or shunt device.
R2.2.2. Loss of any generator, line, transformer, or shunt device without a Fault.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not address the loss of any generator, line, transformer, or shunt device without a Fault.
R2.2.3. Single pole block, with Normal Clearing, in a monopolar or bipolar high voltage direct current system.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not address single pole block, with Normal Clearing, in a monopolar or bipolar high voltage direct current system.
R2.3. Starting with all Facilities in service, the system's response to a single Contingency, may include any of the following:	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not include one or more of the following: 2.3.1. through 2.3.3.
R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The SOL Methodology does not provide that starting with all Facilities in service, the system's response to a single Contingency may include planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or

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FAC-010-2.1 - System Operating Limits Methodology for the Planning Horizon					
					by the affected area.
R2.3.2. System reconfiguration through manual or automatic control or protection actions.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The SOL Methodology does not provide that starting with all Facilities in service, the system's response to a single Contingency may include System reconfiguration through manual or automatic control or protection actions.
R2.4. To prepare for the next Contingency, system adjustments may be made, including changes to generation, uses of the transmission system, and the transmission system topology.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The SOL Methodology does not provide that in order to prepare for the next Contingency, system adjustments may be made, including changes to generation, uses of the transmission system, and the transmission system topology.
R2.5. Starting with all Facilities in service and following any of the multiple Contingencies identified in Reliability Standard TPL-003 the system shall demonstrate transient, dynamic and voltage stability; all Facilities shall be operating within their Facility Ratings and within their thermal, voltage and stability limits; and Cascading or uncontrolled separation shall not occur.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The SOL methodology does not include a requirement that SOLs provide BES performance consistent with sub-requirement R2.5.
R2.6. In determining the system's response to any of the multiple Contingencies, identified in Reliability Standard	<i>Balloted Language</i>	N/A	N/A	N/A	N/A

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FAC-010-2.1 - System Operating Limits Methodology for the Planning Horizon					
TPL-003, in addition to the actions identified in R2.3.1 and R2.3.2, the following shall be acceptable:					
R2.6.1. Planned or controlled interruption of electric supply to customers (load shedding), the planned removal from service of certain generators, and/or the curtailment of contracted Firm (non-recallable reserved) electric power Transfers.	<i>Balloted Language</i>	N/A	N/A	N/A	The SOL Methodology does not provide that in determining the system's response to any of the multiple Contingencies, identified in Reliability Standard TPL-003, in addition to the actions identified in R2.3.1 and R2.3.2, Planned or controlled interruption of electric supply to customers (load shedding), the planned removal from service of certain generators, and/or the curtailment of contracted Firm (non-recallable reserved) electric power Transfers shall be acceptable.
R2	<i>Proposed Change</i>	The Planning Authority's SOL Methodology is missing one requirement as described in R2.1, R2.2, R2.3, R2.4, R2.5, or R2.6.	The Planning Authority's SOL Methodology is missing two requirements as described in R2.1, R2.2, R2.3, R2.4, R2.5, or R2.6.	The Planning Authority's SOL Methodology is missing three requirements as described in R2.1, R2.2, R2.3, R2.4, R2.5, or R2.6.	The Planning Authority's SOL Methodology is missing four or more requirements as described in R2.1, R2.2, R2.3, R2.4, R2.5, or R2.6.
Explanation: Consistent with Guidelines filed with FERC on August 11, 2009, incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					
R3. The Planning Authority's methodology for determining SOLs, shall include, as a minimum, a description of the following, along with any	<i>Balloted Language</i>	The Planning Authority has a methodology for determining SOLs that includes a description for all but one of the	The Planning Authority has a methodology for determining SOLs that includes a description for all but two of the	The Planning Authority has a methodology for determining SOLs that includes a description for all but three of the	The Planning Authority has a methodology for determining SOLs that is missing a description of four or more of the

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FAC-010-2.1 - System Operating Limits Methodology for the Planning Horizon					
reliability margins applied for each:		following: R3.1 through R3.6.	following: R3.1 through R3.6.	following: R3.1 through R3.6.	following: R3.1 through R3.6.
R3.1. Study model (must include at least the entire Planning Authority Area as well as the critical modeling details from other Planning Authority Areas that would impact the Facility or Facilities under study).	<i>Balloted Language</i>	N/A	N/A	N/A	The methodology does not include a study model that includes the entire Planning Authority Area, and the critical modeling details of other Planning Authority Areas that would impact the facility or facilities under study.
R3.2. Selection of applicable Contingencies.	<i>Balloted Language</i>	N/A	N/A	N/A	The methodology does not include the selection of applicable Contingencies.
R3.3. Level of detail of system models used to determine SOLs.	<i>Balloted Language</i>	N/A	N/A	N/A	The methodology does not describe the level of detail of system models used to determine SOLs.
R3.4. Allowed uses of Special Protection Systems or Remedial Action Plans.	<i>Balloted Language</i>	N/A	N/A	N/A	The methodology does not describe the allowed uses of Special Protection Systems or Remedial Action Plans.
R3.5. Anticipated transmission system configuration, generation dispatch and Load level.	<i>Balloted Language</i>	N/A	N/A	N/A	The methodology does not include the description of anticipated transmission system configuration, generation dispatch and Load level.
R3.6. Criteria for determining when violating a SOL qualifies as an Interconnection Reliability Operating Limit (IROL) and criteria for developing any associated IROL Tv.	<i>Balloted Language</i>	N/A	N/A	N/A	The methodology does not include a description of the criteria for determining when violating a SOL qualifies as an Interconnection Reliability Operating Limit (IROL) and criteria for

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FAC-010-2.1 - System Operating Limits Methodology for the Planning Horizon					
					developing any associated IROL Tv.
R3	<i>Proposed Change</i>	The Planning Authority's SOL Methodology includes a description for all but one of the following: R3.1 through R3.6.	The Planning Authority's SOL Methodology includes a description for all but two of the following: R3.1 through R3.6.	The Planning Authority's SOL Methodology includes a description for all but three of the following: R3.1 through R3.6.	The Planning Authority's SOL Methodology is missing a description of four or more of the following: R3.1 through R3.6.
Explanation: No changes to R3; eliminated all VSLs for sub requirements as the VSLs for the sub-requirements are already covered in the VSLs for the main Requirement.					
R4. The Planning Authority shall issue its SOL Methodology, and any change to that methodology, to all of the following prior to the effectiveness of the change:	<i>Balloted Language</i>	<p>One or both of the following: The Planning Authority issued its SOL Methodology and changes to that methodology to all but one of the required entities.</p> <p>For a change in methodology, the changed methodology was provided up to 30 calendar days after the effectiveness of the change.</p>	<p>One of the following: The Planning Authority issued its SOL Methodology and changes to that methodology to all but one of the required entities AND for a change in methodology, the changed methodology was provided 30 calendar days or more, but less than 60 calendar days after the effectiveness of the change. OR The Planning Authority issued its SOL Methodology and changes to that methodology to all but two of the required entities AND for a change in methodology, the changed methodology was provided up to 30</p>	<p>One of the following: The Planning Authority issued its SOL Methodology and changes to that methodology to all but one of the required entities AND for a change in methodology, the changed methodology was provided 60 calendar days or more, but less than 90 calendar days after the effectiveness of the change. OR The Planning Authority issued its SOL Methodology and changes to that methodology to all but two of the required entities AND for a change in methodology, the changed methodology was provided 30 calendar days or more, but less</p>	<p>One of the following: The Planning Authority failed to issue its SOL Methodology and changes to that methodology to more than three of the required entities.</p> <p>The Planning Authority issued its SOL Methodology and changes to that methodology to all but one of the required entities AND for a change in methodology, the changed methodology was provided 90 calendar days or more after the effectiveness of the change. OR The Planning Authority issued its SOL Methodology and changes to that methodology to all but two of the required</p>

