

Staff Proposed Changes to Previously Balloted Violation Severity Levels (Nuclear, Transmission Operations, and Voltage and Reactive)

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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NUC-001-2 – Nuclear Plant Interface Coordination					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R4. Per the Agreements developed in accordance with this standard, the applicable Transmission Entities shall:	<i>Balloted Language</i>	The applicable Transmission Entity failed to incorporate one or more applicable NPIRs into their operating analyses.	The applicable Transmission Entity failed to incorporate any NPIRs into their operating analyses OR did not inform NPG operator when their ability of assess the operation of the electric system affecting the NPIRs was lost.	The applicable Transmission Entity failed to operate the system to meet the NPIRs	N/A
R4	<i>Proposed Change</i>	N/A	The responsible entity did not comply with sub-requirement R4.3 but is compliant with subrequirements R4.1 and R4.2.	The responsible entity did not comply with R4.1 but is compliant with R4.2.	The responsible entity did not comply with R4.2.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					
R6. Per the Agreements developed in accordance with this standard, the applicable Transmission Entities and the Nuclear Plant Generator Operator shall coordinate outages and maintenance activities which affect the NPIRs.	<i>Balloted Language</i>	The Nuclear Operator or Transmission Entity failed to coordinate outages or maintenance activities in accordance with one or more of the administrative elements within the agreements.	The Nuclear Operator or Transmission Entity failed to provide outage or maintenance schedules to the appropriate parties as described in the agreement or on a time period consistent with the agreements.	The Nuclear Operator or Transmission Entity failed to coordinate one or more outages or maintenance activities in accordance the requirements of the agreements.	N/A
R6	<i>Proposed Change</i>	N/A	N/A	N/A	The responsible entity had an outage or maintenance activity which affected an NPIR and failed to coordinate per the Agreements developed in

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NUC-001-2 – Nuclear Plant Interface Coordination					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					accordance with this standard.
Explanation – The VSLs were modified to be consistent with FERC Guidelines 2 and 3.					
R7. Per the Agreements developed in accordance with this standard, the Nuclear Plant Generator Operator shall inform the applicable Transmission Entities of actual or proposed changes to nuclear plant design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs.	<i>Balloted Language</i>	The Nuclear Plant Generator Operator did not inform the applicable Transmission Entities of proposed changes to nuclear plant design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs.	The Nuclear Plant Generator Operator did not inform the applicable Transmission Entities of actual changes to nuclear plant design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs.	The Nuclear Plant Generator Operator did not inform the applicable Transmission Entities of actual changes to nuclear plant design, configuration, operations, limits, protection systems, or capabilities that directly impact the ability of the electric system to meet the NPIRs.	N/A
R7	<i>Proposed Change</i>	N/A	The Nuclear Plant Generator Operator did not inform the applicable Transmission Entities per the Agreements developed in accordance with this standard of a proposed change to nuclear plant design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs.	N/A	The Nuclear Plant Generator Operator did not inform the applicable Transmission Entities per the Agreements developed in accordance with this standard of an actual change to nuclear plant design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					
R8. Per the Agreements developed in accordance with this standard, the applicable	<i>Balloted Language</i>	The applicable Transmission Entities did not inform the Nuclear	The applicable Transmission Entities did not inform the	The applicable Transmission Entities did not inform the Nuclear	N/A

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NUC-001-2 – Nuclear Plant Interface Coordination					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		Plant Generator Operator of proposed changes to transmission system design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs.	Nuclear Plant Generator Operator of actual changes to transmission system design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs.	Plant Generator Operator of actual changes to transmission system design, configuration, operations, limits, protection systems, or capabilities that directly impacts the ability of the electric system to meet the NPIRs.	
R8	<i>Proposed Change</i>	N/A	The applicable Transmission Entity did not inform the Nuclear Plant Generator Operator per the Agreements developed in accordance with this standard of a proposed change to transmission system design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs.	N/A	The applicable Transmission Entity did not inform the Nuclear Plant Generator Operator per the Agreements developed in accordance with this standard of an actual change to transmission system design, configuration, operations, limits, protection systems, or capabilities that may impact the ability of the electric system to meet the NPIRs.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					

TOP-001-1 – Reliability Responsibilities and Authorities					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Each Transmission Operator shall have the responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its area and shall exercise specific authority to alleviate operating emergencies.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission Operator has no evidence that clear decision-making authority exists to assure reliability in its area or has failed to exercise this authority to alleviate operating emergencies.
R1	<i>Proposed Change</i>	N/A	N/A	The Transmission Operator has no clear decision-making authority to ensure reliability in its area.	The Transmission Operator failed to exercise specific authority to alleviate operating emergencies.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					

TOP-002-2a – Normal Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R3. Each Load-Serving Entity and Generator Operator shall coordinate (where confidentiality agreements allow) its current-day, next-day, and seasonal operations with its Host Balancing Authority and Transmission Service Provider. Each Balancing Authority and Transmission Service Provider shall coordinate its current-day, next-day, and seasonal operations with its Transmission Operator.	<i>Balloted Language</i>	N/A	The Load-Serving Entity or Generator Operator failed to coordinate (where confidentiality agreements allow) its seasonal operations with its Host Balancing Authority and Transmission Service Provider, or the Balancing Authority or Transmission Service Provider failed to coordinate its seasonal operations with its Transmission Operator.	N/A	The Load-Serving Entity or Generator Operator failed to coordinate (where confidentiality agreements allow) its current-day, next-day, and seasonal operations with its Host Balancing Authority and Transmission Service Provider, or the Balancing Authority or Transmission Service Provider failed to coordinate its current-day, next-day, and seasonal operations with its Transmission Operator.
R3	<i>Proposed Change</i>	N/A	The responsible entity failed to coordinate (where confidentiality agreements allow) one of the following three categories of operations (current-day, next-day or seasonal) with the applicable entity(ies)	The responsible entity failed to coordinate (where confidentiality agreements allow) two of the following three categories of operations (current-day, next-day or seasonal) with the applicable entity (ies).	The responsible entity failed to coordinate (where confidentiality agreements allow) all three of the following categories of operations (current-day, next-day or seasonal) with the applicable entity (ies).
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					
R11. The Transmission Operator shall perform seasonal, next-day, and current-day Bulk Electric System studies to determine	<i>Balloted Language</i>	N/A	N/A	The Transmission Operator performed seasonal, next-day, and current-day Bulk Electric System studies, reflecting	The Transmission Operator failed to perform seasonal, next-day, or current-day Bulk Electric System studies,

