NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Violation Risk Factor and Violation Severity Level Assignments

Project 2014-03 Revisions to TOP/IRO Reliability Standards

Violation Risk Factor and Violation Severity Level Assignments

This document provides the Standard Drafting Team's (SDT) justification for assignment of violation risk factors (VRFs) and violation severity levels (VSLs) for each requirement in Project 2014-03.

Each primary requirement is assigned a VRF and a set of one or more VSLs. 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 ERO Sanction Guidelines.

Justification for Assignment of Violation Risk Factors

The SDT applied the following NERC criteria when proposing VRFs for the requirements in Project 2014-03.

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. A planning requirement that is administrative in nature.

The SDT also considered consistency with the FERC Violation Risk Factor Guidelines for setting VRFs:[1]

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

The Commission seeks to ensure that Violation Risk Factors 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:[2]

- 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

The Commission expects a rational connection between the sub-Requirement Violation Risk Factor assignments and the main Requirement Violation Risk Factor assignment.

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[1] North American Electric Reliability Corp., 119 FERC ¶ 61,145, order on rehearing and compliance filing, 120 FERC ¶ 61,145 (2007) ("VRF Rehearing Order").

[2] Id. at footnote 15.

Guideline (3) — Consistency among Reliability Standards

The Commission expects the assignment of Violation Risk Factors 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 Violation Risk Factor 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.

The following discussion addresses how the SDT considered FERC's VRF Guidelines 2 through 5. The team did not address Guideline 1 directly because of an apparent conflict between Guidelines 1 and 4. Whereas Guideline 1 identifies a list of topics that encompass nearly all topics within NERC's Reliability Standards and implies that these requirements should be assigned a "High" VRF, Guideline 4 directs assignment of VRFs based on the impact of a specific requirement to the reliability of the system. The SDT believes that Guideline 4 is reflective of the intent of VRFs in the first instance and therefore concentrated its approach on the reliability impact of the requirements.

There are twenty requirements in proposed TOP-001-3. None of the twenty requirements were assigned a "Lower" VRF. Requirements R9 and R15 were assigned a "Medium" VRF while all of the other requirements were given a "High" VRF.

VRF for Proposed TOP-001-3, Requirement R1:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements so only one VRF was assigned. Therefore, there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved TOP-001-1a that is assigned a High VRF. The requirements are viewed as similar since they both refer to taking action to ensure reliability. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to take action, or to direct others to take action, could directly affect the electrical state or the capability of the bulk power system and could lead to bulk power system instability, separation, or Cascading failures. Therefore, this requirement is assigned a High VRF.

- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R1 contains only one objective, therefore only one VRF was assigned.

VRF for Proposed TOP-001-3, Requirement R2:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved TOP-001-1a that is assigned a High VRF. The requirements are viewed as similar since they both refer to taking action to ensure reliability: approved TOP-001-1a for a Transmission Operator and proposed TOP-001-3 for a Balancing Authority. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to take action, or to direct others to take action, could directly affect the electrical state or the capability of the bulk power system and could lead to bulk power system instability, separation, or Cascading failures. Therefore, this requirement is assigned a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R2 contains only one objective, therefore only one VRF was assigned.

VRF for Proposed TOP-001-3, Requirement R3:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R3) in approved TOP-001-1a that is assigned a High VRF. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to comply with issued Operating Instructions could lead to bulk power system instability, separation, or Cascading failures. Thus, this requirement meets the criteria for a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R3 contains only one objective, therefore only one VRF was assigned.

VRF for Proposed TOP-001-3, Requirement R4:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.

- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R3) in approved TOP-001-1a that is assigned a High VRF. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to comply with issued Operating Instructions could lead to bulk power system instability, separation, or Cascading failures. Thus, this requirement meets the criteria for a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R4 has only one objective, therefore only one VRF was assigned.

VRF for Proposed TOP-001-3, Requirement R5:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. This is a new requirement. However, there is a similar requirement (Requirement R4) in approved TOP-001-1a that is assigned a High VRF. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to comply with issued Operating Instructions could lead to bulk power system instability, separation, or Cascading failures. Thus, this requirement meets the criteria for a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R5 contains only one objective. Therefore only one VRF was assigned.

VRF for Proposed TOP-001-3, Requirement R6:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. This is a new requirement. However, there is a similar requirement (Requirement R4) in approved TOP-001-1a that is assigned a High VRF. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to comply with issued Operating Instructions could lead to bulk power system instability, separation, or Cascading failures. Thus, this requirement meets the criteria for a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R6 contains only one objective. Therefore only one VRF was assigned to the requirement.

VRF for Proposed TOP-001-3, Requirement R7:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (requirement R6) in approved TOP-001-1a which is assigned a High VRF. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to provide requested assistance could lead to bulk power system instability, separation, or Cascading failures. Thus, this requirement meets the criteria for a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R7 addresses a single objective and has a single VRF.

VRF for Proposed TOP-001-3, Requirement R8:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R7) in approved TOP-001-1a that is assigned a High VRF. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to inform other known impacted reliability entities of actions that may result in Emergencies could lead to bulk power system instability, separation, or Cascading failures. Thus, this requirement meets the criteria for a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R8 addresses a single objective and has a single VRF.

VRF for Proposed TOP-001-3, Requirement R9:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R3) in approved TOP-003-1 which is assigned a Medium VRF. Hence, this requirement is also assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Bulk power system instability, separation, or Cascading failures are not likely to occur due to a failure to adhere to this requirement. Thus, this requirement meets the criteria for a Medium VRF.

- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R9 addresses a single objective and has a single VRF.

