



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Standards Announcement

Comment Period Open

August 2–September 16, 2010

Now available at: http://www.nerc.com/filez/standards/VSLs_Project_2007-23.html

Project 2007-23: Violation Severity Levels

NERC Staff, assisted by members of Violation Severity Level Drafting Teams, is seeking comments on the following documents **until 8 p.m. Eastern on September 16, 2010:**

- NERC Staff Proposed Violation Severity Levels (VSLs)
- Supplemental SAR for VSL Outliers

Instructions

Please use this comment form to submit comments. If you experience any difficulties in using the electronic form, please contact Lauren Koller at Lauren.Koller@nerc.net. An off-line, unofficial copy of the comment form is posted on the project page: http://www.nerc.com/filez/standards/VSLs_Project_2007-23.html

Next Steps

NERC staff, working with members of the VSL drafting teams, will draft and post responses to comments received during this period, and will make conforming changes to the VSLs in support of stakeholder comments that propose improvements and comply with both NERC's VSL guidelines and FERC's VSL guidelines.

Project Background

In its June 19, 2008 VSL Order, FERC directed NERC to review all Violation Severity Level assignments (with the exception of those for which the Commission directed specific modification) for compliance with Guidelines 2b, 3, and 4, and submit a compliance filing either validating the current Violation Severity Level assignments or proposing revision. A preliminary set of revised VSLs was balloted and filed with the Commission earlier this year; the VSLs posted for this comment period must be filed with the Commission in December, 2010. Here is a brief recap of the relevant FERC "Guidelines:"

- Guideline 2b — VSLs should not use ambiguous terms such as "minor" or "significant" to describe noncompliant performance.
- Guideline 3 — VSLs should be consistent with the corresponding requirement (VSLs should not expand on what is in the requirement).
- Guideline 4 — VSLs should be based on a single violation, not on a cumulative number of violations (unless stated otherwise in the requirement).

Here is a link to NERC's VSL Guidelines that were filed with the Commission in 2009:

http://www.nerc.com/files/VSL_Guidelines_20090817.pdf

Standards Development Process

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

For more information or assistance, please contact Shaun Streeter at shaun.streeter@nerc.net or at 609.452.8060.