

Official Comment Form for Draft 2 of the VSLs for the Emergency Operations Standards

Please use this form to submit comments on the proposed Violation Severity Levels (VSLs) for the Emergency Operations series of standards.

Comments must be submitted by May 8, 2009. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "EOP VSLs" in the subject line. If you have any questions on the subject information please contact Al Calafiore at Al.Calafiore@nerc.net.

http://www.nerc.com/filez/standards/EOP_VSLs_Project_2008-08.html

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
E-mail:	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities
	<input type="checkbox"/> Not Applicable

**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
(Project 2008-08)**

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

Background Information:

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1. VSLs should not have the unintended consequence of lowering the current level of compliance (what was specified in any prior Levels of Non-compliance)
2. VSLs should ensure uniformity and consistency in the determination of penalties
 - a. Be consistent — “Binary” VSLs must be Severe
 - b. Don’t use ambiguous language such as “minor” or “significant” to describe noncompliant performance
3. VSLs should not expand on what is required in the requirement.
4. VSLs should be based on a single violation, not an a cumulative number of violations

In addition, several stakeholders suggested making modifications to all of the VSLs associated with requirements that include subrequirements to avoid double jeopardy. The drafting team considered FERC’s guidelines and stakeholder comments and modified the VSLs as follows:

1. Where there was a VSL that included generic language, either the generic language was replaced with specific language, or the VSL was removed.
2. Where FERC directed NERC to modify a specific VSL, the drafting team has provided the FERC-directed VSL and its own proposed VSL. In some cases, there are minor modifications to the FERC-directed VSLs, but in all situations the drafting team agreed that the FERC-directed VSLs were an improvement over the originally proposed VSLs.
3. Where there was a requirement that contained multiple subrequirements – and each subrequirement described a distinct task or activity, then the drafting team assigned a set of VSLs to each of the separate subrequirements. If such a requirement were written today, the requirement would be separated into individual requirements without separate subrequirements.
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5. Note that the drafting team reviewed each subrequirement to ascertain the impact of a violation of that subrequirement in meeting the intent of the requirement. There are some situations where the subrequirements are all of equal or almost equal weight in contribution to the intent of the requirement this is reflected in the revised set of VSLs. Where subrequirements are of “unequal” weight in contributing to the intent of the requirement this is reflected in the revised VSLs.

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

2. Please review the proposed VLS for EOP-002-2 Capacity and Energy Emergencies. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R3 The suggested changes reflect total failure of the requirement if the responsible entity fails to fulfill both parts – communicating to the BAs AND to the RCs.			The Balancing Authority experienced an operating capacity or energy emergency and failed to communicate its current and future system conditions to its neighboring Balancing Authorities or its Reliability Coordinator.	The Balancing Authority experienced an operating capacity or energy emergency and failed to communicate its current and future system conditions to its neighboring Balancing Authorities and its Reliability Coordinator.

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Comments:

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Dan Rochester
Organization:	Independent Electricity System Operator
Telephone:	905-855-6363
E-mail:	dan.rochester@ieso.ca
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
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You do not have to answer all questions.

If you need to add a row to the tables below please select "Table" from the MS Word toolbar than select "Insert" then select "Row Above" or "Row Below"

1. Please review the proposed VLS for EOP-001-0 Emergency Operations Planning. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R3	Having VSLs assigned to both the main requirement and its subrequirements will subject an entity to double jeopardy. Propose to either assign VSLs to R3 based on violation of its subrequirement as proposed in the VSL set and remove the VSLs for the 4 sub-requirements (i.e., roll-up), or remove the VSLs for R3.	Ditto	Ditto	Ditto
R4	OK	OK	OK	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans are missing two (2) or more of the sub-requirements identified for R4.

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R3 The suggested changes reflect total failure of the requirement if the responsible entity fails to fulfill both parts – communicating to the BAS AND to the RCs.			The Balancing Authority experienced an operating capacity or energy emergency and failed to communicate its current and future system conditions to its neighboring Balancing Authorities or its Reliability Coordinator.	The Balancing Authority experienced an operating capacity or energy emergency and failed to communicate its current and future system conditions to its neighboring Balancing Authorities and its Reliability Coordinator.

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Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language

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3. Please review the proposed VLS for EOP-003-1 Load Shedding Plans. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R3	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting 5% or less of its required entities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting between more than 5% but not more than 5- 10% of its required entities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting more than 10% but not more than 15%, inclusive, of its required entities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting more than 15% of its required entities.
R6	Not sure what “Original R6” means here.			Please check if the “No changes” is correct since the original Severe is now N/A.
R7	Please check for consistency of the % threshold among requirements and standards. Some use up to a certain percent which includes equal to that percentage, others use less than that percentage. For example, under High, R7 says “less than 15% but R3 says 10-15%, inclusive.	Ditto	Ditto	Ditto
R8	OK	OK	The responsible entity has <u>had</u> plans for manual load shedding but did not have the capability to implement	OK

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Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
			the load shedding, as directed by the requirement.	

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4. Please review the proposed VLS for EOP-004-1 Disturbance reporting. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R2	OK	OK	OK	The responsible entity failed to promptly analyze <u>more than 15%</u> or more of its disturbances on the BES.
R3 No need to use bullets for the 2 conditions			The responsible entity experienced a reportable incident and failed to provide a preliminary written report to <u>either the RRO or NERC</u> one of the following: <ul style="list-style-type: none"> • RRO • NERC 	The responsible entity experienced a reportable incident and failed to provide a preliminary written report as directed by the requirement to both <u>the RRO and NERC</u> of the following: <ul style="list-style-type: none"> RRO NERC
R5				The Regional Reliability Organization <u>did</u> has not review ed the final report recommendations <u>at least twice each year</u> or did not notify the NERC Planning and Operating Committees that the recommendations were not being acted upon.

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Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language

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7. Please review the proposed VLS for EOP-008-1 Plans for Loss of Control Center Functionality. Then in the following table, please provide alternate language for any VSLs that you disagree with.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R1	OK	OK	OK	<p>The Generator Operator failed to test more than 15% or more of the required blackstart units.</p> <p>OR</p> <p>The Generator Operator's testing records for Requirement R1 are missing 15% or more of the required information.</p>
R2	The previous condition for failure to provide the documentation requested to NERC disappeared. Should it be retained.			

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Comments: We commend the DT for responding to industry comments on the last posting. This combined with FERC's guideline has resulted in much improved VSLs for these standards despite the standards as written do not lend themselves to facilitate effective VSL development.

Some attention needs to be paid to achieving consistency in the language and cut-off percentages used in the graded VSLs in this posting, as well as postings for other standards that will be reviewed in future.