VRF for Proposed TOP-001-3, Requirement R10:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. This is a new requirement. However, there is a similar requirement (Requirement R4) in ~~proposed~~approved IRO-002-~~4~~2 that is assigned a High VRF. Hence, this requirement is also assigned a High VRF. The requirements are considered similar as ~~proposed~~approved IRO-002-~~4~~2, Requirement R4 is for Reliability Coordinators while proposed TOP-001-3, Requirement R10 is for Transmission Operators.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to monitor Facilities~~,~~ and the status of Special Protection Systems~~, and sub-100 kV facilities~~ within the Transmission Operator's Area and to obtain data outside of the Transmission Operator's Area for Facilities and status of Special Protection Systems identified as necessary by the Transmission Operator, could lead to bulk power system instability, separation, or Cascading failures. Thus, this requirement meets the criteria for a High VRF.
- FERC's Guideline 5 - Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R10 addresses a single objective and has a single VRF.

VRF for Proposed TOP-001-3, Requirement R11:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. This is a new requirement. However, there is a similar requirement (Requirement R4) in approved IRO-002-~~4~~2 that is assigned a High VRF. Hence, this requirement is also assigned a High VRF. The requirements are considered similar as ~~proposed~~approved IRO-002-~~4~~2, Requirement R4 is for Reliability Coordinators while proposed TOP-001-3, Requirement R11 is for the Balancing Authority.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to monitor ~~facilities~~ the status of Special Protection Systems that impact generation or Load could lead to bulk power system instability, separation, or Cascading failures. Thus, this requirement meets the criteria for a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R11 addresses a single objective and has a single VRF.

VRF for Proposed TOP-001-3, Requirement R12:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved TOP-004-2 which has a High VRF. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to operate within IROL T_V could lead to bulk power system instability, separation, or Cascading failures. Thus, this requirement meets the criteria for a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R12 addresses a single objective and has a single VRF.

VRF for Proposed TOP-001-3, Requirement R13:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. This is a new requirement. However, there is a similar requirement (Requirement R2) in approved IRO-008-1 that is assigned a High VRF. Hence, this requirement is also assigned a High VRF. The requirements are considered similar as approved IRO-008-1, Requirement R2 is for Reliability Coordinators while proposed TOP-001-3, Requirement R13 is for the Transmission Operator.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to ensure Real-time Assessments are performed at least every 30 minutes could lead to bulk power system instability, separation, or Cascading failures. Thus, this requirement meets the criteria for a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R13 addresses a single objective and has a single VRF.

VRF for Proposed TOP-001-3, Requirement R14:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved TOP-004-2 which has a High VRF. Hence, this requirement is also assigned a High VRF.

- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to initiate the Operating Plan could lead to bulk power system instability, separation, or Cascading failures. Thus, this requirement meets the criteria for a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R14 addresses a single objective and has a single VRF.

VRF for Proposed TOP-001-3, Requirement R15:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved TOP-007-0 that is assigned a High VRF. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to inform the Reliability Coordinator of actions taken to return the system to within limits could lead to bulk power system instability, separation, or Cascading failures. Thus, this requirement meets the criteria for a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R15 addresses a single objective and has a single VRF.

VRF for Proposed TOP-001-3, Requirement R16:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R8) in approved IRO-002-2 that is assigned a High VRF. Hence, this requirement is also assigned a High VRF. The requirements are considered similar as approved IRO-002-2, Requirement R8 is for Reliability Coordinators while proposed TOP-001-3, Requirement R16 is for the Transmission Operator.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to provide operators with authority to approve outages and maintenance of monitoring, telecommunication, and analysis capabilities could lead to bulk power system instability, separation, or Cascading failures. Thus, this requirement meets the criteria for a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R16 addresses a single objective and has a single VRF.

VRF for Proposed TOP-001-3, Requirement R17:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R8) in approved IRO-002-2 that is assigned a High VRF. Hence, this requirement is also assigned a High VRF. The requirements are considered similar as approved IRO-002-2, Requirement R8 is for Reliability Coordinators while proposed TOP-001-3, Requirement R17 is for the Balancing Authority.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to provide operators with authority to approve outages and maintenance of monitoring, telecommunications, and analysis capabilities could lead to bulk power system instability, separation, or Cascading failures. Thus, this requirement meets the criteria for a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R17 addresses a single objective and has a single VRF.

VRF for Proposed TOP-001-3, Requirement R18:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R5) in approved IRO-009-1 that is assigned a High VRF. The requirements are considered similar since approved IRO-009-1 is about the Reliability Coordinator and proposed TOP-001-3, Requirement R18 is about the Transmission Operator. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to operate to the most limiting parameter when there is a difference in SOLs could lead to bulk power system instability, separation, or Cascading failures. Thus, this requirement meets the criteria for a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R18 addresses a single objective and has a single VRF.

VRF for Proposed TOP-001-3, Requirement R19:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.

- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved IRO-002-2 that is assigned a High VRF. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to have data exchange capability could lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R19, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed TOP-001-3, Requirement R20:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved IRO-002-2 that is assigned a High VRF. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to have data exchange capability could lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-001-3, Requirement R20, contains only one objective; therefore, only one VRF was assigned.

There are seven requirements in proposed TOP-002-4. All of the requirements were assigned a Medium VRF.

VRF for Proposed TOP-002-4, Requirement R1:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements, so only one VRF was assigned; therefore, there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved TOP-002-2.1b that is assigned a Medium VRF. Hence, this requirement is also assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. This is an advanced planning requirement. So while not having an Operational Planning Analysis could hinder the Transmission Operator, in and of itself it does not directly affect the electrical state or the capability of the bulk

power system and would not directly lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Medium VRF.

- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-002-4, Requirement R1, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed TOP-002-4, Requirement R2:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved TOP-002-2.1b that is assigned a Medium VRF. Hence, this requirement is also assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. This is an operational planning requirement. So in and of itself, it does not directly affect the electrical state or the capability of the bulk power system and would not directly lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Medium VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-002-4, Requirement R2, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed TOP-002-4, Requirement R3:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R4) in approved TOP-002-2.1b that is assigned a Medium VRF. Hence, this requirement is also assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to notify other impacted reliability entities of their roles does not, in and of itself, lead to bulk power system instability, separation or Cascading failures. This is an advance planning requirement, not Real-time. The Transmission Operator still retains the operating requirements to preclude operating in exceedances of established limits. Thus, this requirement meets the criteria for a Medium VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-002-4, Requirement R3, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed TOP-002-4, Requirement R4:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved TOP-002-2.1b that is assigned a Medium VRF. Hence, this requirement is also assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. This is an operational planning requirement. So in and of itself, it does not directly affect the electrical state or the capability of the bulk power system and would not directly lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Medium VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-002-4, Requirement R4, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed TOP-002-4, Requirement R5:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R4) in approved TOP-002-2.1b that is assigned a Medium VRF. Hence, this requirement is also assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to notify other impacted reliability entities of their roles does not, in and of itself, lead to bulk power system instability, separation or Cascading failures. This is an advance planning requirement, not Real-time. Thus, this requirement meets the criteria for a Medium VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-002-4, Requirement R5, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed TOP-002-4, Requirement R6:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. This is a new requirement with no similar requirement to compare against. However, it is a coordination issue in the operational planning timeframe and so is being treated in a similar fashion to the other requirements in this standard. Hence, this requirement is assigned a Medium VRF.

- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to submit the Operating Plan for next-day operations cannot, in and of itself, lead to bulk power system instability, separation or Cascading failures. This is an advance planning requirement, not Real-time. Thus, this requirement meets the criteria for a Medium VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-002-4, Requirement R6, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed TOP-002-4, Requirement R7:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. This is a new requirement with no similar requirement to compare against. However, it is a coordination issue in the operational planning timeframe and so is being treated in a similar fashion to the other requirements in this standard. Hence, this requirement is assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to submit the Operating Plan for next-day operations cannot, in and of itself, lead to bulk power system instability, separation or Cascading failures. This is an advance planning requirement, not Real-time. Thus, this requirement meets the criteria for a Medium VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-002-4, Requirement R7, contains only one objective; therefore, only one VRF was assigned.

There are five requirements in proposed TOP-003-3. Four of the five requirements were assigned a "Low" VRF: Requirements R1, R2, R3, and R4. Requirement R5 was assigned a "Medium" VRF.

VRF for Proposed TOP-003-3, Requirement R1:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements, so only one VRF was assigned; therefore, there is no conflict.
- FERC's Guideline 3 — Consistency among reliability standards. There is a similar requirement (Requirement R1) in approved IRO-010-1a that is also assigned a Low VRF. The requirements are viewed as similar since they both refer to data specifications: approved IRO-010-1a for a Reliability Coordinator, and proposed TOP-003-3 for a Transmission Operator.

- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to compile a data specification does not relieve a Transmission Operator from its responsibility to reliably operate the bulk power system, so this requirement, in and of itself, is administrative in nature and does not directly affect the electrical state or the capability of the bulk power system, and will not lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Low VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-003-3, Requirement R1, contains only one objective; therefore only one VRF was assigned.

VRF for Proposed TOP-003-3, Requirement R2:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved IRO-010-1a that is assigned a Low VRF. The requirements are viewed as similar since they both refer to data specifications: approved IRO-010-1a for a Reliability Coordinator, and proposed TOP-003-3 for a Balancing Authority.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to distribute the data specification does not relieve a Balancing Authority from its responsibility to reliably operate the bulk power system, so this requirement, in and of itself, is administrative in nature and does not directly affect the electrical state or the capability of the bulk power system, and will not lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Low VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-003-3, Requirement R2, contains only one objective, therefore only one VRF was assigned.

VRF for Proposed TOP-003-3, Requirement R3:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R2) in approved IRO-010-1a that is assigned a Low VRF. The requirements are viewed as similar since they both refer to the distribution of the data specification: approved IRO-010-1a for a Reliability Coordinator and proposed TOP-003-3, Requirement R3 for a Transmission Operator.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to distribute the data specification does not relieve a Transmission Operator from its responsibility to reliably operate the

bulk power system, so this requirement, in and of itself, is administrative in nature and does not directly affect the electrical state or the capability of the bulk power system, and will not lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Lower VRF.

- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-003-3, Requirement R3, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed TOP-003-3, Requirement R4:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R2) in approved IRO-010-1a that is assigned a Low VRF. The requirements are viewed as similar since they both refer to the distribution of the data specification: approved IRO-010-1a for a Reliability Coordinator, and proposed TOP-003-3 for a Balancing Authority.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to distribute the data specification does not relieve a Balancing Authority from its responsibility to reliably operate the bulk power system, so this requirement, in and of itself, is administrative in nature and does not directly affect the electrical state or the capability of the bulk power system, and will not lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Low VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-003-3, Requirement R4, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed TOP-003-3, Requirement R5:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R3) in approved IRO-010-1a that is assigned a Medium VRF. The requirements are viewed as similar since they both refer to the provision of data: approved IRO-010-1 for a Reliability Coordinator, and proposed TOP-003-3 for a Transmission Operator and Balancing Authority.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to provide the data requested does not, in and of itself, directly affect the electrical state or the capability of the bulk power system, and will not lead to bulk power system instability, separation, or Cascading failures. However, it greatly increases the likelihood of such problems and, therefore, this requirement is assigned a Medium VRF.

- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed TOP-003-3, Requirement R5, has only one objective; therefore, only one VRF was assigned.

