

## Staff Proposed Changes to Previously Balloted Violation Severity Levels (Protection and Control and Transmission Planning)

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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**PRC-001-1 – Protection System Coordination**

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2. Each Generator Operator and Transmission Operator shall notify reliability entities of relay or equipment failures as follows:	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity failed to notify any reliability entity of relay or equipment failures.
R2.1. If a protective relay or equipment failure reduces system reliability, the Generator Operator shall notify its Transmission Operator and Host Balancing Authority. The Generator Operator shall take corrective action as soon as possible.	<i>Balloted Language</i>	N/A	Notification of relay or equipment failure was not made to the Transmission Operator and Host Balancing Authority, but corrective action was taken.	Notification of relay or equipment failure was made to the Transmission Operator and Host Balancing Authority, but corrective action was not taken.	Notification of relay or equipment failure was not made to the Transmission Operator and Host Balancing Authority, and corrective action was not taken.
R2.2. If a protective relay or equipment failure reduces system reliability, the Transmission Operator shall notify its Reliability Coordinator and affected Transmission Operators and Balancing Authorities. The Transmission Operator shall take corrective action as soon as possible.	<i>Balloted Language</i>	N/A	Notification of relay or equipment failure was not made to the Reliability Coordinator and affected Transmission Operators and Balancing Authorities, but corrective action was taken.	Notification of relay or equipment failure was made to the Reliability Coordinator and affected Transmission Operators and Balancing Authorities, but corrective action was not taken.	Notification of relay or equipment failure was not made to the Reliability Coordinator and affected Transmission Operators and Balancing Authorities, and corrective action was not taken.
R2	<i>Proposed Change</i>	N/A	The responsible entity failed to provide notification of relay or equipment failure that reduced system reliability to the applicable entities, but corrective action was taken as required by R2.1 or R2.2.	Responsible entity provided notification of relay or equipment failure that reduced system reliability to the applicable entities, but corrective action was not taken as required by R2.1 or R2.2.	The responsible entity failed to provide notification of relay or equipment failure that reduced system reliability to the applicable entities, and failed to take corrective action as required by R2.1 or R2.2.

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**PRC-001-1 – Protection System Coordination**

	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
Explanation – The VSLs were modified to be consistent with FERC Guideline 3. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					
R4. Each Transmission Operator shall coordinate protection systems on major transmission lines and interconnections with neighboring Generator Operators, Transmission Operators, and Balancing Authorities.	<i>Balloted Language</i>	The Transmission Operator failed to coordinate protection systems on major transmission lines and interconnections with one of its neighboring Generator Operators, Transmission Operators, or Balancing Authorities.	The Transmission Operator failed to coordinate protection systems on major transmission lines and interconnections with two of its neighboring Generator Operators, Transmission Operators, or Balancing Authorities.	The Transmission Operator failed to coordinate protection systems on major transmission lines and interconnections with three of its neighboring Generator Operators, Transmission Operators, or Balancing Authorities.	The Transmission Operator failed to coordinate protection systems on major transmission lines and interconnections with three or more of its neighboring Generator Operators, Transmission Operators, and Balancing Authorities.
R4	<i>Proposed Change</i>	The Transmission Operator failed to coordinate protection systems on major transmission lines and interconnections with one of its neighboring Generator Operators, Transmission Operators, or Balancing Authorities.	The Transmission Operator failed to coordinate protection systems on major transmission lines and interconnections with two of its neighboring Generator Operators, Transmission Operators, or Balancing Authorities.	The Transmission Operator failed to coordinate protection systems on major transmission lines and interconnections with three of its neighboring Generator Operators, Transmission Operators, or Balancing Authorities.	The Transmission Operator failed to coordinate protection systems on major transmission lines and interconnections with more than three of its neighboring Generator Operators, Transmission Operators, and Balancing Authorities.
Explanation – The VSLs were modified for clarity and consistency with other standards and VSLs.					

<b>PRC-009-0 - Analysis and Documentation of Underfrequency Load Shedding Performance Following an Underfrequency Event</b>					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R2. The Transmission Owner, Transmission Operator, Load-Serving Entity, and Distribution Provider that owns or operates a UFLS program (as required by its Regional Reliability Organization) shall provide documentation of the analysis of the UFLS program to its Regional Reliability Organization and NERC on request 90 calendar days after the system event.	<i>Balloted Language</i>	The responsible entity has provided the documentation in more than 90 calendar days but less than 105 calendar days.	The responsible entity has provided the documentation in more than 105 calendar days but less than 129 calendar days.	The responsible entity has provided the documentation in more than 129 calendar days but less than 145 calendar days.	The responsible entity has provided the documentation in 145 calendar days or more.
R2	<i>Proposed Change</i>	The responsible entity has provided the documentation in more than 90 calendar days but less than 100 calendar days.	The responsible entity has provided the documentation in more than 100 calendar days but less than 110 calendar days.	The responsible entity has provided the documentation in more than 110 calendar days but less than 120 calendar days.	The responsible entity has provided the documentation more than 120 calendar days after the system event.  OR  The responsible entity has not provided the documentation.
Explanation – The VSLs were modified to be consistent with FERC Guideline 3.					