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TOP-002-2a – Normal Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
SOLs. Neighboring Transmission Operators shall utilize identical SOLs for common facilities. The Transmission Operator shall update these Bulk Electric System studies as necessary to reflect current system conditions; and shall make the results of Bulk Electric System studies available to the Transmission Operators, Balancing Authorities (subject confidentiality requirements), and to its Reliability Coordinator.				current system conditions, to determine SOLs, but failed to make the results of Bulk Electric System studies available to all of the Transmission Operators, Balancing Authorities (subject confidentiality requirements), or to its Reliability Coordinator.	reflecting current system conditions, to determine SOLs.
R11	<i>Proposed Change</i>	The Transmission Operator performed and updated the Bulk Electric System studies as necessary to reflect current system conditions but failed to make the results of Bulk Electric System studies available to the Transmission Operators, Balancing Authorities, (subject to confidentiality requirements), and to its Reliability Coordinator.	For common facilities, the Transmission Operator failed to utilize SOLs identical to those used by its neighboring Transmission Operators.	The Transmission Operator performed the required seasonal, next-day, and current-day Bulk Electric System studies to determine SOLs but failed to update the Bulk Electric System studies as necessary to reflect current system conditions.	The Transmission Operator failed to perform seasonal, next-day, and current-day Bulk Electric System studies to determine SOLs.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					
R16. Subject to standards of conduct and confidentiality agreements, Transmission Operators shall, without any intentional time delay, notify their Reliability Coordinator and	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission Operator failed to notify their Reliability Coordinator and Balancing Authority of changes in capabilities

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TOP-002-2a – Normal Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Balancing Authority of changes in capabilities and characteristics including but not limited to:					and characteristics, within the terms and conditions of standards of conduct and confidentiality agreements.
R16.1. Changes in transmission facility status.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission Operator failed to notify their Reliability Coordinator and Balancing Authority of changes in transmission facility status, within the terms and conditions of standards of conduct and confidentiality agreements.
R16.2. Changes in transmission facility rating.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission Operator failed to notify their Reliability Coordinator and Balancing Authority of changes in transmission facility rating, within the terms and conditions of standards of conduct and confidentiality agreements.
R16	<i>Proposed Change</i>	N/A	N/A	Subject to standards of conduct and confidentiality agreements, the Transmission Operator intentionally failed to notify its Reliability Coordinator and	Subject to standards of conduct and confidentiality agreements, the Transmission Operator intentionally failed to notify its Reliability Coordinator and

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TOP-002-2a – Normal Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
				Balancing Authority of changes in transmission facility status (R 16.1) OR Subject to standards of conduct and confidentiality agreements, the Transmission Operator intentionally failed to notify its Reliability Coordinator and Balancing Authority of changes in transmission facility rating (R16.2).	Balancing Authority of changes in transmission facility status (R 16.1) and changes in transmission facility rating (R 16.2).
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.					
R17. Balancing Authorities and Transmission Operators shall, without any intentional time delay, communicate the information described in the requirements R1 to R16 above to their Reliability Coordinator.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity failed to communicate the information described in the requirements R1 to R16 above to their Reliability Coordinator.
R17	<i>Proposed Change</i>	N/A	N/A	N/A	The responsible entity did not communicate the information described in the requirements R1 to R16 above to its Reliability Coordinator. OR

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TOP-002-2a – Normal Operations Planning

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					The responsible entity intentionally delayed communication of the information described in the requirements R1 to R16 to its Reliability Coordinator.

Explanation – The VSL was modified to be consistent with FERC Guideline 3.

TOP-003-1 – Planned Outage Coordination

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Generator Operators and Transmission Operators shall provide planned outage information.	<i>Balloted Language</i>	N/A	N/A	N/A	The Generator Operator failed to provide outage information, in accordance with its Transmission Operators established outage reporting requirements, to its Transmission Operator for scheduled generator outages planned for the next day (any foreseen outage of a generator greater than 50 MW).
R1.1. Each Generator Operator shall provide outage information daily to its Transmission Operator for scheduled generator outages planned for the next day (any foreseen outage of a generator greater than 50 MW). The Transmission Operator shall establish the outage reporting requirements.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission Operator failed to provide outage information, in accordance with its Reliability Coordinators established outage reporting requirement, to its Reliability Coordinator, and to affected Balancing Authorities and Transmission Operators for scheduled generator and bulk transmission outages planned for the next day (any foreseen outage of a transmission line or transformer greater than 100 kV or

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TOP-003-1 – Planned Outage Coordination

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					generator greater than 50 MW) that may collectively cause or contribute to an SOL or IROL violation or a regional operating area limitation.
R1.2. Each Transmission Operator shall provide outage information daily to affected Balancing Authorities and Transmission Operators for scheduled generator and bulk transmission outages planned for the next day (any foreseen outage of a transmission line or transformer greater than 100 kV or generator greater than 50 MW) that may collectively cause or contribute to an SOL or IROL violation or a regional operating area limitation.	<i>Balloted Language</i>	The responsible entity failed to provide the information by 1200 Central Standard Time for the Eastern Interconnection and 1200 Pacific Standard Time for the Western Interconnection.	N/A	N/A	N/A
R1.3. Such information shall be available by 1200 Central Standard Time for the Eastern Interconnection and 1200 Pacific Standard Time for the Western Interconnection.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity failed to plan or coordinate scheduled outages of system voltage regulating equipment, such as automatic voltage regulators on generators, supplementary excitation control, synchronous condensers, shunt and series capacitors, reactors, etc., among affected Balancing

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TOP-003-1 – Planned Outage Coordination

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					Authorities and Transmission Operators when required.
R1	<i>Proposed Change</i>	The responsible entity failed to provide the information by 1200 Central Standard Time for the Eastern Interconnection and 1200 Pacific Standard Time for the Western Interconnection.	N/A	N/A	<p>The Generator Operator failed to provide outage information, in accordance with its Transmission Operators established outage reporting requirements, to its Transmission Operator for scheduled generator outages planned for the next day (any foreseen outage of a generator greater than 50 MW).</p> <p>OR</p> <p>The Transmission Operator failed to provide outage information, in accordance with its Reliability Coordinators established outage reporting requirement, to its Reliability Coordinator, and to affected Balancing Authorities and Transmission Operators for scheduled generator and bulk transmission outages planned for the</p>

