

Violation Risk Factor and Violation Severity Level Justifications

MOD-001-2 – Available Transmission System Capability

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 MOD-001-2 – Available Transmission System Capability. Each requirement is assigned a VRF and a VSL. 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 Electric Reliability Organizations (ERO) Sanction Guidelines. The SDT applied the following NERC criteria and FERC Guidelines when proposing VRFs and VSLs for the requirements under this project.

NERC Criteria - Violation Risk Factors

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.

FERC Violation Risk Factor Guidelines**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:

- 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.

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.

NERC Criteria - Violation Severity Levels

Violation Severity Levels (VSLs) define the degree to which compliance with a requirement was not achieved. Each requirement must have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple “degrees” of noncompliant performance and may have only one, two, or three VSLs.

Violation severity levels should be based on NERC’s overarching criteria shown in the table below:

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 Order of Violation Severity Levels

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

VRF and VSL Justifications – MOD-001-2, Requirement R1	
Proposed VRF	LOWER
NERC VRF Discussion	<p>A VRF of “Lower” is assigned to this requirement.</p> <p>The reliability objective is for a Transmission Operator (TOP) to have a written methodology for determining Total Transfer Capability (TTC) or Total Flowgate Capability (TFC), which are the starting points for determinations of Available Transfer Capability (ATC) and Available Flowgate Capability (AFC). Although AFC and ATC values influence Real-time conditions and have the ability to impact Real-time operations, these values do not directly control the reliable operation of the Bulk-Power System. Accordingly, a violation of this requirement 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. A Lower VRF is thus appropriate.</p> <p>Additionally, currently effective Reliability Standards MOD-001-1a, MOD-028-2, MOD-029-1a, and MOD-030-2, which are being retired as part of this project, assign a Lower VRF to requirements addressing the documentation of TTC/TFC methodologies. The proposed Lower VRF is thus consistent with the VRFs for previous FERC approved requirements related to TTC/TFC determination.</p>
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report N/A.
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard The Lower VRF is applicable to all parts of the requirement.
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards

VRF and VSL Justifications – MOD-001-2, Requirement R1			
	<p>This requirement is similar to FERC approved MOD-028-2, Requirement R1 and MOD-029-1a, Requirement R2, which deals with TTC and were assigned a VRF of Lower. MOD-028-2 and MOD-029-1a are replaced by Requirement R1, and therefore the proposed Lower VRF is consistent with those in the previously approved standards.</p> <p>The VRF for Requirement R1 is also consistent with the Lower VRF assignment in FAC-013-2, which also contains requirements for documenting transfer capability.</p>		
FERC VRF G4 Discussion	<p>Guideline 4- Consistency with NERC Definitions of VRFs</p> <p>A violation of this requirement 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.</p>		
FERC VRF G5 Discussion	<p>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</p> <p>The proposed requirement has a single objective, to ensure that a TOP documents its TTC or TFC methodology and accounts for relevant operating limits and system conditions. Therefore, the requirement has one VRF that is appropriate for its single obligation.</p>		
Proposed VSL			
Lower	Moderate	High	Severe
<p>Each Transmission Operator that determines TFC or TTC has not described its method for accounting for one of the limitations listed in part 1.1 in its written methodology. (1.1)</p> <p>OR</p>	<p>Each Transmission Operator that determines TFC or TTC has not described its method for accounting for two of the limitations listed in part 1.1 in its written methodology. (1.1)</p> <p>OR</p>	<p>Each Transmission Operator that determines TFC or TTC has not described its method for accounting for any of the limitations listed in part 1.1 in its written methodology. (1.1)</p> <p>OR</p>	<p>Each Transmission Operator that determines TFC or TTC did not develop a written methodology for describing its current practices for determining TFC or TTC values.</p> <p>OR</p>

