

# Violation Risk Factor and Violation Severity Level Justifications

## COM-001-3 – Communications

### Violation Risk Factor and Violation Severity Level Justifications

This document provides the drafting team's justification for assignment of violation risk factors (VRFs) and violation severity levels (VSLs) for Requirements R12 and R13 in: COM-001-3 – Communications

Each primary requirement is assigned a VRF and a set of one or more VSLs. These elements support the determination of an initial value range for the Base Penalty Amount regarding violations of requirements in FERC-approved Reliability Standards, as defined in the ERO Sanction Guidelines.

The Reliability Coordination Standard Drafting Team (SDT) applied the following NERC criteria and FERC Guidelines when proposing VRFs and VSL for the requirements under this project.

#### NERC Criteria – Violation Risk Factors

##### *High Risk Requirement*

A requirement that, if violated, could directly cause or contribute to bulk electric system instability, separation, or a cascading sequence of failures, or could place the bulk electric system at an unacceptable risk of instability, separation, or cascading failures; or, a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to bulk electric system instability, separation, or a cascading sequence of failures, or could place the bulk electric system at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition.

##### *Medium Risk Requirement*

A requirement that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures; or, a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. However, violation of a medium risk requirement is unlikely, under emergency, abnormal, or

restoration conditions anticipated by the preparations, to lead to bulk electric system instability, separation, or cascading failures, nor to hinder restoration to a normal condition.

***Lower Risk Requirement***

A requirement that is administrative in nature and a requirement that, if violated, would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system; or, a requirement that is administrative in nature and a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. A planning requirement that is administrative in nature.

**FERC Violation Risk Factor Guidelines**

The SDT also considered consistency with the FERC Violation Risk Factor Guidelines for setting VRFs:<sup>1</sup>

***Guideline 1 – Consistency with the Conclusions of the Final Blackout Report***

The Commission seeks to ensure that Violation Risk Factors assigned to Requirements of Reliability Standards in these identified areas appropriately reflect their historical critical impact on the reliability of the Bulk-Power System.

In the VSL Order, FERC listed critical areas (from the Final Blackout Report) where violations could severely affect the reliability of the Bulk-Power System:<sup>2</sup>

- Emergency operations
- Vegetation management
- Operator personnel training
- Protection systems and their coordination
- Operating tools (capabilities)<sup>3</sup> and backup facilities
- Reactive power and voltage control
- System modeling and data exchange
- Communication protocol and facilities
- Requirements to determine equipment ratings
- Synchronized data recorders

<sup>1</sup> North American Electric Reliability Corp., 119 FERC ¶ 61,145, order on reh'g and compliance filing, 120 FERC ¶ 61,145 (2007) ("VRF Rehearing Order").

<sup>2</sup> Id. at footnote 15.

<sup>3</sup> Mandatory Reliability Standards for the Bulk-Power System, 118 FERC ¶ 61,218, FERC Stats. & Regs. ¶ 31,242 at PP 906 and 1660. (Order No. 693), order on reh'g, Mandatory Reliability Standards for the Bulk-Power System, 120 FERC ¶ 61,053 (Order No. 693-A) (2007).

- Clearer criteria for operationally critical facilities
- Appropriate use of transmission loading relief

***Guideline 2 – Consistency within a Reliability Standard***

The Commission expects a rational connection between the sub-Requirement Violation Risk Factor assignments and the main Requirement Violation Risk Factor assignment.

***Guideline 3 – Consistency among Reliability Standards***

The Commission expects the assignment of Violation Risk Factors corresponding to Requirements that address similar reliability goals in different Reliability Standards would be treated comparably.

***Guideline 4 – Consistency with NERC’s Definition of the Violation Risk Factor Level***

Guideline (4) was developed to evaluate whether the assignment of a particular Violation Risk Factor level conforms to NERC’s definition of that risk level.

***Guideline 5 – Treatment of Requirements that Co-mingle More Than One Obligation***

Where a single Requirement co-mingles a higher risk reliability objective and a lesser risk reliability objective, the VRF assignment for such Requirements must not be watered down to reflect the lower risk level associated with the less important objective of the Reliability Standard.