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FAC-010-2.1 - System Operating Limits Methodology for the Planning Horizon					
			calendar days after the effectiveness of the change.	than 60 calendar days after the effectiveness of the change. OR The Planning Authority issued its SOL Methodology and changes to that methodology to all but three of the required entities AND for a change in methodology, the changed methodology was provided up to 30 calendar days after the effectiveness of the change.	entities AND for a change in methodology, the changed methodology was provided 60 calendar days or more, but less than 90 calendar days after the effectiveness of the change. OR The Planning Authority issued its SOL Methodology and changes to that methodology to all but three of the required entities AND for a change in methodology, the changed methodology was provided 30 calendar days or more, but less than 60 calendar days after the effectiveness of the change. The Planning Authority issued its SOL Methodology and changes to that methodology to all but four of the required entities AND for a change in methodology, the changed methodology was provided up to 30 calendar days after the effectiveness of the change.
R4.1. Each adjacent Planning Authority and each Planning Authority that indicated it has a reliability-related need for the methodology.	<i>Balloted Language</i>	N/A	N/A	N/A	The Planning Authority did not issue its SOL Methodology and any change to that methodology, prior to the effectiveness of the

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FAC-010-2.1 - System Operating Limits Methodology for the Planning Horizon					
					change, to each adjacent Planning Authority and each Planning Authority that indicated it has a reliability-related need for the methodology.
R4.2. Each Reliability Coordinator and Transmission Operator that operates any portion of the Planning Authority's Planning Authority Area.	<i>Balloted Language</i>	N/A	N/A	N/A	The Planning Authority did not issue its SOL Methodology and any change to that methodology, prior to the effectiveness of the change, to each Reliability Coordinator and Transmission Operator that operates any portion of the Planning Authority's Planning Authority Area.
R4.3. Each Transmission Planner that works in the Planning Authority's Planning Authority Area.	<i>Balloted Language</i>	N/A	N/A	N/A	The Planning Authority did not issue its SOL Methodology and any change to that methodology, prior to the effectiveness of the change, to each Transmission Planner that works in the Planning Authority's Planning Authority Area prior to the effectiveness of the change.
R4	<i>Proposed Change</i>	The Planning Authority failed to issue its SOL Methodology and/or one or more changes to that methodology to one of the required entities specified in R4.1, R4.2,	The Planning Authority failed to issue its SOL Methodology and/or one or more changes to that methodology to two of the required entities specified in R4.1, R4.2,	The Planning Authority failed to issue its SOL Methodology and/or one or more changes to that methodology to three of the required entities specified in R4.1, R4.2,	The Planning Authority failed to issue its SOL Methodology and/or one or more changes to that methodology to four or more of the required entities specified in R4.1,

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FAC-010-2.1 - System Operating Limits Methodology for the Planning Horizon					
		and R4.3. OR For a change in methodology, the changed methodology was not provided to one or more of the required entities before the effectiveness of the change, but was provided to all the required entities no more than 30 calendar days after the effectiveness of the change.	and R4.3. OR For a change in methodology, the changed methodology was provided to one or more of the required entities more than 30 calendar days after the effectiveness of the change, but less than or equal to 40 days after the effectiveness of the change.	and R4.3. OR For a change in methodology, the changed methodology was provided to one or more of required entities more than 40 calendar days after the effectiveness of the change, but less than or equal to 50 days after the effectiveness of the change.	R4.2, and R4.3. OR For a change in methodology, the changed methodology was provided to four or more of the required entities more than 50 calendar days after the effectiveness of the change.
<p>Explanation: Consistent with Guidelines filed with FERC on August 11, 2009, incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.</p> <p>The VSLs were modified for clarity and consistency with other standards and VSLs.</p>					
R5. If a recipient of the SOL Methodology provides documented technical comments on the methodology, the Planning Authority shall provide a documented response to that recipient within 45 calendar days of receipt of those comments. The response shall indicate whether a change will be made to the SOL Methodology and, if no change will be made to that SOL Methodology, the reason why.	<i>Balloted Language</i>	The Planning Authority received documented technical comments on its SOL Methodology and provided a complete response in a time period that was longer than 45 calendar days but less than 60 calendar days.	The Planning Authority received documented technical comments on its SOL Methodology and provided a complete response in a time period that was 60 calendar days or longer but less than 75 calendar days.	The Planning Authority received documented technical comments on its SOL Methodology and provided a complete response in a time period that was 75 calendar days or longer but less than 90 calendar days. OR The Planning Authority's response to documented technical comments on its SOL Methodology indicated that a change will not be made, but did not include an explanation of why the change will not be made.	The Planning Authority received documented technical comments on its SOL Methodology and provided a complete response in a time period that was 90 calendar days or longer. OR The Planning Authority's response to documented technical comments on its SOL Methodology did not indicate whether a change will be made to the SOL Methodology.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

FAC-010-2.1 - System Operating Limits Methodology for the Planning Horizon					
R5	<i>Proposed Change</i>	The Planning Authority received documented technical comments on its SOL Methodology and provided a complete response in a time period that was longer than 45 calendar days but less than 60 calendar days.	The Planning Authority received documented technical comments on its SOL Methodology and provided a complete response in a time period that was 60 calendar days or longer but less than 70 calendar days.	The Planning Authority received documented technical comments on its SOL Methodology and provided a complete response in a time period that was 70 calendar days or longer but less than 80 calendar days. OR The Planning Authority's response to documented technical comments on its SOL Methodology indicated that a change will not be made, but did not include an explanation of why the change will not be made.	The Planning Authority received documented technical comments on its SOL Methodology and failed to provide a complete response in 80 or more calendar days. OR The Planning Authority's response to documented technical comments on its SOL Methodology did not indicate whether a change will be made to the SOL Methodology.
Explanation: Modified to be consistent with FERC Guideline 3 and for consistency with other VSLs.					

FAC-011-2 - System Operating Limits Methodology for the Operations Horizon					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. The Reliability Coordinator shall have a documented methodology for use in developing SOLs (SOL Methodology) within its Reliability Coordinator Area. This SOL Methodology shall:	<i>Balloted Language</i>	Not applicable.	The Reliability Coordinator has a documented SOL Methodology for use in developing SOLs within its Reliability Coordinator Area, but it does not address R1.2	The Reliability Coordinator has a documented SOL Methodology for use in developing SOLs within its Reliability Coordinator Area, but it does not address R1.3.	The Reliability Coordinator has a documented SOL Methodology for use in developing SOLs within its Reliability Coordinator Area, but it does not address R1.1. OR The Reliability Coordinator has no documented SOL Methodology for use in developing SOLs within its Reliability Coordinator Area.
R1.1. Be applicable for developing SOLs used in the operations horizon.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The Reliability Coordinator's SOL methodology is not applicable for developing SOL in the operations horizon.
R1.2. State that SOLs shall not exceed associated Facility Ratings.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The Reliability Coordinator's SOL Methodology did not state that SOLs shall not exceed associated Facility Ratings
R1.3. Include a description of how to identify the subset of SOLs that qualify as IROLs	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The Reliability Coordinator's SOL Methodology did not include a description of how to identify the subset of SOLs that qualify as IROLs.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

FAC-011-2 - System Operating Limits Methodology for the Operations Horizon					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1	<i>Proposed Change</i>	Not applicable.	The Reliability Coordinator has a documented SOL Methodology for use in developing SOLs within its Reliability Coordinator Area, but it does not address R1.2	The Reliability Coordinator has a documented SOL Methodology for use in developing SOLs within its Reliability Coordinator Area, but it does not address R1.3.	The Reliability Coordinator has a documented SOL Methodology for use in developing SOLs within its Reliability Coordinator Area, but it does not address R1.1. OR The Reliability Coordinator has no documented SOL Methodology for use in developing SOLs within its Reliability Coordinator Area.
Explanation – Consistent with Guidelines filed with FERC on August 11, 2009, incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					
R2.1. In the pre-contingency state, the BES shall demonstrate transient, dynamic and voltage stability; all Facilities shall be within their Facility Ratings and within their thermal, voltage and stability limits. In the determination of SOLs, the BES condition used shall reflect current or expected system conditions and shall reflect changes to system topology such as Facility outages.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The SOL methodology does not include a requirement that SOLs provide BES performance consistent with sub-requirement R2.1.
R2.2. Following the single Contingencies ¹ identified in Requirement 2.2.1 through	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The SOL methodology does not include a requirement that SOLs