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization: Bonneville Power Administration	
Telephone:	
E-mail:	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	X 1 — Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name: Bonneville Power Administration
Lead Contact: Denise Koehn
Contact Organization: BPA Transmission Reliability Program
Contact Segment: 1, 3, 5, 6
Contact Telephone: 360-418-2533
Contact E-mail: dekoehn@bpa.gov

Additional Member Name	Additional Member Organization	Region*	Segment*
Robin Chung	Generation Support	WECC	3,5 6
James Burns	Transmission Technical Operations	WECC	1

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Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R6				Severe VSL seems extreme for not conducting an annual review of an existing plan.
R7	Remove the lower VSL (bad wording) Everything is appropriate why would there be a violation?			

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5. Please review the proposed VLS for EOP-005-1 System Restoration Plans. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

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R1	5% doesn't work for 9 elements in the attachment $0.05 * 9 = 0.45$ (that's less than one element missing so there is a violation.) Would be better to say element #s. Also elements only applies if applicable.			
R11	add as applicable to subrequirements (some places may not have a nuclear generator?)			

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Comments: For the most part, the EOP VSLs have added clarity from the last version. Unfortunately, in this version, there is a clear trend of the VSLs having a lower threshold for non-compliance. Many of the percentage levels for graduated low to severe levels have effectively been lowered. This means it will take less to end up in the "severe" category. Additionally, many requirements have one VSL, for when you comply with the requirement or you don't, and almost all instances of when you don't comply have been moved to the "severe" column. The increase in severity seems unnecessary to have compliance.

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Individual Commenter Information	
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Name:	Ed Davis
Organization:	Entergy Services
Telephone:	504-576-3029
E-mail:	edavis@entergy.com
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1. Please review the proposed VLS for EOP-001-0 Emergency Operations Planning. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R1		The Balancing Authority demonstrated the existence of an operating agreement(s) with at least one adjacent Balancing Authority . . .		The Balancing Authority did not demonstrate the existence of any operating agreements that include provisions for emergency assistance with adjacent Balancing Authorities.
R6				The Transmission Operator or Balancing Authority failed to provide evidence that it completed an annual review and updated each of its emergency plans appropriately. OR No changes.
R7	The Transmission Operator	The Transmission Operator	The Transmission Operator	The Transmission Operator

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
	or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in R7.4 was not included.	or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in R7.3 was not included.	or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in either R7.1 or R7.2 was not included.	or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in tow (2) or more of the sub-requirements was not included.

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

2. Please review the proposed VLS for EOP-002-2 Capacity and Energy Emergencies. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R6			Insert a comma after R6.1.	Insert a comma after R6.1.
R7			Remove comma before both “or”’s and the extra space after the first “or”.	Remove commas before both “or”’s.
R8				No change suggested. OR ... act to mitigate the emergency condition by requesting emergency assistance when an emergency assistance request was required.
R9.1				... failed to request its Reliability Coordinator initiate an Energy Emergency Alert ...

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

3. Please review the proposed VLS for EOP-003-1 Load Shedding Plans. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R3	The responsible entity did not coordinate load shedding plans affecting 5% or less of its required entities, as directed by the requirement.	The responsible entity did not coordinate load shedding plans affecting between 5-10% of its required entities, as directed by the requirement.	The responsible entity did not coordinate load shedding plans affecting between 10-15% inclusive of its required entities, as directed by the requirement.	The responsible entity did not coordinate load shedding plans affecting more than 15% of its required entities, as directed by the requirement.
R7	The responsible entity did not coordinate automatic load shedding with 5% or less of its required entities by utilizing the types of automatic actions described in the requirement.	The responsible entity did not coordinate automatic load shedding with more than 5% but less than 10% of its required entities by utilizing the types of automatic actions described in the requirement.	The responsible entity did not coordinate automatic load shedding with 10% or more but less than 15% of its required entities by utilizing the types of automatic actions described in the requirement.	The responsible entity did not coordinate automatic load shedding with 15% or more of its required entities by utilizing the types of automatic actions described in the requirement.

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

4. Please review the proposed VLS for EOP-004-1 Disturbance reporting. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R2		The responsible entity failed to promptly analyze more than 5% but less than 10% of its disturbances on the BES.	The responsible entity failed to promptly analyze 10% or more but less than 15% of its disturbances on the BES.	
R3.1	The responsible entity submitted the report as required in R3.1 more than 24 but less than or equal to 36 hours after the disturbance or unusual occurrence or the discovery of the disturbance or unusual occurrence.	The responsible entity submitted the report as required in R3.1 more than 36 but less than or equal to 48 hours after the disturbance or unusual occurrence or the discovery of the disturbance or unusual occurrence.	The responsible entity submitted the report as required in R3.1 more than 48 but less than or equal to 72 hours after the disturbance or unusual occurrence or the discovery of the disturbance or unusual occurrence.	The responsible entity submitted the report as required in R3.1 72 hours or more after the disturbance or unusual occurrence or the discovery of the disturbance or unusual occurrence.

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

5. Please review the proposed VLS for EOP-005-1 System Restoration Plans. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R4	Change “Requirement” to “requirement”.	Change “Requirement” to “requirement”.	Change “Requirement” to “requirement”. Remove comma.	Change “Requirement” to “requirement”.
R6		Remove comma.		
R7				Remove “by”.
R10	Replace comma with period at end of statement.	Remove commas after “more”, after “demonstrate” and after “testing”.	Remove commas after “more”, after “demonstrate” and after “testing”.	Remove commas after “demonstrate” and after “testing”.
R11	. . . 75% or more but less than 100% of sub-requirements 50% or more but less than 75% of sub-requirements of sub-requirements of sub-requirements . . .

**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
(Project 2008-08)**

- 9. If you have any other comments on the proposed VSLs for the EOP standards that you haven't covered in your recommendations above, please provide them here.**

Comments: Several of the VSLs use percentages for measurement. Regardless of which format is used to represent these percentages (i.e., "5% or greater but less than 10%", "from 5% up to 10%", etc.), the same format should be used throughout all of the EOP Standards.

Official Comment Form for Draft 2 of the VSLs for the Emergency Operations Standards

Please use this form to submit comments on the proposed Violation Severity Levels (VSLs) for the Emergency Operations series of standards.

