



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Standards Announcement

Comment Period Open

November 3–December 3, 2009

Now available at:

http://www.nerc.com/filez/standards/Reliability_Standards_Under_Development.html

Project 2007-23: Violation Severity Levels

Project 2008-08: EOP Violation Severity Levels

A subset of revised Violation Severity Levels (VSLs) has been posted for a comment period **until 8 p.m. on December 3, 2009.**

Subsequent to the last ballot (August 2009) of the VSLs for the two projects listed above, NERC staff reviewed the VSLs again for consistency with the FERC Guidelines. The review identified some discrepancies and inconsistencies in the VSL assignments and some minor typographical errors. This comment period is focused only on the proposed changes necessary to resolve these inconsistencies. Each change is accompanied by an explanation that provides the rationale for the proposed change.

Instructions

The same comment form, created in Microsoft Word, is posted at both project pages:

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

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

Since the comment form addresses both projects, please submit only one form. You may submit the completed form by e-mail to sarcomm@nerc.net with the words “VSL Order Comment Form” in the subject line. If you experience any difficulties in using the form, please contact Lauren Koller at 609-452-8060 or Lauren.Koller@nerc.net.

Next Steps

The drafting team will draft and post responses to comments received during this period.

Project 2007-23 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. Here is a brief recap of the relevant “Guidelines:”

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

FERC also directed NERC to modify some VSLs, identified in Appendix A of its VSL Order.

Project 2008-08 Background

The ballot for the VSLs for the eight Emergency Preparedness and Operations (EOP) reliability standards that was conducted in 2008 failed to meet the required two-thirds majority of the weighted segment votes cast in the affirmative. As a result, the NERC Board of Trustees directed the Standards Committee to take the necessary steps needed to expedite the development of a revised group of EOP VSLs for filing with FERC.

The drafting team updated the EOP VSLs based on stakeholder comments and FERC guidance received in 2008 and stakeholder comments received in 2009.

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,
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