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

FAC-011-2 - System Operating Limits Methodology for the Operations Horizon					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Requirement 2.2.3, the system shall demonstrate transient, dynamic and voltage stability; all Facilities shall be operating within their Facility Ratings and within their thermal, voltage and stability limits; and Cascading or uncontrolled separation shall not occur.					provide BES performance consistent with sub-requirement R2.2.
R2.2.1. Single line to ground or 3-phase Fault (whichever is more severe), with Normal Clearing, on any Faulted generator, line, transformer, or shunt device	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not require that SOLs provide BES performance consistent with: single line to ground or 3-phase Fault (whichever is more severe), with Normal Clearing, on any Faulted generator, line, transformer, or shunt device.
R2.2.2. Loss of any generator, line, transformer, or shunt device without a Fault.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not address the loss of any generator, line, transformer, or shunt device without a Fault.
R2.2.3. Single pole block, with Normal Clearing, in a monopolar or bipolar high voltage direct current system.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not address single pole block, with Normal Clearing, in a monopolar or bipolar high voltage direct current system.
R2.3. In determining the system's response to a single Contingency, the following shall be acceptable:	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not include one or more of the following 2.3.1. through 2.3.3.
R2.3.1. Planned or controlled interruption of electric supply to	<i>Balloted</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not address that, in

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

FAC-011-2 - System Operating Limits Methodology for the Operations Horizon					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.	<i>Language</i>				determining the systems response to a single contingency, Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area is acceptable.
R2.3.2. Interruption of other network customers, (a) only if the system has already been adjusted, or is being adjusted, following at least one prior outage, or (b) if the real-time operating conditions are more adverse than anticipated in the corresponding studies	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not address that, in determining the systems response to a single contingency, Interruption of other network customers is acceptable, (a) only if the system has already been adjusted, or is being adjusted, following at least one prior outage, or (b) if the real-time operating conditions are more adverse than anticipated in the corresponding studies.
R2.3.3. System reconfiguration through manual or automatic control or protection actions.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not address that, in determining the systems response to a single contingency, system reconfiguration through manual or automatic control or protection actions is acceptable.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

FAC-011-2 - System Operating Limits Methodology for the Operations Horizon					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2.4. To prepare for the next Contingency, system adjustments may be made, including changes to generation, uses of the transmission system, and the transmission system topology.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not provide that to prepare for the next Contingency, system adjustments may be made, including changes to generation, uses of the transmission system, and the transmission system topology.
R2	<i>Proposed Change</i>	The Reliability Coordinator's SOL Methodology is missing one requirement as described in R2.1, R2.2, R2.3, or R2.4.	The Reliability Coordinator's SOL Methodology is missing two requirements as described in R2.1, R2.2, R2.3, or R2.4.	The Reliability Coordinator's SOL Methodology is missing three requirements as described in R2.1, R2.2, R2.3, or R2.4.	The Reliability Coordinator's SOL Methodology is missing four or more requirements as described in R2.1, R2.2, R2.3, or R2.4.
Explanation – Consistent with Guidelines filed with FERC on August 11, 2009, incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					
R3. The Reliability Coordinator's methodology for determining SOLs, shall include, as a minimum, a description of the following, along with any reliability margins applied for each:	<i>Balloted Language</i>	The Reliability Coordinator has a methodology for determining SOLs that includes a description for all but one of the following: R3.1 through R3.7.	The Reliability Coordinator has a methodology for determining SOLs that includes a description for all but two of the following: R3.1 through R3.7.	The Reliability Coordinator has a methodology for determining SOLs that includes a description for all but three of the following: R3.1 through R3.7.	The Reliability Coordinator has a methodology for determining SOLs that is missing a description of four or more of the following: R3.1 through R3.7.
R3.1. Study model (must include at least the entire Reliability Coordinator Area as well as the critical modeling details from other Reliability Coordinator Areas that would impact the Facility or Facilities under study.)	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not include a description of the study model to be used which must include the entire Reliability Coordinator area, and the critical details of other Reliability Coordinator areas that would impact the facility or facilities

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

FAC-011-2 - System Operating Limits Methodology for the Operations Horizon					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					under study
R3.2. Selection of applicable Contingencies	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not include the selection of applicable Contingencies.
R3.3. A process for determining which of the stability limits associated with the list of multiple contingencies (provided by the Planning Authority in accordance with FAC-014 Requirement 6) are applicable for use in the operating horizon given the actual or expected system conditions.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not include a description of a process for determining which of the stability limits associated with the list of multiple contingencies (provided by the Planning Authority in accordance with FAC-014 Requirement 6) are applicable for use in the operating horizon given the actual or expected system conditions.
R3.3.1. This process shall address the need to modify these limits, to modify the list of limits, and to modify the list of associated multiple contingencies.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology for determining SOL's does not address the need to modify the limits described in R3.3, the list of limits, or the list of associated multiple contingencies.
R3.4. Level of detail of system models used to determine SOLs.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	Methodology does not describe the level of detail of system models used to determine SOLs.
R3.5. Allowed uses of Special Protection Systems or Remedial Action Plans.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not describe the allowed uses of Special Protection Systems or

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

FAC-011-2 - System Operating Limits Methodology for the Operations Horizon					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					Remedial Action Plans.
R3.6. Anticipated transmission system configuration, generation dispatch and Load level	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not describe the anticipated transmission system configuration, generation dispatch and Load level.
R3.7. Criteria for determining when violating a SOL qualifies as an Interconnection Reliability Operating Limit (IROL) and criteria for developing any associated IROL Tv.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The methodology does not describe criteria for determining when violating a SOL qualifies as an Interconnection Reliability Operating Limit and criteria for developing any associated IROL Tv.
R3	<i>Proposed Change</i>	The Reliability Coordinator's SOL Methodology includes a description for all but one of the following: R3.1 through R3.7.	The Reliability Coordinator's SOL Methodology includes a description for all but two of the following: R3.1 through R3.7.	The Reliability Coordinator's SOL Methodology includes a description for all but three of the following: R3.1 through R3.7.	The Reliability Coordinator's SOL Methodology is missing a description of three four or more of the following: R3.1 through R3.7.
Explanation – Consistent with Guidelines filed with FERC on August 11, 2009, incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					
R4. The Reliability Coordinator shall issue its SOL Methodology and any changes to that methodology, prior to the effectiveness of the Methodology or of a change to the Methodology, to all of the following:	<i>Balloted Language</i>	One of the two following : The Reliability Coordinator issued its SOL Methodology and changes to that methodology to all but one of the required entities AND for a change in methodology, the changed methodology was provided 30 calendar days or more, but less than 60 calendar days	One of the following : The Reliability Coordinator issued its SOL Methodology and changes to that methodology to all but one of the required entities AND for a change in methodology, the changed methodology was provided 60 calendar days or more, but less	One of the following: The Reliability Coordinator failed to issue its SOL Methodology and changes to that methodology to more than three of the required entities. The Planning Authority issued its SOL Methodology and changes to that	One of the two following : The Reliability Coordinator issued its SOL Methodology and changes to that methodology to all but one of the required entities AND for a change in methodology, the changed methodology was provided 30 calendar days or more, but less than 60 calendar days

FAC-011-2 - System Operating Limits Methodology for the Operations Horizon					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		<p>after the effectiveness of the change. OR The Reliability Coordinator issued its SOL Methodology and changes to that methodology to all but two of the required entities AND for a change in methodology, the changed methodology was provided up to 30 calendar days after the effectiveness of the change.</p>	<p>than 90 calendar days after the effectiveness of the change. OR The Reliability Coordinator issued its SOL Methodology and changes to that methodology to all but two of the required entities AND for a change in methodology, the changed methodology was provided 30 calendar days or more, but less than 60 calendar days after the effectiveness of the change. OR The Reliability Coordinator issued its SOL Methodology and changes to that methodology to all but three of the required entities AND for a change in methodology, the changed methodology was provided up to 30 calendar days after the effectiveness of the change.</p>	<p>methodology to all but one of the required entities AND for a change in methodology, the changed methodology was provided 90 calendar days or more after the effectiveness of the change. OR The Reliability Coordinator issued its SOL Methodology and changes to that methodology to all but two of the required entities AND for a change in methodology, the changed methodology was provided 60 calendar days or more, but less than 90 calendar days after the effectiveness of the change. OR The Reliability Coordinator issued its SOL Methodology and changes to that methodology to all but three of the required entities AND for a change in methodology, the changed methodology was provided 30 calendar days or more, but less than 60 calendar days</p>	<p>after the effectiveness of the change. OR The Reliability Coordinator issued its SOL Methodology and changes to that methodology to all but two of the required entities AND for a change in methodology, the changed methodology was provided up to 30 calendar days after the effectiveness of the change.</p>