There are three requirements in proposed IRO-001-4. All of the requirements were assigned a "High" VRF.

VRF for Proposed IRO-001-4, Requirement R1:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R3) in approved IRO-001-1.1 that is assigned a High VRF. The requirements are viewed as similar since they both refer to taking actions to preserve reliability.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to act, or direct others to act, could lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-001-4, Requirement R1, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-001-4, Requirement R2:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R8) in approved IRO-001-1.1 that is assigned a High VRF. Therefore, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to comply with Operating Instructions could lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-001-4, Requirement R2, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-001-4, Requirement R3:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R8) in approved IRO-001-1.1 that is assigned a High VRF. Therefore this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to inform the Reliability Coordinator of the inability to follow an Operating Instruction could lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-001-4, Requirement R3, contains only one objective; therefore, only one VRF was assigned.

There are four requirements in proposed IRO-002-4. All of the requirements were assigned a "High" VRF.

VRF for Proposed IRO-002-4, Requirement R1:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved IRO-002-2 that is assigned a High VRF. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to have data exchange capabilities could lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-002-4, Requirement R1, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-002-4, Requirement R2:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R8) in approved IRO-002-2 that is assigned a High VRF. Hence, this requirement is also assigned a High VRF.

- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to give operators the authority to approve planned outages and maintenance of telecommunication, monitoring and analysis capabilities could lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-002-4, Requirement R2, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-002-4, Requirement R3:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved IRO-003-2 that is assigned a High VRF. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to monitor Facilities, the status of Special Protection Systems, and sub-100 kV facilities identified as necessary by the Reliability Coordinator, could lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-002-4, Requirement R3, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-002-4, Requirement R4:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R4) in approved IRO-002-2 that is assigned a High VRF. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to have adequate monitoring systems with emphasis on cited criteria could lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-002-4, Requirement R4, contains only one objective; therefore, only one VRF was assigned.

There are six requirements in proposed IRO-008-2. Four of the six requirements were assigned a "Medium" VRF: Requirements R1, R2, R3, and R6. The other requirements were assigned a "High" VRF.

VRF for Proposed IRO-008-2, Requirement R1:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved IRO-008-1 that is assigned a Medium VRF. Hence, this requirement is also assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to perform an Operational Planning Analysis in the operational planning timeframe, in and of itself, does not directly affect the electrical state or the capability of the bulk power system, and will not lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Medium VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-008-2, Requirement R1, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-008-2, Requirement R2:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. This is a new requirement and there are no comparable requirements to compare against. It is a coordination requirement in the operational planning timeframe so this requirement is assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to coordinate an Operating Plan in the operational planning timeframe, in and of itself, does not directly affect the electrical state or the capability of the bulk power system, and will not lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Medium VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-008-2, Requirement R2, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-008-2, Requirement R3:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R3) in approved IRO-008-1 that is assigned a Medium VRF. Hence, this requirement is also assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to notify entities of roles in Operating Plans in the operational planning timeframe, in and of itself, does not directly affect

the electrical state or the capability of the bulk power system, and will not lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Medium VRF.

- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-008-2, Requirement R3, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-008-2, Requirement R4:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R2) in approved IRO-008-1 that is assigned a High VRF. Hence, this requirement is also assigned a High VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to ensure that a Real-time Assessment is performed at least once every 30 minutes could lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-008-2, Requirement R4, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-008-2, Requirement R5:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R3) in approved IRO-008-1 that is assigned a Medium VRF. However, that requirement combines operations planning and Real-time. This requirement only applies to Real-time which in the belief of the SDT raises the VRF to High.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to notify impacted entities of roles in plans in the Real-time environment could lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-008-2, Requirement R5, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-008-2, Requirement R6:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.

- FERC's Guideline 3 — Consistency among Reliability Standards. This is a new requirement. However, it is similar to proposed TOP-001-3, Requirement R15 which is assigned a Medium VRF. The requirements are similar in that proposed IRO-008-2, Requirement R8 is for Reliability Coordinators while proposed TOP-001-3 is for Transmission Operators. Hence, this requirement is also assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to notify impacted entities of when exceedances have been mitigated will not lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Medium VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-008-2, Requirement R6, contains only one objective; therefore, only one VRF was assigned.

There are three requirements in proposed IRO-010-2. Two of the requirements, Requirements R1 and R2, are assigned "Low" VRFs. Requirement R3 is assigned a "Medium" VRF.

VRF for Proposed IRO-010-2, Requirement R1:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved IRO-010-1a that is assigned a Low VRF. Hence, this requirement is also assigned a Low VRF. This is also consistent with proposed TOP-003-3, Requirement R1.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to distribute the data specification does not, in and of itself, lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Low VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-010-2, Requirement R1, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-010-2, Requirement R2:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R2) in approved IRO-010-1a that is assigned a Low VRF. Hence, this requirement is also assigned a Low VRF. This is also consistent with proposed TOP-003-3, Requirement R2.

- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to distribute the data specification does not, in and of itself, lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Low VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-010-3, Requirement R2, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-010-2, Requirement R3:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R3) in approved IRO-010-1a that is assigned a Medium VRF. Hence, this requirement is also assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to supply the data requested does not, in and of itself, lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Medium VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-010-2, Requirement R3, contains only one objective; therefore, only one VRF was assigned.

There are seven requirements in proposed IRO-014-3. Four of the requirements, Requirements R4, R5, R6, and R7, were assigned a "High" VRF. Requirements R1 and R3 were assigned a "Medium" VRF. Requirement R2 was assigned a "Low" VRF.

