Review of IRO-015-1—Notifications and Information Exchange Between Reliability Coordinators (Filing 2)
http://www.nerc.com/files/IRO-015-1.pdf

VSLs for Requirement R1:

Standard, Require-ment	Requirement Language	Lower	Moderate	High	Severe	Comments
IRO-015-1, R1	The Reliability Coordinator shall follow its Operating Procedures, Processes, or Plans for making notifications and exchanging reliability-related information with other Reliability Coordinators. **R1.1** The Reliability Coordinator shall make notifications to other Reliability Coordinators of conditions in its Reliability Coordinator Area that may impact other Reliability Coordinator Areas.	The Reliability Coordinator failed to notify 5% or less of the other Reliability Coordinators of conditions in its Reliability Coordinator Area that may impact them as per R1.1. ~~OR~~ ~~The Reliability Coordinator failed to follow its Operating Procedures, Processes, or Plans for making notifications and exchanging reliability-~~	The Reliability Coordinator failed to notify more than 5% up to (and including) 10% of the other Reliability Coordinators of conditions in its Reliability Coordinator Area that may impact them as per R1.1.	The Reliability Coordinator failed to notify more than 10% up to (and including) 15% of the other Reliability Coordinators of conditions in its Reliability Coordinator Area that may impact them as per R1.1.	The Reliability Coordinator failed to notify more than 15% of the other Reliability Coordinators of conditions in its Reliability Coordinator Area that may impact them as per R1.1. OR The Reliability Coordinator failed to follow its Operating Procedures, Processes, or Plans for making notifications and exchanging reliability-related information with	Citing a Guideline 2 issue, FERC staff stated that if the main requirement (originally addressed in the second half of the Lower VSL) is binary, it should fall into a higher category. NERC staff agreed and believes that because the main requirement is of a binary nature (though the whole set of VSLs is not binary), it is more appropriately assigned as Severe.

		~~related information with other Reliability Coordinators.~~			other Reliability Coordinators.	

Original Guideline Explanation for R1 VSLs in December 1, 2010 VSL Filing 2:

In accordance with Guideline 2, the VSLs were modified for clarity and consistency with other standards and VSLs. Consistent with Guidelines filed with FERC on August 10, 2009, NERC incorporated the subrequirements into the main requirement VSL so that compliance is based on meeting criteria specified in components.

- *Guideline 1:* The VSLs included in this filing have been modified for clarity and consistency. However, the VSLs have not changed significantly over time. Although proposed for modification, the VSLs as modified do not signal a lower compliance threshold than previously existed. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.
- *Guideline 2:* The VSLs comply with Guideline 2. The requirement has gradated VSL; therefore, Guideline 2a is not applicable. The gradated VSls ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Therefore, no changes were required for consistency with FERC Guideline 2. Additionally, NERC has reviewed the VSL text and has determined that, with the correction of typographical errors, stylistic edits or format changes, the VSL text is clear, specific and objective and does not contain general, relative or subjective language satisfying Guideline 2b. Thus, the text is not subject to the possibility of multiple interpretations of the VSL(s) and provides the clarity needed to permit the consistent and objective application of the VSL(s) in the determination of penalties by the Compliance Enforcement Authority.
- *Guideline 3:* NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability goal. In accordance with Guideline 3, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.
- *Guideline 4:* The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.