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

FAC-011-2 - System Operating Limits Methodology for the Operations Horizon					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
				after the effectiveness of the change. OR The Reliability Coordinator issued its SOL Methodology and changes to that methodology to all but four of the required entities AND for a change in methodology, the changed methodology was provided up to 30 calendar days after the effectiveness of the change	
R4.1. Each adjacent Reliability Coordinator and each Reliability Coordinator that indicated it has a reliability-related need for the methodology.	<i>Balloted Language</i>	Not applicable.	Not applicable.	The Reliability Coordinator did not issue its SOL Methodology or any changes to that methodology to each adjacent Reliability Coordinator and each Reliability Coordinator that indicated it has a reliability-related need for the methodology.	Not applicable.
R4.2. Each Planning Authority and Transmission Planner that models any portion of the Reliability Coordinator's Reliability Coordinator Area.	<i>Balloted Language</i>	Not applicable.	Not applicable.	The Reliability Coordinator did not issue its SOL Methodology or any changes to that methodology to each Planning Authority or Transmission Planner that models any portion	Not applicable.

FAC-011-2 - System Operating Limits Methodology for the Operations Horizon					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
				of the Reliability Coordinator's Reliability Coordinator Area.	
R4.3. Each Transmission Operator that operates in the Reliability Coordinator Area.	<i>Balloted Language</i>	Not applicable.	Not applicable.	The Reliability Coordinator did not issue its SOL Methodology or any changes to that methodology to each Transmission Operator that operates in the Reliability Coordinator Area.	Not applicable.
R4	<i>Proposed Change</i>	<p>The Reliability Coordinator failed to issue its SOL Methodology and/or one or more changes to that methodology to one of the required entities specified in R4.1, R4.2, and R4.3.</p> <p>OR</p> <p>For a change in methodology, the changed methodology was not provided to one or more of the required entities before the effectiveness of the change, but was provided to all the required entities no more than 30 calendar days after the effectiveness of the</p>	<p>The Reliability Coordinator failed to issue its SOL Methodology and/or one or more changes to that methodology to two of the required entities specified in R4.1, R4.2, and R4.3.</p> <p>OR</p> <p>For a change in methodology, the changed methodology was provided to one or more of the required entities more than 30 calendar days after the effectiveness of the change, but less than or equal to 40 days after the effectiveness of the change.</p>	<p>The Reliability Coordinator failed to issue its SOL Methodology and/or one or more changes to that methodology to three of the required entities specified in R4.1, R4.2, and R4.3.</p> <p>OR</p> <p>For a change in methodology, the changed methodology was provided to one or more of required entities more than 40 calendar days after the effectiveness of the change, but less than or equal to 50 days after the effectiveness of the change.</p>	<p>The Reliability Coordinator failed to issue its SOL Methodology and/or one or more changes to that methodology to four or more of the required entities specified in R4.1, R4.2, and R4.3.</p> <p>OR</p> <p>For a change in methodology, the changed methodology was provided to four or more of the required entities more than 50 calendar days after the effectiveness of the change.</p>

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

FAC-011-2 - System Operating Limits Methodology for the Operations Horizon					
	VSL	Lower	Moderate	High	Severe
		change.			
Explanation – Consistent with Guidelines filed with FERC on August 11, 2009, incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. The VSLs were also modified for consistency with other VSLs.					
R5. If a recipient of the SOL Methodology provides documented technical comments on the methodology, the Reliability Coordinator shall provide a documented response to that recipient within 45 calendar days of receipt of those comments. The response shall indicate whether a change will be made to the SOL Methodology and, if no change will be made to that SOL Methodology, the reason why.	<i>Balloted Language</i>	<p>The Reliability Coordinator received documented technical comments on its SOL Methodology and provided a complete response in a time period that was longer than 45 calendar days but less than 60 calendar days.</p> <p>The Reliability Coordinator received documented technical comments on its SOL Methodology and provided a complete response in a time period that was 60 calendar days or longer but less than 75 calendar days.</p> <p>"The Reliability Coordinator received documented technical comments on its SOL Methodology and provided a complete response in a time period that was 75 calendar days or longer but less than 90 calendar days.</p>	OR	<p>The Reliability Coordinator's response to documented technical comments on its SOL Methodology indicated that a change will not be made, but did not include an explanation of why the change will not be made." " The Reliability Coordinator received documented technical comments on its SOL Methodology and provided a complete response in a time period that was 90 calendar days or longer.</p>	OR
R5	<i>Proposed Change</i>	The Reliability Coordinator received documented technical comments on its SOL	The Reliability Coordinator received documented technical comments on its SOL	The Reliability Coordinator received documented technical comments on its SOL	The Reliability Coordinator received documented technical comments on its SOL

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

FAC-011-2 - System Operating Limits Methodology for the Operations Horizon					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		Methodology and provided a complete response in a time period that was longer than 45 calendar days but less than 60 calendar days.	Methodology and provided a complete response in a time period that was 60 calendar days or longer but less than 70 calendar days.	Methodology and provided a complete response in a time period that was 70 calendar days or longer but less than 80 calendar days. OR The Reliability Coordinator's response to documented technical comments on its SOL Methodology indicated that a change will not be made, but did not include an explanation of why the change will not be made.	Methodology and failed to provide a complete response in less than 80 calendar days. OR The Reliability Coordinator's response to documented technical comments on its SOL Methodology did not indicate whether a change will be made to the SOL Methodology.
Explanation – Consistent with Guidelines filed with FERC on August 11, 2009, incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. The VSLs were also modified for consistency with other VSLs.					

FAC-013-1 – Establish and Communicate Transfer Capabilities					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2. The Reliability Coordinator and Planning Authority shall each provide its inter-regional and intra-regional Transfer Capabilities to those entities that have a reliability-related need for such Transfer Capabilities and make a written request that includes a schedule for delivery of such Transfer Capabilities as follows:	<i>Balloted Language</i>	The Reliability Coordinator or Planning Authority has provided its Transfer Capabilities but missed meeting one schedule by up to 15 calendar days.	The Reliability Coordinator or Planning Authority has provided its Transfer Capabilities but missed meeting two schedules.	The Reliability Coordinator or Planning Authority has provided its Transfer Capabilities but missed meeting more than two schedules.	The Reliability Coordinator or Planning Authority has provided its Transfer Capabilities but missed meeting all schedules within 30 calendar days of the associated schedules.
R2	<i>Proposed Change</i>	The responsible entity failed to provide Transfer Capabilities to more than 5% of the required entities.	The responsible entity failed to provide Transfer Capabilities to more than 5% up to (and including) 10% of the required entities.	The responsible entity failed to provide Transfer Capabilities to more than 10% up to (and including) 15% of the required entities.	The responsible entity failed to provide Transfer Capabilities to more than 15% of the required entities.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R2.1.	<i>Balloted Language</i>	Not applicable.	The Reliability Coordinator provided its Transfer Capabilities to all but one of the required entities.	The Reliability Coordinator failed to provide its Transfer Capabilities to more than one of the required entities.	The Reliability Coordinator provided its Transfer Capabilities to none of the required entities.
R2.1	<i>Proposed Change</i>	N/A	N/A	N/A	N/A
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R2.2	<i>Balloted Language</i>	Not applicable.	The Planning Authority provided its Transfer Capabilities to all but one of the required entities.	The Planning Authority failed to provide its Transfer Capabilities to more than one of the required entities.	The Planning Authority provided its Transfer Capabilities to none of the required entities.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

FAC-013-1 – Establish and Communicate Transfer Capabilities					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2.2	<i>Proposed Change</i>	N/A	N/A	N/A	N/A
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					

FAC-014-2 - Establish and Communicate System Operating Limits					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
	<i>Balloted Language</i>	There are SOLs, for the Reliability Coordinator Area, but from 1% up to but less than 25% of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R1)	There are SOLs, for the Reliability Coordinator Area, but 25% or more, but less than 50% of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R1)	There are SOLs, for the Reliability Coordinator Area, but 50% or more, but less than 75% of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R1)	There are SOLs for the Reliability Coordinator Area, but one or more of these the SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R1)
R1	<i>Proposed Change</i>	The Reliability Coordinator ensured that there are SOLs established for the Reliability Coordinator area, but 5% or less were inconsistent with its SOL Methodology.	The Reliability Coordinator ensured that there are SOLs established for the Reliability Coordinator area, but more than 5% up to (and including) 10% were inconsistent with its SOL Methodology.	The Reliability Coordinator ensured that there are SOLs established for the Reliability Coordinator area, but more than 10% up to (and including) 15% were inconsistent with its SOL Methodology.	The Reliability Coordinator ensured that there are SOLs established for the Reliability Coordinator area, but more than 15% were inconsistent with its SOL Methodology. OR The Reliability Coordinator did not ensure that SOLs, including Interconnection Operating Limits (IROLs), were established for its Reliability Coordinator area.
Explanation – Modified to be consistent with FERC Guideline 3. Modified for clarity and consistency with other standards and VSLs.					

