Revisions to Outstanding VRFs and VSLs

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=2ad6e46dbebb4bb6a6334f7a7b3d00af) to submit comments to the revisions to outstanding Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs). The electronic comment form must be completed by **October 19, 2012**.

If you have questions please contact Mallory Huggins at [mallory.huggins@nerc.net](mailto:mallory.huggins@nerc.net) or by telephone at 202-644-8062. All project-related documents are available on the [project page](http://www.nerc.com/filez/standards/Revisions_Outstanding_VRFs_VSLs.html).

**Background Information**

NERC standards, legal, and enforcement staffs have been working in coordination with FERC staff to review a set of VRF and VSL assignments for possible revision or further justification. The VRFs and VSLs in need of review could have one of two origins:

* **Deferred VRFs and VSLs:** Three years ago, sub-requirement VRFs and VSLs were rolled up with main requirement VSLs, and new guidelines were issued by FERC and NERC with respect to how VRFs and VSLs are assigned. A few orders approving standards were issued in the midst of this roll-up process, and FERC deferred approval of the VRFs and VSLs associated with those standards until the new VRF/VSL assignment process was formally approved and implemented. FERC has now reviewed those VRFs and VSLs and, in cases where staff found issues that may be correctable (typos and obvious guideline violations) or that require further justification, they have identified those VRFs and VSLs to give NERC staff a chance to review them and modify them before the Commission issues a final order.
* **VSLs from “Filing 2”:** During the VRF and VSL roll-up process, NERC staff identified existing VSLs that needed modification to make them conform to the roll-up or to other aspects of the FERC and NERC guidelines. NERC staff filed those corrections in two big batches: [Filing 1](http://www.nerc.com/files/FinalFiled_VSL_Filing_030510.pdf) and [Filing 2](http://www.nerc.com/files/Final_Final_VSL_filing_complete.pdf). As with Filing 1, FERC staff has reviewed Filing 2 and identified VSLs that could require additional work before an order is issued. They are giving NERC staff a chance to address those issues now.

Both VRFs and VSLs are typically posted with standards and subject to review periods and non-binding polls. Because these VRF and VSL changes are not associated with active standards projects, there is no built-in mechanism for ensuring their review by stakeholders, but NERC staff wants to ensure that the proposed revisions or justifications for the outstanding VRFs and VSLs undergo the same industry review as other VRFs and VSLs. Thus, NERC has posted its proposals for addressing the outstanding VRFs and VSLs for a 45-day comment period and 10-day nonbinding poll.

Unless substantive modifications are required after the comment period and non-binding poll, the VRFs and VSLs will be presented to the NERC Board of Trustees for approval and filed with FERC. FERC has requested a filing no later than February 2013.

Enter all comments in simple text format, as bullets points, numbers and special formatting will not be retained.

Insert a “check” mark in the appropriate box by double-clicking the gray area.

**Questions:**

1. Do you support NERC staff’s proposals for addressing the outstanding VRFs and VSLs – in some cases, modifications to the VRF and VSL assignments, and in others, additional justification for the standard drafting team’s original assignment(s)? If not, cite the standard and requirement and VRF or VSL assignment you disagree with, using the [VRF Criteria and Guidelines](http://www.nerc.com/files/Violation_Risk_Factors.pdf) and/or [VSL Guidelines](http://www.nerc.com/files/VSL_Guidelines_20090817.pdf) to support your comment(s).

Yes

No

Comments: