# UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

VERSION TWO FACILITIES DESIGN,	)	
CONNECTIONS AND MAINTENANCE	)	<b>Docket Nos. RM08-11-002</b>
RELIABILITY STANDARDS	)	RM08-11-003

# COMPLIANCE FILING OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION IN RESPONSE TO DECEMBER 7, 2010 ORDER APPROVING NERC'S MAY 29, 2010 AND JULY 6, 2010 COMPLIANCE FILINGS IN RESPONSE TO ORDER NO. 722

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January 6, 2011

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#### I. INTRODUCTION

The North American Electric Reliability Corporation ("NERC"), in compliance with the directive in the Federal Energy Regulatory Commission's ("FERC" or the "Commission") December 7, 2010 Letter Order<sup>1</sup> approving NERC's May 29, 2009 and July 6, 2009 Compliance Filings in response to Order No. 722 in Docket No. RM08-11-002 and RM08-11-003, hereby submits this filing to correct three errors that were inadvertently included in the VSLs filed by NERC for the FAC-014-2 — Establish and Communicate System Operating Limits Reliability Standard on May 29, 2009. Exhibit A to this filing lists the VSLs that are being corrected, and the associated Reliability Standard and Requirements for each revised VSL. Exhibit B to this filing includes a redline of the VSLs being corrected in this filing from the last-filed version of the VSLs (filed on May 29, 2010) that were approved by the Commission in its December 7, 2010 Letter Order. The full matrix of VSLs is posted on NERC's website at http://www.nerc.com/page.php?cid=2|20.

<sup>&</sup>lt;sup>1</sup> December 7, 2010 Letter Order Re: Version Two Facilities Design, Connections and Maintenance Reliability Standards, Docket Nos. RM08-11-002 and RM08-11-003 (December 7, 2010). <sup>2</sup> Version Two Facilities Design, Connections and Maintenance Reliability Standards, (Order No. 722), 126 FERC ¶

<sup>61,255 (2009).</sup> 

#### II. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the following:

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#### III. REVISIONS TO VIOLATION SEVERITY LEVELS

In Order No. 722, the Commission approved the VSLs assigned to several FAC Reliability Standards but directed NERC to file specific revisions to the VSLs for certain of the approved standards. On May 29, 2009<sup>3</sup> and July 6, 2009,<sup>4</sup> NERC filed revised VSLs for the approved FAC Reliability Standards in accordance with the Commission's directives in Order No. 722. The May 29, 2009 filing included specific revisions to the VSLs for the FAC-014-2 Reliability Standard.

On December 7, 2010, FERC issued a Letter Order accepting NERC's May 29, 2009 and July 6, 2009 filings, but directed that NERC submit an additional compliance filing within thirty

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<sup>&</sup>lt;sup>3</sup> Version Two Facilities Design, Connections and Maintenance Reliability Standards; Compliance Filing of the North American Electric Reliability Corporation in Response to Order No. 722 – Version Two Facilities Design, Connections and Maintenance Reliability Standards, Docket No. RM08-11-000 (May 29, 2009).

<sup>&</sup>lt;sup>4</sup> Version Two Facilities Design, Connections and Maintenance Reliability Standards; Compliance Filing of the North American Electric Reliability Corporation in Response to Paragraphs 99 and 100 of Order No. 722 – Version Two Facilities Design, Connections and Maintenance Reliability Standards, Docket No. RM08-11-000 (July 6, 2009).

days correcting the typographical inconsistencies that were included in the VSLs for FAC-014-2, Requirements R1, R3, and R4 included in NERC's May 29, 2009 filing. Accordingly, NERC hereby submits this filing to correct the three typographical inconsistencies that were inadvertently included in the May 29, 2009 filing. The VSLs included herein for Commission approval were approved by NERC's Board of Trustees on May 6, 2009.

#### IV. CONCLUSION

The North American Electric Reliability Corporation respectfully requests that the Commission accept this Compliance Filing in accordance with the Commission's directives in the December 7, 2010 Letter Order, and approve the corrected VSLs for Reliability Standard FAC-014-2, Requirements R1, R3, and R4, included in **Exhibit A** to this filing.

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Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 6th day of January, 2011.

