UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION	**) Docket Nos. RR08-4-000**	
	)	**RR08-4-001**
	)	**RR08-4-002**

COMPLIANCE FILING OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION IN RESPONSE TO THE ORDER ON VIOLATION SEVERITY LEVELS PROPOSED BY THE ELECTRIC RELIABILITY ORGANIZATION AND REQUEST FOR AN EXTENSION OF TIME

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March 5, 2010

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I. INTRODUCTION

The North American Electric Reliability Corporation ("NERC"), in compliance with the directives in paragraphs 13, 41, 42, and 56 of the Federal Energy Regulatory Commission's ("FERC") June 19, 2008 Order, and paragraph 30 in the November 20, 2008 Order,[1] hereby submits this filing and accompanying reports documenting NERC's review of Violation Severity Level ("VSL") assignments for specific FERC-approved Reliability Standards to determine consistency with FERC's VSL assignment Guidelines 1, 2b, 3, and 4.[2]

This filing details the NERC VSL assignment review by the standards drafting team, NERC staff's conclusions and recommendations based on its independent review, and the resulting justifications and proposed revisions regarding the appropriate VSL assignments for each Reliability Standard requirement contained herein. The filing includes VSLs both for Reliability Standards that are pending at FERC and Reliability Standards previously approved by FERC. The VSLs included have been analyzed by the assigned standards drafting teams, reviewed by NERC staff, and balloted ("Filing 1"). A subsequent filing ("Filing 2") will address the VSLs that are not included in Filing 1. In general, Filing 1 contains the VSLs for the original set of 83 Reliability Standards approved by FERC and NUC-001-2, less VSLs for certain requirements that NERC has determined need further input and justification. In general, Filing 2 will contain the VSLs for the Reliability Standards submitted after the original set of Reliability Standards, plus those requirements that were excluded from Filing 1 because they needed further input and justification.

[1] *North American Electric Reliability Corp.*, 123 FERC ¶ 61,284 (2008) (the "June VSL Order"), *order on reh'g, North American Electric Reliability Corp.*, 125 FERC ¶ 61,212 (2008) ("November VSL Order").
[2] NERC submitted a filing in compliance with FERC Guideline 2a, on December 19, 2008, which was accepted by FERC on June 24, 2009.

VSLs to be included in Filing 2 will be posted for comment and a non-binding poll will be conducted, consistent with the NERC Rules of Procedure. These proposed VSLs will then be submitted to the NERC Board of Trustees and FERC for approval after completion of that process. To the extent necessary,[3] NERC requests an extension of time for the submittal of Filing 2, until the completion of that process, which NERC expects to conclude during the 3rd quarter of 2010.

Exhibit A of this filing contains a clean version of final proposed VSLs for the FERC-approved Reliability Standards considered in this review. By this filing, NERC is requesting FERC approval of the VSLs proposed in Exhibit A. **Exhibit B** to this filing contains the redline version of those same VSLs, demonstrating the revisions proposed in this filing, as compared to the last FERC-approved version of those VSLs.[4] **Exhibit C** to this filing, "Guideline 2b-4 VSL Assignment Review and Findings," documents each requirement for which VSL assignments included in this filing were reviewed, describes the issues addressed in the review, includes proposed revisions resulting from the review, and the conclusions regarding consistency of the assignments with FERC Guidelines 2b, 3, and 4.[5] **Exhibit D** to this filing contains the FERC-directed Guideline 1 VSL Review Report.[6] **Exhibit E** contains NERC's certification that it has reviewed each of the VSL assignments set forth herein for consistency with Guidelines 2b, 3 and 4, as directed by FERC.

[3] Pursuant to Rules 212 and 2008 of FERC's Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.2008 (2009).
[4] For ease of reference, this document contains the text of the applicable Reliability Standard requirements. In the event of a conflict between those included in the attachment and the FERC-approved version, the FERC-approved version prevails.
[5] For ease of reference, this document contains the text of the revised VSLs set forth in Exhibits A and B. In the event of a conflict, the text in Exhibits A and B prevails.
[6] The Guideline 1 VSL Review Report addresses the 83 original FERC-approved Reliability Standards and the NUC Reliability Standards. Certain of the VSLs identified in the report will be submitted as part of Filing 2.

With respect to the VSLs presented for approval herein, NERC believes this filing fully complies with paragraphs 13, 41, 42, and 56 of the June VSL Order, and paragraph 30 of the November VSL Order, requiring that NERC submit: 1) a report on its analysis with regard to Guideline 1 documenting whether the VSL assignments allow for a level of compliance lower than the historical performance, and 2) a compliance filing certifying that NERC has reviewed VSL assignments for consistency with Guidelines 2b, 3 and 4, validating that the assignments meet Guidelines 2b, 3, and 4, and proposing revisions to those that do not meet Guidelines 2b, 3, and 4. All other directives in the June VSL Order have been addressed by NERC previously in other compliance filings.[7]

II. NOTICES AND COMMUNICATIONS

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

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*Persons to be included on FERC's service list are indicated with an asterisk. NERC requests waiver of FERC's rules and regulations to permit the inclusion of more than two people on the service list.

[7] *See, e.g., North American Electric Reliability Corporation*, "Compliance Filing of the North American Electric Reliability Corporation in Response to Paragraph 47 of the Order on Violation Severity Levels Proposed by the Electric Reliability Organization," Docket No. RR08-04-000 (filed Dec. 19, 2008); "Compliance Filing of the North American Electric Reliability Corporation in Response to Paragraph 40 of the Order on Violation Severity Levels Proposed by the Electric Reliability Organization," Docket No. RR08-4-000 (filed July 21, 2008).

III. BACKGROUND

a. Regulatory Framework

Congress, through its enactment of the Energy Policy Act of 2005 (the "Act"),[8] entrusted FERC with the duties of approving and enforcing rules to ensure the reliability of the Nation's bulk power system, and with the duties of certifying an electric reliability organization ("ERO") that would be charged with developing and enforcing mandatory Reliability Standards, subject to FERC approval. Section 215 of the Act states that all users, owners and operators of the bulk power system in the United States will be subject to FERC-approved Reliability Standards.

b. VSL Orders

On March 3, 2008, NERC submitted a compliance filing containing a complete set of VSLs[9] for the original 83 FERC-approved Reliability Standard requirements and NUC-001-1.[10] In its June 19, 2008 VSL Order, responding to the March 3 NERC filing, FERC approved the VSLs for the 83 standards, directed certain modifications to VSL assignments, and described four guidelines that FERC developed to guide its evaluation of VSLs. FERC also ordered NERC to provide certain reports and compliance filings using the guidelines to bring the VSLs into compliance with the guidelines. The four FERC guidelines for evaluating VSLs include:

> **Guideline 1**: Violation Severity Level assignments should not have the unintended consequence of lowering the current level of compliance;
>
> **Guideline 2:** Violation Severity Level assignments should ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties;
>
> (a) the single VSL assignment category for "binary" requirements is not consistent;
> (b) the VSL assignments contain ambiguous language.

[8] Energy Policy Act of 2005, 16 U.S.C. §824o, Pub. L. No. 109-58, Title XII, Subtitle A, 119 Stat. 594, 941 (2005).
[9] The VSLs are a post-violation measurement of the degree to which a requirement was violated using four possible categories (Lower, Moderate, High, or Severe), and coupled with the Violation Risk Factor, establishes an initial base penalty range.
[10] *See* Order No. 693, *Mandatory Reliability Standards for the Bulk-Power System*, Order No. 693, FERC Stats. & Regs. ¶ 31,242, *order on reh'g*, Order No. 693-A, 120 FERC ¶ 61,053 (2007) (approving 83 Reliability Standards).

Guideline 3: Violation Severity Level assignments should be consistent with the corresponding requirement; and

Guideline 4: Violation Severity Level assignments should be based on a single violation, not on a cumulative number of violations.

With respect to Guidelines 2, 3 and 4, the June 19, 2008 VSL Order directed NERC to submit a compliance filing within six months of the date of the order, certifying that NERC reviewed each of the VSL assignments for consistency with the FERC guidelines by: 1) providing a description of how NERC performed its review; and 2) either validating the existing VSL designations, or proposing revisions to specific approved VSL assignments that NERC determines do not meet the FERC guidelines.

Under Guideline 1, FERC directed that the report should include a description of how NERC performed the historical analysis. Specifically, NERC must identify: (i) the requirement and its current VSL assignments; and (ii) summarize the requirement's historical performance data. Where NERC determines that VSL assignments are inconsistent with a requirement's historical performance data, FERC directed that NERC should submit either: (i) revised assignments that accurately reflect historical levels of compliance; or (ii) provide a justification of the current VSL assignment.

On July 21, 2008, NERC filed a request for clarification and rehearing on several aspects of the June VSL Order. In its November VSL Order, FERC clarified that NERC may use its Reliability Standards development process identified in the NERC Reliability Standards Development Procedure for the development of VSLs. In addition, FERC granted NERC an extension of nine-months, to September 18, 2009, to provide the reports[11] directed by the June

[11] This extension excluded Guideline 2a pertaining to the assignment of VSLs for binary "yes/no" requirements. Accordingly, NERC filed VSL changes relative to this guideline review in December, 2008.

VSL Order. Subsequently, on September 16, 2009, FERC granted NERC's request for an extension to March 1, 2010. On March 1, 2010, FERC granted an extension to March 5, 2010.

c. VSL Review

NERC assigned the responsibility for the review of VSLs relative to Guidelines 2, 3, and 4 for the original 83 FERC-approved VSLs and NUC-001-1 to Project 2007-23 — Violation Severity Level Standard Drafting Team ("VSLDT") and Project 2008-08 — EOP Violation Severity Level Revisions[12] Standard Drafting Team ("EOP VSLDT"). The EOP VSLDT posted its initial product in April 2008. In April 2009, both teams posted VSLs reflecting the FERC Guideline analysis for industry review. After an initial round of comments, the proposed VSLs were balloted initially and then through recirculation ballot in July and August, 2009, respectively. The following table provides the results of this activity.

VSL Ballot (by standard types)	Initial		Recirculation	
	Quorum (%)	Approval (%)	Quorum (%)	Approval (%)
Resource and Demand Balancing (BAL)	86.28	89.56	92.04	89.41
Critical Infrastructure Protection (CIP), Communications (COM), and Voltage & Reactive (VAR)	86.50	85.78	92.41	84.64
Facilities (FAC) and Modeling (MOD)	86.64	87.63	92.67	88.04
Interchange (INT), Personnel (PER), and Nuclear (NUC)	85.71	88.63	92.17	88.73
Interconnected Reliability Operations (IRO)	86.16	90.15	91.96	90.77
Protection and Control (PRC)	86.32	88.26	92.31	86.93
Transmission Operations (TOP)	86.40	89.14	92.11	88.26
Transmission Planning (TPL)	85.71	90.46	91.96	89.28
Emergency Preparedness and Operations (EOP)	87.98	87.31	92.70	85.80

[12] The EOP VSLDT was formed to focus specifically on the EOP standards. The VSLs for the EOP standards did not successfully ballot prior to the March 1, 2008 NERC filing, but were submitted in that filing in compliance with *North American Electric Reliability Corp.*, 119 FERC ¶ 61,248 (June 7, 2007 Order), *order on clarification*, 120 FERC ¶ 61,239 (2007).

The reasons cited for the negative ballots can be grouped into eight categories:

1. VSL language inconsistent with requirements;
2. Risk versus severity;
3. Opposed to binary approach;
4. Requests VSLs be balloted by requirement;
5. Changes inconsistent with guidelines 2b, 3 and 4;
6. Creates potential double jeopardy for non-compliance;
7. Punitive to smaller entities; and
8. Discriminatory towards Balancing Authorities.

The following table displays the number of ballots with negative comments grouped according to the above reasons for each Reliability Standard family.

Negative Comments for VSLs by Reason and Standard Family

Reason	Standard Family								
	BAL	CIP, COM, VAR	FAC MOD	INT PER NUC	IRO	PRC	TOP	TPL	EOP
1. Language and VSL consistency with requirements	1	10	4	9		5	4	1	4
2. Risk versus severity	2		3			2		3	4
3. Binary approach opposition	6	5	4	5	5	5	4	4	5
4. VSL balloting approach opposition	4	4	4	4	4	4	4	4	4
5. Guidelines 2b, 3 and 4 consistency	1			1	1		1		
6. Double jeopardy for compliance	4				4	4			
7. Punitive to smaller entities	1	2							6
8. Discriminatory to Balancing Authorities	4								

In addition to supporting the drafting team efforts, NERC staff conducted further independent analysis of the VSL assignments and justifications proposed by the drafting teams for consistency with the FERC Guidelines. NERC staff also performed the Guideline 1 evaluation.

Following this independent review, on November 3, 2009, NERC posted proposed changes to balloted VSLs for 60 requirements associated with the original 83 FERC-approved standards for industry comment. After considering industry comments, NERC restored VSLs for two requirements to the previously balloted language, and six additional requirements were identified for further VSL modifications, including basic edits and corrections.

In addition, several other Reliability Standards were approved by FERC after FERC's approval of the original 83 Reliability Standards. The VSLs associated with those Reliability Standards had not undergone the VSL consistency review relative to the FERC Guidelines. Subsequent NERC review of the VSLs with respect to the FERC guidelines identified the need for further modifications. These will be included in Filing 2. Filing 2 also will include VSLs for the original 83 Reliability Standards that were modified by NERC staff after the November 3, 2009 posting and comment period and therefore were not included in the set posted for comment on November 3, 2009. Finally, Filing 2 will include changes to certain of the VSLs included in the November 3, 2009 posting that were made as a result of comments and/or NERC staff review. Those proposed VSLs will be posted for industry comment and will be submitted for approval in Filing 2 upon completion of the NERC development process, as described above.

IV. RESPONSE TO DIRECTIVES IN VSL ORDER

In NERC's comprehensive review of VSL assignments following the FERC June 2008 VSL Order:

- Nearly 1,200 VSL assignments were reviewed for this filing;
- Nearly 750 VSL assignments were reviewed relative to the original 83 FERC-approved standards and NUC-001-1, of which nearly 500 VSL assignments are included in this Filing 1;
- Over 400 VSL assignments were revised to conform FERC guidelines as part of Filing 1;

- Over 80 VSL assignments included were not modified as a result of the guideline analyses; and
- Over 450 VSL assignments were also reviewed for new or revised versions of standards approved since the original standards were approved; these will be paired with about 250 VSL assignments from the original approved set of standards requiring further input and justification that are not included in Filing 1, resulting in over 700 VSL assignments to be included in Filing 2.

a. FERC VSL Guideline 1

In the June VSL Order, FERC directed NERC to file a report on historical performance, where NERC has historical performance data, and to compare that historical compliance for individual requirements with their assigned VSL to ensure that the VSL assignments do not reduce current levels of reliability. In the November VSL Order, FERC directed NERC to use both pre-2008 historical data and 2008 compliance data in its evaluation of assigned VSLs applying Guideline 1. NERC conducted this review and the resulting report is presented in **Exhibit D** of this filing. While NERC generally found that VSL assignments maintain the thresholds for non-compliance at least equivalent to the levels that were achieved under voluntary compliance, NERC also concluded that revisions of 13 Reliability Standard VSLs are appropriate relative to the Guideline 1 review. Such changes are identified in this report and will be included in Filing 2.

b. FERC VSL Guidelines 2b, 3 and 4

In the June VSL Order, FERC also directed NERC to submit a compliance filing certifying that it has reviewed each VSL Assignment for consistency with Guidelines 2b, 3 and 4, validating the assignments that meet Guidelines 2b, 3 and 4, and proposing revisions to those that do not meet Guidelines 2b, 3 and 4.

In accordance with Guideline 2b, NERC reviewed VSL assignments to determine the uniformity and consistency of VSLs. With respect to Guideline 3, NERC reviewed VSL

assignments to determine whether VSLs were consistent with, and did not undermine, corresponding Reliability Standard requirements. Regarding Guideline 4, NERC reviewed the VSLs to determine whether VSL assignments were based on a single violation of Reliability Standard requirements and not based on a cumulative number of violations of the same requirement over a period of time. **Exhibit C** contains the results of the review, and the explanations regarding proposed revisions to VSLs to comply with the referenced FERC Guidelines. **Exhibit E** contains the certification of NERC's Director of Standards that the requisite review for Guidelines 2b, 3 and 4 was undertaken.

V. CONCLUSION

NERC respectfully requests that FERC accept this filing as compliant with FERC's directives in the June VSL Order and the November VSL Order, and that FERC approve the revised VSL assignments set forth in **Exhibit A** of this filing effective upon FERC approval. To the extent necessary, NERC requests that FERC extend the time for submittal of Filing 2 as discussed above.

Respectfully submitted,

/s/ Rebecca J. Michael

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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 5th day of March, 2010.

/s/ Rebecca J. Michael
Rebecca J. Michael

Attorney for North American Electric Reliability Corporation

Exhibit A — Clean VSLs Proposed for Approval

Violation Severity Levels Matrix

Clean Version of VSLs Submitted for Approval

Violation Severity Level Matrix (BAL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
BAL-001-0.1a	R1.	Each Balancing Authority shall operate such that, on a rolling 12-month basis, the average of the clock-minute averages of the Balancing Authority's Area Control Error (ACE) divided by 10B (B is the clock-minute average of the Balancing Authority Area's Frequency Bias) times the corresponding clock-minute averages of the Interconnection's Frequency Error is less than a specific limit. This limit is a constant derived from a targeted frequency bound (separately calculated for each Interconnection) that is reviewed and set as necessary by the NERC Operating Committee. ***See Standard for Formula.***	The Balancing Authority Area's value of CPS1 is less than 100% but greater than or equal to 95%.	The Balancing Authority Area's value of CPS1 is less than 95% but greater than or equal to 90%.	The Balancing Authority Area's value of CPS1 is less than 90% but greater than or equal to 85%.	The Balancing Authority Area's value of CPS1 is less than 85%.

Violation Severity Level Matrix (BAL)

Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
BAL-001-0.1a	R2.	Each Balancing Authority shall operate such that its average ACE for at least 90% of clock-ten-minute periods (6 non-overlapping periods per hour) during a calendar month is within a specific limit, referred to as L_{10}. ***See Standard for Formula.***	The Balancing Authority Area's value of CPS2 is less than 90% but greater than or equal to 85%.	The Balancing Authority Area's value of CPS2 is less than 85% but greater than or equal to 80%.	The Balancing Authority Area's value of CPS2 is less than 80% but greater than or equal to 75%.	The Balancing Authority Area's value of CPS2 is less than 75%.
BAL-001-0.1a	R3.	Each Balancing Authority providing Overlap Regulation Service shall evaluate Requirement R1 (i.e., Control Performance Standard 1 or CPS1) and Requirement R2 (i.e., Control Performance Standard 2 or CPS2) using the characteristics of the combined ACE and combined Frequency Bias Settings.	N/A	N/A	N/A	The Balancing Authority providing Overlap Regulation Service failed to use a combined ACE and frequency bias.
BAL-002-0	R1.	Each Balancing Authority shall have access to and/or operate Contingency	N/A	N/A	The Balancing Authority did not operate Contingency Reserve to respond	The Balancing Authority did not have access to Contingency

Violation Severity Level Matrix (BAL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Reserve to respond to Disturbances. Contingency Reserve may be supplied from generation, controllable load resources, or coordinated adjustments to Interchange Schedules.			to a Disturbance.	Reserve to respond to a Disturbance.
BAL-002-0	R1.1.	A Balancing Authority may elect to fulfill its Contingency Reserve obligations by participating as a member of a Reserve Sharing Group. In such cases, the Reserve Sharing Group shall have the same responsibilities and obligations as each Balancing Authority with respect to monitoring and meeting the requirements of Standard BAL-002.	N/A	N/A	N/A	The Balancing Authority has elected to fulfill its Contingency Reserve obligations by participating as a member of a Reserve Sharing Group and the Reserve Sharing Group has not provided the same responsibilities and obligations as required of the responsible entity with respect to monitoring and meeting the requirements of Standard BAL-002.
BAL-002-0	R3.	Each Balancing Authority or Reserve Sharing Group shall	The Balancing Authority or Reserve Sharing Group's	The Balancing Authority or Reserve Sharing Group's	The Balancing Authority or Reserve Sharing Group's	The Balancing Authority or Reserve Sharing Group's

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		activate sufficient Contingency Reserve to comply with the DCS.	average percent recovery per the NERC DCS quarterly report was less than 100% but greater than or equal to 95%. OR The Balancing Authority or Reserve Sharing Group failed to review its probable contingencies to determine its prospective most severe single contingencies annually as specified in R3.1.	average percent recovery per the NERC DCS quarterly report was less than 95% but greater than or equal to 90%.	average percent recovery per the NERC DCS quarterly report was less than 90% but greater than or equal to 85%.	average percent recovery per the NERC DCS quarterly report was less than 85%. OR The Balancing Authority or Reserve Sharing Group failed to carry at least enough Contingency Reserve to cover the most severe single contingency as specified in R3.1.
BAL-002-0	R3.1.	As a minimum, the Balancing Authority or Reserve Sharing Group shall carry at least enough Contingency Reserve to cover the most severe single contingency. All Balancing Authorities and Reserve Sharing Groups shall review, no less frequently than annually, their probable	N/A	N/A	N/A	N/A

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		contingencies to determine their prospective most severe single contingencies.				
BAL-002-0	R4.1.	A Balancing Authority shall return its ACE to zero if its ACE just prior to the Reportable Disturbance was positive or equal to zero. For negative initial ACE values just prior to the Disturbance, the Balancing Authority shall return ACE to its pre-Disturbance value.	N/A	N/A	N/A	N/A
BAL-002-0	R4.2.	The default Disturbance Recovery Period is 15 minutes after the start of a Reportable Disturbance. This period may be adjusted to better suit the needs of an Interconnection based on analysis approved by the NERC Operating Committee.	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (BAL)

Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
BAL-002-0	R5.1.	The Reserve Sharing Group reviews group ACE (or equivalent) and demonstrates compliance to the DCS. To be in compliance, the group ACE (or its equivalent) must meet the Disturbance Recovery Criterion after the schedule change(s) related to reserve sharing have been fully implemented, and within the Disturbance Recovery Period.	N/A	N/A	N/A	N/A
BAL-002-0	R5.2.	The Reserve Sharing Group reviews each member's ACE in response to the activation of reserves. To be in compliance, a member's ACE (or its equivalent) must meet the Disturbance Recovery Criterion after the schedule change(s) related to reserve sharing have	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (BAL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		been fully implemented, and within the Disturbance Recovery Period.				
BAL-002-0	R6.	A Balancing Authority or Reserve Sharing Group shall fully restore its Contingency Reserves within the Contingency Reserve Restoration Period for its Interconnection.	The Balancing Authority or Reserve Sharing Group failed to restore 5% or less of its contingency reserves during the Contingency Reserve Restoration Period.	The Balancing Authority or Reserve Sharing Group failed to restore more than 5% up to (and including) 10% of its contingency reserves during the Contingency Reserve Restoration Period.	The Balancing Authority or Reserve Sharing Group failed to restore more than 10% up to (and including) 15% of its Contingency Reserve during the Contingency Reserve Restoration Period.	The Balancing Authority or Reserve Sharing Group failed to restore more than 15% of its Contingency Reserves during the Contingency Reserve Restoration Period.
BAL-002-0	R6.1.	The Contingency Reserve Restoration Period begins at the end of the Disturbance Recovery Period.	N/A	N/A	N/A	N/A
BAL-002-0	R6.2.	The default Contingency Reserve Restoration Period is 90 minutes. This period may be adjusted to better suit the reliability targets of the Interconnection based on analysis approved by the NERC Operating Committee.	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (BAL)

Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
BAL-003-0.1b	R1.	Each Balancing Authority shall review its Frequency Bias Settings by January 1 of each year and recalculate its setting to reflect any change in the Frequency Response of the Balancing Authority Area.	The Balancing Authority failed to report the method for determining its Frequency Bias Setting to the NERC Operating Committee.	The Balancing Authority failed to report its Frequency Bias Setting to the NERC Operating Committee.	The Balancing Authority failed to report its Frequency Bias Settings and the method for determining that Frequency Bias Setting and the method for determining that Frequency Bias Setting to the NERC operating Committee as required in R1.2.	The Balancing Authority failed to review its Frequency Bias Settings by January 1 of each year and recalculate its setting to reflect any change in the Frequency Response of the Balancing Authority Area.
BAL-003-0.1b	R1.1.	The Balancing Authority may change its Frequency Bias Setting, and the method used to determine the setting, whenever any of the factors used to determine the current bias value change.	N/A	N/A	N/A	N/A
BAL-003-0.1b	R1.2.	Each Balancing Authority shall report its Frequency Bias Setting, and method for determining that setting, to the NERC Operating Committee.	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (BAL)

Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
BAL-003-0.1b	R3.	Each Balancing Authority shall operate its Automatic Generation Control (AGC) on Tie Line Frequency Bias, unless such operation is adverse to system or Interconnection reliability.	N/A	N/A	N/A	The Balancing Authority did not operate its Automatic Generation Control (AGC) on Tie Line Frequency Bias, during periods when such operation would not have been adverse to system or Interconnection reliability.
BAL-003-0.1b	R4.	Balancing Authorities that use Dynamic Scheduling or Pseudo-ties for jointly owned units shall reflect their respective share of the unit governor droop response in their respective Frequency Bias Setting.	N/A	N/A	N/A	The Balancing Authority that used Dynamic Scheduling or Pseudo-ties for jointly owned units did not reflect its respective share of the unit governor droop response in its respective Frequency Bias Setting.
BAL-003-0.1b	R4.1.	Fixed schedules for Jointly Owned Units mandate that Balancing Authority (A) that contains the Jointly Owned Unit must incorporate the respective share of the unit governor droop response for any Balancing	N/A	N/A	N/A	The Balancing Authority (A) that contained the Jointly Owned Unit with fixed schedules did not incorporate the respective share of the unit governor droop response for any Balancing Authorities that have

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Authorities that have fixed schedules (B and C). See the diagram below.				fixed schedules (B and C).
BAL-003-0.1b	R4.2.	The Balancing Authorities that have a fixed schedule (B and C) but do not contain the Jointly Owned Unit shall not include their share of the governor droop response in their Frequency Bias Setting. ***See Standard for Graphic***	N/A	N/A	N/A	A Balancing Authority that has a fixed schedule (B and C) but does not contain the Jointly Owned Unit included its share of the governor droop response in its Frequency Bias Setting.
BAL-003-0.1b	R5.	Balancing Authorities that serve native load shall have a monthly average Frequency Bias Setting that is at least 1% of the Balancing Authority's estimated yearly peak demand per 0.1 Hz change.	N/A	N/A	N/A	The Balancing Authority that served native load failed to have a monthly average Frequency Bias Setting that was at least 1% of the entities estimated yearly peak demand per 0.1 Hz change.
BAL-003-0.1b	R5.1.	Balancing Authorities that do not serve native load shall have a monthly	N/A	N/A	N/A	The Balancing Authority that does not serve native load did not have a

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		average Frequency Bias Setting that is at least 1% of its estimated maximum generation level in the coming year per 0.1 Hz change.				monthly average Frequency Bias Setting that was at least 1% of its estimated maximum generation level in the coming year per 0.1 Hz change.
BAL-004-0	R2.	The Interconnection Time Monitor shall monitor Time Error and shall initiate or terminate corrective action orders in accordance with the NAESB Time Error Correction Procedure.	N/A	N/A	N/A	The responsible entity serving as the Interconnection Time Monitor failed to initiate or terminate corrective action orders in accordance with the NAESB Time Error Correction Procedure.
BAL-004-0	R4.1.	Balancing Authorities that have reliability concerns with the execution of a Time Error Correction shall notify their Reliability Coordinator and request the termination of a Time Error Correction in progress.	N/A	N/A	N/A	The Balancing Authority with reliability concerns failed to notify the Reliability Coordinator and request the termination of a Time Error Correction in progress.
BAL-005-0.1b	R1.	All generation, transmission, and load operating	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (BAL)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		within an Interconnection must be included within the metered boundaries of a Balancing Authority Area.				
BAL-005-0.1b	R2.	Each Balancing Authority shall maintain Regulating Reserve that can be controlled by AGC to meet the Control Performance Standard.	N/A	N/A	N/A	The Balancing Authority failed to maintain Regulating Reserve that can be controlled by AGC to meet Control Performance Standard.
BAL-005-0.1b	R5.	A Balancing Authority receiving Regulation Service shall ensure that backup plans are in place to provide replacement Regulation Service should the supplying Balancing Authority no longer be able to provide this service.	N/A	N/A	N/A	The Balancing Authority receiving Regulation Service failed to ensure that back-up plans were in place to provide replacement Regulation Service.
BAL-005-0.1b	R7.	The Balancing Authority shall operate AGC continuously unless such operation adversely impacts the reliability of the Interconnection. If AGC has become	N/A	N/A	N/A	The Balancing Authority failed to operate AGC continuously when there were no adverse impacts. OR If its AGC was

Violation Severity Level Matrix (BAL)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		inoperative, the Balancing Authority shall use manual control to adjust generation to maintain the Net Scheduled Interchange.				inoperative the Balancing Authority failed to use manual control to adjust generation to maintain the Net Scheduled Interchange.
BAL-005-0.1b	R9.	The Balancing Authority shall include all Interchange Schedules with Adjacent Balancing Authorities in the calculation of Net Scheduled Interchange for the ACE equation.	N/A	N/A	N/A	The Balancing Authority failed to include all Interchange Schedules with Adjacent Balancing Authorities in the calculation of Net Scheduled Interchange for the ACE equation.
BAL-005-0.1b	R9.1.	Balancing Authorities with a high voltage direct current (HVDC) link to another Balancing Authority connected asynchronously to their Interconnection may choose to omit the Interchange Schedule related to the HVDC link from the ACE equation if it is modeled as internal generation or load.	N/A	N/A	N/A	The Balancing Authority with a high voltage direct current (HVDC) link to another Balancing Authority connected asynchronously to its Interconnection chose to omit the Interchange Schedule related to the HVDC link from the ACE equation, but failed to model it as internal generation or load.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
BAL-005-0.1b	R10.	The Balancing Authority shall include all Dynamic Schedules in the calculation of Net Scheduled Interchange for the ACE equation.	N/A	N/A	N/A	The Balancing Authority failed to include all Dynamic Schedules in the calculation of Net Scheduled Interchange for the ACE equation.
BAL-005-0.1b	R12.1.	Balancing Authorities that share a tie shall ensure Tie Line MW metering is telemetered to both control centers, and emanates from a common, agreed-upon source using common primary metering equipment. Balancing Authorities shall ensure that megawatt-hour data is telemetered or reported at the end of each hour.	The Balancing Authority failed to ensure 5% or less of all its Tie Line MW metering was telemetered to both control centers and emanates from a common, agreed-upon source OR The Balancing Authority failed to ensure that megawatt-hour data was telemetered or reported for 5% or less of the hours.	The Balancing Authority failed to ensure more than 5% up to (and including) 10% of all its Tie Line MW metering was telemetered to both control centers and emanates from a common, agreed-upon source. OR The Balancing Authority failed to ensure that megawatt-hour data was telemetered or reported for more than 5% up to (and including) 10% of the hours.	The Balancing Authority failed to ensure more than 10% up to (and including) 15% of all its Tie Line MW metering was telemetered to both control centers and emanates from a common, agreed-upon source. OR The Balancing Authority failed to ensure that megawatt-hour data was telemetered or reported for more than 10% up to (and including) 15% of the hours.	The Balancing Authority failed to ensure more than 15% of all its Tie Line MW metering was telemetered to both control centers and emanates from a common, agreed-upon source. OR The Balancing Authority failed to ensure that megawatt-hour data was telemetered or reported for more than 15% of the hours.
BAL-005-0.1b	R12.2.	Balancing Authorities shall ensure the power flow and ACE signals that are	The responsible entity did not ensure that 5% or less of the power flow and ACE signals are not	The responsible entity did not ensure that more than 5% up to (and including) 10% of the power	The responsible entity did not ensure that more than 10% up to (and including) 15% of the power	The responsible entity did not ensure that more than 15% of the power flow and ACE signals are

Violation Severity Level Matrix (BAL)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		utilized for calculating Balancing Authority performance or that are transmitted for Regulation Service are not filtered prior to transmission, except for the Anti-aliasing Filters of Tie Lines.	filtered except for Anti-aliasing filtering.	flow and ACE signals are not filtered except for Anti-aliasing filtering.	flow and ACE signals are not filtered except for Anti-aliasing filtering.	not filtered except for Anti-aliasing filtering.
BAL-005-0.1b	R12.3.	Balancing Authorities shall install common metering equipment where Dynamic Schedules or Pseudo-Ties are implemented between two or more Balancing Authorities to deliver the output of Jointly Owned Units or to serve remote load.	N/A	N/A	N/A	The applicable entity did not install common metering equipment where Dynamic Schedules or Pseudo-Ties are implemented.
BAL-005-0.1b	R15.	The Balancing Authority shall provide adequate and reliable backup power supplies and shall periodically test these supplies at the Balancing Authority's control center and other	N/A	N/A	The Balancing Authority failed to periodically test backup power supplies at the Balancing Authority's control center and other critical locations to ensure continuous	The Balancing Authority failed to provide adequate and reliable backup power supplies to ensure continuous operation of AGC and vital data recording equipment during loss of the

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		critical locations to ensure continuous operation of AGC and vital data recording equipment during loss of the normal power supply.			operation of AGC and vital data recording equipment during loss of the normal power supply.	normal power supply.
BAL-005-0.1b	R16.	The Balancing Authority shall sample data at least at the same periodicity with which ACE is calculated. The Balancing Authority shall flag missing or bad data for operator display and archival purposes. The Balancing Authority shall collect coincident data to the greatest practical extent, i.e., ACE, Interconnection frequency, Net Actual Interchange, and other data shall all be sampled at the same time.	The Balancing Authority failed to collect coincident data to the greatest practical extent.	N/A	The Balancing Authority failed to flag missing or bad data for operator display and archival purposes.	The Balancing Authority failed to sample data at least at the same periodicity with which ACE is calculated.
BAL-005-0.1b	R17.	Each Balancing Authority shall at least annually check and calibrate its time error and frequency	N/A	N/A	N/A	The Balancing Authority failed to at least annually check and calibrate its time error and frequency

Violation Severity Level Matrix (BAL)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		devices against a common reference. The Balancing Authority shall adhere to the minimum values for measuring devices as listed below: ***See Standard for Values***				devices against a common reference.
BAL-006-1.1	R1.	Each Balancing Authority shall calculate and record hourly Inadvertent Interchange.	The Balancing Authority failed to calculate and record hourly Inadvertent Interchange for 5% or less of the hours.	The Balancing Authority failed to calculate and record hourly Inadvertent Interchange for more than 5% up to (and including) 10% of the hours.	The Balancing Authority failed to calculate and record hourly Inadvertent Interchange for more than 10% up to (and including) 15% of the hours.	The Balancing Authority failed to calculate and record hourly Inadvertent Interchange for greater than 15% of the hours.
BAL-006-1.1	R3.	Each Balancing Authority shall ensure all of its Balancing Authority Area interconnection points are equipped with common megawatt-hour meters, with readings provided hourly to the control centers of Adjacent Balancing Authorities.	The Balancing Authority failed to ensure that 5% or less of its Balancing Authority Area interconnection points are equipped with common megawatt-hour meters, with readings provided hourly to the control centers of Adjacent Balancing Authorities.	The Balancing Authority failed to ensure that more than 5% up to (and including) 10% of its Balancing Authority Area interconnection points are equipped with common megawatt-hour meters, with readings provided hourly to the control centers of Adjacent Balancing Authorities.	The Balancing Authority failed to ensure that more than 10% up to (and including) 15% of its Balancing Authority Area interconnection points are equipped with common megawatt-hour meters, with readings provided hourly to the control centers of Adjacent Balancing Authorities.	The Balancing Authority failed to ensure that more than 15% of its Balancing Authority Area interconnection points are equipped with common megawatt-hour meters, with readings provided hourly to the control centers of Adjacent Balancing Authorities.

Violation Severity Level Matrix (CIP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
CIP-001-1	R1.	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi site sabotage affecting larger portions of the Interconnection.	N/A	N/A	The responsible entity has procedures for the recognition of sabotage events on its facilities and multi site sabotage affecting larger portions of the Interconnection but does not have a procedure for making their operating personnel aware of said events.	The responsible entity failed to have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi site sabotage affecting larger portions of the Interconnection.
CIP-001-1	R2.	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.	N/A	N/A	The responsible entity has demonstrated the existence of a procedure to communicate information concerning sabotage events, but not all of the appropriate parties in the interconnection are identified.	The responsible entity failed to have a procedure for communicating information concerning sabotage events.

Violation Severity Level Matrix (CIP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
CIP-001-1	R3.	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.	N/A	The responsible entity provided its operating personnel with a sabotage response guideline, but failed to include the personnel to contact for reporting disturbances due to sabotage events.	N/A	The responsible entity failed to provide its operating personnel with a sabotage response guideline.
CIP-001-1	R4.	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and develop reporting procedures as appropriate to their circumstances.	N/A	N/A	The responsible entity has established communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials, but has not developed a reporting procedure.	The responsible entity failed to establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials, and has not developed a reporting procedure.

Violation Severity Level Matrix (COM)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
COM-001-1.1	R1.	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide adequate and reliable telecommunications facilities for the exchange of Interconnection and operating information:	N/A	The responsible entity failed to provide adequate and reliable telecommunications facilities for the exchange of Interconnection and operating information to one of the groups specified in R1.1, or R1.2, or R1.3	The responsible entity failed to provide adequate and reliable telecommunications facilities for the exchange of Interconnection or operating information to two of the groups specified in R1.1, or R1.2, or R1.3.	The responsible entity failed to provide adequate and reliable telecommunications facilities for the exchange of Interconnection and operating information to all 3 of the groups specified in R1.1, or R1.2, or R1.3. OR The responsible entity's telecommunications is not redundant or diversely routed as applicable as specified in R1.4
COM-001-1.1	R1.1.	Internally.	N/A	N/A	N/A	N/A
COM-001-1.1	R1.2.	Between the Reliability Coordinator and its Transmission Operators and Balancing Authorities.	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (COM)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
COM-001-1.1	R1.3.	With other Reliability Coordinators, Transmission Operators, and Balancing Authorities as necessary to maintain reliability.	N/A	N/A	N/A	N/A
COM-001-1.1	R1.4.	Where applicable, these facilities shall be redundant and diversely routed.	N/A	N/A	N/A	N/A
COM-001-1.1	R2.	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall manage, alarm, test and/or actively monitor vital telecommunications facilities. Special attention shall be given to emergency telecommunications facilities and equipment not used for routine communications.	N/A	The responsible entity has failed to manage, alarm, and test or actively monitor its emergency telecommunications facilities.	The responsible entity has failed to manage, alarm, and test or actively monitor its vital telecommunications facilities.	The responsible entity has failed to manage, alarm, and test or actively monitor its vital and emergency telecommunications facilities.
COM-001-1.1	R4.	Unless agreed to otherwise, each Reliability Coordinator,	N/A	N/A	N/A	The responsible entity used a language other than English and failed to

Violation Severity Level Matrix (COM)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Transmission Operator, and Balancing Authority shall use English as the language for all communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected Bulk Electric System. Transmission Operators and Balancing Authorities may use an alternate language for internal operations.				have an agreement to do so.
COM-001-1.1	R5.	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall have written operating instructions and procedures to enable continued operation of the system during the loss of telecommunications facilities.	N/A	N/A	N/A	The responsible entity did not have written operating instructions and procedures to enable continued operation of the system during the loss of telecommunications facilities.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
COM-001-1.1	R6.	Each NERCNet User Organization shall adhere to the requirements in Attachment 1-COM-001, “NERCNet Security Policy.”	The NERCNet User Organization failed to adhere to 5% or less of the requirements listed in Attachment 1-COM-001, , "NERCNet Security Policy".	The NERCNet User Organization failed to adhere to more than 5% up to (and including) 10% of the requirements listed in Attachment 1 - COM-001, "NERCNet Security Policy".	The NERCNet User Organization failed to adhere to more than 10% up to (and including) 15% of the requirements listed in Attachment 1-COM-001 "NERCNet Security Policy".	The NERCNet User Organization failed to more than 15% of the requirements listed in Attachment 1-COM-001, "NERCNet Security Policy".
COM-002-2	R1.	Each Transmission Operator, Balancing Authority, and Generator Operator shall have communications (voice and data links) with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators. Such communications shall be staffed and available for addressing a real-time emergency condition.	N/A	The responsible entity did not have data links with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators. OR The responsible entity did not have voice links with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators.	N/A	The responsible entity failed to have communications (voice and data links) with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators. OR The responsible entity's communications were not staffed and available for addressing real time emergency conditions.
COM-002-2	R1.1.	Each Balancing Authority and Transmission	N/A	N/A	The responsible entity failed to notify all other potentially	The responsible entity failed to notify its Reliability

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Operator shall notify its Reliability Coordinator, and all other potentially affected Balancing Authorities and Transmission Operators through predetermined communication paths of any condition that could threaten the reliability of its area or when firm load shedding is anticipated.			affected Balancing Authorities and Transmission Operators through predetermined communication paths of any condition that could threaten the reliability of its area or when firm load shedding was anticipated.	Coordinator, and all other potentially affected Balancing Authorities and Transmission Operators through predetermined communication paths of any condition that could threaten the reliability of its area or when firm load shedding was anticipated.
COM-002-2	R2.	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall issue directives in a clear, concise, and definitive manner; shall ensure the recipient of the directive repeats the information back correctly; and shall acknowledge the response as correct or repeat the original statement to resolve any	N/A	The responsible entity provided a clear directive in a clear, concise and definitive manner and required the recipient to repeat the directive, but did not acknowledge the recipient was correct in the repeated directive.	The responsible entity provided a clear directive in a clear, concise and definitive manner, but did not require the recipient to repeat the directive.	The responsible entity failed to provide a clear directive in a clear, concise and definitive manner when required.

Violation Severity Level Matrix (COM)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		misunderstandings.				

Violation Severity Level Matrix (EOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
EOP-001-0	R1.	Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.	N/A	The Balancing Authority demonstrated the existence of an operating agreement with at least one adjacent Balancing Authority for emergency assistance, but the agreement did not include provision for obtaining emergency assistance from any remote Balancing Authority.	N/A	The Balancing Authority did not demonstrate the existence of any operating agreements with adjacent Balancing Authorities that include provision for emergency assistance with adjacent Balancing Authorities.
EOP-001-0	R2.	The Transmission Operator shall have an emergency load reduction plan for all identified IROLs. The plan shall include the details on how the Transmission Operator will implement load reduction in sufficient amount and time to mitigate the IROL violation before system separation or collapse would	N/A	N/A	The Transmission Operator demonstrated the existence of an emergency load reduction plan for each identified IROL but at least one of the plans will take longer than 30 minutes to implement.	The Transmission Operator failed to demonstrate the existence of an emergency load reduction plan for all identified IROLs.

Violation Severity Level Matrix (EOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		occur. The load reduction plan must be capable of being implemented within 30 minutes.				
EOP-001-0	R3.	Each Transmission Operator and Balancing Authority shall:	N/A	N/A	N/A	N/A
EOP-001-0	R3.1.	Develop, maintain, and implement a set of plans to mitigate operating emergencies for insufficient generating capacity.	N/A	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity but the plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity.
EOP-001-0	R3.2.	Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.	N/A	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies on the transmission system and the plans are implemented but the	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans to mitigate operating emergencies on the transmission system but the plans are neither maintained	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans to mitigate operating emergencies on the transmission system.

Violation Severity Level Matrix (EOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				plans are not maintained.	nor implemented.	
EOP-001-0	R3.3.	Develop, maintain, and implement a set of plans for load shedding.	N/A	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for load shedding and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for load shedding but the plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans for load shedding.
EOP-001-0	R3.4.	Develop, maintain, and implement a set of plans for system restoration.	N/A	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for system restoration and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing Authority demonstrated the existence of a set of plans for system restoration but the plans are neither maintained nor implemented.	The Transmission Operator or Balancing Authority failed to demonstrate the existence of a set of plans for system restoration.
EOP-001-0	R4.	Each Transmission Operator and Balancing Authority shall have emergency plans that will enable it to mitigate operating emergencies. At a minimum, Transmission	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans do not include	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans do not include	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans do not include	The Transmission Operator or Balancing Authority demonstrated the existence of emergency plans that will enable it to mitigate operating emergencies but the plans are missing

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Operator and Balancing Authority emergency plans shall include:	sub-requirement R4.4.	sub-requirement R4.3.	either sub-requirement R4.1 or R4.2.	two (2) or more of the sub-requirements identified for R4.
EOP-001-0	R4.1.	Communications protocols to be used during emergencies.	N/A	N/A	N/A	N/A
EOP-001-0	R4.2.	A list of controlling actions to resolve the emergency. Load reduction, in sufficient quantity to resolve the emergency within NERC-established timelines, shall be one of the controlling actions.	N/A	N/A	N/A	N/A
EOP-001-0	R4.3.	The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.	N/A	N/A	N/A	N/A
EOP-001-0	R4.4.	Staffing levels for the emergency.	N/A	N/A	N/A	N/A
EOP-001-0	R6.	The Transmission Operator and Balancing Authority shall annually review and update each emergency	N/A	N/A	N/A	The Transmission Operator or Balancing Authority failed to provide evidence that it completed an annual

Violation Severity Level Matrix (EOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		plan. The Transmission Operator and Balancing Authority shall provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.				review, and updated each of its emergency plans appropriately. OR The Transmission Operator or Balancing Authority failed to provide a copy of one of its updated emergency plans to its Reliability Coordinator, all its neighboring Transmission Operators, and all its neighboring Balancing Authorities.
EOP-001-0	R7.	The Transmission Operator and Balancing Authority shall coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate. This coordination includes the following steps, as	The Transmission Operator or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in R7.4	The Transmission Operator or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in R7.3	The Transmission Operator or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in either	The Transmission Operator or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in two (2)

Violation Severity Level Matrix (EOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		applicable:	was applicable and was not included.	was applicable and was not included.	R7.1 or R7.2 was applicable and was not included. .	or more of the sub-requirements was applicable and was not included.
EOP-001-0	R7.1.	The Transmission Operator and Balancing Authority shall establish and maintain reliable communications between interconnected systems.	N/A	N/A	N/A	N/A
EOP-001-0	R7.2.	The Transmission Operator and Balancing Authority shall arrange new interchange agreements to provide for emergency capacity or energy transfers if existing agreements cannot be used.	N/A	N/A	N/A	N/A
EOP-001-0	R7.3.	The Transmission Operator and Balancing Authority shall coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (EOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		in short supply. (This includes water for hydro generators.)				
EOP-001-0	R7.4.	The Transmission Operator and Balancing Authority shall arrange deliveries of electrical energy or fuel from remote systems through normal operating channels.	N/A	N/A	N/A	N/A
EOP-002-2.1	R1.	Each Balancing Authority and Reliability Coordinator shall have the responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its respective area and shall exercise specific authority to alleviate capacity and energy emergencies.	N/A	N/A	The Balancing Authority or Reliability Coordinator failed to provide evidence that it has responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its respective area.	The responsible entity failed to exercise its authority to alleviate a capacity or energy emergency.
EOP-002-2.1	R2.	Each Balancing Authority shall implement its	N/A	N/A	N/A	The Balancing Authority failed to implement its

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		capacity and energy emergency plan, when required and as appropriate, to reduce risks to the interconnected system.				capacity and energy emergency plan, when required and as appropriate, to reduce risks to the interconnected system.
EOP-002-2.1	R3.	A Balancing Authority that is experiencing an operating capacity or energy emergency shall communicate its current and future system conditions to its Reliability Coordinator and neighboring Balancing Authorities.	N/A	N/A	N/A	The Balancing Authority experienced an operating capacity or energy emergency and failed to communicate its current and future system conditions to its Reliability Coordinator and its neighboring Balancing Authorities.
EOP-002-2.1	R4.	A Balancing Authority anticipating an operating capacity or energy emergency shall perform all actions necessary including bringing on all available generation, postponing equipment maintenance,	N/A	N/A	N/A	The Balancing Authority anticipating an operating capacity or energy emergency failed to perform all actions necessary including bringing on all available generation, postponing equipment maintenance,

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		scheduling interchange purchases in advance, and being prepared to reduce firm load.				scheduling interchange purchases in advance, or preparing to reduce firm load.
EOP-002-2.1	R5.	A deficient Balancing Authority shall only use the assistance provided by the Interconnection's frequency bias for the time needed to implement corrective actions. The Balancing Authority shall not unilaterally adjust generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes. Such unilateral adjustment may overload transmission facilities.	N/A	N/A	The Balancing Authority used the assistance provided by the Interconnection's frequency bias for more time than needed to implement corrective actions. OR The Balancing Authority unilaterally adjusted generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.	The Balancing Authority used the assistance provided by the Interconnection's frequency bias for more time than needed to implement corrective actions AND The Balancing Authority unilaterally adjusted generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.
EOP-002-2.1	R6.	If the Balancing	N/A	N/A	The Balancing	The Balancing

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Authority cannot comply with the Control Performance and Disturbance Control Standards, then it shall immediately implement remedies to do so. These remedies include, but are not limited to:			Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to immediately implement one (1) of the sub-requirements R6.1, R6.2, R6.3, R6.4, R6.5 or R6.6.	Authority was not able to comply with the Control Performance and Disturbance Control Standards and failed to immediately implement more than one (1) of the sub-requirements R6.1, R6.2, R6.3, R6.4, R6.5 or R6.6. OR The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and did not immediately implement any remedies.
EOP-002-2.1	R6.1.	Loading all available generating capacity.	N/A	N/A	N/A	N/A
EOP-002-2.1	R6.2.	Deploying all available operating reserve	N/A	N/A	N/A	N/A
EOP-002-2.1	R6.3.	Interrupting interruptible load and exports.	N/A	N/A	N/A	N/A
EOP-002-2.1	R6.4.	Requesting emergency	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		assistance from other Balancing Authorities.				
EOP-002-2.1	R6.5.	Declaring an Energy Emergency through its Reliability Coordinator; and	N/A	N/A	N/A	N/A
EOP-002-2.1	R6.6.	Reducing load, through procedures such as public appeals, voltage reductions, curtailing interruptible loads and firm loads.	N/A	N/A	N/A	N/A
EOP-002-2.1	R7.	Once the Balancing Authority has exhausted the steps listed in Requirement 6, or if these steps cannot be completed in sufficient time to resolve the emergency condition, the Balancing Authority shall:	N/A	N/A	The Balancing Authority exhausted the steps listed in R6 or the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirement R7.1. OR The Balancing Authority exhausted the steps listed in R6 or the steps listed in R6 could not be	The Balancing Authority exhausted the steps listed in R6 or the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirement R7.1. AND The Balancing Authority exhausted the steps listed in R6 or the steps listed in R6 could not be

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirement R7.2.	completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirement R7.2.
EOP-002-2.1	R7.1.	Manually shed firm load without delay to return its ACE to zero; and	N/A	N/A	N/A	N/A
EOP-002-2.1	R7.2.	Request the Reliability Coordinator to declare an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0 “Energy Emergency Alert Levels.”	N/A	N/A	N/A	N/A
EOP-002-2.1	R8.	A Reliability Coordinator that has any Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency shall initiate an Energy Emergency Alert as detailed in	N/A	A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert	A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert	A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing an actual Energy Emergency and the Reliability Coordinator did not act to mitigate the emergency condition

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Attachment 1-EOP-002-0 "Energy Emergency Alert Levels." The Reliability Coordinator shall act to mitigate the emergency condition, including a request for emergency assistance if required.		**Level 1** as detailed in Attachment 1-EOP-002-0 "Energy Emergency Alert Levels."	**Level 2** or 3 as detailed in Attachment 1-EOP-002-0 "Energy Emergency Alert Levels."	by requesting emergency assistance when this was required.
EOP-002-2.1	R9.	When a Transmission Service Provider expects to elevate the transmission service priority of an Interchange Transaction from Priority 6 (Network Integration Transmission Service from Non-designated Resources) to Priority 7 (Network Integration Transmission Service from designated Network Resources) as permitted in its transmission tariff	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		(See Attachment 1-IRO-006-0 "Transmission Loading Relief Procedure" for explanation of Transmission Service Priorities):				
EOP-002-2.1	R9.1.	The deficient Load-Serving Entity shall request its Reliability Coordinator to initiate an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0.	N/A	N/A	N/A	For an expected elevation in transmission service priority from Priority 6 to Priority 7, the deficient Load-Serving Entity failed to request its Reliability Coordinator initiate an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0.
EOP-002-2.1	R9.2.	The Reliability Coordinator shall submit the report to NERC for posting on the NERC Website, noting the expected total MW that may have its transmission service priority changed.	N/A	N/A	N/A	The Reliability Coordinator failed to submit the report to NERC for posting on the NERC Website, noting the expected total MW that may have its transmission service priority changed.
EOP-002-2.1	R9.3.	The Reliability	N/A	N/A	N/A	The Reliability

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Coordinator shall use EEA 1 to forecast the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.				Coordinator failed to use EEA 1 to forecast the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.
EOP-002-2.1	R9.4.	The Reliability Coordinator shall use EEA 2 to announce the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.	N/A	N/A	N/A	The Reliability Coordinator failed to use EEA 2 to announce the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.
EOP-003-1	R1.	After taking all other remedial steps, a Transmission Operator or Balancing Authority operating with insufficient generation or transmission capacity shall shed customer load rather than risk an uncontrolled failure of components or cascading outages of	N/A	N/A	N/A	The Transmission Operator or Balancing Authority failed to shed customer load.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		the Interconnection.				
EOP-003-1	R2.	Each Transmission Operator and Balancing Authority shall establish plans for automatic load shedding for underfrequency or undervoltage conditions.	N/A	N/A	N/A	The responsible entity did not establish plans for automatic load shedding as directed by the requirement.
EOP-003-1	R3.	Each Transmission Operator and Balancing Authority shall coordinate load shedding plans among other interconnected Transmission Operators and Balancing Authorities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting 5% or less of its required entities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting more than 5% up to (and including) 10% of its required entities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting more than 10%, up to (and including) 15% or less, of its required entities.	The responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting more than 15% of its required entities.
EOP-003-1	R5.	A Transmission Operator or Balancing Authority shall implement load shedding in steps established to minimize the risk of further uncontrolled separation, loss of generation, or system shutdown.	N/A	N/A	N/A	The Transmission Operator or Balancing Authority failed to implement load shedding in steps established to minimize the risk of further uncontrolled separation, loss of generation, or system shutdown.
EOP-003-1	R6.	After a Transmission	N/A	N/A	N/A	The Transmission

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Operator or Balancing Authority Area separates from the Interconnection, if there is insufficient generating capacity to restore system frequency following automatic underfrequency load shedding, the Transmission Operator or Balancing Authority shall shed additional load.				Operator or Balancing Authority failed to shed additional load after it had separated from the Interconnection when there was insufficient generating capacity to restore system frequency following automatic underfrequency load shedding.
EOP-003-1	R8.	Each Transmission Operator or Balancing Authority shall have plans for operator-controlled manual load shedding to respond to real-time emergencies. The Transmission Operator or Balancing Authority shall be capable of implementing the load shedding in a timeframe adequate for responding to the emergency.	N/A	The responsible entity did not have plans for operator controlled manual load shedding, as directed by the requirement.	The responsible entity has plans for manual load shedding but did not have the capability to implement the load shedding, as directed by the requirement.	The responsible entity did not have plans for operator controlled manual load shedding, as directed by the requirement nor had the capability to implement the load shedding, as directed by the requirement.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
EOP-004-1	R2.	A Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity shall promptly analyze Bulk Electric System disturbances on its system or facilities.	The responsible entity failed to promptly analyze 5% or less of its disturbances on the BES.	The responsible entity failed to promptly analyze more than 5% up to (and including) 10% of its disturbances on the BES.	The responsible entity failed to promptly analyze more than 10% up to (and including) 15% of its disturbances on the BES.	The responsible entity failed to promptly analyze more than 15% of its disturbances on the BES.
EOP-004-1	R3.1.	The affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity shall submit within 24 hours of the disturbance or unusual occurrence either a copy of the report submitted to DOE, or, if no DOE report is required, a copy of the NERC Interconnection Reliability Operating Limit and Preliminary Disturbance Report form. Events that are not identified	The responsible entity submitted the report as required in R3.1 more than 24 but less than or equal to 36 hours after the disturbance or unusual occurrence, or discovery of the disturbance or unusual occurrence.	The responsible entity submitted the report as required in R3.1 more than 36 hours but less than or equal to 48 hours after the disturbance or unusual occurrence, or discovery of the disturbance or unusual occurrence.	The responsible entities submitted the report as required in R3.1 more than 48 hours but less than or equal to 72 hours after the disturbance or unusual occurrence, or discovery of the disturbance or unusual occurrence.	The responsible entities submitted the report as required in R3.1 more than 72-hours after the disturbance or unusual occurrence or discovery of the disturbance or unusual occurrence.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		until some time after they occur shall be reported within 24 hours of being recognized.				
EOP-004-1	R3.2.	Applicable reporting forms are provided in Attachments 1-EOP-004 and 2-EOP-004.	N/A	N/A	N/A	N/A
EOP-004-1	R3.3.	Under certain adverse conditions, e.g., severe weather, it may not be possible to assess the damage caused by a disturbance and issue a written Interconnection Reliability Operating Limit and Preliminary Disturbance Report within 24 hours. In such cases, the affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load-Serving Entity shall promptly notify its Regional Reliability	N/A	N/A	N/A	The responsible entity did not provide its Regional Reliability Organization(s) and NERC with verbal notification or updates about a disturbance as specified in R3.3.

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Organization(s) and NERC, and verbally provide as much information as is available at that time. The affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load-Serving Entity shall then provide timely, periodic verbal updates until adequate information is available to issue a written Preliminary Disturbance Report.				
EOP-004-1	R3.4.	If, in the judgment of the Regional Reliability Organization, after consultation with the Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load-Serving Entity in which a disturbance occurred, a final	The responsible entity submitted the final report no more than 30 days past the 60 day due date; or the final report was missing one of the three elements specified in R3.4.	The responsible entity submitted the final report between 31 days and 60 days inclusive past the 60 day due date. OR The final report was missing two of the three elements specified in R3.4.	The responsible entity submitted the final report between 61 days and 90 days inclusive past the 60 day due date	The responsible entity failed to submit the final report. OR The responsible entity submitted the final report 91 days or more past the 60 day due date OR The responsible entity submitted a

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		report is required, the affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load-Serving Entity shall prepare this report within 60 days. As a minimum, the final report shall have a discussion of the events and its cause, the conclusions reached, and recommendations to prevent recurrence of this type of event. The report shall be subject to Regional Reliability Organization approval.				final report that was missing all three of the elements specified in R3.4.
EOP-005-1	R2.	Each Transmission Operator shall review and update its restoration plan at least annually and whenever it makes changes in the power system network, and shall correct deficiencies found	The Transmission Operator failed to review or update its restoration plan when it made changes in the power system network.	The Transmission Operator failed to review and update its restoration plan at least annually.	The Transmission Operator failed to review and update its restoration plan at least annually or whenever it made changes in the power system network, and failed to correct deficiencies found	The Transmission Operator failed to review and update its restoration plan at least annually and whenever it made changes in the power system network, and failed to correct deficiencies found

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		during the simulated restoration exercises.			during the simulated restoration exercises.	during the simulated restoration exercises.
EOP-005-1	R3.	Each Transmission Operator shall develop restoration plans with a priority of restoring the integrity of the Interconnection.	N/A	N/A	N/A	The Transmission Operator's restoration plans failed to make restoration of the integrity of the Interconnection a priority.
EOP-005-1	R4.	Each Transmission Operator shall coordinate its restoration plans with the Generator Owners and Balancing Authorities within its area, its Reliability Coordinator, and neighboring Transmission Operators and Balancing Authorities.	The Transmission Operator failed to coordinate its restoration plans with 5% or less of the entities identified in the requirement.	The Transmission Operator failed to coordinate its restoration plans with more than 5% up to (and including) 10% of the entities identified in the requirement.	The Transmission Operator failed to coordinate its restoration plans with more than 10% up to (and including) 15% of the entities identified in the requirement.	The Transmission Operator failed to coordinate its restoration plans with more than 15% of the entities identified in the requirement.
EOP-005-1	R6.	Each Transmission Operator and Balancing Authority shall train its operating personnel in the implementation of the restoration plan. Such training shall	The Transmission Operator or Balancing Authority failed to train 5% or less of its operating personnel in the implementation of the restoration plan.	The Transmission Operator or Balancing Authority failed to train more than 5% up to (and including) 10 % of its operating personnel in the implementation of	The Transmission Operator or Balancing Authority failed to train more than 10 % up to (and including) 15% of its operating personnel in the implementation of	The Transmission Operator or Balancing Authority failed to train more than 15% of its operating personnel in the implementation of the restoration plan.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		include simulated exercises, if practicable.		the restoration plan.	the restoration plan.	
EOP-005-1	R7.	Each Transmission Operator and Balancing Authority shall verify the restoration procedure by actual testing or by simulation.	N/A	N/A	N/A	The Transmission Operator or Balancing Authority did not verify the restoration procedure by actual testing or by simulation.
EOP-005-1	R8.	Each Transmission Operator shall verify that the number, size, availability, and location of system blackstart generating units are sufficient to meet Regional Reliability Organization restoration plan requirements for the Transmission Operator's area.	N/A	N/A	N/A	The Transmission Operator failed to verify that the number, size, availability, and location of system blackstart generating units are sufficient to meet Regional Reliability Organization restoration plan requirements for the Transmission Operator's area.
EOP-005-1	R9.	The Transmission Operator shall document the Cranking Paths, including initial switching requirements, between each	N/A	N/A	The Transmission Operator documented the Cranking Paths, including initial switching requirements, between each	The Transmission Operator failed to document the Cranking Paths, including initial switching requirements, between each

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		blackstart generating unit and the unit(s) to be started and shall provide this documentation for review by the Regional Reliability Organization upon request. Such documentation may include Cranking Path diagrams.			blackstart generating unit and the unit(s) to be started, but did not provide the documentation as requested by the Regional Reliability Organization.	blackstart generating unit and the unit(s) to be started.
EOP-005-1	R10.	The Transmission Operator shall demonstrate, through simulation or testing, that the blackstart generating units in its restoration plan can perform their intended functions as required in the regional restoration plan.	For less than 25% of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate, through simulation or testing, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.	For 25% or more, but less than 50% of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate, through simulation or testing, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.	For 50% or more, but less than 75% of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate, through simulation or testing, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.	For 75% or more of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate, through simulation or testing, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.
EOP-005-1	R10.1.	The Transmission Operator shall perform this simulation or testing at least once every five years.	N/A	N/A	N/A	The Transmission Operator failed to perform the required simulation or testing at least once every five years.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
EOP-005-1	R11.5.	The affected Transmission Operators may resynchronize the isolated area(s) with the surrounding area(s) when the following conditions are met:	N/A	N/A	N/A	The Transmission Operator attempted to resynchronize an isolated area(s) with a surrounding area(s) when one (1) or more of the sub-requirements of R11.5 were not met.
EOP-005-1	R11.5.1.	Voltage, frequency, and phase angle permit.	N/A	N/A	N/A	N/A
EOP-005-1	R11.5.2.	The size of the area being reconnected and the capacity of the transmission lines effecting the reconnection and the number of synchronizing points across the system are considered.	N/A	N/A	N/A	N/A
EOP-005-1	R11.5.3.	Reliability Coordinator(s) and adjacent areas are notified and Reliability Coordinator approval is given.	N/A	N/A	N/A	N/A
EOP-005-1	R11.5.4.	Load is shed in neighboring areas, if required, to permit successful	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		interconnected system restoration.				
EOP-006-1	R1.	Each Reliability Coordinator shall be aware of the restoration plan of each Transmission Operator in its Reliability Coordinator Area in accordance with NERC and regional requirements.	The Reliability Coordinator is not aware of 5% or less of its Transmission Operators' restoration plans.	The Reliability Coordinator is not aware of more than 5% up to (and including) 10% of its Transmission Operators' restoration plans.	The Reliability Coordinator is not aware of more than 10% up to (and including) 15% of its Transmission Operators' restoration plans.	The Reliability Coordinator is not aware of more than 15% of its Transmission Operators' restoration plans.
EOP-006-1	R2.	The Reliability Coordinator shall monitor restoration progress and coordinate any needed assistance.	N/A	N/A	The Reliability Coordinator failed to monitor restoration progress or failed to coordinate assistance.	The Reliability Coordinator failed to monitor restoration progress and failed to coordinate assistance.
EOP-006-1	R3.	The Reliability Coordinator shall have a Reliability Coordinator Area restoration plan that provides coordination between individual Transmission Operator restoration plans and that ensures reliability is maintained during system restoration events.	N/A	The Reliability Coordinator's Reliability Coordinator Area restoration plan did not provide coordination between less than 10% of its individual Transmission Operator restoration plans.	The Reliability Coordinator's Reliability Coordinator Area restoration plan did not provide coordination between 10% or more of the Transmission Operator restoration plans.	The Reliability Coordinator does not have a Reliability Coordinator Area restoration plan. OR The Reliability Coordinator's Reliability Coordinator Area restoration plan does not ensure reliability is maintained during system restoration

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						events.
EOP-006-1	R4.	The Reliability Coordinator shall serve as the primary contact for disseminating information regarding restoration to neighboring Reliability Coordinators and Transmission Operators or Balancing Authorities not immediately involved in restoration.	N/A	N/A	N/A	The Reliability Coordinator failed to serve as primary contact for disseminating information regarding restoration in accordance with Requirement R4.
EOP-006-1	R5.	Reliability Coordinators shall approve, communicate, and coordinate the re-synchronizing of major system islands or synchronizing points so as not to cause a Burden on adjacent Transmission Operator, Balancing Authority, or Reliability	N/A	N/A	N/A	The Reliability Coordinator failed to approve, communicate, and coordinate the re-synchronizing of major system islands or synchronizing points as stated in Requirement R5.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Coordinator Areas.				
EOP-006-1	R6.	The Reliability Coordinator shall take actions to restore normal operations once an operating emergency has been mitigated in accordance with its restoration plan.	N/A	N/A	N/A	The Reliability Coordinator failed to take actions to restore normal operations once an operating emergency was mitigated in accordance with its restoration plan.
EOP-009-0	R2.	The Generator Owner or Generator Operator shall provide documentation of the test results of the startup and operation of each blackstart generating unit to the Regional Reliability Organizations and upon request to NERC.	N/A	N/A	N/A	The Generator Owner or Generator Operator did not provide the required blackstart documentation to its Regional Reliability Organization or upon request to NERC.

Violation Severity Level Matrix (FAC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
FAC-001-0	R1.	The Transmission Owner shall document, maintain, and publish facility connection requirements to ensure compliance with NERC Reliability Standards and applicable Regional Reliability Organization, subregional, Power Pool, and individual Transmission Owner planning criteria and facility connection requirements. The Transmission Owner's facility connection requirements shall address connection requirements for:	Not Applicable.	The Transmission Owner failed to do one of the following: Document or maintain or publish facility connection requirements as specified in the Requirement OR Failed to include one (1) of the components and specified in R1.1, R1.2 or R1.3.	The Transmission Owner failed to do one of the following: Document or maintain or publish its facility connection requirements as specified in the Requirement. OR Failed to include (2) of the components as specified in R1.1, R1.2 or R1.3 OR Failed to document or maintain or publish its facility connection requirements as specified in the Requirement **and** failed to include one (1) of the components as specified in R1.1, R1.2 or R1.3	The Transmission Owner did not develop facility connection requirements

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
FAC-001-0	R1.1.	Generation facilities,	N/A	N/A	N/A	N/A
FAC-001-0	R1.2.	Transmission facilities, and	N/A	N/A	N/A	N/A
FAC-001-0	R1.3.	End-user facilities	N/A	N/A	N/A	N/A
FAC-001-0	R3.	The Transmission Owner shall maintain and update its facility connection requirements as required. The Transmission Owner shall make documentation of these requirements available to the users of the transmission system, the Regional Reliability Organization, and NERC on request (five business days).	The responsible entity made the requirements available more than five business days but less than or equal to 10 business days after a request.	The responsible entity made the requirements available more than 10 business days but less than or equal to 20 business days after a request.	The responsible entity made the requirements available more than 20 business days less than or equal to 30 business days after a request.	The responsible entity made the requirements available more than 30 business days after a request.
FAC-002-0	R1.	The Generator Owner, Transmission Owner, Distribution Provider, and Load-Serving Entity seeking to integrate generation facilities, transmission facilities, and electricity end-user	The responsible entity failed to include in its assessment one of the subcomponents (R1.1 to R1.5).	The responsible entity failed to include in its assessment two of the subcomponents (R1.1 to R1.5).	The responsible entity failed to include in its assessment three of the subcomponents (R1.1 to R1.5).	The responsible entity failed to include in its assessment four or more of the subcomponents (R1.1 to R1.5).

Violation Severity Level Matrix (FAC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		facilities shall each coordinate and cooperate on its assessments with its Transmission Planner and Planning Authority. The assessment shall include:				
FAC-002-0	R1.1.	Evaluation of the reliability impact of the new facilities and their connections on the interconnected transmission systems.	N/A	N/A	N/A	N/A
FAC-002-0	R1.2.	Ensurance of compliance with NERC Reliability Standards and applicable Regional, subregional, Power Pool, and individual system planning criteria and facility connection requirements.	N/A	N/A	N/A	N/A
FAC-002-0	R1.3.	Evidence that the parties involved in the assessment have coordinated and cooperated on the assessment of the	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		reliability impacts of new facilities on the interconnected transmission systems. While these studies may be performed independently, the results shall be jointly evaluated and coordinated by the entities involved.				
FAC-002-0	R1.4.	Evidence that the assessment included steady-state, short-circuit, and dynamics studies as necessary to evaluate system performance in accordance with Reliability Standard TPL-001-0.	N/A	N/A	N/A	N/A
FAC-002-0	R1.5.	Documentation that the assessment included study assumptions, system performance, and alternatives considered, and jointly coordinated recommendations.	N/A	N/A	N/A	N/A
FAC-002-0	R2.	The Planning Authority, Transmission	The responsible entity provided the documentation more	The responsible entity provided the documentation more	The responsible entity provided the documentation more	The responsible entity provided the documentation more

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Planner, Generator Owner, Transmission Owner, Load-Serving Entity, and Distribution Provider shall each retain its documentation (of its evaluation of the reliability impact of the new facilities and their connections on the interconnected transmission systems) for three years and shall provide the documentation to the Regional Reliability Organization(s) and NERC on request (within 30 calendar days).	than 30 calendar days but less than or equal to 40 calendar days after a request.	than 40 calendar days but less than or equal to 50 calendar days after a request.	than 50 calendar days but less than or equal to 60 calendar days after a request.	than 60 calendar days after a request or was unable to provide the documentation for the required three-year period.
FAC-003-1	R1.	The Transmission owner shall prepare, and keep current, a formal transmission vegetation management program (TVMP). The TVMP shall include the Transmission	The responsible entity did not include and keep current one of the four required elements of its TVMP, as directed by the requirement.	The responsible entity did not include and keep current two of the four required elements of its TVMP, as directed by the requirement.	The responsible entity did not include and keep current three of the four required elements of its TVMP, as directed by the requirement.	The responsible entity did not include and keep current all required elements of the TVMP, as directed by the requirement.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Owner's objectives, practices, approved procedures, and work Specifications. 1. ANSI A300, Tree Care Operations – Tree, Shrub, and Other Woody Plant Maintenance – Standard Practices, while not a requirement of this standard, is considered to be an industry best practice.				
FAC-003-1	R1.2.	The Transmission Owner, in the TVMP, shall identify and document clearances between vegetation and any overhead, ungrounded supply conductors, taking into consideration transmission line voltage, the effects of ambient temperature on conductor sag under maximum design loading, and the effects of wind velocities on	N/A	N/A	N/A	The responsible entity, in its TVMP, failed to identify and document clearances between vegetation and any overhead, ungrounded supply conductors. OR The responsible entity, in its TVMP, failed to take into consideration transmission line voltage, or the effects of ambient temperature on conductor sag under

Violation Severity Level Matrix (FAC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		conductor sway. Specifically, the Transmission Owner shall establish clearances to be achieved at the time of vegetation management work identified herein as Clearance 1, and shall also establish and maintain a set of clearances identified herein as Clearance 2 to prevent flashover between vegetation and overhead ungrounded supply conductors.				maximum design loading, or the effects of wind velocities on conductor sway. OR The responsible entity, in its TVMP, failed to establish Clearance 1 or Clearance 2 values.
FAC-003-1	R1.2.1.	Clearance 1 — The Transmission Owner shall determine and document appropriate clearance distances to be achieved at the time of transmission vegetation management work based upon local conditions and the expected time frame in which the Transmission Owner	N/A	N/A	N/A	The responsible entity failed to determine and document an appropriate clearance distance to be achieved at the time of transmission vegetation management work taking into account local conditions and the expected time frame in which the responsible entity

Violation Severity Level Matrix (FAC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		plans to return for future vegetation management work. Local conditions may include, but are not limited to: operating voltage, appropriate vegetation management techniques, fire risk, reasonably anticipated tree and conductor movement, species types and growth rates, species failure characteristics, local climate and rainfall patterns, line terrain and elevation, location of the vegetation within the span, and worker approach distance requirements. Clearance 1 distances shall be greater than those defined by Clearance 2 below.				expects to return for future vegetation management work. OR The responsible entity documented a Clearance 1 value that was smaller than its Clearance 2 value.
FAC-003-1	R1.2.2.	Clearance 2 — The Transmission Owner shall determine and document specific	N/A	N/A	N/A	The responsible entity failed to determine and document Clearance

Violation Severity Level Matrix (FAC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		radial clearances to be maintained between vegetation and conductors under all rated electrical operating conditions. These minimum clearance distances are necessary to prevent flashover between vegetation and conductors and will vary due to such factors as altitude and operating voltage. These Transmission Owner-specific minimum clearance distances shall be no less than those set forth in the Institute of Electrical and Electronics Engineers (IEEE) Standard 516-2003 (*Guide for Maintenance Methods on Energized Power Lines*) and as specified in its Section 4.2.2.3, Minimum Air				2 values taking into account local conditions and the expected time frame in which the responsible entity expects to return for future vegetation management work.

Violation Severity Level Matrix (FAC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Insulation Distances without Tools in the Air Gap.				
FAC-003-1	R1.2.2.1.	Where transmission system transient overvoltage factors are not known, clearances shall be derived from Table 5, IEEE 516-2003, phase-to-ground distances, with appropriate altitude correction factors applied.	N/A	N/A	N/A	Where transmission system transient overvoltage factors were known, clearances were not derived from Table 5, IEEE 516-2003, phase-to-phase voltages, with appropriate altitude correction factors applied.
FAC-003-1	R1.3.	All personnel directly involved in the design and implementation of the TVMP shall hold appropriate qualifications and training, as defined by the Transmission Owner, to perform their duties.	For responsible entities directly involving fewer than 20 persons in the design and implementation of the TVMP, one of those persons did not hold appropriate qualifications and training to perform their duties. For responsible entities directly involving 20 or more persons in the design and implementation of the TVMP, 5% or less of those persons	For responsible entities directly involving fewer than 20 persons in the design and implementation of the TVMP, two of those persons did not hold appropriate qualifications and training to perform their duties. For responsible entities directly involving 20 or more persons in the design and implementation of the TVMP, more than 5% up to (and	For responsible entities directly involving fewer than 20 persons in the design and implementation of the TVMP, three of those persons did not hold appropriate qualifications and training to perform their duties. For responsible entities directly involving 20 or more persons in the design and implementation of the TVMP, more than 10% up to (and	For responsible entities directly involving fewer than 20 persons in the design and implementation of the TVMP, more than three of those persons did not hold appropriate qualifications and training to perform their duties. For responsible entities directly involving 20 or more persons in the design and implementation of the TVMP, more

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			did not hold appropriate qualifications and training to perform their duties.	including) 10%of those persons did not hold appropriate qualifications and training to perform their duties.	including) 15%of those persons did not hold appropriate qualifications and training to perform their duties.	than 15% of those persons did not hold appropriate qualifications and training to perform their duties.
FAC-003-1	R1.4.	Each Transmission Owner shall develop mitigation measures to achieve sufficient clearances for the protection of the transmission facilities when it identifies locations on the ROW where the Transmission Owner is restricted from attaining the clearances specified in Requirement 1.2.1.	N/A	N/A	N/A	The responsible entity's TVMP does not include mitigation measures to achieve sufficient clearances where restrictions to the ROW are in effect.
FAC-003-1	R1.5.	Each Transmission Owner shall establish and document a process for the immediate communication of vegetation conditions that present an imminent threat of a transmission line outage. This is so	N/A	N/A	N/A	The responsible entity did not establish or did not document a process for the immediate communication of vegetation conditions that present an imminent threat of line outage, as directed by the requirement.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		that action (temporary reduction in line rating, switching line out of service, etc.) may be taken until the threat is relieved.				
FAC-003-1	R2.	The Transmission Owner shall create and implement an annual plan for vegetation management work to ensure the reliability of the system. The plan shall describe the methods used, such as manual clearing, mechanical clearing, herbicide treatment, or other actions. The plan should be flexible enough to adjust to changing conditions, taking into consideration anticipated growth of vegetation and all other environmental factors that may have an impact on the reliability of the transmission systems.	The responsible entity did not meet one of the three required elements (including in the annual plan a description of methods used for vegetation management, maintaining documentation of adjustments to the annual plan, or having systems and procedures for tracking work performed as part of the annual plan) specified in the requirement.	The responsible entity did not meet two of the three required elements (including in the annual plan a description of methods used for vegetation management, maintaining documentation of adjustments to the annual plan, or having systems and procedures for tracking work performed as part of the annual plan) specified in the requirement.	The responsible entity did not meet the three required elements (including in the annual plan a description of methods used for vegetation management, maintaining documentation of adjustments to the annual plan, or having systems and procedures for tracking work performed as part of the annual plan) specified in the requirement.	The responsible entity does not have an annual plan for vegetation management. OR The responsible entity has not implemented the annual plan for vegetation management.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Adjustments to the plan shall be documented as they occur. The plan should take into consideration the time required to obtain permissions or permits from landowners or regulatory authorities. Each Transmission Owner shall have systems and procedures for documenting and tracking the planned vegetation management work and ensuring that the vegetation management work was completed according to work specifications.				
FAC-003-1	R3.	The Transmission Owner shall report quarterly to its RRO, or the RRO's designee, sustained transmission line outages determined by the Transmission Owner to have been caused by	The responsible entity failed to provide a quarterly outage report, but did not experience any reportable outages. OR The responsible entity provided a	The responsible entity provided a quarterly report, but failed to include information required by R3.3.	The responsible entity provided a quarterly outage report, but failed to include a reportable Category 3 outage as described in R3.4.3.	The responsible entity experienced reportable outages but failed to provide a quarterly report. OR The responsible entity provided a quarterly outage

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		vegetation.	quarterly report, but failed to report in the manner specified by one or more of the following subcomponents of R3: R3.1 or R3.2.			report, but failed to include a reportable Category 1 (as described in R3.4.1) or Category 2 outage (as described in R3.4.2).
FAC-003-1	R3.1.	Multiple sustained outages on an individual line, if caused by the same vegetation, shall be reported as one outage regardless of the actual number of outages within a 24-hour period.	N/A	N/A	N/A	N/A
FAC-003-1	R3.2.	The Transmission Owner is not required to report to the RRO, or the RRO's designee, certain sustained transmission line outages caused by vegetation: (1) Vegetation-related outages that result from vegetation falling into lines from outside the ROW that result from natural disasters shall not be	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		considered reportable (examples of disasters that could create non-reportable outages include, but are not limited to, earthquakes, fires, tornados, hurricanes, landslides, wind shear, major storms as defined either by the Transmission Owner or an applicable regulatory body, ice storms, and floods), and (2) Vegetation-related outages due to human or animal activity shall not be considered reportable (examples of human or animal activity that could cause a non-reportable outage include, but are not limited to, logging, animal severing tree, vehicle contact with tree, arboricultural activities or horticultural or				

Violation Severity Level Matrix (FAC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		agricultural activities, or removal or digging of vegetation).				
FAC-003-1	R3.3.	The outage information provided by the Transmission Owner to the RRO, or the RRO's designee, shall include at a minimum: the name of the circuit(s) outaged, the date, time and duration of the outage; a description of the cause of the outage; other pertinent comments; and any countermeasures taken by the Transmission Owner.	N/A	N/A	N/A	N/A
FAC-003-1	R3.4.	An outage shall be categorized as one of the following:	N/A	N/A	N/A	N/A
FAC-003-1	R3.4.1.	Category 1 — Grow-ins: Outages caused by vegetation growing into lines from vegetation inside and/or outside of the ROW;	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
FAC-003-1	R3.4.2.	Category 2 — Fall-ins: Outages caused by vegetation falling into lines from inside the ROW;	N/A	N/A	N/A	N/A
FAC-003-1	R3.4.3.	Category 3 — Fall-ins: Outages caused by vegetation falling into lines from outside the ROW.	N/A	N/A	N/A	N/A
FAC-008-1	R1.	The Transmission Owner and Generator Owner shall each document its current methodology used for developing Facility Ratings (Facility Ratings Methodology) of its solely and jointly owned Facilities. The methodology shall include all of the following:	The responsible entity failed to include in their methodology one of the subcomponents of R1.3, (R1.3.1 to R1.3.5).	The responsible entity failed to include in their methodology two of the subcomponents of R1.3, (R1.3.1 to R1.3.5).	The responsible entity rating methodology did not address either of the sub-components of R1.2 (R1.2.1 or R1.2.2). OR The responsible entity failed to include in their methodology three of the subcomponents of R1.3, (R1.3.1 to R1.3.5).	The Transmission Owner or Generation Owner does not have a documented Facility Ratings Methodology for use in developing facility ratings. The responsible entity's rating methodology failed to recognize a facility's rating based on the most limiting component rating as required in R1.1. OR The responsible entity rating methodology did not address the components of R1.2, (R1.2.1 and R1.2.2).

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						OR The responsible entity failed to include in their methodology four or more of the subcomponents of R1.3, (R1.3.1 to R1.3.5).
FAC-008-1	R1.1.	A statement that a Facility Rating shall equal the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.	N/A	N/A	N/A	N/A
FAC-008-1	R1.2.	The method by which the Rating (of major BES equipment that comprises a Facility) is determined.	N/A	N/A	N/A	N/A
FAC-008-1	R1.2.1.	The scope of equipment addressed shall include, but not be limited to, generators, transmission conductors, transformers, relay protective devices, terminal equipment,	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		and series and shunt compensation devices.				
FAC-008-1	R1.2.2.	The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.	N/A	N/A	N/A	N/A
FAC-008-1	R1.3.	Consideration of the following:	N/A	N/A	N/A	N/A
FAC-008-1	R1.3.1.	Ratings provided by equipment manufacturers.	N/A	N/A	N/A	N/A
FAC-008-1	R1.3.2.	Design criteria (e.g., including applicable references to industry Rating practices such as manufacturer's warranty, IEEE, ANSI or other standards).	N/A	N/A	N/A	N/A
FAC-008-1	R1.3.3.	Ambient conditions.	N/A	N/A	N/A	N/A
FAC-008-1	R1.3.4.	Operating limitations.	N/A	N/A	N/A	N/A
FAC-008-1	R1.3.5.	Other assumptions.	N/A	N/A	N/A	N/A
FAC-008-1	R2.	The Transmission Owner and Generator Owner shall each make its	The responsible entity made the Facility Ratings Methodology	The responsible entity made the Facility Ratings Methodology	The responsible entity made the Facility Ratings Methodology	The responsible entity failed to make available the Facility Ratings

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Facility Ratings Methodology available for inspection and technical review by those Reliability Coordinators, Transmission Operators, Transmission Planners, and Planning Authorities that have responsibility for the area in which the associated Facilities are located, within 15 business days of receipt of a request.	available within more than 15 business days but less than or equal to 25 business days after a request.	available within more than 25 business days but less than or equal to 35 business days after a request.	available within more than 35 business days but less than or equal to 45 business days after a request.	Methodology available in more than 45 business days after a request.
FAC-008-1	R3.	If a Reliability Coordinator, Transmission Operator, Transmission Planner, or Planning Authority provides written comments on its technical review of a Transmission Owner's or Generator Owner's Facility Ratings Methodology, the Transmission Owner or Generator Owner	The responsible entity provided a response in more than 45 calendar days but less than or equal to 60 calendar days after a request.	The responsible entity provided a response in more than 60 calendar days but less than or equal to 70 calendar days after a request. OR The responsible entity provided a response within 45 calendar days, and the response indicated that a change will not be	The responsible entity provided a response in more than 70 calendar days but less than or equal to 80 calendar days after a request. OR The responsible entity provided a response within 45 calendar days, but the response did not indicate whether a change will be made	The responsible entity failed to provide a response as required in more than 80 calendar days after a request.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		shall provide a written response to that commenting entity within 45 calendar days of receipt of those comments. The response shall indicate whether a change will be made to the Facility Ratings Methodology and, if no change will be made to that Facility Ratings Methodology, the reason why.		made to the Facility Ratings Methodology but did not indicate why no change will be made.	to the Facility Ratings Methodology.	
FAC-009-1	R1.	The Transmission Owner and Generator Owner shall each establish Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings Methodology.	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings Methodology for 5% or less of its solely owned and jointly owned Facilities.	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings Methodology for more than 5% up to (and including) 10% of its solely owned and jointly owned Facilities.	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings Methodology for more than 10% up to (and including) 15% of its solely owned and jointly owned Facilities.	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings Methodology for more than 15% of its solely owned and jointly owned Facilities.
FAC-013-1	R1.	The Reliability Coordinator and Planning Authority shall each establish a	The responsible entity has established a set of Transfer	The responsible entity has established a set of Transfer	The responsible entity has established a set of Transfer	The responsible entity has established a set of Transfer

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		set of inter-regional and intra-regional Transfer Capabilities that is consistent with its current Transfer Capability Methodology.	Capabilities, but 5% or less of all Transfer Capabilities required to be established, are inconsistent with the current Transfer Capability Methodology.	Capabilities, but more than 5% up to (and including) 10% of all Transfer Capabilities required to be established, are inconsistent with the current Transfer Capability Methodology.	Capabilities, but more than 10% up to (and including) 15% of all Transfer Capabilities required to be established, are inconsistent with the current Transfer Capability Methodology.	Capabilities, but more than 15% of those Transfer Capabilities are not consistent with the current Transfer Capability Methodology OR The responsible entity has not established a set of Transfer Capabilities.
FAC-013-1	R2.1.	The Reliability Coordinator shall provide its Transfer Capabilities to its associated Regional Reliability Organization(s), to its adjacent Reliability Coordinators, and to the Transmission Operators, Transmission Service Providers and Planning Authorities that work in its Reliability Coordinator Area.	The responsible entity failed to provide Transfer Capabilities to 5% or less of the required entities.	The responsible entity failed to provide Transfer Capabilities to more than 5% up to (and including) 10% of the required entities.	The responsible entity failed to provide Transfer Capabilities to more than 10% up to (and including) 15% of the required entities.	The responsible entity failed to provide Transfer Capabilities to more than 15% of the required entities.
FAC-013-1	R2.2.	The Planning	The responsible	The responsible	The responsible	The responsible

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Authority shall provide its Transfer Capabilities to its associated Reliability Coordinator(s) and Regional Reliability Organization(s), and to the Transmission Planners and Transmission Service Provider(s) that work in its Planning Authority Area.	entity failed to provide Transfer Capabilities 5% or less of the required entities.	entity failed to provide Transfer Capabilities to more than 5% up to (and including) 10% of the required entities.	entity failed to provide Transfer Capabilities to more than 10% up to (and including) 15% of the required entities.	entity failed to provide Transfer Capabilities to more than 15% of the required entities.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
INT-003-2	R1.	Each Receiving Balancing Authority shall confirm Interchange Schedules with the Sending Balancing Authority prior to implementation in the Balancing Authority's ACE equation.	N/A	The responsible entity confirmed Interchange Schedule with the Sending Balancing Authority ACE equation and the responsible Entities reached agreement; and coordinated the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2; but the agreement did not include one of the elements required in sub-requirements R1.1.1 or R1.1.2.	The responsible entity confirmed Interchange Schedule with the Sending Balancing Authority prior to implementation in the Balancing Authority ACE equation and the responsible Entities reached agreement but did not coordinate the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2.	The responsible entity failed to confirm Interchange Schedule with the Sending Balancing Authority prior to implementation in the Authority's ACE equation. OR The responsible entity failed to agree on the interchange as received from the Interchange Authority prior to implementation in the Balancing Authority's ACE equation.
INT-003-2	R1.1.	The Sending Balancing Authority and Receiving Balancing Authority shall agree on Interchange as received from the Interchange Authority, including:	N/A	N/A	N/A	N/A
INT-003-2	R1.1.1.	Interchange Schedule start and	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		end time.				
INT-003-2	R1.1.2.	Energy profile.	N/A	N/A	N/A	N/A
INT-003-2	R1.2.	If a high voltage direct current (HVDC) tie is on the Scheduling Path, then the Sending Balancing Authorities and Receiving Balancing Authorities shall coordinate the Interchange Schedule with the Transmission Operator of the HVDC tie.	N/A	N/A	N/A	N/A
INT-004-2	R2.	The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occurs:	N/A	N/A	The responsible entity failed to update the tag when required by sub-requirements R2.1 or R2.2.	The responsible entity failed to update the tag when required by sub-requirement R2.3.
INT-004-2	R2.1.	The average energy profile in an hour is greater than 250	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than +10%.				
INT-004-2	R2.2.	The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than +25 megawatt-hours.	N/A	N/A	N/A	N/A
INT-004-2	R2.3.	A Reliability Coordinator or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and the reasons.	N/A	N/A	N/A	N/A
INT-005-3	R1.1.	When a Balancing	N/A	N/A	The Responsible	The Responsible

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Authority or Reliability Coordinator initiates a Curtailment to Confirmed or Implemented Interchange for reliability, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment only to the Source Balancing Authority and the Sink Balancing Authority.			Entity initiated a Curtailment to Confirmed or Implemented Interchange for reliability but the Interchange Authority failed to distribute the Arranged Interchange information to the Source Balancing Authority or the Sink Balancing Authority.	Entity initiated a Curtailment to Confirmed or Implemented Interchange for reliability but the Interchange Authority failed to distribute the Arranged Interchange information to the Source Balancing Authority and the Sink Balancing Authority.
INT-009-1	R1.	The Balancing Authority shall implement Confirmed Interchange as received from the Interchange Authority.	N/A	N/A	N/A	The responsible entity failed to implement a Confirmed Interchange as received from the Interchange Authority.
INT-010-1	R1.	The Balancing Authority that experiences a loss of resources covered by an energy sharing agreement shall	The responsible entity that experienced a loss of resources that exceeded 60 minutes and was covered by	The responsible entity that experienced a loss of resources that exceeded 60 minutes and was covered by	The responsible entity that experienced a loss of resources that exceeded 60 minutes and was covered by	The responsible entity that experienced a loss of resources that exceeded 60 minutes and was covered by

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		ensure that a request for an Arranged Interchange is submitted with a start time no more than 60 minutes beyond the resource loss. If the use of the energy sharing agreement does not exceed 60 minutes from the time of the resource loss, no request for Arranged Interchange is required.	an energy sharing agreement ensured that a request for an Arranged Interchange was submitted, but with a start time that was more than 60 minutes but less than 75 minutes beyond the resource loss.	an energy sharing agreement ensured that a request for an Arranged Interchange was submitted, but with a start time that was 75 minutes or more, but less than 90 minutes beyond the resource loss.	an energy sharing agreement ensured that a request for an Arranged Interchange was submitted, but with a start time that was 90 minutes or more, but less than 105 minutes beyond the resource loss.	an energy sharing agreement ensured that a request for an Arranged Interchange was submitted, but with a start time that was more than 105 minutes beyond the resource loss. OR The responsible entity that experienced a loss of resources that exceeded 60 minutes and was covered by an energy sharing agreement, failed to ensure that a request for an Arranged Interchange was submitted.
INT-010-1	R2.	For a modification to an existing Interchange schedule that is directed by a Reliability Coordinator for current or imminent reliability-related reasons, the Reliability Coordinator shall	N/A	N/A	N/A	The responsible entity failed to direct a Balancing Authority to submit the modified Arranged Interchange reflecting the modification, within 60 minutes of the initiation of the

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		direct a Balancing Authority to submit the modified Arranged Interchange reflecting that modification within 60 minutes of the initiation of the event.				event.
INT-010-1	R3.	For a new Interchange schedule that is directed by a Reliability Coordinator for current or imminent reliability-related reasons, the Reliability Coordinator shall direct a Balancing Authority to submit an Arranged Interchange reflecting that Interchange schedule within 60 minutes of the initiation of the event.	N/A	N/A	N/A	The responsible entity failed to direct a Balancing Authority to submit an Arranged Interchange reflecting the new Interchange schedule within 60 minutes of the initiation of the event.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
IRO-001-1.1	R5.	The Reliability Coordinator shall list within its reliability plan all entities to which the Reliability Coordinator has delegated required tasks.	5% or less of the delegate entities are not identified in the reliability plan.	More than 5% up to (and including) 10% of the delegate entities are not identified in the reliability plan.	More than 10% up to (and including) 15% of the delegate entities are not identified in the reliability plan.	There is no reliability plan. OR More than 15% of the delegate entities are not identified in the reliability plan.
IRO-001-1.1	R6.	The Reliability Coordinator shall verify that all delegated tasks are carried out by NERC-certified Reliability Coordinator operating personnel.	The Reliability Coordinator failed to demonstrate that 5% or less of its delegated tasks were being performed by NERC certified Reliability Coordinator operating personnel.	The Reliability Coordinator failed to demonstrate that more than 5% up to (and including) 10% of its delegated tasks were being performed by NERC certified Reliability Coordinator operating personnel.	The Reliability Coordinator failed to demonstrate that more than 10% up to (and including) 15% of its delegated tasks were being performed by NERC certified Reliability Coordinator operating personnel.	The Reliability Coordinator failed to demonstrate that more than 15% of its delegated tasks were being performed by NERC certified Reliability Coordinator operating personnel.
IRO-001-1.1	R8.	Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall comply with Reliability Coordinator directives unless such actions would violate safety, equipment, or regulatory or	N/A	The responsible entity could not comply with a directive due to qualified reasons (violation of safety, equipment or regulatory or statutory	N/A	The responsible entity did not follow the Reliability Coordinator's directive.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		statutory requirements. Under these circumstances, the Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, or Purchasing-Selling Entity shall immediately inform the Reliability Coordinator of the inability to perform the directive so that the Reliability Coordinator may implement alternate remedial actions.		requirements) and did not immediately inform the Reliability Coordinator.		
IRO-001-1.1	R9.	The Reliability Coordinator shall act in the interests of reliability for the overall Reliability Coordinator Area and the Interconnection before the interests of any other entity.	N/A	N/A	N/A	The Reliability Coordinator did not act in the interests of reliability for the overall Reliability Coordinator Area and the Interconnection before the interests of one or more other entities.
IRO-002-1	R1.	Each Reliability Coordinator shall have adequate communications facilities (voice and data links) to appropriate entities within its Reliability Coordinator Area. These communications facilities shall be staffed and available to act	The Reliability Coordinator demonstrated that it has adequate voice communication facilities and staff but is deficient by 5% or less of its needed data links for at least one of the	The Reliability Coordinator demonstrated that it has adequate voice communication facilities and staff but is deficient with	The Reliability Coordinator demonstrated that it has adequate voice communication facilities and staff but is deficient for	The Reliability Coordinator demonstrated that it has adequate voice communication facilities and staff

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		in addressing a real-time emergency condition.	appropriate entities within its Reliability Coordinator Area.	more than 5% up to (and including) 10% of its needed data links for at least one of the appropriate entities within its Reliability Coordinator Area.	more than 10% up to (and including) 15% of its needed data links for at least one of the appropriate entities within its Reliability Coordinator Area.	but is deficient for more than 15% of its needed data links for at least one of the appropriate entities with which it interfaces. OR The Reliability Coordinator demonstrated that it has adequate voice and data communications facilities with all appropriate entities within its Reliability Coordinator Area but failed to have sufficient staff to address a real-time emergency event. OR The Reliability Coordinator failed to demonstrate it has adequate voice communications facilities with appropriate

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						entities within its Reliability Coordinator Area.
IRO-002-1	R2.	Each Reliability Coordinator shall determine the data requirements to support its reliability coordination tasks and shall request such data from its Transmission Operators, Balancing Authorities, Transmission Owners, Generation Owners, Generation Operators, and Load-Serving Entities, or adjacent Reliability Coordinators.	The Reliability Coordinator failed to demonstrate that it determined and requested the data requirements needed to support its reliability coordination tasks from **One** of the applicable entities with which it interfaces.	The Reliability Coordinator failed to demonstrate that it determined and requested the data requirements needed to support its reliability coordination tasks from **Two** of the applicable entities with which it interfaces.	The Reliability Coordinator failed to demonstrate that it determined and requested the data requirements needed to support its reliability coordination tasks from **Three** of the applicable entities with which it interfaces.	The Reliability Coordinator failed to demonstrate that it determined and requested the data requirements needed to support its reliability coordination tasks from **Four or more** of the applicable entities with which it interfaces.
IRO-002-1	R3.	Each Reliability Coordinator – or its Transmission Operators and Balancing Authorities – shall provide, or arrange provisions for, data exchange to other Reliability Coordinators or Transmission Operators and Balancing Authorities via a secure network.	The responsible entity failed to demonstrate it provided or arranged provision for the exchange of data with 5% or less of the other Reliability Coordinators or Transmission Operators and Balancing Authorities.	The responsible entity failed to demonstrate it provided or arranged provision for the exchange of data with more than 5% up to (and including) 10% of the other Reliability Coordinators or Transmission Operators and Balancing Authorities.	The responsible entity failed to demonstrate it provided or arranged provision for the exchange of data with more than 10% up to (and including) 15% of the other Reliability Coordinators or Transmission Operators and Balancing Authorities.	The responsible entity failed to demonstrate it provided or arranged provision for the exchange of data with more than 15% of the other Reliability Coordinators or Transmission Operators and Balancing Authorities.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
IRO-002-1	R4.	Each Reliability Coordinator shall have multi-directional communications capabilities with its Transmission Operators and Balancing Authorities, and with neighboring Reliability Coordinators, for both voice and data exchange as required to meet reliability needs of the Interconnection.	The Reliability Coordinator has failed to demonstrate multi-directional communication capabilities to 5% or less of the applicable entities with which it interfaces.	The Reliability Coordinator has failed to demonstrate multi-directional communication capabilities to more than 5% up to (and including) 10% of the applicable entities with which it interfaces.	The Reliability Coordinator has failed to demonstrate multi-directional communication capabilities to more than 10% up to (and including) 15% of the applicable entities with which it interfaces.	The Reliability Coordinator has failed to demonstrate multi-directional communication capabilities with more than 15% of the applicable entities with which it interfaces.
IRO-002-1	R5.	Each Reliability Coordinator shall have detailed real-time monitoring capability of its Reliability Coordinator Area and sufficient monitoring capability of its surrounding Reliability Coordinator Areas to ensure that potential or actual System Operating Limit or Interconnection Reliability Operating Limit violations are identified. Each Reliability Coordinator shall have monitoring systems that provide information that can be easily understood and interpreted by the Reliability Coordinator's operating personnel, giving particular emphasis to alarm management and awareness systems, automated data transfers, and synchronized	The Reliability Coordinator's SOL/IROL monitoring systems provide information in a way that is not easily understood and interpreted by the Reliability Coordinator's operating personnel.	The Reliability Coordinator's SOL/IROL monitoring systems did not give particular emphasis to One of the following: • alarm management and awareness systems • automated data transfers • synchronized information systems	The Reliability Coordinator's SOL/IROL monitoring systems did not give particular emphasis to Two of the following: • alarm management and awareness systems • automated data transfers • synchronized information systems	The Reliability Coordinator's SOL/IROL monitoring systems did not give particular emphasis to any of the following: • alarm management and awareness systems • automated data transfers • synchronized information systems. OR

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		information systems, over a redundant and highly reliable infrastructure.				The Reliability Coordinator's SOL/IROL monitoring systems were not implemented over a highly reliable redundant infrastructure.
IRO-002-1	R7.	Each Reliability Coordinator shall have adequate analysis tools such as state estimation, pre- and post-contingency analysis capabilities (thermal, stability, and voltage), and wide-area overview displays.	N/A	N/A	N/A	The Reliability Coordinator failed to demonstrate that it has adequate analysis tools such as: • State estimation • Pre-contingency analysis capability (thermal, stability, and • voltage); • Post-contingency analysis capability (thermal, stability, and voltage),

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						• Wide-area overview displays.
IRO-002-1	R8.	Each Reliability Coordinator shall continuously monitor its Reliability Coordinator Area. Each Reliability Coordinator shall have provisions for backup facilities that shall be exercised if the main monitoring system is unavailable. Each Reliability Coordinator shall ensure SOL and IROL monitoring and derivations continue if the main monitoring system is unavailable.	.N/A	The Reliability Coordinator demonstrated provisions for back-up facilities, but it failed to continuously monitor SOL/IROL conditions when the main monitoring system was unavailable.	N/A	The Reliability Coordinator failed to demonstrate provisions for back-up facilities AND The Reliability Coordinator failed to continuously monitor SOL/IROL conditions when the main monitoring system was unavailable.
IRO-004-1	R1.	Each Reliability Coordinator shall conduct next-day reliability analyses for its Reliability Coordinator Area to ensure that the Bulk Electric System can be operated reliably in anticipated normal and Contingency event conditions. The Reliability Coordinator shall conduct Contingency analysis studies to identify potential interface and other SOL and IROL violations, including overloaded transmission lines and transformers, voltage and	The Reliability Coordinator failed to conduct next-day reliability analyses or contingency analysis for its Reliability Coordinator Area for one (1) day during a calendar month.	The Reliability Coordinator failed to conduct next-day reliability analyses or contingency analysis for its Reliability Coordinator Area for two (2) to three (3) days during a calendar month.	The Reliability Coordinator failed to conduct next-day reliability analyses or contingency analysis for its Reliability Coordinator Area for four (4) to five (5) days during a calendar month.	The Reliability Coordinator failed to conduct next-day reliability analyses or contingency analysis for its Reliability Coordinator Area for more than five (5) days during a calendar month.

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		stability limits, etc.				
IRO-004-1	R2.	Each Reliability Coordinator shall pay particular attention to parallel flows to ensure one Reliability Coordinator Area does not place an unacceptable or undue Burden on an adjacent Reliability Coordinator Area.	N/A	N/A	N/A	The Reliability Coordinator failed to monitor parallel flows to ensure one Reliability Coordinator Area did not place an unacceptable or undue Burden on an adjacent Reliability Coordinator Area.
IRO-004-1	R3.	Each Reliability Coordinator shall, in conjunction with its Transmission Operators and Balancing Authorities, develop action plans that may be required, including reconfiguration of the transmission system, re-dispatching of generation, reduction or curtailment of Interchange Transactions, or reducing load to return transmission loading to within acceptable SOLs or IROLs.	The Reliability Coordinator, in conjunction with its Transmission Operators and Balancing Authorities, failed to develop action plans that may be required, including reconfiguration of the transmission system, re-dispatching of generation, reduction or curtailment of Interchange Transactions, or reducing load to return transmission loading to within acceptable SOLs or IROLs for one (1) day during a calendar month.	The Reliability Coordinator, in conjunction with its Transmission Operators and Balancing Authorities, failed to develop action plans that may be required, including reconfiguration of the transmission system, re-dispatching of generation, reduction or curtailment of Interchange Transactions, or	The Reliability Coordinator, in conjunction with its Transmission Operators and Balancing Authorities, failed to develop action plans that may be required, including reconfiguration of the transmission system, re-dispatching of generation, reduction or curtailment of Interchange Transactions, or	The Reliability Coordinator, in conjunction with its Transmission Operators and Balancing Authorities, failed to develop action plans that may be required, including reconfiguration of the transmission system, re-dispatching of generation, reduction or curtailment of Interchange Transactions, or

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				reducing load to return transmission loading to within acceptable SOLs or IROLs for two (2) to three (3) days during a calendar month.	reducing load to return transmission loading to within acceptable SOLs or IROLs for four (4) to five (5) days during a calendar month.	reducing load to return transmission loading to within acceptable SOLs or IROLs for more than five (5) days during a calendar month.
IRO-004-1	R4.	Each Transmission Operator, Balancing Authority, Transmission Owner, Generator Owner, Generator Operator, and Load-Serving Entity in the Reliability Coordinator Area shall provide information required for system studies, such as critical facility status, Load, generation, operating reserve projections, and known Interchange Transactions. This information shall be available by 1200 Central Standard Time for the Eastern Interconnection and 1200 Pacific Standard Time for the Western Interconnection.	The responsible entity in the Reliability Coordinator Area provided the information required for system studies, such as critical facility status, Load, generation, operating reserve projections, and known Interchange Transactions, but said information was provided after the required time as stated in IRO-004-1 R4 for one (1) day during a calendar month.	The responsible entity in the Reliability Coordinator Area provided the information required for system studies, such as critical facility status, Load, generation, operating reserve projections, and known Interchange Transactions, but said information was provided after the required time as stated in IRO-004-1 R4 for two (2) to three (3) days during a calendar month.	The responsible entity in the Reliability Coordinator Area provided the information required for system studies, such as critical facility status, Load, generation, operating reserve projections, and known Interchange Transactions, but said information was provided after the required time as stated in IRO-004-1 R4 for four (4) to five (5) days during a calendar month.	The responsible entity in the Reliability Coordinator Area provided the information required for system studies, such as critical facility status, Load, generation, operating reserve projections, and known Interchange Transactions, but said information was provided after the required time as stated in IRO-004-1 R4 for more than five (5) days during a calendar month.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
IRO-004-1	R5.	Each Reliability Coordinator shall share the results of its system studies, when conditions warrant or upon request, with other Reliability Coordinators and with Transmission Operators, Balancing Authorities, and Transmission Service Providers within its Reliability Coordinator Area. The Reliability Coordinator shall make study results available no later than 1500 Central Standard Time for the Eastern Interconnection and 1500 Pacific Standard Time for the Western Interconnection, unless circumstances warrant otherwise.	The Reliability Coordinator failed to share the results of its system studies, when conditions warranted or was requested, with other Reliability Coordinators and with Transmission Operators, Balancing Authorities, and Transmission Service Providers within its Reliability Coordinator Area for one (1) day during a calendar month.	The Reliability Coordinator failed to share the results of its system studies, when conditions warranted or was requested, with other Reliability Coordinators and with Transmission Operators, Balancing Authorities, and Transmission Service Providers within its Reliability Coordinator Area for two (2) to three (3) days during a calendar month.	The Reliability Coordinator failed to share the results of its system studies, when conditions warranted or was requested, with other Reliability Coordinators and with Transmission Operators, Balancing Authorities, and Transmission Service Providers within its Reliability Coordinator Area for four (4) to five (5) days during a calendar month.	The Reliability Coordinator failed to share the results of its system studies, when conditions warranted or was requested, with other Reliability Coordinators and with Transmission Operators, Balancing Authorities, and Transmission Service Providers within its Reliability Coordinator Area for more than five (5) days during a calendar month.
IRO-004-1	R6.	If the results of these studies indicate potential SOL or IROL violations, the Reliability Coordinator shall direct its Transmission Operators, Balancing Authorities and Transmission Service Providers to take any necessary action the Reliability Coordinator deems appropriate to address the potential SOL or IROL	N/A	N/A	N/A	The Reliability Coordinator failed to direct action to address a potential SOL or IROL violation when the results of its studies indicated a potential SOL or IROL violation.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		violation.				
IRO-004-1	R7.	Each Transmission Operator, Balancing Authority, and Transmission Service Provider shall comply with the directives of its Reliability Coordinator based on the next day assessments in the same manner in which it would comply during real time operating events.	N/A	N/A	N/A	The responsible entity failed to comply with the directive from its Reliability Coordinator based on the next day assessments in the same manner in which it would comply during real time operating events.
IRO-005-2	R2.	Each Reliability Coordinator shall be aware of all Interchange Transactions that wheel through, source, or sink in its Reliability Coordinator Area, and make that Interchange Transaction information available to all Reliability Coordinators in the Interconnection.	N/A	N/A	The Reliability Coordinator was aware of all Interchange Transactions that wheeled through, sourced, or sinked in its Reliability Coordinator Area, but failed to make that Interchange Transaction information available to all Reliability Coordinators in the Interconnection.	The Reliability Coordinator failed to be aware of all Interchange Transactions that wheeled through, sourced, or sinked in its Reliability Coordinator Area, and failed to make that Interchange Transaction information available to all Reliability Coordinators in the Interconnection.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
IRO-005-2	R3.	As portions of the transmission system approach or exceed SOLs or IROLs, the Reliability Coordinator shall work with its Transmission Operators and Balancing Authorities to evaluate and assess any additional Interchange Schedules that would violate those limits. If a potential or actual IROL violation cannot be avoided through proactive intervention, the Reliability Coordinator shall initiate control actions or emergency procedures to relieve the violation without delay, and no longer than 30 minutes. The Reliability Coordinator shall ensure all resources, including load shedding, are available to address a potential or actual IROL violation.	N/A	The Reliability Coordinator worked with its Transmission Operators and Balancing Authorities, as portions of the transmission system approached or exceeded SOLs or IROLs, to evaluate and assess any additional Interchange Schedules that would violate those limits and initiated control actions or emergency procedures to relieve the violation within 30 minutes, but failed to ensure all resources, including load shedding, were available to address a potential or actual IROL violation.	The Reliability Coordinator worked with its Transmission Operators and Balancing Authorities, as portions of the transmission system approached or exceeded SOLs or IROLs, to evaluate and assess any additional Interchange Schedules that would violate those limits and ensured all resources, including load shedding, were available to address a potential or actual IROL violation, but failed to initiate control actions or emergency procedures to relieve the violation within 30 minutes.	The Reliability Coordinator failed to work with its Transmission Operators and Balancing Authorities, as portions of the transmission system approached or exceeded SOLs or IROLs, to evaluate and assess any additional Interchange Schedules that would violate those limits and failed to initiate control actions or emergency procedures to relieve the violation within 30 minutes.
IRO-005-2	R4.	Each Reliability Coordinator shall monitor its Balancing Authorities' parameters to ensure that the	N/A	The Reliability Coordinator failed to direct the	The Reliability Coordinator failed to issue Energy	The Reliability Coordinator failed to monitor its

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		required amount of operating reserves is provided and available as required to meet the Control Performance Standard and Disturbance Control Standard requirements. If necessary, the Reliability Coordinator shall direct the Balancing Authorities in the Reliability Coordinator Area to arrange for assistance from neighboring Balancing Authorities. The Reliability Coordinator shall issue Energy Emergency Alerts as needed and at the request of its Balancing Authorities and Load-Serving Entities.		Balancing Authorities in the Reliability Coordinator Area to arrange for assistance from neighboring Balancing Authorities.	Emergency Alerts as needed and at the request of its Balancing Authorities and Load-Serving Entities.	Balancing Authorities' parameters to ensure that the required amount of operating reserves was provided and available as required to meet the Control Performance Standard and Disturbance Control Standard requirements.
IRO-005-2	R5.	Each Reliability Coordinator shall identify the cause of any potential or actual SOL or IROL violations. The Reliability Coordinator shall initiate the control action or emergency procedure to relieve the potential or actual IROL violation without delay, and no longer than 30 minutes. The Reliability Coordinator shall be able to utilize all resources, including load shedding, to address an IROL violation.	N/A	N/A	The Reliability Coordinator identified the cause of a potential or actual SOL or IROL violation, but failed to initiate a control action or emergency procedure to relieve the potential or actual IROL violation within 30 minutes.	The Reliability Coordinator failed to identify the cause of a potential or actual SOL or IROL violation and failed to initiate a control action or emergency procedure to relieve the potential or actual IROL violation.
IRO-005-2	R6.	Each Reliability Coordinator shall ensure its Transmission Operators	N/A	N/A	The Reliability Coordinator	The Reliability Coordinator failed

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		and Balancing Authorities are aware of Geo-Magnetic Disturbance (GMD) forecast information and assist as needed in the development of any required response plans.			ensured its Transmission Operators and Balancing Authorities were aware of Geo-Magnetic Disturbance (GMD) forecast information, but failed to assist, when needed, in the development of any required response plans.	to ensure its Transmission Operators and Balancing Authorities were aware of Geo-Magnetic Disturbance (GMD) forecast information.
IRO-005-2	R7.	The Reliability Coordinator shall disseminate information within its Reliability Coordinator Area, as required.	N/A	N/A	N/A	The Reliability Coordinator failed to disseminate information within its Reliability Coordinator Area, when required.
IRO-005-2	R10.	As necessary, the Reliability Coordinator shall assist the Balancing Authorities in its Reliability Coordinator Area in arranging for assistance from neighboring Reliability Coordinator Areas or Balancing Authorities.	N/A	N/A	N/A	The Reliability Coordinator failed to assist the Balancing Authorities in its Reliability Coordinator Area in arranging for assistance from neighboring

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						Reliability Coordinator Areas or Balancing Authorities, when necessary.
IRO-005-2	R11.	The Reliability Coordinator shall identify sources of large Area Control Errors that may be contributing to Frequency Error, Time Error, or Inadvertent Interchange and shall discuss corrective actions with the appropriate Balancing Authority. The Reliability Coordinator shall direct its Balancing Authority to comply with CPS and DCS.	N/A	The Reliability Coordinator identified sources of large Area Control Errors that were contributing to Frequency Error, Time Error, or Inadvertent Interchange and discussed corrective actions with the appropriate Balancing Authority but failed to direct the Balancing Authority to comply with CPS and DCS.	The Reliability Coordinator identified sources of large Area Control Errors that were contributing to Frequency Error, Time Error, or Inadvertent Interchange but failed to discuss corrective actions with the appropriate Balancing Authority.	The Reliability Coordinator failed to identify sources of large Area Control Errors that were contributing to Frequency Error, Time Error, or Inadvertent Interchange.
IRO-005-2	R12.	Whenever a Special Protection System that may have an inter-Balancing Authority, or inter-Transmission Operator impact (e.g., could potentially affect transmission flows resulting in a	N/A	N/A	N/A	The Reliability Coordinator failed to be aware of the impact on inter-area flows of an inter-Balancing

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		SOL or IROL violation) is armed, the Reliability Coordinators shall be aware of the impact of the operation of that Special Protection System on inter-area flows. The Transmission Operator shall immediately inform the Reliability Coordinator of the status of the Special Protection System including any degradation or potential failure to operate as expected.				Authority or inter-Transmission Operator, following the operation of a Special Protection System that was armed (e.g., could potentially affect transmission flows resulting in a SOL or IROL violation). OR The Transmission Operator failed to immediately inform the Reliability Coordinator of the status of the Special Protection System including any degradation or potential failure to operate as expected.
IRO-005-2	R13.	Each Reliability Coordinator shall ensure that all Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving	N/A	N/A	N/A	The Reliability Coordinator failed to ensure that all Transmission Operators,

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		Entities, and Purchasing-Selling Entities operate to prevent the likelihood that a disturbance, action, or non-action in its Reliability Coordinator Area will result in a SOL or IROL violation in another area of the Interconnection. In instances where there is a difference in derived limits, the Reliability Coordinator and its Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall always operate the Bulk Electric System to the most limiting parameter.				Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities operated to prevent the likelihood that a disturbance, action, or non-action in its Reliability Coordinator Area could result in a SOL or IROL violation in another area of the Interconnection. OR The responsible entity failed to operate the Bulk Electric System to the most limiting parameter in instances where there was a difference in derived limits.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
IRO-005-2	R14.	Each Reliability Coordinator shall make known to Transmission Service Providers within its Reliability Coordinator Area, SOLs or IROLs within its wide-area view. The Transmission Service Providers shall respect these SOLs or IROLs in accordance with filed tariffs and regional Total Transfer Calculation and Available Transfer Calculation processes.	N/A	N/A	N/A	The Reliability Coordinator failed to make known to Transmission Service Providers within its Reliability Coordinator Area, SOLs or IROLs within its wide-area view. OR The Transmission Service Providers failed to respect these SOLs or IROLs in accordance with filed tariffs and regional Total Transfer Calculation and Available Transfer Calculation processes.
IRO-005-2	R15.	Each Reliability Coordinator who foresees a transmission problem (such as an SOL or IROL violation, loss of reactive reserves, etc.) within its Reliability Coordinator Area shall issue an alert to all impacted Transmission	N/A	The Reliability Coordinator failed to notify all impacted Transmission Operators and Balancing	N/A	The Reliability Coordinator who foresaw a transmission problem (such as an SOL or IROL violation, loss of

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Operators and Balancing Authorities in its Reliability Coordinator Area without delay. The receiving Reliability Coordinator shall disseminate this information to its impacted Transmission Operators and Balancing Authorities. The Reliability Coordinator shall notify all impacted Transmission Operators, Balancing Authorities, when the transmission problem has been mitigated.		Authorities, when the transmission problem had been mitigated.		reactive reserves, etc.) within its Reliability Coordinator Area failed to issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area. OR The receiving Reliability Coordinator failed to disseminate this information to its impacted Transmission Operators and Balancing Authorities.
IRO-005-2	R16.	Each Reliability Coordinator shall confirm reliability assessment results and determine the effects within its own and adjacent Reliability Coordinator Areas. The Reliability Coordinator shall discuss options to mitigate potential or actual SOL or IROL	N/A	N/A	The Reliability Coordinator confirmed the reliability assessment results and determined the effects within its own and adjacent	The Reliability Coordinator failed to confirm reliability assessment results and determine the effects within its own and adjacent

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		violations and take actions as necessary to always act in the best interests of the Interconnection at all times.			Reliability Coordinator Areas and discussed options to mitigate potential or actual SOL or IROL violations, **but** failed to take actions as necessary to always act in the best interests of the Interconnection at all times.	Reliability Coordinator Areas. OR The Reliability Coordinator failed to discuss options to mitigate potential or actual SOL or IROL violations and take actions as necessary to always act in the best interests of the Interconnection at all times.
IRO-005-2	R17.	When an IROL or SOL is exceeded, the Reliability Coordinator shall evaluate the local and wide-area impacts, both real-time and post-contingency, and determine if the actions being taken are appropriate and sufficient to return the system to within IROL in thirty minutes. If the actions being taken are not appropriate or sufficient, the Reliability Coordinator shall direct the Transmission Operator, Balancing Authority, Generator Operator, or Load-Serving Entity	N/A	N/A	N/A	The Reliability Coordinator either failed to evaluate the local and wide-area impacts of an IROL or SOL that was exceeded, in either real-time or post-contingency. OR The Reliability Coordinator evaluated the local and wide-area impacts of an

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		to return the system to within IROL or SOL.				IROL or SOL that was exceeded, both real-time and post-contingency, and determined that the actions being taken were not appropriate and sufficient to return the system to within IROL in thirty (30) minutes, but failed to direct the Transmission Operator, Balancing Authority, Generator Operator, or Load-Serving Entity to return the system to within IROL or SOL.
IRO-006-4.1	R2	The Reliability Coordinator shall only use local transmission loading relief or congestion management procedures to which the Transmission Operator experiencing the potential or actual SOL or IROL violation is a party.	N/A	N/A	N/A	A Reliability Coordinator implemented local transmission loading relief or congestion management procedures to relieve congestion

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						but the Transmission Operator experiencing the congestion was not a party to those procedure
IRO-006-4.1	R3.	Each Reliability Coordinator with a relief obligation from an Interconnection-wide procedure shall follow the curtailments as directed by the Interconnection-wide procedure. A Reliability Coordinator desiring to use a local procedure as a substitute for curtailments as directed by the Interconnection-wide procedure shall obtain prior approval of the local procedure from the ERO.	N/A	N/A	N/A	A Reliability Coordinator implemented local transmission loading relief or congestion management procedures as a substitute for curtailment as directed by the Interconnection-wide procedure but the local procedure had not received prior approval from the ERO
IRO-014-1	R1.	The Reliability Coordinator shall have Operating Procedures, Processes, or Plans in place for activities that require notification, exchange of information or coordination of actions with one or more other Reliability	N/A	N/A	The Reliability Coordinator has Operating Procedures, Processes, or Plans in place for activities that	The Reliability Coordinator failed to have Operating Procedures, Processes, or Plans in place for activities that

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Coordinators to support Interconnection reliability. These Operating Procedures, Processes, or Plans shall address Scenarios that affect other Reliability Coordinator Areas as well as those developed in coordination with other Reliability Coordinators.			require notification, exchange of information or coordination of actions with one or more other Reliability Coordinators to support Interconnection reliability, but failed to address Scenarios that affect other Reliability Coordinator Areas.	require notification, exchange of information or coordination of actions with one or more other Reliability Coordinators to support Interconnection reliability.
IRO-014-1	R1.1.	These Operating Procedures, Processes, or Plans shall collectively address, as a minimum, the following:	N/A	The Reliability Coordinator failed to include one of the elements listed in IRO-014-1 R1.1.1 through R1.1.6 in its Operating Procedures, Processes, or Plans.	The Reliability Coordinator failed to include two of the elements listed in IRO-014-1 R1.1.1 through R1.1.6 in its Operating Procedures, Processes, or Plans.	The Reliability Coordinator failed to include more than two of the elements listed in IRO-014-1 R1.1.1 through R1.1.6 in its Operating Procedures, Processes, or Plans.
IRO-014-1	R1.1.1.	Communications and notifications, including the conditions under which one Reliability Coordinator notifies other Reliability Coordinators; the process to follow	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		in making those notifications; and the data and information to be exchanged with other Reliability Coordinators.				
IRO-014-1	R1.1.2.	Energy and capacity shortages.	N/A	N/A	N/A	N/A
IRO-014-1	R1.1.3.	Planned or unplanned outage information.	N/A	N/A	N/A	N/A
IRO-014-1	R1.1.4.	Voltage control, including the coordination of reactive resources for voltage control.	N/A	N/A	N/A	N/A
IRO-014-1	R1.1.5.	Coordination of information exchange to support reliability assessments.	N/A	N/A	N/A	N/A
IRO-014-1	R1.1.6.	Authority to act to prevent and mitigate instances of causing Adverse Reliability Impacts to other Reliability Coordinator Areas.	N/A	N/A	N/A	N/A
IRO-014-1	R4.	Each of the Operating Procedures, Processes, and Plans addressed in Reliability Standard IRO-014 Requirement 1 and Requirement 3 shall:	N/A	The Operating Procedures, Processes and Plans did not include **one** of the elements listed in IRO-014-1 R4.1 through R4.3.	The Operating Procedures, Processes and Plans did not include **two** of the elements listed in IRO-014-1 R4.1 through R4.3.	The Operating Procedures, Processes and Plans did not include **any** of the elements listed in IRO-014-1 R4.1 through R4.3.
IRO-014-1	R4.1.	Include version control number or date	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
IRO-014-1	R4.2.	Include a distribution list.	N/A	N/A	N/A	N/A
IRO-014-1	R4.3.	Be reviewed, at least once every three years, and updated if needed.	N/A	N/A	N/A	N/A
IRO-015-1	R3.	The Reliability Coordinator shall provide reliability-related information as requested by other Reliability Coordinators.				The Reliability Coordinator failed to provide reliability-related information as requested by other Reliability Coordinators.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
MOD-006-0.1	R1.	Each Transmission Service Provider shall document its procedure on the use of Capacity Benefit Margin (CBM) (scheduling of energy against a CBM reservation). The procedure shall include the following three components:	The responsible entity documented its procedure on the use of Capacity Benefit Margin (CBM) but failed to include one (1) of the components as specified in R1.1, R1.2 or R1.3.	The responsible entity documented its procedure on the use of Capacity Benefit Margin (CBM) but failed to include two (2) of the components as specified in R1.1, R1.2 or R1.3.	The responsible entity documented its procedure on the use of Capacity Benefit Margin (CBM) but failed to include three (3) of the components as specified in R1.1, R1.2 and R1.3.	The responsible entity failed to document its procedure on the use of Capacity Benefit Margin (CBM).
MOD-006-0.1	R1.1.	Require that CBM be used only after the following steps have been taken (as time permits): all non-firm sales have been terminated, Direct-Control Load Management has been implemented, and customer interruptible demands have been interrupted. CBM may be used to reestablish Operating Reserves.	N/A	N/A	N/A	N/A
MOD-006-0.1	R1.2.	Require that CBM shall only be used if the Load-Serving	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Entity calling for its use is experiencing a generation deficiency and its Transmission Service Provider is also experiencing Transmission Constraints relative to imports of energy on its transmission system.				
MOD-006-0.1	R1.3.	Describe the conditions under which CBM may be available as Non-Firm Transmission Service.	N/A	N/A	N/A	N/A
MOD-007-0	R1.	Each Transmission Service Provider that uses CBM shall report (to the Regional Reliability Organization, NERC and the transmission users) the use of CBM by the Load-Serving Entities' Loads on its system, except for CBM sales as Non-Firm Transmission Service. (This use of CBM shall be	N/A	The responsible entity uses CBM and failed to report the use of CBM to one (1) of the following: Regional Reliability Organization, NERC or transmission users.	The responsible entity uses CBM and failed to report the use of CBM to two (2) of the following: Regional Reliability Organization, NERC or transmission users.	The responsible entity uses CBM and failed to report the use of CBM to all of the following: Regional Reliability Organization, NERC and transmission users.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		consistent with the Transmission Service Provider's procedure for use of CBM.)				
MOD-016-1.1	R1.	The Planning Authority and Regional Reliability Organization shall have documentation identifying the scope and details of the actual and forecast (a) Demand data, (b) Net Energy for Load data, and (c) controllable DSM data to be reported for system modeling and reliability analyses.	N/A	The responsible entity did not have documentation identifying the scope and details of the actual and forecast data for one (1) of the following types of data to be reported for system modeling and reliability analyses: • Demand data • Net Energy for Load data • Controllable DSM data	The responsible entity did not have documentation identifying the scope and details of the actual and forecast data for two (2) of the following to be reported for system modeling and reliability analyses: • Demand data • Net Energy for Load data • Controllable DSM data	The responsible entity did not have documentation identifying the scope and details of the actual and forecast data to be reported for system modeling and reliability analyses.
MOD-016-1.1	R1.1.	The aggregated and dispersed data submittal requirements shall ensure that consistent data is supplied for Reliability Standards TPL-005, TPL-006, MOD-010, MOD-011, MOD-012,	The responsible entity failed to ensure that consistent data is supplied for one of the Reliability Standards as specified in R1.1.	The responsible entity failed to ensure that consistent data is supplied for two of the Reliability Standards as specified in R1.1.	The responsible entity failed to ensure that consistent data is supplied for three of the Reliability Standards as specified in R1.1.	The responsible entity failed to ensure that consistent data is supplied for four or more of the Reliability Standards as specified in R1.1. OR The responsible entity failed to

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		MOD-013, MOD-014, MOD-015, MOD-016, MOD-017, MOD-018, MOD-019, MOD-020, and MOD-021. The data submittal requirements shall stipulate that each Load-Serving Entity count its customer Demand once and only once, on an aggregated and dispersed basis, in developing its actual and forecast customer Demand values.				stipulate that each Load-Serving Entity count its customer Demand once and only once, on an aggregated and dispersed basis, in developing its actual and forecast customer Demand values.
MOD-016-1.1	R3.	The Planning Authority shall distribute its documentation required in R1 for reporting customer data and any changes to that documentation, to its Transmission Planners and Load-Serving Entities that work within its Planning Authority Area.	The responsible entity failed to distribute its documentation required in Requirement R1 and any changes to that documentation to 5% or less of all Transmission Planners and Load-Serving Entities that work within its Region. OR	The responsible entity failed to distribute its documentation required in Requirement R1 and any changes to that documentation to more than 5% up to (and including) 10% of all Transmission Planners and Load-Serving Entities that work within its Region.	The responsible entity failed to distribute its documentation required in Requirement R1 and any changes to that documentation to more than 10% up to (and including) 15% of all Transmission Planners and Load-Serving Entities that work within its Region.	The responsible entity failed to distribute its documentation as specified in Requirement R1 to more than 15% of all Transmission Planners and Load-Serving Entities that work within its Region. OR The responsible entity failed to make

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			The responsible entity distributed the documentation more than 30 calendar days but less than or equal to 40 calendar days following approval.	OR The responsible entity made the distribution more than 40 calendar days but less than or equal to 50 calendar days following approval.	OR The responsible entity made the distribution more than 50 calendar days but less than or equal to 60 calendar days following approval.	the distribution more than 60 calendar days following approval.
MOD-016-1.1	R3.1.	The Planning Authority shall make this distribution within 30 calendar days of approval.	N/A	N/A	N/A	N/A
MOD-017-0.1	R1.	The Load-Serving Entity, Planning Authority, and Resource Planner shall each provide the following information annually on an aggregated Regional, subregional, Power Pool, individual system, or Load-Serving Entity basis to NERC, the Regional Reliability Organizations, and any other entities specified by the documentation in Standard MOD-016-	The responsible entity failed to provide one (1) of the elements of information as specified in R1.1, R1.2, R1.3 or R1.4 on an annual basis.	The responsible entity failed to provide two (2) of the elements of information as specified in R1.1, R1.2, R1.3 or R1.4 on an annual basis.	The responsible entity failed to provide three (3) of the elements of information as specified in R1.1, R1.2, R1.3 or R1.4 on an annual basis.	The responsible entity failed to provide all of the elements of information as specified in R1.1, R1.2, R1.3 and R1.4 on an annual basis.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		1_R1.				
MOD-017-0.1	R1.1.	Integrated hourly demands in megawatts (MW) for the prior year.	N/A	N/A	N/A	N/A
MOD-017-0.1	R1.2.	Monthly and annual peak hour actual demands in MW and Net Energy for Load in gigawatthours (GWh) for the prior year.	N/A	N/A	N/A	N/A
MOD-017-0.1	R1.3.	Monthly peak hour forecast demands in MW and Net Energy for Load in GWh for the next two years.	N/A	N/A	N/A	N/A
MOD-017-0.1	R1.4.	Annual Peak hour forecast demands (summer and winter) in MW and annual Net Energy for load in GWh for at least five years and up to ten years into the future, as requested.	N/A	N/A	N/A	N/A
MOD-018-0	R1.	The Load-Serving Entity, Planning Authority, Transmission Planner and Resource Planner's report of actual and	N/A	The responsible entity's report failed to include one (1) of the items as specified in R1.1, R1.2, or R1.3.	The responsible entity's report failed to include two (2) of the items as specified in R1.1, R1.2, or R1.3.	The responsible entity's report failed to include any of the items as specified in R1.1, R1.2, and R1.3.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		forecast demand data (reported on either an aggregated or dispersed basis) shall:				
MOD-018-0	R1.1.	Indicate whether the demand data of nonmember entities within an area or Regional Reliability Organization are included, and	N/A	N/A	N/A	N/A
MOD-018-0	R1.2.	Address assumptions, methods, and the manner in which uncertainties are treated in the forecasts of aggregated peak demands and Net Energy for Load.	N/A	N/A	N/A	N/A
MOD-018-0	R1.3.	Items (MOD-018-0_R 1.1) and (MOD-018-0_R 1.2) shall be addressed as described in the reporting procedures developed for Standard MOD-016-1_R1.	N/A	N/A	N/A	N/A
MOD-021-0.1	R1.	The Load-Serving Entity, Transmission	The responsible entity's forecasts	The responsible entity's forecasts	The responsible entity's forecasts	The responsible entity's forecasts

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Planner, and Resource Planner's forecasts shall each clearly document how the Demand and energy effects of DSM programs (such as conservation, time-of-use rates, interruptible Demands, and Direct Control Load Management) are addressed.	document how the Demand and energy effects of DSM programs but failed to document how one (1) of the following elements of the Demand and energy effects of DSM programs are addressed: conservation, time-of-use rates, interruptible Demands or Direct Control Load Management.	document how the Demand and energy effects of DSM programs but failed to document how two (2) of the following elements of the Demand and energy effects of DSM programs are addressed: conservation, time-of-use rates, interruptible Demands or Direct Control Load Management.	document how the Demand and energy effects of DSM programs but failed to document how three (3) of the following elements of the Demand and energy effects of DSM programs are addressed: conservation, time-of-use rates, interruptible Demands or Direct Control Load Management.	failed to document how the Demand and energy effects of DSM programs are addressed.
MOD-021-0.1	R2.	The Load-Serving Entity, Transmission Planner, and Resource Planner shall each include information detailing how Demand-Side Management measures are addressed in the forecasts of its Peak Demand and annual Net Energy for Load in the data reporting procedures of Standard MOD-016-0_R1.	N/A	N/A	N/A	The responsible entity failed to include information detailing how Demand-Side Management measure(s) are addressed in the forecasts of its Peak Demand and annual Net Energy for Load in the data reporting procedures of Standard MOD-016-0_R 1.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
NUC-001-2	R1.	The Nuclear Plant Generator Operator shall provide the proposed NPIRs in writing to the applicable Transmission Entities and shall verify receipt.	The Nuclear Plant Generator Operator provided the NPIR's to the applicable entities but did not verify receipt.	The Nuclear Plant Generator Operator did not provide the proposed NPIR to one of the applicable entities.	The Nuclear Plant Generator Operator did not provide the proposed NPIR's to two of the applicable entities.	The Nuclear Plant Generator Operator did not provide the proposed NPIR's to more than two of applicable entities.
NUC-001-2	R2.	The Nuclear Plant Generator Operator and the applicable Transmission Entities shall have in effect one or more Agreements that include mutually agreed to NPIRs and document how the Nuclear Plant Generator Operator and the applicable Transmission Entities shall address and implement these NPIRs.	N/A	N/A	N/A	The Nuclear Plant Generator Operator or the applicable Transmission Entity does not have in effect one or more agreements that include mutually agreed to NPIRs and document the implementation of the NPIRs.
NUC-001-2	R3.	Per the Agreements developed in accordance with this standard, the applicable Transmission Entities shall	N/A	The responsible entity incorporated the NPIRs into its planning analyses but did not communicate the results to the	N/A	The responsible entity did not incorporate the NPIRs into its planning analyses of the electric system.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		incorporate the NPIRs into their planning analyses of the electric system and shall communicate the results of these analyses to the Nuclear Plant Generator Operator.		Nuclear Plant Generator Operator.		
NUC-001-2	R5.	The Nuclear Plant Generator Operator shall operate per the Agreements developed in accordance with this standard.	N/A	N/A	N/A	The Nuclear Plant Generator Operator failed to operate per the Agreements developed in accordance with this standard.
NUC-001-2	R9.	The Nuclear Plant Generator Operator and the applicable Transmission Entities shall include, as a minimum, the following elements within the agreement(s) identified in R2:	The agreement identified in R2. between the Nuclear Plant Generator Operator and the applicable Transmission Entities is missing one or more sub-components of R9.1.	The agreement identified in R2. between the Nuclear Plant Generator Operator and the applicable Transmission Entities is missing from one to five of the combined sub-components in R9.2, R9.3 and R9.4.	The agreement identified in R2. between the Nuclear Plant Generator Operator and the applicable Transmission Entities is missing from six to ten of the combined sub-components in R9.2, R9.3 and R9.4.	The agreement identified in R2. between the Nuclear Plant Generator Operator and the applicable Transmission Entities is missing eleven or more of the combined sub-components in R9.2, R9.3 and R9.4.
NUC-001-2	R9.1	Administrative elements:	N/A	N/A	N/A	N/A
NUC-001-2	R9.1.1	Definitions of key terms used in the	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		agreement.				
NUC-001-2	R9.1.2	Names of the responsible entities, organizational relationships, and responsibilities related to the NPIRs.	N/A	N/A	N/A	N/A
NUC-001-2	R9.1.3	A requirement to review the agreement(s) at least every three years.	N/A	N/A	N/A	N/A
NUC-001-2	R9.1.4	A dispute resolution mechanism.	N/A	N/A	N/A	N/A
NUC-001-2	R9.2	Technical requirements and analysis:	N/A	N/A	N/A	N/A
NUC-001-2	R9.2.1	Identification of parameters, limits, configurations, and operating scenarios included in the NPIRs and, as applicable, procedures for providing any specific data not provided within the agreement.	N/A	N/A	N/A	N/A
NUC-001-2	R9.2.2	Identification of facilities, components, and configuration	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		restrictions that are essential for meeting the NPIRs.				
NUC-001-2	R9.2.3	Types of planning and operational analyses performed specifically to support the NPIRs, including the frequency of studies and types of Contingencies and scenarios required.	N/A	N/A	N/A	N/A
NUC-001-2	R9.3	Operations and maintenance coordination:	N/A	N/A	N/A	N/A
NUC-001-2	R9.3.1	Designation of ownership of electrical facilities at the interface between the electric system and the nuclear plant and responsibilities for operational control coordination and maintenance of these facilities.	N/A	N/A	N/A	N/A
NUC-001-2	R9.3.2	Identification of any maintenance requirements for equipment not owned or controlled	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		by the Nuclear Plant Generator Operator that are necessary to meet the NPIRs.				
NUC-001-2	R9.3.3	Coordination of testing, calibration and maintenance of on-site and off-site power supply systems and related components.	N/A	N/A	N/A	N/A
NUC-001-2	R9.3.4	Provisions to address mitigating actions needed to avoid violating NPIRs and to address periods when responsible Transmission Entity loses the ability to assess the capability of the electric system to meet the NPIRs. These provisions shall include responsibility to notify the Nuclear Plant Generator Operator within a specified time frame.	N/A	N/A	N/A	N/A
NUC-001-2	R9.3.5	Provision for considering, within the restoration process, the	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		requirements and urgency of a nuclear plant that has lost all off-site and on-site AC power.				
NUC-001-2	R9.3.6	Coordination of physical and cyber security protection of the Bulk Electric System at the nuclear plant interface to ensure each asset is covered under at least one entity's plan.	N/A	N/A	N/A	N/A
NUC-001-2	R9.3.7	Coordination of the NPIRs with transmission system Special Protection Systems and underfrequency and undervoltage load shedding programs.	N/A	N/A	N/A	N/A
NUC-001-2	R9.4	Communications and training:	N/A	N/A	N/A	N/A
NUC-001-2	R9.4.1	Provisions for communications between the Nuclear Plant Generator Operator and Transmission Entities, including	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		communications protocols, notification time requirements, and definitions of terms.				
NUC-001-2	R9.4.2	Provisions for coordination during an off-normal or emergency event affecting the NPIRs, including the need to provide timely information explaining the event, an estimate of when the system will be returned to a normal state, and the actual time the system is returned to normal.	N/A	N/A	N/A	N/A
NUC-001-2	R9.4.3	Provisions for coordinating investigations of causes of unplanned events affecting the NPIRs and developing solutions to minimize future risk of such events.	N/A	N/A	N/A	N/A
NUC-001-2	R9.4.4	Provisions for supplying information necessary to report to government	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (NUC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		agencies, as related to NPIRs.				
NUC-001-2	R9.4.5	Provisions for personnel training, as related to NPIRs.	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (PER)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
PER-001-0.1	R1.	Each Transmission Operator and Balancing Authority shall provide operating personnel with the responsibility and authority to implement real-time actions to ensure the stable and reliable operation of the Bulk Electric System.	N/A	N/A	The Transmission Operator or Balancing Authority failed to demonstrate that it communicated to its operating personnel their responsibility or their authority to implement real-time actions to ensure the stable and reliable operation of the Bulk Electric System.	The Transmission Operator or Balancing Authority failed to demonstrate that it communicated to its operating personnel their responsibility and authority to implement real-time actions to ensure the stable and reliable operation of the Bulk Electric System.
PER-002-0	R1.	Each Transmission Operator and Balancing Authority shall be staffed with adequately trained operating personnel.	The responsible entity failed to staff 5% or less with adequately trained operating personnel.	The responsible failed to staff more than 5% up to (and including) 10% with adequately trained operating personnel.	The responsible entity failed to staff more than 10% up to (and including) 15% with adequately trained operating personnel.	The responsible entity failed to staff more than 15% with adequately trained operating personnel.
PER-002-0	R2.	Each Transmission Operator and Balancing Authority shall have a training program for all operating personnel that are in:	The responsible entity did not train operating personnel for positions described in R2.1 or R2.2, affecting 5% or less of its operating personnel.	The responsible entity did not train operating personnel for positions described in R2.1 or R2.2, affecting more than 5% up to (and including) 10% of its operating personnel.	The responsible entity did not train operating personnel for positions described in R2.1 or R2.2, affecting more than 10% up to (and including) 15% of its operating personnel.	The responsible entity did not train operating personnel for positions described in R2.1 or R2.2, affecting more than 15% of its operating personnel.
PER-002-0	R2.1.	Positions that have	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (PER)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.				
PER-002-0	R2.2.	Positions directly responsible for complying with NERC standards.	N/A	N/A	N/A	N/A
PER-002-0	R4.	For personnel identified in Requirement R2, each Transmission Operator and Balancing Authority shall provide its operating personnel at least five days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.	The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting 5% or less of its operating personnel.	The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting more than 5% up to (and including) 10% of its operating personnel.	The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting more than 10% up to (and including) 15% of its operating personnel.	The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting more than 15% of its operating personnel.
PER-003-0	R1.	Each Transmission Operator, Balancing Authority, and Reliability	N/A	N/A	N/A	The responsible entity did not staff all of its operating positions with

Violation Severity Level Matrix (PER)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Coordinator shall staff all operating positions that meet both of the following criteria with personnel that are NERC-certified for the applicable functions:				personnel that are NERC-certified as required by the criteria described in R1.1 and R1.2.
PER-003-0	R1.1.	Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.	N/A	N/A	N/A	N/A
PER-003-0	R1.2.	Positions directly responsible for complying with NERC standards.	N/A	N/A	N/A	N/A
PER-004-1	R1.	Each Reliability Coordinator shall be staffed with adequately trained and NERC-certified Reliability Coordinator operators, 24 hours per day, seven days per week.	N/A	N/A	N/A	The responsible entity has failed to be staffed with adequately trained and NERC-certified Reliability Coordinator operators, 24 hours per day, seven days per week.

