

200. Monitor and Assess Short-term Transmission Reliability – Operate within Transmission Limits

The purpose of this standard is to prevent instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system.

201 (a) Requirement

The Reliability Authority (RA) shall monitor (in real time¹) system operating limits (identified to prevent instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system) and the actual real time data² associated with those limits.

201 (b) Measure(s)

1. System operating limits are available in real time
2. Actual real time data is available in a form that can be compared to the system operating limits

201 (c) Outcome(s)

The RA shall monitor real time system operating limits and compare these against actual data associated with those limits.

201 (d) Regional Differences

None identified.

201 (e) Compliance Monitoring Process

The Reliability Authority shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. The Compliance Monitor may also use Periodic Reviews (on site, per a schedule), with Spot Reports/Reviews and Triggered Investigations to assess performance.

The performance-reset period shall be one year. The Reliability Authority shall keep data on limits for three years. The Compliance Monitor shall keep audited data for three years.

The RA shall have the following available upon the request of the Compliance Monitor:

- Real time system operating limits identified
- Display(s) with real time data associated with real time system operating limits

201 (f) Levels of Non-compliance

1. Actual telemetered data needed for monitoring system operating limits unavailable, so surrogate value was monitored for up to 24 hours
2. Actual telemetered data needed for monitoring system operating limits was unavailable, so surrogate data was monitored for up to 48 hours
3. Not Applicable
4. System operating limit(s) were not being compared to actual data

¹ Real time could be continuous analog data or data sampled at a rate greater than or equal to one minute (this sampling rate is compatible with the characteristics of a steam generator and is consistent with the NERC control performance measures.)

² Data may be real, state-estimated or other calculated values

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201 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

202 (a) Requirement

The Transmission Operator (TOP) shall monitor (in real time) the system operating limits (identified to prevent instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system) and the actual real time data associated with those limits.

202(b) Measure(s)

1. System operating limits are available in real time
2. Actual real time data is available in a form that can be compared to the system operating limits

202 (c) Outcome(s)

The TOP shall monitor real time system operating limits and compare these against actual data associated with those limits.

202 (d) Regional Difference(s)

None identified.

202 (e) Compliance Monitoring Process

The TOP shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. The Compliance Monitor may also use Periodic Reviews (on site, per a schedule), with Spot Reports/Reviews and Triggered Investigations to assess performance. The performance reset period shall be one year. The Transmission Operator shall keep data on limits for three years. The Compliance Monitor shall keep audited data for three years.

The TOP shall have the following available upon the request of the Compliance Monitor:

- Real time system operating limits identified
- Display(s) with real time data associated with real time system operating limits

202 (f) Levels of Non-compliance

1. Actual telemetered data needed for monitoring system operating limits unavailable, so surrogate value was monitored for up to 24 hours
2. Actual telemetered data needed for monitoring system operating limits was unavailable, so surrogate data was monitored for up to 48 hours
3. Not Applicable
4. System operating limit(s) were not being compared to actual data

202 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

203 (a) Requirement

The Reliability Authority (RA) shall specify and collect the data it needs [from its associated Balancing Authorities (BAs), Interchange Authorities (IAs), Generators and Transmission Operators (TOPs) and other associated RAs] to maintain the models needed to support real time monitoring and reliability analyses.³

The RA shall specify when to supply data (based on the RA’s hardware and software requirements, and the time needed to do the operational planning analysis.)

The RA shall notify the Compliance Monitor if an RA, BA, IA Generator or TOP does not provide data as requested.

203 (b) Measure(s)

1. Documented specification for data needed to implement changes to existing system models (Specification shall include industry-accepted format, timeframe, and notation that data be technically accurate and complete.)
2. Documented specification for data needed to implement changes for real time monitoring (Specification shall include industry accepted format, timeframe, and notation that data be technically accurate and complete.)
3. Record of correspondence requesting new data needed (for monitoring and reliability analyses) with identification of data not received.

203 (c) Outcome(s)

The RA shall specify and collect the data it needs [from its associated Balancing Authorities (BAs), Interchange Authorities (IAs), Generators and Transmission Operators (TOPs) and other RAs] to maintain the models needed to support real time monitoring and reliability analyses.⁴ The RA shall maintain a record that shows data requested but not received.

203 (d) Regional Difference(s)

None identified.

203 (e) Compliance Monitoring Process

The Reliability Authority shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. The Compliance Monitor may also use Periodic Reviews (on site, per a schedule), with Spot Reports/Reviews and Triggered Investigations to assess performance.

The performance-reset period shall be one year. The Reliability Authority shall keep specification document(s) for three years. The Compliance Monitor shall keep audited data for three years.

The RA shall have available upon request of its Compliance Monitor:

- Specification for data needed to implement changes to existing system models
- Specification for data needed to implement changes for real time monitoring
- Record of correspondence requesting new data needed and indication of data not received

³ Reliability analyses includes both real time and operational planning analyses

⁴ Reliability analyses includes both real time and operational planning analyses

203 (f) Levels of Non-compliance

1. Data specification(s) was not complete (missing either industry accepted format, timeframe or some data technically inaccurate or incomplete)
2. Data was not requested or there was no record of specification
3. Not Applicable
4. Not Applicable

203 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

204 (a) Requirement

The Transmission Operator (TOP) shall specify and collect the data it needs (from its associated Balancing Authorities (BAs), Interchange Authorities (IAs), Generators and Reliability Authority (RA) and other associated TOPs] to maintain the models needed to support real time monitoring and reliability analyses.⁵

The TOP shall specify when to supply data (based on the TOP’s hardware and software requirements, and the time needed to do the operational planning analysis.)

The TOP shall notify the Compliance Monitor if an RA, BA, IA, Generator or TOP does not provide data as requested.

204 (b) Measure(s)

1. Documented specification for data needed to implement changes to existing system models (Specification shall include industry-accepted format, timeframe, and notation that data be technically accurate and complete.)
2. Documented specification for data needed to implement changes for real time monitoring (Specification shall include industry accepted format, timeframe, and notation that data be technically accurate and complete.)
3. Record of correspondence requesting new data needed (for monitoring and reliability analyses) with identification of data not received.

204 (c) Outcome(s)

The TOP shall specify and collect the data it needs [from its associated Balancing Authorities (BAs, Interchange Authorities (IAs), Generators, TOPs and Reliability Authorities (RAs)] to maintain the models needed to support real time monitoring and reliability analyses⁶. The TOP shall maintain a record that shows data requested but not received.

204 (d) Regional Differences

None identified.

205 (e) Compliance Monitoring Process

The TOP shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. The Compliance Monitor may also use Periodic Reviews (on site, per a schedule), with Spot Reports/Reviews and Triggered Investigations to assess performance.

The performance-reset period shall be one year. The TOP shall keep specification document(s) for three years. The Compliance Monitor shall keep audited data for three years.

The TOP shall have available upon request of its Compliance Monitor:

- Specification for data needed to implement changes to existing system models
- Specification for data needed to implement changes for real time monitoring
- Record of correspondence requesting new data needed and identification of data not received

⁵ Reliability analyses includes both real time and operational planning analyses

⁶ Reliability analyses includes both real time and operational planning analyses

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205 (f) Levels of Non-compliance

1. Data specification(s) was not complete (missing either industry accepted format, timeframe or some data technically inaccurate or incomplete)
2. Data was not requested **OR** there was no record of specification
3. Not Applicable
4. Not Applicable

204 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

205 (a) Requirement

The Reliability Authority (RA) shall provide data, as specified, by an (associated) RA and/or Transmission Operator (TOP), no less than 7 days prior to the energization of new facilities or changes to existing facilities

205 (b) (Measure(s))

Provide specified data, as requested (industry accepted format, timeframe, and technically accurate and complete), to requesting RA or TOP, no less than 7 days prior to the energization of new facilities/changes to existing facilities.

205 (c) Outcome(s)

The RA shall provide data as requested, to its (associated) RA and/or TOP.

205 (d) Regional Difference(s)

None identified.

205 (e) Compliance Monitoring Process

The RA shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. The Compliance Monitor shall ask the requesting RA or TOP to confirm the accuracy and timeliness of the data. Performance shall be measured periodically (on site, per a schedule), with triggered investigations and exception reporting.

The compliance-reset period is 12 months without a violation from the time of the last violation. The RA shall provide data to its associated RAs and/or TOP. The RA and/or TOP that requested the data shall keep data for three years.

205 (f) Levels of Non-compliance

1. Not Applicable
2. Not Applicable
3. Not Applicable
4. Data for new/revised facilities was not provided as requested

205 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

206 (a) Requirement

The Balancing Authority (BA) shall provide data, as specified by an (associated) Reliability Authority (RA) and/or Transmission Operator (TOP), no less than 7 days prior to the energization of new facilities or changes to existing facilities

206 (b) Measure(s)

Provide specified data, as requested (industry accepted format, timeframe, and technically accurate and complete), to the requesting RA or TOP, no less than 7 days prior to the energization of new facilities or changes to existing facilities.

206 (c) Outcome(s)

The BA shall provide data, as requested, to its (associated) RA and/or TOP.

206 (d) Regional Differences

None identified.

206 (e) Compliance Monitoring Process

The BA shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. The Compliance Monitor shall ask the requesting RA or TOP to confirm the accuracy and timeliness of the data. Performance shall be measured periodically (on site, per a schedule), with triggered investigations and exception reporting.

The compliance-reset period is 12 months without a violation from the time of the last violation. The BA shall provide data to its associated RA and/or TOP. The RA and/or TOP that requested the data shall keep data for three years.

206 (f) Levels of Non-compliance

1. Not Applicable
2. Not Applicable
3. Not Applicable
4. Data for new/revised facilities was not provided as requested

206 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

207 (a) Requirement

The Interchange Authority (IA) shall provide data, as specified by an (associated) Reliability Authority (RA) and/or Transmission Operator (TOP), no less than 7 days prior to the energization of new facilities or changes to existing facilities

207 (b) Measure(s)

Provide specified data, as requested (industry accepted format, timeframe, and technically accurate and complete), to the requesting RA or TOP, no less than 7 days prior to the energization of new facilities or changes to existing facilities.

207 (c) Outcome(s)

The IA shall provide data, as requested, to its (associated) RA and/or TOP.

207 (d) Regional Difference(s)

None identified.

207 (e) Compliance Monitoring Process

The IA shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. The Compliance Monitor shall ask the requesting RA or TOP to confirm the accuracy and timeliness of the data. Performance shall be measured periodically (on site, per a schedule), with triggered investigations and exception reporting.

The compliance-reset period is 12 months without a violation from the time of the last violation. The IA shall provide data to its associated RA and/ or TOP. The RA and/or TOP that requested the data shall keep data for three years.

207 (f) Levels of Non-compliance

1. Not Applicable
2. Not Applicable
3. Not Applicable
4. Data for new/revised facilities was not provided as requested

207 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

208 (a) Requirement

The Transmission Owner (TOW) shall provide data, as specified by an (associated) Reliability Authority (RA) and/or Transmission Operator (TOP), no less than 7 days prior to the energization of new facilities or changes to existing facilities

208 (b) Measure(s)

Provide specified data, as requested (industry accepted format, timeframe, and technically accurate and complete), to the requesting RA or TOP, no less than 7 days prior to the energization of new facilities or changes to existing facilities.

208 (c) Outcome(s)

The TOW shall provide data, as requested, to its (associated) RA and/or TOP.

208 (d) Regional Difference(s)

None identified.

208 (e) Compliance Monitoring Process

The TOW shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. The Compliance Monitor shall ask the requesting RA or TOP to confirm the accuracy and timeliness of the data. Performance shall be measured periodically (on site, per a schedule), with triggered investigations and exception reporting.