VRF and VSL Justifications – MOD-001-2, Requirement R1			
<p>Each Transmission Operator that determines TFC or TTC has not described its method for accounting for one of the element listed in part 1.2 in its written methodology, provided that element impacts its TFC or TTC determination. (1.2)</p>	<p>Each Transmission Operator that determines TFC or TTC has not described its method for accounting for two, three, or four elements listed in part 1.2 in its written methodology, provided those elements impacts its TFC or TTC determination. (1.2)</p>	<p>Each Transmission Operator that determines TFC or TTC has not described its method for accounting for five, six, or seven elements of listed in part 1.2 in its written methodology, provided those elements impacts its TFC or TTC determination. (1.2)</p> <p>OR</p> <p>Each Transmission Operator that determines TFC or TTC has not described the process for including any reliability-related constraints that have been requested by another Transmission Operator, provided the constraints are also used in the requesting Transmission Operator’s TFC or TTC calculation and the request referenced part 1.3. (1.3)</p> <p>OR</p>	<p>Each Transmission Operator that determines TFC or TTC developed a written methodology for determining TFC or TTC but the methodology did not reflect its current practices for determining TFC or TTC values.</p>

VRF and VSL Justifications – MOD-001-2, Requirement R1			
		Each Transmission Operator that determines TFC or TTC has not used (i) an impact test process for including requested constraints, (ii) a process to account for requested constraints that have a five percent or greater distribution factor for a transfer between areas in the TTC determination, or (iii) a mutually agreed upon method for determining whether requested constraints need to be included in the TFC or TTC determination. (1.3.1, 1.3.2, 1.3.3)	
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The VSLs assigned to this requirement do not lower the current levels of compliance.		
FERC VSL G2 Violation Severity Level Assignments Should Ensure	Guideline 2a: The proposed VSL is not binary.		

VRF and VSL Justifications – MOD-001-2, Requirement R1	
<p>Uniformity and Consistency in the Determination of Penalties</p> <p>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent</p> <p>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2b:</p> <p>The proposed VSL does not use ambiguous terms, supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3</p> <p>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSLs are worded consistently with the corresponding requirement.</p>
<p>FERC VSL G4</p> <p>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>The VSLs are based on a single violation, not cumulative violations.</p>

VRF and VSL Justifications – MOD-001-2, Requirement R2

Proposed VRF	LOWER
NERC VRF Discussion	<p>A VRF of “Lower” is assigned to this requirement.</p> <p>The reliability objective is to ensure that a TSP has a written methodology for determining Available Transfer Capability (ATC) or Available Flowgate Capability (AFC). Although AFC and ATC values influence Real-time conditions and have the ability to impact Real-time operations, these values do not directly control the reliable operation of the Bulk-Power System. A violation of this requirement 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. As such, a Lower VRF is appropriate.</p> <p>Additionally, currently effective Reliability Standards MOD-001-1a, MOD-028-2, MOD-029-1a, and MOD-030-2, which are being retired as part of this project, assign VRFs of Lower for requirements related to the documentation of ATC/AFC methodologies. This proposed Lower VRF is thus consistent with previously FERC approved requirements.</p>
FERC VRF G1 Discussion	<p>Guideline 1- Consistency w/ Blackout Report N/A.</p>
FERC VRF G2 Discussion	<p>Guideline 2- Consistency within a Reliability Standard The Lower VRF is applicable to all parts of the requirement.</p>
FERC VRF G3 Discussion	<p>Guideline 3- Consistency among Reliability Standards This requirement is similar to FERC approved MOD-028-2 Requirement R1 and MOD-030-2 Requirement R1, which deal with TSPs that determine ATC to develop an ATCID and were assigned a VRF of Lower. MOD-028-2 and MOD-030-2 will be replaced by Requirement R2, and therefore the Lower VRF is consistent with the previously approved standards.</p>

VRF and VSL Justifications – MOD-001-2, Requirement R2			
	FAC-013-2 also contains similar requirements for documenting transfer capability and aligns with the proposed Lower VRFs in MOD-001-2. There are no other standards addressing this issue.		
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs A violation of this requirement 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 G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation The proposed requirement has a single objective, which is that a TSP’s ATC or AFC methodology must be documented for those registered entities that determine ATC or AFC values and the document is to reflect current practices. Therefore, the requirement has one VRF that is appropriate for its single obligation.		
Proposed VSL			
Lower	Moderate	High	Severe
Each Transmission Service Provider that determines AFC or ATC has not described its method for accounting for one of the elements listed in part 2.1 in its written methodology, provided that element impacts its AFC or ATC determination. (2.1)	Each Transmission Service Provider that determines AFC or ATC has not described its method for accounting for two, three, or four elements listed in part 2.1 in its written methodology, provided the elements impact its AFC or ATC determination. (2.1)	Each Transmission Service Provider that determines AFC or ATC has not described its method for accounting for five, six, or seven elements listed in part 2.1 in its written methodology, provided the elements impact its AFC or ATC determination. (2.1) OR Each Transmission Service Provider that uses the Flowgate Methodology did not use the AFC	Each Transmission Service Provider that determines AFC or ATC did not develop an ATCID describing its AFC or ATC methodology. OR Each Transmission Service Provider that determines AFC or ATC did not reflect its current practices for determining AFC or ATC values in its ATCID.