The following discussion addresses how the SDT considered FERC’s VRF Guidelines 2 through 5. The team did not address Guideline 1 directly because of an apparent conflict between Guidelines 1 and 4. Whereas Guideline 1 identifies a list of topics that encompass nearly all topics within NERC’s Reliability Standards and implies that these requirements should be assigned a “High” VRF, Guideline 4 directs assignment of VRFs based on the impact of a specific requirement to the reliability of the system. The SDT believes that Guideline 4 is reflective of the intent of VRFs in the first instance and therefore concentrated its approach on the reliability impact of the requirements.

There ~~are two new~~ ~~are eleven~~ requirements in the standard. ~~Neither of the requirements were assigned a “Lower” VRF. None of the eleven requirements were assigned a “Lower” VRF.~~ Requirements ~~R12-R8~~ ~~is~~ ~~are~~ assigned a “High” VRF while ~~Requirement R13~~ ~~the other three requirements are~~ ~~is~~ assigned a “Medium” VRF.

**NERC Criteria – Violation Severity Levels**

Violation Severity Levels (VSLs) define the degree to which compliance with a requirement was not achieved. Each requirement must have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple “degrees” of noncompliant performance, and may have only one, two, or three VSLs.

**Violation severity levels should be based on the guidelines shown in the table below:**

Lower	Moderate	High	Severe
<p>Missing a minor element (or a small percentage) of the required performance</p> <p>The performance or product measured has significant value as it almost meets the full intent of the requirement.</p>	<p>Missing at least one significant element (or a moderate percentage) of the required performance.</p> <p>The performance or product measured still has significant value in meeting the intent of the requirement.</p>	<p>Missing more than one significant element (or is missing a high percentage) of the required performance or is missing a single vital component.</p> <p>The performance or product has limited value in meeting the intent of the requirement.</p>	<p>Missing most or all of the significant elements (or a significant percentage) of the required performance.</p> <p>The performance measured does not meet the intent of the requirement or the product delivered cannot be used in meeting the intent of the requirement.</p>

**FERC Order of Violation Severity Levels**

FERC’s VSL guidelines are presented below, followed by an analysis of whether the VSLs proposed for Requirements R12 and R13 in the standard meet the FERC Guidelines for assessing VSLs:

***Guideline 1 – Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance***

Compare the VSLs to any prior levels of non-compliance and avoid significant changes that may encourage a lower level of compliance than was required when levels of non-compliance were used.

***Guideline 2 – Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties***

A violation of a “binary” type requirement must be a “Severe” VSL.

Do not use ambiguous terms such as “minor” and “significant” to describe noncompliant performance.

***Guideline 3 – Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement***

VSLs should not expand on what is required in the requirement.

**Guideline 4 – Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations**

... unless otherwise stated in the requirement, each instance of non-compliance with a requirement is a separate violation. Section 4 of the Sanction Guidelines states that assessing penalties on a per violation per day basis is the “default” for penalty calculations.

**VRF and VSL Justifications**

VRF Justifications – COM-001- <del>33</del> , R12- <del>R6</del>	
Proposed VRF	High
NERC VRF Discussion	
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report: N/A
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard: <del>The requirement has no sub-requirements; only one VRF is assigned, so there is no conflict. Each requirement specifies which functional entities that are required to have Interpersonal Communication capability and Alternative Interpersonal Communication capability. The VRF for each requirement are consistent with each other and are only applied at the Requirement level.</del>
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards: <del>These requirements is are</del> facility requirements that provides <u>for internal communications capability, including internal communications within the same between</u> functional entities. There are no similar facility requirements in the standards. The approved VRF for COM-001- <del>21-1</del> , R1 <del>(which proposed R1-R6-replaces)</del> is High and therefore the proposed VRF for R12- <del>R6</del> is consistent.
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs: Failure to have <u>internal</u> Interpersonal Communication capability <del>and Alternative Interpersonal Communication capability</del> could limit or prevent communication between entities and directly affect the electrical state or the capability of the Bulk Power System and could lead to Bulk Power System instability, separation, or cascading failures. Therefore, this requirement is assigned a High VRF.

VRF Justifications – COM-001- <del>33</del> , R1 <del>2</del> -R6	
Proposed VRF	High
FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation:  <del>The</del> <u>Each of the six</u> requirements, R1 <del>2</del> -R6, contains only one objective; therefore, only one VRF was assigned.