Violation Severity Level Matrix (PER)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
PER-004-1	R2.	All Reliability Coordinator operating personnel shall each complete a minimum of five days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.	The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting 5% or less of its operating personnel.	The responsible entity did not provide five days per year of training and drills, as directed by the requirement, more than 5% up to (and including) 10% of its operating personnel.	The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting more than 10% up to (and including) 15% of its operating personnel.	The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting more than 15% of its operating personnel.
PER-004-1	R3.	Reliability Coordinator operating personnel shall have a comprehensive understanding of the Reliability Coordinator Area and interactions with neighboring Reliability Coordinator Areas.	5% or less of the Reliability Coordinator operating personnel did not have a comprehensive understanding of the Reliability Coordinator Area and interactions with neighboring Reliability Coordinator Areas.	More than 5% up to (and including) 10% of the Reliability Coordinator operating personnel did not have a comprehensive understanding of the Reliability Coordinator Area and interactions with neighboring Reliability Coordinator Areas.	More than 10% up to (and including) 15% of the Reliability Coordinator operating personnel did not have a comprehensive understanding of the Reliability Coordinator Area and interactions with neighboring Reliability Coordinator Areas.	More than 15% of the Reliability Coordinator operating personnel did not have a comprehensive understanding of the Reliability Coordinator Area and interactions with neighboring Reliability Coordinator Areas.
PER-004-1	R4.	Reliability Coordinator operating personnel shall have an extensive understanding of the	5% or less of the Reliability Coordinator operating personnel did not have an extensive	More than 5% up to (and including) 10% of the Reliability Coordinator operating personnel did not have an	More than 10% up to (and including) 15% of the Reliability Coordinator operating personnel did not have an	More than 15% of the Reliability Coordinator operating personnel did not have an extensive

Violation Severity Level Matrix (PER)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Balancing Authorities, Transmission Operators, and Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions.	understanding of the Balancing Authorities, Transmission Operators, and Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions.	extensive understanding of the Balancing Authorities, Transmission Operators, and Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions.	extensive understanding of the Balancing Authorities, Transmission Operators, and Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions.	understanding of the Balancing Authorities, Transmission Operators, and Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions.

Violation Severity Level Matrix (PRC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
PRC-001-1	R1.	Each Transmission Operator, Balancing Authority, and Generator Operator shall be familiar with the purpose and limitations of protection system schemes applied in its area.	N/A	N/A	The responsible failed to be familiar with the purpose of protection system schemes applied in its area. OR The responsible entity failed to be familiar with the limitations of protection system schemes applied in its area.	The responsible entity failed to be familiar with the purpose and limitations of protection system schemes applied in its area.
PRC-001-1	R3.	A Generator Operator or Transmission Operator shall coordinate new protective systems and changes as follows.	N/A	N/A	N/A	N/A
PRC-001-1	R3.1.	Each Generator Operator shall coordinate all new protective systems and all protective system changes with its Transmission Operator and Host	The Generator Operator failed to coordinate one new protective system or one protective system change with either its Transmission	The Generator Operator failed to coordinate two new protective systems or two protective system changes with either its Transmission	The Generator Operator failed to coordinate three new protective systems or three protective system changes with either its Transmission	The Generator Operator failed to coordinate more than three new protective systems or more than three changes with its Transmission

Violation Severity Level Matrix (PRC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Balancing Authority.	Operator or its Host Balancing Authority or both.	Operator or its Host Balancing Authority, or both.	Operator or its Host Balancing Authority, or both.	Operator and Host Balancing Authority.
PRC-001-1	R3.2.	Each Transmission Operator shall coordinate all new protective systems and all protective system changes with neighboring Transmission Operators and Balancing Authorities.	The Transmission Operator failed to coordinate one new protective system or one protective system change with either its Transmission Operator or its Host Balancing Authority or both.	The Transmission Operator failed to coordinate two new protective systems or two protective system changes with either its Transmission Operator or its Host Balancing Authority, or both.	The Transmission Operator failed to coordinate three new protective systems or three protective system changes with either its Transmission Operator or its Host Balancing Authority, or both.	The Transmission Operator failed to coordinate more than three new protective systems or more than three system changes with neighboring Transmission Operators and Balancing Authorities.
PRC-001-1	R5.	A Generator Operator or Transmission Operator shall coordinate changes in generation, transmission, load or operating conditions that could require changes in the protection systems of others:	N/A	N/A	The Generator Operator failed to notify its Transmission Operator at all of changes in generation or operating conditions that could require changes in the Transmission Operator's protection systems. (R5.1) OR The Transmission Operator failed to notify neighboring Transmission	The Generator Operator failed to notify its Transmission Operator at all of changes in generation or operating conditions that could require changes in the Transmission Operator's protection systems. (R5.1) AND The Transmission Operator failed to notify neighboring Transmission

Violation Severity Level Matrix (PRC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					Operators at all of changes in generation, transmission, load, or operating conditions that could require changes in the other Transmission Operators' protection systems. (R5.2)	Operators at all of changes in generation, transmission, load, or operating conditions that could require changes in the other Transmission Operators' protection systems. (R5.2)
PRC-001-1	R5.1.	Each Generator Operator shall notify its Transmission Operator in advance of changes in generation or operating conditions that could require changes in the Transmission Operator's protection systems.	N/A	N/A	N/A	N/A
PRC-001-1	R5.2.	Each Transmission Operator shall notify neighboring Transmission Operators in advance of changes in generation, transmission, load, or operating conditions that could require changes in	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (PRC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		the other Transmission Operators' protection systems.				
PRC-001-1	R6.	Each Transmission Operator and Balancing Authority shall monitor the status of each Special Protection System in their area, and shall notify affected Transmission Operators and Balancing Authorities of each change in status.	N/A	N/A	The responsible entity monitored the status of each Special Protection System in its area but notification of a change in status of a Special Protection System was not made to the affected Transmission Operators and Balancing Authorities.	The responsible entity failed to monitor the status of each Special Protection System in its area, and did not notify affected Transmission Operators and Balancing Authorities of each change in status.
PRC-004-1	R1.	The Transmission Owner and any Distribution Provider that owns a transmission Protection System shall each analyze its transmission Protection System Misoperations and shall develop and implement a Corrective Action Plan to avoid future Misoperations of a similar nature according to the	N/A	The responsible entity provided evidence of analyzing a Misoperation but the documentation and implementation of the associated Corrective Action Plan was not provided.	N/A	The responsible entity did not perform an analysis of a Misoperation.

Violation Severity Level Matrix (PRC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Regional Reliability Organization's procedures developed for Reliability Standard PRC-003 Requirement 1.				
PRC-004-1	R2.	The Generator Owner shall analyze its generator Protection System Misoperations, and shall develop and implement a Corrective Action Plan to avoid future Misoperations of a similar nature according to the Regional Reliability Organization's procedures developed for PRC-003 R1.	N/A	The Generator Owner provided evidence of analyzing a Misoperation but the documentation and implementation of the associated Corrective Action Plan was not provided.	N/A	The Generator Owner did not perform an analysis of a Misoperation.
PRC-004-1	R3.	The Transmission Owner, any Distribution Provider that owns a transmission Protection System, and the Generator Owner shall each provide to its Regional Reliability Organization,	The responsible entity provided its Regional Reliability Organization with documentation of its Misoperations analyses and its Corrective Action Plans, but did not provide these according to the	N/A	The responsible entity provided its Regional Reliability Organization with documentation of its Misoperations analyses but did not provide its Corrective Action Plans.	The responsible entity did not provide its Regional Reliability Organization with documentation of its Misoperations analyses and did not provide its Corrective Action

Violation Severity Level Matrix (PRC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		documentation of its Misoperations analyses and Corrective Action Plans according to the Regional Reliability Organization's procedures developed for PRC-003 R1.	Regional Reliability Organization's procedures.			Plans.
PRC-005-1	R1.	Each Transmission Owner and any Distribution Provider that owns a transmission Protection System and each Generator Owner that owns a generation Protection System shall have a Protection System maintenance and testing program for Protection Systems that affect the reliability of the BES. The program shall include:	The responsible entity failed to have a basis for the maintenance and testing intervals in their program for one of the applicable Protection Systems (protective relays, associated communication systems, current sensing devices, batteries and DC control circuitry per NERC Glossary of Terms) that affect the reliability of the BES. OR Summary of maintenance and testing procedures were missing for one	The responsible entity failed to have a basis for the maintenance and testing intervals in their program for two of the applicable Protection Systems (protective relays, associated communication systems, current sensing devices, batteries and DC control circuitry per NERC Glossary of Terms) that affect the reliability of the BES.	The responsible entity failed to have a basis for the maintenance and testing intervals in their program for three of the applicable Protection Systems (protective relays, associated communication systems, current sensing devices, batteries and DC control circuitry per NERC Glossary of Terms) that affect the reliability of the BES.	The responsible entity-failed to have Protection System maintenance and testing program.

Violation Severity Level Matrix (PRC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			of the applicable Protection Systems. (R1.1, R1.2)			
PRC-005-1	R1.1.	Maintenance and testing intervals and their basis.	N/A	N/A	N/A	N/A
PRC-005-1	R1.2.	Summary of maintenance and testing procedures.	N/A	N/A	N/A	N/A
PRC-005-1	R2.	Each Transmission Owner and any Distribution Provider that owns a transmission Protection System and each Generator Owner that owns a generation Protection System shall provide documentation of its Protection System maintenance and testing program and the implementation of that program to its Regional Reliability Organization on request (within 30 calendar days). The documentation of the program implementation shall include:	The responsible entity provided documentation of its Protection System maintenance and testing program more than 30 calendar days following a request from its Regional Reliability Organization and/or NERC. OR Evidence Protection System devices were maintained and tested within the defined intervals (R2.1 and R2.2) was missing 5% or less of the applicable devices.	Evidence Protection System devices were maintained and tested within the defined intervals (R2.1 and R2.2) was missing more than 5% up to (and including) 10% of the applicable devices.	Evidence Protection System devices were maintained and tested within the defined intervals (R2.1 and R2.2) was missing more than 10% up to (and including) 15% of the applicable devices.	Evidence Protection System devices were maintained and tested within the defined intervals (R2.1 and R2.2) was missing more than 15% of the applicable devices.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
PRC-005-1	R2.1.	Evidence Protection System devices were maintained and tested within the defined intervals.	N/A	N/A	N/A	N/A
PRC-005-1	R2.2.	Date each Protection System device was last tested/maintained.	N/A	N/A	N/A	N/A
PRC-007-0	R1.	The Transmission Owner and Distribution Provider with a UFLS program (as required by its Regional Reliability Organization) shall ensure that its UFLS program is consistent with its Regional Reliability Organization's UFLS program requirements.	The evaluation of the entity's UFLS program for consistency with its Regional Reliability Organization's UFLS program is incomplete or inconsistent in one or more of the Regional Reliability Organization program requirements, but is consistent with the required amount of load shedding.	The amount of load shedding is less than 95 percent of the Regional requirement in any of the load steps.	The amount of load shedding is less than 90 percent of the Regional requirement in any of the load steps.	The amount of load shedding is less than 85 percent of the Regional requirement in any of the load steps.
PRC-007-0	R2.	The Transmission Owner, Transmission Operator, Distribution Provider, and Load-Serving Entity that owns or operates a	The responsible entity that owns or operates a UFLS program (as required by its Regional Reliability Organization) provided its	The responsible entity that owns or operates a UFLS program (as required by its Regional Reliability Organization) provided its	The responsible entity that owns or operates a UFLS program (as required by its Regional Reliability Organization) provided its	The responsible entity that owns or operates a UFLS program (as required by its Regional Reliability Organization) did not provided its

Violation Severity Level Matrix (PRC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		UFLS program (as required by its Regional Reliability Organization) shall provide, and annually update, its underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database.	underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database but its annual update was late by 30 calendar days or less.	underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database but its annual update was late by more than 30 calendar days but less than or equal to 40 calendar days	underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database but its annual update was late by more than 40 calendar days but less than or equal to 50 calendar days.	underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database, OR The responsible entity's annual update was late by more than 50 calendar days.
PRC-007-0	R3.	The Transmission Owner and Distribution Provider that owns a UFLS program (as required by its Regional Reliability Organization) shall provide its documentation of that UFLS program to its Regional Reliability Organization on request (30 calendar days).	The responsible entity has provided the documentation in more than 30 calendar days but less than or equal to 40 calendar days.	The responsible entity has provided the documentation in more than 40 calendar days but less than or equal to 50 calendar days.	The responsible entity has provided the documentation in more than 50 calendar days but less than or equal to 60 calendar days.	The responsible entity has not provided the documentation for more than 60 calendar days.
PRC-008-0	R1.	The Transmission Owner and Distribution Provider with a UFLS program (as	The UFLS equipment identification, testing schedule or maintenance	The UFLS equipment identification, testing schedule, or maintenance	The UFLS equipment identification, testing schedule, or maintenance	The responsible entity failed to implement UFLS equipment maintenance and

Violation Severity Level Matrix (PRC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		required by its Regional Reliability Organization) shall have a UFLS equipment maintenance and testing program in place. This UFLS equipment maintenance and testing program shall include UFLS equipment identification, the schedule for UFLS equipment testing, and the schedule for UFLS equipment maintenance.	schedule for the responsible entity's UFLS equipment maintenance and testing program was missing 5% or less of the applicable equipment.	schedule for the responsible entity's UFLS equipment maintenance and testing program was missing for more than 5% up to (and including) 10% of the applicable equipment.	schedule for the responsible entity's UFLS equipment maintenance and testing program was missing more than 10% up to (and including) 15% of the applicable equipment.	testing program. OR The UFLS equipment identification, testing schedule, or maintenance schedule for the responsible entity's UFLS equipment maintenance and testing program was missing more than 15% of the applicable equipment.
PRC-008-0	R2.	The Transmission Owner and Distribution Provider with a UFLS program (as required by its Regional Reliability Organization) shall implement its UFLS equipment maintenance and testing program and shall provide UFLS maintenance and testing program results to its	The responsible entity provided documentation of its UFLS equipment maintenance and testing program more than 30 calendar days following a request from its Regional Reliability Organization and/or NERC. OR Evidence UFLS equipment was	Evidence UFLS equipment was maintained and tested within the defined intervals was missing for more than 5% up to (and including) 10% of the applicable devices.	Evidence UFLS equipment was maintained and tested within the defined intervals was missing for more than 10% up to (and including) 15% of the applicable devices.	Evidence UFLS equipment was maintained and tested within the defined intervals was missing for more than 15% of the applicable devices.

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Regional Reliability Organization and NERC on request (within 30 calendar days).	maintained and tested within the defined intervals was missing for 5% or less of the applicable devices.			
PRC-009-0	R1.	The Transmission Owner, Transmission Operator, Load-Serving Entity, and Distribution Provider that owns or operates a UFLS program (as required by its Regional Reliability Organization) shall analyze and document its UFLS program performance in accordance with its Regional Reliability Organization's UFLS program. The analysis shall address the performance of UFLS equipment and program effectiveness following system events resulting in system frequency	The responsible entity that owns or operates a UFLS program failed to include one of the elements listed in PRC-009-0 R1.1 through R1.4 in the analysis of the performance of UFLS equipment and Program effectiveness, as described in PRC-009-0 R1, following system events resulting in system frequency excursions below the initializing set points of the UFLS program.	The responsible entity that owns or operates a UFLS program failed to include two of the elements listed in PRC-009-0 R1.1 through R1.4 in the analysis of the performance of UFLS equipment and Program effectiveness, as described in PRC-009-0 R1, following system events resulting in system frequency excursions below the initializing set points of the UFLS program.	The responsible entity that owns or operates a UFLS program failed to include three of the elements listed in PRC-009-0 R1.1 through R1.4 in the analysis of the performance of UFLS equipment and Program effectiveness, as described in PRC-009-0 R1, following system events resulting in system frequency excursions below the initializing set points of the UFLS program.	The responsible entity that owns or operates a UFLS program failed to conduct an analysis of the performance of UFLS equipment and Program effectiveness, as described in PRC-009-0 R1, following system events resulting in system frequency excursions below the initializing set points of the UFLS program.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		excursions below the initializing set points of the UFLS program. The analysis shall include, but not be limited to:				
PRC-009-0	R1.1.	A description of the event including initiating conditions.	N/A	N/A	N/A	N/A
PRC-009-0	R1.2.	A review of the UFLS set points and tripping times.	N/A	N/A	N/A	N/A
PRC-009-0	R1.3.	A simulation of the event.	N/A	N/A	N/A	N/A
PRC-009-0	R1.4.	A summary of the findings.	N/A	N/A	N/A	N/A
PRC-010-0	R1.	The Load-Serving Entity, Transmission Owner, Transmission Operator, and Distribution Provider that owns or operates a UVLS program shall periodically (at least every five years or as required by changes in system conditions) conduct and document an assessment of the	The responsible entity conducted an assessment of the effectiveness of its UVLS system within 5 years or as required by changes in system conditions but did not include the associated Transmission Planner(s) and Planning Authority (ies).	The responsible entity did not conduct an assessment of the effectiveness of its UVLS system for more than 5 years but did in less than or equal to 7 years. OR The assessment of the effectiveness of the responsible entity's UVLS system did not address one of the	The responsible entity did not conduct an assessment of the effectiveness of its UVLS system for more than 7 years but did in less than or equal to 10 years. OR The assessment of the effectiveness of the responsible entity's UVLS system did not address two of the	The responsible entity did not conduct an assessment of the effectiveness of its UVLS system for more than 10 years. OR The assessment of the effectiveness of the responsible entity's UVLS system did not address any of the elements in R1 (R1.1.1 through

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		effectiveness of the UVLS program. This assessment shall be conducted with the associated Transmission Planner(s) and Planning Authority(ies).		elements in R1 (R1.1.1 through R1.1.3.).	elements in R1 (R1.1.1 through R1.1.3.).	R1.1.3.).
PRC-010-0	R1.1.	This assessment shall include, but is not limited to:	N/A	N/A	N/A	N/A
PRC-010-0	R1.1.1.	Coordination of the UVLS programs with other protection and control systems in the Region and with other Regional Reliability Organizations, as appropriate.	N/A	N/A	N/A	N/A
PRC-010-0	R1.1.2.	Simulations that demonstrate that the UVLS programs performance is consistent with Reliability Standards TPL-001-0, TPL-002-0, TPL-003-0 and TPL-004-0.	N/A	N/A	N/A	N/A
PRC-010-0	R1.1.3.	A review of the voltage set points and timing.	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
PRC-010-0	R2.	The Load-Serving Entity, Transmission Owner, Transmission Operator, and Distribution Provider that owns or operates a UVLS program shall provide documentation of its current UVLS program assessment to its Regional Reliability Organization and NERC on request (30 calendar days).	The responsible entity provided documentation of its current UVLS program assessment more than 30 calendar but less than or equal to 40 calendar days following a request from its Regional Reliability Organization or NERC.	The responsible entity provided documentation of its current UVLS program assessment more than 40 calendar days but less than or equal to 50 calendar days following a request from its Regional Reliability Organization or NERC.	The responsible entity provided documentation of its current UVLS program assessment more than 50 calendar days but less than or equal to 60 calendar days following a request from its Regional Reliability Organization or NERC.	The responsible entity did not provide documentation of its current UVLS program assessment for more than 60 calendar days following a request from its Regional Reliability Organization or NERC.
PRC-011-0	R1.	The Transmission Owner and Distribution Provider that owns a UVLS system shall have a UVLS equipment maintenance and testing program in place. This program shall include:	The responsible entity's UVLS equipment maintenance and testing program did not address one of the subrequirements in R1.2 through R1.6. OR The responsible entity's UVLS program did not address one of the equipment classes as specified in R1.1.1	The responsible entity's UVLS equipment maintenance and testing program did not address two of the subrequirements in R1.2 through R1.6. OR The responsible entity's UVLS program did not address two of the equipment classes as specified in R1.1.1	The responsible entity's UVLS equipment maintenance and testing program did not address three of the subrequirements in R1.1 through R1.6. OR The responsible entity's UVLS program did not address three of the equipment classes as specified in R1.1.1	The responsible entity's UVLS equipment maintenance and testing program did not address four or more of the subrequirements in R1.2 through R1.6. OR The responsible entity's UVLS program did not address any of the equipment classes as specified in R1.1.1

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			through R1.1.4.	through R1.1.4.	through R1.1.4.	through R1.1.4.
PRC-011-0	R1.1.	The UVLS system identification which shall include but is not limited to:	N/A	N/A	N/A	N/A
PRC-011-0	R1.1.1.	Relays.	N/A	N/A	N/A	N/A
PRC-011-0	R1.1.2.	Instrument transformers.	N/A	N/A	N/A	N/A
PRC-011-0	R1.1.3.	Communications systems, where appropriate.	N/A	N/A	N/A	N/A
PRC-011-0	R1.1.4.	Batteries.	N/A	N/A	N/A	N/A
PRC-011-0	R1.2.	Documentation of maintenance and testing intervals and their basis.	N/A	N/A	N/A	N/A
PRC-011-0	R1.3.	Summary of testing procedure.	N/A	N/A	N/A	N/A
PRC-011-0	R1.4.	Schedule for system testing.	N/A	N/A	N/A	N/A
PRC-011-0	R1.5.	Schedule for system maintenance.	N/A	N/A	N/A	N/A
PRC-011-0	R1.6.	Date last tested/maintained.	N/A	N/A	N/A	N/A
PRC-011-0	R2.	The Transmission Owner and Distribution Provider that owns a UVLS system shall provide	The responsible entity provided documentation of its UVLS equipment maintenance and testing program	The responsible entity provided documentation of its UVLS equipment maintenance and testing program	The responsible entity provided documentation of its UVLS equipment maintenance and testing program	The responsible entity did not provide documentation of its UVLS equipment maintenance and

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		documentation of its UVLS equipment maintenance and testing program and the implementation of that UVLS equipment maintenance and testing program to its Regional Reliability Organization and NERC on request (within 30 calendar days).	more than 30 but less than or equal to 40 days following a request from its Regional Reliability Organization and/or NERC. OR Evidence UVLS equipment was maintained and tested within the defined intervals was missing for 5% or less of the applicable devices.	more than 40 but less than or equal to 50 days following a request from its Regional Reliability Organization and/or NERC. OR Evidence UVLS equipment was maintained and tested within the defined intervals was missing for more than 5% up to (and including) 10% of the applicable devices.	more than 50 but less than or equal to 60 days following a request from its Regional Reliability Organization and/or NERC. OR Evidence UVLS equipment was maintained and tested within the defined intervals was missing for more than 10% up to (and including) 15% of the applicable devices.	testing program for more than 60 days following a request from its Regional Reliability Organization and/or NERC. OR Evidence UVLS equipment was maintained and tested within the defined intervals was missing for more than 15% of the applicable devices.
PRC-015-0	R1.	The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall maintain a list of and provide data for existing and proposed SPSs as specified in Reliability Standard PRC-013-0_R1.	N/A	The responsible entity's list of existing or proposed SPSs did not address one of the subrequirements in R1.1 through R1.3 as specified in Reliability Standard PRC-013-0_R1.	The responsible entity's list of existing or proposed SPSs did not address two of the subrequirements in R1.1 through R1.3 as specified in Reliability Standard PRC-013-0_R1.	The responsible entity's list of existing or proposed SPSs did not address any of the subrequirements in R1.1 through R1.3 as specified in Reliability Standard PRC-013-0_R1.
PRC-015-0	R2.	The Transmission Owner, Generator Owner, and	The responsible entity was not compliant in that	The responsible entity was not compliant in that	The responsible entity was not compliant in that	The responsible entity was not compliant in that

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Distribution Provider that owns an SPS shall have evidence it reviewed new or functionally modified SPSs in accordance with the Regional Reliability Organization's procedures as defined in Reliability Standard PRC-012-0_R1 prior to being placed in service.	evidence that it reviewed new or functionally modified SPSs in accordance with the Regional Reliability Organization's procedures did not address one of the subrequirements in R1.1 through R1.9 as specified in Reliability Standard PRC-012-0_R1 prior to being placed in service.	evidence that it reviewed new or functionally modified SPSs in accordance with the Regional Reliability Organization's procedures did not address two of the subrequirements in R1.1 through R1.9 as specified in Reliability Standard PRC-012-0_R1 prior to being placed in service.	evidence that it reviewed new or functionally modified SPSs in accordance with the Regional Reliability Organization's procedures did not address three of the subrequirements in R1.1 through R1.9 as specified in Reliability Standard PRC-012-0_R1 prior to being placed in service.	evidence that it reviewed new or functionally modified SPSs in accordance with the Regional Reliability Organization's procedures did not address four or more of the subrequirements in R1.1 through R1.9 as specified in Reliability Standard PRC-012-0_R1 prior to being placed in service.
PRC-015-0	R3.	The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall provide documentation of SPS data and the results of studies that show compliance of new or functionally modified SPSs with NERC Reliability Standards and Regional Reliability Organization criteria to affected Regional Reliability	The responsible entity provided documentation of its SPS data and the results of the studies that show compliance of new or functionally modified SPSs more than 30 calendar days but less than or equal to 40 calendar days following a request from its Regional Reliability Organization or NERC.	The responsible entity provided documentation of its SPS data and the results of the studies that show compliance of new or functionally modified SPSs more than 40 calendar days but less than or equal to 50 calendar days following a request from its Regional Reliability Organization or NERC.	The responsible entity provided documentation of its SPS data and the results of the studies that show compliance of new or functionally modified SPSs more than 50 calendar days but less than or equal to 60 calendar days following a request from its Regional Reliability Organization or NERC.	The responsible entity provided documentation of its SPS data and the results of the studies that show compliance of new or functionally modified SPSs more than 60 calendar days following a request from its Regional Reliability Organization or NERC.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Organizations and NERC on request (within 30 calendar days).				
PRC-016-0.1	R1.	The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall analyze its SPS operations and maintain a record of all misoperations in accordance with the Regional SPS review procedure specified in Reliability Standard PRC-012-0_R1.	N/A	N/A	N/A	The responsible entity that owns an SPS did not analyze its SPS operations and maintain a record of all Misoperations in accordance with the Regional SPS review procedure specified in Reliability Standard PRC-012-0_R 1.
PRC-016-0.1	R2.	The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall take corrective actions to avoid future misoperations.	For each Misoperation, the responsible entity that owns an SPS did not take 5% or less of the corrective actions designed to avoid future SPS Misoperations.	For each Misoperation, the responsible entity that owns an SPS did not take more than 5% up to (and including) 10% of the corrective actions designed to avoid future SPS Misoperations.	For each Misoperation, the responsible entity that owns an SPS did not take more than 10% up to (and including) 15% of the corrective actions designed to avoid future SPS Misoperations.	For each Misoperation, the responsible entity that owns an SPS did not take more than 15% of the corrective actions designed to avoid future SPS Misoperations.
PRC-016-0.1	R3.	The Transmission Owner, Generator Owner, and	The responsible entity provided documentation of its	The responsible entity provided documentation of its	The responsible entity provided documentation of its	The responsible entity provided documentation of its

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Distribution Provider that owns an SPS shall provide documentation of the misoperation analyses and the corrective action plans to its Regional Reliability Organization and NERC on request (within 90 calendar days).	SPS Misoperation analyses and the corrective action plans more than 90 calendar days but less than or equal to 120 calendar days following a request from its Regional Reliability Organization or NERC.	SPS Misoperation analyses and the corrective action plans more than 120 calendar days but less than or equal to 130 calendar days following a request from its Regional Reliability Organization or NERC.	SPS Misoperation analyses and the corrective action plans more than 130 calendar days but less than or equal to140 calendar days following a request from its Regional Reliability Organization or NERC.	SPS Misoperation analyses and the corrective action plans more than 140 calendar days following a request from its Regional Reliability Organization or NERC. OR Did not provide the documentation.
PRC-017-0	R1.	The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall have a system maintenance and testing program(s) in place. The program(s) shall include:	The responsible entity's SPS equipment maintenance and testing program did not address one of the subrequirements in R1.2 through R1.6. OR The responsible entity's SPS program did not address one of the equipment classes as specified in R1.1.1 through R1.1.4.	The responsible entity's SPS equipment maintenance and testing program did not address two of the subrequirements in R1.2 through R1.6. OR The responsible entity's SPS program did not address two of the equipment classes as specified in R1.1.1 through R1.1.4.	The responsible entity's SPS equipment maintenance and testing program did not address three of the subrequirements in R1.2 through R1.6. OR The responsible entity's SPS program did not address three of the equipment classes as specified in R1.1.1 through R1.1.4.	The responsible entity's SPS equipment maintenance and testing program did not address four or more of the subrequirements in R1.2 through R1.6. OR The responsible entity's SPS program did not address any of the equipment classes as specified in R1.1.1 through R1.1.4.
PRC-017-0	R1.1.	SPS identification shall include but is not limited to:	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
PRC-017-0	R1.1.1.	Relays.	N/A	N/A	N/A	N/A
PRC-017-0	R1.1.2.	Instrument transformers.	N/A	N/A	N/A	N/A
PRC-017-0	R1.1.3.	Communications systems, where appropriate.	N/A	N/A	N/A	N/A
PRC-017-0	R1.1.4.	Batteries.	N/A	N/A	N/A	N/A
PRC-017-0	R1.2.	Documentation of maintenance and testing intervals and their basis.	N/A	N/A	N/A	N/A
PRC-017-0	R1.3.	Summary of testing procedure.	N/A	N/A	N/A	N/A
PRC-017-0	R1.4.	Schedule for system testing.	N/A	N/A	N/A	N/A
PRC-017-0	R1.5.	Schedule for system maintenance.	N/A	N/A	N/A	N/A
PRC-017-0	R1.6.	Date last tested/maintained.	N/A	N/A	N/A	N/A
PRC-018-1	R1.	Each Transmission Owner and Generator Owner required to install DMEs by its Regional Reliability Organization (reliability standard PRC-002 Requirements 1-3) shall have DMEs installed that meet	N/A	N/A	The installation of DMEs does not include one of the subrequirements in R1.1 and R1.2.	The installation of DMEs does not include any of the subrequirements in R1.1 and R1.2.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		the following requirements:				
PRC-018-1	R1.1.	Internal Clocks in DME devices shall be synchronized to within 2 milliseconds or less of Universal Coordinated Time scale (UTC)	N/A	N/A	N/A	N/A
PRC-018-1	R1.2.	Recorded data from each Disturbance shall be retrievable for ten calendar days.	N/A	N/A	N/A	N/A
PRC-018-1	R2.	The Transmission Owner and Generator Owner shall each install DMEs in accordance with its Regional Reliability Organization's installation requirements (reliability standard PRC-002 Requirements 1 through 3).	The responsible entity failed to install 5% or less of the DME devices in accordance with its Regional Reliability Organization's installation requirements as defined in PRC-002 R1 through R3.	The responsible entity failed to install more than 5% up to (and including) 10% of the DME devices in accordance with its Regional Reliability Organization's installation requirements as defined in PRC-002 R1 through R3.	The responsible entity failed to install more than 10% up to (and including) 15% of the DME devices in accordance with its Regional Reliability Organization's installation requirements as defined in PRC-002 R1 through R3.	The responsible entity failed to install more than 15% of the DME devices in accordance with its Regional Reliability Organization's installation requirements as defined in PRC-002 R1 through R3.
PRC-018-1	R3.	The Transmission Owner and Generator Owner shall each maintain, and report to its	Evidence that the responsible entity maintained data on the DMEs installed to meet that region's	Evidence that the responsible entity maintained data on the DMEs installed to meet that region's	Evidence that the responsible entity maintained data on the DMEs installed to meet that region's	Evidence that the responsible entity maintained data on the DMEs installed to meet that region's

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Regional Reliability Organization on request, the following data on the DMEs installed to meet that region's installation requirements (reliability standard PRC-002 Requirements1.1, 2.1 and 3.1):	installation requirements was missing or not reported for one of the subrequirements in R3.1 through R3.8.	installation requirements was missing or not reported for two of the subrequirements in R3.1 through R3.8.	installation requirements was missing or not reported for three of the subrequirements in R3.1 through R3.8.	installation requirements was missing or not reported for four or more of the subrequirements in R3.1 through R3.8.
PRC-018-1	R3.1.	Type of DME (sequence of event recorder, fault recorder, or dynamic disturbance recorder).	N/A	N/A	N/A	N/A
PRC-018-1	R3.2.	Make and model of equipment.	N/A	N/A	N/A	N/A
PRC-018-1	R3.3.	Installation location.	N/A	N/A	N/A	N/A
PRC-018-1	R3.4.	Operational status.	N/A	N/A	N/A	N/A
PRC-018-1	R3.5.	Date last tested.	N/A	N/A	N/A	N/A
PRC-018-1	R3.6.	Monitored elements, such as transmission circuit, bus section, etc.	N/A	N/A	N/A	N/A
PRC-018-1	R3.7.	Monitored devices, such as circuit breaker, disconnect status, alarms, etc.	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
PRC-018-1	R3.8.	Monitored electrical quantities, such as voltage, current, etc.	N/A	N/A	N/A	N/A
PRC-018-1	R4.	The Transmission Owner and Generator Owner shall each provide Disturbance data (recorded by DMEs) in accordance with its Regional Reliability Organization's requirements (reliability standard PRC-002 Requirement 4).	The responsible entity did not provide 5% or less of the disturbance data (recorded by DMEs) in accordance with its Regional Reliability Organization's requirements.	The responsible entity did not provide more than 5% up to (and including) 10% of the disturbance data (recorded by DMEs) in accordance with its Regional Reliability Organization's requirements.	The responsible entity did not provide more than 10% up to (and including) 15% of the disturbance data (recorded by DMEs) in accordance with its Regional Reliability Organization's requirements.	The responsible entity did not provide more than 15% of the disturbance data (recorded by DMEs) in accordance with its Regional Reliability Organization's requirements.
PRC-018-1	R5.	The Transmission Owner and Generator Owner shall each archive all data recorded by DMEs for Regional Reliability Organization-identified events for at least three years.	5% or less of the responsible entity's data recorded by DMEs for Regional Reliability Organization-identified events was not archived for at least three years.	More than 5% up to (and including) 10% of the responsible entity's data recorded by DMEs for Regional Reliability Organization-identified events was not archived for at least three years.	More than 10% up to (and including) 15% of the responsible entity's data recorded by DMEs for Regional Reliability Organization-identified events was not archived for at least three years.	More than 15% of the responsible entity's data recorded by DMEs for Regional Reliability Organization-identified events was not archived for at least three years.
PRC-021-1	R1.	Each Transmission Owner and Distribution Provider that owns a UVLS program to mitigate the risk of	UVLS data was provided but did not address one of the subrequirements in R1.1 through R1.5.	UVLS data was provided but did not address two of the subrequirements in R1.1 through R1.5.	UVLS data was provided but did not address three of the subrequirements in R1.1 through R1.5.	No annual UVLS data was provided. OR UVLS data was provided but did not

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		voltage collapse or voltage instability in the BES shall annually update its UVLS data to support the Regional UVLS program database. The following data shall be provided to the Regional Reliability Organization for each installed UVLS system:				address four or more of the subrequirements in R1.1 through R1.5.
PRC-021-1	R1.1.	Size and location of customer load, or percent of connected load, to be interrupted.	N/A	N/A	N/A	N/A
PRC-021-1	R1.2.	Corresponding voltage set points and overall scheme clearing times.	N/A	N/A	N/A	N/A
PRC-021-1	R1.3.	Time delay from initiation to trip signal.	N/A	N/A	N/A	N/A
PRC-021-1	R1.4.	Breaker operating times.	N/A	N/A	N/A	N/A
PRC-021-1	R1.5.	Any other schemes that are part of or impact the UVLS programs such as related generation	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		protection, islanding schemes, automatic load restoration schemes, UFLS and Special Protection Systems.				
PRC-021-1	R2.	Each Transmission Owner and Distribution Provider that owns a UVLS program shall provide its UVLS program data to the Regional Reliability Organization within 30 calendar days of a request.	The responsible entity updated its UVLS data more than 30 calendar days but less than or equal to 40 calendar days following a request from its Regional Reliability Organization.	The responsible entity updated its UVLS data more than 40 calendar days but less than or equal to 50 calendar days following a request from its Regional Reliability Organization.	The responsible entity updated its UVLS data more than 50 calendar days but less than or equal to 60 calendar days following a request from its Regional Reliability Organization.	The responsible entity did not update its UVLS data for more than 60 calendar days following a request from its Regional Reliability Organization.
PRC-022-1	R1.	Each Transmission Operator, Load-Serving Entity, and Distribution Provider that operates a UVLS program to mitigate the risk of voltage collapse or voltage instability in the BES shall analyze and document all UVLS operations and Misoperations. The analysis shall include:	The overall analysis program did not address one of the subrequirements in R1.1 through R1.5.	The overall analysis program did not address two of the subrequirements in R1.1 through R1.5.	The overall analysis program did not address three of the subrequirements in R1.1 through R1.5.	The responsible entity failed to analyze and document a UVLS operation and Misoperation. OR The overall analysis program did not address four or more of the subrequirements in R1.1 through R1.5.
PRC-022-1	R1.1.	A description of the	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		event including initiating conditions.				
PRC-022-1	R1.2.	A review of the UVLS set points and tripping times.	N/A	N/A	N/A	N/A
PRC-022-1	R1.3.	A simulation of the event, if deemed appropriate by the Regional Reliability Organization. For most events, analysis of sequence of events may be sufficient and dynamic simulations may not be needed.	N/A	N/A	N/A	N/A
PRC-022-1	R1.4.	A summary of the findings.	N/A	N/A	N/A	N/A
PRC-022-1	R1.5.	For any Misoperation, a Corrective Action Plan to avoid future Misoperations of a similar nature.	N/A	N/A	N/A	N/A
PRC-022-1	R2.	Each Transmission Operator, Load-Serving Entity, and Distribution Provider that operates a UVLS program shall provide documentation of its	The responsible entity provided documentation of the analysis of UVLS program performance more than 90 calendar days but less than or equal to 120	The responsible entity provided documentation of the analysis of UVLS program performance more than 120 calendar days but less than or equal to 130	The responsible entity provided documentation of the analysis of UVLS program performance more than 130 calendar days but less than or equal to 140	The responsible entity did not provide documentation of the analysis of UVLS program performance for more than 140 calendar days

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		analysis of UVLS program performance to its Regional Reliability Organization within 90 calendar days of a request.	calendar days following a request from its Regional Reliability Organization.	calendar days following a request from its Regional Reliability Organization.	calendar days following a request from its Regional Reliability Organization.	following a request from its Regional Reliability Organization.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
TOP-001-1	R2.	Each Transmission Operator shall take immediate actions to alleviate operating emergencies including curtailing transmission service or energy schedules, operating equipment (e.g., generators, phase shifters, breakers), shedding firm load, etc.	N/A	N/A	N/A	The Transmission Operator failed to have evidence that it took immediate actions to alleviate operating emergencies including curtailing transmission service or energy schedules, operating equipment (e.g., generators, phase shifters, breakers), shedding firm load, etc.
TOP-001-1	R3.	Each Transmission Operator, Balancing Authority, and Generator Operator shall comply with reliability directives issued by the Reliability Coordinator, and each Balancing Authority and Generator Operator shall comply with reliability directives issued by the Transmission Operator, unless such actions would violate safety, equipment, regulatory or statutory requirements. Under these circumstances the	N/A	N/A	N/A	The responsible entity failed to comply with reliability directives issued by the Reliability Coordinator or the Transmission Operator (when applicable), when said directives would not have resulted in actions that would violate safety, equipment, regulatory or statutory requirements, or under circumstances that said directives would have resulted in actions that would violate safety, equipment, regulatory or statutory requirements the

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Transmission Operator, Balancing Authority, or Generator Operator shall immediately inform the Reliability Coordinator or Transmission Operator of the inability to perform the directive so that the Reliability Coordinator or Transmission Operator can implement alternate remedial actions.				responsible entity failed to inform the Reliability Coordinator or Transmission Operator (when applicable) of the inability to perform the directive so that the Reliability Coordinator or Transmission Operator could implement alternate remedial actions.
TOP-001-1	R4.	Each Distribution Provider and Load-Serving Entity shall comply with all reliability directives issued by the Transmission Operator, including shedding firm load, unless such actions would violate safety, equipment, regulatory or statutory requirements. Under these circumstances, the Distribution Provider or Load-Serving Entity shall immediately inform the Transmission Operator of the inability to	N/A	N/A	N/A	The responsible entity failed to comply with all reliability directives issued by the Transmission Operator, including shedding firm load, when said directives would not have resulted in actions that would violate safety, equipment, regulatory or statutory requirements, or under circumstances when said directives would have violated safety, equipment, regulatory or statutory requirements, the responsible entity

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		perform the directive so that the Transmission Operator can implement alternate remedial actions.				failed to immediately inform the Transmission Operator of the inability to perform the directive so that the Transmission Operator could implement alternate remedial actions.
TOP-001-1	R5.	Each Transmission Operator shall inform its Reliability Coordinator and any other potentially affected Transmission Operators of real-time or anticipated emergency conditions, and take actions to avoid, when possible, or mitigate the emergency.	N/A	The Transmission Operator failed to inform its Reliability Coordinator and any other potentially affected Transmission Operators of real-time or anticipated emergency conditions, but did take actions to avoid, when possible, or mitigate the emergency.	N/A	The Transmission Operator failed to inform its Reliability Coordinator and any other potentially affected Transmission Operators of real-time or anticipated emergency conditions, and failed to take actions to avoid, when possible, or mitigate the emergency.
TOP-001-1	R6.	Each Transmission Operator, Balancing Authority, and Generator Operator shall render all available emergency assistance to others as requested, provided	N/A	N/A	N/A	The responsible entity failed to render all available emergency assistance to others as requested, after the requesting entity had implemented its comparable emergency

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		that the requesting entity has implemented its comparable emergency procedures, unless such actions would violate safety, equipment, or regulatory or statutory requirements.				procedures, when said assistance would not have resulted in actions that would violate safety, equipment, or regulatory or statutory requirements.
TOP-001-1	R7.	Each Transmission Operator and Generator Operator shall not remove Bulk Electric System facilities from service if removing those facilities would burden neighboring systems unless:	N/A	N/A	N/A	The responsible entity removed Bulk Electric System facilities from service and removal of said facilities burdened a neighboring system, without complying with the applicable requirements listed in R7.1 through R7.3.
TOP-001-1	R7.1.	For a generator outage, the Generator Operator shall notify and coordinate with the Transmission Operator. The Transmission Operator shall notify the Reliability Coordinator and other affected Transmission Operators, and coordinate the impact of removing the Bulk Electric System facility.	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
TOP-001-1	R7.2.	For a transmission facility, the Transmission Operator shall notify and coordinate with its Reliability Coordinator. The Transmission Operator shall notify other affected Transmission Operators, and coordinate the impact of removing the Bulk Electric System facility.	N/A	N/A	N/A	N/A
TOP-001-1	R7.3.	When time does not permit such notifications and coordination, or when immediate action is required to prevent a hazard to the public, lengthy customer service interruption, or damage to facilities, the Generator Operator shall notify the Transmission Operator, and the Transmission Operator shall notify its Reliability Coordinator and adjacent Transmission Operators, at the	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		earliest possible time.				
TOP-001-1	R8.	During a system emergency, the Balancing Authority and Transmission Operator shall immediately take action to restore the Real and Reactive Power Balance. If the Balancing Authority or Transmission Operator is unable to restore Real and Reactive Power Balance it shall request emergency assistance from the Reliability Coordinator. If corrective action or emergency assistance is not adequate to mitigate the Real and Reactive Power Balance, then the Reliability Coordinator, Balancing Authority, and Transmission Operator shall implement firm load shedding.	N/A	N/A	N/A	The responsible entity failed to take immediate actions to restore the Real and Reactive Power Balance during a system emergency. OR The responsible entity failed to request emergency assistance from the Reliability Coordinator during a period when it was unable to restore the Real and Reactive Power Balance, OR During a period when corrective actions or emergency assistance was not adequate to mitigate the Real and Reactive Power Balance, the responsible entity failed to implement firm load shedding.
TOP-002-2a	R1.	Each Balancing Authority and Transmission Operator shall maintain a set of	N/A	N/A	The responsible entity maintained a set of current plans that were designed	The responsible entity failed to maintain a set of current plans that were designed to

Violation Severity Level Matrix (TOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		current plans that are designed to evaluate options and set procedures for reliable operation through a reasonable future time period. In addition, each Balancing Authority and Transmission Operator shall be responsible for using available personnel and system equipment to implement these plans to ensure that interconnected system reliability will be maintained.			to evaluate options and set procedures for reliable operation through a reasonable future time period, but failed to utilize available personnel and system equipment to implement these plans to ensure that interconnected system reliability would be maintained.	evaluate options and set procedures for reliable operation through a reasonable future time period.
TOP-002-2a	R2.	Each Balancing Authority and Transmission Operator shall ensure its operating personnel participate in the system planning and design study processes, so that these studies contain the operating personnel perspective and system operating personnel are aware of the planning purpose.	N/A	N/A	N/A	The responsible entity failed to ensure its operating personnel participated in the system planning and design study processes.
TOP-002-2a	R4.	Each Balancing		The responsible	The responsible	The responsible entity

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Authority and Transmission Operator shall coordinate (where confidentiality agreements allow) its current-day, next-day, and seasonal planning and operations with neighboring Balancing Authorities and Transmission Operators and with its Reliability Coordinator, so that normal Interconnection operation will proceed in an orderly and consistent manner.		entity failed to coordinate (where confidentiality agreements allow) one of the following three categories of operations (current-day, next-day or seasonal) with the applicable entity(ies)	entity failed to coordinate (where confidentiality agreements allow) two of the following three categories of operations (current-day, next-day or seasonal) with the applicable entity(ies)	failed to coordinate (where confidentiality agreements allow) all three of the following categories of operations (current-day, next-day or seasonal) with the applicable entity(ies)
TOP-002-2a	R5.	Each Balancing Authority and Transmission Operator shall plan to meet scheduled system configuration, generation dispatch, interchange scheduling and demand patterns.	N/A	N/A	N/A	The responsible entity failed to plan to meet scheduled system configuration, generation dispatch, interchange scheduling and demand patterns.
TOP-002-2a	R6.	Each Balancing Authority and Transmission Operator shall plan to meet unscheduled changes in system configuration and generation dispatch	N/A	N/A	N/A	The responsible entity failed to plan to meet unscheduled changes in system configuration and generation dispatch (at a minimum N-1 Contingency planning)

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		(at a minimum N-1 Contingency planning) in accordance with NERC, Regional Reliability Organization, subregional, and local reliability requirements.				in accordance with NERC, Regional Reliability Organization, subregional and local reliability requirements.
TOP-002-2a	R7.	Each Balancing Authority shall plan to meet capacity and energy reserve requirements, including the deliverability/capability for any single Contingency.	N/A	N/A	N/A	The Balancing Authority failed to plan to meet capacity and energy reserve requirements, including the deliverability/capability for any single Contingency.
TOP-002-2a	R8.	Each Balancing Authority shall plan to meet voltage and/or reactive limits, including the deliverability/capability for any single contingency.	N/A	N/A	N/A	The Balancing Authority failed to plan to meet voltage and/or reactive limits, including the deliverability/capability for any single contingency.
TOP-002-2a	R9.	Each Balancing Authority shall plan to meet Interchange Schedules and ramps.	N/A	N/A	N/A	The Balancing Authority failed to plan to meet Interchange Schedules and Ramps.
TOP-002-2a	R10.	Each Balancing Authority and Transmission Operator	N/A	N/A	N/A	The responsible entity failed to plan to meet all System Operating

Violation Severity Level Matrix (TOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).				Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).
TOP-002-2a	R12.	The Transmission Service Provider shall include known SOLs or IROLs within its area and neighboring areas in the determination of transfer capabilities, in accordance with filed tariffs and/or regional Total Transfer Capability and Available Transfer Capability calculation processes.	N/A	N/A	N/A	The Transmission Service Provider failed to include known SOLs or IROLs within its area and neighboring areas in the determination of transfer capabilities, in accordance with filed tariffs and/or regional Total Transfer Capability and Available Transfer Capability calculation processes.
TOP-002-2a	R13.	At the request of the Balancing Authority or Transmission Operator, a Generator Operator shall perform generating real and reactive capability verification that shall include, among other variables, weather, ambient air and water conditions, and fuel quality and quantity,	N/A	N/A	N/A	The Generator Operator failed to perform generating real and reactive capability verification that included, among other variables, weather, ambient air and water conditions, and fuel quality and quantity, or failed to provide the results of generating real and reactive

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		and provide the results to the Balancing Authority or Transmission Operator operating personnel as requested.				verifications Balancing Authority or Transmission Operator operating personnel, when requested.
TOP-002-2a	R14.	Generator Operators shall, without any intentional time delay, notify their Balancing Authority and Transmission Operator of changes in capabilities and characteristics including but not limited to:	N/A	N/A	N/A	The Generator Operator failed to notify its Balancing Authority or Transmission Operator of changes in capabilities and characteristics including real output capabilities.
TOP-002-2a	R14.1.	Changes in real output capabilities.	N/A	N/A	N/A	N/A
TOP-002-2a	R14.2.	Automatic Voltage Regulator status and mode setting. (Retired August 1, 2007)	N/A	N/A	N/A	N/A
TOP-002-2a	R15.	Generation Operators shall, at the request of the Balancing Authority or Transmission Operator, provide a forecast of expected real power output to assist in operations planning (e.g., a seven-day	N/A	N/A	N/A	The Generator Operator failed to provide, at the request of the Balancing Authority or Transmission Operator, a forecast of expected real power output to assist in operations planning (e.g., a seven-

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		forecast of real output).				day forecast of real output).
TOP-002-2a	R18.	Neighboring Balancing Authorities, Transmission Operators, Generator Operators, Transmission Service Providers, and Load-Serving Entities shall use uniform line identifiers when referring to transmission facilities of an interconnected network.	N/A	N/A	N/A	The responsible entity failed to use uniform line identifiers when referring to transmission facilities of an interconnected network.
TOP-002-2a	R19.	Each Balancing Authority and Transmission Operator shall maintain accurate computer models utilized for analyzing and planning system operations.	N/A	N/A	N/A	The responsible entity failed to maintain accurate computer models utilized for analyzing and planning system operations.
TOP-003-0	R1.	Generator Operators and Transmission Operators shall provide planned outage information.	N/A	N/A	N/A	N/A
TOP-003-0	R1.1.	Each Generator Operator shall provide outage information daily to its	N/A	N/A	N/A	The Generator Operator failed to provide outage information, in

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Transmission Operator for scheduled generator outages planned for the next day (any foreseen outage of a generator greater than 50 MW). The Transmission Operator shall establish the outage reporting requirements.				accordance with its Transmission Operator's established outage reporting requirements, to its Transmission Operator for scheduled generator outages planned for the next day (any foreseen outage of a generator greater than 50 MW). OR The Transmission Operator failed to establish the outage reporting requirements.
TOP-003-0	R1.2.	Each Transmission Operator shall provide outage information daily to its Reliability Coordinator, and to affected Balancing Authorities and Transmission Operators for scheduled generator and bulk transmission outages planned for the next day (any foreseen outage of a transmission line or transformer greater than 100 kV or generator greater than	N/A	N/A	N/A	The Transmission Operator failed to provide outage information, in accordance with its Reliability Coordinators established outage reporting requirement, to its Reliability Coordinator, and to affected Balancing Authorities and Transmission Operators for scheduled generator and bulk transmission outages planned for the

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		50 MW) that may collectively cause or contribute to an SOL or IROL violation or a regional operating area limitation. The Reliability Coordinator shall establish the outage reporting requirements.				next day (any foreseen outage of a transmission line or transformer greater than 100 kV or generator greater than 50 MW) that may collectively cause or contribute to an SOL or IROL violation or a regional operating area limitation. OR The Reliability Coordinator failed to establish the outage reporting requirements.
TOP-003-0	R1.3.	Such information shall be available by 1200 Central Standard Time for the Eastern Interconnection and 1200 Pacific Standard Time for the Western Interconnection.	The responsible entity failed to provide the information by 1200 Central Standard Time for the Eastern Interconnection or 1200 Pacific Standard Time for the Western Interconnection but did provide the information by 1230 for the applicable interconnection.	The responsible entity failed to provide the information by 1230 Central Standard Time for the Eastern Interconnection or 1230 Pacific Standard Time for the Western Interconnection but did provide the information by 1300 for the applicable interconnection.	The responsible entity failed to provide the information by 1300 Central Standard Time for the Eastern Interconnection or 1300 Pacific Standard Time for the Western Interconnection but did provide the information by 1330 for the applicable interconnection.	The responsible entity failed to provide the information by 1330 Central Standard Time for the Eastern Interconnection or 1330 Pacific Standard Time for the Western Interconnection.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
TOP-003-0	R2.	Each Transmission Operator, Balancing Authority, and Generator Operator shall plan and coordinate scheduled outages of system voltage regulating equipment, such as automatic voltage regulators on generators, supplementary excitation control, synchronous condensers, shunt and series capacitors, reactors, etc., among affected Balancing Authorities and Transmission Operators as required.	N/A	N/A	N/A	The responsible entity failed to plan or coordinate scheduled outages of system voltage regulating equipment, such as automatic voltage regulators on generators, supplementary excitation control, synchronous condensers, shunt and series capacitors, reactors, etc., among affected Balancing Authorities and Transmission Operators when required.
TOP-003-0	R3.	Each Transmission Operator, Balancing Authority, and Generator Operator shall plan and coordinate scheduled outages of telemetering and control equipment and associated communication channels between the affected areas.	N/A	N/A	The responsible entity planned scheduled outages of telemetering and control equipment and associated communication channels but failed to coordinate between the affected areas.	The responsible entity failed to plan and coordinate scheduled outages of telemetering and control equipment and associated communication channels between the affected areas.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
TOP-003-0	R4.	Each Reliability Coordinator shall resolve any scheduling of potential reliability conflicts.	N/A	N/A	N/A	The Reliability Coordinator failed to resolve any scheduling of potential reliability conflicts.
TOP-004-2	R1.	Each Transmission Operator shall operate within the Interconnection Reliability Operating Limits (IROLs) and System Operating Limits (SOLs).	N/A	N/A	N/A	The Transmission Operator failed to operate within the Interconnection Reliability Operating Limits (IROLs) and System Operating Limits (SOLs).
TOP-004-2	R2.	Each Transmission Operator shall operate so that instability, uncontrolled separation, or cascading outages will not occur as a result of the most severe single contingency.	N/A	N/A	N/A	The Transmission Operator failed to operate so that instability, uncontrolled separation, or cascading outages would not occur as a result of the most severe single contingency.
TOP-004-2	R3.	Each Transmission Operator shall operate to protect against instability, uncontrolled separation, or cascading outages resulting from multiple outages, as specified by its Reliability Coordinator.	N/A	N/A	N/A	The Transmission Operator failed to operate to protect against instability, uncontrolled separation, or cascading outages resulting from multiple outages, as specified by Reliability Coordinator

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						policy.
TOP-004-2	R4.	If a Transmission Operator enters an unknown operating state (i.e., any state for which valid operating limits have not been determined), it will be considered to be in an emergency and shall restore operations to respect proven reliable power system limits within 30 minutes.	N/A	N/A	N/A	The Transmission Operator entered an unknown operating state (i.e., any state for which valid operating limits have not been determined), and failed to restore operations to respect proven reliable power system limits for more than 30 minutes.
TOP-004-2	R5.	Each Transmission Operator shall make every effort to remain connected to the Interconnection. If the Transmission Operator determines that by remaining interconnected, it is in imminent danger of violating an IROL or SOL, the Transmission Operator may take such actions, as it deems necessary, to protect its area.	N/A	N/A	N/A	The Transmission Operator did not make every effort to remain connected to the Interconnection except when the Transmission Operator determined that by remaining interconnected, it was in imminent danger of violating an IROL or SOL.
TOP-004-2	R6.	Transmission Operators, individually and jointly with other Transmission	The Transmission Operator, individually and jointly with other	The Transmission Operator, individually and jointly with other	The Transmission Operator, individually and jointly with other	The Transmission Operator, failed to develop, maintain, and implemented formal

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Operators, shall develop, maintain, and implement formal policies and procedures to provide for transmission reliability. These policies and procedures shall address the execution and coordination of activities that impact inter- and intra-Regional reliability, including:	Transmission Operators, developed, maintained, and implemented formal policies and procedures to provide for transmission reliability, addressing the execution and coordination of activities that impact inter- and intra-Regional reliability, but failed to include information required by one of the subrequirements R6.1 thru R6.4	Transmission Operators, developed, maintained, and implemented formal policies and procedures to provide for transmission reliability, addressing the execution and coordination of activities that impact inter- and intra-Regional reliability, but failed to include information required by 2 of the subrequirements R6.1 thru R6.4.	Transmission Operators, developed, maintained, and implemented formal policies and procedures to provide for transmission reliability, addressing the execution and coordination of activities that impact inter- and intra-Regional reliability, but failed to include information required by 3 of the subrequirements R6.1 thru R6.4.	policies and procedures to provide for transmission reliability, addressing the execution and coordination of activities that impact inter- and intra-Regional reliability. If formal policies and procedures were developed, such policies and procedures failed to include any of the information required in subrequirements R6.1 thru R6.4.
TOP-004-2	R6.1.	Monitoring and controlling voltage levels and real and reactive power flows.	N/A	N/A	N/A	N/A
TOP-004-2	R6.2.	Switching transmission elements.	N/A	N/A	N/A	N/A
TOP-004-2	R6.3.	Planned outages of transmission elements.	N/A	N/A	N/A	N/A
TOP-004-2	R6.4.	Responding to IROL and SOL violations.	N/A	N/A	N/A	N/A
TOP-005-1.1	R2.	As a condition of	N/A	N/A	N/A	The ISN data recipient

Violation Severity Level Matrix (TOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		receiving data from the Interregional Security Network (ISN), each ISN data recipient shall sign the NERC Confidentiality Agreement for "Electric System Reliability Data."				failed to sign the NERC Confidentiality Agreement for "Electric System Reliability Data".
TOP-006-1	R1.	Each Transmission Operator and Balancing Authority shall know the status of all generation and transmission resources available for use.	N/A	N/A	N/A	The responsible entity failed to know the status of all generation and transmission resources available for use, even though said information was reported by the Generator Operator, Transmission Operator, or Balancing Authority.
TOP-006-1	R1.1.	Each Generator Operator shall inform its Host Balancing Authority and the Transmission Operator of all generation resources available for use.	N/A	N/A	N/A	The Generator Operator failed to inform its Host Balancing Authority and the Transmission Operator of all generation resources available for use.
TOP-006-1	R1.2.	Each Transmission Operator and Balancing Authority shall inform the Reliability Coordinator and other affected Balancing	N/A	N/A	N/A	The responsible entity failed to inform the Reliability Coordinator and other affected Balancing Authorities and Transmission

Violation Severity Level Matrix (TOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Authorities and Transmission Operators of all generation and transmission resources available for use.				Operators of all generation and transmission resources available for use.
TOP-006-1	R3.	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide appropriate technical information concerning protective relays to their operating personnel.	The responsible entity failed to provide 5% or less of the appropriate technical information concerning protective relays to its operating personnel.	The responsible entity failed to provide more than 5% up to (and including) 10% of the appropriate technical information concerning protective relays to its operating personnel.	The responsible entity failed to provide more than 10% up to (and including) 15% of the appropriate technical information concerning protective relays to its operating personnel.	The responsible entity failed to provide more than 15% of the appropriate technical information concerning protective relays to its operating personnel.
TOP-006-1	R6.	Each Balancing Authority and Transmission Operator shall use sufficient metering of suitable range, accuracy and sampling rate (if applicable) to ensure accurate and timely monitoring of operating conditions under both normal and emergency situations.	N/A	N/A	N/A	The responsible entity failed to use sufficient metering of suitable range, accuracy and sampling rate (if applicable) to ensure accurate and timely monitoring of operating conditions under both normal and emergency situations.
TOP-006-1	R7.	Each Reliability Coordinator, Transmission Operator,	N/A	N/A	N/A	The responsible entity failed to monitor system frequency.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		and Balancing Authority shall monitor system frequency.				
TOP-007-0	R1.	A Transmission Operator shall inform its Reliability Coordinator when an IROL or SOL has been exceeded and the actions being taken to return the system to within limits.	N/A	N/A	The Transmission Operator informed its Reliability Coordinator when an IROL or SOL had been exceeded but failed to provide the actions being taken to return the system to within limits.	The Transmission Operator failed to inform its Reliability Coordinator when an IROL or SOL had been exceeded.
TOP-007-0	R2.	Following a Contingency or other event that results in an IROL violation, the Transmission Operator shall return its transmission system to within IROL as soon as possible, but not longer than 30 minutes.	Following a Contingency or other event that resulted in an IROL violation of a magnitude of 5% or less, the Transmission Operator failed to return its transmission system to within the IROL in less than or equal to 35 minutes.	Following a Contingency or other event that resulted in an IROL violation, the Transmission Operator failed to return its transmission system to within the IROL in accordance with the following: (a) an IROL with a magnitude of 5% or less for a period of time greater than 35 minutes but less than or equal to 45 minutes, or (b) an IROL with a	Following a Contingency or other event that resulted in an IROL violation, the Transmission Operator failed to return its transmission system to within the IROL in accordance with the following: (a) an IROL with a magnitude of 5% or less for a period of time greater than 45 minutes, or (b) an IROL with a magnitude of more than 5% up to (and	Following a Contingency or other event that resulted in an IROL violation, the Transmission Operator failed to return its transmission system to within the IROL in accordance with the following: (a) an IROL with a magnitude of more than 10% up to (and including) 15% for a period of time greater than 45 minutes, or (b) an IROL with a magnitude of more than 15% up to (and including) 20% for a

Violation Severity Level Matrix (TOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				magnitude of more than 5% up to (and including) 10% for a period of time less than or equal to 40 minutes, or (c) an IROL with a magnitude of more than 10% up to (and including) 15% for a period of time less than or equal to 35 minutes.	including) 10% for a period of time greater than 40 minutes, or (c) an IROL with a magnitude of more than 10% up to (and including) 15% for a period of time greater than 35 minutes but less than or equal to 45 minutes, or (d) an IROL with a magnitude of more than 15% up to (and including) 20% for a period of time less than or equal to 40 minutes, or (e) an IROL with a magnitude of more than 20% up to (and including) 25% for a period of time less than or equal to 35 minutes.	period of time greater than 40 minutes, or (c) an IROL with a magnitude of more than 20% up to (and including) 25% for a period of time greater than 35 minutes, or (d) an IROL with a magnitude of more than 25% for a period of greater than 30 minutes.
TOP-008-1	R1.	The Transmission Operator experiencing or contributing to an IROL or SOL violation shall take immediate steps to relieve the condition, which may	N/A	N/A	N/A	The Transmission Operator experiencing or contributing to an IROL or SOL violation failed to take immediate steps to relieve the condition,

Violation Severity Level Matrix (TOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		include shedding firm load.				which may have included shedding firm load.
TOP-008-1	R2.	Each Transmission Operator shall operate to prevent the likelihood that a disturbance, action, or inaction will result in an IROL or SOL violation in its area or another area of the Interconnection. In instances where there is a difference in derived operating limits, the Transmission Operator shall always operate the Bulk Electric System to the most limiting parameter.	N/A	N/A	The Transmission Operator operated to prevent the likelihood that a disturbance, action, or inaction would result in an IROL or SOL violation in its area or another area of the Interconnection but failed to operate the Bulk Electric System to the most limiting parameter in instances where there was a difference in derived operating limits.	The Transmission Operator failed to operate to prevent the likelihood that a disturbance, action, or inaction would result in an IROL or SOL violation in its area or another area of the Interconnection.
TOP-008-1	R3.	The Transmission Operator shall disconnect the affected facility if the overload on a transmission facility or abnormal voltage or reactive condition persists and equipment is endangered. In doing so, the Transmission	N/A	N/A	The Transmission Operator disconnected the affected facility when the overload on a transmission facility or abnormal voltage or reactive condition persisted and equipment was endangered but	The Transmission Operator failed to disconnect the affected facility when the overload on a transmission facility or abnormal voltage or reactive condition persisted and equipment was endangered.

Violation Severity Level Matrix (TOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Operator shall notify its Reliability Coordinator and all neighboring Transmission Operators impacted by the disconnection prior to switching, if time permits, otherwise, immediately thereafter.			failed to notify its Reliability Coordinator and all neighboring Transmission Operators impacted by the disconnection either prior to switching, if time permitted, otherwise, immediately thereafter.	

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
TPL-001-0.1	R2.	When system simulations indicate an inability of the systems to respond as prescribed in Reliability Standard TPL-001-0_R1, the Planning Authority and Transmission Planner shall each:	N/A	The responsible entity has failed to review the continuing need for previously identified facility additions through subsequent annual assessments. (R2.2)	The responsible entity provided documented evidence of corrective action plans in order to satisfy Category A planning requirements, but failed to include an implementation schedule with in-service dates (R2.1.1 and R2.1.2) OR The responsible entity failed to consider necessary lead times to implement its corrective action plan. (R2.1.3)	The responsible entity has failed to provide documented evidence of corrective action plans in order to satisfy Category A planning requirements. (R2.1)
TPL-001-0.1	R2.1.	Provide a written summary of its plans to achieve the required system performance as described above throughout the planning horizon.	N/A	N/A	N/A	N/A
TPL-001-0.1	R2.1.1.	Including a schedule for implementation.	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
TPL-001-0.1	R2.1.2.	Including a discussion of expected required in-service dates of facilities.	N/A	N/A	N/A	N/A
TPL-001-0.1	R2.1.3.	Consider lead times necessary to implement plans.	N/A	N/A	N/A	N/A
TPL-001-0.1	R2.2.	Review, in subsequent annual assessments, (where sufficient lead time exists), the continuing need for identified system facilities. Detailed implementation plans are not needed.	N/A	N/A	N/A	N/A
TPL-001-0.1	R3.	The Planning Authority and Transmission Planner shall each document the results of these reliability assessments and corrective plans and shall annually provide these to its respective NERC Regional Reliability Organization(s), as required by the Regional Reliability	N/A	The responsible entity documented the results of its reliability assessments and corrective plans but did not annually provide them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability Organization	N/A	The responsible entity DID NOT document the results of its annual reliability assessments and corrective plans AND did not annually provide them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability

Violation Severity Level Matrix (TPL)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Organization.				Organization
TPL-002-0	R2.	When System simulations indicate an inability of the systems to respond as prescribed in Reliability Standard TPL-002-0_R1, the Planning Authority and Transmission Planner shall each:	N/A	The responsible entity has failed to review the continuing need for previously identified facility additions through subsequent annual assessments. (R2.2)	The responsible entity provided documented evidence of corrective action plans in order to satisfy Category B planning requirements, but failed to include a implementation schedule with in-service dates (R2.1.1 and R2.1.2) OR The responsible entity failed to consider necessary lead times to implement its corrective action plan. (R2.1.3)	The responsible entity has failed to provide documented evidence of corrective action plans in order to satisfy Category B planning requirements. (R2.1)
TPL-002-0	R2.1.	Provide a written summary of its plans to achieve the required system performance as described above throughout the planning horizon:	N/A	N/A	N/A	N/A
TPL-002-0	R2.1.1.	Including a schedule for implementation.	N/A	N/A	N/A	N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
TPL-002-0	R2.1.2.	Including a discussion of expected required in-service dates of facilities.	N/A	N/A	N/A	N/A
TPL-002-0	R2.1.3.	Consider lead times necessary to implement plans.	N/A	N/A	N/A	N/A
TPL-002-0	R2.2.	Review, in subsequent annual assessments, (where sufficient lead time exists), the continuing need for identified system facilities. Detailed implementation plans are not needed.	N/A	N/A	N/A	N/A
TPL-002-0	R3.	The Planning Authority and Transmission Planner shall each document the results of its Reliability Assessments and corrective plans and shall annually provide the results to its respective Regional Reliability Organization(s), as required by the Regional Reliability	N/A	The responsible entity documented the results of its reliability assessments and corrective plans but did not annually provide them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability Organization.	N/A	The responsible entity DID NOT document the results of its annual reliability assessments and corrective plans AND did not annually provide them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability

Violation Severity Level Matrix (TPL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Organization.				Organization.
TPL-003-0	R2.	When system simulations indicate an inability of the systems to respond as prescribed in Reliability Standard TPL-003-0_R1, the Planning Authority and Transmission Planner shall each:	N/A	The responsible entity has failed to review the continuing need for previously identified facility additions through subsequent annual assessments. (R2.2)	The responsible entity provided documented evidence of corrective action plans in order to satisfy Category C planning requirements, but failed to include an implementation schedule with in-service dates. (R2.1.1 and R2.1.2) OR The responsible entity failed to consider necessary lead times to implement its corrective action plan. (R2.1.3)	The responsible entity has failed to provide documented evidence of corrective action plans in order to satisfy Category C planning requirements. (R2.1)
TPL-003-0	R2.1.	Provide a written summary of its plans to achieve the required system performance as described above throughout the planning horizon:	N/A	N/A	N/A	N/A
TPL-003-0	R2.1.1.	Including a schedule for implementation.	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (TPL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
TPL-003-0	R2.1.2.	Including a discussion of expected required in-service dates of facilities.	N/A	N/A	N/A	N/A
TPL-003-0	R2.1.3.	Consider lead times necessary to implement plans.	N/A	N/A	N/A	N/A
TPL-003-0	R2.2.	Review, in subsequent annual assessments, (where sufficient lead time exists), the continuing need for identified system facilities. Detailed implementation plans are not needed.	N/A	N/A	N/A	N/A
TPL-003-0	R3.	The Planning Authority and Transmission Planner shall each document the results of these Reliability Assessments and corrective plans and shall annually provide these to its respective NERC Regional Reliability Organization(s), as required by the Regional Reliability	N/A	The responsible entity documented the results of its reliability assessments and corrective plans but did not annually provide them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability Organization.	N/A	The responsible entity DID NOT document the results of its annual reliability assessments and corrective plans AND did not annually provide them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability

Violation Severity Level Matrix (TPL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Organization.				Organization.
TPL-004-0	R1.	The Planning Authority and Transmission Planner shall each demonstrate through a valid assessment that its portion of the interconnected transmission system is evaluated for the risks and consequences of a number of each of the extreme contingencies that are listed under Category D of Table I. To be valid, the Planning Authority's and Transmission Planner's assessment shall:	The responsible entity is non-compliant with one of the sub-components of requirement R1.3 (R1.3.1 through R1.3.9). OR The responsible entity has considered the NERC Category D contingencies applicable to their system, but was deficient with respect to 5% or less of all applicable contingencies. (R1.4)	The responsible entity is non-compliant with two of the sub-components of requirement R1.3 (R1.3.1 through 1.3.9). OR The responsible entity has considered the NERC Category D contingencies applicable to their system, but was deficient with respect to more than 5% up to (and including) 10% of all applicable contingencies. (R1.4)	The responsible entity is non-compliant with three of the sub-components of requirement R1.3 (R1.3.1 through 1.3.9). OR The responsible entity has considered the NERC Category D contingencies applicable to their system, but was deficient with respect to more than 10% up to (and including) 15% of all applicable contingencies. (R1.4)	The responsible entity did not perform the transmission assessments annually. (R1.1) OR The responsible entity has failed to demonstrate a valid assessment for the near-term planning period. (R1.2) OR The responsible entity is non-compliant with four or more of the sub-components of requirement R1.3 (R1.3.1 through 1.3.9). OR The responsible entity has considered the NERC Category D contingencies applicable to its system, but was deficient with respect to more than 15% of all

Violation Severity Level Matrix (TPL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						applicable contingencies. (R1.4)
TPL-004-0	R1.1.	Be made annually.	N/A	N/A	N/A	N/A
TPL-004-0	R1.2.	Be conducted for near-term (years one through five).	N/A	N/A	N/A	N/A
TPL-004-0	R1.3.	Be supported by a current or past study and/or system simulation testing that addresses each of the following categories, showing system performance following Category D contingencies of Table I. The specific elements selected (from within each of the following categories) for inclusion in these studies and simulations shall be acceptable to the associated Regional Reliability Organization(s).	N/A	N/A	N/A	N/A
TPL-004-0	R1.3.1.	Be performed and evaluated only for those Category D	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (TPL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		contingencies that would produce the more severe system results or impacts. The rationale for the contingencies selected for evaluation shall be available as supporting information. An explanation of why the remaining simulations would produce less severe system results shall be available as supporting information.				
TPL-004-0	R1.3.2.	Cover critical system conditions and study years as deemed appropriate by the responsible entity.	N/A	N/A	N/A	N/A
TPL-004-0	R1.3.3.	Be conducted annually unless changes to system conditions do not warrant such analyses.	N/A	N/A	N/A	N/A
TPL-004-0	R1.3.4.	Have all projected firm transfers modeled.	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (TPL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
TPL-004-0	R1.3.5.	Include existing and planned facilities.	N/A	N/A	N/A	N/A
TPL-004-0	R1.3.6.	Include Reactive Power resources to ensure that adequate reactive resources are available to meet system performance.	N/A	N/A	N/A	N/A
TPL-004-0	R1.3.7.	Include the effects of existing and planned protection systems, including any backup or redundant systems.	N/A	N/A	N/A	N/A
TPL-004-0	R1.3.8.	Include the effects of existing and planned control devices.	N/A	N/A	N/A	N/A
TPL-004-0	R1.3.9.	Include the planned (including maintenance) outage of any bulk electric equipment (including protection systems or their components) at those demand levels for which planned (including maintenance) outages are performed.	N/A	N/A	N/A	N/A
TPL-004-0	R1.4.	Consider all contingencies	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (TPL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		applicable to Category D.				
TPL-004-0	R2.	The Planning Authority and Transmission Planner shall each document the results of its reliability assessments and shall annually provide the results to its entities' respective NERC Regional Reliability Organization(s), as required by the Regional Reliability Organization.	N/A	The responsible entity documented the results of its reliability assessments but did not annually provide them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability Organization.	N/A	The responsible entity DID NOT document the results of its annual reliability assessments AND did not annually provide them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability Organization.