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

FAC-014-2 - Establish and Communicate System Operating Limits					
R2. The Transmission Operator shall establish SOLs (as directed by its Reliability Coordinator) for its portion of the Reliability Coordinator Area that are consistent with its Reliability Coordinator's SOL Methodology.	<i>Balloted Language</i>	The Transmission Operator has established SOLs for its portion of the Reliability Coordinator Area, but from 1% up to but less than 25% of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R2)	The Transmission Operator has established SOLs for its portion of the Reliability Coordinator Area, but 25% or more, but less than 50% of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R2)	The Transmission Operator has established SOLs for its portion of the Reliability Coordinator Area, but 50% or more, but less than 75% of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R2)	The Transmission Operator has established SOLs for its portion of the Reliability Coordinator Area, but 75% or more of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R2)
R2	<i>Proposed Change</i>	The Transmission Operator established SOLs (as directed by its Reliability Coordinator) for its portion of the Reliability Coordinator area, but 5% or less were inconsistent with its Reliability Coordinator's SOL Methodology.	The Transmission Operator established SOLs (as directed by its Reliability Coordinator) for its portion of the Reliability Coordinator area, but more than 5% up to (and including) 10% were inconsistent with its Reliability Coordinator's SOL Methodology.	The Transmission Operator established SOLs (as directed by its Reliability Coordinator) for its portion of the Reliability Coordinator area, but more than 10% up to (and including) 15% were inconsistent with its Reliability Coordinator's SOL Methodology.	The Transmission Operator established SOLs (as directed by its Reliability Coordinator) for its portion of the Reliability Coordinator area, but more than 15% were inconsistent with its Reliability Coordinator's SOL Methodology. OR The Transmission Operator did not establish SOLs for its portion of the Reliability Coordinator area.
Explanation – Modified to be consistent with FERC Guideline 3. Modified for clarity and consistency with other standards and VSLs.					
R3. The Planning Authority shall establish SOLs, including IROLs, for its Planning Authority Area that are consistent with its SOL Methodology.	<i>Balloted Language</i>	There are SOLs, for the Planning Coordinator Area, but from 1% up to, but less than, 25% of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R3)	There are SOLs, for the Planning Coordinator Area, but 25% or more, but less than 50% of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R3)	There are SOLs for the Planning Coordinator Area, but 10% or more, but less than 75% of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R3)	There are SOLs, for the Planning Coordinator Area, but 75% or more of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R3)

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

FAC-014-2 - Establish and Communicate System Operating Limits					
R3	<i>Proposed Change</i>	The Planning Authority established SOLs for the Planning Authority Area, but 5% or less were inconsistent with its SOL Methodology.	The Planning Authority established SOLs for the Planning Authority Area, but more than 5% up to (and including) 10% were inconsistent with its SOL Methodology.	The Planning Authority established SOLs for the Planning Authority Area, but more than 10% up to (and including) 15% were inconsistent with its SOL Methodology.	The Planning Authority established SOLs for the Planning Authority Area, but more than 15% were inconsistent with its SOL Methodology. OR The Planning Authority did not ensure that SOLs, including Interconnection Operating Limits (IROLs), were established for its Planning Authority Area.
Explanation – Modified to be consistent with FERC Guideline 3. Modified for clarity and consistency with other standards and VSLs.					
R4. The Transmission Planner shall establish SOLs, including IROLs, for its Transmission Planning Area that are consistent with its Planning Authority's SOL Methodology.	<i>Balloted Language</i>	The Transmission Planner has established SOLs for its portion of the Planning Coordinator Area, but up to 25% of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R4)	The Transmission Planner has established SOLs for its portion of the Planning Coordinator Area, but 25% or more, but less than 50% of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R4)	The Transmission Planner has established SOLs for its portion of the Reliability Coordinator Area, but 50% or more, but less than 75% of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R4)	The Transmission Planner has established SOLs for its portion of the Planning Coordinator Area, but one or more of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R4)
R4	<i>Proposed Change</i>	The Transmission Planner established SOLs for the Transmission Planning Area, but 5% or less were inconsistent with its Planning Authority's SOL Methodology.	The Transmission Planner established SOLs for the Transmission Planning Area, but more than 5% up to (and including) 10% were inconsistent with its Planning Authority's SOL Methodology.	The Transmission Planner established SOLs for the Transmission Planning Area, but more than 10% up to (and including) 15% were inconsistent with its Planning Authority's SOL Methodology.	The Transmission Planner established SOLs for the Transmission Planning Area, but more than 15% were inconsistent with its Planning Authority's SOL Methodology. OR

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FAC-014-2 - Establish and Communicate System Operating Limits					
					The Transmission Planner did not ensure that SOLs, including Interconnection Operating Limits (IROLs), were established for its Transmission Planning Area.
Explanation – Modified to be consistent with FERC Guideline 3. Modified for clarity and consistency with other standards and VSLs.					
R5. The Reliability Coordinator, Planning Authority and Transmission Planner shall each provide its SOLs and IROLs to those entities that have a reliability-related need for those limits and provide a written request that includes a schedule for delivery of those limits as follows	<i>Balloted Language</i>	The responsible entity provided its SOLs to all the requesting entities but missed meeting one or more of the schedules by less than 15 calendar days. (R5)	One of the following: The responsible entity provided its SOLs to all but one of the requesting entities within the schedules provided. (R5) Or The responsible entity provided its SOLs to all the requesting entities but missed meeting one or more of the schedules for 15 or more but less than 30 calendar days. (R5) OR The supporting information provided with the IROLs does not address 5.1.4	One of the following: The responsible entity provided its SOLs to all but two of the requesting entities within the schedules provided. (R5) Or The responsible entity provided its SOLs to all the requesting entities but missed meeting one or more of the schedules for 30 or more but less than 45 calendar days. (R5) OR The supporting information provided with the IROLs does not address 5.1.3	One of the following: The responsible entity failed to provide its SOLs to more than two of the requesting entities within 45 calendar days of the associated schedules. (R5) OR The supporting information provided with the IROLs does not address 5.1.1 and 5.1.2.
R5.1. The Reliability Coordinator shall provide its SOLs (including the subset of SOLs that are IROLs) to adjacent Reliability Coordinators and Reliability Coordinators who indicate a	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The Reliability Coordinator did not provide its SOLs (including the subset of SOLs that are IROLs) to adjacent Reliability Coordinators and

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reliability-related need for those limits, and to the Transmission Operators, Transmission Planners, Transmission Service Providers and Planning Authorities within its Reliability Coordinator Area. For each IROL, the Reliability Coordinator shall provide the following supporting information					Reliability Coordinators who indicate a reliability-related need for those limits, and to the Transmission Operators, Transmission Planners, Transmission Service Providers and Planning Authorities within its Reliability Coordinator Area.
R5.1.1. Identification and status of the associated Facility (or group of Facilities) that is (are) critical to the derivation of the IROL	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	For any IROL, the Reliability Coordinator did not provide the Identification and status of the associated Facility (or group of Facilities) that is (are) critical to the derivation of the IROL.
R5.1.2. The value of the IROL and its associated Tv.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	For any IROL, the Reliability Coordinator did not provide the value of the IROL and its associated Tv.
R5.1.3. The associated Contingency(ies).	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	For any IROL, the Reliability Coordinator did not provide the associated Contingency(ies).
R5.1.4. The type of limitation represented by the IROL (e.g., voltage collapse, angular stability).	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	For any IROL, the Reliability Coordinator did not provide the type of limitation represented by the IROL (e.g., voltage collapse, angular stability).
R5.2. The Transmission Operator shall provide any	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The Transmission Operator did not provide