VRF for Proposed IRO-014-3, Requirement R1:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved IRO-014-1 that is assigned a Medium VRF. Hence, this requirement is also assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to have and implement the plans and procedures, in and of itself, will not lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Medium VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-014-3, Requirement R1, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-014-3, Requirement R2:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. This is a new requirement with no comparable requirement that is assigned a Low VRF. The requirement is for maintenance of plans, processes, and procedures. Hence, the designation of a Low VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to maintain the plans, processes, and procedures is administrative in nature and does not directly affect the electrical state or the capability of the bulk power system, and will not lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Low VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-014-3, Requirement R2, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-014-3, Requirement R3:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved IRO-016-1 that is assigned a Medium VRF. Hence, this requirement is also assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to notify other Reliability Coordinators, in and of itself, will not lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Medium VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-014-3, Requirement R3, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-014-3, Requirement R4:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1.2) in approved IRO-016-1 that is assigned a Medium VRF. Upon reviewing the requirement, the SDT believes that it needs to be elevated to a High VRF since it is dealing with actions taken to operate during a possible Emergency situation in Real-time.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to operate as if the Emergency exists while the situation needs to be resolved could lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a High VRF.

- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-014-3, Requirement R4, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-014-3, Requirement R5:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1) in approved IRO-016-1 that is assigned a Medium VRF. Upon reviewing the requirement, the SDT believes that it needs to be elevated to a High VRF since it is dealing with actions taken to operate during a possible Emergency situation in Real-time.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to operate as if the Emergency exists while the situation needs to be resolved could lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-014-3, Requirement R5, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-014-3, Requirement R6:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R1.1) in approved IRO-016-1 that is assigned a Medium VRF. Upon reviewing the requirement, the SDT believes that it needs to be elevated to a High VRF since it is dealing with actions taken to operate during a possible Emergency situation in Real-time.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to operate as if the Emergency exists while the situation needs to be resolved could lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-014-3, Requirement R6, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-014-3, Requirement R7:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. This is a new requirement. However, it is similar to proposed TOP-001-3, Requirement R7 which has a High VRF assignment.

The requirements are similar in that proposed TOP-001-3, Requirement R7 is for Transmission Operators and Balancing Authorities while proposed IRO-014-3, Requirement R9 is for Reliability Coordinators. Hence, this requirement is also assigned a High VRF.

- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to provide requested assistance could lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a High VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-014-3, Requirement R7, contains only one objective; therefore, only one VRF was assigned.

There are four requirements in proposed IRO-017-1. All four of the requirements have been assigned a "Medium" VRF.

VRF for Proposed IRO-017-1, Requirement R1:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R6) in proposed IRO-005-3.1a that is assigned a Medium VRF. Hence, this requirement is also assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to have a coordination process, in and of itself in the planning timeframe, will not lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Medium VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-017-1, Requirement R1, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-017-1, Requirement R2:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. This is a new requirement with no comparable requirement that is assigned a Medium VRF. The requirement is for following the process described in proposed IRO-017-1, Requirement R1 which is assigned a Medium VRF. Hence, the designation of a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to follow the process, in and of itself in the planning timeframe, will not lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Medium VRF.

- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-017-1, Requirement R2, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-017-1, Requirement R3:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R8) in approved TPL-001-4 that is assigned a Medium VRF. Hence, this requirement is also assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to distribute the assessments, in and of itself in the planning timeframe, will not lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Medium VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-017-1, Requirement R3, contains only one objective; therefore, only one VRF was assigned.

VRF for Proposed IRO-017-1, Requirement R4:

- FERC's Guideline 2 — Consistency within a Reliability Standard. The requirement has no sub-requirements; only one VRF was assigned, so there is no conflict.
- FERC's Guideline 3 — Consistency among Reliability Standards. There is a similar requirement (Requirement R6) in proposed IRO-005-3.1a that is assigned a Medium VRF. Hence, this requirement is also assigned a Medium VRF.
- FERC's Guideline 4 — Consistency with NERC's Definition of a VRF. Failure to coordinate solutions, in and of itself in the planning timeframe, will not lead to bulk power system instability, separation, or Cascading failures; therefore, this requirement is assigned a Medium VRF.
- FERC's Guideline 5 — Treatment of Requirements that Co-mingle More Than One Objective. Proposed IRO-017-1, Requirement R4, contains only one objective; therefore, only one VRF was assigned.

Justification for Assignment of Violation Severity Levels:
In developing the VSLs for the TOP/IRO standards, the SDT anticipated the evidence that would be reviewed during an audit, and developed its VSLs based on the noncompliance an auditor may find during a typical audit. The SDT based its assignment of VSLs on the following NERC criteria:

Lower	Moderate	High	Severe
Missing a minor element (or a small percentage) of the required performance. The performance or product measured has significant value, as it almost meets the full intent of the requirement.	Missing at least one significant element (or a moderate percentage) of the required performance. The performance or product measured still has significant value in meeting the intent of the requirement.	Missing more than one significant element (or is missing a high percentage) of the required performance, or is missing a single vital component. The performance or product has limited value in meeting the intent of the requirement.	Missing most or all of the significant elements (or a significant percentage) of the required performance. The performance measured does not meet the intent of the requirement, or the product delivered cannot be used in meeting the intent of the requirement.

FERC's VSL guidelines are presented below, followed by an analysis of whether the VSLs proposed for each requirement 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 noncompliance and avoid significant changes that may encourage a lower level of compliance than was required when levels of noncompliance 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 noncompliance 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.

