

Violation Risk Factor and Violation Severity Level Justifications

Project 2023-07 Transmission System Planning Performance Requirements for Extreme Weather

This document provides the standard drafting team's (SDT's) justification for assignment of violation risk factors (VRFs) and violation severity levels (VSLs) for each requirement in Project 2023-07 Transmission System Planning Performance Requirements for Extreme Weather. 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 FERC-approved Reliability Standards, as defined in the Electric Reliability Organizations (ERO) Sanction Guidelines. The SDT applied the following 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.

VRF Justifications for TPL-008-1, Requirement R1	
Proposed VRF	Lower
NERC VRF Discussion	A VRF of Lower is appropriate due to the fact that the Planning Coordinators, in conjunction with its Transmission Planner(s) will determine joint responsibilities for requirements throughout TPL-008-1.
FERC VRF G1 Discussion Guideline 1- Consistency with Blackout Report	This VRF is in line with the identified areas from the FERC list of critical areas in the Final Blackout Report.
FERC VRF G2 Discussion Guideline 2- Consistency within a Reliability Standard	This requirement has only a main VRF and no different sub-requirement VRFs.
FERC VRF G3 Discussion Guideline 3- Consistency among Reliability Standards	This VRF is in line with other VRFs that address similar reliability goals in different Reliability Standards.
FERC VRF G4 Discussion Guideline 4- Consistency with NERC Definitions of VRFs	The assigned VRF is consistent with NERC definition of VRFs.
FERC VRF G5 Discussion Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation	This requirement does not mingle a higher risk reliability objective and a lesser risk reliability objective. Therefore, the VRF reflects the risk of the whole requirement.

VSLs for TPL-008-1, Requirement R1

Lower	Moderate	High	Severe
N/A	N/A	N/A	The Planning Coordinator, in conjunction with its Transmission Planner(s), failed to determine and identify individual and joint responsibilities for completing the Extreme Temperature Assessment.

VSL Justifications for TPL-008-1, Requirement R1

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The requirement is new. Therefore, the proposed VSL do not have the unintended consequence of lowering the level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p><u>Guideline 2a</u>: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>The VSL has been assigned as a binary due to the Planning Coordinator and Transmission Planner to determine who completes the responsibilities throughout TPL-008-1. The responsibilities documentation will either be developed or not.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL use the same terminology as used in the associated requirement and are, therefore, consistent with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

VRF Justifications for TPL-008-1, Requirement R2

Proposed VRF	High
NERC VRF Discussion	A VRF of high is appropriate due to the fact that selecting a benchmark event to perform an extreme temperature assessment can affect the grid based on planning analysis for future events.
FERC VRF G1 Discussion Guideline 1- Consistency with Blackout Report	This VRF is in line with the identified areas from the FERC list of critical areas in the Final Blackout Report.
FERC VRF G2 Discussion Guideline 2- Consistency within a Reliability Standard	This requirement has only a main VRF and no different sub-requirement VRFs.
FERC VRF G3 Discussion Guideline 3- Consistency among Reliability Standards	This VRF is in line with other VRFs that address similar reliability goals in different Reliability Standards.
FERC VRF G4 Discussion Guideline 4- Consistency with NERC Definitions of VRFs	The assigned VRF is consistent with NERC definition of VRFs.
FERC VRF G5 Discussion Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation	This requirement does not mingle a higher risk reliability objective and a lesser risk reliability objective. Therefore, the VRF reflects the risk of the whole requirement.

VSLs for TPL-008-1, Requirement R2

Lower	Moderate	High	Severe
N/A	N/A	The responsible entity did not select at least one extreme heat benchmark event or extreme cold benchmark temperature event from the ERO approved benchmark library for performing the Extreme Temperature Assessment.	The responsible entity did not select an extreme heat benchmark event and extreme cold benchmark temperature event from the ERO approved benchmark library for performing the Extreme Temperature Assessment.

VSL Justifications for TPL-008-1, Requirement R2

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The requirement is new. Therefore, the proposed VSL do not have the unintended consequence of lowering the level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p><u>Guideline 2a</u>: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>This VSL has been assigned as a binary due to the benchmark event needing to be selected for benchmark planning cases to be completed. You either select a benchmark event or not.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL use the same terminology as used in the associated requirement and are, therefore, consistent with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

