

## Review of TOP-006-2—Monitoring System Conditions (Filing 2)

<http://www.nerc.com/files/TOP-006-2.pdf>

### VSLs for Requirement R2:

Standard, Requirement	Requirement Language	Lower	Moderate	High	Severe	Comments
TOP-006-2, R2	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall monitor applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.	The responsible entity failed to monitor <del>13</del> % or less of applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.	The responsible entity failed to monitor more than <del>13</del> % up to (and including) <del>26</del> % of applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.	The responsible entity failed to monitor more than <del>26</del> % up to (and including) <del>39</del> % of applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.	The responsible entity failed to monitor more than <del>39</del> % of applicable transmission line status, real and reactive power flows, voltage, load-tap-changer settings, and status of rotating and static reactive resources.	<p>Citing a Guideline 1 concern, FERC staff believes the percentage distribution is not appropriate. Because entities monitor thousands of these elements, almost every violation would end up being classified as a Lower VSL.</p> <p>NERC staff agrees that the percentages chosen are inappropriate, both because thousands of elements would be involved and because</p>

						monitoring is routine task that entities should be accustomed to performing. Staff has modified the percentages accordingly.
--	--	--	--	--	--	--

### Original R2 Guideline Explanation in the [December 1, 2010 VSL Filing](#):

In accordance with Guideline 2, the VSLs were modified for clarity and consistency with other standards and VSLs.

- *Guideline 1:* See P. 1025-1027 of the [Guideline 1 Analysis Filing](#).
- *Guideline 2:* The VSLs were modified for clarity and consistency with other standards and VSLs. Additionally, NERC has reviewed the VSL text and has determined that, as written, 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 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 reliability goal of the requirement. 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.

### VSLs for Requirement R3:

Standard, Requirement	Requirement Language	Lower	Moderate	High	Severe	Comments
TOP-006-2, R3	Each Reliability Coordinator, Transmission	<del>The responsible entity failed to provide 1% or less</del>	<del>The responsible entity failed to provide more</del>	The responsible entity failed to	The responsible entity failed to provide <del>more</del>	Citing a Guideline 1 concern, FERC staff believes the

	<p>Operator, and Balancing Authority shall provide appropriate technical information concerning protective relays to their operating personnel.</p>	<p><del>of the appropriate technical information concerning protective relays to its operating personnel. N/A</del></p>	<p><del>than 1% up to (and including) 2% of the appropriate technical information concerning protective relays to its operating personnel. N/A</del></p>	<p>provide <del>more than 2% up to (and including) 3%</del> of the appropriate technical information concerning protective relays to <u>all of</u> its operating personnel.</p>	<p><del>than 3% of the</del> appropriate technical information concerning protective relays to <u>any of</u> its operating personnel.</p>	<p>percentage distribution is not appropriate. FERC recommended either making the VSLs binary or qualifying the percentage of relays with a failure, rather than the percentage of technical information.</p> <p>NERC staff agrees that the percentages chosen are inappropriate because so many elements would be involved. <del>Staff and cannot determine another non-subjective way to graduate beyond "all" versus "some."</del> NERC has modified the <del>percentages VSLs</del> accordingly. <del>NERC staff does not</del></p>
--	---	---	--	---	---	---

						believe that basing the VSLs on the percentage of relays with a failure is appropriate, given the language in the requirement.
--	--	--	--	--	--	--

**Original R3 Guideline Explanation in the [December 1, 2010 VSL Filing](#):**

In accordance with Guideline 2, the VSLs were modified for clarity and consistency with other standards and VSLs.

- *Guideline 1:* See P. 1025-1027 of the [Guideline 1 Analysis Filing](#).
- *Guideline 2:* The VSLs were modified for clarity and consistency with other standards and VSLs. Additionally, NERC has reviewed the VSL text and has determined that, as written, 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 reliability goal of the requirement. 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.