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TOP-003-1 – Planned Outage Coordination

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					next day (any foreseen outage of a transmission line or transformer greater than 100 kV or generator greater than 50 MW) that may collectively cause or contribute to an SOL or IROL violation or a regional operating area limitation.
Explanation – Consistent with Guidelines filed with FERC on August 11, 2009 NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. (Note that the original VSL listed for R1 was actually for R1.1.)					
R2. Each Transmission Operator, Balancing Authority, and Generator Operator shall plan and coordinate scheduled outages of system voltage regulating equipment, such as automatic voltage regulators on generators, supplementary excitation control, synchronous condensers, shunt and series capacitors, reactors, etc., among affected Balancing Authorities and Transmission Operators as required.	<i>Balloted Language</i>	The responsible entity planned and coordinated scheduled outages of telemetering and control equipment and associated communication channels with its Reliability Coordinator, but failed to coordinate with affected neighboring Transmission Operators, Balancing Authorities, and Generator Operators.	N/A	N/A	The responsible entity failed to plan and coordinate scheduled outages of telemetering and control equipment and associated communication channels between the affected areas.
R2	<i>Proposed Change</i>	N/A	N/A	N/A	The responsible entity failed to plan or coordinate scheduled outages of system voltage regulating equipment, such as automatic voltage regulators on generators,

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TOP-003-1 – Planned Outage Coordination

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					supplementary excitation control, synchronous condensers, shunt and series capacitors, reactors, etc., among affected Balancing Authorities and Transmission Operators when required.
Explanation – Note that the original VSL listed for R2 was actually for R3.					
R3. Each Transmission Operator, Balancing Authority, and Generator Operator shall plan and coordinate scheduled outages of telemetering and control equipment and associated communication channels between the affected areas.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to resolve any scheduling of potential reliability conflicts.
R3	<i>Proposed Change</i>	N/A	N/A	N/A	The responsible entity failed to plan and coordinate scheduled outages of telemetering and control equipment and associated communication channels between the affected areas.
Explanation – Modified to be consistent with FERC Guideline 3. Note that the original VSL listed for R3 was actually for R4.					
R4. Each Reliability Coordinator shall resolve any scheduling of potential reliability conflicts.	<i>Balloted Language</i>	The Transmission Operator entering an unknown operating state (i.e., any state for which	The Transmission Operator entering an unknown operating state (i.e., any state for which	The Transmission Operator entering an unknown operating state (i.e., any state for which	The Transmission Operator entering an unknown operating state (i.e., any state for

Staff Proposed Changes to Previously Balloted Violation Severity Levels (NUC, TOP, VAR)

TOP-003-1 – Planned Outage Coordination

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		valid operating limits have not been determined), failed to restore operations to respect proven reliable power system limits for more than 30 minutes but less than or equal to 35 minutes.	valid operating limits have not been determined), failed to restore operations to respect proven reliable power system limits for more than 35 minutes but less than or equal to 40 minutes.	valid operating limits have not been determined), failed to restore operations to respect proven reliable power system limits for more than 40 minutes but less than or equal to 45 minutes.	which valid operating limits have not been determined), failed to restore operations to respect proven reliable power system limits for more than 45 minutes.
R4	<i>Proposed Change</i>	N/A	N/A	N/A	The Reliability Coordinator failed to resolve any scheduling of potential reliability conflicts.

Explanation – Note that the original VSL listed for R4 was actually for TOP-004 R4.

TOP-005-1.1 – Operational Reliability Information					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Each Transmission Operator and Balancing Authority shall provide its Reliability Coordinator with the operating data that the Reliability Coordinator requires to perform operational reliability assessments and to coordinate reliable operations within the Reliability Coordinator Area.	<i>Balloted Language</i>	The responsible entity failed to provide all of the data requested by its Reliability Coordinator.	N/A	N/A	The responsible entity failed to provide all of the data requested by its Reliability Coordinator.
R1.1. Each Reliability Coordinator shall identify the data requirements from the list in Attachment 1-TOP-005-0 “Electric System Reliability Data” and any additional operating information requirements relating to operation of the bulk power system within the Reliability Coordinator Area.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to identify the data necessary to perform operational reliability assessments and to coordinate reliable operations within the Reliability Coordinator Area.
R1	<i>Proposed Change</i>	The responsible entity failed to provide to its Reliability Coordinator 5% or less of the operating data that the Reliability Coordinator requested to perform operational reliability assessments and to coordinate reliable operations within the Reliability Coordinator Area.	The responsible entity failed to provide to its Reliability Coordinator more than 5% up to (and including) 10% of the operating data that the Reliability Coordinator requested to perform operational reliability assessments and to coordinate reliable operations within the Reliability Coordinator Area.	The responsible entity failed to provide to its Reliability Coordinator more than 10% up to (and including) 15% of the operating data that the Reliability Coordinator requested to perform operational reliability assessments and to coordinate reliable operations within the Reliability Coordinator Area.	The responsible entity failed to provide to its Reliability Coordinator more than 15% of the operating data that the Reliability Coordinator requested to perform operational reliability assessments and to coordinate reliable operations within the Reliability Coordinator Area.