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SOLs it developed to its Reliability Coordinator and to the Transmission Service Providers that share its portion of the Reliability Coordinator Area.					the complete set of SOLs it developed to its Reliability Coordinator and to the Transmission Service Providers that share its portion of the Reliability Coordinator Area.
R5.3. The Planning Authority shall provide its SOLs (including the subset of SOLs that are IROLs) to adjacent Planning Authorities, and to Transmission Planners, Transmission Service Providers, Transmission Operators and Reliability Coordinators that work within its Planning Authority Area.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The Planning Authority did not provide its complete set of SOLs (including the subset of SOLs that are IROLs) to adjacent Planning Authorities, and to Transmission Planners, Transmission Service Providers, Transmission Operators and Reliability Coordinators that work within its Planning Authority Area.
R5.4. The Transmission Planner shall provide its SOLs (including the subset of SOLs that are IROLs) to its Planning Authority, Reliability Coordinators, Transmission Operators, and Transmission Service Providers that work within its Transmission Planning Area and to adjacent Transmission Planners.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The Transmission Planner did not provide its complete set of SOLs (including the subset of SOLs that are IROLs) to its Planning Authority, Reliability Coordinators, Transmission Operators, and Transmission Service Providers that work within its Transmission Planning Area and to adjacent Transmission Planners.
R5	<i>Proposed Change</i>	The responsible entity provided its SOLs to all entities that have a reliability related need	The responsible entity provided its SOLs to all the required entities that	The responsible entity provided its SOLs to all the required entities that	The responsible entity failed to provide its SOLs to all the required entities

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		and any that provided a written request but missed meeting one or more of the schedules by less than 15 calendar days. (R5.1 through R5.4)	have a reliability related need and any that provided a written request but missed meeting one or more of the schedules for 15 or more but less than 25 calendar days. (R5.1 through R5.4)	have a reliability related need and any that provided a written request but missed meeting one or more of the schedules for 25 or more but less than 35 calendar days. (R5.1 through R5.4)	have a reliability related need and any that provided a written request within 35 calendar days of the associated schedules. (R5.1 through R5.4)
			OR	OR	OR
			The supporting information provided with the IROLs does not address 5.1.4	The supporting information provided with the IROLs does not address 5.1.3	The supporting information provided with the IROLs does not address 5.1.1 and 5.1.2.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					
R6. The Planning Authority shall identify the subset of multiple contingencies (if any), from Reliability Standard TPL-003 which result in stability limits.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The Planning Authority did not identify the subset of multiple contingencies which result in stability limits.
R6.1. The Planning Authority shall provide this list of multiple contingencies and the associated stability limits to the Reliability Coordinators that monitor the facilities associated with these contingencies and limits.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The Planning Authority did not identify the subset of multiple contingencies, from TPL-003 that resulted in stability limits and provide the complete list of multiple contingencies and the associated stability limits to the Reliability Coordinators that monitor the facilities associated with these contingencies and limits.

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FAC-014-2 - Establish and Communicate System Operating Limits					
R6.2. If the Planning Authority does not identify any stability-related multiple contingencies, the Planning Authority shall so notify the Reliability Coordinator.	<i>Balloted Language</i>	Not applicable.	Not applicable.	Not applicable.	The Planning Authority did not notify the Reliability Coordinator that it did not identify any stability-related multiple contingencies,
R6	<i>Proposed Change</i>	The Planning Authority determined that it did not have any stability related multiple contingencies, but did not notify the Reliability Coordinator of that determination. (R6.2)	N/A	N/A	<p>The Planning Authority did not identify the subset of multiple contingencies, from TPL-003 that resulted in stability limits.</p> <p>OR</p> <p>The Planning Authority determined that it had one or more stability related multiple contingencies, but did not provide the complete list of multiple contingencies and the associated stability limits to the Reliability Coordinators that monitor the facilities associated with these contingencies and limits. (R6.1)</p>
Explanation – Modified for clarity and consistency with other standards and VSLs. Consistent with Guidelines filed with FERC on August 11, 2009, incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					

MOD-010-0 - Steady-State Data for Modeling and Simulation of the Interconnected Transmission System					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners (specified in the data requirements and reporting procedures of MOD-011-0_R1) shall provide appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-011-0_R 1.	<i>Balloted Language</i>	The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide less than or equal to 25% of the appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-011-0_R 1	The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide greater than 25% but less than or equal to 50% of the appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-011-0_R1.	The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide greater than 50% but less than or equal to 75% of the appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-011-0_R1.	The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide greater than 75% of the appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-011-0_R1.
R1	<i>Proposed Change</i>	The responsible entity failed to provide 5% or less of the appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and	The responsible entity failed to provide more than 5% up to (and including) 10% of the appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data	The responsible entity failed to provide more than 10% up to (and including) 15% of the appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data	The responsible entity failed to provide more than 15% of the appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and

MOD-010-0 - Steady-State Data for Modeling and Simulation of the Interconnected Transmission System					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		reporting procedures, as defined in Reliability Standard MOD-011-0_R 1	requirements and reporting procedures, as defined in Reliability Standard MOD-011-0_R1.	requirements and reporting procedures, as defined in Reliability Standard MOD-011-0_R1.	simulation data requirements and reporting procedures, as defined in Reliability Standard MOD-011-0_R1.
Explanation – The VSLs were modified for clarity and to use higher performance percentages for consistency with other standards and VSLs.					
R2. The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners (specified in the data requirements and reporting procedures of MOD-011-0_R1) shall provide this steady-state modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-011-0_R 1. If no schedule exists, then these entities shall provide the data on request (30 calendar days).	<i>Balloted Language</i>	<p>The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide less than or equal to 25% of the steady-state modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-011-0_R 1.</p> <p>OR</p> <p>If no schedule exists, The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners provided data more than 30 but less than or equal to 35 calendar days following the request.</p>	<p>The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide greater than 25% but less than or equal to 50% of the steady-state modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-011-0_R 1.</p> <p>OR</p> <p>If no schedule exists, The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners provided data more than 35 but less than or equal to 40 calendar days following the request.</p>	<p>The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide greater than 50% but less than or equal to 75% of the steady-state modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-011-0_R 1.</p> <p>OR</p> <p>If no schedule exists, The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners provided data more than 40 but less than or equal to 45 calendar days following the request.</p>	<p>The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide greater than 75% of the steady-state modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-011-0_R 1.</p> <p>OR</p> <p>If no schedule exists, The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide data more than 45 calendar days following the request.</p>

MOD-010-0 - Steady-State Data for Modeling and Simulation of the Interconnected Transmission System

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2	<i>Proposed Change</i>	<p>The Responsible Entity failed to provide 5% or less of the steady-state modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-011-0_R 1.</p> <p>OR</p> <p>No schedule existed, and the Responsible Entity provided data more than 30 but less than or equal to 40 calendar days following the request.</p>	<p>The Responsible Entity failed to provide more than 5% but less than or equal to 10% of the steady-state modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-011-0_R 1.</p> <p>OR</p> <p>No schedule existed, and the Responsible Entity provided data more than 40 but less than or equal to 50 calendar days following the request.</p>	<p>The Responsible Entity failed to provide more than 10% but less than or equal to 15% of the steady-state modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-011-0_R 1.</p> <p>OR</p> <p>No schedule existed, and the Responsible Entity provided data more than 50 but less than or equal to 60 calendar days following the request.</p>	<p>The Responsible Entity failed to provide more than 15% of the steady-state modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-011-0_R 1.</p> <p>OR</p> <p>No schedule existed, and the Responsible Entity failed to provide data more than 60 calendar days following the request.</p>