VRF Justifications for TPL-008-1, Requirement R3

Proposed VRF	High
NERC VRF Discussion	A VRF of high is appropriate due to the fact that it is important to develop and maintain System models within an entity’s planning area for performing Extreme Temperature Assessments. Connecting to MOD-032 to provide important data needed to assist entities with System models is also important for accurate information to be used.
FERC VRF G1 Discussion Guideline 1- Consistency with Blackout Report	This VRF is in line with the identified areas from the FERC list of critical areas in the Final Blackout Report.
FERC VRF G2 Discussion Guideline 2- Consistency within a Reliability Standard	This requirement has only a main VRF and no different sub-requirement VRFs.
FERC VRF G3 Discussion Guideline 3- Consistency among Reliability Standards	This VRF is in line with other VRFs that address similar reliability goals in different Reliability Standards.
FERC VRF G4 Discussion Guideline 4- Consistency with NERC Definitions of VRFs	The assigned VRF is consistent with NERC definition of VRFs.
FERC VRF G5 Discussion Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation	This requirement does not mingle a higher risk reliability objective and a lesser risk reliability objective. Therefore, the VRF reflects the risk of the whole requirement.

VSLs for TPL-008-1, Requirement R3

Lower	Moderate	High	Severe
N/A	N/A	N/A	<p>The Planning Coordinator did not develop or implement a process for coordinating the development of benchmark planning cases among impacted adjacent Planning Coordinator(s), Transmission Planner(s), and other designated study entities, within the same Interconnection.</p> <p>OR</p> <p>The Planning Coordinator developed and implemented a process for coordinating the development of benchmark planning cases among impacted adjacent Planning Coordinator(s), Transmission Planner(s), and other designated study entities within the same Interconnection, but this process did not modify the benchmark planning cases to include seasonal and temperature dependent adjustments load, generation, Transmission, and transfers.</p>

VSL Justifications for TPL-008-1, Requirement R3

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The requirement is new. Therefore, the proposed VSL do not have the unintended consequence of lowering the level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p><u>Guideline 2a</u>: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>The VSL has been assigned as a binary due to the responsible entity either develops and maintains the System models within its planning area or it does not develop and maintain the System models within its planning area.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL use the same terminology as used in the associated requirement and are, therefore, consistent with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

VRF Justifications for TPL-008-1, Requirement R4

Proposed VRF	Medium
NERC VRF Discussion	The VRF of Medium is appropriate because it could directly affect the electrical state or capability of the BPS if coordination is not completed for benchmark planning cases and sensitivity cases for the Extreme Temperature Assessment results.
FERC VRF G1 Discussion Guideline 1- Consistency with Blackout Report	This VRF is in line with the identified areas from the FERC list of critical areas in the Final Blackout Report.
FERC VRF G2 Discussion Guideline 2- Consistency within a Reliability Standard	This requirement has only a main VRF and no different sub-requirement VRFs.
FERC VRF G3 Discussion Guideline 3- Consistency among Reliability Standards	This VRF is in line with other VRFs that address similar reliability goals in different Reliability Standards.
FERC VRF G4 Discussion Guideline 4- Consistency with NERC Definitions of VRFs	The assigned VRF is consistent with NERC definition of VRFs.
FERC VRF G5 Discussion Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation	This requirement does not mingle a higher risk reliability objective and a lesser risk reliability objective. Therefore, the VRF reflects the risk of the whole requirement.

VSLs for TPL-008-1, Requirement R4

Lower	Moderate	High	Severe
N/A	N/A	N/A	<p>The responsible entity did not develop or maintain benchmark planning cases or sensitivity cases for performing the Extreme Temperature Assessment.</p> <p>OR</p> <p>The responsible entity developed and maintained benchmark planning cases or sensitivity cases for performing the Extreme Temperature Assessment but did not use data consistent with that provided in accordance with the MOD-032 standard.</p>

VSL Justifications for TPL-008-1, Requirement R4

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The requirement is new. Therefore, the proposed VSL do not have the unintended consequence of lowering the level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p><u>Guideline 2a</u>: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>The VSL has been assigned as a binary due to the Planning Coordinator to develop and implement a process for coordinating the development of benchmark planning cases. The benchmark planning cases will either be developed and implemented or not.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL use the same terminology as used in the associated requirement and are, therefore, consistent with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

VRF Justifications for TPL-008-1, Requirement R5

Proposed VRF	High
NERC VRF Discussion	A VRF of High is appropriate due to the importance of having criteria for acceptable System steady state voltage limits of post-Contingency voltage deviations for performing Extreme Temperature Assessments.
FERC VRF G1 Discussion Guideline 1- Consistency with Blackout Report	This VRF is in line with the identified areas from the FERC list of critical areas in the Final Blackout Report.
FERC VRF G2 Discussion Guideline 2- Consistency within a Reliability Standard	This requirement has only a main VRF and no different sub-requirement VRFs.
FERC VRF G3 Discussion Guideline 3- Consistency among Reliability Standards	This VRF is in line with other VRFs that address similar reliability goals in different Reliability Standards.
FERC VRF G4 Discussion Guideline 4- Consistency with NERC Definitions of VRFs	The assigned VRF is consistent with NERC definition of VRFs.
FERC VRF G5 Discussion Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation	This requirement does not mingle a higher risk reliability objective and a lesser risk reliability objective. Therefore, the VRF reflects the risk of the whole requirement.