Proposed VSLs for COM-001- <del>33</del> , R1 <del>2</del> -R6				
R#	Lower	Moderate	High	Severe
R <del>12</del> <u>1</u>	N/A	N/A	N/A <del>The Reliability Coordinator failed to have Interpersonal Communication capability with one of the entities listed in Requirement R1, Parts 1.1 or 1.2, except when the Reliability Coordinator detected a failure of its Interpersonal Communication capability in accordance with Requirement R10.</del>	The Reliability Coordinator, <u>Balancing Authority, Generator Operator, or Transmission Operator</u> failed to have <u>internal Interpersonal Communication capability for the exchange of operating information.</u> <del>with two or more of the entities listed in Requirement R1, Parts 1.1 or 1.2, except when the Reliability Coordinator detected a failure of its Interpersonal Communication capability in accordance with Requirement R10.</del>
VSL Justifications – COM-001- <del>33</del> , R1 <del>2</del> -R6				
NERC VSL Guidelines			Meets NERC’s VSL guidelines. There is <u>not an an</u> incremental aspect to the violation and the VSL follows the guidelines for <u>incremental</u> violations.	
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance			<u>N/A</u> <del>The proposed requirement is a revis of COM-00-1 1.1, R1 and its sub requirements. Each sub requirement was separated out into a new stand alone requirement. The VSLs for the approved sub requirements are binary.</del>	

Proposed VSLs for COM-001- <del>33</del> , R1 <del>2</del> -R6	
	<del>however, proposed in these VSLs are increments because each entity may have multiple entities for which it must have an Interpersonal Communication capability.</del>
<p>FERC VSL G2</p> <p>Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a:</p> <p><u>The proposed VSL is consistent with Requirements R7, R8, and R11.</u> <del>N/A</del></p> <p>Guideline 2b:</p> <p>The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3</p> <p>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.</p>
<p>FERC VSL G4</p> <p>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>The VSL is based on a single violation and not cumulative violations.</p>

VRF Justifications – COM-001- <del>33</del> , R1 <del>3</del>	
Proposed VRF	Medium
NERC VRF Discussion	
FERC VRF G1 Discussion	<p>Guideline 1- Consistency w/ Blackout Report:</p> <p>N/A</p>



VRF Justifications – COM-001- <del>32</del> , R <del>13</del> <sup>7</sup>	
Proposed VRF	Medium
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard: The requirement has no sub-requirements; only one VRF is assigned, so there is no conflict.
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards: In COM-001- <del>32</del> , the Distribution Provider <del>-</del> VRF is Medium because <u>it</u> is not required to have an Alternative Interpersonal Communication <u>capability</u> . <u>The Interpersonal Communications capabilities are potentially less impactful than similar Interpersonal Communication capabilities of Reliability Coordinators, Balancing Authorities, Generator Operators, or Transmission Operators.</u> <del>and is not subject to Blackstart situations like that of the Generator Owner in Requirement R8.</del>
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs: Failure to have internal Interpersonal Communication capability could limit or prevent communication <u>within an-between</u> <del>entityes and directly</del> ; however, Bulk Power System instability, separation, or cascading failures are not likely to occur due to a failure to <del>notify another entity of the failure</del> <u>have internal Interpersonal Communication capabilities</u> . Therefore, this requirement is assigned a Medium VRF.
FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation: The requirement contains only one objective; therefore, only one VRF was assigned.

Proposed VSLs for COM-001- <del>32</del> , R <del>13</del> <sup>7</sup>				
R#	Lower	Moderate	High	Severe
<del>R7</del> <u>R13</u>	N/A	N/A	N/A <del>The Distribution Provider failed to have interpersonal Communication capability</del>	The Distribution Provider <del>-</del> failed to have <u>internal</u> Interpersonal Communication capability <u>for the exchange of operating</u>



Proposed VSLs for COM-001- <del>33</del> , R <del>137</del>				
			<del>with one of the entities listed in Requirement R7, Parts 7.1 or 7.2, except when the Distribution Provider detected a failure of its Interpersonal Communication capability in accordance with Requirement R11.</del>	<del>information... with two or more of the entities listed in Requirement R7, Parts 7.1 or 7.2, except when the Distribution Provider detected a failure of its Interpersonal Communication capability in accordance with Requirement R11.</del>
VSL Justifications – COM-001- <del>33</del> , R <del>137</del>				
NERC VSL Guidelines		Meets NERC’s VSL guidelines. There is <u>not</u> an incremental aspect to the violation and the VSL follows the guidelines for <del>incremental</del> violations.		
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance		<del>The proposed requirement is a revision to COM-001-2. The proposed VSL is binary. The proposed requirement is a revision of COM-001-1.1, R1 and its sub-requirements. Each sub-requirement was separated out into a new stand-alone requirement. The VSLs for the approved sub-requirements are incremental and this is reflected in the proposed VSLs.</del>		
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties  Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent  Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language		Guideline 2a: N/A  Guideline 2b: The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.		
FERC VSL G3 Violation Severity Level Assignment		The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent		

Proposed VSLs for COM-001- <del>3</del> , R <del>13</del>	
Should Be Consistent with the Corresponding Requirement	with the requirement.
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	The VSL is based on a single violation and not cumulative violations.