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
VAR-001-1	R1.	Each Transmission Operator, individually and jointly with other Transmission Operators, shall ensure that formal policies and procedures are developed, maintained, and implemented for monitoring and controlling voltage levels and Mvar flows within their individual areas and with the areas of neighboring Transmission Operators.	N/A	The Transmission Operator has formal policies and procedures for monitoring and controlling voltage and MVAR flows, but they are not current.	The Transmission Operator has formal policies and procedures for monitoring and controlling voltage and MVAR flows that are current, but they have not been coordinated with one or more neighboring Transmission Operators.	The Transmission Operator has formal policies and procedures for monitoring and controlling voltage and MVAR flows, but has not implemented them. OR The Transmission Operator does not have formal policies and procedures for monitoring and controlling voltage and MVAR flows.
VAR-001-1	R3.	The Transmission Operator shall specify criteria that exempts generators from compliance with the requirements defined in Requirement 4, and Requirement 6.1.	N/A	N/A	N/A	The Transmission Operator did not specify criteria that exempted generators from compliance with the requirements defined in Requirement R4, and Requirement R6.1.
VAR-001-1	R6.1.	When notified of the loss of an automatic	N/A	N/A	N/A	The Transmission Operator has not

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		voltage regulator control, the Transmission Operator shall direct the Generator Operator to maintain or change either its voltage schedule or its Reactive Power schedule.				provided evidence to show that directives were issued to the Generator Operator to maintain or change either its voltage schedule or its Reactive Power schedule in accordance with R6.1.
VAR-001-1	R11.	After consultation with the Generator Owner regarding necessary step-up transformer tap changes, the Transmission Operator shall provide documentation to the Generator Owner specifying the required tap changes, a timeframe for making the changes, and technical justification for these changes.	N/A	The Transmission Operator provided documentation to the Generator Owner specifying required step-up transformer tap changes and a timeframe for making these changes, but failed to provide technical justification for these changes.	The Transmission Operator provided documentation to the Generator Owner specifying required step-up transformer tap changes, but failed to provide a timeframe for making these changes and technical justification for these changes.	The Transmission Operator failed to provide documentation to the Generator Owner specifying required step-up transformer tap changes, a timeframe for making these changes, and technical justification for these changes.
VAR-001-1	R12.	The Transmission Operator shall direct corrective action, including load	N/A	N/A	N/A	The Transmission Operator has failed to direct corrective action, including

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		reduction, necessary to prevent voltage collapse when reactive resources are insufficient.				load reduction, necessary to prevent voltage collapse when reactive resources are insufficient.
VAR-002-1.1a	R1.	The Generator Operator shall operate each generator connected to the interconnected transmission system in the automatic voltage control mode (automatic voltage regulator in service and controlling voltage) unless the Generator Operator has notified the Transmission Operator.	N/A	N/A	N/A	The responsible entity did not operate each generator in the automatic voltage control mode and failed to notify the Transmission Operator as identified in R1.
VAR-002-1.1a	R2.	Unless exempted by the Transmission Operator, each Generator Operator shall maintain the generator voltage or Reactive Power output (within applicable Facility Ratings. [1] as directed by the Transmission	When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator Operator failed to meet the directed values by 5% or less.	When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator Operator failed to meet the directed values by more than 5% up to (and including) 10% OR	When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator Operator failed to meet the directed values by more than 10% up to (and including) 15%	When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator Operator failed to meet the directed values by more than 15%. OR When a generator's

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Operator		When a generator's automatic voltage regulator is out of service, the Generator Operator failed to use an alternative method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule directed by the Transmission Operator. OR The Generator Operator failed to provide an explanation of why the voltage schedule could not be met.		automatic voltage regulator is out of service, the Generator Operator failed to use an alternative method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule directed by the Transmission Operator and the Generator Operator failed to provide an explanation of why the voltage schedule could not be met.
VAR-002-1.1a	R2.1.	When a generator's automatic voltage regulator is out of service, the Generator Operator shall use an alternative method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		directed by the Transmission Operator.				
VAR-002-1.1a	R2.2.	When directed to modify voltage, the Generator Operator shall comply or provide an explanation of why the schedule cannot be met.	N/A	N/A	N/A	N/A
VAR-002-1.1a	R3.	Each Generator Operator shall notify its associated Transmission Operator as soon as practical, but within 30 minutes of any of the following:	N/A	N/A	The Generator Operator failed to notify the Transmission Operator within 30 minutes of the information as specified in either R3.1 or R3.2	The Generator Operator failed to notify the Transmission Operator within 30 minutes of the information as specified in both R3.1 and R3.2
VAR-002-1.1a	R3.1.	A status or capability change on any generator Reactive Power resource, including the status of each automatic voltage regulator and power system stabilizer and the expected duration of the change in status or capability.	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
VAR-002-1.1a	R3.2.	A status or capability change on any other Reactive Power resources under the Generator Operator's control and the expected duration of the change in status or capability.	N/A	N/A	N/A	N/A
VAR-002-1.1a	R4.	The Generator Owner shall provide the following to its associated Transmission Operator and Transmission Planner within 30 calendar days of a request.	The Responsible entity failed to provide to its associated Transmission Operator and Transmission Planner one of the types of data as specified in R4.1.1 or R 4.1.2 or 4.1.3 or 4.1.4 OR The information was provided in more than 30, but less than or equal to 35 calendar days of the request.	The Responsible entity failed to provide to its associated Transmission Operator and Transmission Planner two of the types of data as specified in R4.1.1 or R 4.1.2 or 4.1.3 or 4.1.4 OR The information was provided in more than 35, but less than or equal to 40 calendar days of the request.	The Responsible entity failed to provide to its associated Transmission Operator and Transmission Planner three of the types of data as specified in R4.1.1 or R 4.1.2 or 4.1.3 or 4.1.4 OR The information was provided in more than 40, but less than or equal to 45 calendar days of the request.	The Responsible entity failed to provide to its associated Transmission Operator and Transmission Planner any of the types of data as specified in R4.1.1 and R 4.1.2 and 4.1.3 and 4.1.4 OR The information was provided in more than 45 calendar days of the request.
VAR-002-1.1a	R4.1.	For generator step-up transformers and auxiliary transformers with primary voltages	N/A	N/A	N/A	N/A

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		equal to or greater than the generator terminal voltage:				
VAR-002-1.1a	R4.1.1.	Tap settings.	N/A	N/A	N/A	N/A
VAR-002-1.1a	R4.1.2.	Available fixed tap ranges.	N/A	N/A	N/A	N/A
VAR-002-1.1a	R4.1.3.	Impedance data.	N/A	N/A	N/A	N/A
VAR-002-1.1a	R4.1.4.	The +/- voltage range with step-change in % for load-tap changing transformers.	N/A	N/A	N/A	N/A
VAR-002-1.1a	R5.	After consultation with the Transmission Operator regarding necessary step-up transformer tap changes, the Generator Owner shall ensure that transformer tap positions are changed according to the specifications provided by the Transmission Operator, unless such action would violate safety, an equipment rating, a regulatory requirement, or a	N/A	N/A	N/A	The responsible entity failed to ensure that transformer tap positions were changed according to the specifications provided by the Transmission Operator when said actions would not have violated safety, an equipment rating, a regulatory requirement, or a statutory requirement.

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		statutory requirement.				
VAR-002-1.1a	R5.1.	If the Generator Operator can't comply with the Transmission Operator's specifications, the Generator Operator shall notify the Transmission Operator and shall provide the technical justification.	N/A	N/A	N/A	The responsible entity failed to notify the Transmission Operator and to provide technical justification.

Exhibit B — Redline VSLs Proposed for Approval

Violation Severity Levels Matrix

Redline Version of VSLs Submitted for Approval

Violation Severity Level Matrix (BAL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
BAL-001-0.1a	R1.	Each Balancing Authority shall operate such that, on a rolling 12-month basis, the average of the clock-minute averages of the Balancing Authority's Area Control Error (ACE) divided by 10B (B is the clock-minute average of the Balancing Authority Area's Frequency Bias) times the corresponding clock-minute averages of the Interconnection's Frequency Error is less than a specific limit. This limit is a constant derived from a targeted frequency bound (separately calculated for each Interconnection) that is reviewed and set as necessary by the NERC Operating Committee. ***See Standard for Formula.***	The Balancing Authority Area's value of CPS1 is less than 100% but greater than or equal to 95%.	The Balancing Authority Area's value of CPS1 is less than 95% but greater than or equal to 90%.	The Balancing Authority Area's value of CPS1 is less than 90% but greater than or equal to 85%.	The Balancing Authority Area's value of CPS1 is less than 85%.

Violation Severity Level Matrix (BAL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
BAL-001-0.1a	R2.	Each Balancing Authority shall operate such that its average ACE for at least 90% of clock-ten-minute periods (6 non-overlapping periods per hour) during a calendar month is within a specific limit, referred to as L_{10}. ***See Standard for Formula.***	The Balancing Authority Area's value of CPS2 is less than 90% but greater than or equal to 85%.	The Balancing Authority Area's value of CPS2 is less than 85% but greater than or equal to 80%.	The Balancing Authority Area's value of CPS2 is less than 80% but greater than or equal to 75%.	The Balancing Authority Area's value of CPS2 is less than 75%.
BAL-001-0.1a	R3.	Each Balancing Authority providing Overlap Regulation Service shall evaluate Requirement R1 (i.e., Control Performance Standard 1 or CPS1) and Requirement R2 (i.e., Control Performance Standard 2 or CPS2) using the characteristics of the combined ACE and combined Frequency Bias Settings.	N/A	N/A	N/A	The Balancing Authority providing Overlap Regulation Service failed to use a combined ACE and frequency bias.
BAL-002-0	R1.	Each Balancing Authority shall have access to and/or operate Contingency	N/A	N/A	~~N/A~~The Balancing Authority did not operate Contingency Reserve to respond	The Balancing Authority ~~does~~did not have access to ~~and/or operate~~

Violation Severity Level Matrix (BAL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Reserve to respond to Disturbances. Contingency Reserve may be supplied from generation, controllable load resources, or coordinated adjustments to Interchange Schedules.			to a Disturbance.	Contingency Reserve to respond to ~~Disturbances.~~a Disturbance.
BAL-002-0	R1.1.	A Balancing Authority may elect to fulfill its Contingency Reserve obligations by participating as a member of a Reserve Sharing Group. In such cases, the Reserve Sharing Group shall have the same responsibilities and obligations as each Balancing Authority with respect to monitoring and meeting the requirements of Standard BAL-002.	N/A	N/A	N/A	The Balancing Authority has elected to fulfill its Contingency Reserve obligations by participating as a member of a Reserve Sharing Group and the Reserve Sharing Group has not provided the same responsibilities and obligations as required of the responsible entity with respect to monitoring and meeting the requirements of Standard BAL-002.
BAL-002-0	R3.	Each Balancing Authority or Reserve Sharing Group shall	The Balancing Authority or Reserve Sharing Group's	The Balancing Authority or Reserve Sharing Group's	The Balancing Authority or Reserve Sharing Group's	The Balancing Authority or Reserve Sharing Group's

Violation Severity Level Matrix (BAL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		activate sufficient Contingency Reserve to comply with the DCS.	~~Average Percent Recovery~~average percent recovery per the NERC DCS quarterly report was less than 100% but greater than or equal to 95%. OR The Balancing Authority or Reserve Sharing Group failed to review its probable contingencies to determine its prospective most severe single contingencies annually as specified in R3.1.	~~Average Percent Recovery~~average percent recovery per the NERC DCS quarterly report was less than 95% but greater than or equal to 90%.	~~Average Percent Recovery~~average percent recovery per the NERC DCS quarterly report was less than 90% but greater than or equal to 85%.	~~Average Percent Recovery~~average percent recovery per the NERC DCS quarterly report was less than 85%. OR The Balancing Authority or Reserve Sharing Group failed to carry at least enough Contingency Reserve to cover the most severe single contingency as specified in R3.1.
BAL-002-0	R3.1.	As a minimum, the Balancing Authority or Reserve Sharing Group shall carry at least enough Contingency Reserve to cover the most severe single contingency. All Balancing Authorities and Reserve Sharing Groups shall review, no less frequently than annually, their	~~The Balancing Authority or Reserve Sharing Group failed to review their probable contingencies to determine their prospective most severe single contingencies annually.~~ N/A	N/A	N/A	~~The Balancing Authority or Reserve Sharing Group failed to carry at least enough Contingency Reserve to cover the most severe single contingency.~~ N/A

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		probable contingencies to determine their prospective most severe single contingencies.				
BAL-002-0	R4.1.	A Balancing Authority shall return its ACE to zero if its ACE just prior to the Reportable Disturbance was positive or equal to zero. For negative initial ACE values just prior to the Disturbance, the Balancing Authority shall return ACE to its pre-Disturbance value.	N/A	N/A	N/A	~~The Balancing Authority failed to return its ACE to zero if its ACE just prior to the Reportable Disturbance was positive or equal to zero or for negative initial ACE values failed to return ACE to its pre-Disturbance value.~~N/A
BAL-002-0	R4.2.	The default Disturbance Recovery Period is 15 minutes after the start of a Reportable Disturbance. This period may be adjusted to better suit the needs of an Interconnection based on analysis approved by the NERC Operating Committee.	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (BAL)

Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
BAL-002-0	R5.1.	The Reserve Sharing Group reviews group ACE (or equivalent) and demonstrates compliance to the DCS. To be in compliance, the group ACE (or its equivalent) must meet the Disturbance Recovery Criterion after the schedule change(s) related to reserve sharing have been fully implemented, and within the Disturbance Recovery Period.	N/A	N/A	N/A	N/A
BAL-002-0	R5.2.	The Reserve Sharing Group reviews each member's ACE in response to the activation of reserves. To be in compliance, a member's ACE (or its equivalent) must meet the Disturbance Recovery Criterion after the schedule change(s) related to reserve sharing have	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (BAL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		been fully implemented, and within the Disturbance Recovery Period.				
BAL-002-0	R6.	A Balancing Authority or Reserve Sharing Group shall fully restore its Contingency Reserves within the Contingency Reserve Restoration Period for its Interconnection.	The Balancing Authority or Reserve Sharing Group ~~restored~~failed to restore 5% or less ~~than 100% but greater than 90%~~ of its contingency reserves during the Contingency Reserve Restoration Period.	The Balancing Authority or Reserve Sharing Group ~~restored less~~failed to restore more than ~~or equal to 90% but greater than 80%~~5% up to (and including) 10% of its contingency reserves during the Contingency Reserve Restoration Period.	The Balancing Authority or Reserve Sharing Group ~~restored less~~failed to restore more than ~~or equal to 80% but greater than or equal~~10% up to ~~70%~~(and including) 15% of its Contingency Reserve during the Contingency Reserve Restoration Period.	The Balancing Authority or Reserve Sharing Group ~~restored less~~failed to restore more than ~~70~~15% of its Contingency Reserves during the Contingency Reserve Restoration Period.
BAL-002-0	R6.1.	The Contingency Reserve Restoration Period begins at the end of the Disturbance Recovery Period.	N/A	N/A	N/A	N/A
BAL-002-0	R6.2.	The default Contingency Reserve Restoration Period is 90 minutes. This period may be adjusted to better suit the reliability targets of the Interconnection based on analysis	N/A	N/A	N/A	N/A

Violation Severity Level Matrix (BAL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		approved by the NERC Operating Committee.				
BAL-003-0.1b	R1.	Each Balancing Authority shall review its Frequency Bias Settings by January 1 of each year and recalculate its setting to reflect any change in the Frequency Response of the Balancing Authority Area.	~~N/A~~The Balancing Authority failed to report the method for determining its Frequency Bias Setting to the NERC Operating Committee.	~~N/A~~The Balancing Authority failed to report its Frequency Bias Setting to the NERC Operating Committee.	The Balancing Authority ~~reviewed its~~ failed to report its Frequency Bias Settings and the method for determining that Frequency Bias Setting and the method for determining that ~~prior January 1, but failed to recalculate its setting to reflect any change in the~~ Frequency ~~Response of the Balancing Authority Area~~Bias Setting to the NERC operating Committee as required in R1.2. ~~,~~	The Balancing Authority failed to review its Frequency Bias Settings ~~prior to~~by January 1~~,~~ of each year and ~~failed to~~ recalculate its setting to reflect any change in the Frequency Response of the Balancing Authority Area.
BAL-003-0.1b	R1.1.	The Balancing Authority may change its Frequency Bias Setting, and the method used to determine the setting, whenever any of the factors used to determine the current bias	N/A	N/A	N/A	~~The Balancing Authority changed its Frequency Bias Setting by changing the method used to determine the setting, without any of the factors used to determine the current bias value changing.~~N/A

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		value change.				
BAL-003-0.1b	R1.2.	Each Balancing Authority shall report its Frequency Bias Setting, and method for determining that setting, to the NERC Operating Committee.	~~The Balancing Authority has not reported its method for calculating frequency bias setting.~~ N/A	~~The Balancing Authority has not reported its frequency bias setting.~~N/A	~~The Balancing Authority has not reported its method for calculating frequency bias and has not reported its frequency bias setting.~~N/A	~~The Balancing Authority has failed to report as directed by the requirement.~~N/A
BAL-003-0.1b	R3.	Each Balancing Authority shall operate its Automatic Generation Control (AGC) on Tie Line Frequency Bias, unless such operation is adverse to system or Interconnection reliability.	N/A	N/A	N/A	The Balancing Authority did not operate its Automatic Generation Control (AGC) on Tie Line Frequency Bias, during periods when such operation would not have been adverse to system or Interconnection reliability.
BAL-003-0.1b	R4.	Balancing Authorities that use Dynamic Scheduling or Pseudo-ties for jointly owned units shall reflect their respective share of the unit governor droop response in their respective Frequency Bias Setting.	N/A	N/A	N/A	The Balancing Authority that used Dynamic Scheduling or Pseudo-ties for jointly owned units did not reflect ~~their~~its respective share of the unit governor droop response in ~~their~~its respective Frequency Bias

Violation Severity Level Matrix (BAL)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						Setting.
BAL-003-0.1b	R4.1.	Fixed schedules for Jointly Owned Units mandate that Balancing Authority (A) that contains the Jointly Owned Unit must incorporate the respective share of the unit governor droop response for any Balancing Authorities that have fixed schedules (B and C). See the diagram below.	N/A	N/A	N/A	The Balancing Authority (A) that contained the Jointly Owned Unit with fixed schedules did not incorporate the respective share of the unit governor droop response for any Balancing Authorities that have fixed schedules (B and C).
BAL-003-0.1b	R4.2.	The Balancing Authorities that have a fixed schedule (B and C) but do not contain the Jointly Owned Unit shall not include their share of the governor droop response in their Frequency Bias Setting. ***See Standard for Graphic***	N/A	N/A	N/A	~~The~~A Balancing ~~Authorities~~Authority that ~~have~~has a fixed schedule (B and C) but ~~do~~does not contain the Jointly Owned Unit~~,~~ included ~~their~~its share of the governor droop response in ~~their~~its Frequency Bias Setting.
BAL-003-0.1b	R5.	Balancing Authorities that serve native load shall have a monthly	N/A	N/A	N/A	The Balancing Authority that served native load failed to have a

Violation Severity Level Matrix (BAL)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		average Frequency Bias Setting that is at least 1% of the Balancing Authority's estimated yearly peak demand per 0.1 Hz change.				monthly average Frequency Bias Setting that was at least 1% of the entities estimated yearly peak demand per 0.1 Hz change.
BAL-003-0.1b	R5.1.	Balancing Authorities that do not serve native load shall have a monthly average Frequency Bias Setting that is at least 1% of its estimated maximum generation level in the coming year per 0.1 Hz change.	N/A	N/A	N/A	The Balancing Authority that does not serve native load did not have a monthly average Frequency Bias Setting that was at least 1% of its estimated maximum generation level in the coming year per 0.1 Hz change.
BAL-004-0	R2.	The Interconnection Time Monitor shall monitor Time Error and shall initiate or terminate corrective action orders in accordance with the NAESB Time Error Correction Procedure.	N/A	N/A	N/A	The ~~RC~~responsible entity serving as the Interconnection Time Monitor failed to initiate or terminate corrective action orders in accordance with the NAESB Time Error Correction Procedure.
BAL-004-0	R4.1.	Balancing Authorities that have reliability concerns with the execution of a Time Error	N/A	N/A	N/A	The Balancing Authority with reliability concerns failed to notify the Reliability

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Correction shall notify their Reliability Coordinator and request the termination of a Time Error Correction in progress.				Coordinator and request the termination of a Time Error Correction in progress.
BAL-005-0.1b	R1.	All generation, transmission, and load operating within an Interconnection must be included within the metered boundaries of a Balancing Authority Area.	N/A	N/A	N/A	N/A
BAL-005-0.1b	R2.	Each Balancing Authority shall maintain Regulating Reserve that can be controlled by AGC to meet the Control Performance Standard.	N/A	N/A	N/A	The Balancing Authority failed to maintain Regulating Reserve that can be controlled by AGC to meet Control Performance Standard.
BAL-005-0.1b	R5.	A Balancing Authority receiving Regulation Service shall ensure that backup plans are in place to provide replacement Regulation Service should the supplying	N/A	N/A	N/A	The Balancing Authority receiving Regulation Service failed to ensure that back-up plans were in place to provide replacement Regulation Service.

Violation Severity Level Matrix (BAL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Balancing Authority no longer be able to provide this service.				
BAL-005-0.1b	R7.	The Balancing Authority shall operate AGC continuously unless such operation adversely impacts the reliability of the Interconnection. If AGC has become inoperative, the Balancing Authority shall use manual control to adjust generation to maintain the Net Scheduled Interchange.	N/A	N/A	N/A	The Balancing Authority failed to operate AGC continuously when there were no adverse impacts~~-~~. OR ~~if their~~ If its AGC was inoperative the Balancing Authority failed to use manual control to adjust generation to maintain the Net Scheduled Interchange.
BAL-005-0.1b	R9.	The Balancing Authority shall include all Interchange Schedules with Adjacent Balancing Authorities in the calculation of Net Scheduled Interchange for the ACE equation.	N/A	N/A	N/A	The Balancing Authority failed to include all ~~Interchanged~~ Interchange Schedules with Adjacent Balancing Authorities in the calculation of Net Scheduled Interchange for the ACE equation.
BAL-005-0.1b	R9.1.	Balancing Authorities with a high voltage direct current (HVDC) link	N/A	N/A	N/A	The Balancing Authority with a high voltage direct current (HVDC) link

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		to another Balancing Authority connected asynchronously to their Interconnection may choose to omit the Interchange Schedule related to the HVDC link from the ACE equation if it is modeled as internal generation or load.				to another Balancing Authority connected asynchronously to ~~their~~its Interconnection chose to omit the Interchange Schedule related to the HVDC link from the ACE equation~~.~~, but failed to model it as internal generation or load.
BAL-005-0.1b	R10.	The Balancing Authority shall include all Dynamic Schedules in the calculation of Net Scheduled Interchange for the ACE equation.	N/A	N/A	N/A	The Balancing Authority failed to include all Dynamic Schedules in the calculation of Net Scheduled Interchange for the ACE equation.
BAL-005-0.1b	R12.1.	Balancing Authorities that share a tie shall ensure Tie Line MW metering is telemetered to both control centers, and emanates from a common, agreed-upon source using common primary metering equipment. Balancing Authorities shall ensure that	~~N/A~~The Balancing Authority failed to ensure 5% or less of all its Tie Line MW metering was telemetered to both control centers and emanates from a common, agreed-upon source OR The Balancing Authority failed to ensure that megawatt-hour data	~~N/A~~The Balancing Authority failed to ensure more than 5% up to (and including) 10% of all its Tie Line MW metering was telemetered to both control centers and emanates from a common, agreed-upon source. OR The Balancing Authority failed to	~~N/A~~The Balancing Authority failed to ensure more than 10% up to (and including) 15% of all its Tie Line MW metering was telemetered to both control centers and emanates from a common, agreed-upon source. OR The Balancing Authority failed to	The Balancing Authority failed to ensure more than 15% of all its Tie Line MW metering was telemetered to both control centers~~,~~ and emanates from a common, agreed-upon source ~~using common primary metering equipment.~~ .

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		megawatt-hour data is telemetered or reported at the end of each hour.	was telemetered or reported for 5% or less of the hours.	ensure that megawatt-hour data was telemetered or reported for more than 5% up to (and including) 10% of the hours.	ensure that megawatt-hour data was telemetered or reported for more than 10% up to (and including) 15% of the hours.	OR The Balancing Authority failed to ensure that megawatt-hour data ~~is~~was telemetered or reported ~~at~~for more than 15% of the ~~end of each hour.~~hours.
BAL-005-0.1b	R12.2.	Balancing Authorities shall ensure the power flow and ACE signals that are utilized for calculating Balancing Authority performance or that are transmitted for Regulation Service are not filtered prior to transmission, except for the Anti-aliasing Filters of Tie Lines.	~~N/A~~The responsible entity did not ensure that 5% or less of the power flow and ACE signals are not filtered except for Anti-aliasing filtering.	~~N/A~~The responsible entity did not ensure that more than 5% up to (and including) 10% of the power flow and ACE signals are not filtered except for Anti-aliasing filtering.	~~N/A~~The responsible entity did not ensure that more than 10% up to (and including) 15% of the power flow and ACE signals are not filtered except for Anti-aliasing filtering.	The ~~Balancing Authority failed to~~responsible entity did not ensure that more than 15% of the power flow and ACE signals ~~that~~ are ~~utilized for calculating Balancing Authority performance or that are transmitted for Regulation Service were~~not filtered ~~prior to transmission,~~ except for ~~the~~ Anti-aliasing ~~Filters of Tie Lines.~~filtering.
BAL-005-0.1b	R12.3.	Balancing Authorities shall install common metering equipment where Dynamic Schedules or Pseudo-Ties are	N/A	N/A	N/A	The ~~Balancing Authority failed to~~applicable entity did not install common metering equipment where Dynamic Schedules

Violation Severity Level Matrix (BAL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		implemented between two or more Balancing Authorities to deliver the output of Jointly Owned Units or to serve remote load.				or Pseudo-Ties ~~were~~are implemented ~~between two or more Balancing Authorities to deliver the output of Jointly Owned Units or to serve remote load~~.
BAL-005-0.1b	R15.	The Balancing Authority shall provide adequate and reliable backup power supplies and shall periodically test these supplies at the Balancing Authority's control center and other critical locations to ensure continuous operation of AGC and vital data recording equipment during loss of the normal power supply.	N/A	N/A	The Balancing Authority failed to periodically test backup power supplies at the Balancing Authority's control center and other critical locations to ensure continuous operation of AGC and vital data recording equipment during loss of the normal power supply.	The Balancing Authority failed to provide adequate and reliable backup power supplies to ensure continuous operation of AGC and vital data recording equipment during loss of the normal power supply.
BAL-005-0.1b	R16.	The Balancing Authority shall sample data at least at the same periodicity with which ACE is calculated. The Balancing Authority	The Balancing Authority failed to collect coincident data to the greatest practical extent.	N/A	The Balancing Authority failed to flag missing or bad data for operator display and archival purposes.	The Balancing Authority failed to sample data at least at the same periodicity with which ACE is calculated.

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		shall flag missing or bad data for operator display and archival purposes. The Balancing Authority shall collect coincident data to the greatest practical extent, i.e., ACE, Interconnection frequency, Net Actual Interchange, and other data shall all be sampled at the same time.				
BAL-005-0.1b	R17.	Each Balancing Authority shall at least annually check and calibrate its time error and frequency devices against a common reference. The Balancing Authority shall adhere to the minimum values for measuring devices as listed below: ***See Standard for Values***	N/A	N/A	N/A	The Balancing Authority failed to at least annually check and calibrate its time error and frequency devices against a common reference.
BAL-006-1.1	R1.	Each Balancing Authority shall calculate and record hourly Inadvertent Interchange.	The Balancing Authority failed to calculate and record hourly Inadvertent Interchange for 5% or less of the hours.	The Balancing Authority failed to calculate and record hourly Inadvertent Interchange for more than 5% up to (and	The Balancing Authority failed to calculate and record hourly Inadvertent Interchange for more than 10% up to (and	~~Each~~ The Balancing Authority failed to calculate and record hourly Inadvertent Interchange for greater than 15% of

Violation Severity Level Matrix (BAL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			~~N/A~~	including) 10% of the hours. ~~N/A~~	including) 15% of the hours. ~~N/A~~	the hours.
BAL-006-1.1	R3.	Each Balancing Authority shall ensure all of its Balancing Authority Area interconnection points are equipped with common megawatt-hour meters, with readings provided hourly to the control centers of Adjacent Balancing Authorities.	~~N/A~~The Balancing Authority failed to ensure that 5% or less of its Balancing Authority Area interconnection points are equipped with common megawatt-hour meters, with readings provided hourly to the control centers of Adjacent Balancing Authorities.	~~N/A~~The Balancing Authority failed to ensure that more than 5% up to (and including) 10% of its Balancing Authority Area interconnection points are equipped with common megawatt-hour meters, with readings provided hourly to the control centers of Adjacent Balancing Authorities.	~~N/A~~The Balancing Authority failed to ensure that more than 10% up to (and including) 15% of its Balancing Authority Area interconnection points are equipped with common megawatt-hour meters, with readings provided hourly to the control centers of Adjacent Balancing Authorities.	The Balancing Authority failed to ensure ~~all~~that more than 15% of its Balancing Authority Area interconnection points are equipped with common megawatt-hour meters, with readings provided hourly to the control centers of Adjacent Balancing Authorities.

Violation Severity Level Matrix (CIP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
CIP-001-1	R1.	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi site sabotage affecting larger portions of the Interconnection.	N/A	N/A	The responsible entity has procedures for the recognition of sabotage events on its facilities and multi site sabotage affecting larger portions of the Interconnection but does not have a procedure for making their operating personnel aware of said events.	The responsible entity failed to have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi site sabotage affecting larger portions of the Interconnection.
CIP-001-1	R2.	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall have procedures for the communication of information concerning sabotage events to appropriate parties in the Interconnection.	N/A	N/A	The responsible entity has demonstrated the existence of a procedure to communicate information concerning sabotage events, but not all of the appropriate parties in the interconnection are identified.	The responsible entity failed to have a procedure for communicating information concerning sabotage events.

Violation Severity Level Matrix (CIP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
CIP-001-1	R3.	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.	N/A	The responsible entity ~~has demonstrated the existence of a~~ provided its operating personnel with a sabotage response guideline, but failed to include the personnel to contact for reporting disturbances due to sabotage events~~, but the guideline did not list all of the appropriate personnel to contact~~.	~~The responsible entity has demonstrated the existence of a response guideline for reporting disturbances due to sabotage events, including all of the appropriate personnel to contact, but the guideline was not available to its operating personnel.~~N/A	The responsible entity failed to ~~have~~provide its operating personnel with a sabotage response guideline ~~for reporting disturbances due to sabotage events.~~.
CIP-001-1	R4.	Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Load-Serving Entity shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials and develop reporting procedures	N/A	N/A	The responsible entity has established communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials, but has not developed a reporting procedure.	The responsible entity failed to establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) or Royal Canadian Mounted Police (RCMP) officials, ~~nor~~and has not developed a reporting procedure.

Violation Severity Level Matrix (CIP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		as appropriate to their circumstances.				

Violation Severity Level Matrix (COM)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
COM-001-1.1	R1.	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide adequate and reliable telecommunications facilities for the exchange of Interconnection and operating information:	N/A~~The responsible entity's telecommunications is not redundant or diversely routed as applicable by other operating entities for the exchange of interconnection or operating data.~~	The responsible entity~~'s~~ failed to provide adequate and reliable ~~telecommunications is not redundant or diversely routed as applicable and has failed to establish~~ telecommunications facilities ~~internally~~ for the exchange of I~~i~~nterconnection and~~or~~ operating information to one of the groups specified in R1.1, or R1.2, or R1.3~~data needed to maintain BES reliability.~~	The responsible entity~~'s telecommunications is not redundant or diversely routed as applicable and has~~ failed to ~~establish~~ provide adequate and reliable telecommunications ~~internally and with **other** Reliability Coordinators, Transmission Operators, or Balancing Authorities~~ facilities for the exchange of I~~i~~nterconnection or operating ~~data needed to maintain BES reliability~~ information to two of the groups specified in R1.1, or R1.2, or R1.3.	The responsible entity failed to provide adequate and reliable telecommunications facilities for the exchange of Interconnection and operating information to all 3 of the groups specified in R1.1, or R1.2, or R1.3. OR The responsible entity's telecommunications is not redundant or diversely routed as applicable as specified in R1.4 ~~and has failed to establish telecommunications internally and with both **other** and **its** Reliability Coordinators, Transmission Operators, or Balancing~~

Violation Severity Level Matrix (COM)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						~~Authorities for the exchange of interconnection or operating data needed to maintain BES reliability.~~
COM-001-1.1	R1.1.	Internally.	N/A	N/A	N/A	~~The responsible entity has failed to establish telecommunications internally for the exchange of interconnection or operating data needed to maintain BES reliability.~~N/A
COM-001-1.1	R1.2.	Between the Reliability Coordinator and its Transmission Operators and Balancing Authorities.	N/A	N/A	N/A	~~The responsible entity has failed to establish telecommunications with its Reliability Coordinator, Transmission Operators, or Balancing Authorities for the exchange of interconnection or operating data needed to maintain BES reliability.~~N/A
COM-001-1.1	R1.3.	With other Reliability Coordinators,	N/A	N/A	N/A	~~The responsible entity has failed to establish~~

Violation Severity Level Matrix (COM)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Transmission Operators, and Balancing Authorities as necessary to maintain reliability.				~~telecommunications with other Reliability Coordinators, Transmission Operators, or Balancing Authorities for the exchange of interconnection or operating data needed to maintain BES reliability.~~N/A
COM-001-1.1	R1.4.	Where applicable, these facilities shall be redundant and diversely routed.	N/A	N/A	N/A	~~The responsible entity's telecommunications is not redundant or diversely routed where applicable for the exchange of interconnection or operating data.~~N/A
COM-001-1.1	R2.	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall manage, alarm, test and/or actively monitor vital telecommunications facilities. Special attention shall be given to emergency	N/A	The responsible entity has failed to manage, alarm, and test or actively monitor its emergency telecommunications facilities.	The responsible entity has failed to manage, alarm, and test or actively monitor its ~~primary~~vital telecommunications facilities.	The responsible entity has failed to manage, alarm, and test or actively monitor its ~~primary~~vital and emergency telecommunications facilities.

Violation Severity Level Matrix (COM)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		telecommunications facilities and equipment not used for routine communications.				
COM-001-1.1	R4.	Unless agreed to otherwise, each Reliability Coordinator, Transmission Operator, and Balancing Authority shall use English as the language for all communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected Bulk Electric System. Transmission Operators and Balancing Authorities may use an alternate language for internal operations.	N/A	N/A	N/A	~~If using~~The responsible entity used a language other than English~~, the responsible entity~~ and failed to ~~provide documentation of~~have an agreement to ~~use a language other than English for all communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected Bulk Electric System.~~do so.
COM-001-1.1	R5.	Each Reliability Coordinator, Transmission Operator, and	N/A	N/A	N/A	The responsible entity did not have written operating instructions and

Violation Severity Level Matrix (COM)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Balancing Authority shall have written operating instructions and procedures to enable continued operation of the system during the loss of telecommunications facilities.				procedures to enable continued operation of the system during the loss of telecommunications facilities.
COM-001-1.1	R6.	Each NERCNet User Organization shall adhere to the requirements in Attachment 1-COM-001, “NERCNet Security Policy.”	The NERCNet User Organization failed to adhere to ~~less than~~ 25% or less of ~~of~~ the requirements listed in Attachment 1-COM-001~~-0~~, ~~Attachment 1~~, "NERCNet Security Policy".	The NERCNet User Organization failed to adhere to more than 25% ~~or more but less than 5~~up to (and including) 10% of the requirements listed in Attachment 1 - COM-001~~-0, Attachment 1~~, "NERCNet Security Policy".	The NERCNet User Organization failed to adhere to more than 150% ~~or more but less than~~ up to (and including) 175% of the requirements listed in Attachment 1-COM-001~~-0, Attachment 1,~~ "NERCNet Security Policy".	The NERCNet User Organization failed to more than 1~~adhere to 7~~5% ~~or more~~ of the requirements listed in Attachment 1-COM-001~~-0, Attachment 1~~, "NERCNet Security Policy".
COM-002-2	R1.	Each Transmission Operator, Balancing Authority, and Generator Operator shall have communications (voice and data links) with appropriate Reliability Coordinators,	N/A	The responsible entity did not have data links with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators. OR	~~The responsible entity did not staff the communications (voice and data links) on a 24 hour basis.~~N/A	The responsible entity failed to have communications (voice and data links) with appropriate Reliability Coordinators, Balancing Authorities, and Transmission

Violation Severity Level Matrix (COM)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Balancing Authorities, and Transmission Operators. Such communications shall be staffed and available for addressing a real-time emergency condition.		The responsible entity did not have voice links with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators.		Operators. OR The responsible entity's communications were not staffed and available for addressing real time emergency conditions.
COM-002-2	R1.1.	Each Balancing Authority and Transmission Operator shall notify its Reliability Coordinator, and all other potentially affected Balancing Authorities and Transmission Operators through predetermined communication paths of any condition that could threaten the reliability of its area or when firm load shedding is anticipated.	N/A	N/A	The responsible entity failed to notify all other potentially affected Balancing Authorities and Transmission Operators through predetermined communication paths of any condition that could threaten the reliability of its area or when firm load shedding ~~is~~was anticipated.	The responsible entity failed to notify its Reliability Coordinator, and all other potentially affected Balancing Authorities and Transmission Operators through predetermined communication paths of any condition that could threaten the reliability of its area or when firm load shedding ~~is~~was anticipated.
COM-002-2	R2.	Each Reliability Coordinator, Transmission Operator, and	N/A	The responsible entity provided a clear directive in a clear, concise and	The responsible entity provided a clear directive in a clear, concise and	The responsible entity failed to provide a clear directive in a clear,

Violation Severity Level Matrix (COM)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Balancing Authority shall issue directives in a clear, concise, and definitive manner; shall ensure the recipient of the directive repeats the information back correctly; and shall acknowledge the response as correct or repeat the original statement to resolve any misunderstandings.		definitive manner and required the recipient to repeat the directive, but did not acknowledge the recipient was correct in the repeated directive.	definitive manner, but did not require the recipient to repeat the directive.	concise and ~~difinitive~~definitive manner when required.

Violation Severity Level Matrix (EOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
EOP-001-0	R1.	Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities.	~~The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for less than 25% of the adjacent BAs. Or less than 25% of those agreements do not contain provisions for emergency assistance.~~N/A	The Balancing Authority ~~failed to demonstrate~~demonstrated the existence of ~~the necessary~~an operating ~~agreements for 25% to 50% of the~~agreement with at least one adjacent ~~BAs. Or 25 to 50% of those agreements do not contain provisions~~Balancing Authority for emergency assistance, but the agreement did not include provision for obtaining emergency assistance from any remote Balancing Authority.	~~The Balancing Authority failed to demonstrate the existence of the necessary operating agreements for 50% to 75% of the adjacent BAs. Or 50% to 75% of those agreements do not contain provisions for emergency assistance.~~ N/A	The Balancing Authority ~~failed to~~ did not demonstrate the existence of ~~the necessary~~any operating agreements ~~for 75% or more of the~~with adjacent ~~BAs. Or more than 75% of those agreements do not contain provisions~~Balancing Authorities that include provision for emergency assistance with adjacent Balancing Authorities.
EOP-001-0	R2.	The Transmission Operator shall have an emergency load reduction plan for all identified IROLs. The plan shall include the details on how the Transmission Operator will implement load	~~The Transmission Operator has demonstrated the existence of the emergency load reduction plan but the plan will take longer than 30 minutes.~~N/A	N/A	The Transmission Operator ~~fails to include details on how~~demonstrated the existence of an emergency load reduction plan ~~is to be implemented in sufficient amount and time to mitigate~~ for each identified	The Transmission Operator failed to demonstrate the existence of an emergency load reduction plan~~s~~ for all identified IROLs.

Violation Severity Level Matrix (EOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		reduction in sufficient amount and time to mitigate the IROL violation before system separation or collapse would occur. The load reduction plan must be capable of being implemented within 30 minutes.			IROL ~~violation.~~but at least one of the plans will take longer than 30 minutes to implement.	
EOP-001-0	R3.	Each Transmission Operator and Balancing Authority shall:	~~The Transmission Operator or Balancing Authority failed to comply with one (1) of the sub-components.~~N/A	~~The Transmission Operator or Balancing Authority failed to comply with two (2) of the sub-components.~~N/A	~~The Transmission Operator or Balancing Authority has failed to comply with three (3) of the sub-components.~~N/A	~~The Transmission Operator or Balancing Authority has failed to comply with four (4) of the sub-components.~~N/A
EOP-001-0	R3.1.	Develop, maintain, and implement a set of plans to mitigate operating emergencies for insufficient generating capacity.	N/A~~The Transmission Operator or Balancing Authority's emergency plans to mitigate insufficient generating capacity are missing minor details or minor program/procedural elements.~~	The Transmission Operator or Balancing Authority~~'s has~~ demonstrated the existence of ~~emergency~~a set of plans to mitigate operating emergencies for insufficient generating capacity ~~emergency plans~~and the plans are implemented but the	The Transmission Operator or Balancing ~~Authority's emergency~~Authority demonstrated the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity ~~emergency~~but the plans are ~~not~~neither maintained nor	The Transmission Operator or Balancing Authority ~~has~~ failed to ~~develop emergency mitigation~~demonstrate the existence of a set of plans to mitigate operating emergencies for insufficient generating capacity.

Violation Severity Level Matrix (EOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				plans are not maintained.	implemented.	
EOP-001-0	R3.2.	Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.	~~The Transmission Operator or Balancing Authority's plans to mitigate transmission system emergencies are missing minor details or minor program/procedural elements.~~ N/A	The Transmission Operator or Balancing Authority~~'s has~~ demonstrated the existence of a set of plans to mitigate operating emergencies on the transmission system ~~emergency~~and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing ~~Authority's~~Authority demonstrated the existence of a set of plans to mitigate operating emergencies on the transmission system ~~emergency~~but the plans are ~~not~~neither maintained nor implemented.	The Transmission Operator or Balancing Authority ~~has~~ failed to ~~develop, maintain, and implement~~demonstrate the existence of a set of plans to mitigate operating ~~emergency mitigation plans for~~ emergencies on the transmission system.
EOP-001-0	R3.3.	Develop, maintain, and implement a set of plans for load shedding.	~~The Transmission Operator or Balancing Authority's load shedding plans are missing minor details or minor program/procedural elements.~~ N/A	The Transmission Operator or Balancing Authority~~'s has~~ demonstrated the existence of a set of plans for load shedding and the plans are implemented but the plans are not maintained.	The Transmission Operator or Balancing ~~Authority's~~Authority demonstrated the existence of a set of plans for load ~~shedding plans~~ shedding but the plans are ~~partially compliant with the requirement but are not~~neither maintained nor implemented.	The Transmission Operator or Balancing Authority ~~has~~ failed to ~~develop, maintain, and implement~~demonstrate the existence of a set of plans for load shedding ~~plans~~.
EOP-001-0	R3.4.	Develop, maintain, and implement a set	~~The Transmission Operator or~~	The Transmission Operator or	The Transmission Operator or	The Transmission Operator or

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		of plans for system restoration.	~~Balancing Authority's system restoration plans are missing minor details or minor program/procedural elements.~~ N/A	Balancing ~~Authority's~~Authority demonstrated the existence of a set of plans for system restoration ~~plans~~ and the plans are ~~partially compliant with the requirement~~implemented but the plans are not maintained.	Balancing ~~Authority's~~Authority demonstrated the existence of a set of plans for system ~~restoration~~restoration but the plans are ~~not~~neither maintained nor implemented.	Balancing Authority ~~has~~ failed to ~~develop, maintain, and implement operating emergency mitigation~~demonstrate the existence of a set of plans for system restoration.
EOP-001-0	R4.	Each Transmission Operator and Balancing Authority shall have emergency plans that will enable it to mitigate operating emergencies. At a minimum, Transmission Operator and Balancing Authority emergency plans shall include:	The Transmission Operator or Balancing Authority ~~failed~~demonstrated the existence of emergency plans that will enable it to ~~comply with one (1) of the~~ mitigate operating emergencies but the plans do not include sub-~~components.~~requirement R4.4.	The Transmission Operator or Balancing Authority ~~failed~~demonstrated the existence of emergency plans that will enable it to ~~comply with two (2) of the~~ mitigate operating emergencies but the plans do not include sub-~~components.~~requirement R4.3.	The Transmission Operator or Balancing Authority ~~has failed~~demonstrated the existence of emergency plans that will enable it to ~~comply with three (3) of the~~ mitigate operating emergencies but the plans do not include either sub-~~components.~~requirement R4.1 or R4.2.	The Transmission Operator or Balancing Authority ~~has failed~~demonstrated the existence of emergency plans that will enable it to ~~comply with all four (4)~~mitigate operating emergencies but the plans are missing two (2) or more of the sub-~~components.~~requirements identified for R4.
EOP-001-0	R4.1.	Communications protocols to be used during emergencies.	~~The Transmission Operator or Balancing Authority's communication~~	N/A	N/A	~~The Transmission Operator or Balancing Authority has failed to include communication~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			~~protocols included in the emergency plan are missing minor program/procedural elements.~~ N/A			~~protocols in its emergency plans to mitigate operating emergencies.~~ N/A
EOP-001-0	R4.2.	A list of controlling actions to resolve the emergency. Load reduction, in sufficient quantity to resolve the emergency within NERC-established timelines, shall be one of the controlling actions.	~~The Transmission Operator or Balancing Authority's list of controlling actions has resulted in meeting the intent of the requirement but is missing minor program/procedural elements.~~ N/A	N/A	~~The Transmission Operator or Balancing Authority provided a list of controlling actions; however the actions fail to resolve the emergency within NERC-established timelines.~~N/A	~~The Transmission Operator or Balancing Authority has failed to provide a list of controlling actions to resolve the emergency.~~ N/A
EOP-001-0	R4.3.	The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.	~~The Transmission Operator or Balancing Authority has demonstrated coordination with Transmission Operators and Balancing Authorities but is missing minor program/procedural elements.~~ N/A	N/A	N/A	~~The Transmission Operator or Balancing Authority has failed to demonstrate the tasks to be coordinated with adjacent Transmission Operator and Balancing Authorities as directed by the requirement.~~ N/A
EOP-001-0	R4.4.	Staffing levels for the emergency.	N/A	N/A	N/A	~~The Transmission Operator or Balancing Authority's~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						~~emergency plan does not include staffing levels for the emergency~~N/A
EOP-001-0	R6.	The Transmission Operator and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.	~~The Transmission Operator and Balancing Authority is missing minor program/procedural elements.~~ N/A	~~The Transmission Operator and Balancing Authority has failed to annually review one of it's emergency plans~~ N/A	~~The Transmission Operator and Balancing Authority has failed to annually review 2 of its emergency plans or communicate with 1 of its neighboring Balancing Authorities.~~N/A	The Transmission Operator ~~and~~ or Balancing Authority ~~has~~ failed to ~~annually~~provide evidence that it completed an annual review ~~and/or communicate any~~ , and updated each of its emergency plans ~~with~~appropriately. OR The Transmission Operator or Balancing Authority failed to provide a copy of one of its updated emergency plans to its Reliability Coordinator, all its neighboring Transmission Operators ~~or~~, and all its neighboring Balancing Authorities.
EOP-001-0	R7.	The Transmission Operator and	The Transmission Operator ~~and/~~or ~~the~~	The Transmission Operator ~~and/~~or ~~the~~	The Transmission Operator ~~and/~~or ~~the~~	The Transmission Operator ~~and/~~or ~~the~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Balancing Authority shall coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate. This coordination includes the following steps, as applicable:	Balancing Authority ~~failed to comply~~demonstrated that it coordinated its emergency plans with ~~one (1) of the sub-components.~~other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in R7.4 was applicable and was not included.	Balancing Authority ~~failed to comply~~demonstrated that it coordinated its emergency plans with ~~two (2) of the sub-components.~~other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in R7.3 was applicable and was not included.	Balancing Authority ~~has failed to comply~~demonstrated that it coordinated its emergency plans with ~~three (3) of the sub-components.~~other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in either R7.1 or R7.2 was applicable and was not included. .	Balancing Authority ~~has failed to comply~~demonstrated that it coordinated its emergency plans with ~~four (4~~other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in two (2) or more of the sub-~~components.~~requirements was applicable and was not included.
EOP-001-0	R7.1.	The Transmission Operator and Balancing Authority shall establish and maintain reliable communications between interconnected systems.	N/A	N/A	N/A	~~The Transmission Operator or Balancing Authority has failed to establish and maintain reliable communication between interconnected systems.~~N/A
EOP-001-0	R7.2.	The Transmission Operator and Balancing Authority shall arrange new interchange agreements to	N/A	N/A	N/A	~~The Transmission Operator or Balancing Authority has failed to arrange new interchange agreements to~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		provide for emergency capacity or energy transfers if existing agreements cannot be used.				~~provide for emergency capacity or energy transfers with required entities when existing agreements could not be used.~~N/A
EOP-001-0	R7.3.	The Transmission Operator and Balancing Authority shall coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply. (This includes water for hydro generators.)	N/A	N/A	N/A	~~The Transmission Operator or Balancing Authority has failed to coordinate transmission and generator maintenance schedules to maximize capacity or conserve fuel in short supply.~~N/A
EOP-001-0	R7.4.	The Transmission Operator and Balancing Authority shall arrange deliveries of electrical energy or fuel from remote systems through normal operating channels.	N/A	N/A	N/A	~~The Transmission Operator or Balancing Authority has failed to arrange for deliveries of electrical energy or fuel from remote systems through normal operating channels.~~N/A
EOP-002-2.1	R1.	Each Balancing Authority and Reliability	N/A	N/A	~~N/A~~The Balancing Authority or Reliability	The ~~Balancing Authority or Reliability~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Coordinator shall have the responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its respective area and shall exercise specific authority to alleviate capacity and energy emergencies.			Coordinator failed to provide evidence that it has responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its respective area.	~~Coordinator does not have responsibility and clear decision-making authority~~responsible entity failed to ~~take whatever actions are needed to ensure the reliability of its respective area OR The Balancing Authority or Reliability Coordinator did not~~ exercise its authority to alleviate a capacity ~~and~~ or energy ~~emergencies.~~emergency.
EOP-002-2.1	R2.	Each Balancing Authority shall implement its capacity and energy emergency plan, when required and as appropriate, to reduce risks to the interconnected system.	N/A	N/A	N/A	The Balancing Authority ~~did not~~ failed to implement its capacity and energy emergency plan, when required and as appropriate, to reduce risks to the interconnected system.
EOP-002-2.1	R3.	A Balancing Authority that is experiencing an operating capacity or	N/A	N/A	~~The Balancing Authority communicated its current and future~~	The Balancing Authority ~~has~~ experienced an operating capacity or

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		energy emergency shall communicate its current and future system conditions to its Reliability Coordinator and neighboring Balancing Authorities.			~~system conditions to its Reliability Coordinator but did not communicate to one or more of its neighboring Balancing Authorities.~~N/A	energy emergency and failed to communicate its current and future system conditions to its Reliability Coordinator and its neighboring Balancing Authorities.
EOP-002-2.1	R4.	A Balancing Authority anticipating an operating capacity or energy emergency shall perform all actions necessary including bringing on all available generation, postponing equipment maintenance, scheduling interchange purchases in advance, and being prepared to reduce firm load.	N/A	N/A	N/A	The Balancing Authority ~~has~~anticipating an operating capacity or energy emergency failed to perform ~~the~~ all actions necessary ~~actions as required and stated~~including bringing on all available generation, postponing equipment maintenance, scheduling interchange purchases in ~~the requirement.~~advance, or preparing to reduce firm load.
EOP-002-2.1	R5.	A deficient Balancing Authority shall only use the assistance provided	N/A	N/A	The Balancing Authority used the assistance provided by the	The Balancing Authority used the assistance provided by the

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		by the Interconnection's frequency bias for the time needed to implement corrective actions. The Balancing Authority shall not unilaterally adjust generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes. Such unilateral adjustment may overload transmission facilities.			Interconnection's frequency bias for more time than needed to implement corrective actions. OR The Balancing Authority unilaterally adjusted generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.	Interconnection's frequency bias for more time than needed to implement corrective actions ~~and~~ AND The Balancing Authority unilaterally ~~adjust~~adjusted generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes.
EOP-002-2.1	R6.	If the Balancing Authority cannot comply with the Control Performance and Disturbance Control Standards, then it shall immediately implement remedies to do so. These remedies include, but are not limited	~~The Balancing Authority failed to comply with one of the sub-components.~~N/A	~~The Balancing Authority failed to comply with 2 of the sub-components.~~N/A	The Balancing Authority ~~failed~~was not able to comply with ~~3~~the Control Performance and Disturbance Control Standards and failed to immediately implement one (1) of the sub-~~components.~~requirements R6.1, R6.2,	The Balancing Authority ~~failed~~was not able to comply with the Control Performance and Disturbance Control Standards and failed to immediately implement more than ~~3~~one (1) of the sub-~~components.~~require

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		to:			R6.3, R6.4, R6.5 or R6.6.	ments R6.1, R6.2, R6.3, R6.4, R6.5 or R6.6. OR The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and did not immediately implement any remedies.
EOP-002-2.1	R6.1.	Loading all available generating capacity.	N/A	N/A	N/A	~~The Balancing Authority did not use all available generating capacity.~~ N/A
EOP-002-2.1	R6.2.	Deploying all available operating reserve	N/A	N/A	N/A	~~The Balancing Authority did not deploy all of its available operating reserve.~~ N/A
EOP-002-2.1	R6.3.	Interrupting interruptible load and exports.	N/A	N/A	N/A	~~The Balancing Authority did not interrupt interruptible load and exports.~~ N/A
EOP-002-2.1	R6.4.	Requesting emergency assistance from other Balancing	N/A	N/A	N/A	~~The Balancing Authority did not request emergency assistance from other~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Authorities.				~~Balancing Authorities.~~N/A
EOP-002-2.1	R6.5.	Declaring an Energy Emergency through its Reliability Coordinator; and	N/A	N/A	N/A	~~The Balancing Authority did not declare an Energy Emergency through its Reliability Coordinator.~~N/A
EOP-002-2.1	R6.6.	Reducing load, through procedures such as public appeals, voltage reductions, curtailing interruptible loads and firm loads.	N/A	N/A	N/A	~~The Balancing Authority did not implement one or more of the procedures stated in the requirement.~~N/A
EOP-002-2.1	R7.	Once the Balancing Authority has exhausted the steps listed in Requirement 6, or if these steps cannot be completed in sufficient time to resolve the emergency condition, the Balancing Authority shall:	N/A	N/A	The Balancing Authority ~~has met only one of~~exhausted the ~~two requirements~~ steps listed in R6 or the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirement R7.1. OR The Balancing	The Balancing Authority ~~has~~exhausted the steps listed in R6 or the steps listed in R6 could not ~~met either of the two requirements~~be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirement R7.1. AND The Balancing

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					Authority exhausted the steps listed in R6 or the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirement R7.2.	Authority exhausted the steps listed in R6 or the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirement R7.2.
EOP-002-2.1	R7.1.	Manually shed firm load without delay to return its ACE to zero; and	N/A	N/A	N/A	~~The Balancing Authority did not manually shed firm load without delay to return it's ACE to zero.~~N/A
EOP-002-2.1	R7.2.	Request the Reliability Coordinator to declare an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0 "Energy Emergency Alert Levels."	~~The Balancing Authority's implementation of an Energy Emergency Alert has missed minor program/procedural elements in Attachment 1-EOP-002-0.~~ N/A	N/A	N/A	~~The Balancing Authority has failed to meet one or more of the requirements of Attachment 1-EOP-002-0.~~ N/A
EOP-002-2.1	R8.	A Reliability Coordinator that has any Balancing Authority within its Reliability Coordinator area	~~The Reliability Coordinator's implementation of an Energy Emergency Alert has missed minor~~	~~N/~~A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a	~~N/~~A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a	~~The~~ A Reliability Coordinator had~~has failed to meet one or more of the requirements of Attachment 1-EOP-~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		experiencing a potential or actual Energy Emergency shall initiate an Energy Emergency Alert as detailed in Attachment 1-EOP-002-0 "Energy Emergency Alert Levels." The Reliability Coordinator shall act to mitigate the emergency condition, including a request for emergency assistance if required.	~~program/procedural elements in Attachment 1-EOP-002-0.~~ N/A	potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert **Level 1** as detailed in Attachment 1-EOP-002-0 "Energy Emergency Alert Levels."	potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert **Level 2** or 3 as detailed in Attachment 1-EOP-002-0 "Energy Emergency Alert Levels."	~~002-0.~~ a Balancing Authority within its Reliability Coordinator area experiencing an actual Energy Emergency and the Reliability Coordinator did not act to mitigate the emergency condition by requesting emergency assistance when this was required.
EOP-002-2.1	R9.	When a Transmission Service Provider expects to elevate the transmission service priority of an Interchange Transaction from Priority 6 (Network Integration Transmission Service from Non-designated Resources) to Priority 7 (Network Integration	~~The Reliability Coordinator failed to comply with one (1) of the sub-components.~~ N/A	~~The Reliability Coordinator failed to comply with two (2) of the sub-components.~~ N/A	~~The Reliability Coordinator has failed to comply with three (3) of the sub-components.~~ N/A	~~The Reliability Coordinator has failed to comply with all four (4) of the sub-components.~~ N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Transmission Service from designated Network Resources) as permitted in its transmission tariff (See Attachment 1-IRO-006-0 "Transmission Loading Relief Procedure" for explanation of Transmission Service Priorities):				
EOP-002-2.1	R9.1.	The deficient Load-Serving Entity shall request its Reliability Coordinator to initiate an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0.	N/A	N/A	N/A	~~The~~For an expected elevation in transmission service priority from Priority 6 to Priority 7, the deficient Load-Serving Entity failed to request its Reliability Coordinator ~~to~~ initiate an Energy Emergency Alert in accordance with Attachment 1-EOP-002-0.
EOP-002-2.1	R9.2.	The Reliability Coordinator shall submit the report to NERC for posting on the NERC	N/A	N/A	N/A	The Reliability Coordinator ~~has~~ failed to submit the report to NERC ~~as directed in the~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Website, noting the expected total MW that may have its transmission service priority changed.				~~requirement.~~for posting on the NERC Website, noting the expected total MW that may have its transmission service priority changed.
EOP-002-2.1	R9.3.	The Reliability Coordinator shall use EEA 1 to forecast the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.	N/A	N/A	N/A	The Reliability Coordinator failed to use EEA 1 to forecast the change of the priority of transmission service ~~as directed in~~of an Interchange Transaction on the ~~requirement.~~system from Priority 6 to Priority 7.
EOP-002-2.1	R9.4.	The Reliability Coordinator shall use EEA 2 to announce the change of the priority of transmission service of an Interchange Transaction on the system from Priority 6 to Priority 7.	N/A	N/A	N/A	The Reliability Coordinator failed to use EEA 2 to announce the change of the priority of transmission service ~~as directed in~~of an Interchange Transaction on the ~~requirement.~~system from Priority 6 to Priority 7.
EOP-003-1	R1.	After taking all other remedial steps, a	N/A	N/A	N/A	The Transmission Operator or

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Transmission Operator or Balancing Authority operating with insufficient generation or transmission capacity shall shed customer load rather than risk an uncontrolled failure of components or cascading outages of the Interconnection.				Balancing Authority ~~has~~ failed to shed customer load.
EOP-003-1	R2.	Each Transmission Operator and Balancing Authority shall establish plans for automatic load shedding for underfrequency or undervoltage conditions.	N/A	N/A	N/A	The ~~applicable~~responsible entity did not establish plans for automatic load~~-~~shedding~~,~~ as directed by the requirement.
EOP-003-1	R3.	Each Transmission Operator and Balancing Authority shall coordinate load shedding plans among other interconnected Transmission Operators and Balancing Authorities.	The ~~applicable~~responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting 5% or less of its required entities.	The ~~applicable~~responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting ~~between~~more than 5~~-~~% up to (and including) 10% of its	The ~~applicable~~responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting more than 10~~-~~%, up to (and including) 15~~%,~~ ~~inclusive~~% or less,	The ~~applicable~~responsible entity did not coordinate load shedding plans, as directed by the requirement, affecting ~~greater~~more than 15% of its required entities.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				required entities.	of its required entities.	
EOP-003-1	R5.	A Transmission Operator or Balancing Authority shall implement load shedding in steps established to minimize the risk of further uncontrolled separation, loss of generation, or system shutdown.	N/A	N/A	N/A	The Transmission Operator or Balancing Authority ~~has~~ failed to implement load shedding ~~as directed~~ in steps established to minimize the ~~requirement.~~risk of further uncontrolled separation, loss of generation, or system shutdown.
EOP-003-1	R6.	After a Transmission Operator or Balancing Authority Area separates from the Interconnection, if there is insufficient generating capacity to restore system frequency following automatic underfrequency load shedding, the Transmission Operator or Balancing Authority shall shed additional load.	N/A	N/A	N/A	The Transmission Operator or Balancing Authority ~~did not~~failed to shed additional load after it had separated from the Interconnection when there was insufficient generating capacity to restore system frequency following automatic underfrequency load shedding.
EOP-003-1	R8.	Each Transmission	N/A	The	The	The

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Operator or Balancing Authority shall have plans for operator-controlled manual load shedding to respond to real-time emergencies. The Transmission Operator or Balancing Authority shall be capable of implementing the load shedding in a timeframe adequate for responding to the emergency.		~~applicable~~responsible entity did not have plans for operator controlled manual load shedding, as directed by the requirement.	~~applicable~~responsible entity has plans for manual load shedding but did not have the capability to implement the load shedding, as directed by the requirement.	~~applicable~~responsible entity did not have plans for operator controlled manual load shedding, as directed by the requirement nor had the capability to implement the load shedding, as directed by the requirement.
EOP-004-1	R2.	A Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity shall promptly analyze Bulk Electric System disturbances on its system or facilities.	~~N/A~~The responsible entity failed to promptly analyze 5% or less of its disturbances on the BES.	The responsible ~~entities has~~entity failed to promptly analyze ~~1%~~more than 5% up to ~~25~~(and including) 10% of its disturbances on the BES ~~or was negligent in the timeliness of analyzing the disturbances 1% to 25% of the time.~~.	The responsible ~~entities has~~entity failed to promptly analyze ~~26%~~more than 10% up to ~~50~~(and including) 15% of its disturbances on the BES ~~or was negligent in the timeliness of analyzing the disturbances 26% to 50% of the time.~~.	The responsible ~~entities has~~entity failed to promptly analyze more than ~~50~~15% of its disturbances on the BES ~~or negligent in the timeliness of analyzing the disturbances more than 50% of the time~~.
EOP-004-1	R3.1.	The affected Reliability Coordinator,	The responsible entity submitted the report as required in	The responsible entity~~ies~~ submitted the report as	The responsible entities submitted the report as	The responsible entities submitted the report as

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Balancing Authority, Transmission Operator, Generator Operator or Load-Serving Entity shall submit within 24 hours of the disturbance or unusual occurrence either a copy of the report submitted to DOE, or, if no DOE report is required, a copy of the NERC Interconnection Reliability Operating Limit and Preliminary Disturbance Report form. Events that are not identified until some time after they occur shall be reported within 24 hours of being recognized.	R3.1 more than 24 but less than or equal to 36 hours after the disturbance or unusual occurrence, or discovery of the disturbance or unusual occurrence.~~N/A~~	required in R3.1 more than~~within 25 to~~ 36 hours but less than or equal to 48 hours after ~~of~~the disturbance or unusual occurrence, or discovery of the disturbance or unusual occurrence.	required in R3.1 more than ~~within 36 to~~ 48 hours but less than or equal to 72 hours after ~~of~~ the disturbance or unusual occurrence, or discovery of the disturbance or unusual occurrence.	required in R3.1 more than ~~48~~ 72-hours after the disturbance or unusual occurrence or discovery of the disturbance or unusual occurrence.
EOP-004-1	R3.2.	Applicable reporting forms are provided in Attachments 1-EOP-004 and 2-EOP-004.	N/A	N/A	N/A	N/A
EOP-004-1	R3.3.	Under certain adverse conditions, e.g., severe weather,	N/A~~The responsible entity provided its Reliability~~	N/A	N/A	The responsible entity did not provide its Regional

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		it may not be possible to assess the damage caused by a disturbance and issue a written Interconnection Reliability Operating Limit and Preliminary Disturbance Report within 24 hours. In such cases, the affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load-Serving Entity shall promptly notify its Regional Reliability Organization(s) and NERC, and verbally provide as much information as is available at that time. The affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load-Serving Entity shall then provide timely,	~~Coordinator and NERC with periodic, verbal updates about a disturbance, but the updates did not include all information that was available at the time.~~			Reliability ~~Coordinator~~Organization(s) and NERC with verbal notification or updates about a disturbance as specified in R3.3.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		periodic verbal updates until adequate information is available to issue a written Preliminary Disturbance Report.				
EOP-004-1	R3.4.	If, in the judgment of the Regional Reliability Organization, after consultation with the Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load-Serving Entity in which a disturbance occurred, a final report is required, the affected Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, or Load-Serving Entity shall prepare this report within 60 days. As a minimum, the final report shall have a discussion of the	The responsible ~~entities~~entity submitted the final report ~~is~~no more than 30 days past the 60 day due date; or the final report was missing ~~minor details or minor program/procedural~~one of the three elements~~.~~ specified in R3.4.	The responsible ~~entities~~entity submitted the final report between 31 days and 60 days inclusive past the 60 day due date. OR The final report was ~~30 days late or was~~ missing ~~one~~two of the three elements specified in ~~the requirement.~~R3.4.	The responsible entity submitted the ~~ies~~ final report between 61 days and 90 days inclusive past the 60 day due date ~~was more than 30 days late or was missing two of the elements specified in the requirement.~~	The responsible ~~entities~~ entity failed to submit the final report ~~was not~~. OR The responsible entity submitted the final report 91 days or more past the 60 day due date OR The responsible entity submitted a final report that was missing ~~more than two~~all three of the elements specified in ~~the requirement.~~R3.4.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		events and its cause, the conclusions reached, and recommendations to prevent recurrence of this type of event. The report shall be subject to Regional Reliability Organization approval.				
EOP-005-1	R2.	Each Transmission Operator shall review and update its restoration plan at least annually and whenever it makes changes in the power system network, and shall correct deficiencies found during the simulated restoration exercises.	The Transmission Operator failed to review or update its restoration plan when it made changes in the power system network.	The Transmission Operator failed to review and update its restoration plan at least annually.	The Transmission Operator failed to review and update its restoration plan at least annually or whenever it made changes in the power system network, and failed to correct deficiencies found during the simulated restoration exercises.	The Transmission Operator failed to review and update its restoration plan at least annually and whenever it made changes in the power system network, and failed to correct deficiencies found during the simulated restoration exercises.
EOP-005-1	R3.	Each Transmission Operator shall develop restoration plans with a priority of restoring the integrity of the Interconnection.	N/A	N/A	N/A	The Transmission Operator's restoration plans failed to make restoration of the integrity of the Interconnection a ~~top~~ priority.
EOP-005-1	R4.	Each Transmission Operator shall coordinate its	The Transmission Operator failed to coordinate its	The Transmission Operator failed to coordinate its	The Transmission Operator failed to coordinate its	The Transmission Operator failed to coordinate its