Comments must be submitted by May 8, 2009. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "EOP VSLs" in the subject line. If you have any questions on the subject information please contact Al Calafiore at Al.Calafiore@nerc.net.

http://www.nerc.com/filez/standards/EOP_VSLs_Project_2008-08.html

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
E-mail:	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT <input type="checkbox"/> FRCC <input type="checkbox"/> MRO <input type="checkbox"/> NPCC <input type="checkbox"/> RFC <input type="checkbox"/> SERC <input type="checkbox"/> SPP <input type="checkbox"/> WECC <input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 1 — Transmission Owners
	<input type="checkbox"/> 2 — RTOs and ISOs
	<input type="checkbox"/> 3 — Load-serving Entities
	<input type="checkbox"/> 4 — Transmission-dependent Utilities
	<input type="checkbox"/> 5 — Electric Generators
	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
	<input type="checkbox"/> 7 — Large Electricity End Users
	<input type="checkbox"/> 8 — Small Electricity End Users
	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities
<input type="checkbox"/> Not Applicable	

**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
(Project 2008-08)**

Group Comments (Complete this page if comments are from a group.)			
Group Name:	Northeast Power Coordinating Council		
Lead Contact:	Guy Zito		
Contact Organization:	Northeast Power Coordinating Council		
Contact Segment:	10		
Contact Telephone:	212-840-1070		
Contact E-mail:	gzito@npcc.org		
Additional Member Name	Additional Member Organization	Region*	Segment*
Ralph Rufrano	New York Power Authority	NPCC	5
Al Adamson	New York State Reliability Council	NPCC	10
Greg Campoli	New York Independent System Operator	NPCC	2
Roger Champagne	Hydro-Quebec TransEnergie	NPCC	2
Kurtis Chong	Independent Electricity System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Manuel Couto	National Grid	NPCC	1
Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1
Brian Evans-Mongeon	Utility Services	NPCC	8
Mike Garton	Dominion Resources Services, Inc.	NPCC	5
Michael Gildea	Constellation Energy	NPCC	6
Brian Gooder	Ontario Power Generation Incorporated	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2
David Kiguel	Hydro One Networks Inc.	NPCC	1
Michael Lombardi	Northeast Utilities	NPCC	1
Randy MacDonald	New Brunswick System Operator	NPCC	2
Bruce Metruck	New York Power Authority	NPCC	6
Robert Pellegrini	The United Illuminating Company	NPCC	1
Michael Schiavone	National Grid	NPCC	1
Michael Sonnelitter	FPL/NextEra Energy	NPCC	5
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10

**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
(Project 2008-08)**

Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

Background Information:

The Emergency Operations Violation Severity Level Drafting Team (EOP VSL DT) was formed to revise the set of EOP VSLs that was not approved by its ballot pool. The EOP VSL DT posted a set of proposed changes to the EOP VSLs for stakeholder comment early in 2008. Following that posting, FERC issued a Violation Severity Level Order that identified the following guidelines FERC is using to determine whether to approve VSLs:

1. VSLs should not have the unintended consequence of lowering the current level of compliance (what was specified in any prior Levels of Non-compliance)
2. VSLs should ensure uniformity and consistency in the determination of penalties
 - a. Be consistent — “Binary” VSLs must be Severe
 - b. Don’t use ambiguous language such as “minor” or “significant” to describe noncompliant performance
3. VSLs should not expand on what is required in the requirement.
4. VSLs should be based on a single violation, not an a cumulative number of violations

In addition, several stakeholders suggested making modifications to all of the VSLs associated with requirements that include subrequirements to avoid double jeopardy. The drafting team considered FERC’s guidelines and stakeholder comments and modified the VSLs as follows:

1. Where there was a VSL that included generic language, either the generic language was replaced with specific language, or the VSL was removed.
2. Where FERC directed NERC to modify a specific VSL, the drafting team has provided the FERC-directed VSL and its own proposed VSL. In some cases, there are minor modifications to the FERC-directed VSLs, but in all situations the drafting team agreed that the FERC-directed VSLs were an improvement over the originally proposed VSLs.
3. Where there was a requirement that contained multiple subrequirements – and each subrequirement described a distinct task or activity, then the drafting team assigned a set of VSLs to each of the separate subrequirements. If such a requirement were written today, the requirement would be separated into individual requirements without separate subrequirements.
4. Where there was a requirement that contained multiple subrequirements, and each subrequirement contributed to achieving the main requirement, then the subrequirements were “rolled up” into the main requirement and a single set of VSLs that address the “total” requirement was developed. The single set of VSLs references each of the subrequirements so that if an entity is noncompliant with a specific subrequirement, there is an associated VSL for that noncompliant performance.
5. Note that the drafting team reviewed each subrequirement to ascertain the impact of a violation of that subrequirement in meeting the intent of the requirement. There are some situations where the subrequirements are all of equal or almost equal weight in contribution to the intent of the requirement this is reflected in the revised set of VSLs. Where subrequirements are of “unequal” weight in contributing to the intent of the requirement this is reflected in the revised VSLs.

**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
(Project 2008-08)**

- 9. If you have any other comments on the proposed VSLs for the EOP standards that you haven't covered in your recommendations above, please provide them here.**

Comments: NPCC has no comments.

Official Comment Form for Draft 2 of the VSLs for the Emergency Operations Standards

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http://www.nerc.com/filez/standards/EOP_VSLs_Project_2008-08.html

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Jalal Babik
Organization:	Dominion Resources Inc.
Telephone:	(804) 273 4109
E-mail:	jalal.babik@dom.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/> 3 — Load-serving Entities
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<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/> 5 — Electric Generators
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**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
(Project 2008-08)**

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Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

Background Information:

The Emergency Operations Violation Severity Level Drafting Team (EOP VSL DT) was formed to revise the set of EOP VSLs that was not approved by its ballot pool. The EOP VSL DT posted a set of proposed changes to the EOP VSLs for stakeholder comment early in 2008. Following that posting, FERC issued a Violation Severity Level Order that identified the following guidelines FERC is using to determine whether to approve VSLs:

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4. VSLs should be based on a single violation, not an a cumulative number of violations

In addition, several stakeholders suggested making modifications to all of the VSLs associated with requirements that include subrequirements to avoid double jeopardy. The drafting team considered FERC’s guidelines and stakeholder comments and modified the VSLs as follows:

1. Where there was a VSL that included generic language, either the generic language was replaced with specific language, or the VSL was removed.
2. Where FERC directed NERC to modify a specific VSL, the drafting team has provided the FERC-directed VSL and its own proposed VSL. In some cases, there are minor modifications to the FERC-directed VSLs, but in all situations the drafting team agreed that the FERC-directed VSLs were an improvement over the originally proposed VSLs.
3. Where there was a requirement that contained multiple subrequirements – and each subrequirement described a distinct task or activity, then the drafting team assigned a set of VSLs to each of the separate subrequirements. If such a requirement were written today, the requirement would be separated into individual requirements without separate subrequirements.
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5. Note that the drafting team reviewed each subrequirement to ascertain the impact of a violation of that subrequirement in meeting the intent of the requirement. There are some situations where the subrequirements are all of equal or almost equal weight in contribution to the intent of the requirement this is reflected in the revised set of VSLs. Where subrequirements are of “unequal” weight in contributing to the intent of the requirement this is reflected in the revised VSLs.