VRF Justifications—COM-001- <del>3</del> , R <del>8</del>	
Proposed VRF	High
NERC VRF Discussion	
FERC VRF G1 Discussion	<del>Guideline 1—Consistency w/ Blackout Report: N/A</del>
FERC VRF G2 Discussion	<del>Guideline 2—Consistency within a Reliability Standard: The requirement has no sub requirements; only one VRF was assigned so there is no conflict.</del>
FERC VRF G3 Discussion	<del>Guideline 3—Consistency among Reliability Standards: COM-001-2, Requirement R8 is an analog to Parts 3.4 and 5.4 and they have the same VRF (High). The Generator Owner may be subject to Blackstart plans and system restoration.</del>
FERC VRF G4 Discussion	<del>Guideline 4—Consistency with NERC Definitions of VRFs: Failure to have Interpersonal Communication capability could limit or prevent communication between entities and directly affect the electrical state or the capability of the Bulk Power System and could lead to Bulk Power System instability, separation, or cascading failures. Therefore, this requirement is assigned a High VRF.</del>
FERC VRF G5	<del>Guideline 5—Treatment of Requirements that Co-mingle More than One</del>

VRF Justifications — COM-001-3, R8	
<b>Proposed VRF</b>	<b>High</b>
<b>Discussion</b>	<b>Obligation:</b> The requirement contains only one objective; therefore, only one VRF was assigned.

Proposed VSLs for COM-001-3, R8				
R#	Lower	Moderate	High	Severe
R8	N/A	N/A	The Generator Operator failed to have Interpersonal Communication capability with one of the entities listed in Requirement R8, Parts 8.1 or 8.2, except when a Generator Operator detected a failure of its Interpersonal Communication capability in accordance with Requirement R11.	The Generator Operator failed to have Interpersonal Communication capability with two or more of the entities listed in Requirement R8, Parts 8.1 or 8.2, except when a Generator Operator detected a failure of its Interpersonal Communication capability in accordance with Requirement R11.

VSL Justifications — COM-001-3, R8	
NERC VSL Guidelines	Meets NERC's VSL guidelines. There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The most comparable VSLs for a similar requirement are for the proposed analog requirement and its parts COM-001-2, Part 3.4 and Part 5.4. This requirement specifies the two-way nature of entities having Interpersonal Communications capability. In other words, if one entity is required to have Interpersonal Communications capability with another entity, then the reciprocal should also be required or the onus would be exclusively on one entity. Since Requirement R3 and R5 are assigned incremental VSLs, it appropriate for Requirement R8 to

Proposed VSLs for COM-001-3, R8	
	<del>also be assigned an incremental VSL.</del>
<p><del>FERC VSL G2</del></p> <p><del>Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</del></p> <p><del>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</del></p> <p><del>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</del></p>	<p><del>Guideline 2a:</del></p> <p><del>N/A</del></p> <p><del>Guideline 2b:</del></p> <p><del>The proposed VSLs do not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</del></p>
<p><del>FERC VSL G3</del></p> <p><del>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</del></p>	<p><del>The proposed VSLs use the same terminology as used in the associated requirement, and are, therefore, consistent with the requirement.</del></p>
<p><del>FERC VSL G4</del></p> <p><del>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</del></p>	<p><del>The VSLs are based on a single violation and not cumulative violations.</del></p>

VRF Justifications – COM-001-3, R9	
<b>Proposed VRF</b>	<b>Medium</b>
<del>NERC VRF Discussion</del>	
<del>FERC VRF G1 Discussion</del>	