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		restoration plans with the Generator Owners and Balancing Authorities within its area, its Reliability Coordinator, and neighboring Transmission Operators and Balancing Authorities.	restoration plans with ~~one~~5% or less of the entities ~~listed~~identified in the requirement.	restoration plans with ~~two~~more than 5% up to (and including) 10% of the entities ~~listed~~identified in the requirement.	restoration plans with ~~three~~more than 10% up to (and including) 15% of the entities ~~listed~~identified in the requirement.	restoration plans with ~~four or~~ more than 15% of the entities ~~listed~~identified in the requirement.
EOP-005-1	R6.	Each Transmission Operator and Balancing Authority shall train its operating personnel in the implementation of the restoration plan. Such training shall include simulated exercises, if practicable.	The ~~responsible entity only trained less than 100% but greater than~~Transmission Operator or ~~equal~~Balancing Authority failed to ~~67 %~~ train 5% or less of its operating personnel in the implementation of the restoration plan.	The ~~responsible entity only trained less than 67 % but greater than~~Transmission Operator or ~~equal~~Balancing Authority failed to ~~33~~train more than 5% up to (and including) 10 % of its operating personnel in the implementation of the restoration plan.	The ~~responsible entity only trained less~~Transmission Operator or Balancing Authority failed to train more than ~~33~~ 10 % up to (and including) 15% of its operating personnel in the implementation of the restoration plan.	The ~~responsible entity did not trained any~~Transmission Operator or Balancing Authority failed to train more than 15% of its operating personnel in the implementation of the restoration plan.
EOP-005-1	R7.	Each Transmission Operator and Balancing Authority shall verify the restoration procedure by actual testing or by	~~The responsible entity verified 76% to 99% of the restoration procedure by actual testing or by simulation.~~ N/A	~~The responsible entity verified 51% to 75% of the restoration procedure by actual testing or by simulation.~~ N/A	~~The responsible entity verified 26% to 50% of the restoration procedure by actual testing or by simulation.~~ N/A	The ~~responsible entity verified less than 26% of~~Transmission Operator or Balancing Authority did not verify the

Violation Severity Level Matrix (EOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		simulation.				restoration procedure by actual testing or by simulation.
EOP-005-1	R8.	Each Transmission Operator shall verify that the number, size, availability, and location of system blackstart generating units are sufficient to meet Regional Reliability Organization restoration plan requirements for the Transmission Operator's area.	N/A	N/A	N/A	The Transmission Operator failed to verify that the number, size, availability, and location of system blackstart generating units are sufficient to meet Regional Reliability Organization restoration plan requirements for the Transmission Operator's area.
EOP-005-1	R9.	The Transmission Operator shall document the Cranking Paths, including initial switching requirements, between each blackstart generating unit and the unit(s) to be started and shall provide this documentation for review by the Regional Reliability	N/A	N/A	~~N/A~~The Transmission Operator documented the Cranking Paths, including initial switching requirements, between each blackstart generating unit and the unit(s) to be started, but did not provide the documentation as requested by the	The Transmission Operator ~~shall~~ failed to document the Cranking Paths, including initial switching requirements, between each blackstart generating unit and the unit(s) to be started ~~and shall provide this documentation for review by the Regional Reliability~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Organization upon request. Such documentation may include Cranking Path diagrams.			Regional Reliability Organization.	~~Organization upon request~~.
EOP-005-1	R10.	The Transmission Operator shall demonstrate, through simulation or testing, that the blackstart generating units in its restoration plan can perform their intended functions as required in the regional restoration plan.	~~The Transmission Operator only demonstrated, through simulation or testing, that between 67 and 99~~For less than 25% of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate, through simulation or testing, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.	~~The Transmission Operator only demonstrated, through simulation or testing, that between 33 and 66~~For 25% or more, but less than 50% of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate, through simulation or testing, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.	~~The Transmission Operator only demonstrated, through simulation or testing, that~~ For 50% or more, but less than ~~33~~75% of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate, through simulation or testing, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.	~~The Transmission Operator did not demonstrate, through simulation or testing, that any~~For 75% or more of the blackstart generating units in its restoration plan, the Transmission Operator failed to demonstrate, through simulation or testing, that these blackstart generating units can perform their intended functions as required in the regional restoration plan.
EOP-005-1	R10.1.	The Transmission Operator shall perform this simulation or testing at least once every five years.	N/A	N/A	N/A	The Transmission Operator failed to perform the required simulation or testing at least once every five years.
EOP-005-1	R11.5.	The affected	~~The responsible~~	~~The responsible~~	~~The responsible~~	~~The responsible~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Transmission Operators may resynchronize the isolated area(s) with the surrounding area(s) when the following conditions are met:	~~entity failed to include one of the subrequirements.~~N/A	~~entity failed to include two of the subrequirements.~~N/A	~~entity failed to include three of the subrequirements.~~N/A	~~entity failed to include four of the subrequirements.~~The Transmission Operator attempted to resynchronize an isolated area(s) with a surrounding area(s) when one (1) or more of the sub-requirements of R11.5 were not met.
EOP-005-1	R11.5.1.	Voltage, frequency, and phase angle permit.	N/A	N/A	N/A	~~The responsible entity failed to meet this requirement before resynchronizing isolated areas.~~N/A
EOP-005-1	R11.5.2.	The size of the area being reconnected and the capacity of the transmission lines effecting the reconnection and the number of synchronizing points across the system are considered.	N/A	N/A	N/A	~~The responsible entity failed to meet this requirement before resynchronizing isolated areas.~~N/A
EOP-005-1	R11.5.3.	Reliability Coordinator(s) and adjacent areas are notified and Reliability Coordinator	N/A	N/A	N/A	~~The responsible entity failed to meet this requirement before resynchronizing isolated areas.~~N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		approval is given.				
EOP-005-1	R11.5.4.	Load is shed in neighboring areas, if required, to permit successful interconnected system restoration.	N/A	N/A	N/A	~~The responsible entity failed to meet this requirement before resynchronizing isolated areas.~~N/A
EOP-006-1	R1.	Each Reliability Coordinator shall be aware of the restoration plan of each Transmission Operator in its Reliability Coordinator Area in accordance with NERC and regional requirements.	The Reliability Coordinator is not aware of ~~more than 75%~~5% or less of its Transmission ~~Operators~~Operators' restoration plans.	The Reliability Coordinator is not aware of more than 5~~0% but less than 75%~~% up to (and including) 10% of its Transmission ~~Operators~~Operators' restoration plans.	The Reliability Coordinator is not aware of more than ~~25% but less than 50~~10% up to (and including) 15% of its Transmission ~~Operators~~Operators' restoration plans.	The Reliability Coordinator is not aware of ~~any~~more than 15% of its Transmission ~~Operators~~Operators' restoration plans.
EOP-006-1	R2.	The Reliability Coordinator shall monitor restoration progress and coordinate any needed assistance.	N/A	N/A	The Reliability Coordinator failed to monitor restoration progress or failed to coordinate assistance.	The Reliability Coordinator failed to monitor restoration progress and failed to coordinate assistance.
EOP-006-1	R3.	The Reliability Coordinator shall have a Reliability Coordinator Area restoration plan that provides coordination between individual Transmission	N/A	The Reliability Coordinator's Reliability Coordinator Area restoration plan did not ~~coordinate with one~~provide coordination between less than	The Reliability Coordinator's Reliability Coordinator Area restoration plan did not ~~coordinate with~~provide coordination between 10% or	The Reliability Coordinator does not have a Reliability Coordinator Area restoration plan. OR The Reliability Coordinator's Reliability

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Operator restoration plans and that ensures reliability is maintained during system restoration events.		10% of its individual Transmission Operator restoration plans.	more ~~than one individual~~of the Transmission Operator restoration plans.	Coordinator Area restoration plan does not ensure reliability is maintained during system restoration events.
EOP-006-1	R4.	The Reliability Coordinator shall serve as the primary contact for disseminating information regarding restoration to neighboring Reliability Coordinators and Transmission Operators or Balancing Authorities not immediately involved in restoration.	~~The Reliability Coordinator failed to disseminate information regarding restoration to one neighboring Reliability Coordinator or Transmission Operator or Balancing Authority not immediately involved in restoration.~~N/A	~~The Reliability Coordinator failed to disseminate information regarding restoration to two neighboring Reliability Coordinators or Transmission Operators or Balancing Authorities not immediately involved in restoration.~~N/A	~~The Reliability Coordinator failed to disseminate information regarding restoration to three neighboring Reliability Coordinators or Transmission Operators or Balancing Authorities not immediately involved in restoration.~~N/A	The Reliability Coordinator failed to ~~disseminate~~serve as primary contact for disseminating information regarding restoration ~~to four or more neighboring Reliability Coordinators or Transmission Operators or Balancing Authorities not immediately involved~~ in ~~restoration.~~accordance with Requirement R4.
EOP-006-1	R5.	Reliability Coordinators shall approve, communicate, and coordinate the re-synchronizing of major system islands	N/A	N/A	N/A	The Reliability ~~Coordinators~~ Coordinator failed to approve, communicate, and coordinate the re-synchronizing of

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		or synchronizing points so as not to cause a Burden on adjacent Transmission Operator, Balancing Authority, or Reliability Coordinator Areas.				major system islands or synchronizing points ~~and caused a Burden on adjacent Transmission Operator, Balancing Authority, or Reliability Coordinator Areas.~~as stated in Requirement R5.
EOP-006-1	R6.	The Reliability Coordinator shall take actions to restore normal operations once an operating emergency has been mitigated in accordance with its restoration plan.	N/A	N/A	N/A	The Reliability Coordinator failed to take actions to restore normal operations once an operating emergency ~~has been~~was mitigated in accordance with its restoration plan.
EOP-009-0	R2.	The Generator Owner or Generator Operator shall provide documentation of the test results of the startup and operation of each blackstart generating unit to the Regional Reliability Organizations and upon request to	~~The Generator Operator has provided the Blackstart testing documentation to its Regional Reliability Organization. However the documentation provided had missing minor program/procedural elements or failed to~~	N/A	N/A	The Generator Owner or Generator Operator did not provide the required ~~Blackstart~~blackstart documentation to its Regional Reliability Organization or upon request to NERC.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		NERC.	~~provide the documentation requested to NERC in 30 days.~~ N/A			

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
FAC-001-0	R1.	The Transmission Owner shall document, maintain, and publish facility connection requirements to ensure compliance with NERC Reliability Standards and applicable Regional Reliability Organization, subregional, Power Pool, and individual Transmission Owner planning criteria and facility connection requirements. The Transmission Owner's facility connection requirements shall address connection requirements for:	Not Applicable.	The Transmission Owner~~'s~~ failed to do one of the following: Document or maintain or publish facility connection requirements as specified in the Requirement OR -F~~f~~ailed to ~~address connection~~include one (1) of the components~~requirements for one of the subrequirements~~ and specified in R1.1, R1.2 or R1.3.	The Transmission Owner failed to do one of the following: Document or maintain or publish its facility~~'s facility~~ connection requirements as specified in the Requirement. OR Failed to include (2) of the components as specified in R1.1, R1.2 or R1.3 OR Failed to document or maintain or publish its facility ~~failed to address~~ connection requirements as specified in the Requirement **and** failed to include one (1) of the components as specified in R1.1,	The Transmission Owner~~'s~~ did not develop facility connection requirements ~~failed to address connection requirements for three of the subrequirements.~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					R1.2 or R1.3 ~~for two of the subrequirements.~~	
FAC-001-0	R1.1.	Generation facilities,	~~The Transmission Owner has Generation facility connection requirements, but they have not been updated to include changes that are currently in effect, but have not been in effect for more than one month.~~N/A	~~The Transmission Owner has Generation facility connection requirements, but they have not been updated to include changes that were effective more than one month ago, but not more than six months ago.~~N/A	~~The Transmission Owner has Generation facility connection requirements, but they have not been updated to include changes that were effective more than six months ago.~~N/A	~~The Transmission Owner does not have Generation facility connection requirements.~~N/A
FAC-001-0	R1.2.	Transmission facilities, and	~~The Transmission Owner has Transmission facility connection requirements, but they have not been updated to include changes that are currently in effect, but have not been in effect for more than one month.~~N/A	~~The Transmission Owner has Transmission facility connection requirements, but they have not been updated to include changes that were effective more than one month ago, but not more than six months ago.~~N/A	~~The Transmission Owner has Transmission facility connection requirements, but they have not been updated to include changes that were effective more than six months ago.~~N/A	~~The Transmission Owner does not have Transmission facility connection requirements.~~N/A
FAC-001-0	R1.3.	End-user facilities	~~The Transmission Owner has End-user facility connection requirements, but they have not been updated to include changes that are~~	~~The Transmission Owner has End-user facility connection requirements, but they have not been updated to include changes that were~~	~~The Transmission Owner has End-user facility connection requirements, but they have not been updated to include changes that were~~	~~The Transmission Owner does not have End-user facility connection requirements.~~N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			~~currently in effect, but have not been in effect for more than one month.~~N/A	~~effective more than one month ago, but not more than six months ago.~~N/A	~~effective more than six months ago.~~N/A	
FAC-001-0	R3.	The Transmission Owner shall maintain and update its facility connection requirements as required. The Transmission Owner shall make documentation of these requirements available to the users of the transmission system, the Regional Reliability Organization, and NERC on request (five business days).	The ~~Transmission Owner~~responsible entity made the requirements available more than five business days ~~after a request,~~ but ~~not more~~less than ~~ten~~or equal to 10 business days after a request.	The ~~Transmission Owner~~responsible entity made the requirements available more than ~~ten~~10 business days ~~after a request,~~ but ~~not more~~less than ~~twenty~~or equal to 20 business days after a request.	The ~~Transmission Owner~~responsible entity made the requirements available more than ~~twenty~~20 business days ~~after a request, but not more~~less than ~~thirty~~or equal to 30 business days after a request.	The ~~Transmission Owner~~responsible entity made the requirements available more than ~~thirty~~30 business days after a request.
FAC-002-0	R1.	The Generator Owner, Transmission Owner, Distribution Provider, and Load-Serving Entity seeking to integrate generation facilities, transmission facilities, and electricity end-user facilities shall each	The ~~Responsible Entity~~responsible entity failed to include in ~~their~~its assessment one of the ~~subrequirements.~~sub components (R1.1 to R1.5).	The ~~Responsible Entity~~responsible entity failed to include in ~~their~~its assessment two of the ~~subrequirements.~~sub components (R1.1 to R1.5).	The ~~Responsible Entity~~responsible entity failed to include in ~~their~~its assessment three of the ~~subrequirements.~~sub components (R1.1 to R1.5).	The ~~Responsible Entity~~responsible entity failed to include in ~~their~~its assessment four or more of the ~~subrequirements.~~sub components (R1.1 to R1.5).

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		coordinate and cooperate on its assessments with its Transmission Planner and Planning Authority. The assessment shall include:				
FAC-002-0	R1.1.	Evaluation of the reliability impact of the new facilities and their connections on the interconnected transmission systems.	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	~~The responsible entity's assessment did not include the evaluation.~~N/A
FAC-002-0	R1.2.	Ensurance of compliance with NERC Reliability Standards and applicable Regional, subregional, Power Pool, and individual system planning criteria and facility connection requirements.	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	~~The responsible entity's assessment did not include the ensurance of compliance.~~N/A
FAC-002-0	R1.3.	Evidence that the parties involved in the assessment have coordinated and cooperated on the assessment of the reliability impacts of	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	~~The responsible entity's assessment did not include the evidence of coordination.~~N/A

Violation Severity Level Matrix (FAC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		new facilities on the interconnected transmission systems. While these studies may be performed independently, the results shall be jointly evaluated and coordinated by the entities involved.				
FAC-002-0	R1.4.	Evidence that the assessment included steady-state, short-circuit, and dynamics studies as necessary to evaluate system performance in accordance with Reliability Standard TPL-001-0.	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	~~The responsible entity's assessment did not include the evidence of the studies.~~N/A
FAC-002-0	R1.5.	Documentation that the assessment included study assumptions, system performance, and alternatives considered, and jointly coordinated recommendations.	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	~~The responsible entity's assessment did not include the documentation.~~N/A
FAC-002-0	R2.	The Planning Authority, Transmission Planner, Generator	The responsible entity provided the documentation more than 30 calendar	The responsible entity provided the documentation more than ~~45~~40 calendar	The responsible entity provided the documentation more than 50 calendar	The responsible entity provided the documentation more than ~~120~~60 calendar

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Owner, Transmission Owner, Load-Serving Entity, and Distribution Provider shall each retain its documentation (of its evaluation of the reliability impact of the new facilities and their connections on the interconnected transmission systems) for three years and shall provide the documentation to the Regional Reliability Organization(s) and NERC on request (within 30 calendar days).	days~~,~~ but ~~not more~~less than ~~45~~or equal to 40 calendar days~~,~~ after a request.	days~~,~~ but ~~not more~~less than ~~60~~or equal to 50 calendar days~~,~~ after a request.	days but less than or equal to 60 calendar days~~, but not more than 120 calendar days,~~ after a request.	days after a request or was unable to provide the documentation for the required three-year period.
FAC-003-1	R1.	The Transmission owner shall prepare, and keep current, a formal transmission vegetation management program (TVMP). The TVMP shall include the Transmission Owner's objectives,	The ~~applicable~~ responsible entity did not include and keep current one of the four required elements of its TVMP, as directed by the requirement.	The ~~applicable~~ responsible entity did not include and keep current two of the four required elements of its TVMP, as directed by the requirement.	The ~~applicable~~ responsible entity did not include and keep current three of the four required elements of its TVMP, as directed by the requirement.	The ~~applicable~~ responsible entity did not include and keep current ~~four of the four~~ all required elements of the TVMP, as directed by the requirement.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		practices, approved procedures, and work Specifications. 1. ANSI A300, Tree Care Operations – Tree, Shrub, and Other Woody Plant Maintenance – Standard Practices, while not a requirement of this standard, is considered to be an industry best practice.				
FAC-003-1	R1.2.	The Transmission Owner, in the TVMP, shall identify and document clearances between vegetation and any overhead, ungrounded supply conductors, taking into consideration transmission line voltage, the effects of ambient temperature on conductor sag under maximum design loading, and the effects of wind velocities on conductor sway.	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	~~The Transmission Owner's TVMP does not specify clearances.~~The responsible entity, in its TVMP, failed to identify and document clearances between vegetation and any overhead, ungrounded supply conductors. OR The responsible entity, in its TVMP, failed to take into consideration transmission line voltage, or the

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		Specifically, the Transmission Owner shall establish clearances to be achieved at the time of vegetation management work identified herein as Clearance 1, and shall also establish and maintain a set of clearances identified herein as Clearance 2 to prevent flashover between vegetation and overhead ungrounded supply conductors.				effects of ambient temperature on conductor sag under maximum design loading, or the effects of wind velocities on conductor sway. OR The responsible entity, in its TVMP, failed to establish Clearance 1 or Clearance 2 values.
FAC-003-1	R1.2.1.	Clearance 1 — The Transmission Owner shall determine and document appropriate clearance distances to be achieved at the time of transmission vegetation management work based upon local conditions and the expected time frame in which the Transmission Owner plans to return for	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	~~The Transmission Owner's TVMP does not specify Clearance 1 values.~~The responsible entity failed to determine and document an appropriate clearance distance to be achieved at the time of transmission vegetation management work taking into account local conditions and

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		future vegetation management work. Local conditions may include, but are not limited to: operating voltage, appropriate vegetation management techniques, fire risk, reasonably anticipated tree and conductor movement, species types and growth rates, species failure characteristics, local climate and rainfall patterns, line terrain and elevation, location of the vegetation within the span, and worker approach distance requirements. Clearance 1 distances shall be greater than those defined by Clearance 2 below.				the expected time frame in which the responsible entity expects to return for future vegetation management work. OR The responsible entity documented a Clearance 1 value that was smaller than its Clearance 2 value.
FAC-003-1	R1.2.2.	Clearance 2 — The Transmission Owner shall determine and document specific radial clearances to	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	~~The Transmission Owner's TVMP does not specify Clearance 2 values.~~The

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		be maintained between vegetation and conductors under all rated electrical operating conditions. These minimum clearance distances are necessary to prevent flashover between vegetation and conductors and will vary due to such factors as altitude and operating voltage. These Transmission Owner-specific minimum clearance distances shall be no less than those set forth in the Institute of Electrical and Electronics Engineers (IEEE) Standard 516-2003 (*Guide for Maintenance Methods on Energized Power Lines*) and as specified in its Section 4.2.2.3, Minimum Air Insulation Distances				responsible entity failed to determine and document Clearance 2 values taking into account local conditions and the expected time frame in which the responsible entity expects to return for future vegetation management work.

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		without Tools in the Air Gap.				
FAC-003-1	R1.2.2.1.	Where transmission system transient overvoltage factors are not known, clearances shall be derived from Table 5, IEEE 516-2003, phase-to-ground distances, with appropriate altitude correction factors applied.	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	Where transmission system transient overvoltage factors ~~are~~ were known, clearances were not derived from Table 5, IEEE 516-2003, phase-to-phase voltages, with appropriate altitude correction factors applied.
FAC-003-1	R1.3.	All personnel directly involved in the design and implementation of the TVMP shall hold appropriate qualifications and training, as defined by the Transmission Owner, to perform their duties.	~~One or more persons~~ For responsible entities directly ~~involved~~ involving fewer than 20 persons in the design and implementation of the TVMP ~~(but not more than 35%~~, one of ~~the all personnel involved),~~those persons did not hold appropriate qualifications and training to perform their duties. For responsible entities directly involving 20 or more	~~More than 35% of all personnel~~For responsible entities directly ~~involved~~involving fewer than 20 persons in the design and implementation of the TVMP ~~(but not more than 70% of all personnel involved),~~, two of those persons did not hold appropriate qualifications and training to perform their duties. For responsible entities directly involving 20 or more	~~More than 70% of all personnel~~For responsible entities directly ~~involved~~involving fewer than 20 persons in the design and implementation of the TVMP ~~(but not 100% of all personnel involved),~~, three of those persons did not hold appropriate qualifications and training to perform their duties. For responsible entities directly involving 20 or more	~~None of the~~For responsible entities directly involving fewer than 20 persons ~~directly involved~~ in the design and implementation of the ~~Transmission Owner's~~ TVMP ~~held~~, more than three of those persons did not hold appropriate qualifications and training to perform their duties. For responsible entities directly involving 20 or more persons in the design

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			persons in the design and implementation of the TVMP, 5% or less of those persons did not hold appropriate qualifications and training to perform their duties.	persons in the design and implementation of the TVMP, more than 5% up to (and including) 10%of those persons did not hold appropriate qualifications and training to perform their duties.	persons in the design and implementation of the TVMP, more than 10% up to (and including) 15%of those persons did not hold appropriate qualifications and training to perform their duties.	and implementation of the TVMP, more than 15% of those persons did not hold appropriate qualifications and training to perform their duties.
FAC-003-1	R1.4.	Each Transmission Owner shall develop mitigation measures to achieve sufficient clearances for the protection of the transmission facilities when it identifies locations on the ROW where the Transmission Owner is restricted from attaining the clearances specified in Requirement 1.2.1.	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	N~~ot Applicable.~~/A	The ~~Transmission Owner's~~responsible entity's TVMP does not include mitigation measures to achieve sufficient clearances where restrictions to the ROW are in effect.
FAC-003-1	R1.5.	Each Transmission Owner shall establish and document a process for the immediate communication of vegetation conditions that	N/A	N/A	N/A	The ~~applicable~~responsible entity did not establish or did not document a process for the immediate communication of vegetation

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		present an imminent threat of a transmission line outage. This is so that action (temporary reduction in line rating, switching line out of service, etc.) may be taken until the threat is relieved.				conditions that present an imminent threat of line outage, as directed by the requirement.
FAC-003-1	R2.	The Transmission Owner shall create and implement an annual plan for vegetation management work to ensure the reliability of the system. The plan shall describe the methods used, such as manual clearing, mechanical clearing, herbicide treatment, or other actions. The plan should be flexible enough to adjust to changing conditions, taking into consideration anticipated growth of vegetation and all other environmental factors that may	The ~~Transmission Owner~~responsible entity did not meet one of the three required elements (including in the annual plan a description of methods used for vegetation management, maintaining documentation of adjustments to the annual plan, or having systems and procedures for tracking work performed as part of the annual plan) specified in the requirement.	The ~~Transmission Owner~~responsible entity did not meet two of the three required elements (including in the annual plan a description of methods used for vegetation management, maintaining documentation of adjustments to the annual plan, or having systems and procedures for tracking work performed as part of the annual plan) specified in the requirement.	The ~~Transmission Owner~~responsible entity did not meet the three required elements (including in the annual plan a description of methods used for vegetation management, maintaining documentation of adjustments to the annual plan, or having systems and procedures for tracking work performed as part of the annual plan) specified in the requirement.	The ~~Transmission Owner~~responsible entity does not have an annual plan for vegetation management~~, or the Transmission Owner~~. OR The responsible entity has not implemented the annual plan for vegetation management.

Violation Severity Level Matrix (FAC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		have an impact on the reliability of the transmission systems. Adjustments to the plan shall be documented as they occur. The plan should take into consideration the time required to obtain permissions or permits from landowners or regulatory authorities. Each Transmission Owner shall have systems and procedures for documenting and tracking the planned vegetation management work and ensuring that the vegetation management work was completed according to work specifications.				
FAC-003-1	R3.	The Transmission Owner shall report quarterly to its RRO, or the RRO's designee, sustained transmission line	~~The Transmission Owner did not submit a quarterly report to its RRO and did not have any outages to report~~The	~~The Transmission Owner did not report an outage specified as reportable in R3 to its RRO~~ The	~~The Transmission Owner did not report multiple outages specified as reportable in R3 to its RRO~~ The	~~The Transmission Owner did not report one or more outages specified as reportable in R3 to its RRO for two~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		outages determined by the Transmission Owner to have been caused by vegetation.	responsible entity failed to provide a quarterly outage report, but did not experience any reportable outages. OR The responsible entity provided a quarterly report, but failed to report in the manner specified by one or more of the following subcomponents of R3: R3.1 or R3.2.	responsible entity provided a quarterly report, but failed to include information required by R3.3.	responsible entity provided a quarterly outage report, but failed to include a reportable Category 3 outage as described in R3.4.3.	~~consecutive quarters~~The responsible entity experienced reportable outages but failed to provide a quarterly report. OR The responsible entity provided a quarterly outage report, but failed to include a reportable Category 1 (as described in R3.4.1) or Category 2 outage (as described in R3.4.2).
FAC-003-1	R3.1.	Multiple sustained outages on an individual line, if caused by the same vegetation, shall be reported as one outage regardless of the actual number of outages within a 24-hour period.	N~~ot applicable.~~/A	N~~ot applicable.~~/A	N~~ot applicable.~~/A	~~The Transmission Owner failed to report, as a single outage, multiple sustained outages within a 24-hour period on an individual line, if caused by the same vegetation.~~N/A
FAC-003-1	R3.2.	The Transmission Owner is not required to report to the RRO, or the RRO's designee, certain sustained	N~~ot applicable.~~/A	N~~ot applicable.~~/A	N~~ot applicable.~~/A	~~The Transmission Owner made reports for outages not considered reportable based on the categories listed~~

Violation Severity Level Matrix (FAC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		transmission line outages caused by vegetation: (1) Vegetation-related outages that result from vegetation falling into lines from outside the ROW that result from natural disasters shall not be considered reportable (examples of disasters that could create non-reportable outages include, but are not limited to, earthquakes, fires, tornados, hurricanes, landslides, wind shear, major storms as defined either by the Transmission Owner or an applicable regulatory body, ice storms, and floods), and (2) Vegetation-related outages due to human or animal activity shall not be considered reportable (examples of human				~~in this requirement.~~N/A

Violation Severity Level Matrix (FAC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		or animal activity that could cause a non-reportable outage include, but are not limited to, logging, animal severing tree, vehicle contact with tree, arboricultural activities or horticultural or agricultural activities, or removal or digging of vegetation).				
FAC-003-1	R3.3.	The outage information provided by the Transmission Owner to the RRO, or the RRO's designee, shall include at a minimum: the name of the circuit(s) outaged, the date, time and duration of the outage; a description of the cause of the outage; other pertinent comments; and any countermeasures taken by the Transmission Owner.	~~The outage information provided by the Transmission Owner to the RRO, or the RRO's designee, did not include one of the required elements.~~N/A	~~The outage information provided by the Transmission Owner to the RRO, or the RRO's designee, did not include two of the required elements.~~N/A	~~The outage information provided by the Transmission Owner to the RRO, or the RRO's designee, did not include three of the required elements.~~N/A	~~The outage information provided by the Transmission Owner to the RRO, or the RRO's designee, did not include four or more of the required elements.~~N/A

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FAC-003-1	R3.4.	An outage shall be categorized as one of the following:	N~~ot applicable.~~/A	N~~ot applicable.~~/A	N~~ot applicable.~~/A	~~The outage was not classified in the correct category.~~N/A
FAC-003-1	R3.4.1.	Category 1 — Grow-ins: Outages caused by vegetation growing into lines from vegetation inside and/or outside of the ROW;	N~~ot applicable.~~/A	N~~ot applicable.~~/A	N~~ot applicable.~~/A	~~The outage was not classified in the correct category.~~N/A
FAC-003-1	R3.4.2.	Category 2 — Fall-ins: Outages caused by vegetation falling into lines from inside the ROW;	N~~ot applicable.~~/A	N~~ot applicable.~~/A	N~~ot applicable.~~/A	~~The outage was not classified in the correct category.~~N/A
FAC-003-1	R3.4.3.	Category 3 — Fall-ins: Outages caused by vegetation falling into lines from outside the ROW.	N~~ot applicable.~~/A	N~~ot applicable.~~/A	N~~ot applicable.~~/A	~~The outage was not classified in the correct category.~~N/A
FAC-008-1	R1.	The Transmission Owner and Generator Owner shall each document its current methodology used for developing Facility Ratings (Facility Ratings Methodology) of its solely and jointly owned Facilities. The methodology	The responsible entity failed to include in their methodology one of the subcomponents of R1.3, (R1.3.1 to R1.3.5). ~~Not applicable.~~	The responsible entity failed to include in their methodology two of the subcomponents of R1.3, (R1.3.1 to R1.3.5).~~Not applicable.~~	The responsible entity rating methodology did not address either of the sub-components of R1.2 (R1.2.1 or R1.2.2). OR The responsible entity failed to include in their methodology three of the	The Transmission Owner or Generation Owner does not have a documented Facility Ratings Methodology for use in developing facility ratings. The responsible entity's rating methodology failed to recognize a facility's rating based on the most

Violation Severity Level Matrix (FAC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		shall include all of the following:			subcomponents of R1.3, (R1.3.1 to R1.3.5).~~Not applicable.~~	limiting component rating as required in R1.1. OR The responsible entity rating methodology did not address the components of R1.2, (R1.2.1 and R1.2.2). OR The responsible entity failed to include in their methodology four or more of the subcomponents of R1.3, (R1.3.1 to R1.3.5). ~~The Transmission Owner or Generation Owner does not have a documented Facility Ratings Methodology for use in developing facility ratings.~~
FAC-008-1	R1.1.	A statement that a Facility Rating shall equal the most limiting applicable Equipment Rating of the individual equipment that	~~The Facility Rating methodology respects the most limiting applicable Equipment Rating of the individual equipment that~~	N~~ot applicable.~~/A	N~~ot applicable.~~/A	~~The Transmission Owner or Generator Owner has failed to demonstrate that its Facility Rating Methodology respects the most~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		comprises that Facility.	~~comprises that Facility but there is no statement in the documentation of the methodology that states this.~~ N/A			~~limiting applicable Equipment Rating of the individual equipment that comprises that Facility.~~ N/A
FAC-008-1	R1.2.	The method by which the Rating (of major BES equipment that comprises a Facility) is determined.	N~~ot applicable.~~/A	N~~ot applicable.~~/A	N~~ot applicable.~~/A	~~The Transmission Owner's or Generation Owner's Facility Ratings Methodology does not specify the manner in which a rating is determined.~~N/A
FAC-008-1	R1.2.1.	The scope of equipment addressed shall include, but not be limited to, generators, transmission conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.	N~~ot applicable.~~/A	~~The Transmission Owner or Generator Owner has demonstrated that it has a Facility Rating Methodology that includes methods of rating BES equipment but the equipment rating methods don't address one of the applicable required devices.~~N/A	~~The Transmission Owner or Generator Owner has demonstrated the existence of methods of rating equipment but the equipment rating methods don't address two of the applicable required devices.~~N/A	~~The Transmission Owner or Generator Owner has demonstrated the existence of methods of rating equipment but the equipment rating methods don't address more than two of the applicable required devices.~~N/A
FAC-008-1	R1.2.2.	The scope of Ratings addressed shall include, as a minimum, both Normal and	N~~ot applicable.~~/A	~~The Transmission Owner or Generator Owner's equipment Ratings methodology does~~	~~The Transmission Owner or Generator Owner's equipment Ratings methodology fails to~~	~~The Transmission Owner or Generator Owner's equipment Ratings methodology fails to~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Emergency Ratings.		~~address a methodology for determining emergency ratings but fails to include a methodology for determining normal ratings for its BES equipment.~~N/A	~~include a methodology for determining emergency ratings for of its BES equipment.~~N/A	~~demonstrate the inclusion of any method for determining normal or emergency ratings for of its BES equipment.~~N/A
FAC-008-1	R1.3.	Consideration of the following:	~~The rating methodology did not consider one of the sub requirements.~~N/A	~~The rating methodology did not consider two of the sub requirements.~~N/A	~~The rating methodology did not consider three of the sub requirements.~~N/A	~~The rating methodology did not consider four or more of the sub requirements.~~N/A
FAC-008-1	R1.3.1.	Ratings provided by equipment manufacturers.	N~~ot applicable.~~/A	N~~ot applicable.~~/A	N~~ot applicable.~~/A	~~The Transmission Owner or Generator Owner has failed to demonstrate the existence (in its Facility Rating Methodology) of how it considered ratings provided by equipment manufacturers.~~N/A
FAC-008-1	R1.3.2.	Design criteria (e.g., including applicable references to industry Rating practices such as manufacturer's warranty, IEEE, ANSI or other standards).	N~~ot applicable.~~/A	N~~ot applicable.~~/A	N~~ot applicable.~~ /A	~~The Transmission Owner or Generator Owner has failed to demonstrate how it considered design criteria in developing its equipment Ratings.~~N/A

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FAC-008-1	R1.3.3.	Ambient conditions.	N~~ot applicable.~~/A	N~~ot applicable.~~/A	N~~ot applicable.~~ /A	~~The Transmission Owner or Generator Owner has failed to demonstrate how it considered ambient conditions in developing its equipment Ratings.~~N/A
FAC-008-1	R1.3.4.	Operating limitations.	N~~ot applicable.~~/A	N~~ot applicable.~~/A	N~~ot applicable.~~ /A	~~The Transmission Owner or Generator Owner has failed to demonstrate how it considered operating limitations in developing its equipment Ratings.~~N/A
FAC-008-1	R1.3.5.	Other assumptions.	N~~ot applicable.~~/A	N~~ot applicable.~~/A	N~~ot applicable.~~ /A	~~The Transmission Owner or Generator Owner has failed to demonstrate how it considered other assumptions in developing its equipment Ratings.~~N/A
FAC-008-1	R2.	The Transmission Owner and Generator Owner shall each make its Facility Ratings Methodology available for	The ~~Transmission Owner or Generator Owner has~~responsible entity made ~~its~~the Facility Ratings Methodology	The responsible entity made the Facility Ratings Methodology available within more than 25 business days but	The responsible entity made the Facility Ratings Methodology available within more than 35 business days but	The ~~Transmission Owner or Generator Owner has not made its~~ responsible entity failed to make available the Facility ~~Rating~~Ratings

Violation Severity Level Matrix (FAC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		inspection and technical review by those Reliability Coordinators, Transmission Operators, Transmission Planners, and Planning Authorities that have responsibility for the area in which the associated Facilities are located, within 15 business days of receipt of a request.	available ~~to all required entities but not~~ within more than 15 business days ~~of~~but less than or equal to 25 business days after a request.	less than or equal to 35 business days after a request. ~~The Transmission Owner or Generator Owner has not made its Facility Ratings Methodology available to one of the required entities, but did make the methodology available to all other required entities.~~	less than or equal to 45 business days after a request. ~~The Transmission Owner or Generator Owner fails to provide its Facility Ratings Methodology available to two or more of the required entities.~~	Methodology available ~~to any of the required entities~~ in ~~accordance with Requirement R2 within 60~~more than 45 business days ~~of receipt of~~after a request.
FAC-008-1	R3.	If a Reliability Coordinator, Transmission Operator, Transmission Planner, or Planning Authority provides written comments on its technical review of a Transmission Owner's or Generator Owner's Facility Ratings Methodology, the Transmission Owner or Generator Owner shall provide a written response to that commenting	The responsible entity provided a response ~~as required but took longer~~in more than 45 ~~business~~calendar days but less than or equal to 60 calendar days after a request.	The responsible entity provided a response in more than 60 calendar days but less than or equal to 70 calendar days after a request. OR The responsible entity provided a response within 45 calendar days, and the response indicated that a change will not be made to the Facility Ratings Methodology but did	The responsible entity provided a response in more than 70 calendar days but less than or equal to 80 calendar days after a request. OR The responsible entity provided a response within 45 calendar days, but the response did not indicate whether a change will be made to the Facility Ratings Methodology.	The responsible entity ~~did not~~ failed to provide ~~any evidence to demonstrate that it provided~~ a response ~~to a comment on its Facility Ratings Methodology~~as required in ~~accordance with Requirement R3 within 90 business~~more than 80 calendar days after a request.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		entity within 45 calendar days of receipt of those comments. The response shall indicate whether a change will be made to the Facility Ratings Methodology and, if no change will be made to that Facility Ratings Methodology, the reason why.		not indicate why no change will be made.		
FAC-009-1	R1.	The Transmission Owner and Generator Owner shall each establish Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings Methodology.	The ~~Transmission Owner or Generator Owner developed~~responsible entity failed to establish Facility Ratings ~~for all its solely owned and jointly owned Facilities, but the ratings weren't~~ consistent with the associated Facility ~~Rating~~Ratings Methodology ~~in one minor area.~~for 5% or less of its solely owned and jointly owned Facilities.	~~The Transmission Owner or Generator Owner developed Facility Ratings for most, but not all of its solely and jointly owned Facilities following the associated Facility Ratings Methodology~~ ~~OR~~ ~~the Transmission Owner or Generator Owner developed Facility Ratings for all its solely and jointly owned Facilities but failed~~	The ~~Transmission Owner or Generator Owner developed~~responsible entity failed to establish Facility Ratings ~~following~~consistent with the associated Facility Ratings Methodology ~~but failed to develop any Facility Ratings~~ for ~~a significant number~~more than 10% up to (and including) 15% of its solely ~~and jointly owned Facilities~~	~~The Transmission Owner or Generator Owner has failed to demonstrate that it developed any Facility Ratings using its Facility Rating Methodology~~The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings Methodology for more than 15% of its solely owned and jointly owned Facilities.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				~~to follow the associated Facility Ratings Methodology in one significant area.~~ The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings Methodology for more than 5% up to (and including) 10% of its solely owned and jointly owned Facilities.	~~OR the Transmission Owner or Generator Owner has developed Facility Ratings for all its solely~~ owned and jointly owned Facilities~~, but failed to follow the associated Facility Ratings Methodology in more than one significant area~~.	
FAC-013-1	R1.	The Reliability Coordinator and Planning Authority shall each establish a set of inter-regional and intra-regional Transfer Capabilities that is consistent with its current Transfer Capability Methodology.	The ~~Reliability Coordinator or Planning Authority~~responsible entity has established a set of Transfer Capabilities, ~~but one or more Transfer Capabilities,~~ but ~~not more than 25%~~5% or less of all Transfer Capabilities required to be established, are ~~not~~ inconsistent with the current Transfer Capability	The ~~Reliability Coordinator or Planning Authority~~responsible entity has established a set of Transfer Capabilities, but more than ~~25% of those Transfer Capabilities, but not more than 50~~5% up to (and including) 10% of all Transfer Capabilities required to be established, are ~~not~~ inconsistent with the current Transfer	The ~~Reliability Coordinator or Planning Authority~~responsible entity has established a set of Transfer Capabilities, but more than ~~50% of those Transfer Capabilities, but not more than 75~~10% up to (and including) 15% of all Transfer Capabilities required to be established, are ~~not~~ inconsistent with the current Transfer	The ~~Reliability Coordinator or Planning Authority~~responsible entity has established a set of Transfer Capabilities, but more than ~~75~~15% of those Transfer Capabilities are not consistent with the current Transfer Capability Methodology OR The ~~Reliability~~

Violation Severity Level Matrix (FAC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			Methodology.	Capability Methodology.	Capability Methodology.	~~Coordinator or Planning Authority~~responsible entity has not established a set of Transfer Capabilities.
FAC-013-1	R2.1.	The Reliability Coordinator shall provide its Transfer Capabilities to its associated Regional Reliability Organization(s), to its adjacent Reliability Coordinators, and to the Transmission Operators, Transmission Service Providers and Planning Authorities that work in its Reliability Coordinator Area.	~~Not applicable.~~The responsible entity failed to provide Transfer Capabilities to 5% or less of the required entities.	The ~~Reliability Coordinator provided its~~responsible entity failed to provide Transfer Capabilities to ~~all but one~~more than 5% up to (and including) 10% of the required entities.	The ~~Reliability Coordinator~~responsible entity failed to provide ~~its~~ Transfer Capabilities to more than ~~one~~10% up to (and including) 15% of the required entities.	The ~~Reliability Coordinator provided its~~responsible entity failed to provide Transfer Capabilities to ~~none~~more than 15% of the required entities.
FAC-013-1	R2.2.	The Planning Authority shall provide its Transfer Capabilities to its associated Reliability Coordinator(s) and Regional Reliability	~~Not applicable.~~The responsible entity failed to provide Transfer Capabilities 5% or less of the required entities.	The ~~Planning Authority provided its~~responsible entity failed to provide Transfer Capabilities to ~~all but one~~more than 5% up to (and including) 10% of	The ~~Planning Authority~~responsible entity failed to provide ~~its~~ Transfer Capabilities to more than ~~one~~10% up to (and including) 15% of the required	The ~~Planning Authority provided its~~responsible entity failed to provide Transfer Capabilities to ~~none~~more than 15% of the required entities.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Organization(s), and to the Transmission Planners and Transmission Service Provider(s) that work in its Planning Authority Area.		the required entities.	entities.	

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
INT-003-2	R1.	Each Receiving Balancing Authority shall confirm Interchange Schedules with the Sending Balancing Authority prior to implementation in the Balancing Authority's ACE equation.	~~There shall be a separate Lower VSL, if either of the following conditions exists: One instance of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2. One instance of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2~~N/A	The responsible entity confirmed Interchange Schedule with the Sending Balancing Authority ~~There shall be a separate Moderate VSL, if either of the following conditions exists: Two instances of entering a schedule into its~~ ACE equation ~~without confirming the schedule as specified in R1, R1.1, R1.1.1~~ and ~~R1.1.2. Two instances of not coordinating the~~ the responsible Entities reached agreement; and coordinated the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2; but the agreement did not include one of the elements required in sub-	~~There shall be a separate High VSL, if either of the following conditions exists: Three instances of entering a schedule into its~~ The responsible entity confirmed Interchange Schedule with the Sending Balan~~a~~cing Authority prior to implementation in the Balancing Authority ACE equation ~~without confirming the schedule as specified in R1, R1.1, R1.1.1~~ and the responsible Entities reached agreement but did ~~R1.1.2. Three instances of~~ not ~~coordinating~~ coordinate the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2.	The responsible entity failed to confirm Interchange Schedule with the Sending Balancing Authority prior to implementation in the Authority's ACE equation. OR The responsible entity failed to agree on the interchange as received from the Interchange Authority prior to implementation in the Balancing Authority's ACE equation. ~~There shall be a separate Severe VSL, if either of the following conditions exists: Four or more instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2. Four or more instances of not coordinating the~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				requirements R1.1.1 or R1.1.2.		~~Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2~~
INT-003-2	R1.1.	The Sending Balancing Authority and Receiving Balancing Authority shall agree on Interchange as received from the Interchange Authority, including:	~~The Balancing Authority experienced one instance of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.~~N/A	~~The Balancing Authority experienced two instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.~~N/A	~~The Balancing Authority experienced three instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.~~N/A	~~The Balancing Authority experienced four instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.~~N/A
INT-003-2	R1.1.1.	Interchange Schedule start and end time.	~~The Balancing Authority experienced one instance of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.~~N/A	~~The Balancing Authority experienced two instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.~~N/A	~~The Balancing Authority experienced three instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.~~N/A	~~The Balancing Authority experienced four instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.~~N/A
INT-003-2	R1.1.2.	Energy profile.	~~The Balancing Authority experienced one instance of entering a schedule into its ACE equation~~	~~The Balancing Authority experienced two instances of entering a schedule into its ACE equation~~	~~The Balancing Authority experienced three instances of entering a schedule into its ACE equation~~	~~The Balancing Authority experienced four instances of entering a schedule into its ACE equation~~

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			~~without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.~~N/A	~~without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.~~N/A	~~without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.~~N/A	~~without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2.~~N/A
INT-003-2	R1.2.	If a high voltage direct current (HVDC) tie is on the Scheduling Path, then the Sending Balancing Authorities and Receiving Balancing Authorities shall coordinate the Interchange Schedule with the Transmission Operator of the HVDC tie.	~~The sending or receiving Balancing Authority experienced one instance of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2~~ N/A	~~The sending or receiving Balancing Authority experienced two instances of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2~~ N/A	~~The sending or receiving Balancing Authority experienced three instances of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2~~ N/A	~~The sending or receiving Balancing Authority experienced four instances of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2~~ N/A
INT-004-2	R2.	The Purchasing-Selling Entity responsible for tagging a Dynamic Interchange Schedule shall ensure the tag is updated for the next available scheduling hour and future hours when any one of the following occurs:	~~The Purchase-Selling entity failed to update the tags when required less than 25% of times it was required, as determined in R2.1, R2.2, or R2.3.~~N/A	~~The Purchase-Selling entity failed to update the tags when required 25% or more and less than 50% of the times it was required, as determined in R2.1, R2.2, or R2.3.~~N/A	The ~~Purchase-Selling~~responsible entity failed to update the tag~~s~~ when required ~~50% or more but less than~~75% of the times it was required, as ~~determined in~~by sub-requirements R2.1~~,~~ or R2.2~~, or R2.3~~.	The ~~Purchase-Selling~~responsible entity failed to update the tag~~s~~ when required ~~75% or more of the times it was required, as determined in R2.1, R2.2, or~~by sub-requirement R2.3.
INT-004-2	R2.1.	The average energy	~~The Purchase-~~	~~The Purchase-~~	~~The Purchase-~~	~~The Purchase-~~

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		profile in an hour is greater than 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than +10%.	~~Selling entity failed to update the tags when required less than 25% of times it was required.~~N/A	~~Selling entity failed to update the tags when required 25% or more and less than 50% of the times it was required.~~N/A	~~Selling entity failed to update the tags when required 50% or more but less than75% of the times it was required.~~N/A	~~Selling entity failed to update the tags when required 75% or more of the times it was required.~~N/A
INT-004-2	R2.2.	The average energy profile in an hour is less than or equal to 250 MW and in that hour the actual hourly integrated energy deviates from the hourly average energy profile indicated on the tag by more than +25 megawatt-hours.	~~The Purchase-Selling entity failed to update the tags when required less than 25% of times it was required.~~N/A	~~The Purchase-Selling entity failed to update the tags when required 25% or more and less than 50% of the times it was required.~~N/A	~~The Purchase-Selling entity failed to update the tags when required 50% or more but less than75% of the times it was required.~~N/A	~~The Purchase-Selling entity failed to update the tags when required 75% or more of the times it was required.~~N/A
INT-004-2	R2.3.	A Reliability Coordinator or Transmission Operator determines the deviation, regardless of magnitude, to be a reliability concern and notifies the Purchasing-Selling Entity of that determination and	~~The Purchase-Selling entity failed to update the tags when required less than 25% of times it was required.~~N/A	~~The Purchase-Selling entity failed to update the tags when required 25% or more and less than 50% of the times it was required.~~N/A	~~The Purchase-Selling entity failed to update the tags when required 50% or more but less than75% of the times it was required.~~N/A	~~The Purchase-Selling entity failed to update the tags when required 75% or more of the times it was required.~~N/A

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		the reasons.				
INT-005-3	R1.1.	When a Balancing Authority or Reliability Coordinator initiates a Curtailment to Confirmed or Implemented Interchange for reliability, the Interchange Authority shall distribute the Arranged Interchange information for reliability assessment only to the Source Balancing Authority and the Sink Balancing Authority.	~~The Interchange Authority experienced one occurrence of not distributing information to all involved reliability entities.~~N/A	~~The Interchange Authority experienced two occurrences of not distributing information to all involved reliability entities~~ N/A	~~The Interchange Authority experienced three occurrences of not distributing information to all involved reliability entities~~ The Responsible Entity initiated a Curtailment to Confirmed or Implemented Interchange for reliability but the Interchange Authority failed to distribute the Arranged Interchange information to the Source Balancing Authority or the Sink Balancing Authority.	~~The Interchange Authority experienced four occurrences of not distributing information to all involved reliability entities~~ The Responsible Entity initiated a Curtailment to Confirmed or Implemented Interchange for reliability but the Interchange Authority failed to distribute the Arranged Interchange information to the Source Balancing Authority and the Sink Balancing Authority.
INT-009-1	R1.	The Balancing Authority shall implement Confirmed Interchange as received from the Interchange Authority.	~~The Balancing Authority experienced one occurrence of not implementing a Confirmed Interchange as received from the~~	~~The Balancing Authority experienced two occurrences of not implementing a Confirmed Interchange as received from the~~	~~The Balancing Authority experienced three occurrences of not implementing a Confirmed Interchange as received from the~~	The ~~Balancing Authority experienced four occurrences of not implementing~~respon sible entity failed to implement a Confirmed

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			~~Interchange Authority.~~N/A	~~Interchange Authority.~~N/A	~~Interchange Authority.~~N/A	Interchange as received from the Interchange Authority.
INT-010-1	R1.	The Balancing Authority that experiences a loss of resources covered by an energy sharing agreement shall ensure that a request for an Arranged Interchange is submitted with a start time no more than 60 minutes beyond the resource loss. If the use of the energy sharing agreement does not exceed 60 minutes from the time of the resource loss, no request for Arranged Interchange is required.	The ~~Balancing Authority~~responsible entity that experienced a loss of ~~resource~~ resources that exceeded 60 minutes and was covered by an energy sharing agreement ~~failed one time to submit~~ ensured that a request for an Arranged Interchange ~~within~~was submitted, but with a start time that was more than 60 minutes but less than 75 minutes beyond the ~~specified time period.~~resource loss.	The ~~Balancing Authority~~responsible entity that experienced a loss of ~~resource~~ resources that exceeded 60 minutes and was covered by an energy sharing agreement ~~failed two times to submit~~ensured that a request for an Arranged Interchange ~~within the specified~~was submitted, but with a start time ~~period.~~that was 75 minutes or more, but less than 90 minutes beyond the resource loss.	The ~~Balancing Authority~~responsible entity that experienced a loss of ~~resource~~ resources that exceeded 60 minutes and was covered by an energy sharing agreement ~~failed three times to submit~~ensured that a request for an Arranged Interchange ~~within the specified~~was submitted, but with a start time ~~period.~~that was 90 minutes or more, but less than 105 minutes beyond the resource loss.	The ~~Balancing Authority~~responsible entity that experienced a loss of ~~resource~~ resources that exceeded 60 minutes and was covered by an energy sharing agreement ~~failed four or more times to submit~~ensured that a request for an Arranged Interchange ~~within the specified~~was submitted, but with a start time ~~period.~~that was more than 105 minutes beyond the resource loss. OR The responsible entity that experienced a loss of resources that exceeded 60 minutes and was covered by an energy sharing

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						agreement, failed to ensure that a request for an Arranged Interchange was submitted.
INT-010-1	R2.	For a modification to an existing Interchange schedule that is directed by a Reliability Coordinator for current or imminent reliability-related reasons, the Reliability Coordinator shall direct a Balancing Authority to submit the modified Arranged Interchange reflecting that modification within 60 minutes of the initiation of the event.	~~The Reliability Coordinator failed one time to direct the submittal of a new or modified Arranged Interchange; or the Balancing Authority failed one time to submit the modified schedule as directed.~~N/A	~~The Reliability Coordinator failed two times to direct the submittal of a new or modified Arranged Interchange; or the Balancing Authority failed two times to submit the modified schedule as directed.~~N/A	~~The Reliability Coordinator failed three times to direct the submittal of a new or modified Arranged Interchange; or the Balancing Authority failed three times to submit the modified schedule as directed.~~N/A	~~The Reliability Coordinator failed four times to direct the submittal of a new or modified Arranged Interchange; or the Balancing Authority failed four times to submit the modified schedule as directed.~~The responsible entity failed to direct a Balancing Authority to submit the modified Arranged Interchange reflecting the modification, within 60 minutes of the initiation of the event.
INT-010-1	R3.	For a new Interchange schedule that is directed by a Reliability Coordinator for current or imminent	~~The Reliability Coordinator failed one time to direct the submittal of a new or modified Arranged Interchange; or the~~	~~The Reliability Coordinator failed two times to direct the submittal of a new or modified Arranged~~	~~The Reliability Coordinator failed three times to direct the submittal of a new or modified Arranged~~	~~The Reliability Coordinator failed four times to direct the submittal of a new or modified Arranged~~

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		reliability-related reasons, the Reliability Coordinator shall direct a Balancing Authority to submit an Arranged Interchange reflecting that Interchange schedule within 60 minutes of the initiation of the event.	~~Balancing Authority failed one time to submit a schedule as directed.~~N/A	~~Interchange ; or the Balancing Authority failed two times to submit a schedule as directed.~~N/A	~~Interchange ; or the Balancing Authority failed three times to submit a schedule as directed.~~N/A	~~Interchange; or the Balancing Authority failed four times or more to submit a schedule as directed.~~The responsible entity failed to direct a Balancing Authority to submit an Arranged Interchange reflecting the new Interchange schedule within 60 minutes of the initiation of the event.

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IRO-001-1.1	R5.	The Reliability Coordinator shall list within its reliability plan all entities to which the Reliability Coordinator has delegated required tasks.	~~2~~5% or less of the delegate entities are not identified in the reliability plan.	More than ~~25% but 50% or less~~5% up to (and including) 10% of the delegate entities are not identified in the reliability plan.	More than ~~50% but 75% or less~~10% up to (and including) 15% of the delegate entities are not identified in the reliability plan.	~~1.~~ There is no reliability plan ~~or 2.~~ . OR More than ~~75~~15% of the delegate entities are not identified in the reliability plan.
IRO-001-1.1	R6.	The Reliability Coordinator shall verify that all delegated tasks are carried out by NERC-certified Reliability Coordinator operating personnel.	~~N/A~~The Reliability Coordinator failed to demonstrate that 5% or less of its delegated tasks were being performed by NERC certified Reliability Coordinator operating personnel.	~~1.~~ The Reliability Coordinator ~~has~~ failed to demonstrate ~~at least one~~that more than 5% up to (and including) 10% of its delegated ~~task was~~tasks were being performed by NERC certified Reliability Coordinator operating personnel ~~or~~ ~~2. The Reliability Coordinator did not require the delegate entity to have NERC certified Reliability Coordinator~~	~~1.~~ The Reliability Coordinator ~~has~~ failed to demonstrate ~~at least one~~that more than 10% up to (and including) 15% of its delegated ~~task was performed by NERC certified Reliability Coordinator operating personnel and did not require the delegate entity to have NERC certified Reliability Coordinator operating personnel~~ ~~or~~ ~~2. The Reliability Coordinator has~~	The Reliability Coordinator ~~has~~ failed to demonstrate ~~any~~that more than 15% of its delegated tasks were being performed by NERC certified Reliability Coordinator operating personnel ~~and did not require the delegate entity to have NERC certified Reliability Coordinator operating personnel~~.

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				~~operating personnel~~.	~~failed to demonstrate at least two delegated task~~tasks were being performed by NERC certified Reliability Coordinator operating personnel.	
IRO-001-1.1	R8.	Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall comply with Reliability Coordinator directives unless such actions would violate safety, equipment, or regulatory or statutory requirements. Under these circumstances, the Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, or Purchasing-Selling Entity shall immediately inform the Reliability Coordinator of the inability to perform the directive so that the Reliability Coordinator may implement alternate remedial actions.	~~Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities followed the Reliability Coordinators directive with a delay not caused by equipment problems but did notify the Reliability Coordinator of the delay.~~N/A	~~Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities followed the Reliability Coordinators directive with a delay not caused by equipment problems and did not notify the Reliability Coordinator of the delay.~~The responsible entity	~~Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities followed the majority of the Reliability Coordinators directive and did not notify the Reliability Coordinator that it could not fully follow the directive because it would violate safety,~~	~~Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities~~The responsible entity did not follow the Reliability ~~Coordinators~~Coordinator's directive ~~and did not notify the Reliability Coordinator that it could not follow the directive because it would~~

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				could not comply with a directive due to qualified reasons (violation of safety, equipment or regulatory or statutory requirements) and did not immediately inform the Reliability Coordinator.	~~equipment, statutory or regulatory requirements.~~N/A	~~violate safety, equipment, statutory or regulatory requirements~~.
IRO-001-1.1	R9.	The Reliability Coordinator shall act in the interests of reliability for the overall Reliability Coordinator Area and the Interconnection before the interests of any other entity.	N/A	N/A	N/A	The Reliability Coordinator did not act in the interests of reliability for the overall Reliability Coordinator Area and the Interconnection before the interests of one or more other entities.
IRO-002-1	R1.	Each Reliability Coordinator shall have adequate communications facilities (voice and data links) to appropriate entities within its Reliability Coordinator Area. These communications facilities shall be staffed and available to act in addressing a real-time	The Reliability Coordinator ~~has~~ demonstrated that it has adequate voice communication facilities ~~for both voice~~ and ~~data exist to all~~staff but is deficient by 5% or less of its needed data links for at least one of the	The Reliability Coordinator ~~has failed to demonstrate~~demonstrated that ~~is has: 1) Voice~~it has adequate voice communication	The Reliability Coordinator ~~has failed to demonstrate~~demonstrated that ~~is has: 1) Voice~~it has adequate voice communication	~~The Reliability Coordinator has failed to demonstrate that is has: 1) Voice communication links with more~~

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		emergency condition.	appropriate entities ~~and that they are staffed and available but they are less than adequate.~~ within its Reliability Coordinator Area.	facilities and staff but is deficient with more than 5% up to (and including) 10% of its needed data links ~~with~~ for at least one of the appropriate ~~entity or 2) Data links with one appropriate entity.~~entities within its Reliability Coordinator Area.	facilities and staff but is deficient for more than 10% up to (and including) 15% of its needed data links ~~with two~~for at least one of the appropriate entities ~~or 2) Data links with two appropriate entities.~~within its Reliability Coordinator Area.	~~than two appropriate entities or 2) Data links with more than two appropriate entities or 3) Communication facilities are not staffed or 4) Communication facilities are not ready.~~The Reliability Coordinator demonstrated that it has adequate voice communication facilities and staff but is deficient for more than 15% of its needed data links for at least one of the appropriate entities with which it interfaces. OR The Reliability Coordinator

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						demonstrated that it has adequate voice and data communications facilities with all appropriate entities within its Reliability Coordinator Area but failed to have sufficient staff to address a real-time emergency event. OR The Reliability Coordinator failed to demonstrate it has adequate voice communications facilities with appropriate entities within its Reliability Coordinator Area.
IRO-002-1	R2.	Each Reliability Coordinator shall determine the data requirements to support its reliability coordination tasks and shall request such data from its Transmission Operators, Balancing Authorities, Transmission Owners, Generation Owners, Generation Operators, and	The Reliability Coordinator ~~demonstrated~~failed to demonstrate that it ~~1)~~ determined ~~its~~ and requested the data requirements ~~and requested that data from its Transmission Operators,~~	The Reliability Coordinator ~~demonstrated~~failed to demonstrate that it determined ~~the majority but not all of its~~ and requested the data	~~The Reliability Coordinator demonstrated that it determined 1) some but less than the majority of its data requirements~~	The Reliability Coordinator failed to demonstrate that it ~~1)~~ determined ~~its~~and requested the data requirements

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		Load-Serving Entities, or adjacent Reliability Coordinators.	~~Balancing Authorities, Transmission Owners, Generation Owners, Generation Operators, and Load-Serving Entities or Adjacent Reliability Coordinators with a material impact on the Bulk Electric System in its Reliability Coordination Area but did not request the data from Transmission Operators, Balancing Authorities, Transmission Owners, Generation Owners, Generation Operators, and Load-Serving Entities or Adjacent Reliability Coordinators with minimal impact on the Bulk Electric System in its Reliability Coordination Area or 2) determined its data requirements necessary to perform~~needed to support its reliability ~~functions with the exceptions~~coordination tasks from **One** of ~~data that may be needed for administrative purposes such as data reporting.~~the applicable entities with which it interfaces.	requirements ~~necessary~~needed to support its reliability coordination ~~functions and requested that data~~tasks from ~~**its Transmission Operators, Balancing Authorities, Transmission Owners, Generation Owners, Generation Operators, and Load-Serving Entities or Adjacent Reliability Coordinators.**~~**Two** of the applicable entities with which it interfaces.	~~necessary to support its reliability coordination functions and requested that data from its Transmission Operators, Balancing Authorities, Transmission Owners, Generation Owners, Generation Operators, and Load-Serving Entities or Adjacent Reliability Coordinators or 2) all of its data requirements necessary to support its reliability coordination functions but failed to demonstrate that it requested data from two of its Transmission Operators,~~	~~necessary~~needed to support its reliability coordination ~~functions and requested that data~~tasks from ~~**its Transmission Operators, Balancing Authorities, Transmission Owners, Generation Owners, Generation Operators, and Load-Serving Entities or Adjacent Reliability Coordinators or 2) requested the data from three~~**Four** **or more** of ~~its Transmission Operators, Balancing Authorities, Transmission Owners, Generation~~

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					~~Balancing Authorities, Transmission Owners, Generation Owners, Generation Operators, and Load-Serving Entities or Adjacent Reliability Coordinators.~~The Reliability Coordinator failed to demonstrate that it determined and requested the data requirements needed to support its reliability coordination tasks from **Three** of the applicable entities with which it interfaces.	~~Owners, Generation Operators, and Load-Serving Entities or Adjacent Reliability Coordinators.~~the applicable entities with which it interfaces.
IRO-002-1	R3.	Each Reliability Coordinator – or its Transmission Operators and Balancing Authorities – shall provide, or arrange provisions for, data exchange to other Reliability Coordinators or Transmission Operators and Balancing Authorities via a secure network.	~~N/A~~The responsible entity failed to demonstrate it provided or arranged provision for the exchange of data with 5% or less of the other Reliability Coordinators or Transmission Operators and Balancing Authorities.	The ~~Reliability Coordinator or designated Transmission Operator and Balancing Authority has~~responsible	The ~~Reliability Coordinator or designated Transmission Operator and Balancing Authority has~~responsible	The ~~Reliability Coordinator or designated Transmission Operator and Balancing Authority has~~responsible

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				entity failed to demonstrate it provided or arranged provision for the exchange of data with ~~one~~more than 5% up to (and including) 10% of the other Reliability Coordinators or Transmission Operators and Balancing Authorities.	entity failed to demonstrate it provided or arranged provision for the exchange of data with ~~two~~more than 10% up to (and including) 15% of the other Reliability Coordinators or Transmission Operators and Balancing Authorities.	entity failed to demonstrate it provided or arranged provision for the exchange of data with ~~three~~more than 15% of the other Reliability Coordinators or Transmission Operators and Balancing Authorities.
IRO-002-1	R4.	Each Reliability Coordinator shall have multi-directional communications capabilities with its Transmission Operators and Balancing Authorities, and with neighboring Reliability Coordinators, for both voice and data exchange as required to meet reliability needs of the Interconnection.	~~N/A~~The Reliability Coordinator has failed to demonstrate multi-directional communication capabilities to 5% or less of the applicable entities with which it interfaces.	The Reliability Coordinator has failed to demonstrate multi-directional communication capabilities to ~~one~~more than 5% up to (and including) 10% of the ~~Transmission Operators and Balancing Authorities in its Reliability Coordinator Area and~~applicable entities with	The Reliability Coordinator has failed to demonstrate multi-directional communication capabilities to ~~two or~~ more than 10% up to (and including) 15% of the ~~Transmission Operators and Balancing Authorities in its Reliability Coordinator Area and~~applicable entities with	The Reliability Coordinator has failed to demonstrate multi-directional communication capabilities ~~to all~~with more than 15% of the ~~Transmission Operators and Balancing Authorities in its Reliability Coordinator Area and with all neighboring Reliability~~

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				~~neighboring Reliability Coordinators.~~ which it interfaces.	~~neighboring Reliability Coordinators.~~ which it interfaces.	~~Coordinators.~~ applicable entities with which it interfaces.
IRO-002-1	R5.	Each Reliability Coordinator shall have detailed real-time monitoring capability of its Reliability Coordinator Area and sufficient monitoring capability of its surrounding Reliability Coordinator Areas to ensure that potential or actual System Operating Limit or Interconnection Reliability Operating Limit violations are identified. Each Reliability Coordinator shall have monitoring systems that provide information that can be easily understood and interpreted by the Reliability Coordinator's operating personnel, giving particular emphasis to alarm management and awareness systems, automated data transfers, and synchronized information systems, over a redundant and highly reliable infrastructure.	The Reliability Coordinator's SOL/IROL monitoring systems provide information in a way that is not easily understood and interpreted by the Reliability Coordinator's operating personnel ~~or particular emphasis was not given to alarm management and awareness systems, automated data transfers and synchronized information systems.~~ .	~~The Reliability Coordinator has failed to demonstrate that is has detailed real-time monitoring capabilities in its Reliability Coordinator Area and sufficient monitoring capabilities of its surrounding Reliability Coordinator Areas to ensure that one potential or actual SOL or IROL violation is not identified.~~ The Reliability Coordinator's SOL/IROL monitoring systems did not give particular emphasis to One of the following:	~~The Reliability Coordinator has failed to demonstrate that is has detailed real-time monitoring capabilities in its Reliability Coordinator Area and sufficient monitoring capabilities of its surrounding Reliability Coordinator Areas to ensure that two or more potential and actual SOL and IROL violations are not identified.~~ The Reliability Coordinator's SOL/IROL monitoring systems did not give particular emphasis to Two of the following:	~~The Reliability Coordinator has failed to demonstrate that is has detailed real-time monitoring capabilities in its Reliability Coordinator Area and sufficient monitoring capabilities of its surrounding Reliability Coordinator Areas to ensure that all potential and actual SOL and IROL violations are identified.~~ The Reliability Coordinator's SOL/IROL monitoring systems did not give particular emphasis to any of the following: • alarm

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				• alarm management and awareness systems • automated data transfers • synchronized information systems	• alarm management and awareness systems • automated data transfers • synchronized information systems	management and awareness systems • automated data transfers • synchronized information systems. OR The Reliability Coordinator's SOL/IROL monitoring systems were not implemented over a highly reliable redundant infrastructure.
IRO-002-1	R7.	Each Reliability Coordinator shall have adequate analysis tools such as state estimation, pre- and post-contingency analysis capabilities (thermal, stability, and voltage), and wide-area overview displays.	~~The Reliability Coordinator failed to demonstrate that it has:~~ ~~1) analysis tools capable of assessing all pre-contingency flows,~~ ~~2) analysis tools capable of assessing all post-contingency flows, or~~ ~~3) all necessary wide-area overview displays exist.~~N/A	~~The Reliability Coordinator failed to demonstrate that it has:~~ ~~1) analysis tools capable of assessing the majority of pre-contingency flows,~~ ~~2) analysis tools capable of assessing the majority of post-contingency flows,~~	~~The Reliability Coordinator failed to demonstrate that it has:~~ ~~1) analysis tools capable of assessing a minority of pre-contingency flows,~~ ~~2) analysis tools capable of assessing a minority of post-contingency flows,~~	The Reliability Coordinator failed to demonstrate that it has~~:~~ ~~1)~~ adequate analysis tools ~~capable of assessing any pre-contingency flows,~~ ~~2) analysis tools capable of assessing any post-contingency flows, or~~

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				~~or~~ ~~3) the majority of necessary wide-area overview displays exist.~~N/A	~~or~~ ~~3) a minority of necessary wide-area overview displays exist.~~N/A	~~3) any necessary wide~~such as: • State estimation • Pre-contingency analysis capability (thermal, stability, and • voltage); • Post-contingency analysis capability (thermal, stability, and voltage), • Wide-area overview displays~~ exist~~.
IRO-002-1	R8.	Each Reliability Coordinator shall continuously monitor its Reliability Coordinator Area. Each Reliability Coordinator shall have provisions for backup facilities that shall be exercised if the main monitoring system is unavailable. Each Reliability Coordinator shall ensure SOL and IROL monitoring and derivations continue if the	~~The Reliability Coordinator failed to demonstrate that:~~ ~~1) it or a delegated entity monitored SOLs when the main monitoring system was unavailable or~~ ~~2) it has provisions to monitor SOLs when the main monitoring system is not available.~~.N/A	The Reliability Coordinator ~~failed to demonstrate that:~~ ~~1) it or a delegated entity monitored one IROL~~ demonstrated provisions for back-up facilities, but it failed to	~~The Reliability Coordinator failed to demonstrate that:~~ ~~1) it or a delegated entity monitored two or more IROLs when the main monitoring system was unavailable,~~ ~~2) it or a delegated~~	The Reliability Coordinator failed to demonstrate ~~that it continuously monitored its Reliability Authority Area.~~provisions for back-up facilities

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		main monitoring system is unavailable.		continuously monitor SOL/IROL conditions when the main monitoring system was unavailable ~~or 2) it has provisions to monitor one IROL when the main monitoring system is not available~~.	~~entity monitored SOLs and one IROL when the main monitoring system was unavailable 3) it has provisions to monitor two or more IROLs when the main monitoring system is not available, or 4) it has provisions to monitor SOLs and one IROL when the main monitoring system was unavailable.~~N/A	AND The Reliability Coordinator failed to continuously monitor SOL/IROL conditions when the main monitoring system was unavailable.
IRO-004-1	R1.	Each Reliability Coordinator shall conduct next-day reliability analyses for its Reliability Coordinator Area to ensure that the Bulk Electric System can be operated reliably in anticipated normal and Contingency event conditions. The Reliability Coordinator shall conduct Contingency analysis studies to identify potential interface and other SOL and IROL violations, including overloaded transmission lines and transformers, voltage and	The Reliability Coordinator failed to conduct next-day reliability analyses or contingency analysis for its Reliability Coordinator Area for one (1) day during a calendar month.	The Reliability Coordinator failed to conduct next-day reliability analyses or contingency analysis for its Reliability Coordinator Area for two (2) to three (3) days during a calendar month.	The Reliability Coordinator failed to conduct next-day reliability analyses or contingency analysis for its Reliability Coordinator Area for four (4) to five (5) days during a calendar month.	The Reliability Coordinator failed to conduct next-day reliability analyses or contingency analysis for its Reliability Coordinator Area for more than five (5) days during a calendar month.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		stability limits, etc.				
IRO-004-1	R2.	Each Reliability Coordinator shall pay particular attention to parallel flows to ensure one Reliability Coordinator Area does not place an unacceptable or undue Burden on an adjacent Reliability Coordinator Area.	N/A	N/A	N/A	The Reliability Coordinator failed to monitor parallel flows to ensure one Reliability Coordinator Area ~~does~~did not place an unacceptable or undue Burden on an adjacent Reliability Coordinator Area.
IRO-004-1	R3.	Each Reliability Coordinator shall, in conjunction with its Transmission Operators and Balancing Authorities, develop action plans that may be required, including reconfiguration of the transmission system, re-dispatching of generation, reduction or curtailment of Interchange Transactions, or reducing load to return transmission loading to within acceptable SOLs or IROLs.	The Reliability Coordinator, in conjunction with its Transmission Operators and Balancing Authorities, failed to develop action plans that may be required, including reconfiguration of the transmission system, re-dispatching of generation, reduction or curtailment of Interchange Transactions, or reducing load to return transmission loading to within acceptable SOLs or IROLs for one (1) day during a calendar month.	The Reliability Coordinator, in conjunction with its Transmission Operators and Balancing Authorities, failed to develop action plans that may be required, including reconfiguration of the transmission system, re-dispatching of generation, reduction or curtailment of Interchange Transactions, or	The Reliability Coordinator, in conjunction with its Transmission Operators and Balancing Authorities, failed to develop action plans that may be required, including reconfiguration of the transmission system, re-dispatching of generation, reduction or curtailment of Interchange Transactions, or	The Reliability Coordinator, in conjunction with its Transmission Operators and Balancing Authorities, failed to develop action plans that may be required, including reconfiguration of the transmission system, re-dispatching of generation, reduction or curtailment of Interchange Transactions, or

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				reducing load to return transmission loading to within acceptable SOLs or IROLs for two (2) to three (3) days during a calendar month.	reducing load to return transmission loading to within acceptable SOLs or IROLs for four (4) to five (5) days during a calendar month.	reducing load to return transmission loading to within acceptable SOLs or IROLs for more than five (5) days during a calendar month.
IRO-004-1	R4.	Each Transmission Operator, Balancing Authority, Transmission Owner, Generator Owner, Generator Operator, and Load-Serving Entity in the Reliability Coordinator Area shall provide information required for system studies, such as critical facility status, Load, generation, operating reserve projections, and known Interchange Transactions. This information shall be available by 1200 Central Standard Time for the Eastern Interconnection and 1200 Pacific Standard Time for the Western Interconnection.	The responsible entity in the Reliability Coordinator Area provided the information required for system studies, such as critical facility status, Load, generation, operating reserve projections, and known Interchange Transactions, but said information was provided after the required time as stated in IRO-004-1 R4 for one (1) day during a calendar month.	The responsible entity in the Reliability Coordinator Area provided the information required for system studies, such as critical facility status, Load, generation, operating reserve projections, and known Interchange Transactions, but said information was provided after the required time as stated in IRO-004-1 R4 for two (2) to three (3) days during a calendar month.	The responsible entity in the Reliability Coordinator Area provided the information required for system studies, such as critical facility status, Load, generation, operating reserve projections, and known Interchange Transactions, but said information was provided after the required time as stated in IRO-004-1 R4 for four (4) to five (5) days during a calendar month.	The responsible entity in the Reliability Coordinator Area provided the information required for system studies, such as critical facility status, Load, generation, operating reserve projections, and known Interchange Transactions, but said information was provided after the required time as stated in IRO-004-1 R4 for more than five (5) days during a calendar month.

