

Individual or group. (15 Responses)
Name (9 Responses)
Organization (9 Responses)
Group Name (6 Responses)
Lead Contact (6 Responses)
Contact Organization (6 Responses)
Question 1 (12 Responses)
Question 1 Comments (15 Responses)
Question 2 (10 Responses)
Question 2 Comments (15 Responses)
Question 3 (14 Responses)
Question 3 Comments (15 Responses)
Question 4 (8 Responses)
Question 4 Comments (15 Responses)
Question 5 (12 Responses)
Question 5 Comments (15 Responses)
Question 6 (12 Responses)
Question 6 Comments (15 Responses)
Question 7 (13 Responses)
Question 7 Comments (15 Responses)

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Individual
Joe Petaski
Manitoba Hydro
Yes
Yes
Yes
Yes
Yes
Yes
Individual
Scott Barfield-McGinnis
Georgia System Operations Corporation
No
This requirement has three actions (manage, alarm, test and/or actively monitor) and three potential categories of equipment (vital, emergency facilities, and emergency equipment - not used for routine communications). The VSL places the violation on the equipment categories which may create a situation of non-uniformity between entities (FERC guideline 2). For example, one entity may have "vital" and no facilities or equipment not used for routine communications. **A violation should be the result of failure to "manage, alarm, test and/or actively monitor" by category of equipment. Entities may have single or multiple sets of equipment and facilities. Therefore, the VSL should read: Moderate VSL: "The responsible entity failed ONE of the THREE requirements to "manage, alarm, test and/or actively monitor" a vital telecommunication facility, or emergency telecommunications facility and equipment not used for routine communications. High VSL: "The responsible entity failed TWO of the THREE requirements to "manage, alarm, test and/or actively monitor" a vital telecommunication facility, or emergency telecommunications facility and equipment not used for routine communications. Severe VSL: "The responsible entity failed all THREE requirements to

"manage, alarm, test and/or actively monitor" a vital telecommunication facility, or emergency telecommunications facility and equipment not used for routine communications. Grammatical error: The change in the "Server VSL" column has an additional comma added which changes the meaning of the requirement and statement. "The responsible entity failed to manage, alarm, test(,) and/or actively monitor...". The (,) needs to be removed to correct the statement. (FERC Guideline 3)
No
This VSL places a HIGH VSL on failure to notify the affected BAs and TOPs and a SERVER VSL on failure to notify the responsible entity's RC making this requirement almost binary (FERC Guideline 2). Recommend: Lower VSL: Leave blank Moderate VSL: Notified RC, but failed to notify one or more affected BAs OR one or more affected TOPs. High VSL: Notified RC, but failed to notify one or more affected BAs AND one or more affected TOPs. Severe VSL: Failed to notify the RC AND failed to notify one or more affected BAs AND one or more TOPs.
No
he second part of the Severe VSL following the "OR" is unnecessary. Consider removing. If needed, close the time interval in the first part.
Group
Northeast Power Coordinating Council
Guy Zito
Northeast Power Coordinating Council
Yes
No
In the Severe VSL insert "telecommunication facilities" after "vital" to improve sentence clarity. The High and Severe VSLs need to be clarified. We understand "emergency telecommunications facilities and equipment not used for routine communications" to be a subset of "vital telecommunications facilities". However as written, the VSLs seem to treat these "emergency telecommunications facilities" as separate from the "vital telecommunications facilities". If these emergency telecommunications facilities and equipment ARE considered vital, we suggest removing the High VSL, and in the Severe VSL, replacing "and" before "emergency telecommunications facilities" with "including".
No
Consistent with NERC's VSL Guidelines applied in the previous posting, the VSL of the sub-requirement should be incorporated into the VSL of the main requirement. Suggest the stated VSLs be "OR-ed" with the corresponding VSLs of the main requirement. For the High VSL, replace "all" with "at least one" and make consequential changes to avoid a problem if some but not all entities were notified. The text would read "failed to notify at least one other potentially affected Balancing Authority or Transmission Operator"
No
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No
For the Severe VSL, "or" should be replaced by "OR" to make it clear that what follows is a second part to the VSL and "contingency" (following "or") should be capitalized.
No
For the Severe VSL, replace "reducing" with "reduction of".
No
For the Lower VSL we suggest replacing "provided after the required time (but not more than one hour after the required time)" with "provided up to one hour after the required time" For the Moderate VSL we suggest the sentence structure "more than one hour and up to (and including) two hours after the required time." A similar structure is suggested for the High VSL.
Individual
John W Miller
Georgia Transmission Corporation
No
What constitutes a vital or emergency facility? Possible VSL levels-- Text requirement: ...shall manage (1), alarm (2), test and or actively monitor (3)..... Lower VSL: Responsible entity failed to perform any part of the requisits on one of its vital telecommunications circuits. Moderate VSL: Responsible entity failed to perform one of the requisites for all