<b>PRC-017-0 – System Protection System Maintenance and Testing</b>					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
	<i>Balloted Language</i>	The responsible entity provided documentation of its SPS maintenance and testing program more than 30 but less than or equal to 40 days following a request from its Regional Reliability Organization and/or NERC.	The responsible entity provided documentation of its SPS maintenance and testing program more than 40 but less than or equal to 50 days following a request from its Regional Reliability Organization and/or NERC.	The responsible entity provided documentation of its SPS maintenance and testing program more than 50 but less than or equal to 60 days following a request from its Regional Reliability Organization and/or NERC.	The responsible entity did not provide documentation of its SPS maintenance and testing program for more than 60 days following a request from its Regional Reliability Organization and/or NERC.
R2	<i>Proposed Change</i>	The responsible entity provided documentation of its SPS maintenance and testing program more than 30 but less than or equal to 40 days following a request from its Regional Reliability Organization and/or NERC.	The responsible entity provided documentation of its SPS maintenance and testing program more than 40 but less than or equal to 50 days following a request from its Regional Reliability Organization and/or NERC.	The responsible entity provided documentation of its SPS maintenance and testing program more than 50 but less than or equal to 60 days following a request from its Regional Reliability Organization and/or NERC.	The responsible entity provided documentation of its SPS maintenance and testing program and its implementation more than 60 calendar days following a request from its Regional Reliability Organization or NERC. OR The responsible entity did not provide documentation of its SPS maintenance and testing program and its implementation following a request from its Regional Reliability Organization and/or NERC.
Explanation – The VSLs were modified to be consistent with FERC Guideline 2 and 3.					

<b>PRC-018-1 - Disturbance Monitoring Equipment Installation and Data Reporting</b>					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R6. Each Transmission Owner and Generator Owner that is required by its Regional Reliability Organization to have DMEs shall have a maintenance and testing program for those DMEs that includes:	<i>Balloted Language</i>	N/A	N/A	The responsible entity is not compliant in that the maintenance and testing program for DMEs does not include one of the elements in R6.1 and 6.2.	The responsible entity is not compliant in that the maintenance and testing program for DMEs does not include any of the elements in R6.1 and 6.2.
R6.1. Maintenance and testing intervals and their basis.		The responsible entity's DME maintenance and testing program was non-compliant in that documentation of maintenance and testing intervals and their basis was missing for no more than 25% of the DME equipment.	The responsible entity's DME maintenance and testing program was non-compliant in that documentation of maintenance and testing intervals and their basis was missing for more than 25% but less than or equal to 50% of the DME equipment.	The responsible entity's DME maintenance and testing program was non-compliant in that documentation of maintenance and testing intervals and their basis was missing for more than 50% but less than or equal to 75% of the DME equipment.	The responsible entity's DME maintenance and testing program was non-compliant in that documentation of maintenance and testing intervals and their basis was missing for more than 75% of the DME equipment.
R6.2. Summary of maintenance and testing procedures.		The responsible entity's DME maintenance and testing program was non-compliant in that the summary of maintenance and testing procedures documentation was missing for no more than 25% of the DME equipment.	The responsible entity's DME maintenance and testing program was non-compliant in that the summary of maintenance and testing procedures documentation was missing for more than 25% but less than or equal to 50% of the DME equipment.	The responsible entity's DME maintenance and testing program was non-compliant in that the summary of maintenance and testing procedures documentation was missing for more than 50% but less than or equal to 75% of the DME equipment.	The responsible entity's DME maintenance and testing program was non-compliant in that the summary of maintenance and testing procedures documentation was missing for more than 75% of the DME equipment.
R6	<i>Proposed Change</i>	N/A	N/A	The responsible entity's maintenance and testing program for DMEs does not include one of the components listed in R6.1	The responsible entity's maintenance and testing program for DMEs does not include any of the components

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<b>PRC-018-1 - Disturbance Monitoring Equipment Installation and Data Reporting</b>					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
				and 6.2.	listed in R6.1 and 6.2.
<p>Explanation – The VSLs were modified to be consistent with FERC Guideline 2.                      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.</p>					