VSLs for TPL-008-1, Requirement R5

Lower	Moderate	High	Severe
N/A	N/A	N/A	The responsible entity, as determined in Requirement R1, did not have criteria for acceptable System steady state voltage limits, post-Contingency voltage deviations, and applicable Facility Ratings for performing Extreme Temperature Assessment.

VSL Justifications for TPL-008-1, Requirement R5

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The requirement is new. Therefore, the proposed VSL do not have the unintended consequence of lowering the level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p><u>Guideline 2a</u>: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>The VSL has been assigned as a binary due to the responsible entity either having acceptable criteria for System steady state voltage limits and post-contingency voltage deviations or not.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL use the same terminology as used in the associated requirement and are, therefore, consistent with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

VRF Justifications for TPL-008-1, Requirement R6

Proposed VRF	High
NERC VRF Discussion	A VRF of High is appropriate due to the importance of defining and documenting the criteria or methodology for System instability, uncontrolled separation, or Cascading.
FERC VRF G1 Discussion Guideline 1- Consistency with Blackout Report	This VRF is in line with the identified areas from the FERC list of critical areas in the Final Blackout Report.
FERC VRF G2 Discussion Guideline 2- Consistency within a Reliability Standard	This requirement has only a main VRF and no different sub-requirement VRFs.
FERC VRF G3 Discussion Guideline 3- Consistency among Reliability Standards	This VRF is in line with other VRFs that address similar reliability goals in different Reliability Standards.
FERC VRF G4 Discussion Guideline 4- Consistency with NERC Definitions of VRFs	The assigned VRF is consistent with NERC definition of VRFs.
FERC VRF G5 Discussion Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation	This requirement does not mingle a higher risk reliability objective and a lesser risk reliability objective. Therefore, the VRF reflects the risk of the whole requirement.

VSLs for TPL-008-1, Requirement R6

Lower	Moderate	High	Severe
N/A	N/A	N/A	The responsible entity failed to define and document, the criteria or methodology used in the analysis to identify System instability, uncontrolled separation, or Cascading within an Interconnection.

VSL Justifications for TPL-008-1, Requirement R6

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The requirement is new. Therefore, the proposed VSL do not have the unintended consequence of lowering the level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p><u>Guideline 2a</u>: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>The proposed VSLs are not binary and do not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL use the same terminology as used in the associated requirement and are, therefore, consistent with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

VRF Justifications for TPL-008-1, Requirement R7

Proposed VRF	High
NERC VRF Discussion	A VRF of High is appropriate for this requirement. Identifying Contingencies for performing Extreme Temperature Assessments for each of the event categories in Table 1 can directly impact the BES.
FERC VRF G1 Discussion Guideline 1- Consistency with Blackout Report	This VRF is in line with the identified areas from the FERC list of critical areas in the Final Blackout Report.
FERC VRF G2 Discussion Guideline 2- Consistency within a Reliability Standard	This requirement has only a main VRF and no different sub-requirement VRFs.
FERC VRF G3 Discussion Guideline 3- Consistency among Reliability Standards	This VRF is in line with other VRFs that address similar reliability goals in different Reliability Standards.
FERC VRF G4 Discussion Guideline 4- Consistency with NERC Definitions of VRFs	The assigned VRF is consistent with NERC definition of VRFs.
FERC VRF G5 Discussion Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation	This requirement does not mingle a higher risk reliability objective and a lesser risk reliability objective. Therefore, the VRF reflects the risk of the whole requirement.