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

2. Please review the proposed VLS for EOP-002-2 Capacity and Energy Emergencies. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

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R8		<p>A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert Level 1 as detailed in Attachment 1-EOP-002-0 “Energy Emergency Alert Levels.”</p> <p>Note: Reduce to Moderate Level 1 does not require a high VSL</p>		
R9.1-9.4	Should be rolled into R9	Should be rolled into R9	Should be rolled into R9	Should be rolled into R9

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language

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**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
(Project 2008-08)**

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Comments:

EOP-003@R4 – Disagree with FERC directive. FERC uses escalating scales in what appears to be random fashion throughout the EOP standards. The impact on reliability is no worse in this requirement than in requirement 7. There FERC used an escalating scale.

EOP-009 @ R1 only requires test records to include “the dates of the tests, the duration of the tests, and an indication of whether the tests met Regional BCP requirements” This is 3 items. How does one break that into 5% increments?

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http://www.nerc.com/filez/standards/EOP_VSLs_Project_2008-08.html

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
E-mail:	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
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**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
(Project 2008-08)**

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

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4. VSLs should be based on a single violation, not an a cumulative number of violations

In addition, several stakeholders suggested making modifications to all of the VSLs associated with requirements that include subrequirements to avoid double jeopardy. The drafting team considered FERC’s guidelines and stakeholder comments and modified the VSLs as follows:

1. Where there was a VSL that included generic language, either the generic language was replaced with specific language, or the VSL was removed.
2. Where FERC directed NERC to modify a specific VSL, the drafting team has provided the FERC-directed VSL and its own proposed VSL. In some cases, there are minor modifications to the FERC-directed VSLs, but in all situations the drafting team agreed that the FERC-directed VSLs were an improvement over the originally proposed VSLs.
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5. Note that the drafting team reviewed each subrequirement to ascertain the impact of a violation of that subrequirement in meeting the intent of the requirement. There are some situations where the subrequirements are all of equal or almost equal weight in contribution to the intent of the requirement this is reflected in the revised set of VSLs. Where subrequirements are of “unequal” weight in contributing to the intent of the requirement this is reflected in the revised VSLs.

You do not have to answer all questions.

If you need to add a row to the tables below please select "Table" from the MS Word toolbar than select "Insert" then select "Row Above" or "Row Below"

1. Please review the proposed VLS for EOP-001-0 Emergency Operations Planning. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Comments:

R1/Moderate VSL -- It is our opinion that the present proposed language for the Moderate VSL should set a "two agreement" minimum for adjacent Balancing Authority operating agreements instead of "one agreement." The reasoning is that if the adjacent Balancing Authority in the agreement cannot supply emergency assistance to the requesting Balancing Authority, it is possible that the remote Balancing Authority in that same agreement may be supplying (or will be supplying) assistance to the adjacent Balancing Authority. We recommend that the VSL utilize the "... at least two adjacent ..." language to establish at least two unique paths for supplying emergency assistance to any Balancing Authority requesting assistance. A caveat is introduced for those Balancing Authorities that are radially connected to another Balancing Authority.

R3/All VSLs -- The VSL's for Requirement 3 should either be deleted or the VSLs for the sub-requirements should be rolled up into a set of VSLs for Requirement 3 and the VSLs for the sub-requirements deleted. As this double jeopardy situation exists, any violation of one or more of the sub-requirements also results in a violation of Requirement 3.

R4/Standard -- While not within the scope of this comment posting, we find the phrasing "Staffing levels" of R4.4 to be ambiguous and unclear.

R7.2/Standard – Again not within the scope of this comment posting but we find the phrasing, "... arrange *new interchange agreements* ..." (our emphasis), to be non-conforming with the Functional Model and overly prescriptive. The words "new interchange" should be deleted from the sub-requirement – at some point.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R1		The Balancing Authority demonstrated the existence of an operating agreement with at least two adjacent Balancing Authorities, one adjacent Balancing Authority if only one exists,		

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
		for emergency assistance, but the agreement did not include provision for obtaining emergency assistance from any remote Balancing Authority.		

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

2. Please review the proposed VLS for EOP-002-2 Capacity and Energy Emergencies. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Comments:

R6/All VSL's – Requirement 6 of the standard states, "... These remedies include, but are not limited to:" (our emphasis) which allows for additional remedies not listed. The VSLs, as written, invoke bounds not contained in the standard by placing a Balancing Authority in violation of the standard should it not inclusively invoke one of the six sub-requirements.

R7/Standard and VSLs -- Again, we understand the standard is not the subject of this posting but we find Requirements 6 and 7 very mis-directed and that it needlessly sets up multiple double jeopardy situations. BAL-001 and BAL-002 address Control Performance and Disturbance Control, respectively, and should be deleted from this standard. CPS and DCS requirements in this standard and in BAL-001 and BAL-002 create a double jeopardy situation. One of the other double jeopardy situations created is in the use of the same requirement multiple times within the same standard; for example, the use of shedding firm load in R6.6 and also in R7.1. The VSL Drafting Team can minimize these double jeopardy scenarios by identifying areas where double jeopardy is in play and set the VSL to "N/A" for the requirement which creates the double jeopardy condition.

R9.2, R9.3 and R9.4/VSL – Binary or not, it defies logic that the failure (1) to submit a report to NERC for posting on its website or (2) the failure to use EEA-1 or EEA-2 to announce the change of priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7 is anything but a Lower category VSL.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R9.2	The Reliability Coordinator failed submit the report to NERC for posting on the NERC Website, noting the expected total MW that may have its transmission service priority changed.			
R9.3	The Reliability Coordinator failed to use EEA 1 to forecast the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.			

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language

**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
(Project 2008-08)**

- 9. If you have any other comments on the proposed VSLs for the EOP standards that you haven't covered in your recommendations above, please provide them here.**

Comments: Southern Company appreciates the difficult work performed by the Emergency Operations Planning Violation Severity Levels Drafting Team in this second draft of proposed Violation Severity Levels.

Official Comment Form for Draft 2 of the VSLs for the Emergency Operations Standards

Please use this form to submit comments on the proposed Violation Severity Levels (VSLs) for the Emergency Operations series of standards.