VSLs for Proposed TOP-001-3, Requirement R1:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R1.	Meets NERC's VSL guidelines – Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The most comparable VSL for a similar requirement is for the approved TOP-001-1a, Requirement R1. While similar, that requirement is not exactly the same as it had two clearly different objects. One of the objects has more to do with actions than the other and that part of the VSL is binary Severe. Therefore, the SDT assigned a binary Severe VSL to this requirement.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R2:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R2.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The most comparable VSL for a similar requirement is for the approved TOP-001-1a, Requirement R1. While similar, that requirement is not exactly the same as it had two clearly different objects. One of the objects has more to do with actions than the other and that part of the VSL is Severe. Therefore, the SDT assigned a binary Severe VSL to this requirement.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R3:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R3.	Meets NERC's VSL guidelines – Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The most comparable VSL for a similar requirement is for the approved TOP-001-1a, Requirement R3. Those VSLs are binary Severe. Therefore, the SDT assigned a binary Severe VSL to this requirement.	The proposed VSLs do not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSLs use the same terminology as used in the associated requirement, and are, therefore, consistent with the requirement.	The VSLs are based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R4:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R4.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The most comparable VSL for a similar requirement is for the approved TOP-001-1a, Requirement R3. Those VSLs are binary Severe. Therefore, the SDT assigned a binary Severe VSL to this requirement.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R5:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R5.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The most comparable VSLs for a similar requirement are for the approved TOP-001-1a, Requirement R4. Those VSLs are binary Severe. Therefore, the SDT assigned a binary Severe VSL to this requirement.	The proposed VSLs do not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSLs use the same terminology as used in the associated requirement, and are, therefore, consistent with the requirement.	The VSLs are based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R6:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R6.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The most comparable VSLs for a similar requirement are for the approved TOP-001-1a, Requirement R4. Those VSLs are binary Severe. Therefore, the SDT assigned a binary Severe VSL to this requirement.	The proposed VSLs do not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSLs use the same terminology as used in the associated requirement, and are, therefore, consistent with the requirement.	The VSLs are based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R7:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R7.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The proposed requirement is similar to approved TOP-001-1a, Requirement R6. Those VSLs are binary Severe. Therefore, the SDT assigned a binary Severe VSL to this requirement.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for TOP-001-2 Requirement R8:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R8.	Meets NERC's VSL guidelines. There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	The most comparable VSLs for a similar requirement are for the approved TOP-001-1a, Requirement R7. Those VSLs are binary Severe. However, when assigning the VSLs for this requirement, the SDT believed that it was possible to provide a gradual increasing scale for the VSLs and assigned the VSLs appropriately.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R9:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R9.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	The most comparable VSLs for a similar requirement are those for proposed TOP-003-1, Requirement R3. Those VSLs are binary Severe. However, when assigning the VSL for the new requirement, the SDT believed that it was possible to provide a gradual increasing scale for the VSL and assigned the VSLs appropriately.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R10:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R10.	Meets NERC's VSL guidelines - ~~Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.~~ There is an incremental aspect to the violation and the VSLs follow the guidelines for	The most comparable VSLs for a similar requirement are for the ~~proposed~~approved IRO-002-2, Requirement R4. Those VSLs are ~~binary Severe~~incremental. Therefore, the SDT assigned ~~a binary Severe~~ incremental VSLs to this requirement.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
	incremental violations.				

VSLs for Proposed TOP-001-3, Requirement R11:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R11.	Meets NERC's VSL guidelines - ~~Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance~~ There is an incremental aspect to the violation and the VSLs follow the guidelines for	The most comparable VSLs for a similar requirement are for the ~~proposed~~approved IRO-002-2, Requirement R4. Those VSLs are ~~binary Severe~~incremental. Therefore, the SDT assigned ~~a binary Severe~~ incremental VSLs to this requirement.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
	incremental violations.				

