

# Standards Announcement

Revisions to Outstanding Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs)

Formal Comment Period: September 5 – October 19, 2012

Join Ballot Pool for Non-binding Poll: September 5 – October 4, 2012

Non-binding Poll: October 10 – 19, 2012

## [Available Now](#)

Proposed revisions to and/or additional justification for outstanding VRF and VSL assignments have been posted for a 45-day comment period through 8 p.m. ET, Friday, October 19, 2012. Stakeholders may join the ballot pool for this project through 8 a.m. ET October 4, 2012. A 10-day non-binding poll will be held from October 10-19, 2012.

## **Instructions for Commenting**

Please use this [electronic form](#) to submit comments. If you experience any difficulties in using the electronic form, please contact Monica Benson at [monica.benson@nerc.net](mailto:monica.benson@nerc.net). An off-line, unofficial copy of the comment form is posted on the [project page](#).

**Please read carefully:** All stakeholders providing comments (both members of the ballot pool as well as other stakeholders, including groups such as trade associations and committees) must submit comments through the [electronic comment form](#). During the non-binding poll window, balloters who wish to submit opinions with their ballot *may no longer enter comments on the balloting screen*, but may still enter the comments through the [electronic comment form](#). **Balloters who wish to express support for comments submitted by another entity or group will have an opportunity to enter that information and are not required to answer any other questions.**

## **Instructions for Joining Ballot Pool(s)**

Registered Ballot Body members must join the ballot pool to be eligible to provide an opinion in the non-binding poll: [Join Ballot Pool](#)

During the pre-ballot windows, members of the ballot pools may communicate with one another by using their “ballot pool list server.” (Once the non-binding poll begins, ballot pool members are prohibited from using the ballot pool list server.) The ballot pool list server for this non-binding ballot pool is: [bp-Revisions\\_VRFs\\_VSLs\\_in@nerc.com](mailto:bp-Revisions_VRFs_VSLs_in@nerc.com)

The ballot pool is open **through 8 a.m. Eastern on Thursday, October 4, 2012.**

## Next Steps

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

## Background

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

- **Deferred VRFs and VSLs:** Three years ago, sub-requirement VRFs and VSLs were rolled up with main requirement VRFs and VSLs, and new guidelines were issued by FERC and NERC with respect to how VRFs and VSLs are assigned. A few orders approving standards were issued in the midst of this roll-up process, and FERC deferred approval of the VRFs and VSLs associated with those standards until the new VRF/VSL assignment process was formally approved and implemented. FERC has now reviewed those VRFs and VSLs and, in cases where staff found issues that may be correctable (typos and obvious guideline violations) or that require further justification, they have identified those VRFs and VSLs to give NERC staff a chance to review them and modify them before the Commission issues a final order.
- **VSLs from “Filing 2”:** During the VRF and VSL roll-up process, NERC staff identified existing VSLs that needed modification to make them conform to the roll-up or to other aspects of the FERC and NERC guidelines. NERC staff filed those corrections in two big batches: [Filing 1](#) (filed on March 5, 2010 and updated in a [supplemental information filing on March 21, 2011](#)), and [Filing 2](#) (filed on December 1, 2010). As with Filing 1, FERC staff has reviewed Filing 2 and identified VSLs that could require additional work before an order is issued. FERC is giving NERC staff a chance to address those issues now.

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

Additional documentation, including a comprehensive background document with a guide to reviewing the posted documents, is available on the [project page](#). If you have any questions about the project, please contact Mallory Huggins at [mallory.huggins@nerc.net](mailto:mallory.huggins@nerc.net) or (202) 644-8062.

**Standards Process**

The [Standard Processes Manual](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance, please contact Monica Benson,  
Standards Process Administrator, at [monica.benson@nerc.net](mailto:monica.benson@nerc.net) or at 404-446-2560.*

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