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

MOD-012-0 - Dynamics Data for Modeling and Simulation of the Interconnected Transmission System					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners (specified in the data requirements and reporting procedures of MOD-013-0_R1) shall provide appropriate equipment characteristics and system data in compliance with the respective Interconnection-wide Regional dynamics system modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-013-0_R1.	<i>Balloted Language</i>	The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide less than or equal to 25% of the appropriate equipment characteristics and system data in compliance with the respective Interconnection-wide Regional dynamics system modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-013-0_R1	The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide greater than 25% but less than 50% of the appropriate equipment characteristics and system data in compliance with the respective Interconnection-wide Regional dynamics system modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-013-0_R1.	The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide greater than 50% but less than 75% of the appropriate equipment characteristics and system data in compliance with the respective Interconnection-wide Regional dynamics system modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-013-0_R1.	The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide greater than 75% of the appropriate equipment characteristics and system data in compliance with the respective Interconnection-wide Regional dynamics system modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-013-0_R1.
R1	<i>Proposed Change</i>	The responsible entity failed to provide 5% or less of the appropriate equipment characteristics and system data in compliance with the respective Interconnection-wide Regional dynamics system modeling and simulation data requirements and reporting procedures; as defined in Reliability	The responsible entity failed to provide more than 5% up to (and including) 10% of the appropriate equipment characteristics and system data in compliance with the respective Interconnection-wide Regional dynamics system modeling and simulation data requirements and	The responsible entity failed to provide more than 10% up to (and including) 15% of the appropriate equipment characteristics and system data in compliance with the respective Interconnection-wide Regional dynamics system modeling and simulation data requirements and	The responsible entity failed to provide more than 15% of the appropriate equipment characteristics and system data in compliance with the respective Interconnection-wide Regional dynamics system modeling and simulation data requirements and reporting procedures as

MOD-012-0 - Dynamics Data for Modeling and Simulation of the Interconnected Transmission System					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		Standard MOD-013-0_R1	reporting procedures as defined in Reliability Standard MOD-013-0_R1.	reporting procedures as defined in Reliability Standard MOD-013-0_R1.	defined in Reliability Standard MOD-013-0_R1.
Explanation – The VSLs were modified for clarity.					
	VSL	Lower	Moderate	High	Severe
R2. The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners (specified in the data requirements and reporting procedures of MOD-013-0_R4) shall provide dynamics system modeling and simulation data to its Regional Reliability Organization(s), NERC, and those entities specified within the applicable reporting procedures identified in Reliability Standard MOD-013-0_R 1. If no schedule exists, then these entities shall provide data on request (30 calendar days).	<i>Balloted Language</i>	<p>The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide less than or equal to 25% of the dynamics system modeling and simulation data to its Regional Reliability Organization(s), NERC, and those entities specified within the applicable reporting procedures identified in Reliability Standard MOD-013-0_R 1</p> <p>OR</p> <p>If no schedule exists, The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners provided data more than 30 but less than or equal to 35 calendar days following the request.</p>	<p>The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide greater than 25% but less than 50% of the dynamics system modeling and simulation data to its Regional Reliability Organization(s), NERC, and those entities specified within the applicable reporting procedures identified in Reliability Standard MOD-013-0_R 1.</p> <p>OR</p> <p>If no schedule exists, The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners provided data more than 35 but less than or equal to 40 calendar days following</p>	<p>The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide greater than 50% but less than 75% of the dynamics system modeling and simulation data to its Regional Reliability Organization(s), NERC, and those entities specified within the applicable reporting procedures identified in Reliability Standard MOD-013-0_R 1.</p> <p>OR</p> <p>If no schedule exists, The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners provided data more than 40 but less than or equal to 45 calendar days following the request.</p>	<p>The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide greater than 75% of the dynamics system modeling and simulation data to its Regional Reliability Organization(s), NERC, and those entities specified within the applicable reporting procedures identified in Reliability Standard MOD-013-0_R 1.</p> <p>OR</p> <p>If no schedule exists, The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners failed to provide data more than 45 calendar days following the request.</p>

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MOD-012-0 - Dynamics Data for Modeling and Simulation of the Interconnected Transmission System					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
			the request.		
R2	<i>Proposed Change</i>	<p>The Responsible Entity failed to provide 5% or less of the dynamic system modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-013-0_R 1.</p> <p>OR</p> <p>No schedule existed, and the Responsible Entity provided data more than 30 but less than or equal to 40 calendar days following the request.</p>	<p>The Responsible Entity failed to provide more than 5% but less than or equal to 10% of the dynamic system modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-013-0_R 1.</p> <p>OR</p> <p>No schedule existed, and the Responsible Entity provided data more than 40 but less than or equal to 50 calendar days following the request.</p>	<p>The Responsible Entity failed to provide more than 10% but less than or equal to 15% of the dynamic system modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-013-0_R 1.</p> <p>OR</p> <p>No schedule existed, and the Responsible Entity provided data more than 50 but less than or equal to 60 calendar days following the request.</p>	<p>The Responsible Entity failed to provide more than 15% of the dynamic system modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-013-0_R 1.</p> <p>OR</p> <p>No schedule existed, and the Responsible Entity failed to provide data more than 60 calendar days following the request.</p>
Explanation – The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs.					

MOD-016-1.1 Documentation of Data Reporting Requirements for Actual and Forecast Demands, Net Energy for Load, and Controllable Demand-Side Management					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2. The Regional Reliability Organization shall distribute its documentation required in Requirement 1 and any changes to that documentation, to all Planning Authorities that work within its Region.	<i>Balloted Language</i>	N/A	N/A	The Regional Reliability Organization distributed its documentation as specified in R1 but failed to distribute any changes to that documentation, to all Planning Authorities that work within its Region.	The Regional Reliability Organization failed to distribute its documentation as specified in R1 to all Planning Authorities that work within its Region.
R2.1 The Regional Reliability Organization shall make this distribution within 30 calendar days of approval.	<i>Balloted Language</i>	The Regional Reliability Organization distributed the documentation more than 30 but less than or equal to 37 calendar days following approval.	The Regional Reliability Organization made the distribution more than 37 but less than or equal to 51 calendar days following approval.	The Regional Reliability Organization made the distribution more than 51 but less than or equal to 58 calendar days following approval.	The Regional Reliability Organization failed to make the distribution more than 58 calendar days following approval.
R2	<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.					

MOD-018-0 - Treatment of Nonmember Demand Data and How Uncertainties are Addressed in the Forecasts of Demand and Net Energy for Load					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2. The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner shall each report data associated with Reliability Standard MOD-018-0_R1 to NERC, the Regional Reliability Organization, Load-Serving Entity, Planning Authority, and Resource Planner on request (within 30 calendar days).	<i>Balloted Language</i>	The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner reported the data associated with Reliability Standard MOD-018-0_R1 to NERC, the Regional Reliability Organization, Load-Serving Entity, Planning Authority, and Resource Planner more than 30 but less than or equal to 45 calendar days following the request.	The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner reported the data associated with Reliability Standard MOD-018-0_R1 to NERC, the Regional Reliability Organization, Load-Serving Entity, Planning Authority, and Resource Planner more than 45 but less than or equal to 60 calendar days following the request.	The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner reported the data associated with Reliability Standard MOD-018-0_R1 to NERC, the Regional Reliability Organization, Load-Serving Entity, Planning Authority, and Resource Planner more than 60 but less than or equal to 75 calendar days following the request.	The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner failed to report the data associated with Reliability Standard MOD-018-0_R1 to NERC, the Regional Reliability Organization, Load-Serving Entity, Planning Authority, and Resource Planner more than 75 calendar days following the request.
R2	<i>Proposed Change</i>	The responsible entity reported the data associated with R1 to NERC, the Regional Reliability Organization, Load-Serving Entity, Planning Authority, and Resource Planner more than 30 calendar days but less than or equal to 40 calendar days following the request.	The responsible entity reported the data associated with R1 to NERC, the Regional Reliability Organization, Load-Serving Entity, Planning Authority, and Resource Planner more than 40 calendar days but less than or equal to 50 calendar days following the request.	The responsible entity reported the data associated with R1 to NERC, the Regional Reliability Organization, Load-Serving Entity, Planning Authority, and Resource Planner more than 50 calendar days but less than or equal to 60 calendar days following the request.	The responsible entity reported the data associated with R1 to NERC, the Regional Reliability Organization, Load-Serving Entity, Planning Authority, and Resource Planner more than 60 calendar days following the request. OR The responsible entity failed to report the data associated with R1 to one or more of the following: NERC, the Regional Reliability Organization, Load-Serving Entity, Planning

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

MOD-018-0 - Treatment of Nonmember Demand Data and How Uncertainties are Addressed in the Forecasts of Demand and Net Energy for Load					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					Authority, or Resource Planner.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs.					