VSLs for Proposed TOP-001-3, Requirement R12:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R12.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance	The most comparable VSLs for a similar requirement are for the approved TOP-004-2, Requirement R1. Those VSLs are binary Severe. Therefore, the SDT assigned a binary Severe VSL to this requirement.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R13:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R13.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	The most comparable VSLs for a similar requirement are for the approved IRO-008-1, Requirement R2. Those VSLs are gradated based on missing the timing requirement. Therefore, the SDT assigned gradated VSLs to this requirement on the same basis.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R14:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R14.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance	The most comparable VSLs for a similar requirement are for the approved TOP-004-2, Requirement R1. Those VSLs are binary Severe. Therefore, the SDT assigned a binary Severe VSL to this requirement.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R15:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R15.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance	The most comparable VSLs for a similar requirement are for the approved TOP-007-0, Requirement R1. Those VSLs are gradated based on delivering an incomplete message. The SDT believed that the message needed to be complete to preserve reliability. Therefore, the SDT assigned a binary Severe VSL to this requirement.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R16:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R16.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance	The most comparable VSLs for a similar requirement are for the approved IRO-002-2, Requirement R8. Those VSLs are gradated based on splitting up the different approval rights. The SDT did not believe that there was any value to reliability by splitting up the approval rights. Therefore, the SDT assigned a binary Severe VSL to this requirement.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R17:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R17.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance	The most comparable VSLs for a similar requirement are for the approved IRO-002-2, Requirement R8. Those VSLs are gradated based on splitting up the different approval rights. The SDT did not believe that there was any value to reliability by splitting up the approval rights. Therefore, the SDT assigned a binary Severe VSL to this requirement.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R18:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R18.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance	The most comparable VSLs for a similar requirement are for the approved IRO-009-1, Requirement R5. Those VSLs are binary Severe. Therefore, the SDT assigned a binary Severe VSL to this requirement.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R19:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R19.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance	The most comparable VSLs for a similar requirement are for the approved IRO-002-2, Requirement R1. Those VSLs are gradated based on a degree of incompleteness of the needed data exchange capabilities and the SDT has adopted that philosophy here as well.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-001-3, Requirement R20:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R20.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance	The most comparable VSLs for a similar requirement are for the approved IRO-002-2, Requirement R1. Those VSLs are gradated based on a degree of incompleteness of the needed data exchange capabilities and the SDT has adopted that philosophy here as well.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-002-4, Requirement R1:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R1.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	There is a similar requirement in approved TOP-002-2.1b, Requirement R1. Those VSLs are graded based on differing parts of the requirement. This requirement has only one objective – performing the analysis. That objective matches to the Severe VSL in approved TOP-002-2.1b and the SDT has proposed a binary Severe VSL here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-002-4, Requirement R2:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R2.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	There is a similar requirement in approved TOP-002-2.1b, Requirement R1. Those VSLs are graded based on differing parts of the requirement. This requirement has only one objective – performing the analysis. That objective matches to the Severe VSL in approved TOP-002-2.1b and the SDT has proposed a binary Severe VSL here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-002-4, Requirement R3:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R3.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	There is a similar requirement in approved TOP-002-2.1b, Requirement R4. Those VSLs are gradated and the SDT is proposing similar treatment here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-002-4, Requirement R4:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R4.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	There is a similar requirement in approved TOP-002-2.1b, Requirement R1. Those VSLs are gradated and the SDT is proposing similar treatment here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-002-4, Requirement R5:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R5.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	There is a similar requirement in approved TOP-002-2.1b, Requirement R4. Those VSLs are gradated and the SDT is proposing similar treatment here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-002-4, Requirement R6:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R6.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance	This is a new requirement with no comparable requirements to compare against. There is only one action to take here, to submit the Operating Plan. There is no partial compliance so the SDT assigned a binary Severe VSL here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-002-4, Requirement R7:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R7.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance	This is a new requirement with no comparable requirements to compare against. There is only one action to take here, to submit the Operating Plan. There is no partial compliance so the SDT assigned a binary Severe VSL here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-003-3, Requirement R1:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R1.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	The proposed requirement is similar to approved IRO-010-1a, Requirement R1. The proposed VSLs are similar in that they build on a graduated scale based on missing parts of the requirement. Thus, the VSL in the proposed standard does not lower the level of compliance currently required by setting VSLs that are less punitive than those already proposed.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-003-3, Requirement R2:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R2.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	The proposed requirement is similar to approved IRO-010-1a, Requirement R1. The proposed VSLs are similar in that they build on a graduated scale based on missing parts of the requirement. Thus, the VSL in the proposed standard does not lower the level of compliance currently required by setting VSLs that are less punitive than those already proposed.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-003-3, Requirement R3:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R3.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	The proposed requirement is similar to approved IRO-010-1a, Requirement R2. The proposed VSLs are similar in that they build on a graduated scale based on missing parts of the requirement. Thus, the VSL in the proposed standard does not lower the level of compliance currently required by setting VSLs that are less punitive than those already proposed.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-003-3, Requirement R4:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R4.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	The proposed requirement is similar to approved IRO-010-1a, Requirement R2. The proposed VSLs are similar in that they build on a graduated scale based on missing parts of the requirement. Thus, the VSL in the proposed standard does not lower the level of compliance currently required by setting VSLs that are less punitive than those already proposed.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed TOP-003-3, Requirement R5:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R5.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The proposed requirement is similar to approved IRO-010-1a, Requirement R3. Those VSLs tried to gradate the provision of data. The SDT did not believe that such an exercise benefited reliability and that this was a binary situation where an entity supplies the data or it doesn't. Therefore, the SDT has assigned a binary Severe VSL here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-001-4, Requirement R1:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R1.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The proposed requirement is similar to approved IRO-001-1.1, Requirement R3. Those VSLs are binary Severe. Therefore, the SDT has assigned these VSLs to be binary Severe.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-001-4, Requirement R2:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R2.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The proposed requirement is similar to approved IRO-001-1.1, Requirement R8. Those VSLs tried to gradate the situation by separating out following an Operating Instruction and informing of the inability to follow. Those actions are now separate requirements and this requirement is only about complying with the Operating Instruction which has a binary Severe VSL in approved IRO-001-1.1. Therefore, the SDT has assigned a binary Severe VSL here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-001-4, Requirement R3:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R3.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The proposed requirement is similar to approved IRO-001-1.1, Requirement R8. Those VSLs tried to gradate the situation by separating out following an Operating Instruction and informing of the inability to follow. Those actions are now separate requirements and this requirement is only about informing the Reliability Coordinator which has a single Moderate VSL in approved IRO-001-1.1. The SDT believes that such a failure should be classified as binary Severe under current guidelines.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-002-4, Requirement R1:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R1.