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IRO-004-1	R5.	Each Reliability Coordinator shall share the results of its system studies, when conditions warrant or upon request, with other Reliability Coordinators and with Transmission Operators, Balancing Authorities, and Transmission Service Providers within its Reliability Coordinator Area. The Reliability Coordinator shall make study results available no later than 1500 Central Standard Time for the Eastern Interconnection and 1500 Pacific Standard Time for the Western Interconnection, unless circumstances warrant otherwise.	The Reliability Coordinator failed to share the results of its system studies, when conditions warranted or was requested, with other Reliability Coordinators and with Transmission Operators, Balancing Authorities, and Transmission Service Providers within its Reliability Coordinator Area for one (1) day during a calendar month.	The Reliability Coordinator failed to share the results of its system studies, when conditions warranted or was requested, with other Reliability Coordinators and with Transmission Operators, Balancing Authorities, and Transmission Service Providers within its Reliability Coordinator Area for two (2) to three (3) days during a calendar month.	The Reliability Coordinator failed to share the results of its system studies, when conditions warranted or was requested, with other Reliability Coordinators and with Transmission Operators, Balancing Authorities, and Transmission Service Providers within its Reliability Coordinator Area for four (4) to five (5) days during a calendar month.	The Reliability Coordinator failed to share the results of its system studies, when conditions warranted or was requested, with other Reliability Coordinators and with Transmission Operators, Balancing Authorities, and Transmission Service Providers within its Reliability Coordinator Area for more than five (5) days during a calendar month.
IRO-004-1	R6.	If the results of these studies indicate potential SOL or IROL violations, the Reliability Coordinator shall direct its Transmission Operators, Balancing Authorities and Transmission Service Providers to take any necessary action the Reliability Coordinator deems appropriate to address the potential SOL or IROL	~~The Reliability Coordinator failed to direct action to address a potential SOL or IROL violation on one (1) occasion during a calendar month.~~N/A	~~The Reliability Coordinator failed to direct action to address a potential SOL or IROL violation on two (2) to three (3) occasions during a calendar month.~~N/A	~~The reliability Coordinator failed to direct action to address a potential SOL or IROL violation on four (4) to five (5) occasions during a calendar month.~~N/A	The Reliability Coordinator failed to direct action to address a potential SOL or IROL violation ~~on more than five (5) occasions during~~when the results of its studies indicated a

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		violation.				~~calendar month.~~potential SOL or IROL violation.
IRO-004-1	R7.	Each Transmission Operator, Balancing Authority, and Transmission Service Provider shall comply with the directives of its Reliability Coordinator based on the next day assessments in the same manner in which it would comply during real time operating events.	~~The responsible entity failed to comply with the directives of its Reliability Coordinator based on the next day assessments in the same manner in which it would comply during real time operating events on one (1) occasion during a calendar month.~~N/A	~~The responsible entity failed to comply with the directives of its Reliability Coordinator based on the next day assessments in the same manner in which it would comply during real time operating events on two (2) to three (3) occasions during a calendar month.~~N/A	~~The responsible entity failed to comply with the directives of its Reliability Coordinator based on the next day assessments in the same manner in which it would comply during real time operating events on four (4) to five (5) occasions during a calendar month.~~N/A	The responsible entity failed to comply with the ~~directives of~~directive from its Reliability Coordinator based on the next day assessments in the same manner in which it would comply during real time operating events ~~on more than five (5) occasions during a calendar month~~.
IRO-005-2	R2.	Each Reliability Coordinator shall be aware of all Interchange Transactions that wheel through, source, or sink in its Reliability Coordinator Area, and make that Interchange Transaction information available to all Reliability Coordinators in the Interconnection.	N/A	N/A	The Reliability Coordinator was aware of all Interchange Transactions that wheeled through, sourced, or sinked in its Reliability Coordinator Area, but failed to make that Interchange	The Reliability Coordinator failed to be aware of all Interchange Transactions that wheeled through, sourced, or sinked in its Reliability Coordinator Area, and failed to make that Interchange

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					Transaction information available to all Reliability Coordinators in the Interconnection.	Transaction information available to all Reliability Coordinators in the Interconnection.
IRO-005-2	R3.	As portions of the transmission system approach or exceed SOLs or IROLs, the Reliability Coordinator shall work with its Transmission Operators and Balancing Authorities to evaluate and assess any additional Interchange Schedules that would violate those limits. If a potential or actual IROL violation cannot be avoided through proactive intervention, the Reliability Coordinator shall initiate control actions or emergency procedures to relieve the violation without delay, and no longer than 30 minutes. The Reliability Coordinator shall ensure all resources, including load shedding, are available to address a potential or actual IROL violation.	N/A	The Reliability Coordinator worked with its Transmission Operators and Balancing Authorities, as portions of the transmission system approached or exceeded SOLs or IROLs, to evaluate and assess any additional Interchange Schedules that would violate those limits and initiated control actions or emergency procedures to relieve the violation within 30 minutes, but failed to ensure all resources, including load	The Reliability Coordinator worked with its Transmission Operators and Balancing Authorities, as portions of the transmission system approached or exceeded SOLs or IROLs, to evaluate and assess any additional Interchange Schedules that would violate those limits and ensured all resources, including load shedding, were available to address a potential or actual IROL violation, but failed to initiate control actions or	The Reliability Coordinator failed to work with its Transmission Operators and Balancing Authorities, as portions of the transmission system approached or exceeded SOLs or IROLs, to evaluate and assess any additional Interchange Schedules that would violate those limits and failed to initiate control actions or emergency procedures to relieve the violation within 30 minutes.

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				shedding, were available to address a potential or actual IROL violation.	emergency procedures to relieve the violation within 30 minutes.	
IRO-005-2	R4.	Each Reliability Coordinator shall monitor its Balancing Authorities' parameters to ensure that the required amount of operating reserves is provided and available as required to meet the Control Performance Standard and Disturbance Control Standard requirements. If necessary, the Reliability Coordinator shall direct the Balancing Authorities in the Reliability Coordinator Area to arrange for assistance from neighboring Balancing Authorities. The Reliability Coordinator shall issue Energy Emergency Alerts as needed and at the request of its Balancing Authorities and Load-Serving Entities.	N/A	The Reliability Coordinator failed to direct the Balancing Authorities in the Reliability Coordinator Area to arrange for assistance from neighboring Balancing Authorities.	The Reliability Coordinator failed to issue Energy Emergency Alerts as needed and at the request of its Balancing Authorities and Load-Serving Entities.	The Reliability Coordinator failed to monitor its Balancing Authorities' parameters to ensure that the required amount of operating reserves was provided and available as required to meet the Control Performance Standard and Disturbance Control Standard requirements.
IRO-005-2	R5.	Each Reliability Coordinator shall identify the cause of any potential or actual SOL or IROL violations. The Reliability Coordinator shall initiate the control action or emergency procedure to relieve the potential or actual IROL violation without delay, and no longer than 30 minutes. The Reliability	N/A	N/A	The Reliability Coordinator identified the cause of a potential or actual SOL or IROL violation, but failed to initiate a control action or emergency	The Reliability Coordinator failed to identify the cause of a potential or actual SOL or IROL violation and failed to initiate a control action or

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Coordinator shall be able to utilize all resources, including load shedding, to address an IROL violation.			procedure to relieve the potential or actual IROL violation within 30 minutes.	emergency procedure to relieve the potential or actual IROL violation.
IRO-005-2	R6.	Each Reliability Coordinator shall ensure its Transmission Operators and Balancing Authorities are aware of Geo-Magnetic Disturbance (GMD) forecast information and assist as needed in the development of any required response plans.	N/A	N/A	The Reliability Coordinator ensured its Transmission Operators and Balancing Authorities were aware of Geo-Magnetic Disturbance (GMD) forecast information, but failed to assist, when needed, in the development of any required response plans.	The Reliability Coordinator failed to ensure its Transmission Operators and Balancing Authorities were aware of Geo-Magnetic Disturbance (GMD) forecast information.
IRO-005-2	R7.	The Reliability Coordinator shall disseminate information within its Reliability Coordinator Area, as required.	N/A	N/A	N/A	The Reliability Coordinator failed to disseminate information within its Reliability Coordinator Area, when required.
IRO-005-2	R10.	As necessary, the Reliability Coordinator shall assist the Balancing Authorities in its	N/A	N/A	N/A	The Reliability Coordinator failed to assist the

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		Reliability Coordinator Area in arranging for assistance from neighboring Reliability Coordinator Areas or Balancing Authorities.				Balancing Authorities in its Reliability Coordinator Area in arranging for assistance from neighboring Reliability Coordinator Areas or Balancing Authorities, when necessary.
IRO-005-2	R11.	The Reliability Coordinator shall identify sources of large Area Control Errors that may be contributing to Frequency Error, Time Error, or Inadvertent Interchange and shall discuss corrective actions with the appropriate Balancing Authority. The Reliability Coordinator shall direct its Balancing Authority to comply with CPS and DCS.	N/A	The Reliability Coordinator identified sources of large Area Control Errors that were contributing to Frequency Error, Time Error, or Inadvertent Interchange and discussed corrective actions with the appropriate Balancing Authority but failed to direct the Balancing Authority to comply with CPS and DCS.	The Reliability Coordinator identified sources of large Area Control Errors that were contributing to Frequency Error, Time Error, or Inadvertent Interchange but failed to discuss corrective actions with the appropriate Balancing Authority.	The Reliability Coordinator failed to identify sources of large Area Control Errors that were contributing to Frequency Error, Time Error, or Inadvertent Interchange.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
IRO-005-2	R12.	Whenever a Special Protection System that may have an inter-Balancing Authority, or inter-Transmission Operator impact (e.g., could potentially affect transmission flows resulting in a SOL or IROL violation) is armed, the Reliability Coordinators shall be aware of the impact of the operation of that Special Protection System on inter-area flows. The Transmission Operator shall immediately inform the Reliability Coordinator of the status of the Special Protection System including any degradation or potential failure to operate as expected.	N/A	N/A	N/A	The Reliability Coordinator failed to be aware of the impact on inter-area flows of an inter-Balancing Authority or inter-Transmission Operator, following the operation of a Special Protection System that ~~is~~was armed (e.g., could potentially affect transmission flows resulting in a SOL or IROL violation~~), or the~~). OR The Transmission Operator failed to immediately inform the Reliability Coordinator of the status of the Special Protection System including any degradation or potential failure to operate as

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						expected.
IRO-005-2	R13.	Each Reliability Coordinator shall ensure that all Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities operate to prevent the likelihood that a disturbance, action, or non-action in its Reliability Coordinator Area will result in a SOL or IROL violation in another area of the Interconnection. In instances where there is a difference in derived limits, the Reliability Coordinator and its Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall always operate the Bulk Electric System to the most limiting parameter.	N/A	N/A	N/A	The Reliability Coordinator failed to ~~shall~~ ensure that all Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities operated to prevent the likelihood that a disturbance, action, or non-action in its Reliability Coordinator Area could result in a SOL or IROL violation in another area of the Interconnection ~~or the~~. OR The responsible entity failed to

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						operate the Bulk Electric System to the most limiting parameter in instances where there was a difference in derived limits.~~.~~
IRO-005-2	R14.	Each Reliability Coordinator shall make known to Transmission Service Providers within its Reliability Coordinator Area, SOLs or IROLs within its wide-area view. The Transmission Service Providers shall respect these SOLs or IROLs in accordance with filed tariffs and regional Total Transfer Calculation and Available Transfer Calculation processes.	N/A	N/A	N/A	The Reliability Coordinator failed to make known to Transmission Service Providers within its Reliability Coordinator Area, SOLs or IROLs within its wide-area view~~, or the~~. OR The Transmission Service Providers failed to respect these SOLs or IROLs in accordance with filed tariffs and regional Total Transfer Calculation and Available Transfer Calculation

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						processes.
IRO-005-2	R15.	Each Reliability Coordinator who foresees a transmission problem (such as an SOL or IROL violation, loss of reactive reserves, etc.) within its Reliability Coordinator Area shall issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area without delay. The receiving Reliability Coordinator shall disseminate this information to its impacted Transmission Operators and Balancing Authorities. The Reliability Coordinator shall notify all impacted Transmission Operators, Balancing Authorities, when the transmission problem has been mitigated.	N/A	The Reliability Coordinator failed to notify all impacted Transmission Operators~~,~~ and Balancing Authorities, when the transmission problem had been mitigated.	N/A	The Reliability Coordinator who foresaw a transmission problem (such as an SOL or IROL violation, loss of reactive reserves, etc.) within its Reliability Coordinator Area failed to issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area~~,~~ ~~or the~~. OR The receiving Reliability Coordinator failed to disseminate this information to its impacted Transmission Operators and Balancing

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						Authorities.
IRO-005-2	R16.	Each Reliability Coordinator shall confirm reliability assessment results and determine the effects within its own and adjacent Reliability Coordinator Areas. The Reliability Coordinator shall discuss options to mitigate potential or actual SOL or IROL violations and take actions as necessary to always act in the best interests of the Interconnection at all times.	N/A	N/A	The Reliability Coordinator confirmed the reliability assessment results and ~~determine~~determined the effects within its own and adjacent Reliability Coordinator Areas and discussed options to mitigate potential or actual SOL or IROL violations, **but** failed to take actions as necessary to always act in the best interests of the Interconnection at all times.	The Reliability Coordinator failed to confirm reliability assessment results and determine the effects within its own and adjacent Reliability Coordinator Areas~~,~~ . OR The Reliability Coordinator failed to discuss options to mitigate potential or actual SOL or IROL violations and take actions as necessary to always act in the best interests of the Interconnection at all times.
IRO-005-2	R17.	When an IROL or SOL is exceeded, the Reliability Coordinator shall evaluate the local and wide-area impacts, both real-time and post-contingency, and	N/A	N/A	N/A	The Reliability Coordinator either failed to evaluate the local and wide-area impacts of an

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		determine if the actions being taken are appropriate and sufficient to return the system to within IROL in thirty minutes. If the actions being taken are not appropriate or sufficient, the Reliability Coordinator shall direct the Transmission Operator, Balancing Authority, Generator Operator, or Load-Serving Entity to return the system to within IROL or SOL.				IROL or SOL that was exceeded, in either real-time or post-contingency~~, or the~~. OR The Reliability Coordinator evaluated the local and wide-area impacts of an IROL or SOL that was exceeded, both real-time and post-contingency, and determined that the actions being taken were not appropriate and sufficient to return the system to within IROL in thirty (30) minutes, but failed to direct the Transmission Operator, Balancing Authority, Generator Operator, or Load-Serving Entity to return the system

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						to within IROL or SOL.
IRO-006-4.1	R2	The Reliability Coordinator shall only use local transmission loading relief or congestion management procedures to which the Transmission Operator experiencing the potential or actual SOL or IROL violation is a party.	N/A	N/A	N/A	A Reliability Coordinator implemented local transmission loading relief or congestion management procedures to relieve congestion but the Transmission Operator experiencing the congestion was not a party to those procedure
IRO-006-4.1	R3.	Each Reliability Coordinator with a relief obligation from an Interconnection-wide procedure shall follow the curtailments as directed by the Interconnection-wide procedure. A Reliability Coordinator desiring to use a local procedure as a substitute for curtailments as directed by the Interconnection-wide procedure shall obtain prior approval of the local procedure from the ERO.	N/A	N/A	N/A	A Reliability Coordinator implemented local transmission loading relief or congestion management procedures as a substitute for curtailment as directed by the Interconnection-wide procedure but the local

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						procedure had not received prior approval from the ERO
IRO-014-1	R1.	The Reliability Coordinator shall have Operating Procedures, Processes, or Plans in place for activities that require notification, exchange of information or coordination of actions with one or more other Reliability Coordinators to support Interconnection reliability. These Operating Procedures, Processes, or Plans shall address Scenarios that affect other Reliability Coordinator Areas as well as those developed in coordination with other Reliability Coordinators.	N/A	N/A	The Reliability Coordinator has Operating Procedures, Processes, or Plans in place for activities that require notification, exchange of information or coordination of actions with one or more other Reliability Coordinators to support Interconnection reliability, but failed to address Scenarios that affect other Reliability Coordinator Areas.	The Reliability Coordinator failed to have Operating Procedures, Processes, or Plans in place for activities that require notification, exchange of information or coordination of actions with one or more other Reliability Coordinators to support Interconnection reliability.
IRO-014-1	R1.1.	These Operating Procedures, Processes, or Plans shall collectively address, as a minimum, the following:	~~The Reliability Coordinator failed to include one of the elements listed in IRO-014-1 R1.1.1 through R1.1.6 in there Operating Procedures,~~	The Reliability Coordinator failed to include ~~two~~one of the elements listed in IRO-014-1	The Reliability Coordinator failed to include ~~more than~~ two of the elements listed in	~~N/A~~The Reliability Coordinator failed to include more than two of the

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			~~Processes, or Plans.~~N/A	R1.1.1 through R1.1.6 in ~~there~~its Operating Procedures, Processes, or Plans.	IRO-014-1 R1.1.1 through R1.1.6 in ~~there~~its Operating Procedures, Processes, or Plans.	elements listed in IRO-014-1 R1.1.1 through R1.1.6 in its Operating Procedures, Processes, or Plans.
IRO-014-1	R1.1.1.	Communications and notifications, including the conditions under which one Reliability Coordinator notifies other Reliability Coordinators; the process to follow in making those notifications; and the data and information to be exchanged with other Reliability Coordinators.	N/A	N/A	N/A	~~The Reliability Coordinator failed to address communications and notifications, including the conditions under which one Reliability Coordinator notifies other Reliability Coordinators; the process to follow in making those notifications; and the data and information to be exchanged with other Reliability Coordinators in its Operating Procedure, Process or Plan.~~N/A
IRO-014-	R1.1.2.	Energy and capacity shortages.	N/A	N/A	N/A	~~The Reliability~~

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1						~~Coordinator failed to address energy and capacity shortages in its Operating Procedure, Process or Plan.~~N/A
IRO-014-1	R1.1.3.	Planned or unplanned outage information.	N/A	N/A	N/A	~~The Reliability Coordinator failed to address planned or unplanned outage information in its Operating Procedure, Process or Plan.~~N/A
IRO-014-1	R1.1.4.	Voltage control, including the coordination of reactive resources for voltage control.	N/A	N/A	N/A	~~The Reliability Coordinator failed to address voltage control, including the coordination of reactive resources for voltage control in its Operating Procedure, Process or Plan.~~N/A
IRO-014-1	R1.1.5.	Coordination of information exchange to support reliability assessments.	N/A	N/A	N/A	~~The Reliability Coordinator failed to address the coordination of information exchange to support reliability~~

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						~~assessments in its Operating Procedure, Process or Plan.~~N/A
IRO-014-1	R1.1.6.	Authority to act to prevent and mitigate instances of causing Adverse Reliability Impacts to other Reliability Coordinator Areas.	N/A	N/A	N/A	~~The Reliability Coordinator failed to address authority to act to prevent and mitigate instances of causing Adverse Reliability Impacts to other Reliability Coordinator Areas in its Operating Procedure, Process or Plan.~~N/A
IRO-014-1	R4.	Each of the Operating Procedures, Processes, and Plans addressed in Reliability Standard IRO-014 Requirement 1 and Requirement 3 shall:	N/A	~~N/A~~The Operating Procedures, Processes and Plans did not include **one** of the elements listed in IRO-014-1 R4.1 through R4.3.	~~N/A~~The Operating Procedures, Processes and Plans did not include **two** of the elements listed in IRO-014-1 R4.1 through R4.3.	The ~~Reliability Coordinator developed an~~ Operating Procedure~~, Process, or Plan in accordance with IRO-014 Requirement 1~~s, Processes and ~~Requirement 3, but failed to comply with one~~Plans did not

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						include **any** of the elements listed in IRO-014-1 R4.1 through R4.3.
IRO-014-1	R4.1.	Include version control number or date	N/A	N/A	N/A	~~The Reliability Operator failed to include the version control number or date in its Operating Procedure, Process, or Plan.~~ N/A
IRO-014-1	R4.2.	Include a distribution list.	N/A	N/A	N/A	~~The Reliability Operator failed to include a distribution list in its Operating Procedure, Process, or Plan.~~ N/A
IRO-014-1	R4.3.	Be reviewed, at least once every three years, and updated if needed.	N/A	N/A	N/A	~~The Reliability Operator failed to review, at least once every three years, and update if needed, its Operating Procedure, Process, or Plan.~~ N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
IRO-015-1	R3.	The Reliability Coordinator shall provide reliability-related information as requested by other Reliability Coordinators.				The Reliability Coordinator failed to provide reliability-related information as requested by other Reliability Coordinators.

Violation Severity Level Matrix (MOD)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
MOD-006-0.1	R1.	Each Transmission Service Provider shall document its procedure on the use of Capacity Benefit Margin (CBM) (scheduling of energy against a CBM reservation). The procedure shall include the following three components:	The ~~Transmission Service Provider~~responsible entity documented its procedure on the use of Capacity Benefit Margin (CBM) but failed to include one (1) of the components as specified in R1.1, R1.2 or R1.3.	The ~~Transmission Service Provider~~responsible entity documented its procedure on the use of Capacity Benefit Margin (CBM) but failed to include two (2) of the components as specified in R1.1, R1.2 or R1.3.	The ~~Transmission Service Provider~~responsible entity documented its procedure on the use of Capacity Benefit Margin (CBM) but failed to include three (3) of the components as specified in R1.1, R1.2 and~~or~~ R1.3.	The ~~Transmission Service Provider~~responsible entity failed to document its procedure on the use of Capacity Benefit Margin (CBM).
MOD-006-0.1	R1.1.	Require that CBM be used only after the following steps have been taken (as time permits): all non-firm sales have been terminated, Direct-Control Load Management has been implemented, and customer interruptible demands have been interrupted. CBM may be used to reestablish Operating Reserves.	N/A	~~The Transmission Service Provider required that CBM be used only after all non-firm sales have been terminated and Direct-Control Load Management has been implemented but failed to include customer interruptible demands that have been interrupted.~~N/A	~~The Transmission Service Provider required that CBM be used only after all non-firm sales have been terminated but failed to include Direct-Control Load Management has been implemented and customer interruptible demands that have been interrupted.~~ N/A	~~The Transmission Service Provider failed to require that CBM be used only after all non-firm sales have been terminated, Direct-Control Load Management has been implemented and customer interruptible demands that have been interrupted.~~ N/A
MOD-006-0.1	R1.2.	Require that CBM shall only be used if the Load-Serving	N/A	~~The Transmission Service Provider required that CBM~~	N/A	~~The Transmission Service Provider failed to require that~~

Violation Severity Level Matrix (MOD)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Entity calling for its use is experiencing a generation deficiency and its Transmission Service Provider is also experiencing Transmission Constraints relative to imports of energy on its transmission system.		~~shall only be used if the Load-Serving Entity calling for its use is experiencing a generation deficiency but failed to require that CBM shall only be used if its Transmission Service Provider is also experiencing Transmission Constraints relative to imports of energy on its transmission system.~~N/A		~~CBM shall only be used if the Load-Serving Entity calling for its use is experiencing a generation deficiency and its Transmission Service Provider is also experiencing Transmission Constraints relative to imports of energy on its transmission system.~~N/A
MOD-006-0.1	R1.3.	Describe the conditions under which CBM may be available as Non-Firm Transmission Service.	N/A	N/A	N/A	~~The Transmission Service Provider has failed to describe the conditions under which CBM may be available as Non-Firm Transmission Service.~~N/A
MOD-007-0	R1.	Each Transmission Service Provider that uses CBM shall report (to the Regional Reliability Organization, NERC and the transmission users) the use of CBM by the Load-Serving Entities'	N/A	~~Each Transmission Service Provider that uses CBM reported (to the Regional Reliability Organization, NERC and the transmission users) the use of CBM by the Load-Serving Entities'~~	~~N/A~~The responsible entity uses CBM and failed to report the use of CBM to two (2) of the following: Regional Reliability Organization, NERC or transmission users.	~~Each Transmission Service Provider that~~The responsible entity uses CBM and failed to report ~~(~~the use of CBM to ~~the~~all of the following: Regional Reliability Organization, NERC and ~~the~~

Violation Severity Level Matrix (MOD)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Loads on its system, except for CBM sales as Non-Firm Transmission Service. (This use of CBM shall be consistent with the Transmission Service Provider's procedure for use of CBM.)		~~Loads on its system but failed to use CBM that is consistent with the Transmission Service Provider's procedure for use of CBM.~~The responsible entity uses CBM and failed to report the use of CBM to one (1) of the following: Regional Reliability Organization, NERC or transmission users.		transmission users~~) the use of CBM by the Load-Serving Entities' Loads on its system~~.
MOD-016-1.1	R1.	The Planning Authority and Regional Reliability Organization shall have documentation identifying the scope and details of the actual and forecast (a) Demand data, (b) Net Energy for Load data, and (c) controllable DSM data to be reported for system modeling and reliability analyses.	N/A	The ~~Planning Authority and Regional Reliability Organization has~~responsible entity did not have documentation identifying the scope and details of the actual and forecast data ~~but failed to have documentation identifying the scope data and details~~ for one (1) of the following ~~actual and forecast~~types of data to be reported for	The ~~Planning Authority and Regional Reliability Organization has~~responsible entity did not have documentation identifying the scope and details of the actual and forecast data ~~but failed to have documentation identifying the scope data and details~~ for two (2) of the following ~~actual and forecast data~~ to be reported for system	The ~~Planning Authority and Regional Reliability Organization has failed to~~responsible entity did not have documentation identifying the scope and details of the actual and forecast data to be reported for system modeling and reliability analyses.

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				system modeling and reliability analyses: ~~(a)~~ • Demand data~~,~~ ~~(b)~~ • Net Energy for Load data • ~~, or (c)~~ ~~controllable~~Controllable DSM data~~.~~	modeling and reliability analyses: ~~(a)~~ • Demand data~~,~~ ~~(b)~~ • Net Energy for Load data • ~~, or (c)~~ ~~controllable~~Controllable DSM data~~.~~	
MOD-016-1.1	R1.1.	The aggregated and dispersed data submittal requirements shall ensure that consistent data is supplied for Reliability Standards TPL-005, TPL-006, MOD-010, MOD-011, MOD-012, MOD-013, MOD-014, MOD-015, MOD-016, MOD-017, MOD-018, MOD-019, MOD-020, and MOD-021. The data submittal requirements shall stipulate that each Load-Serving Entity count its customer Demand once and	The ~~Planning Authority and Regional Reliability Organization~~responsible entity failed to ensure that consistent data is supplied for ~~less than or equal to 25% or~~one of the Reliability Standards as specified in R1.1 .	The ~~Planning Authority and Regional Reliability Organization~~responsible entity failed to ensure that consistent data is supplied for ~~greater than 25% but less than or equal to 50%~~two of the Reliability Standards as specified in R1.1.	The ~~Planning Authority and Regional Reliability Organization~~responsible entity failed to ensure that consistent data is supplied for ~~greater than 50% but less than or equal to 75%~~three of the Reliability Standards as specified in R1.1.	The ~~Planning Authority and Regional Reliability Organization~~responsible entity failed to ensure that consistent data is supplied for ~~greater than 75%~~four or more of the Reliability Standards as specified in R1.1. OR The ~~Planning Authority and Regional Reliability Organization~~responsible entity failed to

Violation Severity Level Matrix (MOD)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		only once, on an aggregated and dispersed basis, in developing its actual and forecast customer Demand values.				stipulate that each Load-Serving Entity count its customer Demand once and only once, on an aggregated and dispersed basis, in developing its actual and forecast customer Demand values.
MOD-016-1.1	R3.	The Planning Authority shall distribute its documentation required in R1 for reporting customer data and any changes to that documentation, to its Transmission Planners and Load-Serving Entities that work within its Planning Authority Area.	~~N/A~~The responsible entity failed to distribute its documentation required in Requirement R1 and any changes to that documentation to 5% or less of all Transmission Planners and Load-Serving Entities that work within its Region. OR The responsible entity distributed the documentation more than 30 calendar days but less than or equal to 40 calendar days following approval.	~~N/A~~The responsible entity failed to distribute its documentation required in Requirement R1 and any changes to that documentation to more than 5% up to (and including) 10% of all Transmission Planners and Load-Serving Entities that work within its Region. OR The responsible entity made the distribution more than 40 calendar days but less than or equal to 50 calendar days following	The ~~Planning Authority distributed its documentation as specified in R1 for reporting customer data but~~ responsible entity failed to distribute its documentation required in Requirement R1 and any changes to that documentation~~,~~ to ~~its~~more than 10% up to (and including) 15% of all Transmission Planners and Load-Serving Entities that work within its ~~Planning Authority Area.~~Region.	The ~~Planning Authority~~responsible entity failed to distribute its documentation as specified in Requirement R1 ~~for reporting customer data~~ to ~~its~~more than 15% of all Transmission Planners and Load-Serving Entities that work within its ~~Planning Authority Area.~~Region. OR The responsible entity failed to make the distribution more than 60 calendar days following

Violation Severity Level Matrix (MOD)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				approval.	OR The responsible entity made the distribution more than 50 calendar days but less than or equal to 60 calendar days following approval.	approval.
MOD-016-1.1	R3.1.	The Planning Authority shall make this distribution within 30 calendar days of approval.	~~The Planning Authority distributed the documentation more than 30 but less than or equal to 37 calendar days following approval.~~N/A	~~The Planning Authority made the distribution more than 37 but less than or equal to 51 calendar days following approval.~~ N/A	~~The Planning Authority made the distribution more than 51 but less than or equal to 58 calendar days following approval.~~N/A	~~The Planning Authority failed to make the distribution more than 58 calendar days following approval~~N/A
MOD-017-0.1	R1.	The Load-Serving Entity, Planning Authority, and Resource Planner shall each provide the following information annually on an aggregated Regional, subregional, Power Pool, individual system, or Load-Serving Entity basis to NERC, the Regional Reliability Organizations, and any other entities	The ~~Load-Serving Entity, Planning Authority, and Resource Planner~~responsible entity failed to provide one (1) of the elements of information as specified in R1.1, R1.2, R1.3 or R1.4 on an annual basis.	The ~~Load-Serving Entity, Planning Authority, and Resource Planner~~responsible entity failed to provide two (2) of the elements of information as specified in R1.1, R1.2, R1.3 or R1.4 on an annual basis.	The ~~Load-Serving Entity, Planning Authority, and Resource Planner~~responsible entity failed to provide three (3) of the elements of information as specified in R1.1, R1.2, R1.3 or R1.4 on an annual basis.	The ~~Load-Serving Entity, Planning Authority, and Resource Planner~~responsible entity failed to provide all of the elements of information as specified in R1.1, R1.2, R1.3 ~~or~~ and R1.4 on an annual basis.

Violation Severity Level Matrix (MOD)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		specified by the documentation in Standard MOD-016-1_R1.				
MOD-017-0.1	R1.1.	Integrated hourly demands in megawatts (MW) for the prior year.	N/A	N/A	N/A	~~The Load-Serving Entity, Planning Authority, and Resource Planner failed to provide Integrated hourly demands in megawatts (MW) for the prior year on an annual basis.~~N/A
MOD-017-0.1	R1.2.	Monthly and annual peak hour actual demands in MW and Net Energy for Load in gigawatthours (GWh) for the prior year.	N/A	N/A	N/A	~~The Load-Serving Entity, Planning Authority, and Resource Planner failed to provide monthly and annual peak hour actual demands in MW Net Energy for Load in gigawatthours (GWh) for the prior year.~~N/A
MOD-017-0.1	R1.3.	Monthly peak hour forecast demands in MW and Net Energy for Load in GWh for the next two years.	N/A	N/A	N/A	~~The Load-Serving Entity, Planning Authority, and Resource Planner failed to provide Monthly peak hour forecast demands in MW and Net Energy~~

Violation Severity Level Matrix (MOD)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						~~for Load in GWh for the next two years.~~N/A
MOD-017-0.1	R1.4.	Annual Peak hour forecast demands (summer and winter) in MW and annual Net Energy for load in GWh for at least five years and up to ten years into the future, as requested.	N/A	N/A	N/A	~~The Load-Serving Entity, Planning Authority, and Resource Planner failed to provide Annual Peak hour forecast demands (summer and winter) in MW and annual Net Energy for load in GWh for at least five years and up to ten years into the future, as requested.~~N/A
MOD-018-0	R1.	The Load-Serving Entity, Planning Authority, Transmission Planner and Resource Planner's report of actual and forecast demand data (reported on either an aggregated or dispersed basis) shall:	N/A	The ~~Load-Serving Entity, Planning Authority, Transmission Planner and Resource Planner~~ responsible entity's report failed to include~~report~~ one (1) of the items as specified in R1.1, R1.2, or R1.3.	The ~~Load-Serving Entity, Planning Authority, Transmission Planner and Resource Planner~~responsible entity's report failed to ~~report~~ include two (2) of the items as specified in R1.1, R1.2, or R1.3.	The ~~Load-Serving Entity, Planning Authority, Transmission Planner and Resource Planner~~responsible entity's report failed to ~~report all~~include any of the items as specified in R1.1, R1.2, and R1.3.
MOD-018-0	R1.1.	Indicate whether the demand data of nonmember entities	N/A	N/A	N/A	N/A~~The Load-Serving Entity, Planning Authority,~~

Violation Severity Level Matrix (MOD)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		within an area or Regional Reliability Organization are included, and				~~Transmission Planner and Resource Planner failed to indicate whether the demand data of nonmember entities within an area or Regional Reliability Organization are included.~~
MOD-018-0	R1.2.	Address assumptions, methods, and the manner in which uncertainties are treated in the forecasts of aggregated peak demands and Net Energy for Load.	N/A	N/A	N/A	~~The Load-Serving Entity, Planning Authority, Transmission Planner and Resource Planner failed to address assumptions, methods, and the manner in which uncertainties are treated in the forecasts of aggregated peak demands and Net Energy for Load.~~N/A
MOD-018-0	R1.3.	Items (MOD-018-0_R 1.1) and (MOD-018-0_R 1.2) shall be addressed as described in the reporting procedures	N/A	N/A	N/A	~~The Load-Serving Entity, Planning Authority, Transmission Planner and Resource Planner~~

Violation Severity Level Matrix (MOD)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		developed for Standard MOD-016-1_R1.				~~failed to address items (MOD-018-0_R 1.1) and (MOD-018-0_R 1.2) as described in the reporting procedures developed for Standard MOD-016-1_R1.~~N/A
MOD-021-0.1	R1.	The Load-Serving Entity, Transmission Planner, and Resource Planner's forecasts shall each clearly document how the Demand and energy effects of DSM programs (such as conservation, time-of-use rates, interruptible Demands, and Direct Control Load Management) are addressed.	~~Load-Serving Entity, Transmission Planner, and Resource Planner's~~The responsible entity's forecasts document how the Demand and energy effects of DSM programs but failed to document how one (1) of the following elements of the Demand and energy effects of DSM programs are addressed: conservation, time-of-use rates, interruptible Demands or Direct Control Load Management.	~~Load-Serving Entity, Transmission Planner, and Resource Planner's~~The responsible entity's forecasts document how the Demand and energy effects of DSM programs but failed to document how two (2) of the following elements of the Demand and energy effects of DSM programs are addressed: conservation, time-of-use rates, interruptible Demands or Direct Control Load Management.	~~Load-Serving Entity, Transmission Planner, and Resource Planner's~~The responsible entity's forecasts document how the Demand and energy effects of DSM programs but failed to document how three (3) of the following elements of the Demand and energy effects of DSM programs are addressed: conservation, time-of-use rates, interruptible Demands or Direct Control Load Management.	~~Load-Serving Entity, Transmission Planner, and Resource Planner's~~The responsible entity's forecasts failed to document how the Demand and energy effects of DSM programs are addressed.
MOD-021-0.1	R2.	The Load-Serving	N/A	N/A	N/A	The ~~Load-Serving~~

Violation Severity Level Matrix (MOD)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Entity, Transmission Planner, and Resource Planner shall each include information detailing how Demand-Side Management measures are addressed in the forecasts of its Peak Demand and annual Net Energy for Load in the data reporting procedures of Standard MOD-016-0_R1.				~~Entity, Transmission Planner, and Resource Planner~~responsible entity failed to include information detailing how Demand-Side Management measure(s) are addressed in the forecasts of its Peak Demand and annual Net Energy for Load in the data reporting procedures of Standard MOD-016-0_R 1.

Violation Severity Level Matrix (NUC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
NUC-001-2	R1.	The Nuclear Plant Generator Operator shall provide the proposed NPIRs in writing to the applicable Transmission Entities and shall verify receipt.	The Nuclear Plant Generator Operator ~~did not verify receipt of the proposed~~provided the NPIR's to the applicable entities but did not verify receipt.	The Nuclear Plant Generator Operator ~~submitted an incomplete~~did not provide the proposed NPIR to one of the applicable ~~transmission~~ entities.	The Nuclear Plant Generator Operator did not provide the proposed NPIR's to two of the ~~some~~ applicable entities.	The Nuclear Plant Generator Operator did not provide the proposed NPIR's to ~~any~~ more than two of applicable entities.
NUC-001-2	R2.	The Nuclear Plant Generator Operator and the applicable Transmission Entities shall have in effect one or more Agreements that include mutually agreed to NPIRs and document how the Nuclear Plant Generator Operator and the applicable Transmission Entities shall address and implement these NPIRs.	N/A	N/A	N/A	The Nuclear Plant Generator Operator or the applicable Transmission Entity does not have in effect one or more agreements that include mutually agreed to NPIRs and document the implementation of the NPIRs.
NUC-001-2	R3.	Per the Agreements developed in accordance with this standard, the applicable Transmission Entities shall	~~The applicable Transmission Entity incorporated the NPIRs into its planning analyses and identified no areas of concern but~~	The ~~applicable Transmission~~respons ible e~~E~~ntity incorporated the NPIRs into its planning analyses ~~and identified one or~~	~~The applicable Transmission Entity did not incorporate the NPIRs into its planning analyses of the electric system.~~N/A	The responsible entity did not incorporate the NPIRs into its planning analyses of the electric system. ~~N/A~~

Violation Severity Level Matrix (NUC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		incorporate the NPIRs into their planning analyses of the electric system and shall communicate the results of these analyses to the Nuclear Plant Generator Operator.	~~it did not communicate these results to the Nuclear Plant Generator Operator.~~N/A	~~more areas of concern~~ but did not communicate the~~se~~ results to the Nuclear Plant Generator Operator.		
NUC-001-2	R5.	The Nuclear Plant Generator Operator shall operate per the Agreements developed in accordance with this standard.	~~The Nuclear Operator failed to operate the plant in accordance with one or more of the administrative or training elements within the agreements.~~N/A	~~The Nuclear Operator failed to operate the plant in accordance with one or two of the technical, operations, and maintenance or communication elements within the agreements.~~N/A	~~The Nuclear Operator failed to operate the plant in accordance with three or more of the technical, operations, and maintenance or communication elements within the agreements.~~N/A	The Nuclear Plant Generator Operator failed to operate per the Agreements developed in accordance with this standard. ~~N/A~~
NUC-001-2	R9.	The Nuclear Plant Generator Operator and the applicable Transmission Entities shall include, as a minimum, the following elements within the agreement(s) identified in R2:	The agreement identified in R2. between the Nuclear Plant Generator Operator and the applicable Transmission Entities is missing one or more sub-components of R9.1.	The agreement identified in R2. between the Nuclear Plant Generator Operator and the applicable Transmission Entities is missing from one to five of the combined sub-components in R9.2, R9.3 and R9.4.	The agreement identified in R2. between the Nuclear Plant Generator Operator and the applicable Transmission Entities is missing from six to ten of the combined sub-components in R9.2, R9.3 and R9.4.	The agreement identified in R2. between the Nuclear Plant Generator Operator and the applicable Transmission Entities is missing eleven or more of the combined sub-components in R9.2, R9.3 and R9.4.
NUC-001-2	R9.1	Administrative	N/A~~-~~	N/A~~-~~	N/A~~-~~	N/A~~-~~

Violation Severity Level Matrix (NUC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		elements:				
NUC-001-2	R9.1.1	Definitions of key terms used in the agreement.	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.1.2	Names of the responsible entities, organizational relationships, and responsibilities related to the NPIRs.	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.1.3	A requirement to review the agreement(s) at least every three years.	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.1.4	A dispute resolution mechanism.	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.2	Technical requirements and analysis:	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.2.1	Identification of parameters, limits, configurations, and operating scenarios included in the NPIRs and, as applicable, procedures for providing any specific data not provided within the agreement.	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.2.2	Identification of	N/A-	N/A-	N/A-	N/A-

Violation Severity Level Matrix (NUC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		facilities, components, and configuration restrictions that are essential for meeting the NPIRs.				
NUC-001-2	R9.2.3	Types of planning and operational analyses performed specifically to support the NPIRs, including the frequency of studies and types of Contingencies and scenarios required.	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.3	Operations and maintenance coordination:	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.3.1	Designation of ownership of electrical facilities at the interface between the electric system and the nuclear plant and responsibilities for operational control coordination and maintenance of these facilities.	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.3.2	Identification of any maintenance	N/A-	N/A-	N/A-	N/A-

Violation Severity Level Matrix (NUC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		requirements for equipment not owned or controlled by the Nuclear Plant Generator Operator that are necessary to meet the NPIRs.				
NUC-001-2	R9.3.3	Coordination of testing, calibration and maintenance of on-site and off-site power supply systems and related components.	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.3.4	Provisions to address mitigating actions needed to avoid violating NPIRs and to address periods when responsible Transmission Entity loses the ability to assess the capability of the electric system to meet the NPIRs. These provisions shall include responsibility to notify the Nuclear Plant Generator Operator within a specified time frame.	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.3.5	Provision for	N/A-	N/A-	N/A-	N/A-

Violation Severity Level Matrix (NUC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		considering, within the restoration process, the requirements and urgency of a nuclear plant that has lost all off-site and on-site AC power.				
NUC-001-2	R9.3.6	Coordination of physical and cyber security protection of the Bulk Electric System at the nuclear plant interface to ensure each asset is covered under at least one entity's plan.	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.3.7	Coordination of the NPIRs with transmission system Special Protection Systems and underfrequency and undervoltage load shedding programs.	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.4	Communications and training:	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.4.1	Provisions for communications between the Nuclear Plant Generator	N/A-	N/A-	N/A-	N/A-

Violation Severity Level Matrix (NUC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Operator and Transmission Entities, including communications protocols, notification time requirements, and definitions of terms.				
NUC-001-2	R9.4.2	Provisions for coordination during an off-normal or emergency event affecting the NPIRs, including the need to provide timely information explaining the event, an estimate of when the system will be returned to a normal state, and the actual time the system is returned to normal.	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.4.3	Provisions for coordinating investigations of causes of unplanned events affecting the NPIRs and developing solutions to minimize future risk of such events.	N/A-	N/A-	N/A-	N/A-
NUC-001-2	R9.4.4	Provisions for supplying	N/A-	N/A-	N/A-	N/A-

Violation Severity Level Matrix (NUC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		information necessary to report to government agencies, as related to NPIRs.				
NUC-001-2	R9.4.5	Provisions for personnel training, as related to NPIRs.	N/A-	N/A-	N/A-	N/A-

Violation Severity Level Matrix (PER)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
PER-001-0.1	R1.	Each Transmission Operator and Balancing Authority shall provide operating personnel with the responsibility and authority to implement real-time actions to ensure the stable and reliable operation of the Bulk Electric System.	N/A	N/A	The Transmission Operator ~~and~~or Balancing Authority ~~has~~ failed to demonstrate ~~the communication~~that it communicated to ~~the~~its operating personnel their responsibility ~~OR~~or their authority to implement real-time actions to ensure ~~a~~ the stable and reliable operation of the Bulk Electric System.	The Transmission Operator ~~and~~ or Balancing Authority ~~has~~ failed to demonstrate ~~the communication~~that it communicated to ~~the~~its operating personnel their responsibility ~~AND~~ and authority to implement real-time actions to ensure ~~a~~ the stable and reliable operation of the Bulk Electric System.
PER-002-0	R1.	Each Transmission Operator and Balancing Authority shall be staffed with adequately trained operating personnel.	The ~~applicable~~responsible entity ~~did not adequately~~ failed to staff ~~and train operating personnel, affecting~~ 5% or less ~~of its~~with adequately trained operating personnel.	~~The applicable entity did not adequately staff and train operating personnel, affecting between 5-10% of its operating personnel.~~The responsible failed to staff more than 5% up to (and including) 10% with adequately trained operating personnel.	~~The applicable entity did not adequately staff and train operating personnel, affecting 10-15%, inclusive, of its operating personnel.~~The responsible entity failed to staff more than 10% up to (and including) 15% with adequately trained operating personnel.	The ~~applicable~~responsible entity ~~did not adequately~~ failed to staff ~~and train operating personnel, affecting greater~~more than 15% ~~of its~~with adequately trained operating personnel.
PER-002-0	R2.	Each Transmission Operator and	~~Each Transmission Operator and~~	~~Each Transmission Operator and~~	~~Each Transmission Operator and~~	~~Each Transmission Operator and~~

Violation Severity Level Matrix (PER)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Balancing Authority shall have a training program for all operating personnel that are in:	~~Balancing Authority has produced the training program for more than 75% but less than 100% of their real-time operating personnel.~~ The responsible entity did not train operating personnel for positions described in R2.1 or R2.2, affecting 5% or less of its operating personnel.	~~Balancing Authority has produced the training program for more than 50% but less than or equal to 75% of their real-time operating personnel.~~ The responsible entity did not train operating personnel for positions described in R2.1 or R2.2, affecting more than 5% up to (and including) 10% of its operating personnel.	~~Balancing Authority has produced the training program for more than 25% but less than or equal to 50% of their real-time operating personnel.~~ The responsible entity did not train operating personnel for positions described in R2.1 or R2.2, affecting more than 10% up to (and including) 15% of its operating personnel.	~~Balancing Authority has produced the training program for more than or equal to 0% but less than or equal to 25% of their real-time operating personnel.~~ The responsible entity did not train operating personnel for positions described in R2.1 or R2.2, affecting more than 15% of its operating personnel.
PER-002-0	R2.1.	Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.	N/A	N/A	N/A	~~The Transmission Operator and Balancing Authority failed to produce training program for their operating personnel.~~ N/A
PER-002-0	R2.2.	Positions directly responsible for complying with NERC standards.	N/A	N/A	N/A	~~The Transmission Operator and Balancing Authority failed to produce training program for positions directly responsible for~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						~~complying with NERC Standards.~~N/A
PER-002-0	R4.	For personnel identified in Requirement R2, each Transmission Operator and Balancing Authority shall provide its operating personnel at least five days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.	The ~~applicable~~responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting 5% or less of its operating personnel.	The ~~applicable~~responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting ~~between~~more than 5~~-~~% up to (and including) 10% of its operating personnel.	The ~~applicable~~responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting more than 10~~-~~% up to (and including) 15%~~,~~ ~~inclusive,~~ of its operating personnel.	The ~~applicable~~responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting ~~greater~~more than 15% of its operating personnel.
PER-003-0	R1.	Each Transmission Operator, Balancing Authority, and Reliability Coordinator shall staff all operating positions that meet both of the following criteria with personnel that are NERC-certified for the applicable functions:	~~The responsible entity failed to staff an operating position with NERC certified personnel for greater than 0 hours and less 12 hours for any operating position for a calendar month.~~ N/A	~~The responsible entity failed to staff an operating position with NERC certified personnel for greater than 12 hours and less 36 hours for any operating position for a calendar month.~~N/A	~~The responsible entity failed to staff an operating position with NERC certified personnel for greater than 36 hours and less 72 hours for any operating position for a calendar month.~~N/A	~~The responsible entity failed to staff an operating position with NERC certified personnel for greater than 72 hours for any operating position for a calendar month.~~The responsible entity did not staff all of its operating positions with personnel that are NERC-certified

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						as required by the criteria described in R1.1 and R1.2.
PER-003-0	R1.1.	Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.	~~The responsible entity failed to staff an operating position with NERC certified personnel for greater than 0 hours and less 12 hours for any operating position for a calendar month.~~ N/A	~~The responsible entity failed to staff an operating position with NERC certified personnel for greater than 12 hours and less 36 hours for any operating position for a calendar month.~~N/A	~~The responsible entity failed to staff an operating position with NERC certified personnel for greater than 36 hours and less 72 hours for any operating position for a calendar month.~~N/A	~~The responsible entity failed to staff an operating position with NERC certified personnel for greater than 72 hours for any operating position for a calendar month.~~N/A
PER-003-0	R1.2.	Positions directly responsible for complying with NERC standards.	~~The responsible entity failed to staff an operating position with NERC certified personnel for greater than 0 hours and less 12 hours for any operating position for a calendar month.~~ N/A	~~The responsible entity failed to staff an operating position with NERC certified personnel for greater than 12 hours and less 36 hours for any operating position for a calendar month.~~N/A	~~The responsible entity failed to staff an operating position with NERC certified personnel for greater than 36 hours and less 72 hours for any operating position for a calendar month.~~N/A	~~The responsible entity failed to staff an operating position with NERC certified personnel for greater than 72 hours for any operating position for a calendar month.~~N/A
PER-004-1	R1.	Each Reliability Coordinator shall be staffed with adequately trained and NERC-certified Reliability Coordinator operators, 24 hours per day, seven days per week.	N/A	N/A	N/A	The responsible entity has failed to be staffed with adequately trained and NERC-certified Reliability Coordinator operators, 24 hours per day, seven days per week.

Violation Severity Level Matrix (PER)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
PER-004-1	R2.	All Reliability Coordinator operating personnel shall each complete a minimum of five days per year of training and drills using realistic simulations of system emergencies, in addition to other training required to maintain qualified operating personnel.	~~The Reliability Coordinator's operating personnel completed at least 4 (but less than 5) days of emergency training.~~The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting 5% or less of its operating personnel.	~~The Reliability Coordinator's operating personnel completed at least 3 (but less than 4) days of emergency training.~~The responsible entity did not provide five days per year of training and drills, as directed by the requirement, more than 5% up to (and including) 10% of its operating personnel.	~~The Reliability Coordinator's operating personnel completed at least 2 (but less than 3) days of emergency training.~~The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting more than 10% up to (and including) 15% of its operating personnel.	~~The Reliability Coordinator's operating personnel completed less than 2 days of emergency training.~~The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting more than 15% of its operating personnel.
PER-004-1	R3.	Reliability Coordinator operating personnel shall have a comprehensive understanding of the Reliability Coordinator Area and interactions with neighboring Reliability Coordinator Areas.	5% or less of the Reliability Coordinator operating personnel did not have a comprehensive understanding of the Reliability Coordinator Area and interactions with ~~at least 75% and less than 100% of~~ neighboring Reliability Coordinator ~~areas.~~ Areas.	More than 5% up to (and including) 10% of the Reliability Coordinator operating personnel did not have a comprehensive understanding of the Reliability Coordinator Area and interactions with ~~50% or more and less than 75% of~~ neighboring Reliability Coordinator ~~areas.~~Areas.	More than 10% up to (and including) 15% of the Reliability Coordinator operating personnel did not have a comprehensive understanding of the Reliability Coordinator Area and interactions with ~~25% or more and less than 50% of~~ neighboring Reliability Coordinator ~~areas.~~Areas.	More than 15% of the Reliability Coordinator operating personnel did not have a comprehensive understanding of the Reliability Coordinator Area and interactions ~~less than 25% of~~with neighboring Reliability Coordinator ~~areas.~~Areas.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
PER-004-1	R4.	Reliability Coordinator operating personnel shall have an extensive understanding of the Balancing Authorities, Transmission Operators, and Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions.	5% or less of the Reliability Coordinator operating personnel did not have an extensive understanding of the ~~operations of more than 75% and less than 100% of all~~ Balancing Authorities, Transmission Operators, and ~~Generator~~Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions.	More than 5% up to (and including) 10% of the Reliability Coordinator operating personnel did not have an extensive understanding of the ~~operations of more than 50% and less than 75% of all~~ Balancing Authorities, Transmission Operators, and ~~Generator~~Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions.	More than 10% up to (and including) 15% of the Reliability Coordinator operating personnel did not have an extensive understanding of the ~~operations of more than 25% and less than 50% of all~~ Balancing Authorities, Transmission Operators, and ~~Generator~~Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions.	More than 15% of the Reliability Coordinator operating personnel did not have an extensive understanding of the ~~operations of less than 25% of all~~ Balancing Authorities, Transmission Operators, and ~~Generator~~Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
PRC-001-1	R1.	Each Transmission Operator, Balancing Authority, and Generator Operator shall be familiar with the purpose and limitations of protection system schemes applied in its area.	N/A	N/A	The responsible ~~entity was~~ failed to be familiar with the purpose of protection system schemes applied in its area. OR The responsible entity ~~but~~ failed to be familiar with the limitations of protection system schemes applied in its area.	The responsible entity failed to be familiar with the purpose and limitations of protection system schemes applied in its area.
PRC-001-1	R3.	A Generator Operator or Transmission Operator shall coordinate new protective systems and changes as follows.	N/A	N/A	N/A	N/A
PRC-001-1	R3.1.	Each Generator Operator shall coordinate all new protective systems and all protective system changes with its Transmission	The Generator Operator failed to coordinate one new protective system or one protective system change with either its	The Generator Operator failed to coordinate two new protective systems or two protective system changes with either its	The Generator Operator failed to coordinate three new protective systems or three protective system changes with either its	The Generator Operator failed to coordinate more than three new protective systems or more than three changes with its

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Operator and Host Balancing Authority.	Transmission Operator or its Host Balancing Authority or both.	Transmission Operator or its Host Balancing Authority, or both.	Transmission Operator or its Host Balancing Authority, or both.	Transmission Operator and Host Balancing Authority.
PRC-001-1	R3.2.	Each Transmission Operator shall coordinate all new protective systems and all protective system changes with neighboring Transmission Operators and Balancing Authorities.	The Transmission Operator failed to coordinate one new protective system or one protective system change with either its Transmission Operator or its Host Balancing Authority or both.	The Transmission Operator failed to coordinate two new protective systems or two protective system changes with either its Transmission Operator or its Host Balancing Authority, or both.	The Transmission Operator failed to coordinate three new protective systems or three protective system changes with either its Transmission Operator or its Host Balancing Authority, or both.	The Transmission Operator failed to coordinate more than three new protective systems or more than three system changes with neighboring Transmission Operators and Balancing Authorities.
PRC-001-1	R5.	A Generator Operator or Transmission Operator shall coordinate changes in generation, transmission, load or operating conditions that could require changes in the protection systems of others:	N/A	N/A	~~N/A~~The Generator Operator failed to notify its Transmission Operator at all of changes in generation or operating conditions that could require changes in the Transmission Operator's protection systems. (R5.1) OR The Transmission Operator failed to notify neighboring	The ~~responsible entity~~Generator Operator failed to ~~coordinate~~notify its Transmission Operator at all of changes in generation~~, transmission, load~~ or operating conditions that could require changes in the Transmission Operator's protection systems. (R5.1) AND The Transmission

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					Transmission Operators at all of changes in generation, transmission, load, or operating conditions that could require changes in the other Transmission Operators' protection systems. (R5.2)	Operator failed to notify neighboring Transmission Operators at all of ~~others:~~changes in generation, transmission, load, or operating conditions that could require changes in the other Transmission Operators' protection systems. (R5.2)
PRC-001-1	R5.1.	Each Generator Operator shall notify its Transmission Operator in advance of changes in generation or operating conditions that could require changes in the Transmission Operator's protection systems.	N/A	N/A	N/A	~~The Generator Operator failed to notify its Transmission Operator in advance of changes in generation or operating conditions that could require changes in the Transmission Operator's protection systems.~~N/A
PRC-001-1	R5.2.	Each Transmission Operator shall notify neighboring Transmission Operators in advance of changes in	N/A	N/A	N/A	~~The Transmission Operator failed to notify neighboring Transmission Operators in advance of changes in~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		generation, transmission, load, or operating conditions that could require changes in the other Transmission Operators' protection systems.				~~generation, transmission, load, or operating conditions that could require changes in the other Transmission Operators' protection systems.~~N/A
PRC-001-1	R6.	Each Transmission Operator and Balancing Authority shall monitor the status of each Special Protection System in their area, and shall notify affected Transmission Operators and Balancing Authorities of each change in status.	N/A	N/A	~~Notification~~The responsible entity monitored the status of each Special Protection System in its area but notification of a change in status of a Special Protection System was not made to the affected Transmission Operators and Balancing Authorities.	The responsible entity failed to monitor the status of each Special Protection System in its area, and did not notify affected Transmission Operators and Balancing Authorities of each change in status.
PRC-004-1	R1.	The Transmission Owner and any Distribution Provider that owns a transmission Protection System shall each analyze its transmission Protection System Misoperations and	~~Documentation of Misoperations is complete, but documentation of Corrective Action Plans is incomplete.~~N/A	The responsible entity provided evidence of analyzing a Misoperation but the documentation and implementation of the associated Corrective Action Plan was not	~~Documentation of Misoperations is incomplete, and there are no associated Corrective Action Plans.~~N/A	The responsible entity did not perform an analysis of a Misoperation. ~~Misoperations have not been analyzed~~

Violation Severity Level Matrix (PRC)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		shall develop and implement a Corrective Action Plan to avoid future Misoperations of a similar nature according to the Regional Reliability Organization's procedures developed for Reliability Standard PRC-003 Requirement 1.		provided. ~~Documentation of Misoperations is incomplete, and documentation of Corrective Action Plans is incomplete.~~		
PRC-004-1	R2.	The Generator Owner shall analyze its generator Protection System Misoperations, and shall develop and implement a Corrective Action Plan to avoid future Misoperations of a similar nature according to the Regional Reliability Organization's procedures developed for PRC-003 R1.	~~Documentation of Misoperations is complete, but documentation of Corrective Action Plans is incomplete.~~ N/A	~~Documentation of Misoperations is incomplete, and documentation of Corrective Action Plans is incomplete.~~The Generator Owner provided evidence of analyzing a Misoperation but the documentation and implementation of the associated Corrective Action Plan was not provided.	~~Documentation of Misoperations is incomplete, and there are no associated Corrective Action Plans.~~ N/A	~~Misoperations have not been analyzed~~The Generator Owner did not perform an analysis of a Misoperation.
PRC-004-1	R3.	The Transmission Owner, any Distribution Provider that owns a	The responsible entity provided its Regional Reliability Organization with	N/A	The responsible entity provided its Regional Reliability Organization with	The responsible entity did not provide its Regional Reliability

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		transmission Protection System, and the Generator Owner shall each provide to its Regional Reliability Organization, documentation of its Misoperations analyses and Corrective Action Plans according to the Regional Reliability Organization's procedures developed for PRC-003 R1.	documentation of its Misoperations analyses and its Corrective Action Plans, but did not provide these according to the Regional Reliability Organization's procedures.		documentation of its Misoperations analyses but did not provide its Corrective Action Plans.	Organization with documentation of its Misoperations analyses and did not provide its Corrective Action Plans.
PRC-005-1	R1.	Each Transmission Owner and any Distribution Provider that owns a transmission Protection System and each Generator Owner that owns a generation Protection System shall have a Protection System maintenance and testing program for Protection Systems that affect the reliability of the	~~N/A~~The responsible entity failed to have a basis for the maintenance and testing intervals in their program for one of the applicable Protection Systems (protective relays, associated communication systems, current sensing devices, batteries and DC control circuitry per NERC Glossary of Terms) that affect	~~N/A~~The responsible entity failed to have a basis for the maintenance and testing intervals in their program for two of the applicable Protection Systems (protective relays, associated communication systems, current sensing devices, batteries and DC control circuitry per NERC Glossary of Terms) that affect	The responsible entity ~~that owned a transmission Protection System or Generator Owner that owned a generation Protection System~~ failed to have ~~either a Protection System~~ a basis for the maintenance ~~program or a Protection System~~and testing intervals in their program for three of	The responsible entity ~~that owned a transmission Protection System or Generator Owner that owned a generation Protection System~~ failed to have ~~a~~ Protection System maintenance ~~program~~ and ~~a Protection System~~ testing program ~~for Protection Systems that affect the reliability of the~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		BES. The program shall include:	the reliability of the BES. OR Summary of maintenance and testing procedures were missing for one of the applicable Protection Systems. (R1.1, R1.2)	the reliability of the BES.	the applicable Protection Systems (protective relays, associated communication systems, current sensing devices, batteries and DC control circuitry per NERC Glossary of Terms) that affect the reliability of the BES.	~~BES~~.
PRC-005-1	R1.1.	Maintenance and testing intervals and their basis.	~~Maintenance and testing intervals and their basis was missing for no more than 25% of the applicable devices.~~N/A	~~Maintenance and testing intervals and their basis was missing for more than 25% but less than or equal to 50% of the applicable devices.~~N/A	~~Maintenance and testing intervals and their basis was missing for more than 50% but less than or equal to 75% of the applicable devices.~~N/A	~~Maintenance and testing intervals and their basis was missing for more than 75% but of the applicable devices.~~N/A
PRC-005-1	R1.2.	Summary of maintenance and testing procedures.	~~Summary of maintenance and testing procedures was missing for no more than 25% of the applicable devices.~~N/A	~~Summary of maintenance and testing procedures was missing for more than 25% but less than or equal to 50% of the applicable devices.~~N/A	~~Summary of maintenance and testing procedures was missing for more than 50% but less than or equal to 75% of the applicable devices.~~N/A	~~Summary of maintenance and testing procedures was missing for more than 75% but of the applicable devices.~~N/A
PRC-005-1	R2.	Each Transmission Owner and any Distribution Provider that owns a	The responsible entity provided documentation of its Protection System	~~The responsible entity provided documentation of its Protection System~~	~~The responsible entity provided documentation of its Protection System~~	~~The responsible entity did not provide documentation of its~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		transmission Protection System and each Generator Owner that owns a generation Protection System shall provide documentation of its Protection System maintenance and testing program and the implementation of that program to its Regional Reliability Organization on request (within 30 calendar days). The documentation of the program implementation shall include:	maintenance and testing program ~~for~~ more than 30 ~~but less than or equal to 40~~calendar days following a request from its Regional Reliability Organization and/or NERC. OR Evidence Protection System devices were maintained and tested within the defined intervals (R2.1 and R2.2) was missing 5% or less of the applicable devices.	~~maintenance and testing program for more than 40 but less than or equal to 50 days following a request from its Regional Reliability Organization and/or NERC.~~Evidence Protection System devices were maintained and tested within the defined intervals (R2.1 and R2.2) was missing more than 5% up to (and including) 10% of the applicable devices.	~~maintenance and testing program for more than 50 but less than or equal to 60 days following a request from its Regional Reliability Organization and/or NERC.~~Evidence Protection System devices were maintained and tested within the defined intervals (R2.1 and R2.2) was missing more than 10% up to (and including) 15% of the applicable devices.	~~Protection System maintenance and testing program for more than 60 days following a request from its Regional Reliability Organization and/or NERC.~~Evidence Protection System devices were maintained and tested within the defined intervals (R2.1 and R2.2) was missing more than 15% of the applicable devices.
PRC-005-1	R2.1.	Evidence Protection System devices were maintained and tested within the defined intervals.	~~Evidence Protection System devices were maintained and tested within the defined intervals was missing for no more than 25% of the applicable devices.~~N/A	~~Evidence Protection System devices were maintained and tested within the defined intervals was missing more than 25% but less than or equal to 50% of the applicable devices.~~N/A	~~Evidence Protection System devices were maintained and tested within the defined intervals was missing more than 50% but less than or equal to 75% of the applicable devices.~~N/A	~~Evidence Protection System devices were maintained and tested within the defined intervals was missing more than 75% of the applicable devices.~~N/A
PRC-005-1	R2.2.	Date each Protection System device was last	~~Date each Protection System device was last tested/maintained~~	~~Date each Protection System device was last tested/maintained~~	~~Date each Protection System device was last tested/maintained~~	~~Date each Protection System device was last tested/maintained~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		tested/maintained.	~~was missing no more than 25% of the applicable devices.~~N/A	~~was missing for more than 25% but less than or equal to 50% of the applicable devices.~~N/A	~~was missing for more than 50% but less than or equal to 75% of the applicable devices.~~N/A	~~was missing for more than 75% of the applicable devices.~~N/A
PRC-007-0	R1.	The Transmission Owner and Distribution Provider with a UFLS program (as required by its Regional Reliability Organization) shall ensure that its UFLS program is consistent with its Regional Reliability Organization's UFLS program requirements.	The evaluation of the entity's UFLS program for consistency with its Regional Reliability Organization's UFLS program is incomplete or inconsistent in one or more of the Regional Reliability Organization program requirements, but is consistent with the required amount of load shedding.	The amount of load shedding is less than 95 percent of the Regional requirement in any of the load steps.	The amount of load shedding is less than 90 percent of the Regional requirement in any of the load steps.	The amount of load shedding is less than 85 percent of the Regional requirement in any of the load steps.
PRC-007-0	R2.	The Transmission Owner, Transmission Operator, Distribution Provider, and Load-Serving Entity that owns or operates a UFLS program (as required by its Regional Reliability Organization) shall	~~The responsible entity has demonstrated the reporting of information but failed to satisfy one database reporting requirements.~~The responsible entity that owns or operates a UFLS program (as required	~~The responsible entity has demonstrated the reporting of information but failed to satisfy two database reporting requirements.~~The responsible entity that owns or operates a UFLS program (as required	~~The responsible entity has demonstrated the reporting of information but failed to satisfy at three database reporting requirements.~~The responsible entity that owns or operates a UFLS	~~The responsible entity has demonstrated the reporting of information but failed to satisfy four or more database reporting requirements or has not provided the information.~~The responsible entity

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		provide, and annually update, its underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database.	by its Regional Reliability Organization) provided its underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database but its annual update was late by 30 calendar days or less.	by its Regional Reliability Organization) provided its underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database but its annual update was late by more than 30 calendar days but less than or equal to 40 calendar days	program (as required by its Regional Reliability Organization) provided its underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database but its annual update was late by more than 40 calendar days but less than or equal to 50 calendar days.	that owns or operates a UFLS program (as required by its Regional Reliability Organization) did not provided its underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database, OR The responsible entity's annual update was late by more than 50 calendar days.
PRC-007-0	R3.	The Transmission Owner and Distribution Provider that owns a UFLS program (as required by its Regional Reliability Organization) shall provide its documentation of that UFLS program to its Regional Reliability Organization on request (30 calendar	The responsible entity has provided the documentation in more than 30 calendar days but less than or equal to 40 calendar days.	The responsible entity has provided the documentation in more than ~~39~~40 calendar days but less than or equal to 50 calendar days.	The responsible entity has provided the documentation in more than ~~49~~50 calendar days but less than or equal to 60 calendar days.	The responsible entity has not provided the documentation ~~within~~for more than 60 calendar days.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		days).				
PRC-008-0	R1.	The Transmission Owner and Distribution Provider with a UFLS program (as required by its Regional Reliability Organization) shall have a UFLS equipment maintenance and testing program in place. This UFLS equipment maintenance and testing program shall include UFLS equipment identification, the schedule for UFLS equipment testing, and the schedule for UFLS equipment maintenance.	The UFLS equipment identification, testing schedule or maintenance schedule for ~~UFLS equipment testing or the schedule for UFLS equipment testing in~~ the responsible ~~entity's~~entity's UFLS equipment maintenance and testing program was missing ~~for no more than 25%~~5% or less of the applicable ~~relays.~~equipment.	The UFLS equipment identification, testing schedule, or maintenance schedule for ~~UFLS equipment testing or the schedule for UFLS equipment testing in~~ the responsible ~~entity's~~entity's UFLS equipment maintenance and testing program was missing for more than ~~25% but less than or equal~~5% up to ~~50~~(and including) 10% of the applicable ~~relays.~~equipment.	The UFLS equipment identification, testing schedule, or maintenance schedule for ~~UFLS equipment testing or the schedule for UFLS equipment testing in~~ the responsible ~~entity's~~entity's UFLS equipment maintenance and testing program was missing ~~for~~ more than ~~50% but less than or equal~~10% up to ~~75%~~(and including) 15% of the applicable ~~relays.~~equipment.	The responsible entity failed to implement UFLS equipment maintenance and testing program. OR The UFLS equipment identification, testing schedule, or maintenance schedule for ~~UFLS equipment testing or~~ the ~~schedule for UFLS equipment testing in the~~ responsible ~~entity's~~entity's UFLS equipment maintenance and testing program was missing ~~for~~ more than ~~75~~15% of the applicable ~~relays.~~equipment.
PRC-008-0	R2.	The Transmission Owner and Distribution Provider with a UFLS program (as required by its Regional Reliability	The responsible entity provided documentation of its UFLS equipment maintenance and testing program ~~for~~ more than 30 ~~but~~	~~The responsible entity provided documentation of its UFLS equipment maintenance and testing program for more than 40 but~~	~~The responsible entity provided documentation of its UFLS equipment maintenance and testing program for more than 50 but~~	~~The responsible entity did not provide documentation of its UFLS equipment maintenance and testing program for~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Organization) shall implement its UFLS equipment maintenance and testing program and shall provide UFLS maintenance and testing program results to its Regional Reliability Organization and NERC on request (within 30 calendar days).	~~less than or equal to 40~~calendar days following a request from its Regional Reliability Organization and/or NERC. OR Evidence UFLS equipment was maintained and tested within the defined intervals was missing for 5% or less of the applicable devices.	~~less than or equal to 50 days following a request from its Regional Reliability Organization and/or NERC.~~Evidence UFLS equipment was maintained and tested within the defined intervals was missing for more than 5% up to (and including) 10% of the applicable devices.	~~less than or equal to 60 days following a request from its Regional Reliability Organization and/or NERC.~~Evidence UFLS equipment was maintained and tested within the defined intervals was missing for more than 10% up to (and including) 15% of the applicable devices.	~~more than 60 days following a request from its Regional Reliability Organization and/or NERC.~~Evidence UFLS equipment was maintained and tested within the defined intervals was missing for more than 15% of the applicable devices.
PRC-009-0	R1.	The Transmission Owner, Transmission Operator, Load-Serving Entity, and Distribution Provider that owns or operates a UFLS program (as required by its Regional Reliability Organization) shall analyze and document its UFLS program performance in accordance with its Regional Reliability Organization's	The responsible entity that owns or operates a UFLS program failed to include one of the elements listed in PRC-009-0 R1.1 through R1.4 in the analysis of the performance of UFLS equipment and Program effectiveness, as described in PRC-009-0 R1, following system events resulting in system frequency excursions below the	The responsible entity that owns or operates a UFLS program failed to include two of the elements listed in PRC-009-0 R1.1 through R1.4 in the analysis of the performance of UFLS equipment and Program effectiveness, as described in PRC-009-0 R1, following system events resulting in system frequency excursions below the	The responsible entity that owns or operates a UFLS program failed to include three of the elements listed in PRC-009-0 R1.1 through R1.4 in the analysis of the performance of UFLS equipment and Program effectiveness, as described in PRC-009-0 R1, following system events resulting in system frequency excursions below the	The responsible entity that owns or operates a UFLS program failed to conduct an analysis of the performance of UFLS equipment and Program effectiveness, as described in PRC-009-0 R1, following system events resulting in system frequency excursions below the initializing set points of the UFLS program.

