

## Standards Announcement

Comment Period Open

April 9–May 8, 2009

Now available at: [http://www.nerc.com/filez/standards/EOP\\_VSLs\\_Project\\_2008-08.html](http://www.nerc.com/filez/standards/EOP_VSLs_Project_2008-08.html)

### Emergency Operations Planning (EOP) Violation Severity Level (VSL) Revisions (Project 2008-08)

The Standard Drafting Team for Project 2008-08 has posted VSLs for the EOP standards for a comment period **until 8 p.m. on May 8, 2009**.

#### Special Notes for this Comment Period:

A comment form created in Microsoft Word is posted at [http://www.nerc.com/filez/standards/EOP\\_VSLs\\_Project\\_2008-08.html](http://www.nerc.com/filez/standards/EOP_VSLs_Project_2008-08.html). You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words “EOP VSL Comment Form” in the subject line. If you experience any difficulties in using the form, please contact Lauren Koller at [Lauren.Koller@nerc.net](mailto:Lauren.Koller@nerc.net).

The EOP VSLs were revised because they were not approved by the original ballot pool. The VSLs will eventually be posted for ballot with a separate ballot for each set of VSLs. (VSLs for the other standards families have been posted for comment as part of Project 2007-23.) If you have any questions on the subject information, please contact Al Calafiore at [Al.Calafiore@nerc.net](mailto:Al.Calafiore@nerc.net).

#### Project Background:

NERC conducted nine VSL ballots in January and February of 2008 — each ballot was associated with a “set” of VSLs for a family of standards. (NERC was under a FERC directive to file the VSLs with the Commission by March 2008.) All of the VSLs except those associated with the Emergency Operations standards were approved. The Board of Trustees adopted the EOP VSLs for submittal to FERC and directed the Standards Committee to take steps to expedite the development of a revised group of EOP VSLs for filing with FERC.

Subsequent to the Board’s actions, on June 19, 2008, FERC issued a VSL Order and directed NERC to review all VSL assignments (with the exception of those for which the Commission directed specific modification) for compliance with its VSL Guidelines 2b, 3, and 4 and to submit a compliance filing either validating the current VSL assignments or proposing revision. Here are the relevant “Guidelines:”

- Guideline 2b — VSLs should not use ambiguous terms such as "minor" or "significant" to describe noncompliant performance.

- Guideline 3 — VSLs should be consistent with the corresponding requirement (VSLs should not expand on what is in the requirement).
- Guideline 4 — VSLs should be based on a single violation, not on a cumulative number of violations (unless stated otherwise in the requirement).

The EOP VSL drafting team posted its first draft of revisions to the failed EOP VSLs in 2008 and modified these based on stakeholder comments and FERC's VSL Guidelines. This posting is the team's second draft of proposed EOP VSLs.

Project page: [http://www.nerc.com/filez/standards/EOP\\_VSLs\\_Project\\_2008-08.html](http://www.nerc.com/filez/standards/EOP_VSLs_Project_2008-08.html)

### **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](mailto:shaun.streeter@nerc.net) or at 609.452.8060.*

