NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Justification for Proposed VRFs and VSLs for PRC-006-1 – Automatic Underfrequency Load Shedding

This document provides the justification for assignment of VRFs and VSLs, identifying how each proposed VRF and VSL meets NERC's criteria and FERC's Guidelines. NERC's criteria for setting VRFs and VSLs; FERC's five guidelines (G1 – G5) for approving VRFs; and FERC's four guidelines (G1-G4) for setting VSLs are provided at the end of this document.

PRC-006-1 VRF and VSL Justifications		
R1	Proposed VRF	Medium
	NERC VRF Discussion	*This requirement is assigned a medium VRF because it is a planning requirement that while is administrative in nature is an input to other requirements in the standard that are assigned a higher VRF. Documenting criteria for selecting islands is an important step in designing a UFLS program but is administrative in nature. This is requirement, if violated, would not 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 but violation of the dependent requirements could have a higher impact on the bulk electric system*
	FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report • *Not applicable to this requirement.*
	FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard • *Requirement R1 while administrative in nature is an input to requirements that have a greater impact on the bulk electric system than an administrative requirement does and as a result of the dependency Requirement R1 is assigned a Medium VRF.*
	FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards • *Not applicable to this requirement.*
	FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs • *The assignment is consistent with the NERC VRF guidelines.*
	FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation • *There is only one objective in this requirement and it is assigned an appropriate VRF*
	Proposed Lower VSL	N/A
	Proposed Moderate VSL	The Planning Coordinator developed and documented criteria but failed to include the consideration of historical events, to select portions of the BES, including interconnected portions of the BES in adjacent Planning Coordinator footprints and Regional Entity footprints that may form islands. OR The Planning Coordinator developed and documented criteria but failed to include the consideration of system studies, to select portions of the BES, including interconnected portions of the BES in adjacent Planning Coordinator footprints and Regional Entity footprints, that may form islands.
	Proposed High VSL	The Planning Coordinator developed and documented criteria but failed to include the consideration of historical events and system studies, to select portions of the BES, including interconnected portions of the BES in

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		adjacent Planning Coordinator footprints and Regional Entity footprints, that may form islands
	Proposed Severe VSL	The Planning Coordinator failed to develop and document criteria to select portions of the BES, including interconnected portions of the BES in adjacent Planning Coordinator footprints and Regional Entity footprints, that may form islands
	FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	*There is currently no requirement like the requirement proposed in PRC-006-1. The VSL assignment does not lower the current level of compliance.*
	FERC VSL G2 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	*The VSL is written not as a pass/fail VSL and guideline 2A does not apply. The VSL is written in clear and unambiguous language, meeting Guideline 2B.*
	FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	*The VSL aligns with the language of the requirement, and does not add to nor take away from it.*
	FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	*The VSL is based on a single violation of the requirement.*

PRC-006-1 VRF and VSL Justifications		
R2	Proposed VRF	Medium
	NERC VRF Discussion	*This requirement is assigned a medium VRF because it is a planning requirement that is more than administrative in nature because it requires each Planning Coordinator to select islands to use as a basis for designing a UFLS program. While not administrative (hence not Lower), violating this requirement would not, under emergency, abnormal, or restoration conditions anticipated by the preparations, lead to bulk electric system instability, separation, or cascading failures, nor hinder restoration to a normal condition. The result of this requirement is the list of islands to serve as a basis for UFLS program design.*
	FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report • *Not applicable to this requirement.*
	FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard • *While this requirement is similar to Requirement R1 this requirement is more than administrative (greater than Lower) because islands are the basis of the UFLS program design.*
	FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards • *Not applicable to this requirement.*
	FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs • *The assignment is consistent with the NERC definition of Medium VRF.*
	FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation • *This requirement in part relies on the output of requirement R1, the criteria for selecting islands. While Requirement R1 is a lower VRF this requirement is a Medium because the identification of islands for establishing a UFLS program is the intent of the requirement and is more than administrative in nature.*
	Proposed Lower VSL	N/A
	Proposed Moderate VSL	The Planning Coordinator identified an island(s) to serve as a basis for designing its UFLS program but failed to include one (1) of the Parts as specified in Requirement R2, Parts 2.1, 2.2 or 2.3.
	Proposed High VSL	The Planning Coordinator identified an island(s) to serve as a basis for designing its UFLS program but failed to include two (2) of the Parts as specified in Requirement R2, Parts 2.1, 2.2 or 2.3.
	Proposed Severe VSL	The Planning Coordinator identified an island(s) to serve as a basis for designing its UFLS program but failed to include all of the Parts as specified in Requirement R2, Parts 2.1, 2.2 or 2.3. OR The Planning Coordinator failed to identify any island(s) to serve as a basis for designing its UFLS program.
	FERC VSL G1 Violation Severity Level Assignments Should Not	*The VSLs for the stated requirement are not based on numeric gradations. Instead, they are based on the number of parts an entity did not comply with. As written, the VSL assignments comply with Guideline 1, because the VSLs*