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TOP-005-1.1 – Operational Reliability Information					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					
R1.1. Each Reliability Coordinator shall identify the data requirements from the list in Attachment 1-TOP-005-0 “Electric System Reliability Data” and any additional operating information requirements relating to operation of the bulk power system within the Reliability Coordinator Area.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to identify the data necessary to perform operational reliability assessments and to coordinate reliable operations within the Reliability Coordinator Area.
R1.1	<i>Proposed Change</i>	The Reliability Coordinator failed to identify 5% or less of the data requirements from Attachment 1 - TOP-005-0 and any additional operating information requirements relating to operation of the bulk power system within the Reliability Coordinator Area	The Reliability Coordinator failed to identify more than 5% up to (and including) 10% of the data requirements from Attachment 1 - TOP-005-0 and any additional operating information requirements relating to operation of the bulk power system within the Reliability Coordinator Area	The Reliability Coordinator failed to identify more than 10% up to (and including) 15% of the data requirements from Attachment 1 - TOP-005-0 and any additional operating information requirements relating to operation of the bulk power system within the Reliability Coordinator Area.	The Reliability Coordinator failed to identify more than 15% of the data requirements from Attachment 1 - TOP-005-0 and any additional operating information requirements relating to operation of the bulk power system within the Reliability Coordinator Area.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R3. Upon request, each Balancing Authority and Transmission Operator shall provide to other Balancing Authorities and Transmission Operators with immediate responsibility for operational	<i>Balloted Language</i>	The responsible entity failed to provide any of the data requested by other Balancing Authorities or Transmission Operators.	N/A	N/A	The responsible entity failed to provide all of the data requested by its host Balancing Authority or Transmission Operator.

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TOP-005-1.1 – Operational Reliability Information					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
	reliability, the operating data that are necessary to allow these Balancing Authorities and Transmission Operators to perform operational reliability assessments and to coordinate reliable operations. Balancing Authorities and Transmission Operators shall provide the types of data as listed in Attachment 1-TOP-005-0 “Electric System Reliability Data,” unless otherwise agreed to by the Balancing Authorities and Transmission Operators with immediate responsibility for operational reliability.				
R3	<i>Proposed Change</i>	The Balancing Authority or Transmission Operator, upon the request of a Balancing Authority or Transmission Operator that has immediate responsibility for operational reliability, failed to provide 5% or less of the operating data necessary to perform operational reliability assessments and to coordinate reliable operations.	The Balancing Authority or Transmission Operator, upon the request of a Balancing Authority or Transmission Operator that has immediate responsibility for operational reliability, failed to provide more than 5% up to (and including) 10% of the operating data necessary to perform operational reliability assessments and to coordinate reliable operations.	The Balancing Authority or Transmission Operator, upon the request of a Balancing Authority or Transmission Operator that has immediate responsibility for operational reliability, failed to provide more than 10% up to (and including) 15% of the operating data necessary to perform operational reliability assessments and to coordinate reliable operations.	The Balancing Authority or Transmission Operator, upon the request of a Balancing Authority or Transmission Operator that has immediate responsibility for operational reliability, failed to provide more than 15% of the operating data necessary to perform operational reliability assessments and to coordinate reliable operations.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R4. Each Purchasing-Selling Entity shall provide information as requested by its Host	<i>Balloted Language</i>	The responsible entity failed to provide any of the data requested by	N/A	N/A	The responsible entity failed to provide all of the data requested by

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TOP-005-1.1 – Operational Reliability Information					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Balancing Authorities and Transmission Operators to enable them to conduct operational reliability assessments and coordinate reliable operations.		other Balancing Authorities or Transmission Operators.			its host Balancing Authority or Transmission Operator.
R4	<i>Proposed Change</i>	The responsible entity failed to provide 5% or less of the data requested by other Balancing Authorities or Transmission Operators.	The responsible entity failed to provide more than 5% up to (and including) 10% of the data requested by other Balancing Authorities or Transmission Operators.	The responsible entity failed to provide more than 10% up to (and including) 15% of the data requested by other Balancing Authorities or Transmission Operators.	The responsible entity failed to provide more than 15% of the data requested by its host Balancing Authority or Transmission Operator.

TOP-005-2 – Operational Reliability Information

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2. Upon request, each Balancing Authority and Transmission Operator shall provide to other Balancing Authorities and Transmission Operators with immediate responsibility for operational reliability, the operating data that are necessary to allow these Balancing Authorities and Transmission Operators to perform operational reliability assessments and to coordinate reliable operations. Balancing Authorities and Transmission Operators shall provide the types of data as listed in Attachment 1-TOP-005 "Electric System Reliability Data," unless otherwise agreed to by the Balancing Authorities and Transmission Operators with immediate responsibility for operational reliability.	<i>Balloted Language</i>	The responsible entity failed to provide any of the data requested by other Balancing Authorities or Transmission Operators.	N/A	N/A	The responsible entity failed to provide all of the data requested by its host Balancing Authority or Transmission Operator.
R2	<i>Proposed Change</i>	The responsible entity provided at least 95%, but not 100%, of the data requested by other Balancing Authorities or Transmission Operators.	The responsible entity provided at least 90%, but not more than 95% of the data requested by other Balancing Authorities or Transmission Operators.	The responsible entity provided at least 85%, but not more than 90% of the data requested by other Balancing Authorities or Transmission Operators.	The responsible entity provided less than 85% of the data requested by other Balancing Authorities or Transmission Operators.
Explanation – Modified to be consistent with FERC Guidelines 1 and 3. Modified for clarity and consistency with other standards and VSLs.					
R3. Each Purchasing-Selling Entity shall provide information as requested by its Host Balancing Authorities and	<i>Balloted Language</i>	The responsible entity failed to provide any of the data requested by other Balancing	N/A	N/A	The responsible entity failed to provide all of the data requested by its host Balancing

Staff Proposed Changes to Previously Balloted Violation Severity Levels (NUC, TOP, VAR)

TOP-005-2 – Operational Reliability Information

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Transmission Operators to enable them to conduct operational reliability assessments and coordinate reliable operations.		Authorities or Transmission Operators.			Authority or Transmission Operator.
R3	<i>Proposed Change</i>	The responsible entity failed to provide 5% or less of the data requested by other Balancing Authorities or Transmission Operators.	The responsible entity failed to provide more than 5% up to (and including) 10% of the data requested by other Balancing Authorities or Transmission Operators.	The responsible entity failed to provide more than 10% up to (and including) 15% of the data requested by other Balancing Authorities or Transmission Operators.	The responsible entity failed to provide more than 15% of the data requested by its host Balancing Authority or Transmission Operator.
Explanation – Modified for clarity and consistency with other standards and VSLs.					