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		UFLS program. The analysis shall address the performance of UFLS equipment and program effectiveness following system events resulting in system frequency excursions below the initializing set points of the UFLS program. The analysis shall include, but not be limited to:	initializing set points of the UFLS program.	initializing set points of the UFLS program.	initializing set points of the UFLS program.	
PRC-009-0	R1.1.	A description of the event including initiating conditions.	N/A	N/A	N/A	~~The responsible entity failed to include a description of the event, including initiating conditions, that triggered an analysis of the performance of UFLS equipment and Program effectiveness, as described in PRC-009-0 R1, following system events resulting in system frequency excursions below the initializing set points~~

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						~~of the UFLS program.~~N/A
PRC-009-0	R1.2.	A review of the UFLS set points and tripping times.	N/A	N/A	N/A	~~The responsible entity failed to include a review of the UFLS set points and tripping times in the analysis of the performance of UFLS equipment and Program effectiveness, as described in PRC-009-0 R1, following system events resulting in system frequency excursions below the initializing set points of the UFLS program.~~N/A
PRC-009-0	R1.3.	A simulation of the event.	N/A	N/A	N/A	~~The responsible entity failed to conduct a simulation of the event that triggered an analysis of the performance of UFLS equipment and Program effectiveness, as described in PRC-009-0 R1, following system events resulting in system frequency~~

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						~~excursions below the initializing set points of the UFLS program.~~N/A
PRC-009-0	R1.4.	A summary of the findings.	N/A	N/A	N/A	~~The responsible entity failed to include a summary of the findings in the analysis of the performance of UFLS equipment and Program effectiveness, as described in PRC-009-0 R1, following system events resulting in system frequency excursions below the initializing set points of the UFLS program.~~N/A
PRC-010-0	R1.	The Load-Serving Entity, Transmission Owner, Transmission Operator, and Distribution Provider that owns or operates a UVLS program shall periodically (at least every five years or as required by changes in system	The responsible entity conducted an assessment of the effectiveness of its UVLS system within 5 years or as required by changes in system conditions but did not include the associated Transmission Planner(s) and Planning Authority	The responsible entity did not conduct an assessment of the effectiveness of its UVLS system for more than 5 years but did in less than or equal to 7 years. OR The assessment of the effectiveness of	The responsible entity did not conduct an assessment of the effectiveness of its UVLS system for more than 7 years but did in less than or equal to 10 years. OR The assessment of the effectiveness of	The responsible entity did not conduct an assessment of the effectiveness of its UVLS system for more than 10 years. OR The assessment of the effectiveness of the responsible entity's UVLS

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		conditions) conduct and document an assessment of the effectiveness of the UVLS program. This assessment shall be conducted with the associated Transmission Planner(s) and Planning Authority(ies).	(ies).	the responsible entity's UVLS system did not address one of the elements in R1 (R1.1.1 through R1.1.3.).	the responsible entity's UVLS system did not address two of the elements in R1 (R1.1.1 through R1.1.3.).	system did not address any of the elements in R1 (R1.1.1 through R1.1.3.).
PRC-010-0	R1.1.	This assessment shall include, but is not limited to:	N/A	~~The assessment of the effectiveness of the responsible entity's UVLS system did not address one of the elements in R1.1.1 through R1.1.3.~~N/A	~~The assessment of the effectiveness of the responsible entity's UVLS system did not address two of the elements in R1.1.1 through R1.1.3.~~N/A	~~The assessment of the effectiveness of the responsible entity's UVLS system did not address any of the elements in R1.1.1 through R1.1.3.~~N/A
PRC-010-0	R1.1.1.	Coordination of the UVLS programs with other protection and control systems in the Region and with other Regional Reliability Organizations, as appropriate.	~~The responsible entity is non-compliant in the coordination of the UVLS programs with no more than 25% of the appropriate protection and control systems in the Region and with other Regional Reliability Organizations.~~N/A	~~The responsible entity is non-compliant in the coordination of the UVLS programs with more than 25% but less than or equal to 50% of the appropriate protection and control systems in the Region and with other Regional Reliability~~	~~The responsible entity is non-compliant in the coordination of the UVLS programs with more than 50% but less than or equal to 75% of the appropriate protection and control systems in the Region and with other Regional Reliability~~	~~The responsible entity is non-compliant in the coordination of the UVLS programs with more than 75% of the appropriate protection and control systems in the Region and with other Regional Reliability Organizations.~~N/A

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				~~Organizations.~~N/A	~~Organizations.~~N/A	
PRC-010-0	R1.1.2.	Simulations that demonstrate that the UVLS programs performance is consistent with Reliability Standards TPL-001-0, TPL-002-0, TPL-003-0 and TPL-004-0.	~~The responsible entity's analysis was non-compliant in that no more than 25% of the simulations needed to demonstrate consistency with Reliability Standards TPL-001-0, TPL-002-0, TPL-003-0 and TPL-004-0 were not performed.~~N/A	~~The responsible entity's analysis was non-compliant in that more than 25% but less than or equal to 50% of the simulations needed to demonstrate consistency with Reliability Standards TPL-001-0, TPL-002-0, TPL-003-0 and TPL-004-0 were not performed.~~N/A	~~The responsible entity's analysis was non-compliant in that more than 50% but less than or equal to 75% of the simulations needed to demonstrate consistency with Reliability Standards TPL-001-0, TPL-002-0, TPL-003-0 and TPL-004-0 were not performed.~~N/A	~~The responsible entity's analysis was non-compliant in that more than 75% of the simulations needed to demonstrate consistency with Reliability Standards TPL-001-0, TPL-002-0, TPL-003-0 and TPL-004-0 were not performed.~~N/A
PRC-010-0	R1.1.3.	A review of the voltage set points and timing.	~~The responsible entity's analysis is non-compliant in that a review of no more than 25% of the corresponding voltage set points and timing was not performed.~~N/A	~~The responsible entity's analysis is non-compliant in that a review of more than 25% but less than or equal to 50% of the corresponding voltage set points and timing was not performed.~~N/A	~~The responsible entity's analysis is non-compliant in that a review of more than 50% but less than 75% of the corresponding voltage set points and timing was not performed.~~N/A	~~The responsible entity's analysis is non-compliant in that a review of more than 75% of the corresponding voltage set points and timing was not performed.~~N/A
PRC-010-0	R2.	The Load-Serving Entity, Transmission Owner, Transmission Operator, and Distribution Provider that owns or operates a UVLS	The responsible entity provided documentation of its current UVLS program assessment more than 30 calendar but less than or equal to 40	The responsible entity provided documentation of its current UVLS program assessment more than 40 calendar days but less than or equal to	The responsible entity provided documentation of its current UVLS program assessment more than 50 calendar days but less than or equal to	The responsible entity did not provide documentation of its current UVLS program assessment for more than 60 calendar days

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		program shall provide documentation of its current UVLS program assessment to its Regional Reliability Organization and NERC on request (30 calendar days).	calendar days following a request from its Regional Reliability Organization ~~and/~~or NERC.	50 calendar days following a request from its Regional Reliability Organization ~~and/~~or NERC.	60 calendar days following a request from its Regional Reliability Organization ~~and/~~or NERC.	following a request from its Regional Reliability Organization ~~and/~~or NERC.
PRC-011-0	R1.	The Transmission Owner and Distribution Provider that owns a UVLS system shall have a UVLS equipment maintenance and testing program in place. This program shall include:	The responsible entity's UVLS equipment maintenance and testing program did not address one of the ~~elements~~subrequirements in R1.~~1~~2 through R1.6. OR The responsible entity's UVLS program did not address one of the equipment classes as specified in R1.1.1 through R1.1.4.	The responsible entity's UVLS equipment maintenance and testing program did not address two ~~or three~~ of the ~~elements~~subrequirements in R1.~~1~~2 through R1.6. OR The responsible entity's UVLS program did not address two of the equipment classes as specified in R1.1.1 through R1.1.4.	The responsible entity's UVLS equipment maintenance and testing program did not address ~~four or five~~three of the ~~elements~~subrequirements in R1.1 through R1.6. OR The responsible entity's UVLS program did not address three of the equipment classes as specified in R1.1.1 through R1.1.4.	The responsible entity's UVLS equipment maintenance and testing program did not address ~~any~~four or more of the ~~elements~~subrequirements in R1.~~1~~2 through R1.6. OR The responsible entity's UVLS program did not address any of the equipment classes as specified in R1.1.1 through R1.1.4.
PRC-011-0	R1.1.	The UVLS system identification which shall include but is not limited to:	~~The responsible entity's UVLS program system identification did not address one of the elements in R1.1.1~~	~~The responsible entity's UVLS program system identification did not address two of the elements in R1.1.1~~	~~The responsible entity's UVLS program system identification did not address three of the elements in R1.1.1~~	~~The responsible entity's UVLS program system identification did not address any of the elements in R1.1.1~~

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			~~through R1.1.4.~~N/A	~~through R1.1.4.~~N/A	~~through R1.1.4.~~N/A	~~through R1.1.4.~~N/A
PRC-011-0	R1.1.1.	Relays.	~~The responsible entity's UVLS program system identification was missing no more than 25% of the applicable relays.~~N/A	~~The responsible entity's UVLS program system identification was missing more than 25% but less than or equal to 50% of the applicable relays.~~N/A	~~The responsible entity's UVLS program system identification was missing more than 50% but less than or equal to 75% of the applicable relays.~~N/A	~~The responsible entity's UVLS program system identification was missing more than 75% of the applicable relays.~~N/A
PRC-011-0	R1.1.2.	Instrument transformers.	~~The responsible entity's UVLS program system identification was missing no more than 25% of the applicable instrument transformers.~~N/A	~~The responsible entity's UVLS program system identification was missing more than 25% but less than or equal to 50% of the applicable instrument transformers.~~N/A	~~The responsible entity's UVLS program system identification was missing more than 50% but less than or equal to 75% of the applicable instrument transformers.~~N/A	~~The responsible entity's UVLS program system identification was missing more than 75% of the applicable instrument transformers.~~N/A
PRC-011-0	R1.1.3.	Communications systems, where appropriate.	~~The responsible entity's UVLS program system identification was missing no more than 25% of the appropriate communication systems.~~N/A	~~The responsible entity's UVLS program system identification was missing more than 25% but less than or equal to 50% of the appropriate communication systems.~~N/A	~~The responsible entity's UVLS program system identification was missing more than 50% but less than or equal to 75% of the appropriate communication systems.~~N/A	~~The responsible entity's UVLS program system identification was missing more than 75% of the appropriate communication systems.~~N/A
PRC-011-0	R1.1.4.	Batteries.	~~The responsible entity's UVLS program system identification was~~	~~The responsible entity's UVLS program system identification was~~	~~The responsible entity's UVLS program system identification was~~	~~The responsible entity's UVLS program system identification was~~

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			~~missing no more than 25% of the applicable batteries.~~N/A	~~missing more than 25% but less than or equal to 50% of the applicable batteries.~~N/A	~~missing more than 50% but less than or equal to 75% of the applicable batteries.~~N/A	~~missing more than 75% of the applicable batteries.~~N/A
PRC-011-0	R1.2.	Documentation of maintenance and testing intervals and their basis.	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that documentation of maintenance and testing intervals and their basis was missing for no more than 25% of the UVLS equipment.~~N/A	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that documentation of maintenance and testing intervals and their basis was missing for more than 25% but less than or equal to 50% of the UVLS equipment.~~N/A	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that documentation of maintenance and testing intervals and their basis was missing for more than 50% but less than or equal to 75% of the UVLS equipment.~~N/A	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that documentation of maintenance and testing intervals and their basis was missing for more than 75% of the UVLS equipment.~~N/A
PRC-011-0	R1.3.	Summary of testing procedure.	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that a summary of the testing procedure was missing for no more than 25% of the UVLS equipment.~~N/A	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that a summary of the testing procedure was missing for more than 25% but less than or equal to 50% of the UVLS equipment.~~N/A	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that a summary of the testing procedure was missing for more than 50% but less than or equal to 75% of the UVLS equipment.~~N/A	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that a summary of the testing procedure was missing for more than 75% of the UVLS equipment.~~N/A
PRC-011-0	R1.4.	Schedule for system	~~The responsible~~	~~The responsible~~	~~The responsible~~	~~The responsible~~

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		testing.	~~entity's UVLS equipment maintenance and testing program was non-compliant in that a schedule for system testing was missing for no more than 25% of the UVLS equipment.~~N/A	~~entity's UVLS equipment maintenance and testing program was non-compliant in that a schedule for system testing was missing for more than 25% but less than or equal to 50% of the UVLS equipment.~~N/A	~~entity's UVLS equipment maintenance and testing program was non-compliant in that a schedule for system testing was missing for more than 50% but less than or equal to 75% of the UVLS equipment.~~N/A	~~entity's UVLS equipment maintenance and testing program was non-compliant in that a schedule for system testing was missing for more than 75% of the UVLS equipment.~~N/A
PRC-011-0	R1.5.	Schedule for system maintenance.	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that a schedule for system maintenance was missing for no more than 25% of the UVLS equipment.~~N/A	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that a schedule for system maintenance was missing for more than 25% but less than or equal to 50% of the UVLS equipment.~~N/A	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that a schedule for system maintenance was missing for more than 50% but less than or equal to 75% of the UVLS equipment.~~N/A	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that a schedule for system maintenance was missing for more than 75% of the UVLS equipment.~~N/A
PRC-011-0	R1.6.	Date last tested/maintained.	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that the date last tested/maintained was missing for no more than 25% of~~	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that the date last tested/maintained was missing for more than 25% but~~	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that the date last tested/maintained was missing for more than 50% but~~	~~The responsible entity's UVLS equipment maintenance and testing program was non-compliant in that the date last tested/maintained was missing for more than 75% of~~

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			~~the UVLS equipment.~~N/A	~~less than or equal to 50% of the UVLS equipment.~~N/A	~~less than or equal to 75% of the UVLS equipment.~~N/A	~~the UVLS equipment.~~N/A
PRC-011-0	R2.	The Transmission Owner and Distribution Provider that owns a UVLS system shall provide documentation of its UVLS equipment maintenance and testing program and the implementation of that UVLS equipment maintenance and testing program to its Regional Reliability Organization and NERC on request (within 30 calendar days).	The responsible entity provided documentation of its UVLS equipment maintenance and testing program more than 30 but less than or equal to 40 days following a request from its Regional Reliability Organization and/or NERC. OR Evidence UVLS equipment was maintained and tested within the defined intervals was missing for 5% or less of the applicable devices.	The responsible entity provided documentation of its UVLS equipment maintenance and testing program more than 40 but less than or equal to 50 days following a request from its Regional Reliability Organization and/or NERC. OR Evidence UVLS equipment was maintained and tested within the defined intervals was missing for more than 5% up to (and including) 10% of the applicable devices.	The responsible entity provided documentation of its UVLS equipment maintenance and testing program more than 50 but less than or equal to 60 days following a request from its Regional Reliability Organization and/or NERC. OR Evidence UVLS equipment was maintained and tested within the defined intervals was missing for more than 10% up to (and including) 15% of the applicable devices.	The responsible entity did not provide documentation of its UVLS equipment maintenance and testing program for more than 60 days following a request from its Regional Reliability Organization and/or NERC. OR Evidence UVLS equipment was maintained and tested within the defined intervals was missing for more than 15% of the applicable devices.
PRC-015-0	R1.	The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall maintain a list of and	N/A	The responsible entity's list of existing or proposed SPSs did not address one of the ~~elements~~subrequirements in R1.1	The responsible entity's list of existing or proposed SPSs did not address two of the ~~elements~~subrequirements in R1.1	The responsible entity's list of existing or proposed SPSs did not address any of the ~~elements~~subrequirements in R1.1

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		provide data for existing and proposed SPSs as specified in Reliability Standard PRC-013-0_R1.		through R1.3 as specified in Reliability Standard PRC-013-0_R1.	through R1.3 as specified in Reliability Standard PRC-013-0_R1.	through R1.3 as specified in Reliability Standard PRC-013-0_R1.
PRC-015-0	R2.	The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall have evidence it reviewed new or functionally modified SPSs in accordance with the Regional Reliability Organization's procedures as defined in Reliability Standard PRC-012-0_R1 prior to being placed in service.	The responsible entity was not compliant in that evidence that it reviewed new or functionally modified SPSs in accordance with the Regional Reliability Organization's procedures did not address one of the ~~elements~~subrequirements in R1.1 through R1.9 as specified in Reliability Standard PRC-012-0_R1 prior to being placed in service.	The responsible entity was not compliant in that evidence that it reviewed new or functionally modified SPSs in accordance with the Regional Reliability Organization's procedures did not address two ~~to four~~ of the ~~elements~~subrequirements in R1.1 through R1.9 as specified in Reliability Standard PRC-012-0_R1 prior to being placed in service.	The responsible entity was not compliant in that evidence that it reviewed new or functionally modified SPSs in accordance with the Regional Reliability Organization's procedures did not address ~~five to seven~~three of the ~~elements~~subrequirements in R1.1 through R1.9 as specified in Reliability Standard PRC-012-0_R1 prior to being placed in service.	The responsible entity was not compliant in that evidence that it reviewed new or functionally modified SPSs in accordance with the Regional Reliability Organization's procedures did not address ~~eight~~four or more of the ~~elements~~subrequirements in R1.1 through R1.9 as specified in Reliability Standard PRC-012-0_R1 prior to being placed in service.
PRC-015-0	R3.	The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall provide documentation of SPS data and the	The responsible entity provided documentation of its SPS data and the results of the studies that show compliance of new or functionally	The responsible entity provided documentation of its SPS data and the results of the studies that show compliance of new or functionally	The responsible entity provided documentation of its SPS data and the results of the studies that show compliance of new or functionally	The responsible entity provided documentation of its SPS data and the results of the studies that show compliance of new or functionally

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		results of studies that show compliance of new or functionally modified SPSs with NERC Reliability Standards and Regional Reliability Organization criteria to affected Regional Reliability Organizations and NERC on request (within 30 calendar days).	modified SPSs more than 30 calendar days but less than or equal to 40 calendar days following a request from its Regional Reliability Organization ~~and/~~or NERC.	modified SPSs more than 40 calendar days but less than or equal to 50 calendar days following a request from its Regional Reliability Organization ~~and/~~or NERC.	modified SPSs more than 50 calendar days but less than or equal to 60 calendar days following a request from its Regional Reliability Organization ~~and/~~or NERC.	modified SPSs ~~for~~ more than 60 calendar days following a request from its Regional Reliability Organization ~~and/~~or NERC.
PRC-016-0.1	R1.	The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall analyze its SPS operations and maintain a record of all misoperations in accordance with the Regional SPS review procedure specified in Reliability Standard PRC-012-0_R1.	~~The responsible entity was not compliant in that evidence that it analyzed its SPS operations and maintained a record of all misoperations in accordance with the Regional SPS review procedure did not address one of the elements in R1.1 through R1.9 as specified in Reliability Standard PRC-012-0_R1.~~N/A	~~The responsible entity was not compliant in that evidence that it analyzed its SPS operations and maintained a record of all misoperations in accordance with the Regional SPS review procedure did not address two to four of the elements in R1.1 through R1.9 as specified in Reliability Standard PRC-012-0_R1.~~N/A	~~The responsible entity was not compliant in that evidence that it analyzed its SPS operations and maintained a record of all misoperations in accordance with the Regional SPS review procedure did not address five to seven of the elements in R1.1 through R1.9 as specified in Reliability Standard PRC-012-0_R1.~~N/A	The responsible entity ~~was not compliant in~~ that ~~evidence that it analyzed~~owns an SPS did not analyze its SPS operations and maintain~~ed~~ a record of all ~~misoperations~~Misoperations in accordance with the Regional SPS review procedure ~~did not address eight or more of the elements in R1.1 through R1.9 as~~ specified in Reliability Standard PRC-012-0_~~R~~R 1.

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PRC-016-0.1	R2.	The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall take corrective actions to avoid future misoperations.	~~The~~ For each Misoperation, the responsible entity that owns an SPS did not take 5% or less of the corrective actions designed to avoid future SPS ~~misoperations for no more than 25% of the events.~~Misoperations.	~~The~~ For each Misoperation, the responsible entity that owns an SPS did not take more than 5% up to (and including) 10% of the corrective actions designed to avoid future SPS ~~misoperations for more than 25% but less than or equal to 50% of the events.~~Misoperations.	~~The~~ For each Misoperation, the responsible entity that owns an SPS did not take more than 10% up to (and including) 15% of the corrective actions designed to avoid future SPS ~~misoperations for more than 50% but less than or equal to 75% of the events.~~Misoperations.	~~The~~ For each Misoperation, the responsible entity that owns an SPS did not take more than 15% of the corrective actions designed to avoid future SPS ~~misoperations for more than 75% of the events.~~ Misoperations.
PRC-016-0.1	R3.	The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall provide documentation of the misoperation analyses and the corrective action plans to its Regional Reliability Organization and NERC on request (within 90 calendar days).	The responsible entity provided documentation of its SPS ~~misoperation~~Misoperation analyses and the corrective action plans more than 90 calendar days but less than or equal to 120 calendar days following a request from its Regional Reliability Organization ~~and/~~or NERC.	The responsible entity provided documentation of its SPS ~~misoperation~~Misoperation analyses and the corrective action plans more than 120 calendar days but less than or equal to ~~150~~130 calendar days following a request from its Regional Reliability Organization ~~and/~~or NERC.	The responsible entity provided documentation of its SPS ~~misoperation~~Misoperation analyses and the corrective action plans more than ~~150~~ 130 calendar days but less than or equal ~~to 180~~to140 calendar days following a request from its Regional Reliability Organization ~~and/~~or NERC.	The responsible entity provided documentation of its SPS ~~misoperation~~Misoperation analyses and the corrective action plans more than ~~180~~140 calendar days following a request from its Regional Reliability Organization ~~and/~~or NERC. OR Did not provide the documentation.
PRC-017-0	R1.	The Transmission	The responsible	The responsible	The responsible	The responsible

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Owner, Generator Owner, and Distribution Provider that owns an SPS shall have a system maintenance and testing program(s) in place. The program(s) shall include:	entity's SPS ~~system~~equipment maintenance and testing program did not address one of the ~~elements~~subrequirements in R1.~~1~~2 through R1.6. OR The responsible entity's SPS program did not address one of the equipment classes as specified in R1.1.1 through R1.1.4.	entity's SPS ~~system~~equipment maintenance and testing program did not address two ~~or three~~ of the ~~elements~~subrequirements in R1.~~1~~2 through R1.6. OR The responsible entity's SPS program did not address two of the equipment classes as specified in R1.1.1 through R1.1.4.	entity's SPS ~~system~~equipment maintenance and testing program did not address ~~four or five~~three of the ~~elements~~subrequirements in R1.~~1~~2 through R1.6. OR The responsible entity's SPS program did not address three of the equipment classes as specified in R1.1.1 through R1.1.4.	entity's SPS ~~system~~equipment maintenance and testing program did not address ~~any~~four or more of the ~~elements~~subrequirements in R1.~~1~~2 through R1.6. OR The responsible entity's SPS program did not address any of the equipment classes as specified in R1.1.1 through R1.1.4.
PRC-017-0	R1.1.	SPS identification shall include but is not limited to:	~~The responsible entity's SPS program identification did not address one of the elements in R1.1.1 through R1.1.4.~~N/A	~~The responsible entity's SPS program identification did not address two of the elements in R1.1.1 through R1.1.4.~~N/A	~~The responsible entity's SPS program identification did not address three of the elements in R1.1.1 through R1.1.4.~~N/A	~~The responsible entity's SPS program identification did not address any of the elements in R1.1.1 through R1.1.4.~~N/A
PRC-017-0	R1.1.1.	Relays.	~~The responsible entity's SPS program identification was missing no more than 25% of the applicable relays.~~N/A	~~The responsible entity's SPS program identification was missing more than 25% but less than or equal to 50% of the applicable relays.~~N/A	~~The responsible entity's SPS program identification was missing more than 50% but less than or equal to 75% of the applicable relays.~~N/A	~~The responsible entity's SPS program identification was missing more than 75% of the applicable relays.~~N/A
PRC-017-0	R1.1.2.	Instrument transformers.	~~The responsible entity's SPS program identification was~~	~~The responsible entity's SPS program identification was~~	~~The responsible entity's SPS program identification was~~	~~The responsible entity's SPS program identification was~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			~~missing no more than 25% of the applicable instrument transformers.~~N/A	~~missing more than 25% but less than or equal to 50% of the applicable instrument transformers.~~N/A	~~missing more than 50% but less than or equal to 75% of the applicable instrument transformers.~~N/A	~~missing more than 75% of the applicable instrument transformers.~~N/A
PRC-017-0	R1.1.3.	Communications systems, where appropriate.	~~The responsible entity's SPS program identification was missing no more than 25% of the appropriate communication systems.~~N/A	~~The responsible entity's SPS program identification was missing more than 25% but less than or equal to 50% of the appropriate communication systems.~~N/A	~~The responsible entity's SPS program identification was missing more than 50% but less than or equal to 75% of the appropriate communication systems.~~N/A	~~The responsible entity's SPS program identification was missing more than 75% of the appropriate communication systems.~~N/A
PRC-017-0	R1.1.4.	Batteries.	~~The responsible entity's SPS program identification was missing no more than 25% of the applicable batteries.~~N/A	~~The responsible entity's UVLS program system identification was missing more than 25% but less than or equal to 50% of the applicable batteries.~~N/A	~~The responsible entity's UVLS program system identification was missing more than 50% but less than or equal to 75% of the applicable batteries.~~N/A	~~The responsible entity's UVLS program system identification was missing more than 75% of the applicable batteries.~~N/A
PRC-017-0	R1.2.	Documentation of maintenance and testing intervals and their basis.	~~The responsible entity's SPS maintenance and testing program was non-compliant in that documentation of maintenance and testing intervals and their basis was missing for no more~~	~~The responsible entity's SPS maintenance and testing program was non-compliant in that documentation of maintenance and testing intervals and their basis was missing for more~~	~~The responsible entity's SPS maintenance and testing program was non-compliant in that documentation of maintenance and testing intervals and their basis was missing for more~~	~~The responsible entity's SPS maintenance and testing program was non-compliant in that documentation of maintenance and testing intervals and their basis was missing for more~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			~~than 25% of the SPS equipment.~~N/A	~~than 25% but less than or equal to 50% of the SPS equipment.~~N/A	~~than 50% but less than or equal to 75% of the SPS equipment.~~N/A	~~than 75% of the SPS equipment.~~N/A
PRC-017-0	R1.3.	Summary of testing procedure.	~~The responsible entity's SPS maintenance and testing program was non-compliant in that a summary of the testing procedure was missing for no more than 25% of the SPS equipment.~~N/A	~~The responsible entity's SPS maintenance and testing program was non-compliant in that a summary of the testing procedure was missing for more than 25% but less than or equal to 50% of the SPS equipment.~~N/A	~~The responsible entity's SPS maintenance and testing program was non-compliant in that a summary of the testing procedure was missing for more than 50% but less than or equal to 75% of the SPS equipment.~~N/A	~~The responsible entity's SPS maintenance and testing program was non-compliant in that a summary of the testing procedure was missing for more than 75% of the SPS equipment.~~N/A
PRC-017-0	R1.4.	Schedule for system testing.	~~The responsible entity's SPS maintenance and testing program was non-compliant in that a schedule for system testing was missing for no more than 25% of the SPS equipment.~~N/A	~~The responsible entity's SPS equipment maintenance and testing program was non-compliant in that a schedule for system testing was missing for more than 25% but less than or equal to 50% of the SPS equipment.~~N/A	~~The responsible entity's SPS maintenance and testing program was non-compliant in that a schedule for system testing was missing for more than 50% but less than or equal to 75% of the SPS equipment.~~N/A	~~The responsible entity's SPS maintenance and testing program was non-compliant in that a schedule for system testing was missing for more than 75% of the SPS equipment.~~N/A
PRC-017-0	R1.5.	Schedule for system maintenance.	~~The responsible entity's SPS maintenance and testing program was non-compliant in~~	~~The responsible entity's SPS maintenance and testing program was non-compliant in~~	~~The responsible entity's SPS maintenance and testing program was non-compliant in~~	~~The responsible entity's SPS maintenance and testing program was non-compliant in~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			~~that a schedule for system maintenance was missing for no more than 25% of the SPS equipment.~~N/A	~~that a schedule for system maintenance was missing for more than 25% but less than or equal to 50% of the SPS equipment.~~N/A	~~that a schedule for system maintenance was missing for more than 50% but less than or equal to 75% of the SPS equipment.~~N/A	~~that a schedule for system maintenance was missing for more than 75% of the SPS equipment.~~N/A
PRC-017-0	R1.6.	Date last tested/maintained.	~~The responsible entity's SPS maintenance and testing program was non-compliant in that the date last tested/maintained was missing for no more than 25% of the SPS equipment.~~N/A	~~The responsible entity's SPS maintenance and testing program was non-compliant in that the date last tested/maintained was missing for more than 25% but less than or equal to 50% of the SPS equipment.~~N/A	~~The responsible entity's SPS maintenance and testing program was non-compliant in that the date last tested/maintained was missing for more than 50% but less than or equal to 75% of the SPS equipment.~~N/A	~~The responsible entity's SPS maintenance and testing program was non-compliant in that the date last tested/maintained was missing for more than 75% of the SPS equipment.~~N/A
PRC-018-1	R1.	Each Transmission Owner and Generator Owner required to install DMEs by its Regional Reliability Organization (reliability standard PRC-002 Requirements 1-3) shall have DMEs installed that meet the following requirements:	N/A	N/A	The ~~responsible entity is not compliant in that the~~ installation of DMEs does not include one of the ~~elements~~subrequirements in R1.1 and R1.2.	The ~~responsible entity is not compliant in that the~~ installation of DMEs does not include any of the ~~elements~~subrequirements in R1.1 and R1.2.
PRC-018-1	R1.1.	Internal Clocks in	~~Less than or equal to~~	~~Less than or equal to~~	~~Less than or equal to~~	~~Greater than 50% of~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		DME devices shall be synchronized to within 2 milliseconds or less of Universal Coordinated Time scale (UTC)	~~25% of DME devices did not comply with R1.1~~N/A	~~37.5% but greater than 25% of DME devices did not comply with R1.1~~N/A	~~50% but greater than 37.5% of DME devices did not comply with R1.1~~N/A	~~DME devices did not did not comply with R1.1~~N/A
PRC-018-1	R1.2.	Recorded data from each Disturbance shall be retrievable for ten calendar days.	~~Less than or equal to 12% of installed DME devices did not comply with R1.2~~N/A	~~Less than or equal to 18% but greater than 12% of installed DME devices did not comply with R1.2~~N/A	~~Less than or equal to 24% but greater than 18% of installed DME devices did not comply with R1.2~~N/A	~~Greater than 24% of installed DME devices did not did not comply with R1.2~~N/A
PRC-018-1	R2.	The Transmission Owner and Generator Owner shall each install DMEs in accordance with its Regional Reliability Organization's installation requirements (reliability standard PRC-002 Requirements 1 through 3).	The responsible entity ~~is non-compliant in that no more than 10%~~failed to install 5% or less of the DME devices ~~were not installed~~ in accordance with its Regional Reliability Organization's installation requirements as defined in PRC-002 R~~equirements~~1 through R3.	The responsible entity ~~is non-compliant in that~~failed to install more than 5% up to (and including) 10% ~~but less than or equal to 20%~~ of the DME devices ~~were not installed~~ in accordance with its Regional Reliability Organization's installation requirements as defined in PRC-002 R~~equirements~~1 through R3.	The responsible entity ~~is non-compliant in that~~failed to install more than ~~30~~15% of the DME devices ~~were not installed~~ in accordance with its Regional Reliability Organization's installation requirements as defined in PRC-002 R~~equirements~~1 through ~~3.~~ R3.	The responsible entity ~~is non-compliant in that~~failed to install more than ~~30~~15% of the DME devices ~~were not installed~~ in accordance with its Regional Reliability Organization's installation requirements as defined in PRC-002 R~~equirements~~1 through ~~3.~~ R3.
PRC-018-1	R3.	The Transmission Owner and Generator Owner	Evidence that t~~T~~he responsible entity ~~was not compliant in~~	Evidence that t~~T~~he responsible entity ~~was not compliant in~~	Evidence that t~~T~~he responsible entity ~~was not compliant in~~	Evidence that t~~T~~he responsible entity ~~was not compliant in~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		shall each maintain, and report to its Regional Reliability Organization on request, the following data on the DMEs installed to meet that region's installation requirements (reliability standard PRC-002 Requirements1.1, 2.1 and 3.1):	~~that evidence that it~~ maintained data on the DMEs installed to meet that region's installation requirements was missing or not reported for one of the ~~elements~~subrequirements ~~-~~in R~~equirements~~ 3.1 through R3.8.	~~that evidence that it~~ maintained data on the DMEs installed to meet that region's installation requirements was missing or not reported for two ~~or three~~ of the ~~elements~~ subrequirements in R~~Requirements~~ 3.1 through R3.8.	~~that evidence that it~~ maintained data on the DMEs installed to meet that region's installation requirements was missing or not reported for three~~four or five~~ of the ~~elements~~ subrequirements in R~~equirements~~ 3.1 through R3.8.	~~that evidence that it~~ maintained data on the DMEs installed to meet that region's installation requirements was missing or not reported for four or more ~~than five~~ of the ~~elements~~ subrequirements in R~~equirements~~ 3.1 through R3.8.
PRC-018-1	R3.1.	Type of DME (sequence of event recorder, fault recorder, or dynamic disturbance recorder).	~~Less than or equal to 25% of the required data per R3.1 was not maintained or reported.~~N/A	~~Less than or equal to 37.5% but greater than 25% of the required data per R3.1 was not maintained or reported.~~N/A	~~Less than or equal to 50% but greater than 37.5% of the required data per R3.1 was not maintained or reported.~~N/A	~~Greater than 50% of the required data per R3.1 was not maintained or reported.~~N/A
PRC-018-1	R3.2.	Make and model of equipment.	~~Less than or equal to 25% of the required data per R3.2 was not maintained or reported.~~N/A	~~Less than or equal to 37.5% but greater than 25% of the required data per R3.2 was not maintained or reported.~~N/A	~~Less than or equal to 50% but greater than 37.5% of the required data per R3.2 was not maintained or reported.~~N/A	~~Greater than 50% of the required data per R3.2 was not maintained or reported.~~N/A
PRC-018-1	R3.3.	Installation location.	~~Less than or equal to 25% of the required data per R3.3 was not maintained or reported.~~N/A	~~Less than or equal to 37.5% but greater than 25% of the required data per R3.3 was not maintained or~~	~~Less than or equal to 50% but greater than 37.5% of the required data per R3.3 was not maintained or~~	~~Greater than 50% of the required data per R3.3 was not maintained or reported.~~N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				~~reported.~~N/A	~~reported.~~N/A	
PRC-018-1	R3.4.	Operational status.	~~Less than or equal to 25% of the required data per R3.4 was not maintained or reported.~~N/A	~~Less than or equal to 37.5% but greater than 25% of the required data per R3.4 was not maintained or reported.~~N/A	~~Less than or equal to 50% but greater than 37.5% of the required data per R3.4 was not maintained or reported.~~N/A	~~Greater than 50% of the required data per R3.4 was not maintained or reported.~~N/A
PRC-018-1	R3.5.	Date last tested.	~~Less than or equal to 25% of the required data per R3.5 was not maintained or reported.~~N/A	~~Less than or equal to 37.5% but greater than 25% of the required data per R3.5 was not maintained or reported.~~N/A	~~Less than or equal to 50% but greater than 37.5% of the required data per R3.5 was not maintained or reported.~~N/A	~~Greater than 50% of the required data per R3.5 was not maintained or reported.~~N/A
PRC-018-1	R3.6.	Monitored elements, such as transmission circuit, bus section, etc.	~~Less than or equal to 25% of the required data per R3.6 was not maintained or reported.~~N/A	~~Less than or equal to 37.5% but greater than 25% of the required data per R3.6 was not maintained or reported.~~N/A	~~Less than or equal to 50% but greater than 37.5% of the required data per R3.6 was not maintained or reported.~~N/A	~~Greater than 50% of the required data per R3.6 was not maintained or reported.~~N/A
PRC-018-1	R3.7.	Monitored devices, such as circuit breaker, disconnect status, alarms, etc.	~~Less than or equal to 25% of the required data per R3.7 was not maintained or reported.~~N/A	~~Less than or equal to 37.5% but greater than 25% of the required data per R3.7 was not maintained or reported.~~N/A	~~Less than or equal to 50% but greater than 37.5% of the required data per R3.7 was not maintained or reported.~~N/A	~~Greater than 50% of the required data per R3.7 was not maintained or reported.~~N/A
PRC-018-1	R3.8.	Monitored electrical quantities, such as voltage, current, etc.	~~Less than or equal to 25% of the required data per R3.8 was not maintained or~~	~~Less than or equal to 37.5% but greater than 25% of the required data per~~	~~Less than or equal to 50% but greater than 37.5% of the required data per~~	~~Greater than 50% of the required data per R3.8 was not maintained or~~

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			~~reported.~~N/A	~~R3.8 was not maintained or reported.~~N/A	~~R3.8 was not maintained or reported.~~N/A	~~reported.~~N/A
PRC-018-1	R4.	The Transmission Owner and Generator Owner shall each provide Disturbance data (recorded by DMEs) in accordance with its Regional Reliability Organization's requirements (reliability standard PRC-002 Requirement 4).	The responsible entity ~~is not compliant in that it~~ did not provide 5% or less ~~than or equal to 10%~~ of the disturbance data (recorded by DMEs) in accordance with its Regional Reliability Organization's requirements.	The responsible entity ~~is not compliant in that it~~ did not provide ~~less~~more than ~~or equal~~5% up to ~~20% but greater than~~(and including) 10% of the disturbance data (recorded by DMEs) in accordance with its Regional Reliability Organization's requirements.	The responsible entity ~~is not compliant in that it~~ did not provide ~~less~~more than ~~or equal~~10% up to ~~30% but greater than 20~~(and including) 15% of the disturbance data (recorded by DMEs) in accordance with its Regional Reliability Organization's requirements.	The responsible entity ~~is not compliant in that it~~ did not provide ~~greater~~more than ~~30~~15% of the disturbance data (recorded by DMEs) in accordance with its Regional Reliability Organization's requirements.
PRC-018-1	R5.	The Transmission Owner and Generator Owner shall each archive all data recorded by DMEs for Regional Reliability Organization-identified events for at least three years.	~~The~~ 5% or less of the responsible ~~entity is not compliant in that no more than 25% of the~~ entity's data recorded by DMEs for Regional Reliability Organization-identified events was not archived for at least three years.	~~The responsible entity is not compliant in that more~~More than ~~25% but less than or equal~~5% up to ~~50~~(and including) 10% of the responsible entity's data recorded by DMEs for Regional Reliability Organization-identified events was not archived for at	~~The responsible entity is not compliant in that more~~More than ~~50% but less than or equal~~10% up to ~~75~~(and including) 15% of the responsible entity's data recorded by DMEs for Regional Reliability Organization-identified events was not archived for at	~~The responsible entity is not compliant in that more~~More than ~~75~~15% of the responsible entity's data recorded by DMEs for Regional Reliability Organization-identified events was not archived for at least three years.

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				least three years.	least three years.	
PRC-021-1	R1.	Each Transmission Owner and Distribution Provider that owns a UVLS program to mitigate the risk of voltage collapse or voltage instability in the BES shall annually update its UVLS data to support the Regional UVLS program database. The following data shall be provided to the Regional Reliability Organization for each installed UVLS system:	UVLS data was provided but did not address one of the ~~elements~~subrequirements in R1.1 through R1.5.	UVLS data was provided but did not address two of the ~~elements~~subrequirements in R1.1 through R1.5.	UVLS data was provided but did not address three of the ~~elements~~subrequirements in R1.1 through R1.5.	No annual UVLS data was provided~~-~~. OR UVLS data was provided but did not address four or more of the ~~elements~~subrequirements in R1.1 through R1.5.
PRC-021-1	R1.1.	Size and location of customer load, or percent of connected load, to be interrupted.	~~The responsible entity is non-compliant in the reporting of no more than 25% of the size or location of customer load, or percent of customer load to be interrupted.~~N/A	~~The responsible entity is non-compliant in the reporting of more than 25% but less than or equal to 50% of the size or location of customer load, or percent of customer load to be interrupted.~~N/A	~~The responsible entity is non-compliant in the reporting of more than 50% but less than or equal to 75% of the size or location of customer load, or percent of customer load to be interrupted.~~N/A	~~The responsible entity is non-compliant in the reporting of more than 75% of the size or location of customer load, or percent of customer load to be interrupted.~~N/A
PRC-021-1	R1.2.	Corresponding voltage set points	~~The responsible entity is non-~~	~~The responsible entity is non-~~	~~The responsible entity is non-~~	~~The responsible entity is non-~~

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		and overall scheme clearing times.	~~compliant in the reporting of no more than 25% of the corresponding voltage set points and overall scheme clearing times.~~N/A	~~compliant in the reporting of more than 25% but less than or equal to 50% of the corresponding voltage set points and overall scheme clearing times.~~N/A	~~compliant in the reporting of more than 50% but less than or equal to 75% of the corresponding voltage set points and overall scheme clearing times.~~N/A	~~compliant in the reporting of more than 75% of the corresponding voltage set points and overall scheme clearing times.~~N/A
PRC-021-1	R1.3.	Time delay from initiation to trip signal.	~~The responsible entity is non-compliant in the reporting of no more than 25% of the time delay from initiation to trip signal data.~~N/A	~~The responsible entity is non-compliant in the reporting of more than 25% but less than or equal to 50% of the time delay from initiation to trip signal data.~~N/A	~~The responsible entity is non-compliant in the reporting of more than 50% but less than or equal to 75% of the time delay from initiation to trip signal data.~~N/A	~~The responsible entity is non-compliant in the reporting of more than 75% of the time delay from initiation to trip signal data.~~N/A
PRC-021-1	R1.4.	Breaker operating times.	~~The responsible entity is non-compliant in the reporting of no more than 25% of the breaker operating times.~~N/A	~~The responsible entity is non-compliant in the reporting of more than 25% but less than or equal to 50% of the breaker operating times.~~N/A	~~The responsible entity is non-compliant in the reporting of more than 50% but less than or equal to 75% of the breaker operating times.~~N/A	~~The responsible entity is non-compliant in the reporting of more than 75% of the breaker operating times.~~N/A
PRC-021-1	R1.5.	Any other schemes that are part of or impact the UVLS programs such as related generation protection, islanding schemes, automatic load restoration schemes, UFLS and	~~The responsible entity is non-compliant in the reporting of no more than 25% of any other schemes that are part of or impact the UVLS programs such as related~~	~~The responsible entity is non-compliant in the reporting of more than 25% but less than or equal to 50% of any other schemes that are part of or impact the UVLS~~	~~The responsible entity is non-compliant in the reporting of more than 50% but less than or equal to 75% of any other schemes that are part of or impact the UVLS~~	~~The responsible entity is non-compliant in the reporting of more than 75% of any other schemes that are part of or impact the UVLS programs such as related~~

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		Special Protection Systems.	~~generation protection, islanding schemes, automatic load restoration schemes, UFLS and Special Protection Systems.~~N/A	~~programs such as related generation protection, islanding schemes, automatic load restoration schemes, UFLS and Special Protection Systems.~~N/A	~~programs such as related generation protection, islanding schemes, automatic load restoration schemes, UFLS and Special Protection Systems.~~N/A	~~generation protection, islanding schemes, automatic load restoration schemes, UFLS and Special Protection Systems.~~N/A
PRC-021-1	R2.	Each Transmission Owner and Distribution Provider that owns a UVLS program shall provide its UVLS program data to the Regional Reliability Organization within 30 calendar days of a request.	The responsible entity updated its UVLS data more than 30 calendar days but less than or equal to 40 calendar days following a request from its Regional Reliability Organization.	The responsible entity updated its UVLS data more than 40 calendar days but less than or equal to 50 calendar days following a request from its Regional Reliability Organization.	The responsible entity updated its UVLS data more than 50 calendar days but less than or equal to 60 calendar days following a request from its Regional Reliability Organization.	The responsible entity did not update its UVLS data for more than 60 calendar days following a request from its Regional Reliability Organization.
PRC-022-1	R1.	Each Transmission Operator, Load-Serving Entity, and Distribution Provider that operates a UVLS program to mitigate the risk of voltage collapse or voltage instability in the BES shall analyze and document all UVLS operations and Misoperations. The analysis shall	~~The responsible entity failed to analyze and document no more than 25% of all UVLS operations and misoperations.~~The overall analysis program did not address one of the subrequirements in R1.1 through R1.5.	The ~~responsible entity failed to analyze and document more than 25% but less than or equal to 50% of all UVLS operations and misoperations or the~~ overall analysis program did not address ~~one~~two of the ~~elements~~subrequirements in R1.1 through R1.5.	The ~~responsible entity failed to analyze and document more than 50% but less than or equal to 75% of all UVLS operations and misoperations or the~~ overall analysis program did not address ~~two or~~ three of the ~~elements~~subrequirements in R1.1 through R1.5.	The responsible entity failed to analyze and document ~~more than 75% of all~~a UVLS operation~~s~~ and ~~misoperations or the~~Misoperation. OR The overall analysis program did not address four or more of the ~~elements~~subrequirements in R1.1

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		include:				through R1.5.
PRC-022-1	R1.1.	A description of the event including initiating conditions.	~~The responsible entity's analysis is missing a description of the event including initiating conditions for no more than 25% of all UVLS operations and misoperations.~~N/A	~~The responsible entity's analysis is missing a description of the event including initiating conditions for more than 25% but less than or equal to 50% of all UVLS operations and misoperations.~~N/A	~~The responsible entity's analysis is missing a description of the event including initiating conditions for more than 50% but less than or equal to 75% of all UVLS operations and misoperations.~~N/A	~~The responsible entity's analysis is missing a description of the event including initiating conditions for more than 75% of all UVLS operations and misoperations.~~N/A
PRC-022-1	R1.2.	A review of the UVLS set points and tripping times.	~~The responsible entity's analysis is missing a review of the UVLS set points and tripping times for no more than 25% of all UVLS operations and misoperations.~~N/A	~~The responsible entity's analysis is missing a review of the UVLS set points and tripping times for more than 25% but less than 50% of all UVLS operations and misoperations.~~N/A	~~The responsible entity's analysis is missing a review of the UVLS set points and tripping times for more than 50% but less than 75% of all UVLS operations and misoperations.~~N/A	~~The responsible entity's analysis is missing a review of the UVLS set points and tripping times for more than 75% of all UVLS operations and misoperations.~~N/A
PRC-022-1	R1.3.	A simulation of the event, if deemed appropriate by the Regional Reliability Organization. For most events, analysis of sequence of events may be sufficient and dynamic simulations may not be needed.	~~The responsible entity's analysis is missing a simulation of the event, if deemed appropriate by the Regional Reliability Organization for no more than 25% of all UVLS operations and misoperations.~~N/A	~~The responsible entity's analysis is missing a simulation of the event, if deemed appropriate by the Regional Reliability Organization for more than 25% but less than or equal to 50% of all UVLS operations and~~	~~The responsible entity's analysis is missing a simulation of the event, if deemed appropriate by the Regional Reliability Organization for more than 50% but less than or equal to 75% of all UVLS operations and~~	~~The responsible entity's analysis is missing a simulation of the event, if deemed appropriate by the Regional Reliability Organization for more than 75% of all UVLS operations and misoperations.~~N/A

Violation Severity Level Matrix (PRC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				~~misoperations.~~N/A	~~misoperations.~~N/A	
PRC-022-1	R1.4.	A summary of the findings.	~~The responsible entity's analysis is missing a summary of the findings for no more than 25% of all UVLS operations and misoperations.~~N/A	~~The responsible entity's analysis is missing a summary of the findings for more than 25% but less than or equal to 50% of all UVLS operations and misoperations.~~N/A	~~The responsible entity's analysis is missing a summary of the findings for more than 50% but less than or equal to 75% of all UVLS operations and misoperations.~~N/A	~~The responsible entity's analysis is missing a summary of the findings for more than 75% of all UVLS operations and misoperations.~~N/A
PRC-022-1	R1.5.	For any Misoperation, a Corrective Action Plan to avoid future Misoperations of a similar nature.	~~The responsible entity's analysis is missing a Corrective Action Plan to avoid future Misoperations of a similar nature for no more than 25% of all UVLS operations and misoperations.~~N/A	~~The responsible entity's analysis is missing a Corrective Action Plan to avoid future Misoperations of a similar nature for more than 25% but less than or equal to 50% of all UVLS operations and misoperations.~~N/A	~~The responsible entity's analysis is missing a Corrective Action Plan to avoid future Misoperations of a similar nature for more than 50% but less than or equal to 75% of all UVLS operations and misoperations.~~N/A	~~The responsible entity's analysis is missing a Corrective Action Plan to avoid future Misoperations of a similar nature for more than 75% of all UVLS operations and misoperations.~~N/A
PRC-022-1	R2.	Each Transmission Operator, Load-Serving Entity, and Distribution Provider that operates a UVLS program shall provide documentation of its analysis of UVLS program performance to its Regional Reliability	The responsible entity provided documentation of the analysis of UVLS program performance more than 90 calendar days but less than or equal to 120 calendar days following a request from its Regional Reliability	The responsible entity provided documentation of the analysis of UVLS program performance more than 120 calendar days but less than or equal to ~~150~~130 calendar days following a request from its Regional Reliability	The responsible entity provided documentation of the analysis of UVLS program performance more than ~~150~~ 130 calendar days but less than or equal to ~~180~~140 calendar days following a request from its Regional Reliability	The responsible entity did not provide documentation of the analysis of UVLS program performance for more than ~~180~~140 calendar days following a request from its Regional Reliability Organization.

Violation Severity Level Matrix (PRC)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Organization within 90 calendar days of a request.	Organization.	Organization.	Organization.	

Violation Severity Level Matrix (TOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
TOP-001-1	R2.	Each Transmission Operator shall take immediate actions to alleviate operating emergencies including curtailing transmission service or energy schedules, operating equipment (e.g., generators, phase shifters, breakers), shedding firm load, etc.	N/A	N/A	N/A	The Transmission Operator failed to have evidence that it took immediate actions to alleviate operating emergencies including curtailing transmission service or energy schedules, operating equipment (e.g., generators, phase shifters, breakers), shedding firm load, etc.
TOP-001-1	R3.	Each Transmission Operator, Balancing Authority, and Generator Operator shall comply with reliability directives issued by the Reliability Coordinator, and each Balancing Authority and Generator Operator shall comply with reliability directives issued by the Transmission Operator, unless such actions would violate safety, equipment, regulatory or statutory requirements. Under these circumstances the	N/A	N/A	N/A	The responsible entity failed to comply with reliability directives issued by the Reliability Coordinator or the Transmission Operator (when applicable), when said directives would not have resulted in actions that would violate safety, equipment, regulatory or statutory requirements, or under circumstances that said directives would have resulted in actions that would violate safety, equipment, regulatory or statutory requirements the

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Transmission Operator, Balancing Authority, or Generator Operator shall immediately inform the Reliability Coordinator or Transmission Operator of the inability to perform the directive so that the Reliability Coordinator or Transmission Operator can implement alternate remedial actions.				responsible entity failed to inform the Reliability Coordinator or Transmission Operator (when applicable) of the inability to perform the directive so that the Reliability Coordinator or Transmission Operator could implement alternate remedial actions.
TOP-001-1	R4.	Each Distribution Provider and Load-Serving Entity shall comply with all reliability directives issued by the Transmission Operator, including shedding firm load, unless such actions would violate safety, equipment, regulatory or statutory requirements. Under these circumstances, the Distribution Provider or Load-Serving Entity shall immediately inform the Transmission Operator of the inability to	N/A	N/A	N/A	The responsible entity failed to comply with all reliability directives issued by the Transmission Operator, including shedding firm load, when said directives would not have resulted in actions that would violate safety, equipment, regulatory or statutory requirements, or under circumstances when said directives would have violated safety, equipment, regulatory or statutory requirements, the responsible entity

Violation Severity Level Matrix (TOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		perform the directive so that the Transmission Operator can implement alternate remedial actions.				failed to immediately inform the Transmission Operator of the inability to perform the directive so that the Transmission Operator could implement alternate remedial actions.
TOP-001-1	R5.	Each Transmission Operator shall inform its Reliability Coordinator and any other potentially affected Transmission Operators of real-time or anticipated emergency conditions, and take actions to avoid, when possible, or mitigate the emergency.	N/A	~~N/A~~The Transmission Operator failed to inform its Reliability Coordinator and any other potentially affected Transmission Operators of real-time or anticipated emergency conditions, but did take actions to avoid, when possible, or mitigate the emergency.	N/A	The Transmission Operator failed to inform its Reliability Coordinator and any other potentially affected Transmission Operators of real-time or anticipated emergency conditions, ~~or~~and failed to take actions to avoid, when possible, or mitigate the emergency.
TOP-001-1	R6.	Each Transmission Operator, Balancing Authority, and Generator Operator shall render all available emergency assistance to others as	N/A	N/A	N/A	The responsible entity failed to render all available emergency assistance to others as requested, after the requesting entity had implemented its

Violation Severity Level Matrix (TOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		requested, provided that the requesting entity has implemented its comparable emergency procedures, unless such actions would violate safety, equipment, or regulatory or statutory requirements.				comparable emergency procedures, when said assistance would not have resulted in actions that would violate safety, equipment, or regulatory or statutory requirements.
TOP-001-1	R7.	Each Transmission Operator and Generator Operator shall not remove Bulk Electric System facilities from service if removing those facilities would burden neighboring systems unless:	N/A	N/A	N/A	The responsible entity removed Bulk Electric System facilities from service ~~under conditions other than those listed in TOP-001-1 R7.1 through R7.3~~ and removal of said facilities burdened a neighboring system, without complying with the applicable requirements listed in R7.1 through R7.3.
TOP-001-1	R7.1.	For a generator outage, the Generator Operator shall notify and coordinate with the Transmission Operator. The Transmission Operator shall notify the Reliability Coordinator and other affected Transmission	N/A	N/A	N/A	~~The Generator Operator failed to notify and coordinate with the Transmission Operator, or the Transmission Operator failed to notify the Reliability Coordinator and other affected Transmission~~

Violation Severity Level Matrix (TOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Operators, and coordinate the impact of removing the Bulk Electric System facility.				~~Operators, and coordinate the impact of removing the Bulk Electric System facility.~~N/A
TOP-001-1	R7.2.	For a transmission facility, the Transmission Operator shall notify and coordinate with its Reliability Coordinator. The Transmission Operator shall notify other affected Transmission Operators, and coordinate the impact of removing the Bulk Electric System facility.	N/A	N/A	N/A	~~The Transmission Operator failed to notify and coordinate with its Reliability Coordinator, or failed to notify other affected Transmission Operators, and coordinate the impact of removing the Bulk Electric System facility.~~N/A
TOP-001-1	R7.3.	When time does not permit such notifications and coordination, or when immediate action is required to prevent a hazard to the public, lengthy customer service interruption, or damage to facilities, the Generator Operator shall notify the Transmission Operator, and the Transmission	N/A	N/A	N/A	~~The Generator Operator failed to notify the Transmission Operator, or the Transmission Operator failed to notify its Reliability Coordinator and adjacent Transmission Operators during periods when time did not permit such notifications and coordination, or when~~

Violation Severity Level Matrix (TOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Operator shall notify its Reliability Coordinator and adjacent Transmission Operators, at the earliest possible time.				~~immediate action was required to prevent a hazard to the public, lengthy customer service interruption, or damage to facilities.~~N/A
TOP-001-1	R8.	During a system emergency, the Balancing Authority and Transmission Operator shall immediately take action to restore the Real and Reactive Power Balance. If the Balancing Authority or Transmission Operator is unable to restore Real and Reactive Power Balance it shall request emergency assistance from the Reliability Coordinator. If corrective action or emergency assistance is not adequate to mitigate the Real and Reactive Power Balance, then the Reliability Coordinator, Balancing Authority, and Transmission Operator shall implement firm load	N/A	N/A	N/A	The responsible entity failed to take immediate actions to restore the Real and Reactive Power Balance during a system emergency~~, or the~~. OR The responsible entity failed to request emergency assistance from the Reliability Coordinator during ~~periods~~a period when it was unable to restore the Real and Reactive Power Balance, ~~or during periods~~ OR During a period when corrective actions or emergency assistance was not adequate to mitigate the Real and Reactive Power Balance, the

Violation Severity Level Matrix (TOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		shedding.				responsible entity failed to implement firm load shedding.
TOP-002-2a	R1.	Each Balancing Authority and Transmission Operator shall maintain a set of current plans that are designed to evaluate options and set procedures for reliable operation through a reasonable future time period. In addition, each Balancing Authority and Transmission Operator shall be responsible for using available personnel and system equipment to implement these plans to ensure that interconnected system reliability will be maintained.	N/A	N/A	The responsible entity maintained a set of current plans that were designed to evaluate options and set procedures for reliable operation through a reasonable future time period, but failed to utilize ~~all~~ available personnel and system equipment to implement these plans to ensure that interconnected system reliability ~~will~~would be maintained.	The responsible entity failed to maintain a set of current plans that were designed to evaluate options and set procedures for reliable operation through a reasonable future time period.
TOP-002-2a	R2.	Each Balancing Authority and Transmission Operator shall ensure its operating personnel participate in the system planning and design study processes,	N/A	N/A	N/A	The responsible entity failed to ensure its operating personnel participated in the system planning and design study processes.

Violation Severity Level Matrix (TOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		so that these studies contain the operating personnel perspective and system operating personnel are aware of the planning purpose.				
TOP-002-2a	R4.	Each Balancing Authority and Transmission Operator shall coordinate (where confidentiality agreements allow) its current-day, next-day, and seasonal planning and operations with neighboring Balancing Authorities and Transmission Operators and with its Reliability Coordinator, so that normal Interconnection operation will proceed in an orderly and consistent manner.	~~N/A~~	The responsible entity failed to coordinate (where confidentiality agreements allow) ~~its seasonal planning and~~one of the following three categories of operations (current-day, next-day or seasonal) with ~~neighboring Balancing Authorities and Transmission Operators and with its Reliability Coordinator.~~the applicable entity(ies)	~~N/A~~The responsible entity failed to coordinate (where confidentiality agreements allow) two of the following three categories of operations (current-day, next-day or seasonal) with the applicable entity(ies)	The responsible entity failed to coordinate (where confidentiality agreements allow) ~~its~~ all three of the following categories of operations (current-day, next-day~~, and~~ or seasonal ~~planning and operations~~) with ~~neighboring Balancing Authorities and Transmission Operators and with its Reliability Coordinator.~~the applicable entity(ies)
TOP-002-2a	R5.	Each Balancing Authority and Transmission Operator shall plan to meet scheduled system configuration, generation dispatch,	N/A	N/A	N/A	The responsible entity failed to plan to meet scheduled system configuration, generation dispatch, interchange scheduling and demand patterns.

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		interchange scheduling and demand patterns.				
TOP-002-2a	R6.	Each Balancing Authority and Transmission Operator shall plan to meet unscheduled changes in system configuration and generation dispatch (at a minimum N-1 Contingency planning) in accordance with NERC, Regional Reliability Organization, subregional, and local reliability requirements.	N/A	N/A	N/A	The responsible entity failed to plan to meet unscheduled changes in system configuration and generation dispatch (at a minimum N-1 Contingency planning) in accordance with NERC, Regional Reliability Organization, subregional~~,~~ and local reliability requirements.
TOP-002-2a	R7.	Each Balancing Authority shall plan to meet capacity and energy reserve requirements, including the deliverability/capability for any single Contingency.	N/A	N/A	N/A	The Balancing Authority failed to plan to meet capacity and energy reserve requirements, including the deliverability/capability for any single Contingency.
TOP-002-2a	R8.	Each Balancing Authority shall plan to meet voltage and/or reactive limits, including the deliverability/capability for any single	N/A	N/A	N/A	The Balancing Authority failed to plan to meet voltage and/or reactive limits, including the deliverability/capability for any single

Violation Severity Level Matrix (TOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		contingency.				contingency.
TOP-002-2a	R9.	Each Balancing Authority shall plan to meet Interchange Schedules and ramps.	N/A	N/A	N/A	The Balancing Authority failed to plan to meet Interchange Schedules and Ramps.
TOP-002-2a	R10.	Each Balancing Authority and Transmission Operator shall plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).	N/A	N/A	N/A	The responsible entity failed to plan to meet all System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs).
TOP-002-2a	R12.	The Transmission Service Provider shall include known SOLs or IROLs within its area and neighboring areas in the determination of transfer capabilities, in accordance with filed tariffs and/or regional Total Transfer Capability and Available Transfer Capability calculation processes.	N/A	N/A	N/A	The Transmission Service Provider failed to include known SOLs or IROLs within its area and neighboring areas in the determination of transfer capabilities, in accordance with filed tariffs and/or regional Total Transfer Capability and Available Transfer Capability calculation processes.
TOP-002-2a	R13.	At the request of the Balancing Authority or Transmission Operator, a Generator Operator	N/A	N/A	N/A	The Generator Operator failed to perform generating real and reactive capability

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		shall perform generating real and reactive capability verification that shall include, among other variables, weather, ambient air and water conditions, and fuel quality and quantity, and provide the results to the Balancing Authority or Transmission Operator operating personnel as requested.				verification that included, among other variables, weather, ambient air and water conditions, and fuel quality and quantity, or failed to provide the results of generating real and reactive verifications Balancing Authority or Transmission Operator operating personnel, when requested.
TOP-002-2a	R14.	Generator Operators shall, without any intentional time delay, notify their Balancing Authority and Transmission Operator of changes in capabilities and characteristics including but not limited to:	N/A	N/A	N/A	The Generator Operator failed to notify ~~their~~its Balancing Authority ~~and~~or Transmission Operator of changes in capabilities and characteristics including real output capabilities.
TOP-002-2a	R14.1.	Changes in real output capabilities.	N/A	N/A	N/A	~~The Generator Operator failed to notify its Balancing Authority or Transmission Operator of changes in real output capabilities.~~N/A
TOP-002-2a	R14.2.	Automatic Voltage	-N/A	-N/A	-N/A	-N/A

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Regulator status and mode setting. (Retired August 1, 2007)				
TOP-002-2a	R15.	Generation Operators shall, at the request of the Balancing Authority or Transmission Operator, provide a forecast of expected real power output to assist in operations planning (e.g., a seven-day forecast of real output).	N/A	N/A	N/A	The ~~Generation~~Generator Operator failed to provide, at the request of the Balancing Authority or Transmission Operator, a forecast of expected real power output to assist in operations planning (e.g., a seven-day forecast of real output).
TOP-002-2a	R18.	Neighboring Balancing Authorities, Transmission Operators, Generator Operators, Transmission Service Providers, and Load-Serving Entities shall use uniform line identifiers when referring to transmission facilities of an interconnected network.	N/A	N/A	N/A	The responsible entity failed to use uniform line identifiers when referring to transmission facilities of an interconnected network.
TOP-002-2a	R19.	Each Balancing Authority and Transmission Operator shall maintain accurate	N/A	N/A	N/A	The responsible entity failed to maintain accurate computer models utilized for

Violation Severity Level Matrix (TOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		computer models utilized for analyzing and planning system operations.				analyzing and planning system operations.
TOP-003-0	R1.	Generator Operators and Transmission Operators shall provide planned outage information.	-N/A	-N/A	-N/A	-N/A
TOP-003-0	R1.1.	Each Generator Operator shall provide outage information daily to its Transmission Operator for scheduled generator outages planned for the next day (any foreseen outage of a generator greater than 50 MW). The Transmission Operator shall establish the outage reporting requirements.	N/A	N/A	N/A	The Generator Operator failed to provide outage information, in accordance with its Transmission ~~Operators~~Operator's established outage reporting requirements, to its Transmission Operator for scheduled generator outages planned for the next day (any foreseen outage of a generator greater than 50 MW). OR The Transmission Operator failed to establish the outage reporting requirements.
TOP-003-0	R1.2.	Each Transmission Operator shall provide outage information	N/A	N/A	N/A	The Transmission Operator failed to provide outage

Violation Severity Level Matrix (TOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		daily to its Reliability Coordinator, and to affected Balancing Authorities and Transmission Operators for scheduled generator and bulk transmission outages planned for the next day (any foreseen outage of a transmission line or transformer greater than 100 kV or generator greater than 50 MW) that may collectively cause or contribute to an SOL or IROL violation or a regional operating area limitation. The Reliability Coordinator shall establish the outage reporting requirements.				information, in accordance with its Reliability Coordinators established outage reporting requirement, to its Reliability Coordinator, and to affected Balancing Authorities and Transmission Operators for scheduled generator and bulk transmission outages planned for the next day (any foreseen outage of a transmission line or transformer greater than 100 kV or generator greater than 50 MW) that may collectively cause or contribute to an SOL or IROL violation or a regional operating area limitation. OR The Reliability Coordinator failed to establish the outage reporting requirements.
TOP-003-0	R1.3.	Such information shall be available by 1200	~~N/A~~The responsible entity failed to	~~N/A~~The responsible entity failed to	~~N/A~~The responsible entity failed to	The responsible entity failed to provide the

Violation Severity Level Matrix (TOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Central Standard Time for the Eastern Interconnection and 1200 Pacific Standard Time for the Western Interconnection.	provide the information by 1200 Central Standard Time for the Eastern Interconnection or 1200 Pacific Standard Time for the Western Interconnection but did provide the information by 1230 for the applicable interconnection.	provide the information by 1230 Central Standard Time for the Eastern Interconnection or 1230 Pacific Standard Time for the Western Interconnection but did provide the information by 1300 for the applicable interconnection.	provide the information by 1300 Central Standard Time for the Eastern Interconnection or 1300 Pacific Standard Time for the Western Interconnection but did provide the information by 1330 for the applicable interconnection.	information by ~~1200~~1330 Central Standard Time for the Eastern Interconnection ~~and 1200~~or 1330 Pacific Standard Time for the Western Interconnection.
TOP-003-0	R2.	Each Transmission Operator, Balancing Authority, and Generator Operator shall plan and coordinate scheduled outages of system voltage regulating equipment, such as automatic voltage regulators on generators, supplementary excitation control, synchronous condensers, shunt and series capacitors, reactors, etc., among affected Balancing Authorities and	N/A	N/A	N/A	The responsible entity failed to plan or coordinate scheduled outages of system voltage regulating equipment, such as automatic voltage regulators on generators, supplementary excitation control, synchronous condensers, shunt and series capacitors, reactors, etc., among affected Balancing Authorities and Transmission Operators when required.

