

Non-Substantive VSL Reviews

Standard, Requirement, Category	Requirement Language	Lower	Moderate	High	Severe	Comments
EOP-005-2, R11	Each Transmission Operator, each applicable Transmission Owner, and each applicable Distribution Provider shall provide a minimum of two hours of System restoration training every two calendar years to their field switching personnel identified as performing unique tasks associated with the Transmission Operator’s restoration plan that are outside of their normal tasks.	The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider failed to train 5% or less of the personnel required by Requirement R11 within a two calendar year period.	The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider failed to train more than 5% and up to 10% of the personnel required by Requirement R11 within a two calendar year period.	The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider failed to train more than 10% and up to 15% of the personnel required by Requirement R11 within a two calendar year period.	The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider failed to train more than 15% the personnel required by Requirement R11 within a two calendar year period.	FERC pointed out a typo in the High VSL assignment. NERC agreed that there was a typo and corrected it in the redlined version.
EOP-005-2, R15	Each Generator Operator with a Blackstart Resource shall notify its Transmission	The Generator Operator with a Blackstart Resource did not notify the	The Generator Operator with a Blackstart Resource did not notify the	The Generator Operator with a Blackstart Resource did not notify the	The Generator Operator with a Blackstart Resource did not notify the Transmission	FERC staff pointed out an error in the assignment of

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	Operator of any known changes to the capabilities of that Blackstart Resource affecting the ability to meet the Transmission Operator’s restoration plan within 24 hours following such change.	Transmission Operator of a <u>known</u> change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan within 24 hours but did make the notification within 48 hours.	Transmission Operator of a <u>known</u> change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan within 48 hours but did make the notification within 72 hours.	Transmission Operator of a <u>known</u> change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan within 72 hours but did make the notification within 96 hours.	Operator of a <u>known</u> change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan for more than 96 hours.	intervals. NERC staff made the appropriate change -, <u>and added the word “known” before “change” to match the language in the requirement.</u>
EOP-005-2, R18	Each Generator Operator shall participate in the Reliability Coordinator’s restoration drills, exercises, or simulations as requested by the Reliability Coordinator.	N/A	N/A	N/A	The Generator Operator failed to participate in the Reliability Coordinator’s restoration drills, exercises, or simulations as requested by the Reliability Coordinator.	FERC noted that in the original Filing 2, this set of VSLs was left blank. NERC staff notes that this VSL assignment was inadvertently left out of the original Filing 2 review, but upon further review, staff determined that the intent of the

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						VSL assignment was appropriate. Staff simply updated the language to better reflect the language used in the requirement. (Note that the redline compares the current, in-effect VSL with the new VSL proposed by NERC staff.)
FAC-011-2, R3	The Reliability Coordinator’s methodology for determining SOLs, shall include, as a minimum, a description of the following, along with any reliability margins applied for each:	The Reliability Coordinator’s SOL Methodology includes a description for all but one of the following: R3.1 through R3.7.	The Reliability Coordinator’s SOL Methodology includes a description for all but two of the following: R3.1 through R3.7.	The Reliability Coordinator’s SOL Methodology includes a description for all but three of the following: R3.1 through R3.7.	The Reliability Coordinator’s SOL Methodology is missing a description of four or more of the following: R3.1 through R3.7.	FERC staff pointed out a typo in the Severe VSL: “three” should be “four.” NERC staff made the appropriate change.
FAC-011-2, R3.6	Anticipated transmission system	N/A	N/A	N/A	N/A	FERC staff pointed out that the

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	configuration, generation dispatch and Load level					<p>requirement language for R3.6 read “Not applicable” in Filing 2.</p> <p>NERC staff agreed that this was a mistake and will address the mistake in its supplemental filing to the VSL II filing.</p>
FAC-013-1, R2	The responsible entity failed to provide Transfer Capabilities to more than 5% of the required entities.	The responsible entity failed to provide Transfer Capabilities to more than 5% up to (and including) 10% of the required entities.	The responsible entity failed to provide Transfer Capabilities to more than 10% up to (and including) 15% of the required entities.	The responsible entity failed to provide Transfer Capabilities to more than 15% up to (and including) 20% of the required entities.	The responsible entity failed to provide Transfer Capabilities to more than 20% of the required entities.	<p>FERC staff pointed out typos in the High and Severe VSLs.</p> <p>NERC staff made the appropriate change.</p>