The compliance reset period is 12 months without a violation from the time of the last violation. The TOW shall provide data to its associated RA and/or TOP. The RA and/or TOP that requested the data shall keep data for three years.

208 (f) Levels of Non-compliance

1. Not Applicable
2. Not Applicable
3. Not Applicable
4. Data for new/revised facilities was not provided as requested

208 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

209 (a) Requirement

The Generator Owner shall provide data, as specified by an (associated) Reliability Authority (RA) and/or Transmission Operator (TOP), no less than 7 days prior to the energization of new facilities or changes to existing facilities

209 (b) Measure(s)

Provide specified data, as requested (industry accepted format, timeframe, and technically accurate and complete), to the requesting RA or TOP, no less than 7 days prior to the energization of new facilities or changes to existing facilities.

209 (c) Outcome(s)

The Generator Owner shall provide data, as requested, to its (associated) RA and/or TOP.

209 (d) Regional Difference(s)

None identified.

209 (e) Compliance Monitoring Process

The Generator Owner shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. The Compliance Monitor shall ask the requesting RA or TOP to confirm the accuracy and timeliness of the data. Performance shall be measured periodically (on site, per a schedule), with triggered investigations and exception reporting.

The compliance reset period is 12 months without a violation from the time of the last violation. The Generator Owner shall provide data to its associated RA and/or TOP. The RA and/or TOP that requested the data shall keep data for three years.

209 (f) Levels of Non-compliance

1. Not Applicable
2. Not Applicable
3. Not Applicable
4. Data for new/revised facilities was not provided as requested

209 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

210 (a) Requirement

The Reliability Authority (RA) shall perform reliability analyses to identify where on its system the RA may encounter problems that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system.

210 (b) Measure(s)

Analysis program(s) run(s) when requested and identifies any problems that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system

210 (c) Outcome(s)

The RA shall run reliability analysis program(s) and the program(s) shall identify problems that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system.

210 (d) Regional Difference(s)

None identified

210 (e) Compliance Monitoring Process

The Reliability Authority shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. The Compliance Monitor may also use Periodic Reviews (on site, per a schedule), with Spot Reports/Reviews and Triggered Investigations to assess performance. The performance reset period shall be one year. The Compliance Monitor shall keep audited data for three years.

The RA shall demonstrate that analysis program(s) run(s) when requested by the Compliance Monitor.

210 (f) Levels of Non-compliance

1. Reliability analysis did not run when requested, but ran within 8 hours
2. Reliability analysis did not run when requested, but ran in 8 - 24 hours
3. Reliability analysis did not run when requested, and did not run within 24 hours
4. Not Applicable

210 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

211 (a) Requirement

The Transmission Operator (TOP) shall perform reliability analyses to identify where on its system the TOP may encounter problems that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system.

211 (b) Measure(s)

Analysis program(s) run(s) when requested and identifies any problems that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system

211 (c) Outcome(s)

The TOP shall run reliability analysis program(s) and the program(s) shall identify problems that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system.

211 (d) Regional Difference(s)

None identified.

211 (e) Compliance Monitoring Process

The TOP shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. The Compliance Monitor may also use Periodic Reviews (on site, per a schedule), with Spot Reports/Reviews and Triggered Investigations to assess performance. The performance reset period shall be one year. The Compliance Monitor shall keep audited data for three years.

The TOP shall demonstrate that analysis program(s) run(s) when requested by the Compliance Monitor.

211 (f) Levels of Non-compliance

1. Reliability analysis does not run when requested, but runs within 8 hours
2. Reliability analysis does not run when requested, but runs in 8 - 24 hours
3. Reliability analysis does not run when requested, and does not run within 24 hrs
4. Not Applicable

211 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

212 (a) Requirement

The Reliability Authority (RA) shall use the results of real time monitoring and/or reliability analyses to take actions necessary to prevent/mitigate identified problems that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system.

The RA shall document actions taken.

212 (b) Measure(s)

Documentation showing that actions were taken to prevent/mitigate identified problems that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system.