	Have the Unintended Consequence of Lowering the Current Level of Compliance	*do not have the unintended consequence of lowering the current or historic level of compliance.*
	FERC VSL G2 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	*The VSL is written not as a pass/fail VSL and guideline 2A does not apply. The VSL is written in clear and unambiguous language, meeting Guideline 2B.*
	FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	*The VSL aligns with the language of the requirement, and does not add to nor take away from it.*
	FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	*The VSL is based on a single violation of the requirement.*

PRC-006-1 VRF and VSL Justifications		
R3	Proposed VRF	High
	NERC VRF Discussion	*This requirement is assigned a High VRF because this requirement requires each Planning Coordinator to design a UFLS program that meet specific performance characteristics. This is a requirement in a planning time frame that, if violated, could hinder restoration to a normal condition.*
	FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report • *This requirement does not fall into one of the categories identified.*
	FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard • *This requirement does have sub-parts but these parts all support the parent requirement and do not have independent objectives.*
	FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards • *Not applicable to this requirement.*
	FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs • *The assignment is consistent with the NERC definition of High*

		VRF.
	FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation • *There is only one objective in this requirement and it is assigned an appropriate VRF.*
	Proposed Lower VSL	N/A
	Proposed Moderate VSL	The Planning Coordinator developed an UFLS program, including notification of and a schedule for implementation by UFLS entities within its area, but failed to meet one (1) of the performance characteristic in Requirement R3, Parts 3.1, 3.2, or 3.3 in simulations of underfrequency conditions.
	Proposed High VSL	The Planning Coordinator developed an UFLS program including notification of and a schedule for implementation by UFLS entities within its footprint, but failed to meet two (2) of the performance characteristic in Requirement R3, Parts 3.1, 3.2, or 3.3 in simulations of underfrequency conditions.
	Proposed Severe VSL	The Planning Coordinator developed an UFLS program including notification of and a schedule for implementation by UFLS entities within its footprint, but failed to meet all the performance characteristic in parts 3.1, 3.2, and 3.3 in simulations of underfrequency conditions. OR The Planning Coordinator failed to develop a UFLS program including notification of and a schedule for implementation by UFLS entities within its area.
	FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	*The VSLs for the stated requirement are not based on numeric gradations. Instead, they are based on the number of "Parts" of a requirement that an entity did not comply with. As written, the VSL assignments comply with Guideline 1, because the VSLs do not have the unintended consequence of lowering the current or historic level of compliance. PRC-006-0 Requirement R1 requires that the RRO develop a program. This requirement contains four sub-parts that align with separate requirements in the proposed standard. These separate requirements have their own VRF and set of VSLs for compliance. Requirement R1.1 in PRC-006-0 maps to R5, R7, and R13 in draft (3) PRC-006-1.* *Requirement R1.2 in PRC-006-0 maps to R3 in draft (3) PRC-006-1* *Requirement R1.3 in PRC-006-0 maps to R6, R7, and R8 in draft (3) PRC-006-1.* *Requirement R1.4 in PRC-006-0 maps to R4, and R11.*
	FERC VSL G2 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	*The VSL is written not as a pass/fail VSL and guideline 2A does not apply. The VSL is written in clear and unambiguous language, meeting Guideline 2B.*

	Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	
	FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	*The VSL aligns with the language of the requirement, and does not add to nor take away from it.*
	FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	*The VSL is based on a single violation of the requirement.*

PRC-006-1 VRF and VSL Justifications		
R4	Proposed VRF	High
	NERC VRF Discussion	*This requirement is assigned a High VRF because the reliability objective of this requirement is to perform an assessment of the UFLS program every five years. Violation of this requirement, by failing to validate the UFLS program through dynamic simulations, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to bulk electric system failure (blackout), or could place the bulk electric system at an unacceptable risk of failure (blackout), and could hinder restoration to a normal condition.*
	FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report • *Protection systems and their coordination*
	FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard • *This requirement has sub-parts but these parts all support the parent requirement and do not have independent objectives.*
	FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards • *Not applicable to this requirement.*
	FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs • *The assignment is consistent with the NERC definition of High VRF.*
	FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation • *There is only one objective in this requirement and it is assigned an appropriate VRF.*
	Proposed Lower VSL	The Planning Coordinator conducted and documented a UFLS assessment at least once every five years that determined through dynamic simulation whether the UFLS program design met the performance characteristics in Requirement R3 for each island identified in Requirement R2 but the simulation failed to include one (1) of the items as specified in Requirement R4, Parts 4.1 through 4.7.
	Proposed Moderate VSL	The Planning Coordinator conducted and documented a UFLS assessment at

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		least once every five years that determined through dynamic simulation whether the UFLS program design met the performance characteristics in Requirement R3 for each island identified in Requirement R2 but the simulation failed to include two (2) of the items as specified in Requirement R4, Parts 4.1 through 4.7.
	Proposed High VSL	The Planning Coordinator conducted and documented a UFLS assessment at least once every five years that determined through dynamic simulation whether the UFLS program design met the performance characteristics in Requirement R3 for each island identified in Requirement R2 but the simulation failed to include three (3) of the items as specified in Requirement R4, Parts 4.1 through 4.7.
	Proposed Severe VSL	The Planning Coordinator conducted and documented a UFLS assessment at least once every five years that determined through dynamic simulation whether the UFLS program design met the performance characteristics in Requirement R3 but simulation failed to include four (4) or more of the items as specified in Requirement R4, Parts 4.1 through 4.7. OR The Planning Coordinator failed to conduct and document a UFLS assessment at least once every five years that determined through dynamic simulation whether the UFLS program design met the performance characteristics in Requirement R3 for each island identified in Requirement R2
	FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	*The VSLs for the stated requirement are not based on numeric gradations. Instead, they are based on the number of Parts of a Requirement that an entity did not comply with. As written, the VSL assignments comply with Guideline 1, because the VSLs do not have the unintended consequence of lowering the current or historic level of compliance. Failure to complete an assessment every five years was assigned a Level Four noncompliance in PRC-006-0, which is equivalent to a Severe VSL and is also assigned a Severe VSL in the draft (3) PRC-006-1.*
	FERC VSL G2 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	*The VSL is written not as a pass/fail VSL and guideline 2A does not apply. The VSL is written in clear and unambiguous language, meeting Guideline 2B.*
	FERC VSL G3 Violation Severity Level	*The VSL aligns with the language of the requirement, and does not add to nor take away from it.*

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	Assignment Should Be Consistent with the Corresponding Requirement	
	FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	*The VSL is based on a single violation of the requirement.*

PRC-006-1 VRF and VSL Justifications		
R5	Proposed VRF	Medium
	NERC VRF Discussion	*This requirement is assigned a Medium VRF because the reliability objective of this requirement is to reach concurrence with all other affected Planning Coordinators on assessment results when an island spans multiple footprints. This requirement is ensures coordination between Planning Coordinators knowing that islands may very possibly span multiple Planning Coordinator footprints. While not administrative in nature, violation of this requirement, by failing to reach concurrence, would not necessarily , under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to bulk electric system failure (blackout), or could place the bulk electric system at an unacceptable risk of failure (blackout), and could hinder restoration to a normal condition hence a Medium VRF.*
	FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report • *Protection systems and their coordination.*
	FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard • *This requirement does not have sub-parts but these parts all support the parent requirement and do not have independent objectives.*
	FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards • *Not applicable to this requirement.*
	FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs • *The assignment is consistent with the NERC definition of Medium VRF.*
	FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation • *There is only one objective in this requirement and it is assigned an appropriate VRF.*
	Proposed Lower VSL	N/A
	Proposed Moderate VSL	N/A
	Proposed High VSL	N/A

	Proposed Severe VSL	The Planning Coordinator, whose area or portions of whose area is part of an island identified by it or another Planning Coordinator which includes multiple Planning Coordinator areas or portions of those areas, failed to coordinate its UFLS program design through one of the manners described in Requirement R5.
	FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	*The VSLs for the stated requirement are not based on numeric gradations. As written, the VSL assignments comply with Guideline 1, because the VSLs do not have the unintended consequence of lowering the current or historic level of compliance.*
	FERC VSL G2 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	*The VSL is written as a pass/fail VSL and contains a Severe in compliance with guideline 2A. The VSL is written in clear and unambiguous language, meeting Guideline 2B.*
	FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	*The VSL aligns with the language of the requirement, and does not add to nor take away from it.*
	FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	*The VSL is based on a single violation of the requirement.*

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R6	Proposed VRF	Lower
	NERC VRF Discussion	*This requirement is assigned a Lower VRF because it requires that Planning Coordinators annually maintain a UFLS database. This requirement is clearly administrative; however, it is important that UFLS data/information is stored in a database. This requirement currently exists in PRC-006-0 Requirement R1.3. It is very unlikely that violating this planning requirement, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the*

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		electrical state of the bulk electric system, or the ability to effectively control or restore the bulk electric system.
	FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report • *Not applicable.*
	FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard • *Not applicable – this requirement does not have sub-parts.*
	FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards • *PRC-006-0 (not FERC approved) contains a similar requirement, R1.3 but does not have a VRF.*
	FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs • *The assignment is consistent with the NERC definition of Lower VRF*
	FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation • *There is only one objective in this requirement and it is assigned an appropriate VRF*
	Proposed Lower VSL	N/A
	Proposed Moderate VSL	N/A
	Proposed High VSL	N/A
	Proposed Severe VSL	The Planning Coordinator failed to maintain a UFLS database for use in event analyses and assessments of the UFLS program at least once each calendar year, with no more than 15 months between maintenance activities.
	FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	*The VSLs for the stated requirement are not based on numeric gradations. As written, the VSL assignments comply with Guideline 1, because the VSLs do not have the unintended consequence of lowering the current or historic level of compliance.*
	FERC VSL G2 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	*The VSL is written as a pass/fail VSL and contains a Severe in compliance with guideline 2A. The VSL is written in clear and unambiguous language, meeting Guideline 2B.*

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	FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	*The VSL aligns with the language of the requirement, and does not add to nor take away from it.*
	FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	*The VSL is based on a single violation of the requirement.*

PRC-006-1 VRF and VSL Justifications		
R7	Proposed VRF	Lower
	NERC VRF Discussion	*This requirement is assigned a lower VRF because it is a planning requirement that is administrative in nature. This requirement requires the Planning Coordinators to share their UFLS database with other Planning Coordinators. This is administrative and, if violated, would not adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system.*
	FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report • *Not applicable to this requirement.*
	FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard • *Not applicable to this requirement.*
	FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards • *PRC-009-0 Requirement R2 that require entities to maintain a database is assigned a lower VRF.*
	FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs • *The assignment is consistent with the NERC definition of Lower VRF.*
	FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation • *There is only one objective in this requirement and it is assigned an appropriate VRF.*
	Proposed Lower VSL	The Planning Coordinator provided its UFLS database to other Planning Coordinators more than 30 calendar days and up to and including 40 calendar days following the request.
	Proposed Moderate VSL	The Planning Coordinator provided its UFLS database to other Planning Coordinators more than 40 calendar days but less than and including 50 calendar days following the request.
	Proposed High VSL	The Planning Coordinator provided its UFLS database to other Planning Coordinators more than 50 calendar days but less than and including 60 calendar days following the request.

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	Proposed Severe VSL	The Planning Coordinator provided its UFLS database to other Planning Coordinators more than 60 calendar days following the request. OR The Planning Coordinator failed to provide its UFLS database to other Planning Coordinators.
	FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	*The VSLs for the stated requirement are based on numeric gradations. As written, the VSL assignments comply with Guideline 1, because the VSLs do not have the unintended consequence of lowering the current or historic level of compliance.*
	FERC VSL G2 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	*The VSL is written not as a pass/fail VSL and guideline 2A does not apply. The VSL is written in clear and unambiguous language, meeting Guideline 2B.*
	FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	*The VSL aligns with the language of the requirement, and does not add to nor take away from it.*
	FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	*The VSL is based on a single violation of the requirement.*

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R8	Proposed VRF	Lower
	NERC VRF Discussion	*This requirement is assigned a lower VRF because it is a planning requirement that is administrative in nature. The responsible entities are required to provide data to the Planning Coordinators to maintain the*

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		database. This is administrative and, if violated, would not adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system.
	FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report • *Not applicable to this requirement.*
	FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard • *Not applicable to this requirement.*
	FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards • *Consistent with PRC-007-0 R2 and R3 Lower VRF.*
	FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs • *The assignment is consistent with the NERC definition of Lower VRF.*
	FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation • *There is only one objective in this requirement and it is assigned an appropriate VRF.*
	Proposed Lower VSL	The UFLS entity provided data to its Planning Coordinator(s) more than 5 calendar days but less than or equal to 10 calendar days following the schedule specified by the Planning Coordinator(s) to support maintenance of each Planning Coordinator's UFLS database.
	Proposed Moderate VSL	The UFLS entity provided data to its Planning Coordinator(s) more than 10 calendar days but less than or equal to 15 calendar days following the schedule specified by the Planning Coordinator(s) to support maintenance of each Planning Coordinator's UFLS database. OR The UFLS entity provided data to its Planning Coordinator(s) but the data was not according to the format specified by the Planning Coordinator(s) to support maintenance of each Planning Coordinator's UFLS database.
	Proposed High VSL	The UFLS entity provided data to its Planning Coordinator(s) more than 15 calendar days but less than or equal to 20 calendar days following the schedule specified by the Planning Coordinator(s) to support maintenance of each Planning Coordinator's UFLS database.
	Proposed Severe VSL	The UFLS entity provided data to its Planning Coordinator(s) more than 20 calendar days following the schedule specified by the Planning Coordinator(s) to support maintenance of each Planning Coordinator's UFLS database. OR The UFLS entity failed to provide data to its Planning Coordinator(s) to support maintenance of each Planning Coordinator's UFLS database.
	FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	*The VSLs for the stated requirement are based on numeric gradations. As written, the VSL assignments comply with Guideline 1, because the VSLs do not have the unintended consequence of lowering the current or historic level of compliance.*
	FERC VSL G2 Violation Severity Level	*The VSL is written not as a pass/fail VSL and guideline 2A does not apply. The VSL is written in clear and unambiguous language, meeting Guideline*