MOD-019-0.1 - Reporting of Interruptible Demands and Direct Control Load Management					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner shall each provide annually its forecasts of interruptible demands and Direct Control Load Management (DCLM) data for at least five years and up to ten years into the future, as requested, for summer and winter peak system conditions to NERC, the Regional Reliability Organizations, and other entities (Load-Serving Entities, Planning Authorities, and Resource Planners) as specified by the documentation in Reliability Standard MOD-016-0_R 1.	<i>Balloted Language</i>	The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner failed to provide annually less than or equal to 25% of the interruptible demands and Direct Control Load Management (DCLM) data for at least five years and up to ten years into the future, as requested, for summer and winter peak system conditions to NERC, the Regional Reliability Organizations, and other entities (Load-Serving Entities, Planning Authorities, and Resource Planners) as specified by the documentation in Reliability Standard MOD-016-0_R 1.	The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner failed to provide annually greater than 25% but less than or equal to 50% of the interruptible demands and Direct Control Load Management (DCLM) data for at least five years and up to ten years into the future, as requested, for summer and winter peak system conditions to NERC, the Regional Reliability Organizations, and other entities (Load-Serving Entities, Planning Authorities, and Resource Planners) as specified by the documentation in Reliability Standard MOD-016-0_R1.	The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner failed to provide annually greater than 50% but less than or equal to 75% of the interruptible demands and Direct Control Load Management (DCLM) data for at least five years and up to ten years into the future, as requested, for summer and winter peak system conditions to NERC, the Regional Reliability Organizations, and other entities (Load-Serving Entities, Planning Authorities, and Resource Planners) as specified by the documentation in Reliability Standard MOD-016-0_R1.	The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner failed to provide annually greater than 75% of the interruptible demands and Direct Control Load Management (DCLM) data for at least five years and up to ten years into the future, as requested, for summer and winter peak system conditions to NERC, the Regional Reliability Organizations, and other entities (Load-Serving Entities, Planning Authorities, and Resource Planners) as specified by the documentation in Reliability Standard MOD-016-0_R1.
R1. The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner shall each provide annually its forecasts of interruptible demands and Direct Control Load Management (DCLM) data for at least five years and up to ten years into the future, as	<i>Proposed Change</i>	N/A	The responsible entity failed to provide annually its forecast for interruptible demands and Direct Control Load Management (DCLM) data for at least five years and up to ten years into the future, as requested, for summer	N/A	The responsible entity failed to provide annually its forecast for interruptible demands and Direct Control Load Management (DCLM) data for at least five years and up to ten years into the future, as requested, for summer

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

MOD-019-0.1 - Reporting of Interruptible Demands and Direct Control Load Management					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
requested, for summer and winter peak system conditions to NERC, the Regional Reliability Organizations, and other entities (Load-Serving Entities, Planning Authorities, and Resource Planners) as specified by the documentation in Reliability Standard MOD-016-0_R 1.			<p>peak system conditions to NERC, the Regional Reliability Organizations, and other entities (Load-Serving Entities, Planning Authorities, and Resource Planners) as specified by the documentation in Reliability Standard MOD-016-0_R1.</p> <p>OR</p> <p>The responsible entity failed to provide annually its forecast for interruptible demands and Direct Control Load Management (DCLM) data for at least five years and up to ten years into the future, as requested, for winter peak system conditions to NERC, the Regional Reliability Organizations, and other entities (Load-Serving Entities, Planning Authorities, and Resource Planners) as specified by the documentation in Reliability Standard MOD-016-0_R1.</p>		and winter peak system conditions to NERC, the Regional Reliability Organizations, and other entities (Load-Serving Entities, Planning Authorities, and Resource Planners) as specified by the documentation in Reliability Standard MOD-016-0_R1.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					

MOD-020-0 - Providing Interruptible Demands and Direct Control Load Management Data to System Operators and Reliability Coordinators					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. The Load-Serving Entity, Transmission Planner, and Resource Planner shall each make known its amount of interruptible demands and Direct Control Load Management (DCLM) to Transmission Operators, Balancing Authorities, and Reliability Coordinators on request within 30 calendar days.	<i>Balloted Language</i>	The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner made known its amount of interruptible demands and Direct Control Load Management (DCLM) more than 30 but less than 45 calendar days following the request from Transmission Operators, Balancing Authorities, and Reliability Coordinators.	The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner made known its amount of interruptible demands and Direct Control Load Management (DCLM) more than 45 but less than 60 calendar days following the request from Transmission Operators, Balancing Authorities, and Reliability Coordinators.	The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner made known its amount of interruptible demands and Direct Control Load Management (DCLM) more than 60 but less than 75 calendar days following the request from Transmission Operators, Balancing Authorities, and Reliability Coordinators.	The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner failed to make known its amount of interruptible demands and Direct Control Load Management (DCLM) more than 75 calendar days following the request from Transmission Operators, Balancing Authorities, and Reliability Coordinators.
R1	<i>Proposed Change</i>	The responsible entity made known its amount of interruptible demands and Direct Control Load Management (DCLM) more than 30 calendar days but less than or equal to 40 calendar days following the request from Transmission Operators, Balancing Authorities, and Reliability Coordinators.	The responsible entity made known its amount of interruptible demands and Direct Control Load Management (DCLM) more than 40 calendar days but less than or equal to 50 calendar days following the request from Transmission Operators, Balancing Authorities, and Reliability Coordinators.	The responsible entity made known its amount of interruptible demands and Direct Control Load Management (DCLM) more than 50 calendar days but less than or equal to 60 calendar days following the request from Transmission Operators, Balancing Authorities, and Reliability Coordinators.	The responsible entity made known its amount of interruptible demands and Direct Control Load Management (DCLM) more than 60 calendar days following the request from Transmission Operators, Balancing Authorities, and Reliability Coordinators. OR The responsible entity failed to make known its amount of interruptible demands and Direct Control Load Management to one or more of the following

Staff Proposed Changes to Previously Balloted Violation Severity Levels (FAC, MOD)

MOD-020-0 - Providing Interruptible Demands and Direct Control Load Management Data to System Operators and Reliability Coordinators					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					entities following their request: Transmission Operator, Balancing Authority, and Reliability Coordinator.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity.					

MOD-021-0.1 - Documentation of the Accounting Methodology for the Effects of Controllable Demand-Side Management in Demand and Energy Forecasts					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R3. The Load-Serving Entity, Transmission Planner, and Resource Planner shall each make documentation on the treatment of its DSM programs available to NERC on request (within 30 calendar days).	<i>Balloted Language</i>	The Load-Serving Entity, Transmission Planner, and Resource Planner provided documentation on the treatment of its DSM programs more than 30 but less than 45 calendar days following the request from NERC.	The Load-Serving Entity, Transmission Planner, and Resource Planner provided documentation on the treatment of its DSM programs more than 45 but less than 60 calendar days following the request from NERC.	The Load-Serving Entity, Transmission Planner, and Resource Planner provided documentation on the treatment of its DSM programs more than 60 but less than 75 calendar days following the request from NERC.	The Load-Serving Entity, Transmission Planner, and Resource Planner failed to provide documentation on the treatment of its DSM programs more than 75 calendar days following the request from NERC.
R3.	<i>Proposed Change</i>	The responsible entity provided documentation on the treatment of its DSM programs more than 30 calendar days but less than or equal to 40 calendar days following the request from NERC.	The responsible entity provided documentation on the treatment of its DSM programs more than 40 calendar days but less than or equal to 50 calendar days following the request from NERC.	The responsible entity provided documentation on the treatment of its DSM programs more than 50 calendar days but less than or equal to 60 calendar days following the request from NERC.	The responsible entity provided documentation on the treatment of its DSM programs more than 60 calendar days following the request from NERC. OR The responsible entity failed to provide documentation on the treatment of its DSM programs following a request from NERC.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs.					