/s/ Holly A. Hawkins
Holly A. Hawkins
Attorney for North American Electric
Reliability Corporation

# Exhibit A

# Revisions to Violation Severity Levels For Approved Reliability Standards (CLEAN)

Standard Number, Requirement Number, Requirement Text	Lower VSL	Moderate VSL	High VSL	Severe VSL
FAC-014-2 R1. The Reliability Coordinator shall ensure that SOLs, including Interconnection Reliability Operating Limits (IROLs), for its Reliability Coordinator Area are established and that the SOLs (including Interconnection Reliability Operating Limits) are consistent with its SOL Methodology.	There are SOLs, for the Reliability Coordinator Area, but from 1% up to but less than 25% of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R1)	There are SOLs, for the Reliability Coordinator Area, but 25% or more, but less than 50% of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R1)	There are SOLs, for the Reliability Coordinator Area, but 50% or more, but less than 75% of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R1)	There are SOLs for the Reliability Coordinator Area, but 75% or more of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R1)
FAC-014-2 R3. The Planning Authority shall establish SOLs, including IROLs, for its Planning Authority Area that are consistent with its SOL Methodology.	There are SOLs, for the Planning Coordinator Area, but from 1% up to, but less than, 25% of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R3)	Coordinator t from 1% up to, than, 25% of DLs are ent with the Coordinator's Planning Coordinator Area, but 25% or more, but less than 50% of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R3)  Planning Coordinator Area, but 50% or more, but less than 75% of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R3)		There are SOLs, for the Planning Coordinator Area, but 75% or more of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R3)
FAC-014-2 R4. The Transmission Planner shall establish SOLs, including IROLs, for its Transmission Planning Area that are consistent with its Planning Authority's SOL Methodology.	SOLs for its portion of the Planning Planning Coordinator Area, but 25% or Area, but up to 25% of anning these SOLs are portion of the Planning portion of the Reliability Coordinator Area, but 25% or more, but less than 50% of these SOLs are inconsistent these SOLs are inconsistent		The Transmission Planner has established SOLs for its portion of the Planning Coordinator Area, but 75% or more of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R4)	

# Exhibit B

Revisions to Violation Severity Levels

For Approved Reliability Standards (REDLINE)

Standard Number, Requirement Number, Requirement Text	Lower VSL	Moderate VSL	High VSL	Severe VSL
FAC-014-2 R1. The Reliability Coordinator shall ensure that SOLs, including Interconnection Reliability Operating Limits (IROLs), for its Reliability Coordinator Area are established and that the SOLs (including Interconnection Reliability Operating Limits) are consistent with its SOL Methodology.	There are SOLs, for the Reliability Coordinator Area, but from 1% up to but less than 25% of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R1)	There are SOLs, for the Reliability Coordinator Area, but 25% or more, but less than 50% of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R1)	There are SOLs, for the Reliability Coordinator Area, but 50% or more, but less than 75% of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R1)	There are SOLs for the Reliability Coordinator Area, but one-75% or more of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology. (R1)
FAC-014-2 R3. The Planning Authority shall establish SOLs, including IROLs, for its Planning Authority Area that are consistent with its SOL Methodology.	There are SOLs, for the Planning Coordinator Area, but from 1% up to, but less than, 25% of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R3)	There are SOLs, for the Planning Coordinator Area, but 25% or more, but less than 50% of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R3)	There are SOLs for the Planning Coordinator Area, but 4050% or more, but less than 75% of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R3)	There are SOLs, for the Planning Coordinator Area, but 75% or more of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R3)
FAC-014-2 R4. The Transmission Planner shall establish SOLs, including IROLs, for its Transmission Planning Area that are consistent with its Planning Authority's SOL Methodology.	The Transmission Planner has established SOLs for its portion of the Planning Coordinator Area, but up to 25% of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R4)	The Transmission Planner has established SOLs for its portion of the Planning Coordinator Area, but 25% or more, but less than 50% of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R4)	The Transmission Planner has established SOLs for its portion of the Reliability Coordinator Area, but 50% or more, but less than 75% of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R4)	The Transmission Planner has established SOLs for its portion of the Planning Coordinator Area, but ene 75% or more of these SOLs are inconsistent with the Planning Coordinator's SOL Methodology. (R4)