212 (c) Outcome(s)

The RA shall document actions taken to mitigate/prevent identified problems that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system.

212 (d) Regional Difference(s)

None identified.

212 (e) Compliance Monitoring Process

The Reliability Authority shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. The Compliance Monitor may also use Periodic Reviews (on site, per a schedule), with Spot Reports/Reviews and Triggered Investigations to assess performance. The performance reset period shall be one year. The Compliance Monitor shall keep audited data for three years.

The RA shall have documentation available upon request of the Compliance Monitor that shows that actions were taken when there was an identified problem (that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system.)

212 (f) Levels of Non-compliance

1. Not Applicable
2. Monitoring and/or reliability analyses identified a problem – no actions or incorrect actions were taken but no limit violations occurred
3. Monitoring and/or reliability analyses identified a problem – no actions (or incorrect actions) were taken but no violation occurred
4. System operating limit violated and resulted in instability, uncontrolled separation or cascading outages that adversely impacted the reliability of the bulk transmission system

212 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

213 (a) Requirement

The Transmission Operator (TOP) shall use the results of real time monitoring and/or reliability analyses to take actions necessary to prevent/mitigate identified problems that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system.

The TOP shall document actions taken.

213 (b) Measure(s)

Documentation showing that actions were taken to prevent/mitigate identified problems that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system.

213 (c) Outcome(s)

The TOP shall document actions taken to mitigate/prevent identified problems that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system.

213 (d) Regional Difference(s)

None identified.

213 (e) Compliance Monitoring Process

The TOP shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. The Compliance Monitor may also use Periodic Reviews (on site, per a schedule), with Spot Reports/Reviews and Triggered Investigations to assess performance.

The performance reset period shall be one year. The Compliance Monitor shall keep audited data for three years.

The TOP shall have documentation available upon request of the Compliance Monitor that shows that actions were taken when there was an identified problem (that could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system.)

213 (f) Levels of Non-compliance

1. Not Applicable
2. Monitoring and/or reliability analyses identified a problem – no actions or incorrect actions were taken but no limit violations occurred
3. Monitoring and/or reliability analyses identified a problem – no actions (or incorrect actions) were taken but no violation occurred
4. System operating limit violated and resulted in instability, uncontrolled separation or cascading outages that adversely impacted the reliability of the bulk transmission system

213 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

214 (a) Requirement

The Reliability Authority (RA) shall have a mitigation plan that includes actions to take to prevent and mitigate exceeding system operating limits.

214 (b) Measure(s)

Mitigation plan/procedure(s) that identify actions the RA shall take to remain/return to a state that is within system operating limits.

214 (c) Outcome(s)

The RA shall have a documented, approved mitigation plan that identifies actions to remain/return to within system operating limits. (Note: an emergency operations plan may be used to satisfy this requirement if the emergency operations plan addresses actions to take to prevent exceeding identified system operating limits that, if exceeded, could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system.

214 (d) Regional Difference(s)

None Identified

214 (e) Compliance Monitoring Process

The RA shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. Performance shall be measured periodically (on site, per a schedule), with triggered investigations and spot reporting. The compliance reset period is 12 months. The Reliability Authority shall keep the mitigation plan and/or procedure for three years.

The RA shall provide its mitigation plan and/or procedures to its Compliance Monitor. The Compliance Monitor shall evaluate the mitigation plan and/or procedures.

214 (f) Levels of Non-compliance

1. Mitigation Plan and/or procedure(s) exists but wasn't approved
2. Not Applicable
3. Not Applicable
4. No mitigation plan or procedure exists

214 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

215 (a) Requirement

The Transmission Operator (TOP) shall have a documented mitigation plan that identifies actions to be taken to prevent exceeding an identified system operating limit.

215 (b) Measure(s)

Mitigation plan/procedure(s) that identify actions the TOP shall take to remain/return to a state that is within system operating limits.