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http://www.nerc.com/filez/standards/EOP_VSLs_Project_2008-08.html

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
E-mail:	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT <input type="checkbox"/> FRCC <input type="checkbox"/> MRO <input type="checkbox"/> NPCC <input type="checkbox"/> RFC <input type="checkbox"/> SERC <input type="checkbox"/> SPP <input type="checkbox"/> WECC <input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 1 — Transmission Owners
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	<input type="checkbox"/> Not Applicable

**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
(Project 2008-08)**

Group Comments (Complete this page if comments are from a group.)
Group Name: SERC OC Standards Review Group
Lead Contact: Jim Case
Contact Organization: Entergy, Inc.
Contact Segment: 1,3,5
Contact Telephone: 601-594-6736
Contact E-mail: jcase@entergy.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Gerald Beckerle	Ameren	SERC	1,3,5
John Rembold	SIPC	SERC	1,3,5
Travis Sykes	TVA	SERC	1,3,5,9
Alan Jones	Alcoa	SERC	1,3,5
Eugene Warnecke	Ameren	SERC	1,3,5
Paul Turner	GASOC	SERC	3
Tom Sims	Southern	SERC	1,3,5
Brad Young	E.ON US	SERC	1,3,5
Gary Hutson	SMEPA	SERC	1,3,5
Steve Fritz	ACES Power	SERC	6
David McRee	Duke	SERC	1,3,5
Marc Butts	Southern	SERC	1,3,5
Tim Hattaway	PowerSouth	SERC	1,5
J.T. Wood	Southern	SERC	1,3,5
Vicky Budreau	Santee Cooper	SERC	1,3,9
Robert Thomasson	BREC	SERC	1,3,5

**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
(Project 2008-08)**

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Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

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 - b. Don’t use ambiguous language such as “minor” or “significant” to describe noncompliant performance
3. VSLs should not expand on what is required in the requirement.
4. VSLs should be based on a single violation, not an a cumulative number of violations

In addition, several stakeholders suggested making modifications to all of the VSLs associated with requirements that include subrequirements to avoid double jeopardy. The drafting team considered FERC’s guidelines and stakeholder comments and modified the VSLs as follows:

1. Where there was a VSL that included generic language, either the generic language was replaced with specific language, or the VSL was removed.
2. Where FERC directed NERC to modify a specific VSL, the drafting team has provided the FERC-directed VSL and its own proposed VSL. In some cases, there are minor modifications to the FERC-directed VSLs, but in all situations the drafting team agreed that the FERC-directed VSLs were an improvement over the originally proposed VSLs.
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4. Where there was a requirement that contained multiple subrequirements, and each subrequirement contributed to achieving the main requirement, then the subrequirements were “rolled up” into the main requirement and a single set of VSLs that address the “total” requirement was developed. The single set of VSLs references each of the subrequirements so that if an entity is noncompliant with a specific subrequirement, there is an associated VSL for that noncompliant performance.
5. Note that the drafting team reviewed each subrequirement to ascertain the impact of a violation of that subrequirement in meeting the intent of the requirement. There are some situations where the subrequirements are all of equal or almost equal weight in contribution to the intent of the requirement this is reflected in the revised set of VSLs. Where subrequirements are of “unequal” weight in contributing to the intent of the requirement this is reflected in the revised VSLs.

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

2. Please review the proposed VLS for EOP-002-2 Capacity and Energy Emergencies. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
<p>R5 This is a compound requirement. Our suggestion recognizes the relative failure to comply with the two portions of the standard</p>		<p>The Balancing Authority used the assistance provided by the Interconnection’s frequency bias for more time than needed to implement corrective actions.</p>	<p>The Balancing Authority unilaterally adjusted generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.</p>	<p>The Balancing Authority used the assistance provided by the Interconnection’s frequency bias for more time than needed to implement corrective actions. AND The Balancing Authority unilaterally adjusted generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.</p>
<p>R8</p>		<p>A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert</p>	<p>A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert</p>	<p>A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing an actual Energy Emergency and the Reliability Coordinator did not act to mitigate the emergency condition by</p>

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
		<p>Level 1 as detailed in Attachment 1-EOP-002-0 “Energy Emergency Alert Levels.”</p>	<p>Level 2 or 3 as detailed in Attachment 1-EOP-002-0 “Energy Emergency Alert Levels.”</p>	<p>requesting emergency assistance when this was required.</p>
R9.2				<p>Comment: This requirement is the clearest evidence yet that all binary requirements should not be severe</p>
R9.3				<p>Comment: This is another requirement with clear evidence that all binary requirements should not be severe</p>

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

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Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language

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Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

8. Please review the proposed VLS for EOP-009-1 Documentation of Backstart Generating Unit Test Results. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the standard number and requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
<p>R1 - comment</p> <p>The “or” comment in moderate high and severe should be removed – R1 does not require test documentation. Even if documentation is considered in the VSL level, lack of documentation is not as severe as lack of testing.</p>	<p>The Generator Operator’s testing records for Requirement R1 are missing up to 5% of the required information.</p>	<p>The Generator Operator failed to test 5% or more but less than 10% of the required blackstart units.</p>	<p>The Generator Operator failed to test 10% or more but less than 15% of the required blackstart units</p>	<p>The Generator Operator failed to test more than 15% or more of the required blackstart units.</p>

**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
(Project 2008-08)**

- 9. If you have any other comments on the proposed VSLs for the EOP standards that you haven't covered in your recommendations above, please provide them here.**

Comments:

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http://www.nerc.com/filez/standards/EOP_VSLs_Project_2008-08.html

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Luke Weber
Organization:	We Energies
Telephone:	262-544-7393
E-mail:	luke.weber@we-energies.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
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**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
(Project 2008-08)**

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Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

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Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

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R7				<p>The Balancing Authority exhausted the steps listed in R6, or the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirements R7.1.</p> <p>AND</p> <p>The Balancing Authority exhausted the steps listed in R6, or the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirement R7.2.</p>

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language

**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
(Project 2008-08)**

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Comments:

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NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
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**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
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Comments: The MRO NSRS commends the EOP VSL drafting team on their efforts with the EOP VSLs.

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Sandra Shaffer
Organization:	PacifiCorp
Telephone:	503.813.5219
E-mail:	sandra.shaffer@pacificorp.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT <input type="checkbox"/> FRCC <input type="checkbox"/> MRO <input type="checkbox"/> NPCC <input type="checkbox"/> RFC <input type="checkbox"/> SERC <input type="checkbox"/> SPP <input checked="" type="checkbox"/> WECC <input type="checkbox"/> NA – Not Applicable	<input checked="" type="checkbox"/> 1 — Transmission Owners <input type="checkbox"/>
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You do not have to answer all questions.

If you need to add a row to the tables below please select "Table" from the MS Word toolbar than select "Insert" then select "Row Above" or "Row Below"

1. Please review the proposed VLS for EOP-001-0 Emergency Operations Planning. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R4, R6, R7			<p>For a number of the requirements (R4, R6, R7), PacifiCorp notes that the general trend is to increase the level of severity, and in a number of cases the eliminate a "Lower" VSL. PacifiCorp reiterates its position that some of the requirements remain ambiguous and that simply increasing the severity levels for unclear requirements will not improve reliability to the BES. If Responsible Entities do not know what constitutes compliance in the first place, more</p>	

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
			severe penalties do not provide any added incentive to be compliant.	