VSLs for TPL-008-1, Requirement R7

Lower	Moderate	High	Severe
N/A	N/A	<p>The responsible entity, as determined in Requirement R1, identified Contingencies for performing Extreme Temperature Assessment for each of the planning events in Table 1 that are expected to produce more severe System impacts within its planning area, but did not include the rationale for those Contingencies selected for evaluation as supporting documentation.</p>	<p>The responsible entity, as determined in Requirement R1, did not identify Contingencies for performing Extreme Temperature Assessment for each of the planning events in Table 1 that are expected to produce more severe System impacts within its planning area.</p>

VSL Justifications for TPL-008-1, Requirement R7

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The requirement is new. Therefore, the proposed VSL do not have the unintended consequence of lowering the level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p><u>Guideline 2a</u>: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>The proposed VSLs are not binary and do not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL use the same terminology as used in the associated requirement and are, therefore, consistent with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

VRF Justifications for TPL-008-1, Requirement R8

Proposed VRF	High
NERC VRF Discussion	A VRF of High is appropriate due to the importance of performing an Extreme Temperature Assessment every 5 years.
FERC VRF G1 Discussion Guideline 1- Consistency with Blackout Report	This VRF is in line with the identified areas from the FERC list of critical areas in the Final Blackout Report.
FERC VRF G2 Discussion Guideline 2- Consistency within a Reliability Standard	This requirement has only a main VRF and no different sub-requirement VRFs.
FERC VRF G3 Discussion Guideline 3- Consistency among Reliability Standards	This VRF is in line with other VRFs that address similar reliability goals in different Reliability Standards.
FERC VRF G4 Discussion Guideline 4- Consistency with NERC Definitions of VRFs	The assigned VRF is consistent with NERC definition of VRFs.
FERC VRF G5 Discussion Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation	This requirement does not mingle a higher risk reliability objective and a lesser risk reliability objective. Therefore, the VRF reflects the risk of the whole requirement.

VSLs for TPL-008-1, Requirement R8

Lower	Moderate	High	Severe
<p>The responsible entity, as determined in Requirement R1, completed an Extreme Temperature Assessment, but it was performed less than or equal to six months late.</p>	<p>The responsible entity, as determined in Requirement R1, completed an Extreme Temperature Assessment, but it was performed more than six months but less than or equal to 12 months late.</p>	<p>The responsible entity, as determined in Requirement R1, completed an Extreme Temperature Assessment, but it was performed more than 12 months but less than or equal to 18 months late.</p>	<p>The responsible entity, as determined in Requirement R1, performed an Extreme Temperature Assessment, but it was more than 18 months late.</p> <p>OR</p> <p>The responsible entity, as determined in Requirement R1, did not perform an Extreme Temperature Assessment.</p> <p>OR</p> <p>The responsible entity, as determined in Requirement R1, performed an Extreme Temperature Assessment, but it was missing one or more of the required elements in Requirement R8.</p>

VSL Justifications for TPL-008-1, Requirement R8

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The requirement is new. Therefore, the proposed VSL do not have the unintended consequence of lowering the level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p><u>Guideline 2a</u>: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>The proposed VSLs are not binary and do not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL use the same terminology as used in the associated requirement and are, therefore, consistent with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

VRF Justifications for TPL-008-1, Requirement R9

Proposed VRF	High
NERC VRF Discussion	A VRF of High is appropriate for this requirement. Developing a Corrective Action Plan is important to the BES as it assists entities when Systems are unable to meet performance requirements.
FERC VRF G1 Discussion Guideline 1- Consistency with Blackout Report	This VRF is in line with the identified areas from the FERC list of critical areas in the Final Blackout Report.
FERC VRF G2 Discussion Guideline 2- Consistency within a Reliability Standard	This requirement has only a main VRF and no different sub-requirement VRFs.
FERC VRF G3 Discussion Guideline 3- Consistency among Reliability Standards	This VRF is in line with other VRFs that address similar reliability goals in different Reliability Standards.
FERC VRF G4 Discussion Guideline 4- Consistency with NERC Definitions of VRFs	The assigned VRF is consistent with NERC definition of VRFs.
FERC VRF G5 Discussion Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation	This requirement does not mingle a higher risk reliability objective and a lesser risk reliability objective. Therefore, the VRF reflects the risk of the whole requirement.

VSLs for TPL-008-1, Requirement R9

Lower	Moderate	High	Severe
N/A	N/A	<p>The responsible entity, as determined in Requirement R1, developed a Corrective Action Plan meeting each of the elements in Requirement R9, but failed to make their Corrective Action Plan available to, or solicit feedback from, applicable regulatory authorities or governing bodies responsible for retail electric service issues.</p>	<p>The responsible entity, as determined in Requirement R1, failed to develop a Corrective Action Plan meeting each of the elements of Requirement R9 when the benchmark planning case study results indicate the System is unable to meet performance requirements for the Table 1 P0 or P1 Contingencies.</p>

VSL Justifications for TPL-008-1, Requirement R9

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The requirement is new. Therefore, the proposed VSL do not have the unintended consequence of lowering the level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p><u>Guideline 2a</u>: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>The VSL has been assigned as a binary due to the responsible entity either having acceptable criteria for System steady state voltage limits and post-contingency voltage deviations or not.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL use the same terminology as used in the associated requirement and are, therefore, consistent with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