TOP- 006-1 – Monitoring System Conditions

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall monitor applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.	<i>Balloted Language</i>	N/A	The responsible entity monitors the applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, but is not aware of the status of rotating and static reactive resources.	The responsible entity fails to monitor all of the applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of all rotating and static reactive resources.	The responsible entity fails to monitor any of the applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.
R2	<i>Proposed Change</i>	The responsible entity failed to monitor 5% or less of applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.	The responsible entity failed to monitor more than 5% up to (and including) 10% of applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.	The responsible entity failed to monitor more than 10% up to (and including) 15% of applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.	The responsible entity failed to monitor more than 15% of applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R4. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall have information, including weather forecasts and past load patterns, available to predict the system’s near-term load pattern.	<i>Balloted Language</i>	N/A	N/A	The responsible entity has either weather forecasts or past load patterns, available to predict the system’s near-term load pattern, but not both.	The responsible entity failed to have both weather forecasts and past load patterns, available to predict the system’s near-term load pattern.
R4	<i>Proposed Change</i>	N/A	N/A	The responsible entity has either weather forecasts or past load patterns available to predict the system’s near-	The responsible entity failed to have both weather forecasts and past load patterns available to predict the

Staff Proposed Changes to Previously Balloted Violation Severity Levels (NUC, TOP, VAR)

TOP- 006-1 – Monitoring System Conditions

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
				term load pattern, but not both.	system's near-term load pattern.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					

TOP- 006-2 – Monitoring System Conditions

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. Each Transmission Operator and Balancing Authority shall know the status of all generation and transmission resources available for use.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity failed to know the status of all generation and transmission resources available for use, even though said information was reported by the Generator Operator, Transmission Operator, or Balancing Authority.
R1.1. Each Generator Operator shall inform its Host Balancing Authority and the Transmission Operator of all generation resources available for use.	<i>Balloted Language</i>	N/A	N/A	N/A	The Generator Operator failed to inform its Host Balancing Authority and the Transmission Operator of all generation resources available for use.
R1.2. Each Transmission Operator and Balancing Authority shall inform the Reliability Coordinator and other affected Balancing Authorities and Transmission Operators of all generation and transmission resources available for use.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity failed to inform the Reliability Coordinator and other affected Balancing Authorities and Transmission Operators of all generation and transmission resources available for use.
R1	<i>Proposed Change</i>	N/A	N/A	N/A	The responsible entity failed to know the status of all generation and transmission resources available for use, even though said information was

Staff Proposed Changes to Previously Balloted Violation Severity Levels (NUC, TOP, VAR)

TOP- 006-2 – Monitoring System Conditions

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					reported by the Generator Operator, Transmission Operator, or Balancing Authority. OR The Generator Operator failed to inform its Host Balancing Authority and the Transmission Operator of all generation resources available for use. OR The responsible entity failed to inform the Reliability Coordinator and other affected Balancing Authorities and Transmission Operators of all generation and transmission resources available for use.
Explanation – Consistent with Guidelines filed with FERC on August 11, 2009 NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					
R2. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall monitor applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating	<i>Balloted Language</i>	N/A	The responsible entity monitors the applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, but is not aware of the status of rotating and static	The responsible entity fails to monitor all of the applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of all rotating and static	The responsible entity fails to monitor any of the applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of

Staff Proposed Changes to Previously Balloted Violation Severity Levels (NUC, TOP, VAR)

TOP- 006-2 – Monitoring System Conditions

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
and static reactive resources.			reactive resources.	reactive resources.	rotating and static reactive resources.
R2	<i>Proposed Change</i>	The responsible entity failed to monitor 5% or less of applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.	The responsible entity failed to monitor more than 5% up to (and including) 10% of applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.	The responsible entity failed to monitor more than 10% up to (and including) 15% of applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.	The responsible entity failed to monitor more than 15% of applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.
Explanation – Modified to be consistent with FERC Guideline 1. Modified for clarity and consistency with other standards and VSLs.					
R3. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide appropriate technical information concerning protective relays to their operating personnel.	<i>Balloted Language</i>	The responsible entity failed to provide any of the appropriate technical information concerning protective relays to their operating personnel.	N/A	N/A	The responsible entity failed to provide all of the appropriate technical information concerning protective relays to their operating personnel.
R3	<i>Proposed Change</i>	The responsible entity failed to provide 5% or less of the appropriate technical information concerning protective relays to its operating personnel.	The responsible entity failed to provide more than 5% up to (and including) 10% of the appropriate technical information concerning protective relays to its operating personnel.	The responsible entity failed to provide more than 10% up to (and including) 15% of the appropriate technical information concerning protective relays to its operating personnel.	The responsible entity failed to provide more than 15% of the appropriate technical information concerning protective relays to its operating personnel.
Explanation – Modified to be consistent with FERC Guideline 1. Modified for clarity and consistency with other standards and VSLs.					
R4. Each Transmission Operator, and Balancing Authority shall have information, including weather forecasts and	<i>Balloted Language</i>	N/A	N/A	The responsible entity has either weather forecasts or past load patterns, available to	The responsible entity failed to have both weather forecasts and past load patterns,

Staff Proposed Changes to Previously Balloted Violation Severity Levels (NUC, TOP, VAR)

TOP- 006-2 – Monitoring System Conditions

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
past load patterns, available to predict the system's near-term load pattern.				predict the system's near-term load pattern, but not both.	available to predict the system's near-term load pattern.
R4	<i>Proposed Change</i>	N/A	N/A	The responsible entity has either weather forecasts or past load patterns, available to predict the system's near-term load pattern, but not both.	The responsible entity has neither weather forecasts and past load patterns, available to predict the system's near-term load pattern.
Explanation – Modified for clarity and consistency with other standards and VSLs.					
R5. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall use monitoring equipment to bring to the attention of operating personnel important deviations in operating conditions and to indicate, if appropriate, the need for corrective action.	<i>Balloted Language</i>	N/A	N/A	The responsible entity used monitoring equipment to bring to the attention of operating personnel important deviations in operating conditions, but it does not have indication of the need for corrective action.	The responsible entity failed to use monitoring equipment to bring to the attention of operating personnel important deviations in operating conditions.
R5	<i>Proposed Change</i>	N/A	N/A	The responsible entity used monitoring equipment to bring to the attention of operating personnel important deviations in operating conditions, but it does not have indication of the need for corrective action.	The responsible entity failed to use monitoring equipment to bring to the attention of operating personnel important deviations in operating conditions.
Explanation – Modified for clarity and consistency with other standards and VSLs.					