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

2. Please review the proposed VLS for EOP-002-2 Capacity and Energy Emergencies. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

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R6, R8, R9.4	<p>For a number of the requirements (R4, R6, R7), PacifiCorp notes that the general trend is to increase the level of severity, and in a number of cases the eliminate a "Lower" VSL. PacifiCorp reiterates its position that some of the requirements remain ambiguous and that simply increasing the severity levels for unclear requirements will not improve reliability to the BES. If Responsible Entities do not know what constitutes compliance in the first place, more severe penalties do not provide any added incentive to be compliant.</p>			

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

- 9. If you have any other comments on the proposed VSLs for the EOP standards that you haven't covered in your recommendations above, please provide them here.**

While PacifiCorp agrees that the approved standards development process should be used to modify the EOP VSLs (as opposed to NERC determining VSLs independently from the standards development process) because the VSLs are often de facto interpretations of the meaning of the standard requirements, PacifiCorp disagrees that there is a unique need for the EOP VSLs to be modified "as rapidly as practical." Revising the EOP VSLs as rapidly as possible seems inappropriate for a number of reasons. Many of the EOP standards remain ambiguous and unclear. Rapidly developing a VSL does not improve BES reliability if the requirement it is attached to is unclear and the Responsible Entity cannot determine whether it is complying with the language and intent of the requirement. All of the EOP standards are currently being rewritten and four of them are scheduled for retirement. The resources on both a national and local level consumed by this project could have been used to further the overall rewriting effort instead of rapidly developing VSLs on soon to be returned standards.

For a number of the requirements, PacifiCorp notes that the general trend is to increase the level of severity, and in a number of cases to eliminate a "Lower" VSL. PacifiCorp reiterates its position that some of the requirements remain ambiguous and that simply increasing the severity levels for unclear requirements will not improve reliability to the BES. If Responsible Entities do not know what constitutes compliance in the first place, more severe penalties do not provide any added incentive to be compliant.

Official Comment Form for Draft 2 of the VSLs for the Emergency Operations Standards

Please use this form to submit comments on the proposed Violation Severity Levels (VSLs) for the Emergency Operations series of standards.

Comments must be submitted by May 8, 2009. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "EOP VSLs" in the subject line. If you have any questions on the subject information please contact Al Calafiore at Al.Calafiore@nerc.net.

http://www.nerc.com/filez/standards/EOP_VSLs_Project_2008-08.html

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Wayne Pourciau
Organization:	Georgia System Operations Corp.
Telephone:	770-270-7118
E-mail:	wayne.pourciau@gasoc.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/> 3 — Load-serving Entities
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	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities
	<input type="checkbox"/> Not Applicable

**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
(Project 2008-08)**

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

Background Information:

The Emergency Operations Violation Severity Level Drafting Team (EOP VSL DT) was formed to revise the set of EOP VSLs that was not approved by its ballot pool. The EOP VSL DT posted a set of proposed changes to the EOP VSLs for stakeholder comment early in 2008. Following that posting, FERC issued a Violation Severity Level Order that identified the following guidelines FERC is using to determine whether to approve VSLs:

1. VSLs should not have the unintended consequence of lowering the current level of compliance (what was specified in any prior Levels of Non-compliance)
2. VSLs should ensure uniformity and consistency in the determination of penalties
 - a. Be consistent — “Binary” VSLs must be Severe
 - b. Don’t use ambiguous language such as “minor” or “significant” to describe noncompliant performance
3. VSLs should not expand on what is required in the requirement.
4. VSLs should be based on a single violation, not an a cumulative number of violations

In addition, several stakeholders suggested making modifications to all of the VSLs associated with requirements that include subrequirements to avoid double jeopardy. The drafting team considered FERC’s guidelines and stakeholder comments and modified the VSLs as follows:

1. Where there was a VSL that included generic language, either the generic language was replaced with specific language, or the VSL was removed.
2. Where FERC directed NERC to modify a specific VSL, the drafting team has provided the FERC-directed VSL and its own proposed VSL. In some cases, there are minor modifications to the FERC-directed VSLs, but in all situations the drafting team agreed that the FERC-directed VSLs were an improvement over the originally proposed VSLs.
3. Where there was a requirement that contained multiple subrequirements – and each subrequirement described a distinct task or activity, then the drafting team assigned a set of VSLs to each of the separate subrequirements. If such a requirement were written today, the requirement would be separated into individual requirements without separate subrequirements.
4. Where there was a requirement that contained multiple subrequirements, and each subrequirement contributed to achieving the main requirement, then the subrequirements were “rolled up” into the main requirement and a single set of VSLs that address the “total” requirement was developed. The single set of VSLs references each of the subrequirements so that if an entity is noncompliant with a specific subrequirement, there is an associated VSL for that noncompliant performance.
5. Note that the drafting team reviewed each subrequirement to ascertain the impact of a violation of that subrequirement in meeting the intent of the requirement. There are some situations where the subrequirements are all of equal or almost equal weight in contribution to the intent of the requirement this is reflected in the revised set of VSLs. Where subrequirements are of “unequal” weight in contributing to the intent of the requirement this is reflected in the revised VSLs.

You do not have to answer all questions.

If you need to add a row to the tables below please select "Table" from the MS Word toolbar than select "Insert" then select "Row Above" or "Row Below"

1. Please review the proposed VLS for EOP-001-0 Emergency Operations Planning. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R2	The Transmission Operator's emergency load reduction plan that is capable of being implemented within 30 minutes failed to include less than 25% of its identified IROLs	The Transmission Operator's emergency load reduction plan that is capable of being implemented within 30 minutes failed to include 25% or more but less than 50% of its identified IROLs	The Transmission Operator's emergency load reduction plan that is capable of being implemented within 30 minutes failed to include 50% or more but less than 75% of its identified IROLs	The Transmission Operator failed to demonstrate the existence of an emergency load reduction plan that is capable of being implemented within 30 minutes for all identified IROLs.
R3	N/A	N/A	N/A	N/A
R3.1	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity and the plans are maintained but the plans are not implemented.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity but the plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity.
R3.2	The Transmission Operator or Balancing Authority	The Transmission Operator or Balancing Authority	The Transmission Operator or Balancing Authority	The Transmission Operator or Balancing Authority