VRF Justifications for TPL-008-1, Requirement R10

Proposed VRF	Lower
NERC VRF Discussion	A VRF of lower has been assigned to Requirement R10. Documenting possible actions to reduce the likelihood or mitigate the consequences and adverse impacts are administrative in nature.
FERC VRF G1 Discussion Guideline 1- Consistency with Blackout Report	This VRF is in line with the identified areas from the FERC list of critical areas in the Final Blackout Report.
FERC VRF G2 Discussion Guideline 2- Consistency within a Reliability Standard	This requirement has only a main VRF and no different sub-requirement VRFs.
FERC VRF G3 Discussion Guideline 3- Consistency among Reliability Standards	This VRF is in line with other VRFs that address similar reliability goals in different Reliability Standards.
FERC VRF G4 Discussion Guideline 4- Consistency with NERC Definitions of VRFs	The assigned VRF is consistent with NERC definition of VRFs.
FERC VRF G5 Discussion Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation	This requirement does not mingle a higher risk reliability objective and a lesser risk reliability objective. Therefore, the VRF reflects the risk of the whole requirement.

VSLs for TPL-008-1, Requirement R10

Lower	Moderate	High	Severe
N/A	N/A	N/A	Each responsible entity, as determined in Requirement R1, failed to evaluate and document possible actions, mitigate the consequences, and adverse impacts when the benchmark planning case study results indicate the System could result in instability, uncontrolled separation, or Cascading for the Table 1 P2, P4, and P7 Contingencies.

VSL Justifications for TPL-008-1, Requirement R10

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The requirement is new. Therefore, the proposed VSL do not have the unintended consequence of lowering the level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p><u>Guideline 2a</u>: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>The VSL has been assigned as a binary due to the fact that the responsible entity will either have evaluated and documented possible actions to mitigate adverse impacts.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL use the same terminology as used in the associated requirement and are, therefore, consistent with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>

VRF Justifications for TPL-008-1, Requirement R11	
Proposed VRF	Medium
NERC VRF Discussion	The VRF of Medium is appropriate because it could directly affect the electrical state or capability of the BES if entities are not aware of the results from its Extreme Temperature Assessment results.
FERC VRF G1 Discussion Guideline 1- Consistency with Blackout Report	This VRF is in line with the identified areas from the FERC list of critical areas in the Final Blackout Report.
FERC VRF G2 Discussion Guideline 2- Consistency within a Reliability Standard	This requirement has only a main VRF and no different sub-requirement VRFs.
FERC VRF G3 Discussion Guideline 3- Consistency among Reliability Standards	This VRF is in line with other VRFs that address similar reliability goals in different Reliability Standards.
FERC VRF G4 Discussion Guideline 4- Consistency with NERC Definitions of VRFs	The assigned VRF is consistent with NERC definition of VRFs.
FERC VRF G5 Discussion Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation	This requirement does not mingle a higher risk reliability objective and a lesser risk reliability objective. Therefore, the VRF reflects the risk of the whole requirement.

VSLs for TPL-008-1, Requirement R11

Lower	Moderate	High	Severe
<p>The responsible entity, as determined in Requirement R1, distributed its Extreme Temperature Assessment results to functional entities having a reliability related need who requested the information in writing, but it was more than 60 days but less than or equal to 80 days following the request.</p>	<p>The responsible entity, as determined in Requirement R1, distributed its Extreme Temperature Assessment results to functional entities having a reliability related need who requested the information in writing, but it was more than 80 days but less than or equal to 100 days following the request.</p>	<p>The responsible entity, as determined in Requirement R1, distributed its Extreme Temperature Assessment results to functional entities having a reliability related need who requested the information in writing, but it was more than 100 days but less than or equal to 120 days following the request.</p>	<p>The responsible entity, as determined in Requirement R1, distributed its Extreme Temperature Assessment results to functional entities having a reliability related need who requested the information in writing, but it was more than 120 days following the request.</p> <p>OR</p> <p>The responsible entity, as determined in Requirement R1, did not distribute its Extreme Temperature Assessment results to functional entities having a reliability related need who requested the information in writing.</p>

VSL Justifications for TPL-008-1, Requirement R11

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The requirement is new. Therefore, the proposed VSL do not have the unintended consequence of lowering the level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties</p> <p><u>Guideline 2a</u>: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p><u>Guideline 2b</u>: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>The proposed VSLs are not binary and do not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL use the same terminology as used in the associated requirement and are, therefore, consistent with the requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Each VSL is based on a single violation and not cumulative violations.</p>