TOP-007-0- Reporting SOL and IROL Violations					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R3. A Transmission Operator shall take all appropriate actions up to and including shedding firm load, or directing the shedding of firm load, in order to comply with Requirement R 2.	<i>Balloted Language</i>	N/A	N/A	N/A	The Transmission Operator failed to take all appropriate actions up to and including shedding firm load, or directing the shedding of firm load, in order to return the transmission system to IROL within 30 minutes.
R3	<i>Proposed Change</i>				The Transmission Operator failed to take all appropriate actions up to and including shedding firm load, or directing the shedding of firm load, in order to return the transmission system to IROL within 30 minutes.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3					
R4. The Reliability Coordinator shall evaluate actions taken to address an IROL or SOL violation and, if the actions taken are not appropriate or sufficient, direct actions required to return the system to within limits.	<i>Balloted Language</i>	N/A	N/A	N/A	The Reliability Coordinator failed to evaluate actions taken to address an IROL or SOL violation and, if the actions taken were not appropriate or sufficient, direct actions required to return the system to within limits.
R4.	<i>Proposed Change</i>	The Reliability Coordinator evaluated actions taken to address an SOL violation and found the actions taken	The Reliability Coordinator did not evaluate actions taken to address an SOL violation and failed to direct	The Reliability Coordinator evaluated actions taken to address an IROL violation and found the actions taken	The Reliability Coordinator failed to evaluate actions taken to address an IROL violation and did not

Staff Proposed Changes to Previously Balloted Violation Severity Levels (NUC, TOP, VAR)

TOP-007-0- Reporting SOL and IROL Violations

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		were inappropriate or insufficient, but failed to direct actions required to return the system to within limits.	actions required to return the system to within limits.	were inappropriate or insufficient, but failed to direct actions required to return the system to within limits.	direct actions required to return the system to within limits.

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

TOP-008-1 – Response to Transmission Limit Violations					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R4. The Transmission Operator shall have sufficient information and analysis tools to determine the cause(s) of SOL violations. This analysis shall be conducted in all operating timeframes. The Transmission Operator shall use the results of these analyses to immediately mitigate the SOL violation.	<i>Balloted Language</i>	N/A	N/A	The Transmission Operator had sufficient information and analysis tools to determine the cause(s) of SOL violations and used the results of these analyses to immediately mitigate the SOL violation(s), but failed to conduct these analyses in all operating timeframes.	The Transmission Operator failed to have sufficient information and analysis tools to determine the cause(s) of SOL violations or failed to use the results of analyses to immediately mitigate the SOL violation.
R4	<i>Proposed Change</i>	N/A	N/A	The Transmission Operator failed to conduct analyses to determine the cause(s) of SOL violations for all operating timeframes.	The Transmission Operator failed to have sufficient information and analysis tools to determine the cause(s) of SOL violations. OR The responsible entity failed to use the results of analyses to immediately mitigate the SOL violation.
Explanation – The VSLs were modified to be consistent with FERC Guideline 2.					

VAR-001-1- Voltage and Reactive Control

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2. Each Transmission Operator shall acquire sufficient reactive resources within its area to protect the voltage levels under normal and Contingency conditions. This includes the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits.	<i>Balloted Language</i>	The Transmission Operator acquired 95% but less than 100% of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions including the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits.	The Transmission Operator acquired 90% but less than 95% of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions including the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits.	The Transmission Operator acquired 85% but less than 90% of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions including the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits.	The Transmission Operator acquired less than 85% of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions including the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits.
R2	<i>Proposed Change</i>	The responsible entity did not acquire 5% or less of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions including the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits.	The responsible entity did not acquire more than 5% up to (and including) 10% of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions, including the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits.	The responsible entity did not acquire more than 10% up to (and including) 15% of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions, including the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits.	The responsible entity did not acquire more than 15% of the reactive resources within its area needed to protect the voltage levels under normal and Contingency conditions, including the Transmission Operator's share of the reactive requirements of interconnecting transmission circuits.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R3.1. Each Transmission Operator shall maintain a list of generators in its area that are exempt from following a voltage or Reactive Power schedule.	<i>Balloted Language</i>	The Transmission Operator maintain the list of generators in its area that are exempt from following a voltage or Reactive Power schedule but is missing	The Transmission Operator maintain the list of generators in its area that are exempt from following a voltage or Reactive Power schedule but is missing two or	The Transmission Operator maintain the list of generators in its area that are exempt from following a voltage or Reactive Power schedule but is missing three or	The Transmission Operator maintain the list of generators in its area that are exempt from following a voltage or Reactive Power schedule but is missing

Staff Proposed Changes to Previously Balloted Violation Severity Levels (NUC, TOP, VAR)

VAR-001-1- Voltage and Reactive Control

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		one or more entities. The missing entities shall represent less than 25% of those eligible for the list	more entities. The missing entities shall represent less than 50% of those eligible for the list	more entities. The missing entities shall represent less than 75% of those eligible for the list	four or more entities. The missing entities shall represent 75% or more of those eligible for the list.
R3.1	<i>Proposed Change</i>	The Transmission Operator maintained the list of generators in its area that are exempt from following a voltage or Reactive Power schedule, but is missing 5% or less of those eligible for the list.	The Transmission Operator maintained the list of generators in its area that are exempt from following a voltage or Reactive Power schedule, but is missing 5% up to (and including) 10% of those eligible for the list.	The Transmission Operator maintained the list of generators in its area that are exempt from following a voltage or Reactive Power schedule, but is missing 10% up to (and including) 15% of those eligible for the list.	The Transmission Operator maintained the list of generators in its area that are exempt from following a voltage or Reactive Power schedule, but is missing more than 15% of those eligible for the list.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R3.2. For each generator that is on this exemption list, the Transmission Operator shall notify the associated Generator Owner.	<i>Balloted Language</i>	The Transmission Operator failed to notify up to 25% of the associated Generator Owner of each generator that are on this exemption list.	The Transmission Operator failed to notify 25% up to 50% of the associated Generator Owners of each generator that are on this exemption list.	The Transmission Operator failed to notify 50% up to 75% of the associated Generator Owner of each generator that are on this exemption list.	The Transmission Operator failed to notify 75% up to 100% of the associated Generator Owner of each generator that are on this exemption list.
R3.2	<i>Proposed Change</i>	The Transmission Operator failed to notify 5% or less of the Generator Owners associated with a generator on the exemption list specified in R3.1.	The Transmission Operator failed to notify more than 5% up to (and including) 10% of the Generator Owners associated with a generator on the exemption list specified in R3.1.	The Transmission Operator failed to notify more than 10% up to (and including) 15% of the Generator Owners associated with a generator on the exemption list specified in R3.1.	The Transmission Operator failed to notify more than 15% of the Generator Owners associated with a generator on the exemption list specified in R3.1.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R4. Each Transmission Operator shall specify a voltage or Reactive Power schedule at	<i>Balloted Language</i>	N/A	N/A	The Transmission Operator provide Voltage or Reactive Power	The Transmission Operator provide No evidence that voltage or