VRF Justifications—COM-001-3, R9	
Proposed VRF	Medium
FERC VRF G2 Discussion	<p><del>Guideline 2—Consistency within a Reliability Standard:</del></p> <p><del>The requirement has no sub requirements; only one VRF was assigned so there is no conflict.</del></p>
FERC VRF G3 Discussion	<p><del>Guideline 3—Consistency among Reliability Standards:</del></p> <p><del>COM-001-2, Requirement R9 is a requirement for entities to test their Alternative Interpersonal Communication capability and to take restorative action should the test fail and is a replacement requirement for COM-001-1.1, R2, which has an approved VRF of Medium.</del></p>
FERC VRF G4 Discussion	<p><del>COM-001-2, Requirement R9 is a requirement for entities to test their Alternative Interpersonal Communication capability and to take restorative action should the test fail. The act of testing in and of itself is not likely to “directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures...” Therefore, this requirement is assigned a Medium VRF.</del></p>
FERC VRF G5 Discussion	<p><del>Guideline 5—Treatment of Requirements that Co-mingle More than One Obligation:</del></p> <p><del>The requirement contains only one objective; therefore, only one VRF was assigned.</del></p>

Proposed VSLs for COM-001-3, R9				
R#	Lower	Moderate	High	Severe
R9	The Reliability Coordinator, Transmission Operator, or Balancing Authority tested the Alternative	The Reliability Coordinator, Transmission Operator, or Balancing Authority tested the Alternative	The Reliability Coordinator, Transmission Operator, or Balancing Authority tested the Alternative	The Reliability Coordinator, Transmission Operator, or Balancing Authority failed to test the Alternative

Proposed VSLs for COM-001-2, R9				
	Interpersonal Communication capability but failed to initiate action to repair or designate a replacement Alternative Interpersonal Communication in more than 2 hours and less than or equal to 4 hours upon an unsuccessful test.	Interpersonal Communication capability but failed to initiate action to repair or designate a replacement Alternative Interpersonal Communication in more than 4 hours and less than or equal to 6 hours upon an unsuccessful test.	Interpersonal Communication capability but failed to initiate action to repair or designate a replacement Alternative Interpersonal Communication in more than 6 hours and less than or equal to 8 hours upon an unsuccessful test.	Interpersonal Communication capability once each calendar month. OR The Reliability Coordinator, Transmission Operator, or Balancing Authority tested the Alternative Interpersonal Communication capability but failed to initiate action to repair or designate a replacement Alternative Interpersonal Communication in more than 8 hours upon an unsuccessful test.
VSL Justifications – COM-001-2, R9				
NERC VSL Guidelines		Meets NERC’s VSL guidelines. There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.		
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance		The proposed requirement is a new and there are no comparable VSLs.		
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the		Guideline 2a: N/A		

Proposed VSLs for COM-001-2, R9	
<p><del>Determination of Penalties</del></p> <p><del>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</del></p> <p><del>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</del></p>	<p><del>Guideline 2b:</del></p> <p><del>The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</del></p>
<p><del>FERC VSL G3</del></p> <p><del>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</del></p>	<p><del>The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.</del></p>
<p><del>FERC VSL G4</del></p> <p><del>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</del></p>	<p><del>The VSL is based on a single violation and not cumulative violations.</del></p>

VRF Justifications – COM-001-2, R10	
Proposed VRF	Medium
NERC VRF Discussion	
FERC VRF G1 Discussion	
FERC VRF G2 Discussion	<p><del>Guideline 2 – Consistency within a Reliability Standard:</del></p> <p><del>The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.</del></p>
FERC VRF G3 Discussion	<p><del>Guideline 3 – Consistency among Reliability Standards:</del></p> <p><del>COM-001-2, Requirement R10 is a new requirement that was assigned a Medium VRF. When evaluating the VRF to be assigned to this requirement, the SDT took into account that this requirement is a notification item, not an</del></p>



VRF Justifications—COM-001-2, R10	
Proposed VRF	Medium
	actual action that has a direct impact on the Bulk Power System. Therefore, the simple act of failing to notify another entity of the failure of Interpersonal Communication capability, while it may impair the entity's ability to communicate, does not, in itself, lead to Bulk Power System instability, separation, or cascading failures. Therefore, this requirement is assigned a Medium VRF.
FERC VRF G4 Discussion	Guideline 4—Consistency with NERC Definitions of VRFs: COM-001-2, Requirement R10 mandates that entities notify entities of a failure of Interpersonal Communications capability. Bulk Power System instability, separation, or cascading failures are not likely to occur due to a failure to notify another entity of the failure. Therefore, this requirement is assigned a Medium VRF.
FERC VRF G5 Discussion	Guideline 5—Treatment of Requirements that Co-mingle More than One Obligation: The requirement contains only one objective; therefore, only one VRF was assigned.