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The proposed requirement is similar to approved IRO-002-2, Requirement R1. Those VSLs are gradated and the SDT has followed that pattern here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-002-4, Requirement R2:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R2.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The proposed requirement is similar to approved IRO-002-2, Requirement R8. Those VSLs tried to gradate the situation. The SDT did not believe that such an exercise benefited reliability and that this was a binary situation where an entity has supplied the authority or it hasn't. Therefore, the SDT has assigned a binary Severe VSL here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-002-4, Requirement R3:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R3.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The proposed requirement is similar to approved IRO-003-2, Requirement R1. Those VSLs tried to gradate the degree of monitoring. The SDT did not believe that such an exercise benefited reliability and that this was a binary situation where an entity is doing the monitoring or it isn't. Therefore, the SDT has assigned a binary Severe VSL here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-002-4, Requirement R4:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R4.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The proposed requirement is similar to approved IRO-002-2, Requirement R4. Those VSLs tried to gradate the situation. The SDT did not believe that such an exercise benefited reliability and that this was a binary situation where an entity is providing adequate monitoring facilities with the particular emphasis or it doesn't. Therefore, the SDT has assigned a binary Severe VSL here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-008-2, Requirement R1:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R1.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The proposed requirement is similar to approved IRO-008-1, Requirement R1. Those VSLs tried to gradate the performance of the Operational Planning Analysis by the number of days in a month that it wasn't available. The SDT did not believe that such an exercise benefited reliability and that this was a binary situation where an entity performs the analysis or it doesn't. Therefore, the SDT has assigned a binary Severe VSL here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-008-2, Requirement R2:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R2.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	This is a new requirement with no comparable requirement to compare against. The SDT believes that this is a binary situation where an entity performs the coordination activity or it doesn't. Therefore, the SDT has assigned a binary Severe VSL here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-008-2, Requirement R3:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R3.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	The proposed requirement is similar to approved IRO-008-1, Requirement R3. Those VSLs gradated the notification efforts. The SDT has followed a similar path and assigned incremental VSLs here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-008-2, Requirement R4:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R4.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	The proposed requirement is similar to approved IRO-008-1, Requirement R2. Those VSLs gradated the performance of Real-time Assessments based on time increments. The SDT made a similar assignment here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-008-2, Requirement R5:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R5.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	The proposed requirement is similar to approved IRO-008-1, Requirement R3. Those VSLs partially gradated the notification elements. The SDT has followed a similar path but assigned a complete set of incremental VSLs here consistent with current accepted practice.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-008-2, Requirement R6:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R6.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	The proposed requirement is similar to proposed TOP-001-3, Requirement R15. Those VSLs are set up as a binary Severe situation but that requirement only involves notifying one entity, the Reliability Coordinator. There are potentially many more entities involved with this requirement so the SDT has set up a gradated set of VSLs.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-010-2, Requirement R1:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R1.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	The proposed requirement is similar to approved IRO-010-1a, Requirement R1. The proposed VSLs are similar in that they build on a graduated scale based on missing parts of the requirement. Thus, the VSL in the proposed standard does not lower the level of compliance currently required by setting VSLs that are less punitive than those already proposed.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-010-2, Requirement R2:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R2.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	The proposed requirement is similar to approved IRO-010-1a, Requirement R2. The proposed VSLs are similar in that they build on a graduated scale based on missing parts of the requirement. Thus, the VSL in the proposed standard does not lower the level of compliance currently required by setting VSLs that are less punitive than those already proposed.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-010-2, Requirement R3:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R3.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	The proposed requirement is similar to approved IRO-010-1a, Requirement R2. The proposed VSLs are similar in that they build on a graduated scale based on missing parts of the requirement. Thus, the VSL in the proposed standard does not lower the level of compliance currently required by setting VSLs that are less punitive than those already proposed.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-014-3, Requirement R1:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R1.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	The proposed requirement is similar to approved IRO-014-1, Requirement R1. Those VSLs present an incremental approach and the SDT has continued that approach.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-014-3, Requirement R2:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R2.	Meets NERC's VSL guidelines - There is an incremental aspect to the violation and the VSLs follow the guidelines for incremental violations.	This is a new requirement with no comparable requirement to follow. There are a number of criteria cited for the requirement and this lends itself to an incremental approach for the VSLs.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-014-3, Requirement R3:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R3.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The proposed requirement is similar to approved IRO-016-1, Requirement R1. Those VSLs are presented in an incremental approach. Therefore, the SDT has assigned incremental VSLs here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-014-3, Requirement R4:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R4.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The proposed requirement is similar to approved IRO-016-1, Requirement R1.2. Those VSLs are presented as binary Severe. Therefore, the SDT has assigned a binary Severe VSL here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-014-3, Requirement R5:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R5.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The proposed requirement is similar to approved IRO-016-1, Requirement R1. Those VSLs tried to gradate things but the only differential is whether evidence was provided or not – actions themselves are covered in Severe. The SDT did not believe that such an exercise benefited reliability and that this was a binary situation where an entity develops a plan or it doesn't. Therefore, the SDT has assigned a binary Severe VSL here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-014-3, Requirement R6:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R6.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The proposed requirement is similar to approved IRO-016-1, Requirement R1.1. Those VSLs tried to gradate the situation. The SDT did not believe that such an exercise benefited reliability and that this was a binary situation where an entity implements the plan or it doesn't. Therefore, the SDT has assigned a binary Severe VSL here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-014-3, Requirement R7:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R7.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	The proposed requirement is similar to proposed TOP-001-3, Requirement R7. Those VSLs are presented as binary Severe. Therefore, the SDT has assigned a binary Severe VSL here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-017-1, Requirement R1:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R1.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	This requirement is similar to proposed IRO-005-3.1a, Requirement R6 which has gradated VSLs and the SFT has adopted that approach here.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-017-1, Requirement R2:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R2.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	This is a new requirement with no similar requirement in the Reliability Standards. The responsible entity either follows the process or it doesn't. Attempting to increment the effort doesn't make sense. Therefore, this VSL is binary Severe.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-017-1, Requirement R3:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R3.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	This requirement is similar to approved TPL-001-4, Requirement R8. In that case, the VSLs are incremental. However, the responsible entities there are dealing with many other entities. In this case, the responsible entity is dealing only with Reliability Coordinators which makes an incremental approach unnecessary due to the much smaller number of involved entities. Therefore, the VSL is binary Severe.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.

VSLs for Proposed IRO-017-1, Requirement R4:

R#	Compliance with NERC's VSL Guidelines	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R4.	Meets NERC's VSL guidelines - Severe: Missing most or all of the significant elements (or a significant percentage) of the required performance.	This requirement is similar in nature to proposed IRO-017-1, Requirement R1. The VSL has been assigned in a similar manner – binary Severe.	The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.	The proposed VSL uses the same terminology as used in the associated requirement, and is, therefore, consistent with the requirement.	The VSL is based on a single violation and not cumulative violations.