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	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	*2B.*
	FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	*The VSL aligns with the language of the requirement, and does not add to nor take away from it.*
	FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	*The VSL is based on a single violation of the requirement.*

PRC-006-1 VRF and VSL Justifications		
R9	Proposed VRF	High
	NERC VRF Discussion	*The reliability objective of this requirement is for responsible entities to provide load tripping in accordance with the UFLS program design and schedule for application. This requirement is assigned a High VRF because violation of it, by failing to provide the load tripping required by the UFLS program design, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to bulk electric system failure (blackout), or could place the bulk electric system at an unacceptable risk of failure (blackout), and could hinder restoration to a normal condition.*
	FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report • *Protection systems and their coordination.*
	FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard • *Not applicable to this requirement.*
	FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards • *PRC-007-0 Requirement R1 is assigned a Medium VRF.*
	FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs • *The assignment is consistent with the NERC definition of High VRF.*

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	FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation • *There is only one objective in this requirement and it is assigned an appropriate VRF.*
	Proposed Lower VSL	The UFLS entity provided less than 100% but more than (and including) 95% of automatic tripping of Load in accordance with the UFLS program design and schedule for application determined by the Planning Coordinator(s) area in which it owns assets.
	Proposed Moderate VSL	The UFLS entity provided less than 95% but more than (and including) 90% of automatic tripping of Load in accordance with the UFLS program design and schedule for application determined by the Planning Coordinator(s) area in which it owns assets.
	Proposed High VSL	The UFLS entity provided less than 90% but more than (and including) 85% of automatic tripping of Load in accordance with the UFLS program design and schedule for application determined by the Planning Coordinator(s) area in which it owns assets.
	Proposed Severe VSL	The UFLS entity provided less than 85% of automatic tripping of Load in accordance with the UFLS program design and schedule for application determined by the Planning Coordinator(s) area in which it owns assets.
	FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	*The VSLs for the stated requirement are based on numeric gradations. As written, the VSL assignments comply with Guideline 1, because the VSLs do not have the unintended consequence of lowering the current or historic level of compliance. Requirement R1 of PRC-007 contains many requirements (in one) that our team has split out into independent requirements and therefore the comparison of VSLs is not a apples to apples comparison. The Lower VSL for Requirement R1 of PRC-007 says that the entity missed one or more of the RRO program requirements but was consistent with the amount of load shedding. Because our corresponding requirement (R10) focuses only on load shedding (the other RRO requirements map to other Requirements), adopting the load shedding part of the existing Lower for R1 of PRC-007 would not make sense because, it says that the load shedding requirement was met making it an invalid VSL for our purposes. We cannot write such a VSL. The other VSLs are consistent with the other levels (with the only exception being the Lower).PRC-007-0 R1 Moderate establishes a less than 95% of the regional requirement. PRC-007-0 R1 High establishes a less than 90% of the regional requirement and PRC-007-0 R1 Severe establishes a less than 85% of the regional requirement.*
	FERC VSL G2 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	*The VSL is written not as a pass/fail VSL and guideline 2A does not apply. The VSL is written in clear and unambiguous language, meeting Guideline 2B.*

PRC-006-1 VRF and VSL Justifications		
	Severity Level Assignments that Contain Ambiguous Language	
	FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	*The VSL aligns with the language of the requirement, and does not add to nor take away from it.*
	FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	*The VSL is based on a single violation of the requirement.*