Proposed VSLs for COM-001-2, R10				
R#	Lower	Moderate	High	Severe
R10	The Reliability Coordinator, Transmission Operator, or Balancing Authority failed to notify the entities identified in Requirements R1, R3, and R5, respectively upon the detection of a failure of its Interpersonal	The Reliability Coordinator, Transmission Operator, or Balancing Authority failed to notify the entities identified in Requirements R1, R3, and R5, respectively upon the detection of a failure of its Interpersonal	The Reliability Coordinator, Transmission Operator, or Balancing Authority failed to notify the entities identified in Requirements R1, R3, and R5, respectively upon the detection of a failure of its Interpersonal Communication	The Reliability Coordinator, Transmission Operator, or Balancing Authority failed to notify the entities identified in Requirements R1, R3, and R5, respectively upon the detection of a failure of its

Proposed VSLs for COM-001-3, R10				
	Communication capability in more than 60 minutes but less than or equal to 70 minutes.	Communication capability in more than 70 minutes but less than or equal to 80 minutes.	capability in more than 80 minutes but less than or equal to 90 minutes.	Interpersonal Communication capability in more than 90 minutes.
VSL Justifications— COM-001-3, R10				
NERC VSL Guidelines		Meets NERC's VSL guidelines. There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.		
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance		The proposed requirement is new and there are no comparable VSLs.		
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties  Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent  Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language		Guideline 2a: N/A  Guideline 2b: The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.		
FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement		The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.		
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations		The VSL is based on a single violation and not cumulative violations.		

VRF Justifications—COM-001-2, R11	
Proposed VRF	Medium
NERC VRF Discussion	
FERC VRF G1 Discussion	
FERC VRF G2 Discussion	<p><del>Guideline 2—Consistency within a Reliability Standard:</del></p> <p><del>The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.</del></p>
FERC VRF G3 Discussion	<p><del>Guideline 3—Consistency among Reliability Standards:</del></p> <p><del>COM-001-2, Requirement R11 is a new requirement that was assigned a Medium VRF. When evaluating the VRF to be assigned to this requirement, the SDT took into account that this requirement is a consultation item, not an actual action that has a direct impact on the Bulk Power System. Therefore, the simple act of failing to consult with another entity on the failure of Interpersonal Communications capability and its restoration, while it may impair the entity’s ability communicate, does not, in itself, lead to Bulk Power System instability, separation, or cascading failures. Therefore, this requirement is assigned a Medium VRF.</del></p>
FERC VRF G4 Discussion	<p><del>Guideline 4—Consistency with NERC Definitions of VRFs:</del></p> <p><del>COM-001-2, Requirement R11 mandates that entities consult with other entities regarding restoration of Interpersonal Communication capability. Bulk Power System instability, separation, or cascading failures are not likely to occur due to a failure to consult with another entity on restoration times. Therefore, this requirement is assigned a Medium VRF.</del></p>
FERC VRF G5 Discussion	<p><del>Guideline 5—Treatment of Requirements that Co-mingle More than One Obligation:</del></p> <p><del>The requirement contains only one objective; therefore, only one VRF was assigned.</del></p>

Proposed VSLs for COM-001-3, R11				
R#	Lower	Moderate	High	Severe
R11	N/A	N/A	N/A	The Distribution Provider or Generator Operator that detected a failure of its Interpersonal Communication capability failed to consult with each entity affected by the failure, as identified in Requirement R7 for a Distribution Provider or Requirement R8 for a Generator Operator, to determine a mutually agreeable action for the restoration of the Interpersonal Communication capability.
VSL Justifications—COM-001-3, R11				
NERC VSL Guidelines			Meets NERC’s VSL guidelines. This is a binary requirement and the VSL is severe.	
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance			The proposed requirement is new and there are no comparable existing VSLs.	
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language			Guideline 2a: N/A Guideline 2b: The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	
FERC VSL G3			The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the	

Proposed VSLs for COM-001-3, R11	
<p><del>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</del></p>	<p><del>requirement.</del></p>
<p><del>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</del></p>	<p><del>The VSL is based on a single violation and not cumulative violations.</del></p>