215 (c) Outcome(s)

The TOP shall have a documented, approved mitigation plan that identifies actions to remain/return to within system operating limits. (Note: an emergency operations plan may be used to satisfy this requirement if the emergency operations plan addresses actions to take to prevent exceeding identified system operating limits that, if exceeded, could cause instability, uncontrolled separation or cascading outages that adversely impact the reliability of the bulk transmission system.)

215 (d) Regional Difference(s)

None identified.

215 (e) Compliance Monitoring Process

The TOP shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. Performance shall be measured periodically (on site, per a schedule), with triggered investigations and spot reporting. The compliance reset period is 12 months. The TOP shall keep the mitigation plan and/or procedure for three years.

The TOP shall provide its mitigation plan and/or procedures to its Compliance Monitor. The Compliance Monitor shall evaluate the mitigation plan and/or procedures.

215 (f) Levels of Non-compliance

1. Mitigation Plan and/or procedure(s) exists but wan't approved
2. Not Applicable
3. Not Applicable
4. No mitigation plan or procedure exists

215 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

216 (a) Requirement

The Reliability Authority (RA) shall document instances of exceeding identified system operating limits and shall document, log and report on instances where a system operating limit has been exceeded for a specified period of time.

216 (b) Measure(s)

1. Data exists and is retrievable that documents instances of exceeding identified system operating limits
2. Record of violations is in existence for at least three years that identifies violations (instances where a system operating limit has been exceeded for a specified period of time)
3. Complete report filed with applicable Compliance Monitor within 72 hours of exceeding a system operating limit for a specified period of time (includes data and time of event, magnitude and duration of violation, actions taken and explanation of results of actions)

216 (c) Outcome(s)

The RA shall have retrievable information that documents exceeding identified system operating limits. The RA shall have daily operating logs and supporting documentation to show the magnitude and duration of violations (EMS or other source of data). Logs and supporting documentation shall be available for review for at least three years. The RA shall file a complete report (including date and time of event, magnitude and duration of violation, actions taken and explanation of results of actions) with its Compliance Monitor when a defined limit has been exceeded for a specified time period. The report shall be filed within 72 hours of the event.

216 (d) Regional Difference(s)

None identified.

216 (e) Compliance Monitoring Process

The RA shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. Performance shall be measured periodically (on site, per a schedule), with triggered investigations and spot reporting. The compliance reset period is 12 months. The RA shall keep logs and reports for three years.

The RA shall provide the following data when requested by its Compliance Monitor:

- Documentation for all cases where system operating limits were exceeded (usually EMS historical data)
- Daily operating logs and supporting documentation for each system operating limit violation (identified system operating limit exceeded for a specified period of time)
- Complete report indicating event has occurred with description of event

216 (f) Levels of Non-compliance

1. Report filed on time but incomplete
2. Not Applicable
3. One of the following:
 - Logs were available but supporting documentation was unavailable
 - Supporting documentation indicated unlogged violation

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– An incident occurred and there was no report within 72 hours

4. Documentation didn't exist

216 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

217 (a) Requirement

The Transmission Operator (TOP) shall document instances of exceeding identified system operating limits

217 (b) Measure(s)

Data exists and is retrievable

217 (c) Outcome(s)

The TOP shall have retrievable information that documents instances when it exceeded identified system operating limits.

217 (d) Regional Difference(s)

None identified.

217 (e) Compliance Monitoring Process

The TOP shall demonstrate compliance through self-certification with re-certification on a schedule established by the Compliance Monitor. Performance shall be measured periodically (on site, per a schedule), with triggered investigations and spot reporting.

The compliance reset period is 12 months. The TOP shall keep data for three years.

The TOP shall provide its Compliance Monitor with documentation for all cases where system operating limits were exceeded (usually EMS historical data).

217 (f) Levels of Non-compliance

1. Not Applicable
2. Not Applicable
3. Not Applicable
4. Documentation didn't exist

217 (g) Sanctions

Sanctions shall be applied consistent with the NERC Compliance and Enforcement Matrix (*attached at the end of this draft standard for reference and comment.*)

Sanctions Table

The following table is an approved table of Compliance Sanctions. This table of sanctions was developed by the Compliance Subcommittee as part of the NERC Compliance Program and was approved by the NERC Board of Trustees. The SDT does not need to develop new sanctions, but needs to be cognizant of the sanctions that will be applied for the various levels of non-compliance.