PRC-006-1 VRF and VSL Justifications		
R10	Proposed VRF	High
	NERC VRF Discussion	*The reliability objective of this requirement is that Transmission Owners provide automatic switching of Elements according to the UFLS program design. Similar to requirement R9, this requirement is assigned a High VRF because violation of it, by failing to provide automatic switching of Elements required by the UFLS program design, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to bulk electric system failure (blackout), or could place the bulk electric system at an unacceptable risk of failure (blackout), and could hinder restoration to a normal condition.*
	FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report • *Protection systems and their coordination.*
	FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard • *Not applicable to this requirement.*
	FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards • *Not applicable to this requirement.*
	FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs • *The assignment is consistent with the NERC definition of High VRF.*
	FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation • *There is only one objective in this requirement and it is assigned an appropriate VRF.*
	Proposed Lower VSL	The Transmission Owner provided less than 100% but more than (and including) 95% automatic switching of its existing capacitor banks, Transmission Lines, and reactors to control over-voltage if required by the UFLS program and schedule for application determined by the Planning Coordinator(s) in each Planning Coordinator area in which the Transmission Owner owns transmission.
	Proposed Moderate VSL	The Transmission Owner provided less than 95% but more than (and

PRC-006-1 VRF and VSL Justifications		
		including) 90% automatic switching of existing capacitor banks, Transmission Lines, and reactors to control over-voltage if required by the UFLS program and schedule for application determined by the Planning Coordinator(s) in each Planning Coordinator footprint in which it owns transmission
	Proposed High VSL	The Transmission Owner provided less than 90% but more than (and including) 85% automatic switching of existing capacitor banks, Transmission Lines, and reactors to control over-voltage if required by the UFLS program and schedule for application determined by the Planning Coordinator(s) in each Planning Coordinator area in which the Transmission Owner owns transmission.
	Proposed Severe VSL	The Transmission Owner provided less than 85% automatic switching of existing capacitor banks, Transmission Lines, and reactors to control over-voltage if required by the UFLS program and schedule for application determined by the Planning Coordinator(s) in each Planning Coordinator area in which the Transmission Owner owns transmission.
	FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	*The VSLs for the stated requirement are based on numeric gradations. As written, the VSL assignments comply with Guideline 1, because the VSLs do not have the unintended consequence of lowering the current or historic level of compliance. While there isn't an exact requirement in the current body of standards (this cannot be mapped to an existing requirement) a similar requirement PRC-007-0 Requirement R1 VSL's establish the same increments of load shedding as the proposed VSLs for this requirement.*
	FERC VSL G2 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	*The VSL is written not as a pass/fail VSL and guideline 2A does not apply. The VSL is written in clear and unambiguous language, meeting Guideline 2B.*
	FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	*The VSL aligns with the language of the requirement, and does not add to nor take away from it.*
	FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of	*The VSL is based on a single violation of the requirement.*

PRC-006-1 VRF and VSL Justifications		
	Violations	

PRC-006-1 VRF and VSL Justifications		
R11	Proposed VRF	Medium
	NERC VRF Discussion	*A similar requirement exists in PRC-009-0 Requirement R1 and is assigned a Medium VRF. This requirement is assigned a Medium VRF because it requires assessment of UFLS equipment performance and UFLS program effectiveness during specified events involving UFLS activation that could identify deficiencies in either, and if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state of the bulk electric system, or the ability to effectively control or restore the bulk electric system.*
	FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report • *Not directly applicable to this requirement.*
	FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard • *Only one VRF is assigned to requirement and its sub-parts.*
	FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards • *Consistent with PRC-009-0 R1 VRF.*
	FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs • *The assignment is consistent with the NERC definition of Medium VRF.*
	FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation • *There is only one objective in this requirement and it is assigned an appropriate VRF.*
	Proposed Lower VSL	The Planning Coordinator, in whose area a BES islanding event resulting in system frequency excursions below the initializing set points of the UFLS program, conducted and documented an assessment of the event and evaluated the parts as specified in Requirement R11, Parts 11.1 and 11.2 within a time greater than one year but less than or equal to 13 months of actuation.
	Proposed Moderate VSL	The Planning Coordinator, in whose area a BES islanding event resulting in system frequency excursions below the initializing set points of the UFLS program, conducted and documented an assessment of the event and evaluated the parts as specified in Requirement R11, Parts 11.1 and 11.2 within a time greater than 13 months but less than or equal to 14 months of actuation.
	Proposed High VSL	The Planning Coordinator, in whose area a BES islanding event resulting in system frequency excursions below the initializing set points of the UFLS program, conducted and documented an assessment of the event and evaluated the parts as specified in Requirement R11, Parts 11.1 and 11.2 within a time greater than 14 months but less than or equal to 15 months of actuation. OR The Planning Coordinator, in whose area a BES islanding event resulting in system frequency excursions below the initializing set points of the UFLS program, conducted and documented an assessment of the event within one year of event actuation but failed to evaluate one (1) of the Parts as specified