Group
Bonneville Power Administration
Denise Koehn
BPA, Transmission Reliability Program
No
BAL-003-0-.1b - BPA believes that they should all be lower. Because the changes to Bias from year to year are very small, not meeting this requirement has very little to no affect on reliability of an interconnection.
No
BPA did not raise this concern with the concurrent ballot, but is raising our concern now. BPA does not believe that it is possible to monitor satellite phones, which are a common form of emergency communications. The word "vital" does not appear to be defined anywhere, so it is a little ambiguous, as is the term "special attention". There seems to be too much left to interpretation. This is a dangerous situation when combined with the higher violation severity levels. The language of the standard needs clarification to be auditable and for assessing violations.
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Yes
Yes
Yes
Yes
Group
Midwest ISO Standards Collaborators
Jason Marshall
Midwest ISO
Yes
No
To be consistent with NERC's August 10, 2009 informational filing regarding VSLs and VRFs, these VSLs should be rolled up to the main requirement. Furthermore, the Commission expressed in paragraph 27 of its June 19, 2008 Order on VSLs its desire for gradated VSLs where possible. Clearly, it is possible to establish Lower and Moderate VSLs based on the number of Balancing Authorities and Transmission Operators notified.
No
The original VSLs for the number of days missed were satisfactory and met FERC conditions because the requirement talks about reliability analyses which is plural. Thus, all analyses are to be considered in aggregate. To do otherwise would be equivalent to changing analyses to analysis in the requirement which would violate a FERC guideline 3. Furthermore, the Commission expressed in paragraph 27 of its June 19, 2008 Order on VSLs its desire for gradated VSLs where possible. Gradated VSLs could be written based on whether all SOLs, IROLs, contingencies, etc. are included in the analysis.
No
The proposed VSLs violates FERC guideline 3 as it changes the requirement. The requirement is written to consider all action plans in aggregate by using action plans in the plural form. Thus, considering each action a separate violation is equivalent to changing "action plans" to "action plan" in the requirement.
No
Based on the wording, exactly one hour, two hours and three hours are excluded from the VSLs. This is a gap that should be fixed.
Group
IRC Standards Review Committee

Al DiCaprio
PJM
Yes
No
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Individual
Si Truc PHAN
Hydro-Quebec TransEnergie (NCR07112)
Yes
Yes
Yes
Yes
Yes
Yes
Editorial must be consistent
Yes
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Individual
JC Culberson
ERCOT
Yes
Yes
Yes
No
The existing VSLs provide a means to gradate severity levels without compromising the intent of the requirement. The existing VSLs are not unreasonable and appear to comply with FERC's guidance to establish graduated VSLs. where

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Group
MRO's NERC Standards Review Subcommittee
Carol Gerou
Midwest Reliability Organization
Yes
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Individual
Dan Rochester
Independent Electricity System Operator
Yes
No
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Individual
Michael Gammon
Kansas City Power & Light
Yes
No
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Individual
Claudiu Cadar
GDS Associates, Inc
Yes
Suggest changing as in “Where transmission system transient overvoltage factors were not known, clearances were not derived from Table 5, IEEE 516-2003, phase-to-ground distances, nor the appropriate altitude correction factors were applied”.