Levels of non-compliance are tied to this Enforcement Matrix. The matrix is divided into four levels of increasing non-compliance vertically and the number of violations in a defined period at a given level horizontally.

In the enforcement matrix, note that there are three sanctions that can be used: a letter, a fixed fine, and a \$\$ per MW fine.

Letter

The letter is a sanction used to notify company executives, Regional officers, and regulators when an entity is non-compliance. The distribution of the letter varies depending on the severity of the non-compliance. It is used first to bring non-compliance to light to people who can influence the operation to become compliant.

- Letter (A) - Letter to the entity's Vice President Level or equivalent informing the entity of non-compliance, with copies to the data reporting contact, and the entity's highest ranking Regional Council representative.
- Letter (B) - Letter to the entity's Chief Executive Officer or equivalent, with copies to the data reporting contact, the entity's highest ranking Regional Council representative, and the Vice President over the area in which non-compliance occurred.
- Letter (C) - Letter to the entity's Chief Executive Officer and Chairman of the Board, with copies to the NERC President, regulatory authorities having jurisdiction over the non-compliant entity if requested by such regulatory authorities, the data reporting contact, the entity's highest ranking Regional Council representative, and the Vice President over the area in which non-compliance occurred.

Fixed Dollars

This sanction is used when a letter is not enough and a stronger message is desired. Fixed dollars are typically assigned as a one-time fine that is ideal for measures involving planning-related standards. Many planning actions use forward-looking assumptions. If those assumptions prove wrong in the future, yet they are made in good faith using good practices, entities should not be harshly penalized for the outcome.

Dollars per MW

Dollars per MW sanctions are oriented toward operationally-based standards. The MW can be load, generation, or flow on a line. Reasonableness of a sanction needs to be figured into assessing \$/MW penalties. Assessing large financial penalties is not the goal, but sending a message with proper emphasis on \$\$\$ can be controlled with the multiplier.

Draft Standard 200 – Version A With Each Requirement Listed Separately

Monitor and Assess Short-term Transmission Reliability – Operate within Transmission Limits

Occurrence Period Category	Number of Violations in Occurrence Period at a Given Level			
1 st Period of Violations (Fully Compliant Last Period)	1	2	3	4 or more
2 nd Consecutive Period of Violations		1	2	3 or more
	\$ Sanction from Table; Letter (C) only if Letter (B) previously sent			
3 rd Consecutive Period of Violations			1	2 or more
	\$ Sanction from Table; Letter (C) only if Letter (B) previously sent			
4 th or greater Consecutive Period of Violations				1
	\$ Sanction from Table; Letter (C)			

Level of Non-Compliance	Sanctions Associated with Non-compliance			
Level 1	Letter (A)	Letter (A)	Letter (B) and \$1,000 or \$1 Per MW	Letter (B) and \$2,000 or \$2 Per MW
Level 2	Letter (A)	Letter (B) and \$1,000 or \$1 Per MW	Letter (B) and \$2,000 or \$2 Per MW	Letter (B) and \$4,000 or \$4 Per MW
Level 3	Letter (B) and \$1,000 or \$1 Per MW	Letter (B) and \$2,000 or \$2 Per MW	Letter (B) and \$4,000 or \$4 Per MW	Letter (B) and \$6,000 or \$6 Per MW
Level 4	Letter (B) and \$2,000 or \$2 Per MW	Letter (B) and \$4,000 or \$4 Per MW	Letter (B) and \$6,000 or \$6 Per MW	Letter (B) and \$10,000 or \$10 Per MW

Interpreting the Tables:

- These tables address penalties for violations of the same measure occurring in consecutive compliance reporting periods.
- If a participant has non-compliant performance in consecutive compliance reporting periods, the sanctions applied are more punitive.