<b>TPL-001-0.1 - System Performance Under Normal (No Contingency) Conditions (Category A)</b>					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. The Planning Authority and Transmission Planner shall each demonstrate through a valid assessment that its portion of the interconnected transmission system is planned such that, with all transmission facilities in service and with normal (pre-contingency) operating procedures in effect, the Network can be operated to supply projected customer demands and projected Firm (non-recallable reserved) Transmission Services at all Demand levels over the range of forecast system demands, under the conditions defined in Category A of Table I. To be considered valid, the Planning Authority and Transmission Planner assessments shall:	<i>Balloted Language</i>	The responsible entity is non-compliant with 25% or less of the sub-components.	The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components.	The responsible entity is non-compliant with 50% or more but less than 75% of the sub-components.	The responsible entity is non-compliant with 75% or more of the sub-components.
R1.1. Be made annually.	<i>Balloted Language</i>	N/A	N/A	N/A	The assessments were not made on an annual basis.
R1.2. Be conducted for near-term (years one through five) and longer-term (years six through ten) planning horizons.	<i>Balloted Language</i>	The responsible entity has failed to demonstrate a valid assessment for the long-term period, but a valid assessment for the near-term period exists.	The responsible entity has failed to demonstrate a valid assessment for the near-term period, but a valid assessment for the long-term period exists.	N/A	The responsible entity has failed to demonstrate a valid assessment for the near-term period AND long-term planning period.
R1.3. Be supported by a current or past study and/or system simulation testing that addresses each of the following	<i>Balloted Language</i>	The responsible entity is non-compliant with 25% or less of the sub-components.	The responsible entity is non-compliant with more than 25% but less than 50% of the sub-	The responsible entity is non-compliant with 50% or more but less than 75% of the sub-	The responsible entity is non-compliant with 75% or more of the sub-components.

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<b>TPL-001-0.1 - System Performance Under Normal (No Contingency) Conditions (Category A)</b>					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
categories, showing system performance following Category A of Table 1 (no contingencies). The specific elements selected (from each of the following categories) shall be acceptable to the associated Regional Reliability Organization(s).			components.	components.	
R1.3.1. Cover critical system conditions and study years as deemed appropriate by the entity performing the study.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity has failed to cover critical system conditions and study years as deemed appropriate.
R1.3.2. Be conducted annually unless changes to system conditions do not warrant such analyses.	<i>Balloted Language</i>	The responsible entity's most recent long-term studies (and/or system simulation testing) were not performed in the most recent annual period AND significant system changes (actual or proposed) indicate that past studies (and/or system testing) are no longer valid.	The responsible entity's most recent near-term studies (and/or system simulation testing) were not performed in the most recent annual period AND significant system changes (actual or proposed) indicate that past studies (and/or system testing) are no longer valid.	N/A	The responsible entity's most recent near-term studies (and/or system testing) AND most recent long-term studies (and/or system simulation testing) were not performed in the most recent annual period AND significant system changes (actual or proposed) indicate that past studies (and/or system testing) are no longer valid.
R1.3.3. Be conducted beyond the five-year horizon only as needed to address identified marginal conditions that may have longer lead-time solutions.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity failed to produce evidence of a past or current year long-term study and/or system simulation testing (beyond 5-year planning horizon) when past or current year

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<b>TPL-001-0.1 - System Performance Under Normal (No Contingency) Conditions (Category A)</b>					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					near-term studies and/or system simulation testing show marginal conditions that may require longer lead-time solutions.
R1.3.4. Have established normal (pre-contingency) operating procedures in place.	<i>Balloted Language</i>	N/A	N/A	N/A	No precontingency operating procedures are in place for existing facilities.
R1.3.5. Have all projected firm transfers modeled.	<i>Balloted Language</i>	The system model(s) used for current or past analysis did not properly represent up to (but less than) 25% of the firm transfers to/from the responsible entity's service territory.	The system model(s) used for current or past analysis did not properly represent 25% or more but less than 50% of the firm transfers to/from the responsible entity's service territory.	The system model(s) used for current or past analysis did not properly represent 50% or more but less than 75% of the firm transfers to/from the responsible entity's service territory.	The system model(s) used for current or past analysis did not properly represent 75% or more of the firm transfers to/from the responsible entity's service territory.
R1.3.6. Be performed for selected demand levels over the range of forecast system demands.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity has failed to produce evidence of a valid current or past study and/or system simulation testing reflecting analysis over a range of forecast system demands.
R1.3.7. Demonstrate that system performance meets Table 1 for Category A (no contingencies).	<i>Balloted Language</i>	N/A	N/A	N/A	No past or current study results exist showing pre-contingency system analysis.
R1.3.8. Include existing and planned facilities.	<i>Balloted Language</i>	The responsible entity's transmission model used for past or current studies and/or system simulation testing	The responsible entity's transmission model used for past or current studies and/or system simulation testing properly reflects	N/A	The responsible entity's transmission model used for past or current studies and/or system simulation testing is

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TPL-001-0.1 - System Performance Under Normal (No Contingency) Conditions (Category A)					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		properly reflects existing facilities, but is deficient in reflecting planned facilities.	planned facilities, but is deficient in reflecting existing facilities.		deficient in reflecting existing AND planned facilities.
R1.3.9. Include Reactive Power resources to ensure that adequate reactive resources are available to meet system performance.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity has failed to ensure in a past or current study and/or system simulation testing that sufficient reactive power resources are available to meet required system performance.
R1.4. Address any planned upgrades needed to meet the performance requirements of Category A.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity has failed to demonstrate that a corrective action plan exists in order to satisfy Category A planning requirements.
R1	<i>Proposed Change</i>	The responsible entity has failed to demonstrate a valid assessment for the long-term period, but a valid assessment for the near-term period exists. (R 1.2) OR The responsible entity is non-compliant with one of the sub-components of requirement R1.3 (R1.3.1 through R1.3.9)	The responsible entity has failed to demonstrate a valid assessment for the near-term period, but a valid assessment for the long-term period exists. (R1.2) OR The responsible entity is non-compliant with two of the sub-components of requirement R1.3 (R1.3.1 through 1.3.9)	The responsible entity is non-compliant with three of the sub-components of requirement R1.3 (R1.3.1 through 1.3.9).	The responsible entity did not perform the transmission assessments annually. (R1.1) OR The responsible entity has failed to demonstrate a valid assessment for the near-term period and long-term planning period. (R1.2) OR The responsible entity is non-compliant with four or more of the sub-

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<b>TPL-001-0.1 - System Performance Under Normal (No Contingency) Conditions (Category A)</b>					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					components of requirement R1.3 (R1.3.1 through 1.3.9) OR The responsible entity has failed to demonstrate that a corrective action plan exists in order to satisfy Category A planning requirements. (R1.4)
Explanation – The VSLS were modified to be consistent with FERC Guideline 3. Consistent with Guidelines filed with FERC on August 11, 2009, the VSLDT incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					

<b>TPL-002-0 - System Performance Following Loss of a Single Bulk Electric System Element (Category B)</b>					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. The Planning Authority and Transmission Planner shall each demonstrate through a valid assessment that its portion of the interconnected transmission system is planned such that the Network can be operated to supply projected customer demands and projected Firm (non-recallable reserved) Transmission Services, at all demand levels over the range of forecast system demands, under the contingency conditions as defined in Category B of Table I. To be valid, the Planning Authority and Transmission Planner assessments shall:	<i>Balloted Language</i>	The responsible entity is non-compliant with 25% or less of the sub-components.	The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components.	The responsible entity is non-compliant with 50% or more but less than 75% of the sub-components.	The responsible entity is non-compliant with 75% or more of the sub-components.
R1.1. Be made annually.	<i>Balloted Language</i>	N/A	N/A	N/A	The assessments were not made on an annual basis.
R1.2. Be conducted for near-term (years one through five) and longer-term (years six through ten) planning horizons.	<i>Balloted Language</i>	The responsible entity has failed to demonstrate a valid assessment for the long-term period, but a valid assessment for the near-term period exists.	The responsible entity has failed to demonstrate a valid assessment for the near-term period, but a valid assessment for the long-term period exists.	N/A	The responsible entity has failed to demonstrate a valid assessment for the near-term period AND long-term planning period.
R1.3. Be supported by a current or past study and/or system simulation testing that addresses each of the following categories, showing system	<i>Balloted Language</i>	The responsible entity is non-compliant with 25% or less of the sub-components.	The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components.	The responsible entity is non-compliant with 50% or more but less than 75% of the sub-components.	The responsible entity is non-compliant with 75% or more of the sub-components.

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TPL-002-0 - System Performance Following Loss of a Single Bulk Electric System Element (Category B)					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
performance following Category B of Table 1 (single contingencies). The specific elements selected (from each of the following categories) for inclusion in these studies and simulations shall be acceptable to the associated Regional Reliability Organization(s).					
R1.3.1. Be performed and evaluated only for those Category B contingencies that would produce the more severe System results or impacts. The rationale for the contingencies selected for evaluation shall be available as supporting information. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information.	<i>Balloted Language</i>	N/A	The responsible entity provided evidence through current or past studies and/or system simulation testing that selected NERC Category B contingencies were evaluated, however, no rational was provided to indicate why the remaining Category B contingencies for their system were not evaluated.	N/A	The responsible entity did not provided evidence through current or past studies and/or system simulation testing to indicate that any NERC Category B contingencies were evaluated.
R1.3.2. Cover critical system conditions and study years as deemed appropriate by the responsible entity.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity has failed to cover critical system conditions and study years as deemed appropriate.
R1.3.3. Be conducted annually unless changes to system conditions do not warrant such analyses.	<i>Balloted Language</i>	The responsible entity's most recent long-term studies (and/or system simulation testing) were not performed in the most recent annual period AND significant	The responsible entity's most recent near-term studies (and/or system simulation testing) were not performed in the most recent annual period AND significant system	N/A	The responsible entity's most recent near-term studies (and/or system simulation testing) AND most recent long-term studies (and/or system testing) were not

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TPL-002-0 - System Performance Following Loss of a Single Bulk Electric System Element (Category B)					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		system changes (actual or proposed) indicate that past studies (and/or system testing) are no longer valid.	changes (actual or proposed) indicate that past studies (and/or system testing) are no longer valid.		performed in the most recent annual period AND significant system changes (actual or proposed) indicate that past studies (and/or system simulation testing) are no longer valid.
R1.3.4. Be conducted beyond the five-year horizon only as needed to address identified marginal conditions that may have longer lead-time solutions.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity failed to produce evidence of a past or current year long-term study and/or system simulation testing (beyond 5-year planning horizon) when past or current year near-term studies and/or system simulation testing show marginal conditions that may require longer lead-time solutions.
R1.3.5. Have all projected firm transfers modeled.	<i>Balloted Language</i>	The system model(s) used for current or past analysis did not properly represent up to (but less than) 25% of the firm transfers to/from the responsible entity's service territory.	The system model(s) used for current or past analysis did not properly represent 25% or more but less than 50% of the firm transfers to/from the responsible entity's service territory.	The system model(s) used for current or past analysis did not properly represent 50% or more but less than 75% of the firm transfers to/from the responsible entity's service territory.	The system model(s) used for current or past analysis did not properly represent 75% or more of the firm transfers to/from the responsible entity's service territory.
R1.3.6. Be performed and evaluated for selected demand levels over the range of forecast system Demands.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity has failed to produce evidence of a valid current or past study

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TPL-002-0 - System Performance Following Loss of a Single Bulk Electric System Element (Category B)					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					and/or system simulation testing reflecting analysis over a range of forecast system demands.
R1.3.7. Demonstrate that system performance meets Category B contingencies.	<i>Balloted Language</i>	N/A	N/A	N/A	No past or current study results exist showing Category B contingency system analysis.
R1.3.8. Include existing and planned facilities.	<i>Balloted Language</i>	The responsible entity's transmission model used for past or current studies and/or system simulation testing properly reflects existing facilities, but is deficient in reflecting planned facilities.	The responsible entity's transmission model used for past or current studies and/or system simulation testing properly reflects planned facilities, but is deficient in reflecting existing facilities.	N/A	The responsible entity's transmission model used for past or current studies and/or system simulation testing is deficient in reflecting existing AND planned facilities.
R1.3.9. Include Reactive Power resources to ensure that adequate reactive resources are available to meet system performance.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity has failed to ensure in a past or current study and/or system simulation testing that sufficient reactive power resources are available to meet required system performance.
R1.3.10. Include the effects of existing and planned protection systems, including any backup or redundant systems.	<i>Balloted Language</i>	N/A	N/A	The responsible entity's transmission model used for past or current studies is deficient with respect to the effects of planned protection systems, including any backup or	The responsible entity's transmission model used for past or current studies is deficient with respect to the effects of existing protection systems, including any