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Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
	demonstrated the existence of a set of plans to mitigate operating emergencies on the transmission system and the plans are implemented but the plans are not maintained.	demonstrated the existence of a set of plans to mitigate operating emergencies on the transmission system and the plans are maintained but the plans are not implemented.	demonstrated the existence of a set of plans to mitigate operating emergencies on the transmission system but the plans are neither maintained nor implemented.	failed to demonstrate the existence of a set of plans to mitigate operating emergencies on the transmission system.
R3.3	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for load shedding and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for load shedding and the plans are maintained but the plans are not implemented.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for load shedding but the plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans for load shedding.
R3.4	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for system restoration and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for system restoration and the plans are maintained but the plans are not implemented.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for system restoration but the plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans for system restoration.
R4	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans do not include 1 or more sub-requirement.	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans do not include 3 or more sub-requirement.	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans do not include any sub-requirement.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of emergency plans that will enable it to mitigate operating emergencies.
R4.1	N/A	N/A	N/A	N/A

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Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R4.2	N/A	N/A	N/A	N/A
R4.3	N/A	N/A	N/A	N/A
R4.4	N/A	N/A	N/A	N/A
R5	The Transmission Operator or Balancing Authority failed to include less than 25% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority failed to include 25% or more but less than 50% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority failed to include 50% or more but less than 75% of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.	The Transmission Operator or Balancing Authority failed to include 75% or more of the applicable elements in Attachment 1-EOP-001-0 in its emergency plan.
R6	The Transmission Operator or Balancing Authority failed to annually review and update less than 25% of its emergency plans and failed to provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.	The Transmission Operator or Balancing Authority failed to annually review and update 25% or more but less than 50% of its emergency plans and failed to provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.	The Transmission Operator or Balancing Authority failed to annually review and update 50% or more but less than 75% of its emergency plans and failed to provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.	The Transmission Operator or Balancing Authority failed to annually review and update 75% or more of its emergency plans and failed to provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.
R7	The Transmission Operator or Balancing Authority coordinated its emergency plans with other Transmission Operators and	The Transmission Operator or Balancing Authority coordinated its emergency plans with other Transmission Operators and	The Transmission Operator or Balancing Authority coordinated its emergency plans with other Transmission Operators and	The Transmission Operator or Balancing Authority failed to coordinate its emergency plans with other Transmission Operators and

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Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
	Balancing Authorities as appropriate but did not execute up to 2 of the applicable steps.	Balancing Authorities as appropriate but did not execute 3 of the applicable steps.	Balancing Authorities as appropriate but did not execute the any of the applicable steps.	Balancing Authorities as appropriate and to execute any of the applicable steps.

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2. Please review the proposed VLS for EOP-002-2 Capacity and Energy Emergencies. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R3	N/A	N/A	The Balancing Authority experienced an operating capacity or energy emergency but failed to communicate its current and future system conditions to either its Reliability Coordinator or its neighboring Balancing Authorities.	The Balancing Authority experienced an operating capacity or energy emergency and failed to communicate its current and future system conditions to its Reliability Coordinator and its neighboring Balancing Authorities.
R4.	N/A	The Balancing Authority anticipating an operating capacity or energy emergency to perform actions necessary but did not include less than half of the steps in R4	The Balancing Authority anticipating an operating capacity or energy emergency to perform actions necessary but did not include half or more of the steps in R4	The Balancing Authority anticipating an operating capacity or energy emergency failed to perform all actions necessary
R5.	N/A	N/A	The Balancing Authority used the assistance provided by the Interconnection's frequency bias for more time than needed to implement corrective actions. OR The Balancing Authority unilaterally adjusted generation in an attempt to	The Balancing Authority used the assistance provided by the Interconnection's frequency bias for more time than needed to implement corrective actions. AND The Balancing Authority unilaterally adjusted generation in an attempt to

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Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
			return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.	return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.
R6.	N/A	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to immediately implement less than half of the sub-requirements R6.1 R6.2, R6.3, R6.4, R6.5 or R6.6.	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to immediately implement half or more of the sub-requirements R6.1 R6.2, R6.3, R6.4, R6.5 or R6.6.	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to immediately implement all of sub-requirements R6.1 R6.2, R6.3, R6.4, R6.5 or R6.6.
R8.	N/A	A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert Level 1 as detailed in Attachment 1-EOP-002-0 “Energy Emergency Alert Levels.”	A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert Level 2 or 3 as detailed in Attachment 1-EOP-002-0 “Energy Emergency Alert Levels.”	A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate any Energy Emergency Alert as detailed in Attachment 1-EOP-002-0 “Energy Emergency Alert Levels.” OR A Reliability Coordinator had a Balancing Authority within its Reliability

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Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
				Coordinator area experiencing an actual Energy Emergency and the Reliability Coordinator did not act to mitigate the emergency condition by requesting emergency assistance when this was required.

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3. Please review the proposed VLS for EOP-003-1 Load Shedding Plans. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R3.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting less than 25% of its required entities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting 25% or more but less than 50% of its required entities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting 50% or more but less than 75% of its required entities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting more than 75% of its required entities.
R7.	The responsible entity did not coordinate automatic load shedding with less than 25% of the types of automatic actions described in the Requirement.	The responsible entity did not coordinate automatic load shedding with 25% or more but less than 50% of the types of automatic actions described in the Requirement.	The responsible entity did not coordinate automatic load shedding with 50% or more but less than 75% of the types of automatic actions described in the Requirement.	The responsible entity did not coordinate automatic load shedding with 75% or more of the types of automatic actions described in the Requirement.
R8.	N/A	The responsible entity did not have plans for operator controlled manual load shedding, as directed by the requirement but had the capability to implement manual load shedding.	The responsible entity has plans for manual load shedding but did not have the capability to implement the load shedding, as directed by the requirement.	The responsible entity did not have plans for operator controlled manual load shedding, as directed by the requirement nor had the capability to implement the load shedding, as directed by the requirement.

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5. Please review the proposed VLS for EOP-005-1 System Restoration Plans. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R1	The Transmission Operator has a restoration plan that is missing less than 25% of the applicable elements listed in Attachment 1-EOP-005.	The Transmission Operator has a restoration plan that is missing 25% or more but less than 50% of the applicable elements listed in Attachment 1-EOP-005.	The Transmission Operator has a restoration plan that is missing 50% or more but less than 75% of the applicable elements listed in Attachment 1-EOP-005.	The Transmission Operator has a restoration plan that is missing 75% or more of the applicable elements listed in Attachment 1-EOP-005.
R4	The Transmission Operator failed to coordinate its restoration plans with 25% or less of the entities identified in the Requirement.	The Transmission Operator failed to coordinate its restoration plans with more than 25% but less than 50% of the entities identified in the Requirement.	The Transmission Operator failed to coordinate its restoration plans with 50% or more, but less than 75% of the entities identified in the Requirement.	The Transmission Operator failed to coordinate its restoration plans with 75% or more of the entities identified in the Requirement.
R6	The Transmission Operator or Balancing Authority failed to train less than 25% of its operating personnel in the implementation of the restoration plan.	The Transmission Operator or Balancing Authority failed to train 25% or more, but less than 50 % of its operating personnel in the implementation of the restoration plan.	The Transmission Operator or Balancing Authority failed to train 50 % or more but less than 75% of its operating personnel in the implementation of the restoration plan.	The Transmission Operator or Balancing Authority failed to train 75% or more of its operating personnel in the implementation of the restoration plan.