VRF and VSL Justifications – MOD-001-2, Requirement R2

		determined by the Transmission Service Provider for reliability-related constraints identified in part 1.3. (2.2)	
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VRF and VSL Justifications – MOD-001-2, Requirement R2	
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The VSLs assigned to this requirement do not lower the current levels of compliance.</p>
<p>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</p>	<p>Guideline 2a: The proposed VSL is not binary.</p> <p>Guideline 2b: The proposed VSL does not use ambiguous terms, supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>

VRF and VSL Justifications – MOD-001-2, Requirement R2	
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL is worded consistently with the corresponding requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>The VSLs are based on a single violation, not cumulative violations.</p>

VRF and VSL Justifications – MOD-001-2, Requirement R3	
Proposed VRF	LOWER
NERC VRF Discussion	<p>A VRF of “Lower” is assigned to this requirement.</p> <p>The reliability objective is to ensure that a TSP that determines Capacity Benefit Margin (CBM), a component of ATC/AFC values, documents its methodology for developing its CBM values, which is an important aspect of the TSP’s ability to communicate to TOPs how its AFC or ATC value was determined.</p> <p>As noted above, because ATC/AFC do not directly control the reliable operation of the Bulk-Power System, a VRF of Lower is appropriate. Furthermore, the proposed Lower VRF is consistent with the FERC approved MOD-004-1, in which the VRF is Lower for TSPs that maintain CBM.</p>
FERC VRF G1 Discussion	<p>Guideline 1- Consistency w/ Blackout Report</p> <p>N/A.</p>
FERC VRF G2 Discussion	<p>Guideline 2- Consistency within a Reliability Standard</p> <p>Requirement R3 does not have any sub-parts or sub-requirements. The Lower VRF is applicable to the entire requirement.</p>
FERC VRF G3 Discussion	<p>Guideline 3- Consistency among Reliability Standards</p> <p>The proposed Lower VRF is consistent with Lower VRF in FERC approved MOD-004-1, which requires TSPs that maintain CBM to prepare and keep current a CBMID. MOD-004-1 will be retired upon approval of MOD-001-2. There are no other standards addressing this issue.</p>
FERC VRF G4 Discussion	<p>Guideline 4- Consistency with NERC Definitions of VRFs</p> <p>A violation of this requirement 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.</p>
FERC VRF G5 Discussion	<p>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</p>

VRF and VSL Justifications – MOD-001-2, Requirement R3			
		The proposed requirement has a single objective, to ensure that a TSP documents its CBM methodology in an implementation document and ensure the document reflects current practices. Therefore, the requirement has one VRF for its single obligation.	
Proposed VSL			
Lower	Moderate	High	Severe
None.	None.	None.	Each Transmission Service Provider that determines CBM values did not develop a CBMID describing its method for determining CBM values. OR Each Transmission Service Provider that determines CBM values did not reflect its current practices for determining CBM values in its CBMID.

VRF and VSL Justifications – MOD-001-2, Requirement R3	
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The VSLs assigned to this requirement do not lower the current levels of compliance.</p>
<p>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</p>	<p>Guideline 2a: The proposed VSL is binary, and therefore, a single severe VSL is necessary.</p> <p>Guideline 2b: The proposed VSL does not use ambiguous terms, supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>

VRF and VSL Justifications – MOD-001-2, Requirement R3	
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL is worded consistently with the corresponding requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>The VSLs are based on a single violation, not cumulative violations.</p>

VRF and VSL Justifications – MOD-001-2, Requirement R4	
Proposed VRF	LOWER
NERC VRF Discussion	<p>A VRF of “Lower” is assigned to this requirement.</p> <p>The reliability objective is to ensure that TOPs that determine Transmission Reliability Margin (TRM) values, a component of ATC/AFC, document their methodology for determining the TRM values for use in the TSP’s determination of AFC and ATC.</p> <p>As noted above, because ATC/AFC do not directly control the reliable operation of the Bulk-Power System, a VRF of Lower is appropriate. Furthermore, the proposed VRF is consistent with the VRF for the FERC approved version of MOD-008-1, which is Lower for TOPs that maintain TRM.</p>
FERC VRF G1 Discussion	<p>Guideline 1- Consistency w/ Blackout Report N/A.</p>
FERC VRF G2 Discussion	<p>Guideline 2- Consistency within a Reliability Standard Requirement R4 contains one VRF for the single obligation for a TOP that determines TRM to document its methodology to determine TRM.</p>
FERC VRF G3 Discussion	<p>Guideline 3- Consistency among Reliability Standards The proposed Lower VRF is consistent with the Lower VRF in FERC approved MOD-008-1, which requires TOPs that maintain TRM to prepare and keep current a TRMID. MOD-008-1 will be retired upon approval of MOD-001-2. There are no other standards addressing this issue.</p>
FERC VRF G4 Discussion	<p>Guideline 4- Consistency with NERC Definitions of VRFs A violation of this requirement 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.</p>
FERC VRF G5 Discussion	<p>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation The proposed requirement has a single objective, to ensure that a TOP documents its TRM methodology in an implementation document and ensure the document reflects current practices. Therefore, the requirement has one VRF for its single obligation.</p>

VRF and VSL Justifications – MOD-001-2, Requirement R4			
Proposed VSL			
Lower	Moderate	High	Severe
None.	None.	None.	<p>Each Transmission Operator that determines TRM values did not develop a TRMID describing its method for determining TRM values.</p> <p>OR</p> <p>Each Transmission Operator that determines TRM values did not reflect its current practices for determining TRM values in its TRMID.</p>

VRF and VSL Justifications – MOD-001-2, Requirement R4	
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The VSLs assigned to this requirement do not lower the current levels of compliance.</p>
<p>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</p>	<p>Guideline 2a: The proposed VSL is binary, and therefore, a single severe VSL is necessary. Guideline 2b: The proposed VSL does not use ambiguous terms, supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>

VRF and VSL Justifications – MOD-001-2, Requirement R4	
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL is worded consistently with the corresponding requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>The VSLs are based on a single violation, not cumulative violations.</p>

VRF and VSL Justifications – MOD-001-2, Requirement R5	
Proposed VRF	LOWER
NERC VRF Discussion	<p>A VRF of “Lower” is assigned to this requirement.</p> <p>The purpose of the requirement is for a TSP or TOP to provide or clarify an element of its TFC or TTC methodology, ATCID, CBMID, or TRMID, within 45 days of a request. The Lower VRF is appropriate because the failure for a TOP or TSP to respond to requests on their methodology document(s) in a timely manner would not put the BES in any immediate risk situation.</p>
FERC VRF G1 Discussion	<p>Guideline 1- Consistency w/ Blackout Report N/A.</p>

VRF and VSL Justifications – MOD-001-2, Requirement R5			
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard The VRF is applicable to all parts of the requirement.		
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards This proposed Lower VRF is consistent with the VRF assigned to similar Reliability Standards, including: FAC-008-3 Requirement R5, which requires TOs or GOs to provide a response to a requesting registered entity on its Facility Ratings methodology; FAC-010-2.1 Requirement R5, which requires a Planning Authority to provide a response to an information request to its System Operating Limit (SOL) methodology; FAC-011-2 Requirement R5, which requires the Reliability Coordinator to provide a response to an information request of its SOL methodology; and FAC-013-2 Requirements R3 and R5, which require a Planning Coordinator to provide a response to an information request of its Transfer Capability methodology or assessment results.		
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs A violation of this requirement 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 G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation The proposed requirement has a single objective, which is information sharing on requests for clarification of a registered entity’s methodologies and determinations of TTC, TFC, ATC, AFC, CBM, or TRM. The requirement has one VRF for its single obligation.		
Proposed VSL			
Lower	Moderate	High	Severe
Each Transmission Operator or Transmission Service Provider did not respond in writing to a written request by one or more of the registered entities	Each Transmission Operator or Transmission Service Provider did not respond in writing to a written request by one or more of the registered entities	Each Transmission Operator or Transmission Service Provider did not respond in writing to a written request by one or more of the registered entities specified in	Each Transmission Operator or Transmission Service Provider failed to respond in writing to a written request by one or more of

VRF and VSL Justifications – MOD-001-2, Requirement R5			
specified in Requirement R5 within 45 calendar days from the date of the request, but did respond in writing within 75 calendar days.	specified in Requirement R5 within 76 calendar days from the date of the request, but did respond in writing within 105 calendar days.	Requirement R5 within 106 calendar days from the date of the request, but did respond in writing within 135 calendar days.	the registered entities specified in Requirement R5.

VRF and VSL Justifications – MOD-001-2, Requirement R5	
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The VSLs assigned to this requirement do not lower the current levels of compliance.</p>
<p>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</p>	<p>Guideline 2a: The proposed VSL is not binary.</p> <p>Guideline 2b: The proposed VSL does not use ambiguous terms, supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL is worded consistently with the corresponding requirement.</p>

VRF and VSL Justifications – MOD-001-2, Requirement R5	
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>The VSLs are based on a single violation, not cumulative violations.</p>

VRF and VSL Justifications – MOD-001-2, Requirement R6	
Proposed VRF	LOWER
NERC VRF Discussion	<p>A VRF of “Lower” is assigned to this requirement.</p> <p>The purpose of the requirement is for a registered entity to provide data related to its AFC, ATC, TFC, or TTC determinations to other entities that need such data for their own determinations. The VRF of Lower is appropriate because a failure for a TOP or TSP to respond to requests for data on their ATC equation determinations in a timely manner would not put the BES in any immediate risk situation.</p>
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report N/A.
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard The VRF is consistent for all parts of the requirement.
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards

VRF and VSL Justifications – MOD-001-2, Requirement R6			
	This proposed Lower VRF is consistent with VRFs for similar Reliability Standards, including, FAC-013-2 Requirement R6, which requires Planning Coordinator to provide data to support the assessment results on transfer simulations within 45 calendar days of a request.		
FERC VRF G4 Discussion	<p>Guideline 4- Consistency with NERC Definitions of VRFs</p> <p>A violation of this requirement 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.</p>		
FERC VRF G5 Discussion	<p>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</p> <p>The proposed requirement has a single objective to ensure that TOPs and TSPs share their data related to ATC/AFC, TTC/TFC, CBM and TRM determinations with other TOPs and TSPs that need such data to conduct their own determinations.</p>		
Proposed VSL			
Lower	Moderate	High	Severe
Each Transmission Operator or Transmission Service Provider did not respond to a written request for data by one or more of the registered entities specified in Requirement R6 by making the requested data available within in 45 calendar days from the date of the request, but did respond within 75 calendar days.	Each Transmission Operator or Transmission Service Provider did not respond to a written request for data by one or more of the registered entities specified in Requirement R6 by making data available within 76 calendar days from the date of the request, but did respond within 105 calendar days.	Each Transmission Operator or Transmission Service Provider did not respond to a written request by one or more of the registered entities specified in Requirement R6 by making data available within 106 calendar days from the date of the request, but did respond within 135 calendar days.	Each Transmission Operator or Transmission Service Provider failed to respond to a written request for data by making data available to one or more of the entities specified in Requirement R6.

VRF and VSL Justifications – MOD-001-2, Requirement R6	
<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>The VSLs assigned to this requirement do not lower the current levels of compliance.</p>
<p>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</p>	<p>Guideline 2a: The proposed VSL is not binary.</p> <p>Guideline 2b: The proposed VSL does not use ambiguous terms, supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>

VRF and VSL Justifications – MOD-001-2, Requirement R6	
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL is worded consistently with the corresponding requirement.</p>
<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>The VSLs are based on a single violation, not cumulative violations.</p>