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TPL-002-0 - System Performance Following Loss of a Single Bulk Electric System Element (Category B)					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
				redundant systems.	backup or redundant systems.
R1.3.11. Include the effects of existing and planned control devices.	<i>Balloted Language</i>	N/A	N/A	The responsible entity's transmission model used for past or current studies is deficient with respect to the effects of planned control devices.	The responsible entity's transmission model used for past or current studies is deficient with respect to the effects of existing control devices.
R1.3.12. Include the planned (including maintenance) outage of any bulk electric equipment (including protection systems or their components) at those demand levels for which planned (including maintenance) outages are performed.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity's transmission model used for past or current studies is deficient with respect to the inclusion of planned maintenance outages of bulk electric transmission facilities.
R1.4. Address any planned upgrades needed to meet the performance requirements of Category B of Table I.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity has failed to demonstrate that a corrective action plan exists in order to satisfy Category B planning requirements.
R1.5. Consider all contingencies applicable to Category B.	<i>Balloted Language</i>	The responsible entity has considered the NERC Category B contingencies applicable to their system, but was deficient with respect to 25% or less of all applicable contingencies.	The responsible entity has considered the NERC Category B contingencies applicable to their system, but was deficient with respect to more than 25% but less than 50% of all applicable contingencies.	The responsible entity has considered the NERC Category B contingencies applicable to their system, but was deficient with respect to more than 50% but less than 75% of all applicable contingencies.	The responsible entity has considered the NERC Category B contingencies applicable to their system, but was deficient 75% or more of all applicable contingencies.
R1	<i>Proposed Change</i>	The responsible entity has failed to	The responsible entity has failed to demonstrate	The responsible entity is non-compliant with three	The responsible entity did not perform the

TPL-002-0 - System Performance Following Loss of a Single Bulk Electric System Element (Category B)					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		<p>demonstrate a valid assessment for the long-term period, but a valid assessment for the near-term period exists. (R 1.2)</p> <p>OR</p> <p>The responsible entity is non-compliant with one of the sub-components of requirement R1.3 (R1.3.1 through R1.3.12).</p> <p>OR</p> <p>The responsible entity has considered the NERC Category B contingencies applicable to their system, but was deficient with respect to 5% or less of all applicable contingencies. (R1.5)</p>	<p>a valid assessment for the near-term period, but a valid assessment for the long-term period exists. (R1.2)</p> <p>OR</p> <p>The responsible entity is non-compliant with two of the sub-components of requirement R1.3 (R1.3.1 through 1.3.12).</p> <p>OR</p> <p>The responsible entity has considered the NERC Category B contingencies applicable to their system, but was deficient with respect to more than 5% up to (and including) 10% of all applicable contingencies. (R1.5)</p>	<p>of the sub-components of requirement R1.3 (R1.3.1 through 1.3.12).</p> <p>OR</p> <p>The responsible entity has considered the NERC Category B contingencies applicable to their system, but was deficient with respect to more than 10% up to (and including) 15% of all applicable contingencies. (R1.5)</p>	<p>transmission assessments annually. (R1.1)</p> <p>OR</p> <p>The responsible entity has failed to demonstrate a valid assessment for the near-term period and long-term planning period. (R1.2)</p> <p>OR</p> <p>The responsible entity is non-compliant with four or more of the sub-components of requirement R1.3 (R1.3.1 through 1.3.12).</p> <p>OR</p> <p>The responsible entity has failed to demonstrate that a corrective action plan exists in order to satisfy Category B planning requirements. (R1.4)</p> <p>OR</p> <p>The responsible entity has considered the NERC Category B contingencies applicable to their system, but was deficient with respect to more than 15% of all applicable contingencies. (R1.5)</p>

Staff Proposed Changes to Previously Balloted Violation Severity Levels (PRC, TPL)

**TPL-002-0 - System Performance Following Loss of a Single Bulk Electric System Element (Category B)**

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

<b>TPL-003-0 - System Performance Following Loss of Two or More Bulk Electric System Elements (Category C)</b>					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1. The Planning Authority and Transmission Planner shall each demonstrate through a valid assessment that its portion of the interconnected transmission systems is planned such that the network can be operated to supply projected customer demands and projected Firm (non-recallable reserved) Transmission Services, at all demand Levels over the range of forecast system demands, under the contingency conditions as defined in Category C of Table I (attached). The controlled interruption of customer Demand, the planned removal of generators, or the Curtailment of firm (non-recallable reserved) power transfers may be necessary to meet this standard. To be valid, the Planning Authority and Transmission Planner assessments shall:	<i>Balloted Language</i>	The responsible entity is non-compliant with 25% or less of the sub-components.	The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components.	The responsible entity is non-compliant with 50% or more but less than 75% of the sub-components.	The responsible entity is non-compliant with 75% or more of the sub-components.
R1.1. Be made annually.	<i>Balloted Language</i>	N/A	N/A	N/A	The assessments were not made on an annual basis.
R1.2. Be conducted for near-term (years one through five) and longer-term (years six through ten) planning horizons.	<i>Balloted Language</i>	The responsible entity has failed to demonstrate a valid assessment for the long-term period, but a valid assessment for the near-	The responsible entity has failed to demonstrate a valid assessment for the near-term period, but a valid assessment for the long-term period	N/A	The responsible entity has failed to demonstrate a valid assessment for the near-term period AND long-term planning