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Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R9	The Transmission Operator failed to document the Cranking Paths, including initial switching requirements, between the blackstart generating unit and less than 25% of the unit(s) to be started.	The Transmission Operator failed to document the Cranking Paths, including initial switching requirements, between the blackstart generating unit and more than 25% but less than 50% of the unit(s) to be started.	The Transmission Operator failed to document the Cranking Paths, including initial switching requirements, between the blackstart generating unit and more than 50% but less than 75% of the unit(s) to be started.	The Transmission Operator failed to document the Cranking Paths, including initial switching requirements, between the blackstart generating unit and more than 75% of the unit(s) to be started.
R10 & 10.1 combined (VSLs for R10.1 set to N/A)	For less than 25% of the blackstart generating units in its restoration plan , the Transmission Operator failed to demonstrate, through simulation or testing at least once every five years, that these blackstart generating units can perform their intended functions as required in the regional restoration plan,	For 25% or more, but less than 50% of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate, through simulation or testing at least once every five years, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.	For 50% or more, but less than 75% of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate, through simulation or testing at least once every five years, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.	For 75% or more of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate, through simulation or testing at least once every five years, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.

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Comments:

Fifteen Percent

- VSLs are supposed to be 4 levels of violating a requirement from a small infraction to a huge infraction or somewhere in between.
- Missing all aspects of a requirement is a huge infraction and should be Severe.
- It is not a huge infraction to miss more than 15% but less than 25% of the aspects of a requirement and it should not be Severe. In fact, any violation that misses less than 25% of the aspects should be Lower.
- Moderate should be from 25% to 50% and High should be from 50% to 75%.
- Although 75% is not a complete violation, it could be made Severe to miss from 75% to 100% of the aspects of a requirement.
- These ranges truly reflect degrees of infraction and have nothing to do with risk or consequences as is appropriate. Ranges of only 5% seem to be based on some perceived degree of risk or consequences of the slightest infraction and not on degrees of violation.
- A severe violation of one requirement may not have the same risk or consequences as a severe violation of another requirement but they are both huge infractions.

Penalty Matrix

- The concept of violating a requirement at varying degrees does not apply to a binary violation. The original concept was based on the assumption that a violation could be determined to be a small infraction of the rule, a huge infraction, or somewhere in between.
- This assumption is not the case for many requirements. Some requirements are pass/fail requirements. These are called "binary" violations.
- A binary violation is not a small infraction. It is not a huge infraction. It has no level at all. It is just a violation.
- The 3x4 matrix was developed to implement the concept of violating requirements in degrees of severity. It does not apply to a binary violation which has no degrees of severity. The CMEP program should be modified to recognize violations with no degrees of severity.
- What may be appropriate is a 3x1 matrix (a column) for binary violations with a range of penalties for each level of risk (VRF). (Not for EOP VSL Drafting Team but for NERC procedures)

The third dimension

- With a 3x4 matrix for violations of varying degrees of severity and a 3x1 matrix for binary violations, there is still a factor that is missing. This factor is basically a third dimension to each matrix.
- This third dimension is the degree to which a given violation rises to the level of risk as expressed in the VRF.
- A High VRF for a requirement represents a worse case scenario. A violation of such a requirement is judged in the abstract to be a high risk to the integrity of the BES. The third dimension is a measure (or judgment) of how high "up the scale" to the worse case risk expressed in the VRF that the actual violation rose.

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- A BA with an L_{10} of 7.59 has a certain chance, when being outside of L_{10} , of affecting neighbors and putting the integrity of the BES at risk. A BA with an L_{10} of 278 MW has a different chance, when being outside of L_{10} , of affecting neighbors and putting the integrity of the BES at risk. There are degrees of rising to the level of risk as expressed in the VRF for a failure of CPS2 depending on the size of the L_{10} of the BA. One entity's CPS2 failure does not carry the same risk as another entity's failure. It does not rise as far up the scale to the level of risk represented by the VRF as another.
- Failing to meet NERC requirements when taking a 115 KV line out of service carries a different risk of affecting neighbors and putting the integrity of the BES at risk than failing to meet NERC requirements when taking a 500 KV line out of service. Violations for 115 KV lines do not rise as far up the scale to the level of risk represented by the VRF as violations for 500 KV lines.
- The CMEP program should be modified to recognize this third dimension.
- What may be an appropriate modification is to judge in each case the degree to which the violation in practice rises to the level of the VRF in the abstract. Such a judgment would likely involve some subjectivity but it would at least allow for better "making the punishment fit the crime."
(Not for EOP VSL Drafting Team but for NERC procedures)

Official Comment Form for Draft 2 of the VSLs for the Emergency Operations Standards

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http://www.nerc.com/filez/standards/EOP_VSLs_Project_2008-08.html

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	James H. Sorrels, Jr.
Organization:	American Electric Power
Telephone:	(614) 716-2370
E-mail:	jhsorrels@aep.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
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5. Note that the drafting team reviewed each subrequirement to ascertain the impact of a violation of that subrequirement in meeting the intent of the requirement. There are some situations where the subrequirements are all of equal or almost equal weight in contribution to the intent of the requirement this is reflected in the revised set of VSLs. Where subrequirements are of “unequal” weight in contributing to the intent of the requirement this is reflected in the revised VSLs.

Comment Form for Second Draft of VSLs for the Emergency Operations Standards (Project 2008-08)

2. Please review the proposed VLS for EOP-002-2 Capacity and Energy Emergencies. Then in the following table, please provide alternate language for any VSLs that you disagree with. Please be sure to identify the requirement number for each proposed revision.

Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language
R6	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to implement sufficient mitigating measures to correct the issue as defined in R6, once in a 3 year period.	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to implement sufficient mitigating measures to correct the issue as defined in R6, twice in a 3 year period.	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to implement sufficient mitigating measures as defined in R6 three times, in a 3 year period.	The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to immediately implement sufficient mitigating measures to correct the issue as defined in R6 four times, in a 3 year period, OR , The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to immediately implement sufficient mitigating measures as defined in R6 and caused external Balancing Authorities to intervene in an attempt to control interconnection collapse.

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Requirement Number	Alternate Lower VSL Language	Alternate Moderate VSL Language	Alternate High VSL Language	Alternate Severe VSL Language

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**Comment Form for Second Draft of VSLs for the Emergency Operations Standards
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- 9. If you have any other comments on the proposed VSLs for the EOP standards that you haven't covered in your recommendations above, please provide them here.**

Comments: