

Violation Risk Factor and Violation Severity Level Justifications

Project 2022-02 Uniform Modeling Framework for IBR

This document provides the drafting team's justification for assignment of violation risk factors (VRFs) and violation severity levels (VSLs) for each requirement in Project 2022-02 Uniform Modeling Framework for Inverter-Based Resources (IBRs). Each requirement is assigned a VRF and a VSL. These elements support the determination of an initial value range for the Base Penalty Amount regarding violations of requirements in the Federal Energy Regulatory Commission (FERC)-approved Reliability Standards, as defined in the Electric Reliability Organizations (ERO) Sanction Guidelines. The drafting team applied the following North American Electric Reliability Corporation (NERC) criteria and FERC Guidelines when developing the VRFs and VSLs for the requirements.

NERC Criteria for 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.

FERC Guidelines for Violation Risk Factors

Guideline (1) – Consistency with the Conclusions of the Final Blackout Report

FERC seeks to ensure that VRFs 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:

- Emergency operations
- Vegetation management
- Operator personnel training
- Protection systems and their coordination
- Operating tools 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
- Clearer criteria for operationally critical facilities
- Appropriate use of transmission loading relief.

Guideline (2) – Consistency within a Reliability Standard

FERC expects a rational connection between the sub-Requirement VRF assignments and the main Requirement VRF assignment.

Guideline (3) – Consistency among Reliability Standards

FERC expects the assignment of VRFs 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 VRF 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.

NERC Criteria for 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.

VSLs should be based on NERC’s overarching criteria shown in the table below:

Lower VSL	Moderate VSL	High VSL	Severe VSL
The performance or product measured almost meets the full intent of the requirement.	The performance or product measured meets the majority of the intent of the requirement.	The performance or product measured does not meet the majority of the intent of the requirement, but does meet some of the intent.	The performance or product measured does not substantively meet the intent of the requirement.

FERC Order of Violation Severity Levels

The FERC VSL guidelines are presented below, followed by an analysis of whether the VSLs proposed for each requirement 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.

MOD-032-2

VRF Justification for MOD-032-2, Requirement R1

The VRF did not change from the previously FERC approved MOD-032-1 Reliability Standard. The modifications made to Requirement R1 require model submission in accordance with the Criteria for Acceptable Models maintained by the ERO. This is similar to other sub-requirements in Requirements R1; therefore, the VRF remained a low.

VSL Justification for MOD-032-2, Requirement R1

Please refer to the VSL table below.

VRF Justification for MOD-032-2, Requirement R2

The VRF did not change from the previously FERC approved MOD-032-1 Reliability Standard. “Load Serving Entity” was replaced with “Distribution Provider” from Requirement R2 in MOD-032-2. In addition, Requirement R2 added a sub-requirement requiring if entity is unable to gather unregistered IBR data or Distributed Energy Resource (DER) data to complete an estimate. These modifications align with the medium risk requirement and therefore, the VRF remained medium.

VSL Justification for MOD-032-2, Requirement R2

Please refer to the VSL table located below.

VRF Justification for MOD-032-2, Requirement R3

The VRF did not change from the previously FERC approved MOD-032-1 Reliability Standard. The modifications made to Requirement R3 were administrative in nature; therefore, the VRF remained a low.

VSL Justification for MOD-032-2, Requirement R3

Please refer to the VSL table located below.

VRF Justification for MOD-032-2, Requirement R4

The VRF did not change from the previously FERC approved MOD-032-1 Reliability Standard.

VSL Justification for MOD-032-2, Requirement R4

The VSL did not change from the previously FERC approved MOD-032-1 Reliability Standard.

VSLs for MOD-032-1, Requirement 1			
Lower	Moderate	High	Severe
The Planning Coordinator and Transmission Planner(s) developed steady-state, dynamics, and short circuit modeling data requirements and reporting procedures, but failed to include less than or equal to 25% of the required components specified in Requirement R1.	The Planning Coordinator and Transmission Planner(s) developed steady-state, dynamics, and short circuit modeling data requirements and reporting procedures, but failed to include greater than 25%, but less than or equal to 50% of the required components specified in Requirement R1.	The Planning Coordinator and Transmission Planner(s) developed steady-state, dynamics, and short circuit modeling data requirements and reporting procedures, but failed to include greater than 50%, but less than or equal to 75% of the required components specified in Requirement R1.	The Planning Coordinator and Transmission Planner(s) did not develop any steady-state, dynamics, and short circuit modeling data requirements and reporting procedures required by Requirement R1; OR The Planning Coordinator and Transmission Planner(s) developed steady-state, dynamics, and short circuit modeling data requirements and reporting procedures, but failed to include greater than 75% of the required components specified in Requirement R1.

VSL Justifications for MOD-032-1, Requirement 1

FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The requirement was modified by adding an additional sub-requirement to Requirement R1. The proposed VSL was modified to reflect the additional sub-requirement. It does not have an unintended consequence of lowering the level of compliance.
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a</u> : The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b</u> : Violation Severity Level Assignments that Contain Ambiguous Language	The updated sub-requirement requires the responsible entity to follow the Criteria for Acceptable Models document maintained by the Electric Reliability Organization. The VSLs are not binary and do not contain ambiguous language.
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; therefore, it is 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	Each VSL is based on a single violation and not cumulative violations.

VSLs for MOD-032-1, Requirement 2

Lower	Moderate	High	Severe
<p>The Balancing Authority, Distribution Provider, Generator Owner Resource Planner, Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s), but failed to provide less than or equal to 25% of the required data specified in Attachment 1;</p> <p>OR</p> <p>The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner, Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s), but less than or equal to 25% of the required data failed to meet data format, shareability, level</p>	<p>The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner, Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s), but failed to provide greater than 25%, but less than or equal to 50% of the required data specified in Attachment 1;</p> <p>OR</p> <p>The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner, Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s), but greater than 25%, but less than or equal to 50% of the required data failed to meet data format,</p>	<p>The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner, Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s), but failed to provide greater than 50%, but less than or equal to 75% of the required data specified in Attachment 1;</p> <p>OR</p> <p>The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner, Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s), but greater than 50%, but less than or equal to 75% of the required data failed to meet data format,</p>	<p>The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner, Transmission Owner, or Transmission Service Provider did not provide any steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s);</p> <p>OR</p> <p>The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner, Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s), but failed to provide greater than 75% of the required data specified in Attachment 1;</p> <p>OR</p> <p>The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner,</p>

<p>of detail, or case type specifications;</p> <p>OR</p> <p>The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner, Transmission Owner, or Transmission Service Provider failed to provide steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s) within the schedule specified by the data requirements and reporting procedures, but did provide the data in less than or equal to 15 calendar days after the specified date.</p>	<p>shareability, level of detail, or case type specifications;</p> <p>OR</p> <p>The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner, Transmission Owner, or Transmission Service Provider failed to provide steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s) within the schedule specified by the data requirements and reporting procedures, but did provide the data in greater than 15, but less than or equal to 30 calendar days after the specified date.</p>	<p>shareability, level of detail, or case type specifications;</p> <p>OR</p> <p>The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner, Transmission Owner, or Transmission Service Provider failed to provide steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s) within the schedule specified by the data requirements and reporting procedures, but did provide the data in greater than 30, but less than or equal to 45 calendar days after the specified date.</p>	<p>Transmission Owner, or Transmission Service Provider provided steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s), but greater than 75% of the required data failed to meet data format, shareability, level of detail, or case type specifications;</p> <p>OR</p> <p>The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner, Transmission Owner or Transmission Service Provider failed to provide steady-state, dynamics, and short circuit modeling data to its Transmission Planner(s) and Planning Coordinator(s) within the schedule specified by the data requirements and reporting procedures, but did provide the data in greater than 45 calendar days after the specified date.</p>
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VSL Justifications for MOD-032-1, Requirement 2

FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	“Load Serving Entity” was replaced with “Distribution Provider” from Requirement R2 and a sub-requirement was added requiring if entity is unable to gather unregistered IBR data or DER data to complete an estimate. The proposed VSL was modified to reflect the additional sub-requirement language. It does not have an unintended consequence of lowering the level of compliance.
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a</u> : The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b</u> : Violation Severity Level Assignments that Contain Ambiguous Language	The updated sub-requirement requires the entity if it is unable to gather unregistered IBR data or DER data to complete an estimate. The VSLs are not binary and do not contain ambiguous language.
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; therefore, it is 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	Each VSL is based on a single violation and not cumulative violations.

VSLs for MOD-032-1, Requirement 3

Lower	Moderate	High	Severe
The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner, Transmission Owner, or Transmission Service Provider failed to provide a written response to its Transmission Planner(s) or Planning Coordinator(s) according to the specifications of Requirement R3 within 90 calendar days (or within a longer period agreed upon by the notifying Planning Coordinator or Transmission Planner), but did provide the response within 105 calendar days (or within 15 calendar days after the longer period agreed upon by the notifying Planning Coordinator or Transmission Planner).	The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner, Transmission Owner, or Transmission Service Provider failed to provide a written response to its Transmission Planner(s) or Planning Coordinator(s) according to the specifications of Requirement R3 within 90 calendar days (or within a longer period agreed upon by the notifying Planning Coordinator or Transmission Planner), but did provide the response within greater than 105 calendar days, but less than or equal to 120 calendar days (or within greater than 15 calendar days, but less than or equal to 30 calendar days after the longer period agreed upon by the notifying Planning Coordinator or Transmission Planner).	The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner, Transmission Owner, or Transmission Service Provider failed to provide a written response to its Transmission Planner(s) or Planning Coordinator(s) according to the specifications of Requirement R3 within 90 calendar days (or within a longer period agreed upon by the notifying Planning Coordinator or Transmission Planner), but did provide the response within greater than 120 calendar days, but less than or equal to 135 calendar days (or within greater than 30 calendar days, but less than or equal to 45 calendar days after the longer period agreed upon by the notifying Planning Coordinator or Transmission Planner).	The Balancing Authority, Distribution Provider, Generator Owner, Resource Planner, Transmission Owner, or Transmission Service Provider failed to provide a written response to its Transmission Planner(s) or Planning Coordinator(s) according to the specifications of Requirement R3 within 135 calendar days (or within a longer period agreed upon by the notifying Planning Coordinator or Transmission Planner).

VSL Justifications for MOD-032-1, Requirement 3

FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The requirement was modified by replacing Load Serving Entity with Distribution provider. The proposed VSL was modified to reflect this modification. It does not have an unintended consequence of lowering the level of compliance.
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a</u> : The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b</u> : Violation Severity Level Assignments that Contain Ambiguous Language	The VSLs are not binary and do not contain ambiguous language.
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; therefore, it is 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	Each VSL is based on a single violation and not cumulative violations.

IRO-010-5

VRF Justification for IRO-010-5, Requirement R1

The VRF did not change from the previously FERC approved IRO-010-4 Reliability Standard. The modifications made to Requirement R1 require IBR-specific data and parameters to be added to the list of data and information needed by the Reliability Coordinator per Part 1.1. and model submission in accordance with the Criteria for Acceptable Models maintained by the Electric Reliability Organization per Part 1.5.3. This is similar to other sub-requirements in R1; therefore, the VRF remained a low.

VSL Justification for IRO-010-5, Requirement R1

Please refer to the VSL table located below.

VRF Justification for IRO-010-5, Requirement R1

The VRF did not change from the previously FERC approved IRO-010-4 Reliability Standard.

VSL Justification for IRO-010-5, Requirement R2

The VSL did not change from the previously FERC approved IRO-010-4 Reliability Standard.

VRF Justification for IRO-010-5, Requirement R3

The VRF did not change from the previously FERC approved IRO-010-4 Reliability Standard.

VSL Justification for IRO-010-5, Requirement R3

The VSL did not change from the previously FERC approved IRO-010-4 Reliability Standard.

VSLs for IRO-010-5, Requirement 1			
Lower	Moderate	High	Severe
The Reliability Coordinator did not include one or two of the parts (Part 1.1 through Part 1.5) of the documented specification(s) for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	The Reliability Coordinator did not include three of the parts (Part 1.1 through Part 1.5) of the documented specification(s) for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	The Reliability Coordinator did not include four of the parts (Part 1.1 through Part 1.5) of the documented specification(s) for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	<p>The Reliability Coordinator did not include any of the parts (Part 1.1 through Part 1.5) of the documented specification(s) for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.</p> <p>OR,</p> <p>The Reliability Coordinator did not have a documented specification(s) for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.</p>

VSL Justifications for IRO-010-5, Requirement 1	
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The requirement was modified by adding additional sub-requirements to Requirement R1. The purposed VSL was modified to reflect the additional sub requirement. It does not have an unintended consequence of lowering the level of compliance.
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a</u> : The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b</u> : Violation Severity Level Assignments that Contain Ambiguous Language	The VSLs are not binary and do not contain ambiguous language.
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; therefore, it is 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	Each VSL is based on a single violation and not cumulative violations.

TOP-003-8

VRF Justification for TOP-003-8, Requirement R1

The VRF did not change from the previously FERC approved TOP-003-8 Reliability Standard. The modifications made to Requirement R1 require IBR-specific data and parameters to be added to the list of data and information needed by the Reliability Coordinator per Part 1.1. and model submission in accordance with the Criteria for Acceptable Models maintained by the Electric Reliability Organization per Part 1.5.3. This is similar to other sub-requirements in R1; therefore, the VRF remained a low.

VSL Justification for TOP-003-8, Requirement R1

Please refer to the VSL table located below.

VRF Justification for TOP-003-8, Requirement R2

The VRF did not change from the previously FERC approved TOP-003-8 Reliability Standard. The modifications made to Requirement R1 require IBR-specific data and parameters to be added to the list of data and information needed by the Reliability Coordinator per Part 1.1. and model submission in accordance with the Criteria for Acceptable Models maintained by the Electric Reliability Organization per Part 1.5.3. This is similar to other sub-requirements in R1; therefore, the VRF remained a low.

VSL Justification for TOP-003-8, Requirement R2

The VSL did not change from the previously FERC approved TOP-003-7 Reliability Standard.

VRF Justification for TOP-003-8, Requirement R3

The VRF did not change from the previously FERC approved TOP-003-7 Reliability Standard.

VSL Justification for TOP-003-8, Requirement R3

The VSL did not change from the previously FERC approved TOP-003-7 Reliability Standard.

VRF Justification for TOP-003-8, Requirement R4

The VRF did not change from the previously FERC approved TOP-003-7 Reliability Standard.

VSL Justification for TOP-003-8, Requirement R4

The VSL did not change from the previously FERC approved TOP-003-7 Reliability Standard.

VRF Justification for TOP-003-8, Requirement R5

The VRF did not change from the previously FERC approved TOP-003-7 Reliability Standard.

VSL Justification for TOP-003-8, Requirement R5

The VSL did not change from the previously FERC approved TOP-003-7 Reliability Standard.

VSLs for TOP-003-8, Requirement 1			
Lower	Moderate	High	Severe
The Transmission Operator did not include one or two of the parts (Part 1.1 through Part 1.5) of the documented specification(s) for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	The Transmission Operator did not include three of the parts (Part 1.1 through Part 1.5) of the documented specification(s) for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	The Transmission Operator did not include four of the parts (Part 1.1 through Part 1.5) of the documented specification(s) for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	<p>The Transmission Operator did not include any of the parts (Part 1.1 through Part 1.5) of the documented specification(s) for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.</p> <p>OR,</p> <p>The Transmission Operator did not have a documented specification(s) for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.</p>

VSL Justifications for TOP-003-8, Requirement 1	
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The requirement was modified by adding additional sub-requirements to Requirement R1. The purposed VSL was modified to reflect the additional sub requirement. It does not have an unintended consequence of lowering the level of compliance.
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a</u> : The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b</u> : Violation Severity Level Assignments that Contain Ambiguous Language	The proposed VSL uses the same terminology as used in the associated requirement; therefore, it is consistent with the requirement.
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; therefore, it is 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	Each VSL is based on a single violation and not cumulative violations.

VSLs for TOP-003-8, Requirement 2			
Lower	Moderate	High	Severe
The Balancing Authority did not include two or fewer of the parts (Part 2.1 through Part 2.5) of the documented specification(s) for the data and information necessary for it to perform its analysis functions, Real-time monitoring, and Near-Term Energy Reliability Assessments.	The Balancing Authority did not include three of the parts (Part 2.1 through Part 2.5) of the documented specification(s) for the data and information necessary for it to perform its analysis functions, Real-time monitoring, and Near-Term Energy Reliability Assessments.	The Balancing Authority did not include four of the parts (Part 2.1 through Part 2.5) of the documented specification(s) for the data and information necessary for it to perform its analysis functions, Real-time monitoring, and Near-Term Energy Reliability Assessments.	The Balancing Authority did not include any of the parts (Part 2.1 through Part 2.5) of the documented specification(s) for the data and information necessary for it to perform its analysis functions, Real-time monitoring, and Near-Term Energy Reliability Assessments.

VSL Justifications for TOP-003-8, Requirement 2	
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The requirement was modified by adding additional sub-requirements to Requirement R2. The proposed VSL was modified to reflect the additional sub requirement. It does not have an unintended consequence of lowering the level of compliance.
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language	The proposed VSL uses the same terminology as used in the associated requirement; therefore, it is consistent with the requirement.
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; therefore, it is 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	Each VSL is based on a single violation and not cumulative violations.