Staff Proposed Changes to Previously Balloted Violation Severity Levels (NUC, TOP, VAR)

VAR-001-1- Voltage and Reactive Control

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
the interconnection between the generator facility and the Transmission Owner's facilities to be maintained by each generator. The Transmission Operator shall provide the voltage or Reactive Power schedule to the associated Generator Operator and direct the Generator Operator to comply with the schedule in automatic voltage control mode (AVR in service and controlling voltage).				schedules were for some but not all generating units as required in R4.	Reactive Power schedules were provided to Generator Operators as required in R4.
R4	<i>Proposed Change</i>	The Transmission Operator failed to direct the Generator Operator to comply with the Voltage or Reactive Power schedules for 5% or less of the generating units as required in R4.	The Transmission Operator failed to direct the Generator Operator to comply with the Voltage or Reactive Power schedules for more than 5% up to (and including) 10% of the generating units as required in R4.	The Transmission Operator failed to direct the Generator Operator to comply with the Voltage or Reactive Power schedules for more than 10% up to (and including) 15% of the generating units as required in R4.	The Transmission Operator failed to direct the Generator Operator to comply with the Voltage or Reactive Power schedules for more than 15% of the generating units as required in R4. OR The Transmission Operator failed to specify a voltage or Reactive Power schedule at the interconnection between the generator facility and the Transmission Owner's facilities to be maintained by each generator.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (NUC, TOP, VAR)

VAR-001-1- Voltage and Reactive Control

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					OR The Transmission Operator failed to provide the voltage or Reactive Power schedule to the associated Generator Operator
Explanation – The VSLs were modified to be consistent with FERC Guideline 2.					
R5. Each Purchasing-Selling Entity shall arrange for (self-provide or purchase) reactive resources to satisfy its reactive requirements identified by its Transmission Service Provider.	<i>Balloted Language</i>	The applicable entity did not arrange for reactive resources, as directed by the requirement, affecting 5% or less of its reactive requirements.	The applicable entity did not arrange for reactive resources, as directed by the requirement, affecting between 5-10% of its reactive requirements.	The applicable entity did not arrange for reactive resources, as directed by the requirement, affecting 10-15%, inclusive, of its reactive requirements.	The applicable entity did not arrange for reactive resources, as directed by the requirement, affecting greater than 15% of its reactive requirements.
R5	<i>Proposed Change</i>	The responsible entity did not arrange for reactive resources, as directed by the requirement, affecting 5% or less of its reactive requirements.	The responsible entity did not arrange for reactive resources, as directed by the requirement, affecting more than 5% up to (and including) 10% of its reactive requirements.	The responsible entity did not arrange for reactive resources, as directed by the requirement, affecting more than 10% up to (and including) 15% of its reactive requirements.	The responsible entity did not arrange for reactive resources, as directed by the requirement, affecting more than 15% of its reactive requirements.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R6. The Transmission Operator shall know the status of all transmission Reactive Power resources, including the status of voltage regulators and power system stabilizers.	<i>Balloted Language</i>	The applicable entity did not know the status of all transmission reactive power resources, including the status of voltage regulators and power system stabilizers, as directed by the requirement, affecting 5% or less of	The applicable entity did not know the status of all transmission reactive power resources, including the status of voltage regulators and power system stabilizers, as directed by the requirement, affecting between 5-10% of the	The applicable entity did not know the status of all transmission reactive power resources, including the status of voltage regulators and power system stabilizers, as directed by the requirement, affecting 10-15%, inclusive, of the	The applicable entity did not know the status of all transmission reactive power resources, including the status of voltage regulators and power system stabilizers, as directed by the requirement, affecting

Staff Proposed Changes to Previously Balloted Violation Severity Levels (NUC, TOP, VAR)

VAR-001-1- Voltage and Reactive Control

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		the required resources.	required resources.	required resources.	15% or greater of required resources.
R6	<i>Proposed Change</i>	The Transmission Operator did not know the status of all transmission reactive power resources, including the status of voltage regulators and power system stabilizers, as directed by the requirement, affecting 5% or less of the required resources.	The Transmission Operator did not know the status of all transmission reactive power resources, including the status of voltage regulators and power system stabilizers, as directed by the requirement, affecting more than 5% up to (and including) 10% of the required resources.	The Transmission Operator did not know the status of all transmission reactive power resources, including the status of voltage regulators and power system stabilizers, as directed by the requirement, affecting more than 10% up to (and including) 15% of the required resources.	The Transmission Operator did not know the status of all transmission reactive power resources, including the status of voltage regulators and power system stabilizers, as directed by the requirement, affecting more than 15% of required resources.