Staff Proposed Changes to Previously Balloted Violation Severity Levels (PRC, TPL)

<b>TPL-003-0 - System Performance Following Loss of Two or More Bulk Electric System Elements (Category C)</b>					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
		term period exists.	exists.		period.
R1.3. Be supported by a current or past study and/or system simulation testing that addresses each of the following categories, showing system performance following Category C of Table 1 (multiple contingencies). The specific elements selected (from each of the following categories) for inclusion in these studies and simulations shall be acceptable to the associated Regional Reliability Organization(s).	<i>Balloted Language</i>	The responsible entity is non-compliant with 25% or less of the sub-components.	The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components.	The responsible entity is non-compliant with 50% or more but less than 75% of the sub-components.	The responsible entity is non-compliant with 75% or more of the sub-components.
R1.3.1. Be performed and evaluated only for those Category C contingencies that would produce the more severe system results or impacts. The rationale for the contingencies selected for evaluation shall be available as supporting information. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information.	<i>Balloted Language</i>	N/A	The responsible entity provided evidence through current or past studies that selected NERC Category C contingencies were evaluated, however, no rationale was provided to indicate why the remaining Category C contingencies for their system were not evaluated.	N/A	The responsible entity did not provide evidence through current or past studies to indicate that any NERC Category C contingencies were evaluated.
R1.3.2. Cover critical system conditions and study years as deemed appropriate by the responsible entity.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity has failed to cover critical system conditions and study years as deemed appropriate.
R1.3.3. Be conducted annually unless changes to system	<i>Balloted Language</i>	The responsible entity's most recent long-term	The responsible entity's most recent near-term	N/A	The responsible entity's most recent near-term

Staff Proposed Changes to Previously Balloted Violation Severity Levels (PRC, TPL)

<b>TPL-003-0 - System Performance Following Loss of Two or More Bulk Electric System Elements (Category C)</b>					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
conditions do not warrant such analyses.		studies (and/or system simulation testing) were not performed in the most recent annual period AND significant system changes (actual or proposed) indicate that past studies (and/or system testing) are no longer valid.	studies (and/or system simulation testing) were not performed in the most recent annual period AND significant system changes (actual or proposed) indicate that past studies (and/or system testing) are no longer valid.		studies (and/or system simulation testing) AND most recent long-term studies (and/or system testing) were not performed in the most recent annual period AND significant system changes (actual or proposed) indicate that past studies (and/or system simulation testing) are no longer valid.
R1.3.4. Be conducted beyond the five-year horizon only as needed to address identified marginal conditions that may have longer lead-time solutions.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity failed to produce evidence of a past or current year long-term study and/or system simulation testing (beyond 5-year planning horizon) when past or current year near-term studies and/or system testing show marginal conditions that may require longer lead-time solutions.
R1.3.5. Have all projected firm transfers modeled.	<i>Balloted Language</i>	The system model(s) used for current or past analysis did not properly represent up to (but less than) 25% of the firm transfers to/from the responsible entity's service territory.	The system model(s) used for current or past analysis did not properly represent 25% or more but less than 50% of the firm transfers to/from the responsible entity's service territory.	The system model(s) used for current or past analysis did not properly represent 50% or more but less than 75% of the firm transfers to/from the responsible entity's service territory.	The system model(s) used for current or past analysis did not properly represent 75% or more of the firm transfers to/from the responsible entity's service territory.

Staff Proposed Changes to Previously Balloted Violation Severity Levels (PRC, TPL)

<b>TPL-003-0 - System Performance Following Loss of Two or More Bulk Electric System Elements (Category C)</b>					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
R1.3.6. Be performed and evaluated for selected demand levels over the range of forecast system demands.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity has failed to produce evidence of a valid current or past study and/or system simulation testing reflecting analysis over a range of forecast system demands.
R1.3.7. Demonstrate that System performance meets Table 1 for Category C contingencies.	<i>Balloted Language</i>	N/A	N/A	N/A	No past or current study results exists showing Category C contingency system analysis.
R1.3.8. Include existing and planned facilities.	<i>Balloted Language</i>	The responsible entity's transmission model used for past or current studies and/or system simulation testing properly reflects existing facilities, but is deficient in reflecting planned facilities.	The responsible entity's transmission model used for past or current studies and/or system simulation testing properly reflects planned facilities, but is deficient in reflecting existing facilities.	N/A	The responsible entity's transmission model used for past or current studies and/or system simulation testing is deficient in reflecting existing AND planned facilities.
R1.3.9. Include Reactive Power resources to ensure that adequate reactive resources are available to meet System performance.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity has failed to ensure in a past or current study and/or system simulation testing that sufficient reactive power resources are available to meet required system performance.
R1.3.10. Include the effects of existing and planned protection systems, including any backup or redundant systems.	<i>Balloted Language</i>	N/A	N/A	The responsible entity's transmission model used for past or current studies is deficient with respect to	The responsible entity's transmission model used for past or current studies is deficient with