PRC-006-1 VRF and VSL Justifications		
		in Requirement R11, Parts 11.1 or 11.2.
	Proposed Severe VSL	The Planning Coordinator, in whose area a BES islanding event resulting in system frequency excursions below the initializing set points of the UFLS program, conducted and documented an assessment of the event and evaluated the Parts as specified in Requirement R11, Parts 11.1 and 11.2 within a time greater than 15 months of actuation. OR The Planning Coordinator, in whose area a BES islanding event resulting in system frequency excursions below the initializing set points of the UFLS program, failed to conduct and document an assessment of the event and evaluate the Parts as specified in Requirement R11, Parts 11.1 and 11.2. OR The Planning Coordinator, in whose area a BES islanding event resulting in system frequency excursions below the initializing set points of the UFLS program, conducted and documented an assessment of the event within one year of event actuation but failed to evaluate all of the Parts as specified in Requirement R11, Parts 11.1 and 11.2.
	FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	*The VSLs for the stated requirement are not based on numeric gradations. Instead, they are based on the number of parts an entity did not comply with. As written, the VSL assignments comply with Guideline 1, because the VSLs do not have the unintended consequence of lowering the current or historic level of compliance.*
	FERC VSL G2 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	*The VSL is written not as a pass/fail VSL and guideline 2A does not apply. The VSL is written in clear and unambiguous language, meeting Guideline 2B.*
	FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	*The VSL aligns with the language of the requirement, and does not add to nor take away from it.*
	FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single	*The VSL is based on a single violation of the requirement.*

PRC-006-1 VRF and VSL Justifications		
	Violation, Not on A Cumulative Number of Violations	

PRC-006-1 VRF and VSL Justifications		
R12	Proposed VRF	Medium
	NERC VRF Discussion	*A similar requirement exists in PRC-009-0 Requirement R1 and is assigned a Medium VRF. This requirement is assigned a Medium VRF because it requires assessment of UFLS equipment performance and UFLS program effectiveness during specified events involving UFLS activation that could identify deficiencies in either, and if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state of the bulk electric system, or the ability to effectively control or restore the bulk electric system.*
	FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report • *Not directly applicable to this requirement.*
	FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard • *Not applicable – this requirement does not have sub-parts.*
	FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards • *Consistent with PRC-009-0 R1 VRF.*
	FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs • *The assignment is consistent with the NERC definition of Medium VRF.*
	FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation • *There is only one objective in this requirement and it is assigned an appropriate VRF.*
	Proposed Lower VSL	N/A
	Proposed Moderate VSL	The Planning Coordinator, in which UFLS program deficiencies were identified per Requirement R11, conducted and documented a UFLS design assessment to consider the identified deficiencies greater than two years but less than or equal to 25 months of event actuation.
	Proposed High VSL	The Planning Coordinator, in which UFLS program deficiencies were identified per Requirement R11, conducted and documented a UFLS design assessment to consider the identified deficiencies greater than 25 months but less than or equal to 26 months of event actuation.
	Proposed Severe VSL	The Planning Coordinator, in which UFLS program deficiencies were identified per Requirement R11, conducted and documented a UFLS design assessment to consider the identified deficiencies greater than 26 months of event actuation. OR The Planning Coordinator, in which UFLS program deficiencies were identified per Requirement R11, failed to conduct and document a UFLS design assessment to consider the identified deficiencies.
	FERC VSL G1 Violation Severity Level	*The VSLs for the stated requirement are not based on numeric gradations. Instead, they are based on the number of Parts of a Requirement that an*

PRC-006-1 VRF and VSL Justifications		
	Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	*entity did not comply with. As written, the VSL assignments comply with Guideline 1, because the VSLs do not have the unintended consequence of lowering the current or historic level of compliance.*
	FERC VSL G2 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	*The VSL is written not as a pass/fail VSL and guideline 2A does not apply. The VSL is written in clear and unambiguous language, meeting Guideline 2B.*
	FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	*The VSL aligns with the language of the requirement, and does not add to nor take away from it.*
	FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	*The VSL is based on a single violation of the requirement.*

PRC-006-1 VRF and VSL Justifications		
R13	Proposed VRF	Medium
	NERC VRF Discussion	*A similar requirement exists in PRC-009-0 Requirement R1 and is assigned a Medium VRF. This requirement is assigned a Medium VRF because it requires assessment of UFLS equipment performance and UFLS program effectiveness during specified events involving UFLS activation that could identify deficiencies in either, and if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state of the bulk electric system, or the ability to effectively control or restore the bulk electric system.*
	FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report • *Not directly applicable to this requirement.*
	FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard • *Not applicable – this requirement does not have sub-parts.*

PRC-006-1 VRF and VSL Justifications		
	FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards • *Consistent with PRC-009-0 R1 VRF.*
	FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs • *The assignment is consistent with the NERC definition of Medium VRF.*
	FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation • *There is only one objective in this requirement and it is assigned an appropriate VRF.*
	Proposed Lower VSL	N/A
	Proposed Moderate VSL	N/A
	Proposed High VSL	N/A
	Proposed Severe VSL	The Planning Coordinator, in whose area a BES islanding event occurred that also included the area(s) or portions of area(s) of other Planning Coordinator(s) in the same islanding event and that resulted in system frequency excursions below the initializing set points of the UFLS program, failed to coordinate its UFLS event assessment with all other Planning Coordinators whose areas or portions of whose areas were also included in the same islanding event in one of the manners described in Requirement R13.
	FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	*The VSLs for the stated requirement are not based on numeric gradations. As written, the VSL assignments comply with Guideline 1, because the VSLs do not have the unintended consequence of lowering the current or historic level of compliance.*
	FERC VSL G2 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	*The VSL is written as a pass/fail VSL and contains a Severe in compliance with guideline 2A. The VSL is written in clear and unambiguous language, meeting Guideline 2B.*
	FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	*The VSL aligns with the language of the requirement, and does not add to nor take away from it.*
	FERC VSL G4	*The VSL is based on a single violation of the requirement.*

PRC-006-1 VRF and VSL Justifications		
	Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	

PRC-006-1 VRF and VSL Justifications		
R14	Proposed VRF	Lower
	NERC VRF Discussion	*A similar requirement exists in FAC-010-2 Requirement R5 and is assigned a Lower VRF. This requirement is assigned a Lower VRF because it is administrative in nature and 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.*
	FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report • *Not directly applicable to this requirement.*
	FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard • *Not applicable – this requirement does not have parts and similar requirements elsewhere in the standard.*
	FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards • *Consistent with FAC-010-2 R5 VRF.*
	FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs • *The assignment is consistent with the NERC definition of Lower VRF.*
	FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation • *There is only one objective in this requirement and it is assigned an appropriate VRF.*
	Proposed Lower VSL	N/A
	Proposed Moderate VSL	N/A
	Proposed High VSL	N/A
	Proposed Severe VSL	The Planning Coordinator failed to respond to written comments submitted by UFLS entities and Transmission Owners within its Planning Coordinator area following a comment period and before finalizing its UFLS program, indicating in the written response to comments whether changes were made or reasons why changes were not made to the items in Parts 14.1 through 14.3.
	FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	*The VSLs for the stated requirement are not based on numeric gradations. As written, the VSL assignments comply with Guideline 1, because the VSLs do not have the unintended consequence of lowering the current or historic level of compliance.*
	FERC VSL G2 Violation Severity Level Assignments Should Ensure	*The VSL is written as a pass/fail VSL and contains a Severe in compliance with guideline 2A. The VSL is written in clear and unambiguous language, meeting Guideline 2B.*

	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	
	FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	*The VSL aligns with the language of the requirement, and does not add to nor take away from it.*
	FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	*The VSL is based on a single violation of the requirement.*

NERC's VRF Criteria:

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.

FERC's VRF Guidelines:

VRF G1 – 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. From footnote 15 of the May 18, 2007 Order, FERC's list of critical areas (from the Final Blackout Report) where violations could severely affect the reliability of the Bulk-Power System includes:

- 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.

VRF G2 – 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.

VRF G3 – 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.

VRF G4 – 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.

VRF G5 –Treatment of Requirements that Co-mingle More Than One Obligation

Where a single Requirement co-mingles a higher risk reliability objective and a lesser risk reliability objective, the VRF assignment for such Requirements must not be watered down to reflect the lower risk level associated with the less important objective of the Reliability Standard.

NERC's Criteria for VSLs:

Lower VSL	Moderate VSL	High VSL	Severe VSL
The performance or product measured almost meets the full intent of the requirement.	The performance or product measured meets the majority of the intent of the requirement.	The performance or product measured does not meet the majority of the intent of the requirement, but does meet some of the intent.	The performance or product measured does not substantively meet the intent of the requirement.

FERC's VSL Guidelines:

VSL G1: Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance (Compare the VSLs to any prior Levels of Non-compliance and avoid significant changes that may encourage a lower level of compliance than was required when Levels of Non-compliance were used.)

VSL G2: 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. Avoid using ambiguous terms such as "minor" and "significant" to describe noncompliant performance.)

VSL G3: Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement (VSLs should not expand on what is required in the requirement.)

VSL G4: Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations (. . . unless otherwise stated in the requirement, each instance of non-compliance with a requirement is a separate violation. Section 4 of the Sanction Guidelines states that assessing penalties on a per violation per day basis is the "default" for penalty calculations.)