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

R7. The Transmission Operator shall be able to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow.	<i>Balloted Language</i>	The applicable entity was not able to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow, affecting 5% or less of the required devices.	The applicable entity was not able to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow, affecting between 5-10% of the required devices.	The applicable entity was not able to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow, affecting 10-15%, inclusive, of the required devices.	The applicable entity was not able to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow, affecting greater than 15% of the required devices.
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R7	<i>Proposed Change</i>	The Transmission Operator was not able to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow, affecting 5% or less of the required devices.	The Transmission Operator was not able to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow, affecting more than 5% up to (and including) 10% of the required devices.	The Transmission Operator was not able to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow, affecting more than 10% up to (and including) 15% of the required devices.	The Transmission Operator was not able to operate or direct the operation of devices necessary to regulate transmission voltage and reactive flow, affecting more than 15% of the required devices.
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Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (NUC, TOP, VAR)

VAR-001-1- Voltage and Reactive Control

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R8. Each Transmission Operator shall operate or direct the operation of capacitive and inductive reactive resources within its area – including reactive generation scheduling; transmission line and reactive resource switching; and, if necessary, load shedding – to maintain system and Interconnection voltages within established limits.	<i>Balloted Language</i>	The applicable entity did operate or direct the operation of capacitive and inductive reactive resources or load shedding within its area, as directed by the requirement, affecting 5% or less of the required resources.	The applicable entity did operate or direct the operation of capacitive and inductive reactive resources or load shedding within its area, as directed by the requirement, affecting between 5-10% of the required resources.	The applicable entity did operate or direct the operation of capacitive and inductive reactive resources or load shedding within its area, as directed by the requirement, affecting 10-15%, inclusive, of the required resources.	The applicable entity did operate or direct the operation of capacitive and inductive reactive resources or load shedding within its area, as directed by the requirement, affecting greater than 15% of the required resources.
R8	<i>Proposed Change</i>	The Transmission Operator did not operate or direct the operation of capacitive and inductive reactive resources or load shedding within its area, as directed by the requirement, affecting 5% or less of the required resources.	The Transmission Operator did not operate or direct the operation of capacitive and inductive reactive resources or load shedding within its area, as directed by the requirement, affecting more than 5% up to (and including) 10% of the required resources.	The Transmission Operator did not operate or direct the operation of capacitive and inductive reactive resources or load shedding within its area, as directed by the requirement, more than 10% up to (and including) 15% of the required resources.	The Transmission Operator did not operate or direct the operation of capacitive and inductive reactive resources or load shedding within its area, as directed by the requirement, affecting more than 15% of the required resources.
Explanation – The VSLs were modified for clarity and consistency with other standards and requirements.					
R9. Each Transmission Operator shall maintain reactive resources to support its voltage under first Contingency conditions.	<i>Balloted Language</i>	The Transmission Operator maintains 95% or more of the reactive resources needed to support its voltage under first Contingency conditions.	The Transmission Operator maintains 85% or more but less than 95% of the reactive resources needed to support its voltage under first Contingency conditions.	The Transmission Operator maintains 75% or more but less than 85% of the reactive resources needed to support its voltage under first Contingency conditions.	The Transmission Operator maintains less than 75% of the reactive resources needed to support its voltage under first Contingency conditions.
R9.1. Each Transmission Operator shall disperse and locate the reactive resources so that the resources can be applied effectively and quickly	<i>Balloted Language</i>	The applicable entity did not disperse and/or locate the reactive resources, as directed in the requirement,	The applicable entity did not disperse and/or locate the reactive resources, as directed in the requirement, affecting	The applicable entity did not disperse and/or locate the reactive resources, as directed in the requirement, affecting	The applicable entity did not disperse and/or locate the reactive resources, as directed in the requirement,

Staff Proposed Changes to Previously Balloted Violation Severity Levels (NUC, TOP, VAR)

VAR-001-1- Voltage and Reactive Control

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
when Contingencies occur.		affecting greater than 15% of the resources.	greater than 15% of the resources.	greater than 15% of the resources.	affecting greater than 15% of the resources.
R9	<i>Proposed Change</i>	<p>The Transmission Operator did not maintain 5% or less of the reactive resources needed to support its voltage under first Contingency conditions.</p> <p>OR</p> <p>The Transmission Operator did not disperse and/or locate the reactive resources, as directed in the requirement, affecting 5% or less of the resources.</p>	<p>The Transmission Operator did not maintain more than 5% up to (and including) 10% of the reactive resources needed to support its voltage under first Contingency conditions.</p> <p>OR</p> <p>The Transmission Operator entity did not disperse and/or locate the reactive resources, as directed in the requirement, affecting more than 5% up to (and including) 10% of the resources.</p>	<p>The Transmission Operator did not maintain more than 10% up to (and including) 15% of the reactive resources needed to support its voltage under first Contingency conditions.</p> <p>OR</p> <p>The Transmission Operator did not disperse and/or locate the reactive resources, as directed in the requirement, affecting more than 10% up to (and including) 15% of the resources.</p>	<p>The Transmission Operator did not maintain more than 15% of the reactive resources needed to support its voltage under first Contingency conditions.</p> <p>OR</p> <p>The Transmission Operator did not disperse and/or locate the reactive resources, as directed in the requirement, affecting more than 15% of the resources.</p>
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					
R10. Each Transmission Operator shall correct IROL or SOL violations resulting from reactive resource deficiencies (IROL violations must be corrected within 30 minutes) and complete the required IROL or SOL violation reporting.	<i>Balloted Language</i>	The applicable entity did not correct the IROL or SOL violations and/or complete the required IROL or SOL violation reporting, as directed by the requirement, affecting 5% or less of the violations.	The applicable entity did not correct the IROL or SOL violations and/or complete the required IROL or SOL violation reporting, as directed by the requirement, affecting between 5-10% of the violations.	The applicable entity did not correct the IROL or SOL violations and/or complete the required IROL or SOL violation reporting, as directed by the requirement, affecting 10-15%, inclusive, of the violations.	The applicable entity did not correct the IROL or SOL violations and/or complete the required IROL or SOL violation reporting, as directed by the requirement, affecting greater than 15% of the violations.
R10	<i>Proposed Change</i>	The Transmission Operator did not correct the IROL or SOL	The Transmission Operator did not correct the IROL or SOL	The Transmission Operator did not correct the IROL or SOL	The Transmission Operator did not correct the IROL or SOL

Staff Proposed Changes to Previously Balloted Violation Severity Levels (NUC, TOP, VAR)

VAR-001-1- Voltage and Reactive Control

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		violations, resulting from reactive resource deficiencies and complete the required IROL or SOL violation reporting for 5% or less of the applicable occurrences.	violations, resulting from reactive resource deficiencies and complete the required IROL or SOL violation reporting for more than 5% up to (and including) 10%of the applicable occurrences.	violations, resulting from reactive resource deficiencies and complete the required IROL or SOL violation reporting for more than 10% up to (and including) 15%of the applicable occurrences.	violations, resulting from reactive resource deficiencies and complete the required IROL or SOL violation reporting for more than 15% of the applicable occurrences.

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