Staff Proposed Changes to Previously Balloted Violation Severity Levels (PRC, TPL)

<b>TPL-003-0 - System Performance Following Loss of Two or More Bulk Electric System Elements (Category C)</b>					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
				the effects of planned protection systems, including any backup or redundant systems.	respect to the effects of existing protection systems, including any backup or redundant systems.
R1.3.11. Include the effects of existing and planned control devices.	<i>Balloted Language</i>	N/A	N/A	The responsible entity's transmission model used for past or current studies is deficient with respect to the effects of planned control devices.	The responsible entity's transmission model used for past or current studies is deficient with respect to the effects of existing control devices.
R1.3.12. Include the planned (including maintenance) outage of any bulk electric equipment (including protection systems or their components) at those Demand levels for which planned (including maintenance) outages are performed.	<i>Balloted Language</i>	N/A	N/A	N/A	The responsible entity's transmission model used for past or current studies is deficient with respect to the inclusion of planned maintenance outages of bulk electric transmission facilities.
R1.4. Address any planned upgrades needed to meet the performance requirements of Category C.	<i>Balloted Language</i>	The responsible entity is non-compliant with 25% or less of the sub-components.	The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components.	The responsible entity is non-compliant with 50% or more but less than 75% of the sub-components.	The responsible entity is non-compliant with 75% or more of the sub-components.
R1.5. Consider all contingencies applicable to Category C.	<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	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	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	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

Staff Proposed Changes to Previously Balloted Violation Severity Levels (PRC, TPL)

TPL-003-0 - System Performance Following Loss of Two or More Bulk Electric System Elements (Category C)					
	VSL	Lower	Moderate	High	Severe
		interconnecting transmission circuits.	transmission circuits.	transmission circuits.	of interconnecting transmission circuits.
R1	<i>Proposed Change</i>	<p>The responsible entity has failed to demonstrate a valid assessment for the long-term period, but a valid assessment for the near-term period exists. (R 1.2)</p> <p>OR</p> <p>The responsible entity is non-compliant with one of the sub-components of requirement R1.3 (R1.3.1 through R1.3.12).</p> <p>OR</p> <p>The responsible entity has considered the NERC Category C contingencies applicable to their system, but was deficient with respect to 5% or less of all applicable contingencies. (R1.5)</p>	<p>The responsible entity has failed to demonstrate a valid assessment for the near-term period, but a valid assessment for the long-term period exists. (R1.2)</p> <p>OR</p> <p>The responsible entity is non-compliant with two of the sub-components of requirement R1.3 (R1.3.1 through 1.3.12).</p> <p>OR</p> <p>The responsible entity has considered the NERC Category C contingencies applicable to their system, but was deficient with respect to more than 5% up to (and including) 10% of all applicable contingencies. (R1.5)</p>	<p>The responsible entity is non-compliant with three of the sub-components of requirement R1.3 (R1.3.1 through 1.3.12).</p> <p>OR</p> <p>The responsible entity has considered the NERC Category C contingencies applicable to their system, but was deficient with respect to more than 10% up to (and including) 15% of all applicable contingencies. (R1.5)</p>	<p>The responsible entity did not perform the transmission assessments annually. (R1.1)</p> <p>OR</p> <p>The responsible entity has failed to demonstrate a valid assessment for the near-term period and long-term planning period. (R1.2)</p> <p>OR</p> <p>The responsible entity is non-compliant with four or more of the sub-components of requirement R1.3 (R1.3.1 through 1.3.12).</p> <p>OR</p> <p>The responsible entity has failed to demonstrate that a corrective action plan exists in order to satisfy Category C planning requirements. (R1.4)</p> <p>OR</p> <p>The responsible entity has considered the NERC Category C contingencies applicable to their system, but was deficient with respect to more than 15% of all</p>

Staff Proposed Changes to Previously Balloted Violation Severity Levels (PRC, TPL)

<b>TPL-003-0 - System Performance Following Loss of Two or More Bulk Electric System Elements (Category C)</b>					
	<i>VSL</i>	<i>Lower</i>	<i>Moderate</i>	<i>High</i>	<i>Severe</i>
					applicable contingencies. (R1.5)
Explanation – Consistent with Guidelines filed with FERC on August 11, 2009, the VSLDT incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.					