Violation Severity Level Matrix (TOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Transmission Operators as required.				
TOP-003-0	R3.	Each Transmission Operator, Balancing Authority, and Generator Operator shall plan and coordinate scheduled outages of telemetering and control equipment and associated communication channels between the affected areas.	~~The responsible entity planned and coordinated scheduled outages of telemetering and control equipment and associated communication channels with its Reliability Coordinator, but failed to coordinate with affected neighboring Transmission Operators, Balancing Authorities, and Generator Operators.~~N/A	N/A	~~N/A~~The responsible entity planned scheduled outages of telemetering and control equipment and associated communication channels but failed to coordinate between the affected areas.	The responsible entity failed to plan and coordinate scheduled outages of telemetering and control equipment and associated communication channels between the affected areas.
TOP-003-0	R4.	Each Reliability Coordinator shall resolve any scheduling of potential reliability conflicts.	N/A	N/A	N/A	The Reliability Coordinator failed to resolve any scheduling of potential reliability conflicts.
TOP-004-2	R1.	Each Transmission Operator shall operate within the Interconnection Reliability Operating Limits (IROLs) and System Operating	N/A	N/A	~~The Transmission Operator operated within the Interconnection Reliability Operating Limits (IROLs), but failed~~	The Transmission Operator failed to operate within the Interconnection Reliability Operating Limits (IROLs) and System Operating

Violation Severity Level Matrix (TOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Limits (SOLs).			~~to operate within the System Operating Limits (SOLs).~~N/A	Limits (SOLs).
TOP-004-2	R2.	Each Transmission Operator shall operate so that instability, uncontrolled separation, or cascading outages will not occur as a result of the most severe single contingency.	N/A	N/A	N/A	The Transmission Operator failed to operate so that instability, uncontrolled separation, or cascading outages would not occur as a result of the most severe single contingency.
TOP-004-2	R3.	Each Transmission Operator shall operate to protect against instability, uncontrolled separation, or cascading outages resulting from multiple outages, as specified by its Reliability Coordinator.	N/A	N/A	N/A	The Transmission Operator failed to operate to protect against instability, uncontrolled separation, or cascading outages resulting from multiple outages, as specified by ~~its~~ Reliability Coordinator policy.
TOP-004-2	R4.	If a Transmission Operator enters an unknown operating state (i.e., any state for which valid operating limits have not been determined), it will be considered to be in an emergency and shall	~~The Transmission Operator entering an unknown operating state (i.e., any state for which valid operating limits have not been determined), failed to restore operations~~	~~The Transmission Operator entering an unknown operating state (i.e., any state for which valid operating limits have not been determined), failed to restore operations~~	~~The Transmission Operator entering an unknown operating state (i.e., any state for which valid operating limits have not been determined), failed to restore operations~~	The Transmission Operator ~~entering~~entered an unknown operating state (i.e., any state for which valid operating limits have not been determined), and failed to restore operations to

Violation Severity Level Matrix (TOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		restore operations to respect proven reliable power system limits within 30 minutes.	~~to respect proven reliable power system limits for more than 30 minutes but less than or equal to 35 minutes.~~N/A	~~to respect proven reliable power system limits for more than 35 minutes but less than or equal to 40 minutes.~~N/A	~~to respect proven reliable power system limits for more than 40 minutes but less than or equal to 45 minutes.~~N/A	respect proven reliable power system limits for more than ~~45~~30 minutes.
TOP-004-2	R5.	Each Transmission Operator shall make every effort to remain connected to the Interconnection. If the Transmission Operator determines that by remaining interconnected, it is in imminent danger of violating an IROL or SOL, the Transmission Operator may take such actions, as it deems necessary, to protect its area.	N/A	N/A	N/A	The Transmission Operator ~~does~~did not ~~have evidence that the actions taken~~make every effort to ~~protect its area, resulting in its disconnection from the~~ remain connected to the Interconnection~~, were necessary to prevent the~~ except when the Transmission Operator determined that by remaining interconnected, it was in imminent danger of violating an IROL or SOL.
TOP-004-2	R6.	Transmission Operators, individually and jointly with other Transmission Operators, shall develop, maintain, and implement formal policies and procedures to provide for	The Transmission Operator, individually and jointly with other Transmission Operators, developed, maintained, and implemented formal	The Transmission Operator, individually and jointly with other Transmission Operators, developed, maintained, and implemented formal	The Transmission Operator, individually and jointly with other Transmission Operators, developed, maintained, and implemented formal	The Transmission Operator, ~~individually and jointly with other Transmission Operators, developed, maintained~~failed to develop, maintain, and implemented formal policies and procedures

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		transmission reliability. These policies and procedures shall address the execution and coordination of activities that impact inter- and intra-Regional reliability, including:	policies and procedures to provide for transmission reliability, addressing the execution and coordination of activities that impact inter- and intra-Regional reliability, ~~including the elements listed in TOP-004-2 R6.1 through R6.4,~~ but failed to include ~~other Transmission Operators in the development~~information required by one of ~~said policies and procedures.~~the subrequirements R6.1 thru R6.4	policies and procedures to provide for transmission reliability, addressing the execution and coordination of activities that impact inter- and intra-Regional reliability, but failed to include ~~one~~ information required by 2 of the ~~elements listed in TOP-004-2~~subrequirements R6.1 ~~through~~ thru R6.4.	policies and procedures to provide for transmission reliability, addressing the execution and coordination of activities that impact inter- and intra-Regional reliability, but failed to include ~~two~~information required by 3 ~~-~~of the ~~elements listed in TOP-004-2~~subrequirements R6.1 ~~through~~ thru R6.4.	to provide for transmission reliability, addressing the execution and coordination of activities that impact inter- and intra-Regional reliability~~, but~~ . If formal policies and procedures were developed, such policies and procedures failed to include ~~three or more~~any of the ~~elements listed~~information required in ~~TOP-004-2~~subrequirements R6.1 ~~through~~ thru R6.4.
TOP-004-2	R6.1.	Monitoring and controlling voltage levels and real and reactive power flows.	N/A	N/A	N/A	~~The Transmission Operator failed to include monitoring and controlling voltage levels and real and reactive power flows in the development, maintenance, and implementation of formal policies and procedures to provide~~

Violation Severity Level Matrix (TOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						~~for transmission reliability as described in TOP-004-2 R6.~~N/A
TOP-004-2	R6.2.	Switching transmission elements.	N/A	N/A	N/A	~~The Transmission Operator failed to include switching transmission elements in the development, maintenance, and implementation of formal policies and procedures to provide for transmission reliability as described in TOP-004-2 R6.~~N/A
TOP-004-2	R6.3.	Planned outages of transmission elements.	N/A	N/A	N/A	~~The Transmission Operator failed to include planned outages of transmission elements in the development, maintenance, and implementation of formal policies and procedures to provide for transmission reliability as described in TOP-004-2 R6.~~N/A
TOP-004-2	R6.4.	Responding to IROL and SOL violations.	N/A	N/A	N/A	~~The Transmission Operator failed to include responding to IROL and SOL violations in the development,~~

Violation Severity Level Matrix (TOP)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						~~maintenance, and implementation of formal policies and procedures to provide for transmission reliability as described in TOP-004-2 R6.~~N/A
TOP-005-1.1	R2.	As a condition of receiving data from the Interregional Security Network (ISN), each ISN data recipient shall sign the NERC Confidentiality Agreement for "Electric System Reliability Data."	N/A	N/A	N/A	The ISN data recipient failed to sign the NERC Confidentiality Agreement for "Electric System Reliability Data".
TOP-006-1	R1.	Each Transmission Operator and Balancing Authority shall know the status of all generation and transmission resources available for use.	N/A	N/A	N/A	The responsible entity failed to know the status of all generation and transmission resources available for use, even though said information was reported by the Generator Operator, Transmission Operator, or Balancing Authority.
TOP-006-1	R1.1.	Each Generator Operator shall inform its Host Balancing Authority and the Transmission Operator of all generation	N/A	N/A	N/A	The Generator Operator failed to inform its Host Balancing Authority and the Transmission Operator of all

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		resources available for use.				generation resources available for use.
TOP-006-1	R1.2.	Each Transmission Operator and Balancing Authority shall inform the Reliability Coordinator and other affected Balancing Authorities and Transmission Operators of all generation and transmission resources available for use.	N/A	N/A	N/A	The responsible entity failed to inform the Reliability Coordinator and other affected Balancing Authorities and Transmission Operators of all generation and transmission resources available for use.
TOP-006-1	R3.	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall provide appropriate technical information concerning protective relays to their operating personnel.	The responsible entity failed to provide ~~any~~5% or less of the appropriate technical information concerning protective relays to ~~their~~its operating personnel.	~~N/A~~The responsible entity failed to provide more than 5% up to (and including) 10% of the appropriate technical information concerning protective relays to its operating personnel.	~~N/A~~The responsible entity failed to provide more than 10% up to (and including) 15% of the appropriate technical information concerning protective relays to its operating personnel.	The responsible entity failed to provide ~~all~~more than 15% of the appropriate technical information concerning protective relays to ~~their~~its operating personnel.
TOP-006-1	R6.	Each Balancing Authority and Transmission Operator shall use sufficient metering of suitable range, accuracy and sampling rate (if applicable) to ensure	N/A	N/A	N/A	The responsible entity failed to use sufficient metering of suitable range, accuracy and sampling rate (if applicable) to ensure accurate and timely monitoring of operating

Violation Severity Level Matrix (TOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		accurate and timely monitoring of operating conditions under both normal and emergency situations.				conditions under both normal and emergency situations.
TOP-006-1	R7.	Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall monitor system frequency.	N/A	N/A	N/A	The responsible entity failed to monitor system frequency.
TOP-007-0	R1.	A Transmission Operator shall inform its Reliability Coordinator when an IROL or SOL has been exceeded and the actions being taken to return the system to within limits.	N/A	N/A	The Transmission Operator informed its Reliability Coordinator when an IROL or SOL had been exceeded but failed to provide the actions being taken to return the system to within limits.	The Transmission Operator failed to inform its Reliability Coordinator when an IROL or SOL had been exceeded.
TOP-007-0	R2.	Following a Contingency or other event that results in an IROL violation, the Transmission Operator shall return its transmission system to within IROL as soon as possible, but not longer than 30 minutes.	Following a Contingency or other event that resulted in an IROL violation of a magnitude ~~up to and including~~of 5~~%~~% or less, the Transmission Operator failed to return its transmission system	Following a Contingency or other event that resulted in an IROL violation, the Transmission Operator failed to return its transmission system to within the IROL in accordance with the following:	Following a Contingency or other event that resulted in an IROL violation, the Transmission Operator failed to return its transmission system to within the IROL in accordance with the following:	Following a Contingency or other event that resulted in an IROL violation, the Transmission Operator failed to return its transmission system to within the IROL in accordance with the following: (a) an IROL with a magnitude ~~greater~~of

Violation Severity Level Matrix (TOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			to within the IROL in less than or equal to 35 minutes.	(a) an IROL with a magnitude ~~up to and including~~ of 5% or less for a period of time greater than 35 minutes but less than or equal to 45 minutes, or (b) an IROL with a magnitude ~~greater~~of more than 5% ~~but less than or equal to~~up to (and including) 10% for a period of time less than or equal to 40 minutes, or (c) an IROL with a magnitude ~~greater~~of more than 10% ~~but less than or equal to~~up to (and including) 15% for a period of time less than or equal to 35 minutes.	(a) an IROL with a magnitude ~~up to and including~~ of 5% or less for a period of time greater than 45 minutes, or (b) an IROL with a magnitude ~~greater~~ of more than 5% ~~but less than or equal to~~ up to (and including) 10% for a period of time greater than 40 minutes, or (c) an IROL with a magnitude ~~greater~~of more than 10% ~~but less than or equal to~~up to (and including) 15% for a period of time greater than 35 minutes but less than or equal to 45 minutes, or (d) an IROL with a magnitude ~~greater~~of more than 15% ~~but less than or equal to~~up to (and including) 20% for a period of time less than or equal to 40	more than 10% ~~but less than or equal~~up to (and including) 15% for a period of time greater than 45 minutes, or (b) an IROL with a magnitude ~~greater~~of more than 15% ~~but less than or equal~~ up to (and including) 20% for a period of time greater than 40 minutes, or (c) an IROL with a magnitude ~~greater~~of more than 20% ~~but less than or equal~~up to (and including) 25% for a period of time greater than 35 minutes, or (d) an IROL with a magnitude ~~greater~~of more than 25% for a period of greater than 30 minutes.

Violation Severity Level Matrix (TOP)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					minutes, or (e) an IROL with a magnitude ~~greater~~of more than 20% ~~but less than or equal to~~up to (and including) 25% for a period of time less than or equal to 35 minutes.	
TOP-008-1	R1.	The Transmission Operator experiencing or contributing to an IROL or SOL violation shall take immediate steps to relieve the condition, which may include shedding firm load.	N/A	N/A	N/A	The Transmission Operator experiencing or contributing to an IROL or SOL violation failed to take immediate steps to relieve the condition, which may have included shedding firm load.
TOP-008-1	R2.	Each Transmission Operator shall operate to prevent the likelihood that a disturbance, action, or inaction will result in an IROL or SOL violation in its area or another area of the Interconnection. In instances where there is a difference in derived operating limits, the Transmission Operator	N/A	~~The Transmission Operator operated to prevent the likelihood that a disturbance, action, or inaction would result in an IROL or SOL violation in its area or another area of the Interconnection but failed to operate the Bulk Electric System to the most~~	The Transmission Operator operated to prevent the likelihood that a disturbance, action, or inaction would result in an IROL or SOL violation in its area ~~but failed to operate to prevent the likelihood that a disturbance, action,~~ or ~~inaction would result in an IROL or~~	The Transmission Operator failed to operate to prevent the likelihood that a disturbance, action, or inaction would result in an IROL or SOL violation in its area or another area of the Interconnection.

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Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		shall always operate the Bulk Electric System to the most limiting parameter.		~~limiting parameter in instances where there was a difference in derived operating limits.~~N/A	~~SOL violation in~~ another area of the Interconnection but failed to operate the Bulk Electric System to the most limiting parameter in instances where there was a difference in derived operating limits.	
TOP-008-1	R3.	The Transmission Operator shall disconnect the affected facility if the overload on a transmission facility or abnormal voltage or reactive condition persists and equipment is endangered. In doing so, the Transmission Operator shall notify its Reliability Coordinator and all neighboring Transmission Operators impacted by the disconnection prior to switching, if time permits, otherwise, immediately thereafter.	N/A	~~The Transmission Operator disconnected the affected facility when the overload on a transmission facility or abnormal voltage or reactive condition persisted and equipment was endangered but failed to notify its Reliability Coordinator and all neighboring Transmission Operators impacted by the disconnection either prior to switching, if time permitted, otherwise, immediately~~	~~N/A~~The Transmission Operator disconnected the affected facility when the overload on a transmission facility or abnormal voltage or reactive condition persisted and equipment was endangered but failed to notify its Reliability Coordinator and all neighboring Transmission Operators impacted by the disconnection either prior to switching, if time permitted, otherwise,	The Transmission Operator failed to disconnect the affected facility when the overload on a transmission facility or abnormal voltage or reactive condition persisted and equipment was endangered.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				~~thereafter.~~N/A	immediately thereafter.	

Violation Severity Level Matrix (TPL)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
TPL-001-0.1	R2.	When system simulations indicate an inability of the systems to respond as prescribed in Reliability Standard TPL-001-0_R1, the Planning Authority and Transmission Planner shall each:	~~The responsible entity is non-compliant with 25% or less of the sub-components.~~N/A	~~The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components.~~ The responsible entity has failed to review the continuing need for previously identified facility additions through subsequent annual assessments. (R2.2)	~~The responsible entity is non-compliant with 50% or more but less than 75% of the sub-components.~~ The responsible entity provided documented evidence of corrective action plans in order to satisfy Category A planning requirements, but failed to include an implementation schedule with in-service dates (R2.1.1 and R2.1.2) OR The responsible entity failed to consider necessary lead times to implement its corrective action plan. (R2.1.3)	~~The responsible entity is non-compliant with 75% or more of the sub-components.~~ The responsible entity has failed to provide documented evidence of corrective action plans in order to satisfy Category A planning requirements. (R2.1)
TPL-001-0.1	R2.1.	Provide a written summary of its plans to achieve the required system performance as	N/A	N/A	N/A	~~The responsible entity has failed to provide documented evidence of corrective action~~

Violation Severity Level Matrix (TPL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		described above throughout the planning horizon.				~~plans in order to satisfy Category~~ N/A ~~planning requirements.~~
TPL-001-0.1	R2.1.1.	Including a schedule for implementation.	N/A	N/A	N/A	N/A ~~schedule for the responsible entity's corrective action plan does not exist.~~
TPL-001-0.1	R2.1.2.	Including a discussion of expected required in-service dates of facilities.	N/A	N/A	N/A	~~Anticipated in-service dates, for the responsible entity's corrective action plan do not exist.~~N/A
TPL-001-0.1	R2.1.3.	Consider lead times necessary to implement plans.	N/A	N/A	N/A	~~The responsible entity failed to consider necessary lead times to implement its corrective action plan.~~N/A
TPL-001-0.1	R2.2.	Review, in subsequent annual assessments, (where sufficient lead time exists), the continuing need for identified system facilities. Detailed implementation plans are not needed.	N/A	N/A	N/A	~~The responsible entity has failed to demonstrate the continuing need for previously identified facility additions through subsequent annual assessments.~~N/A
TPL-001-0.1	R3.	The Planning Authority and	N/A	The responsible entity documented	N/A	The responsible entity DID NOT

Violation Severity Level Matrix (TPL)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Transmission Planner shall each document the results of these reliability assessments and corrective plans and shall annually provide these to its respective NERC Regional Reliability Organization(s), as required by the Regional Reliability Organization.		the results of its reliability assessments and corrective plans but did not annually provide~~d~~ them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability Organization		document the results of its annual reliability assessments and corrective plans AND did not annually provide~~d~~ them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability Organization
TPL-002-0	R2.	When System simulations indicate an inability of the systems to respond as prescribed in Reliability Standard TPL-002-0_R1, the Planning Authority and Transmission Planner shall each:	~~The responsible entity is non-compliant with 25% or less of the sub-components.~~N/A	~~The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components.~~ The responsible entity has failed to review the continuing need for previously identified facility additions through subsequent annual assessments. (R2.2)	~~The responsible entity is non-compliant with 50% or more but less than 75% of the sub-components.~~ The responsible entity provided documented evidence of corrective action plans in order to satisfy Category B planning requirements, but failed to include a implementation schedule with in-service dates (R2.1.1 and R2.1.2)	~~The responsible entity is non-compliant with 75% or more of the sub-components.~~ The responsible entity has failed to provide documented evidence of corrective action plans in order to satisfy Category B planning requirements. (R2.1)

Violation Severity Level Matrix (TPL)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					OR The responsible entity failed to consider necessary lead times to implement its corrective action plan. (R2.1.3)	
TPL-002-0	R2.1.	Provide a written summary of its plans to achieve the required system performance as described above throughout the planning horizon:	N/A	N/A	N/A	~~The responsible entity has failed to provide documented evidence of corrective action plans in order to satisfy Category B planning requirements.~~N/A
TPL-002-0	R2.1.1.	Including a schedule for implementation.	N/A	N/A	N/A	N/A ~~schedule for the responsible entity's corrective action plan does not exist.~~
TPL-002-0	R2.1.2.	Including a discussion of expected required in-service dates of facilities.	N/A	N/A	N/A	~~Anticipated in-service dates, for the responsible entity's corrective action plan does not exist. This would reflect effective dates for pre-contingency operating procedures or in-service dates for proposed system changes.~~N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
TPL-002-0	R2.1.3.	Consider lead times necessary to implement plans.	N/A	N/A	N/A	~~The responsible entity failed to consider necessary lead times to implement its corrective action plan.~~N/A
TPL-002-0	R2.2.	Review, in subsequent annual assessments, (where sufficient lead time exists), the continuing need for identified system facilities. Detailed implementation plans are not needed.	N/A	N/A	N/A	~~The responsible entity has failed to demonstrate the continuing need for previously identified facility additions through sub-sequent annual assessments.~~N/A
TPL-002-0	R3.	The Planning Authority and Transmission Planner shall each document the results of its Reliability Assessments and corrective plans and shall annually provide the results to its respective Regional Reliability Organization(s), as required by the Regional Reliability Organization.	N/A	The responsible entity documented the results of its reliability assessments and corrective plans but did not annually provide~~d~~ them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability Organization.	N/A	The responsible entity DID NOT document the results of its annual reliability assessments and corrective plans AND did not annually provide~~d~~ them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability Organization.

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
TPL-003-0	R2.	When system simulations indicate an inability of the systems to respond as prescribed in Reliability Standard TPL-003-0_R1, the Planning Authority and Transmission Planner shall each:	~~The responsible entity is non-compliant with 25% or less of the sub-components.~~N/A	~~The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components.~~ The responsible entity has failed to review the continuing need for previously identified facility additions through subsequent annual assessments. (R2.2)	~~The responsible entity is non-compliant with 50% or more but less than 75% of the sub-components.~~ The responsible entity provided documented evidence of corrective action plans in order to satisfy Category C planning requirements, but failed to include an implementation schedule with in-service dates. (R2.1.1 and R2.1.2) OR The responsible entity failed to consider necessary lead times to implement its corrective action plan. (R2.1.3)	~~The responsible entity is non-compliant with 75% or more of the sub-components.~~ The responsible entity has failed to provide documented evidence of corrective action plans in order to satisfy Category C planning requirements. (R2.1)
TPL-003-0	R2.1.	Provide a written summary of its plans to achieve the required system performance as described above	N/A	N/A	N/A	~~The responsible entity has failed to provide documented evidence of corrective action plans in order to~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		throughout the planning horizon:				~~satisfy Category C planning requirements.~~N/A
TPL-003-0	R2.1.1.	Including a schedule for implementation.	N/A	N/A	N/A	N/A ~~schedule for the responsible entity's corrective action plan does not exist.~~
TPL-003-0	R2.1.2.	Including a discussion of expected required in-service dates of facilities.	N/A	N/A	N/A	~~Anticipated in-service dates, for the responsible entity's corrective action plan does not exist. This would reflect effective dates for pre-contingency operating procedures or in-service dates for proposed system changes.~~N/A
TPL-003-0	R2.1.3.	Consider lead times necessary to implement plans.	N/A	N/A	N/A	~~The responsible entity failed to consider necessary lead times to implement its corrective action plan.~~N/A
TPL-003-0	R2.2.	Review, in subsequent annual assessments, (where sufficient lead time exists), the continuing need for identified system	N/A	N/A	N/A	~~The responsible entity has failed to demonstrate the continuing need for previously identified facility additions through sub-sequent~~

Violation Severity Level Matrix (TPL)
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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		facilities. Detailed implementation plans are not needed.				~~annual assessments.~~N/A
TPL-003-0	R3.	The Planning Authority and Transmission Planner shall each document the results of these Reliability Assessments and corrective plans and shall annually provide these to its respective NERC Regional Reliability Organization(s), as required by the Regional Reliability Organization.	N/A	The responsible entity documented the results of its reliability assessments and corrective plans but did not annually provide~~d~~ them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability Organization.	N/A	The responsible entity DID NOT document the results of its annual reliability assessments and corrective plans AND did not annually provide~~d~~ them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability Organization.
TPL-004-0	R1.	The Planning Authority and Transmission Planner shall each demonstrate through a valid assessment that its portion of the interconnected transmission system is evaluated for the risks and consequences of a number of each of the extreme contingencies that	The responsible entity is non-compliant with ~~25% or less~~one of the sub-components~~.~~ of requirement R1.3 (R1.3.1 through R1.3.9). OR The responsible entity has considered the NERC Category D contingencies applicable to their system, but was	The responsible entity is non-compliant with ~~more than 25% but less than 50%~~two of the sub-components~~.~~ of requirement R1.3 (R1.3.1 through 1.3.9). OR The responsible entity has considered the NERC Category D contingencies applicable to their	The responsible entity is non-compliant with ~~50% or more but less than 75%~~three of the sub-components~~.~~ of requirement R1.3 (R1.3.1 through 1.3.9). OR The responsible entity has considered the NERC Category D contingencies applicable to their	The responsible entity did not perform the transmission assessments annually. (R1.1) OR The responsible entity has failed to demonstrate a valid assessment for the near-term planning period. (R1.2) OR

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		are listed under Category D of Table I. To be valid, the Planning Authority's and Transmission Planner's assessment shall:	deficient with respect to 5% or less of all applicable contingencies. (R1.4)	system, but was deficient with respect to more than 5% up to (and including) 10% of all applicable contingencies. (R1.4)	system, but was deficient with respect to more than 10% up to (and including) 15% of all applicable contingencies. (R1.4)	The responsible entity is non-compliant with ~~75%~~four or more of the sub-components~~.~~ of requirement R1.3 (R1.3.1 through 1.3.9). OR The responsible entity has considered the NERC Category D contingencies applicable to its system, but was deficient with respect to more than 15% of all applicable contingencies. (R1.4)
TPL-004-0	R1.1.	Be made annually.	N/A	N/A	N/A	~~The assessments were not made on an annual basis.~~ N/A
TPL-004-0	R1.2.	Be conducted for near-term (years one through five).	N/A	N/A	N/A	~~The responsible entity has failed to demonstrate a valid assessment for the near-term period.~~N/A
TPL-004-0	R1.3.	Be supported by a current or past study and/or system	~~The responsible entity is non-compliant with 25%~~	~~The responsible entity is non-compliant with more~~	~~The responsible entity is non-compliant with 50%~~	~~The responsible entity is non-compliant with 75%~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		simulation testing that addresses each of the following categories, showing system performance following Category D contingencies of Table I. The specific elements selected (from within each of the following categories) for inclusion in these studies and simulations shall be acceptable to the associated Regional Reliability Organization(s).	~~or less of the sub-components.~~N/A	~~than 25% but less than 50% of the sub-components.~~ N/A	~~or more but less than 75% of the sub-components.~~ N/A	~~or more of the sub-components.~~ N/A
TPL-004-0	R1.3.1.	Be performed and evaluated only for those Category D contingencies that would produce the more severe system results or impacts. The rationale for the contingencies selected for evaluation shall be available as supporting information. An explanation of why	N/A	~~The responsible entity provided evidence through current or past studies that selected NERC Category D contingencies were evaluated, however, no rational was provided to indicate why the remaining Category D contingencies for their system were not evaluated.~~ N/A	N/A	~~The responsible entity did not provided evidence through current or past studies to indicate that any NERC Category D contingencies were evaluated.~~N/A

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		the remaining simulations would produce less severe system results shall be available as supporting information.				
TPL-004-0	R1.3.2.	Cover critical system conditions and study years as deemed appropriate by the responsible entity.	N/A	N/A	N/A	~~The responsible entity has failed to cover critical system conditions and study years as deemed appropriate.~~N/A
TPL-004-0	R1.3.3.	Be conducted annually unless changes to system conditions do not warrant such analyses.	N/A	N/A	N/A	~~The responsible entity did not perform a near-term Category D study and/or system simulation test in the most recent annual period AND system changes (actual or proposed) indicate that past studies and/or system simulation testing are no longer valid~~N/A
TPL-004-0	R1.3.4.	Have all projected firm transfers modeled.	~~The system model(s) used for current or past analysis did not properly represent up to (but less than) 25% of the firm~~	~~The system model(s) used for current or past analysis did not properly represent 25% or more but less than 50% of the firm~~	~~The system model(s) used for current or past analysis did not properly represent 50% or more but less than 75% of the firm~~	~~The system model(s) used for current or past analysis did not properly represent 75% or more of the firm transfers~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			~~transfers to/from the responsible entity's service territory.~~N/A	~~transfers to/from the responsible entity's service territory.~~N/A	~~transfers to/from the responsible entity's service territory.~~N/A	~~to/from the responsible entity's service territory.~~N/A
TPL-004-0	R1.3.5.	Include existing and planned facilities.	~~The responsible entity's transmission model used for past or current studies and/or system simulation testing properly reflects existing facilities, but is deficient in reflecting planned facilities.~~N/A	~~The responsible entity's transmission model used for past or current studies and/or system simulation testing properly reflects planned facilities, but is deficient in reflecting existing facilities.~~N/A	N/A	~~The responsible entity's transmission model used for past or current studies and/or system simulation testing is deficient in reflecting existing AND planned facilities.~~N/A
TPL-004-0	R1.3.6.	Include Reactive Power resources to ensure that adequate reactive resources are available to meet system performance.	N/A	N/A	N/A	~~The responsible entity has failed to ensure in a past or current study and/or system simulation testing that sufficient reactive power resources are available to meet required system performance.~~N/A
TPL-004-0	R1.3.7.	Include the effects of existing and planned protection systems, including any backup or redundant systems.	N/A	N/A	~~The responsible entity's transmission model used for past or current studies is deficient with respect to the effects of planned protection systems, including any~~	~~The responsible entity's transmission model used for past or current studies is deficient with respect to the effects of existing protection systems, including any~~

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Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
					~~backup or redundant systems.~~N/A	~~backup or redundant systems.~~N/A
TPL-004-0	R1.3.8.	Include the effects of existing and planned control devices.	N/A	N/A	~~The responsible entity's transmission model used for past or current studies is deficient with respect to the effects of planned control devices.~~N/A	~~The responsible entity's transmission model used for past or current studies is deficient with respect to the effects of existing control devices.~~N/A
TPL-004-0	R1.3.9.	Include the planned (including maintenance) outage of any bulk electric equipment (including protection systems or their components) at those demand levels for which planned (including maintenance) outages are performed.	N/A	N/A	N/A	~~The responsible entity's transmission model used for past or current studies is deficient with respect to the inclusion of planned maintenance outages of bulk electric transmission facilities.~~N/A
TPL-004-0	R1.4.	Consider all contingencies applicable to Category D.	~~The responsible entity has considered the NERC Category D contingencies, but was deficient with respect to 25% or less of all applicable contingencies~~N/A	~~The responsible entity has considered the NERC Category D contingencies, but was deficient with respect to more than 25% but less than 50% of all applicable contingencies.~~N/A	~~The responsible entity has considered the NERC Category D contingencies, but was deficient with respect to more than 50% but less than 75% of all applicable contingencies.~~N/A	~~The responsible entity has considered the NERC Category D contingencies, but was deficient 75% or more of all applicable contingencies.~~N/A

Violation Severity Level Matrix (TPL)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
TPL-004-0	R2.	The Planning Authority and Transmission Planner shall each document the results of its reliability assessments and shall annually provide the results to its entities' respective NERC Regional Reliability Organization(s), as required by the Regional Reliability Organization.	N/A	The responsible entity documented the results of its reliability assessments but did not annually provide~~d~~ them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability Organization.	N/A	The responsible entity DID NOT document the results of its annual reliability assessments AND did not annually provide~~d~~ them to its respective NERC Regional Reliability Organization(s) as required by the Regional Reliability Organization.

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
VAR-001-1	R1.	Each Transmission Operator, individually and jointly with other Transmission Operators, shall ensure that formal policies and procedures are developed, maintained, and implemented for monitoring and controlling voltage levels and Mvar flows within their individual areas and with the areas of neighboring Transmission Operators.	~~The applicable entity did not ensure the development and/or maintenance and/or implementation of formal policies and procedures, as directed by the requirement, affecting 5% or less of their individual and neighboring areas voltage levels and Mvar flows.~~N/A	~~The applicable entity did not ensure the development and/or maintenance and/or implementation of formal policies and procedures, as directed by the requirement, affecting between 5-10% of their individual and neighboring areas voltage levels and Mvar flows.~~The Transmission Operator has formal policies and procedures for monitoring and controlling voltage and MVAR flows, but they are not current.	~~The applicable entity did not ensure the development and/or maintenance and/or implementation of formal policies and procedures, as directed by the requirement, affecting 10-15%, inclusive, of their individual and neighboring areas voltage levels and Mvar flows.~~The Transmission Operator has formal policies and procedures for monitoring and controlling voltage and MVAR flows that are current, but they have not been coordinated with one or more neighboring Transmission Operators.	~~The applicable entity did not ensure the development and/or maintenance and/or implementation of formal policies and procedures, as directed by the requirement, affecting greater than 15% of their individual and neighboring areas voltage levels and Mvar flows.~~The Transmission Operator has formal policies and procedures for monitoring and controlling voltage and MVAR flows, but has not implemented them. OR The Transmission Operator does not have formal policies and procedures for monitoring and controlling voltage and MVAR flows.
VAR-001-1	R3.	The Transmission	N/A	N/A	N/A	The Transmission

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Operator shall specify criteria that exempts generators from compliance with the requirements defined in Requirement 4, and Requirement 6.1.				Operator did not specify criteria that ~~exempts~~exempted generators from compliance with the requirements defined in Requirement R4, and Requirement R6.1. ~~to all of the parties involved.~~
VAR-001-1	R6.1.	When notified of the loss of an automatic voltage regulator control, the Transmission Operator shall direct the Generator Operator to maintain or change either its voltage schedule or its Reactive Power schedule.	N/A	N/A	N/A	The Transmission Operator has not provided evidence to show that directives were issued to the Generator Operator to maintain or change either its voltage schedule or its Reactive Power schedule in accordance with R6.1.
VAR-001-1	R11.	After consultation with the Generator Owner regarding necessary step-up transformer tap changes, the Transmission Operator shall provide documentation to the Generator Owner	~~The Transmission Operator provided documentation to the Generator Owner specifying required step-up transformer tap changes and a timeframe for making these changes, but failed to provide technical~~	The Transmission Operator provided documentation to the Generator Owner specifying required step-up transformer tap changes~~, but failed to provide~~ and a timeframe for making these changes~~ and~~, but	The Transmission Operator ~~failed to provide~~ provided documentation to the Generator Owner specifying required step-up transformer tap changes, but failed to provide a timeframe for making these	~~N/A~~The Transmission Operator failed to provide documentation to the Generator Owner specifying required step-up transformer tap changes, a timeframe for making these

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		specifying the required tap changes, a timeframe for making the changes, and technical justification for these changes.	~~justification for these changes.~~N/A	failed to provide technical justification for these changes.	changes~~,~~ and technical justification for these changes.	changes, and technical justification for these changes.
VAR-001-1	R12.	The Transmission Operator shall direct corrective action, including load reduction, necessary to prevent voltage collapse when reactive resources are insufficient.	N/A	N/A	N/A	The Transmission Operator has failed to direct corrective action, including load reduction, necessary to prevent voltage collapse when reactive resources are insufficient.
VAR-002-1.1a	R1.	The Generator Operator shall operate each generator connected to the interconnected transmission system in the automatic voltage control mode (automatic voltage regulator in service and controlling voltage) unless the Generator Operator has notified the Transmission Operator.	N/A~~The Generator Operator failed to notify the Transmission Operator as identified in R1 for less than 25% of its generators.~~	N/A~~The Generator Operator failed to notify the Transmission Operator as identified in R1 for 25% or more but less tan 50% of its generators.~~	N/A~~The Generator Operator failed to notify the Transmission Operator as identified in R1 for 50% or more but less tan 75% of its generators.~~	~~The Generator Operator~~The responsible entity did not operate each generator in the automatic voltage control mode and failed to notify the Transmission Operator as identified in R1~~ for 75% or more of its generators~~.

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
VAR-002-1.1a	R2.	Unless exempted by the Transmission Operator, each Generator Operator shall maintain the generator voltage or Reactive Power output (within applicable Facility Ratings. [1] as directed by the Transmission Operator	~~The Generator Operator failed to maintain a voltage or reactive power schedule for less than 25% of its generators.~~When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator Operator failed to meet the directed values by 5% or less.	~~The Generator Operator failed to maintain a voltage or reactive power schedule for 25% or more but less tan 50% of its generators.~~When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator Operator failed to meet the directed values by more than 5% up to (and including) 10% OR When a generator's automatic voltage regulator is out of service, the Generator Operator failed to use an alternative method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule directed by the Transmission	~~The Generator Operator failed to maintain a voltage or reactive power schedule for 50% or more but less tan 75% of its generators.~~When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator Operator failed to meet the directed values by more than 10% up to (and including) 15%	~~The Generator Operator failed to maintain a voltage or reactive power schedule for 75% or more of its generators.~~When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator Operator failed to meet the directed values by more than 15%. OR When a generator's automatic voltage regulator is out of service, the Generator Operator failed to use an alternative method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule directed by the Transmission Operator and the Generator Operator failed to provide an

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				Operator. OR The Generator Operator failed to provide an explanation of why the voltage schedule could not be met.		explanation of why the voltage schedule could not be met.
VAR-002-1.1a	R2.1.	When a generator's automatic voltage regulator is out of service, the Generator Operator shall use an alternative method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule directed by the Transmission Operator.	~~The Generator Operator failed to use an alternate method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule for less than 25% of its generators.~~N/A	~~The Generator Operator failed to use an alternate method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule for 25% or more but less tan 50% of its generators.~~N/A	~~The Generator Operator failed to use an alternate method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule for 50% or more but less tan 75% of its generators.~~N/A	~~The Generator Operator to use an alternate method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule for 75% or more of its generators.~~N/A
VAR-002-1.1a	R2.2.	When directed to modify voltage, the Generator Operator shall comply or provide an explanation of why the schedule cannot be met.	~~The Generator Operator failed to comply with required voltage modifications or provide an explanation of why the modifications could not be met less the 25% of the time.~~N/A	~~The Generator Operator failed to comply with required voltage modifications or provide an explanation of why the modifications could not be met less than 50% of the time but more than or~~	~~The Generator Operator failed to comply with required voltage modifications or provide an explanation of why the modifications could not be met less than 75% of the time but more than or~~	~~The Generator Operator failed to comply with required voltage modifications or provide an explanation of why the modifications could not be met more than 75% of the time.~~N/A

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
				~~equal to 25% of the time.~~N/A	~~equal to 50% of the time.~~N/A	
VAR-002-1.1a	R3.	Each Generator Operator shall notify its associated Transmission Operator as soon as practical, but within 30 minutes of any of the following:	~~The Generator Operator had one incident of failing to notify the Transmission Operator as identified in R3.~~N/A	~~The Generator Operator had more than one but less than five incidents of failing to notify the Transmission as identified in R3.1 R3.2.~~ N/A	The Generator Operator ~~had more than five but less than ten incidents of failing~~failed to notify the Transmission Operator within 30 minutes of the information as ~~identified~~specified in either R3.1 or R3.2	The Generator Operator ~~had ten or more incidents of failing~~failed to notify the Transmission Operator within 30 minutes of the information as ~~identified~~specified in both R3.1 and R3.2~~.~~
VAR-002-1.1a	R3.1.	A status or capability change on any generator Reactive Power resource, including the status of each automatic voltage regulator and power system stabilizer and the expected duration of the change in status or capability.	N/A	N/A	N/A	~~The Generator Operator failed to notify the Transmission Operator of a status or capability change on any generator Reactive Power resource, including the status of each automatic voltage regulator and power system stabilizer and the expected duration of the change in status or capability.~~N/A
VAR-002-1.1a	R3.2.	A status or capability change on any other Reactive	N/A	N/A	N/A	~~The Generator Operator failed to notify the~~

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Power resources under the Generator Operator's control and the expected duration of the change in status or capability.				~~Transmission Operator of a status or capability change on any other Reactive Power resources under the Generator Operator's control and the expected duration of the change in status or capability.~~N/A
VAR-002-1.1a	R4.	The Generator Owner shall provide the following to its associated Transmission Operator and Transmission Planner within 30 calendar days of a request.	The ~~Generator Owner had one (1) incident of failing~~Responsible entity failed to ~~notify~~ provide to its associated Transmission Operator and Transmission Planner ~~within 30 calendar days of a request for information,~~one of the types of data as ~~described~~specified in R4.1.1 ~~through R~~or R 4.1.2 or 4.1.~~4, regarding generator step-up transformers and auxiliary transformers with primary voltages~~	The ~~Generator Owner had more than one (1) incident but less than five (5) incidents of failing~~Responsible entity failed to ~~notify~~ provide to its associated Transmission Operator and Transmission Planner ~~within 30 calendar days of a request for information,~~two of the types of data as ~~described~~specified in R4.1.1 ~~through R~~or R 4.1.2 or 4.1.~~4, regarding generator step-up transformers and auxiliary~~	The ~~Generator Owner had more than five (5) incidents but less than ten (10) incidents of failing~~Responsible entity failed to ~~notify~~ provide to its associated Transmission Operator and Transmission Planner ~~within 30 calendar days of a request for information,~~three of the types of data as ~~described~~specified in R4.1.1 ~~through R~~or R 4.1.~~4, regarding generator step-up transformers and~~	The ~~Generator Owner had more than ten (10) incidents of failing~~Responsible entity failed to ~~notify~~ provide to its associated Transmission Operator and Transmission Planner ~~within 30 calendar days of a request for information,~~any of the types of data as ~~described~~specified in R4.1.1 ~~through R~~and R 4.1.~~4, regarding generator step-up transformers and auxiliary transformers with~~

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
			~~equal to or greater than the generator terminal voltage.~~3 or 4.1.4 OR The information was provided in more than 30, but less than or equal to 35 calendar days of the request.	~~transformers with primary voltages equal to or greater than the generator terminal voltage.~~3 or 4.1.4 OR The information was provided in more than 35, but less than or equal to 40 calendar days of the request.	~~auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage.~~2 or 4.1.3 or 4.1.4 OR The information was provided in more than 40, but less than or equal to 45 calendar days of the request.	~~primary voltages equal to or greater than the generator terminal voltage.~~2 and 4.1.3 and 4.1.4 OR The information was provided in more than 45 calendar days of the request.
VAR-002-1.1a	R4.1.	For generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage:	N/A	N/A	N/A	~~The Generator Owner failed to notify its associated Transmission Operator and Transmission Planner within 30 calendar days of a request for information, as described in R4.1.1 through R4.1.4, regarding generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage.~~N/A

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
VAR-002-1.1a	R4.1.1.	Tap settings.	N/A	N/A	N/A	~~The Generator Owner failed to notify its associated Transmission Operator and Transmission Planner within 30 calendar days of a request for tap settings on generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage.~~N/A
VAR-002-1.1a	R4.1.2.	Available fixed tap ranges.	N/A	N/A	N/A	~~The Generator Owner failed to notify its associated Transmission Operator and Transmission Planner within 30 calendar days of a request for available fixed tap ranges on generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator~~

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						~~terminal voltage.~~N/A
VAR-002-1.1a	R4.1.3.	Impedance data.	N/A	N/A	N/A	~~The Generator Owner failed to notify its associated Transmission Operator and Transmission Planner within 30 calendar days of a request for impedance data on generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage.~~N/A
VAR-002-1.1a	R4.1.4.	The +/- voltage range with step-change in % for load-tap changing transformers.	N/A	N/A	N/A	~~The Generator Owner failed to notify its associated Transmission Operator and Transmission Planner within 30 calendar days of a request for the +/- voltage range with tap change in percent (%) for load-tap changing transformers on generator step-up~~

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
						~~transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage.~~N/A
VAR-002-1.1a	R5.	After consultation with the Transmission Operator regarding necessary step-up transformer tap changes, the Generator Owner shall ensure that transformer tap positions are changed according to the specifications provided by the Transmission Operator, unless such action would violate safety, an equipment rating, a regulatory requirement, or a statutory requirement.	~~The Generator Owner had one (1) incident of failing to change the step-up transformer tap settings in accordance with the specifications provided by the Transmission Operator when said actions would not have violated safety, an equipment rating, a regulatory requirement, or a statutory requirement.~~ N/A	~~The Generator Owner had more than one (1) incident but less than or equal to five (5) incidents of failing to change the step-up transformer tap settings in accordance with the specifications provided by the Transmission Operator when said actions would not have violated safety, an equipment rating, a regulatory requirement, or a statutory requirement.~~ N/A	~~The Generator Owner had more than five (5) incident but less than or equal to ten (10) incidents of failing to change the step-up transformer tap settings in accordance with the specifications provided by the Transmission Operator when said actions would not have violated safety, an equipment rating, a regulatory requirement, or a statutory requirement.~~ N/A	The ~~Generator Owner had more than ten (10) incidents of failing~~responsible entity failed to ~~change the step-up~~ensure that transformer tap ~~settings in accordance with~~positions were changed according to the specifications provided by the Transmission Operator when said actions would not have violated safety, an equipment rating, a regulatory requirement, or a statutory requirement.
VAR-002-1.1a	R5.1.	If the Generator Operator can't comply with the	~~The Generator Operator had one (1) incident of failing to~~	~~The Generator Operator had more than one (1) incident~~	~~The Generator Operator had more than five (5) incident~~	The ~~Generator Operator had more than ten (10)~~

Violation Severity Level Matrix (VAR)
Encompassing Commission-Approved Reliability Standards

Standard Number	Requirement Number	Text of Requirement	Lower VSL	Moderate VSL	High VSL	Severe VSL
		Transmission Operator's specifications, the Generator Operator shall notify the Transmission Operator and shall provide the technical justification.	~~notify and provide technical justification to the Transmission Operator concerning non-compliance with Transmission Operator's specifications.~~ N/A	~~but less than or equal to five (5) incidents of failing to notify and provide technical justification to the Transmission Operator concerning non-compliance with Transmission Operator's specifications.~~ N/A	~~but less than or equal to ten (10) incidents of failing to notify and provide technical justification to the Transmission Operator concerning non-compliance with Transmission Operator's specifications.~~ N/A	~~incidents of failing~~responsible entity failed to notify the Transmission Operator and to provide technical justification ~~to the Transmission Operator concerning non-compliance with Transmission Operator's specifications.~~ .

Exhibit C — Guideline 2b-4 VSL Review and Findings

BAL-001 - 0.1a R#	Explanation of Changes	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 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	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R1.	*No changes.*	See Guideline 1 Report.	The requirement has gradated VSLs; therefore, Guideline 2a is not applicable, and no changes to the VSLs were required for consistency with the guideline. NERC reviewed the VSL text and determined that, as written, the VSL text is clear, specific and objective and it does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective	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.	The VSL assignments comply with Guideline 4, because the requirement expressly provides that a violation of the Reliability Standard is based on a measurement of performance over a period of time.

			application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for consistency with FERC Guideline 2.		
R2.	*No changes.*	See Guideline 1 Report	The requirement has gradated VSLs; therefore, Guideline 2a is not applicable and no changes to the VSLs were required for consistency with the guideline. 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. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for consistency with FERC Guideline 2.	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.	The VSL assignments comply with Guideline 4, because the requirement expressly provides that a violation of the Reliability Standard is based on a measurement of performance over a period of time.
R3.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The	NERC compared the existing VSLs to the stated requirement	The VSL assignments comply with Guideline 4,

			requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. NERC reviewed the VSL text and determined that, as written, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for consistency with FERC Guideline 2.	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.	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.

BAL-002-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2 and NERC's August 11, 2009 informational filing submitted to FERC. Specifically, the former binary VSL was removed, and a High VSL was added to address the condition where the Contingency Reserves were available, but were not operated. Under the High VSL, NERC deleted "N/A" and inserted "The Balancing Authority did not operate Contingency Reserve to respond to a Disturbance." Under the Severe VSL, deleted "does" and inserted "did." Deleted "and/or operate" and "Disturbances." Inserted "a Disturbance."	See Guideline 1 Analysis.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. A prior use of a binary VSL was removed to provide a level of gradation. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the revised 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.	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.
R1.1.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment	NERC compared the existing VSLs to the stated requirement language to	The VSL assignments comply with Guideline 4, because they are based on a single violation

			at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for consistency with FERC Guideline 2.	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.	of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.
Revised R3.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Also, consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, deleted "Average Percent Recovery" and	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. NERC has reviewed the VSL text and has determined that, with the correction of typographical errors, stylistic	NERC compared the revised 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.	The VSL assignments comply with Guideline 4, because they expressly provide that a violation of the Reliability Standard is based on a measurement of performance over a period of time.

	inserted “average percent recovery,” and inserted “OR The Balancing Authority or Reserve Sharing Group failed to review its probable contingencies to determine its prospective most severe single contingencies annually as specified in R3.1.” Under Moderate VSL, deleted “Average Percent Recovery” and inserted “average percent recovery.” Under High VSL, deleted “Average Percent Recovery” and inserted “average percent recovery.” Under Severe VSL, deleted “Average Percent Recovery” and inserted “average percent recovery,” and inserted “OR The Balancing Authority or Reserve Sharing Group failed to carry at least enough Contingency Reserve to cover the most severe single contingency as specified in R3.1.”		edits or format changes, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R3.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC’s August 11, 2009 informational filing with FERC, for the purposes of clarity.		

Revised R4.1.	No VSL was assigned to this requirement on the basis that it is actually an exemption from the standard. As such, the original VSL does not align with the requirement. Based on the language in the VSL, the requirement is not measureable, and therefore does not require a VSL. Under Severe VSL, deleted "The Balancing Authority failed to return its ACE to zero if its ACE just prior to the Reportable Disturbance was positive or equal to zero or for negative initial ACE values failed to return ACE to its pre-Disturbance value," and inserted "NA."				
Revised R4.2.	No VSL was assigned to this requirement on the basis that it is actually an exemption from the standard. As such, the original VSL does not align with the requirement. Based on the language in the VSL, the requirement is not measureable, and therefore does not require a VSL.				
Revised R5.1.	No VSL was assigned to this requirement on the basis that it is actually an exemption from the standard. As such, the original VSL does not align with the requirement. Based on the language in the VSL, the requirement is not measureable, and therefore does not require a VSL.				

Revised R5.2.	No VSL was assigned this requirement on the basis that it is actually an exemption from the standard. As such, the original VSL does not align with the requirement. Based on the language in the VSL, the requirement is not measureable, and therefore does not require a VSL.				
Revised R6.	The VSLs were modified for clarity and consistency with other standards and VSLs, consistent with Guideline 2 and NERC's August 11, 2009 informational filing submitted to FERC. Under the Lower VSL, deleted "restored" and inserted "failed to restore 5% or," and deleted, "than 100% but greater than 90%." Under moderate VSL, deleted "restored less" and inserted, "failed to restore more," and deleted, "or equal to 90% but greater than 80%," and inserted, "5% up to (and including) 10%." Under High VSL, deleted "restored less" and inserted, "failed to restore more," and deleted, "or equal to 80% but greater than or equal" and inserted "10% up" and deleted, "70%" and inserted "(and	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. 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. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the	NERC compared the revised 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.	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.

	including) 15%." Under Severe VSL, deleted "restored less" and inserted, "failed to restore more," and deleted, "70" and inserted "15."		determination of penalties by the Compliance Enforcement Authority.		
Revised R6.1.	No VSLs were assigned to this requirement on the basis that it is actually an exemption from the standard. As such, the original VSL does not align with the requirement. Based on the language in the VSL, the requirement is not measureable, and therefore does not require a VSL.				
Revised R6.2.	No VSLs were assigned to this requirement on the basis that it is actually an exemption from the standard. As such, the original VSL does not align with the requirement. Based on the language in the VSL, the requirement is not measureable, and therefore does not require a VSL.				

BAL-003-0.1b R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified for clarity. Consistent with Guideline 2 and NERC's Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL, so that compliance is based on meeting criteria specified in former components. Under the Lower VSL, deleted "N/A" and inserted, "The Balancing Authority failed to report the method for determining its Frequency Bias Setting to the NERC Operating Committee." Under Moderate VSL, deleted "N/A" and inserted "The Balancing Authority failed to report its Frequency Bias Setting to the NERC Operating Committee." Under High VSL, deleted "The Balancing Authority reviewed its Frequency Bias Settings prior January 1, but failed to recalculate its setting to reflect any change in the Frequency Response of the Balancing Authority Area" and inserted,	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the revised 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.	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.

	"The Balancing Authority failed to report its Frequency Bias Setting and the method for determining that Frequency Bias Setting to the NERC Operating Committee as required in R1.2." Under Severe VSL, deleted "prior to" and inserted "by" and deleted "," and inserted, "of each year" and deleted "failed to."				
Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, for the purposes of clarity.		
Revised R1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, for the purposes of clarity.		
R3.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed	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.	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.

			to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for consistency with FERC Guideline 2.		
Revised R4.	The VSLs were modified for clarity, in accordance with Guideline 2 and the NERC Guidelines filed with FERC on August 11, 2009. Under Severe VSL, deleted "its" and inserted "their."	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the revised 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.	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.
R4.1.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other	NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability	The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on

			single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	a cumulative number of violations of the same requirement over a period of time.
Revised R4.2.	The VSLs were modified for clarity, in accordance with Guideline 2 and the NERC Guidelines filed with FERC on August 11, 2009. Under the Severe VSL, deleted "The" and inserted, "A." Deleted "Authorities" and inserted, "Authority." Deleted "have" and inserted, "has." Deleted "do" and inserted "does." Deleted "their" and inserted "its."	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of	NERC compared the revised 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.	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.

			the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
R5.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for consistency with FERC Guideline 2.	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.	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.
R5.1.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level.	NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine	The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability

			This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for consistency with FERC Guideline 2.	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.	Standard and are not based on a cumulative number of violations of the same requirement over a period of time.

BAL-004-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R2.	The VSLs were modified for clarity, in accordance with Guideline 2 and the NERC Guidelines filed with FERC on August 11, 2009. Under Severe VSL, deleted "RC" and inserted "responsible entity."	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. NERC has	NERC compared the revised 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	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.

			reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	with the requirement and the degree of compliance can be determined objectively and with certainty.	
Revised R4.1.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the	NERC compared the revised 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.	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.

			determination of penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for consistency with FERC Guideline 2.		

BAL-005-0.1b R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
R1.	*No changes.*				
R2.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for	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.	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.

			consistency with FERC Guideline 2.		
R5.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for consistency with FERC Guideline 2.	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.	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.
Revised R7.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2 and the NERC Guidelines filed with FERC on August 11, 2009. Under the Severe VSL, deleted, "if	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying	NERC compared the revised 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	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

	their" and inserted, "If its."		Guideline 2a. NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	with the requirement and the degree of compliance can be determined objectively and with certainty.	period of time.
Revised R9.	In accordance with Guideline 2 and the NERC Guidelines filed with FERC on August 11, 2009, under Severe the VSL, NERC deleted Interchanged, and inserted, "Interchange."	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of	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.	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.

			penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for consistency with FERC Guideline 2.		
Revised R9.1.	In accordance with Guideline 2 and the NERC Guidelines filed with FERC on August 11, 2009, under the Severe VSL, NERC deleted, “their” and inserted, “its.”	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for consistency with FERC Guideline 2.	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.	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.
R10.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This	NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not	The VSL assignments comply with Guideline 4, because they are based on a single violation of a

			is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for consistency with FERC Guideline 2.	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.	Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.
Revised R12.1	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Specifically, Lower, Moderate, and High VSLs were added, which employ a gradation approach to determine levels of non-compliance based on a percentage.	See Guideline 1 Report.	The previously binary VSL was numerically gradated; therefore, Guideline 2a is no longer applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not	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.	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.

			subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R12.2.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2 and the NERC Guidelines filed with FERC on August 11, 2009. Specifically, Lower, Moderate, and High VSLs were added, which employ a gradation approach to determine levels of non-compliance based on a percentage.	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The previously binary VSL was numerically gradated; therefore, Guideline 2a is no longer applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.
Revised R12.3.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2 and the NERC Guidelines filed with FERC on	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is	NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the	The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are

	August 11, 2009. Under the Severe VSL, deleted "Balancing Authority failed to" and inserted "applicable entity did not," and deleted, "between two or more Balancing Authorities to deliver the output of Jointly Owned Units or to serve remote load."		consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	not based on a cumulative number of violations of the same requirement over a period of time.
R15.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. 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. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and	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.	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.

			objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for consistency with FERC Guideline 2.		
R16.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2.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. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for consistency with FERC	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.	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.

			Guideline 2.		
R17.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. Therefore, no changes to the VSLs were necessary for consistency with FERC Guideline 2.	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.	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.

BAL-006-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2 and the NERC Guidelines filed with FERC on August 11, 2009. Specifically, Lower, Moderate, and High VSLs were added, which employ a gradation approach to determine levels of non-compliance based on a percentage.	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The previously binary VSL was numerically gradated; therefore, Guideline 2a is no longer applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	The VSL assignments comply with Guideline 4, because the Compliance Monitoring process is based on a measurement of performance over a period of time. NERC will modify this requirement to reflect the measure more accurately in the future.
Revised R3.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2 and the NERC Guidelines filed with FERC on	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The previously binary VSL was numerically gradated; therefore, Guideline 2a is no longer applicable. The	NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability	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

	August 11, 2009. Specifically, Lower, Moderate, and High VSLs were added, which employ a gradation approach to determine levels of non-compliance based on a percentage.		gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. The VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	number of violations of the same requirement over a period of time.

CIP-001-1 R#	Explanation of Changes	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 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	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R1	*No changes*	See Guideline 1 Report.	The requirement has gradated VSLs; 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 to the VSLs were required. 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	NERC compared the existing requirement 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.	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.

			language satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
R2	*No changes*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2. 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,	NERC compared the existing requirement 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.	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.

			relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R3	The VSLs were modified to be consistent with FERC Guideline 3. Under Moderate VSL, deleted "has demonstrated the existence of a" and inserted, "provided its operating personnel with a sabotage [response guideline], but failed to include the personnel to contact." Also deleted, "but the guideline did not list all of the appropriate personnel to contact." Under the High VSL, deleted, "The responsible entity has demonstrated the existence of a response guideline for reporting disturbances due to sabotage events, including all of the appropriate personnel to contact, but	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required consistency with FERC Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective	In accordance with Guideline 3, NERC has revised the VSL assignments to remove a prior redundant aspect of the guideline now being available to operating personnel. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

	the guideline was not available to its operating personnel." Inserted, "N/A." Under Severe VSL, deleted "have" and inserted, "provide its operating personnel with [a] sabotage." Deleted, "for reporting disturbances due to sabotage events."		language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R4	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2 and NERC's August 11, 2009 informational filing submitted to FERC. Under Severe VSL, deleted, "nor" and inserted, "and has not."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2a. 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	NERC compared the existing requirement 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.	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.

			contain general, relative or subjective language, satisfying Guideline 2b. In the Severe VSL the prior phrase “nor developed a reporting procedure” was revised to say “and has not developed a reporting procedure.” Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

COM-001-1.1R#	Explanation of Changes	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 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	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
Revised R1	Consistent with Guideline 2 and NERC's August 11, 2009 informational filing submitted to FERC, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in the components. The VSLs also were revised to comply with Guideline 3. Deleted the Lower VSL and inserted, "N/A." Under Moderate VSL, deleted, "The responsible entity's telecommunications is not	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The former binary VSL has been changed to be numerically gradated; therefore, Guideline 2a is no longer applicable. The incorporation of the VSLs into the Main Requirement VSLs removes binary inconsistencies. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. NERC has reviewed the VSL text and has determined that, as modified, the VSL	In accordance with Guideline 3, NERC has revised the VSL assignments because the previous VSL assignments either redefined or undermined the requirement. The prior VSL for requirement R1 was based on the sub-requirements of R1. Incorporating the VSLs into the Main Requirement VSLs corrects duplicate VSL references that were previously applied to both R1 and sub-requirements of R1.	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.

	redundant or diversely routed as applicable and has failed to establish telecommunications internally for the exchange of interconnection or operating data needed to maintain BES reliability." Inserted, "The responsible entity failed to provide adequate and reliable telecommunications facilities for the exchange of Interconnection and operating information to one of the groups specified in R1.1, or R1.2, or R1.3." Under High VSL, deleted, "The responsible entity's telecommunications is not redundant or diversely routed as applicable and has failed to establish telecommunications internally and with other Reliability Coordinators, Transmission Operators, or Balancing Authorities for the exchange of interconnection or operating data needed to maintain BES reliability." Inserted, "The responsible entity failed to provide adequate and reliable telecommunications facilities for the exchange of Interconnection and operating information to two of the groups specified in R1.1, or R1.2, or R1.3." Under Severe VSL, inserted, "The		text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, 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.		

	responsible entity failed to provide adequate and reliable telecommunications facilities for the exchange of Interconnection and operating information to all 3 of the groups specified in R1.1, or R1.2, or R1.3. OR" and deleted, "and has failed to establish telecommunications internally and with both other and its Reliability Coordinators, Transmission Operators, or Balancing Authorities for the exchange of interconnection or operating data needed to maintain BES reliability." And inserted, "as specified in R1.4."				
Revised R1.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with		

			Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.4	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2	The Severe VSL was slightly modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2 and the NERC Guidelines filed with FERC on August 11, 2009. Specifically, the word “primary” was changed to “vital.”	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. As revised, therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective	NERC compared the 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.	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.

			application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R4	The Severe VSL was slightly modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2 and the NERC Guidelines filed with FERC on August 11, 2009. Under Severe VSL, deleted "If using," and inserted "The responsible entity used," and deleted ", the responsible entity," and inserted "and,." Also deleted "provide documentation of" and inserted "have an," and deleted "use a language other than English for all communications between and among operating personnel and responsible for the real time generation control and operation of the interconnected Bulk Electric System," and inserted "do so."	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. The VSL was re-written more succinctly to focus on its intent of ensuring that if a language other than English is used for external communications that an agreement permits its use Additionally, the VSLDT reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective	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.	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.

			application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
R5	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.
Revised R6	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has	NERC compared the existing VSLs to the stated requirement language to	The VSL assignments comply with Guideline 4, because they are based on a

	with Guideline 2. Specifically, under the Lower, Moderate, High, and Severe VSLs, edited percentages to be consistent with the gradation approach for determining levels of non-compliance. Under Lower VSL, deleted, "less than 2[5%] of," and inserted, "[5%] or less of." Deleted, "[COM-001-]0, Attachment 1," inserted "Attachment 1- [COM-001]." Under Moderate VSL, inserted, "more than," and deleted, "2[5%] or more but less than 5[%]." Inserted, "up to (and including)." Deleted, "[COM-001-]0, Attachment 1," inserted. "Attachment 1- COM-001]." Under High VSL, inserted, "more than 1[0%]," and deleted, "5[0%] or more but less than." Inserted, "up to (and including) 1[5%]." Deleted, "7[5%]." Deleted, "[COM-001-]0, Attachment 1," inserted. "Attachment 1- [COM-001." Under Severe VSL, inserted, "more than 1[5%]," and deleted, "adhere to 7[5%] or more." Deleted, "[COM-001]0, Attachment 1," inserted.		gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

	“Attachment 1- [COM-001.”				

COM-002-2 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1	The VSLs were modified for consistency with FERC Guidelines 2 and 3. The changes include format changes of "OR" conditions in the Moderate VSL and moving the prior High VSL as a second Severe VSL condition. Specifically, under Moderate VSL, inserted, "OR The responsible entity did not have voice links with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators." Under High VSL, deleted, "The responsible entity did not staff the communications (voice and data links) on a 24 hour basis." Inserted, "N/A." Under Severe VSL, inserted "OR The responsible entity's communications were not staffed and available for addressing real time emergency conditions."	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the existing VSLs to the requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability goal. The original VSL required staffing on a 24-hour basis, which is not consistent with the language in the requirement. The VSL was modified to use consistent language. In accordance with Guideline 3, the VSL assignments are now consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

Revised R1.1	The VSLs were modified for clarity, in accordance with Guideline 2. Under High and Severe VSLs, deleted “is” and inserted “was.”	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC 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. In the both the High and Severe VSLs a tense in verb change from “is” to “was” was made in the last sentence. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

EOP-001-1 R#	Explanation of Changes	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 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	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
Revised R1	The VSLs were modified to be consistent with FERC Guideline 3, as well as Guideline 2 for clarity and consistency with other Reliability Standards and VSLs. Specifically, in accordance with Guideline 2, revised Moderate and Severe VSLs to remove subjective language. Also deleted Lower and High VSLs, and inserted, "N/A." Under Moderate VSL, deleted "failed to demonstrate," and inserted "demonstrated," Deleted "the necessary" and	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments redefined and/or undermined the requirement. The existing VSLs were based on the Balancing Authority having operating agreements containing provisions for emergency assistance with a percent of adjacent Balancing Authorities. This language was not consistent with the requirement that calls for agreements with adjacent Balancing Authorities that, at a minimum, contain	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.

	inserted “an,” and inserted “agreements for 25% to 50% of the” and inserted “agreement with at least one.” Deleted “BAs. Or 25 to 50% of those agreements do not contain provisions,” and inserted “Balancing Authority,” and “but the agreement sis not include provision for obtaining emergency assistance from any remote Balancing Authority.” Under Severe VSL, deleted “failed to” and inserted “did not,” and deleted “the necessary,” and inserted “any.” Deleted “for 75% or more of the” and inserted “with,” and deleted “BAs. Or more than 75% of those agreements do not contain provisions,” and inserted “Balancing Authorities that include provision” and “with adjacent Balancing Authorities.”		multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	provisions for emergency assistance. The revised VSL is based on the Balancing Authority demonstrating the existence of an operating agreement with at least one adjacent Balancing Authority for emergency assistance, and including provisions for obtaining emergency assistance from the remote Balancing Authority. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	
Revised R2.	The VSLs were modified for clarity and consistency with other Reliability Standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, “The Transmission Operator has demonstrated the existence	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. Two VSLs are assigned to the requirements; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination	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	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.

	of the emergency load reduction plan but the plan will take longer than 30 minutes." Inserted, "N/A." Under High VSL, deleted, "fails to include details on how, " and inserted, "demonstrated the existence of an emergency [load reduction] plan." Deleted, "is to be implemented in sufficient amount and time to mitigate," and inserted, " for each identified ." Deleted, "[IROL] violation.," and inserted. "but at least one of the plans will take longer than 30 minutes to implement." Under Severe VSL, inserted, "an" and inserted an "s" on "plan."		of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	requirement and the degree of compliance can be determined objectively and with certainty.	
Revised R3.	The VSLs for the primary requirement were removed as there is no required performance in the primary requirement.				
Revised R3.1.	The VSLs were modified for clarity and consistency with other Reliability Standards and VSLs, in accordance with Guidelines 2 and 3. Specifically, in accordance with	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved	In accordance with Guideline 3, NERC has revised the VSL assignments to more evenly define association between the severity levels and the number of hours the report was provided late.	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

	Guideline 2, revised Lower, Moderate, High and Severe VSLs to remove subjective language. Under Lower VSL, deleted, "The Transmission Operator or Balancing Authority's emergency plans to mitigate insufficient generating capacity are missing minor details or minor program/procedural elements." Inserted, "N/A." Under Moderate VSL, deleted, "[Authority]'s has." Deleted, "emergency," and inserted, "a set of [plans to mitigate] operating emergencies for." Deleted, "emergency plans," and inserted, "and the plans are implemented." Under High VSL, deleted, "Authority's emergency," and inserted, "Authority demonstrated the existence of a set of [plans to mitigate] operating emergencies for." Deleted, "emergency," and inserted, "but the." Deleted, "not," and inserted, "neither." Under Severe VSL, deleted,		Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	same requirement over a period of time.

	"has [failed to] develop emergency mitigation," and inserted, "demonstrate the existence of a set of [plans] to mitigate operating emergencies."				
Revised R3.2	In accordance with Guideline 2, the VSLs were modified by removal of the "Lower" VSL for clarity and consistency with other Reliability Standards and VSLs. Specifically, in accordance with Guideline 2, revised Lower, Moderate, High and Severe VSLs to remove subjective language. Under Lower VSL, deleted "The Transmission Operator or Balancing Authority's plans to mitigate transmission system emergencies are missing minor details or minor program/procedural elements." Inserted "N/A." Under Moderate VSL, deleted "[Authority]'s has" and inserted "a set of plans to mitigate operating emergencies on the." Inserted "emergency" and	See Guideline 1 Report.	The VSLs, as modified, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

	inserted “and the” and “are implemented” and “the plans.” Under High VSL, deleted “Authority’s” and inserted “Authority demonstrated the existence of a set of plans to mitigate operating emergencies on the.” Deleted “emergency” and added “but the,” and deleted “not” and inserted “neither.” Under Severe VSL, deleted “has” and also “develop, maintain, and implement,” and inserted “demonstrate the existence of a set of plans to mitigate.” Also deleted “emergency mitigation plans for.”				
Revised R3.3	In accordance with Guideline 2, the VSLs were modified by removing the “Lower” VSL for clarity and consistency with other standards and VSLs. Specifically, in accordance with Guideline 2, revised Lower, Moderate, High and Severe VSLs to remove subjective language. Under Low VSL, deleted “The	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has more than one level of VSL; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does	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.	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.

	Transmission Operator or Balancing Authority's load shedding plans are missing minor details or minor program/procedural elements" and inserted "N/A." Under Moderate VSL, deleted "[Authority]'s has," and inserted "a set of plans for" and "and the" and "are implemented" and "the plans." Under High VSL, deleted "Authority's" and inserted "Authority demonstrated the existence of a set of plans for." Also deleted "shedding plans" and inserted "shedding but the plans" and deleted "partially compliant with the requirement but are not." Also inserted "neither." Under Severe VSL, deleted "has" and also "develop, maintain, and implement," and inserted "demonstrate the existence of a set of plans for." Also deleted "plans."		not contain general, relative or subjective language, satisfying Guideline 2b. The text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised	In accordance with Guideline 2, the VSLs were modified for	See Guideline	The VSLs, as revised, comply with Guideline 2. The	NERC compared the existing VSLs to the stated	The VSL assignments comply with Guideline 4,

R3.4	clarity and consistency with other standards and VSLs. Specifically, in accordance with Guideline 2, revised Lower, Moderate, High and Severe VSLs to remove subjective language. Under Lower VSL, deleted "The Transmission Operator or Balancing Authority's system restoration plans are missing minor details or minor program/procedural elements." Inserted "N/A." Under Moderate VSL, deleted "Authority's" and inserted "Authority demonstrated the existence of a set of plans for" and deleted "plans." Inserted "and the plans" and deleted "partially compliant with the requirement" Inserted "implemented" and "the plans." Under High VSL, deleted "Authority's" and inserted "Authority demonstrated the existence of a set of plans for system" and deleted "restoration," and inserted "restoration but the." Deleted	1 Report.	requirement has more than one level of VSL; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

	"not" and inserted "neither." Under Severe VSL, deleted "has" and "develop, maintain, and implement operating emergency mitigation." Inserted "demonstrate the existence of a set of."				
Revised R4.	Consistent with Guideline 2 and the Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in the components. Under Lower VSL, deleted "failed" and inserted "demonstrated the existence of emergency plans that will enable it." Deleted "comply with one (1) of the" and inserted "mitigate operating emergencies but the plans do not include," and deleted "components," and inserted	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has more than one level of 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 to the VSLs were required for consistency with FERC Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the	NERC compared the revised requirement 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.	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.

	"requirement R4.4." Under Moderate VSL, deleted "failed" and inserted "demonstrated the existence of emergency plans that will enable it." Deleted "comply with two (2) of the," and inserted "mitigate operating emergencies but the plans do not include" and deleted "components" and inserted "requirement R4.3." Under High VSL, deleted "has failed" and inserted "demonstrated the existence of emergency plans that will enable it." Deleted "comply with three (3) of the" and inserted "mitigate operating emergencies but the plans do not include either." Deleted "components" and inserted "requirement R4.1 or R4.2." Under Severe VSL, deleted 'has failed" and inserted "demonstrated the existence of emergency plans that will enable it," and deleted "comply with all four (4)" and inserted "mitigate operating emergencies but the plans are missing two (2) or more."		possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

	Deleted “components,” and inserted “requirements identified for R4.”				
Revised R4.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R4.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R4.3	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R4.4	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R6.	The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs in accordance with Guideline 2.	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single	NERC compared the revised requirement VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement’s reliability goal.	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

	The changes include format changes of “OR” conditions in the Severe VSL and moving the prior High VSL as a second Severe VSL condition. Under the Lower VSL, deleted, “The Transmission Operator and Balancing Authority is missing minor program/procedural elements.” Inserted, “N/A.” Under Moderate VSL, deleted “The Transmission Operator and Balancing Authority has failed to annually review one of it's emergency plans.” Inserted, “N/A.” Under High VSL, deleted “The Transmission Operator and Balancing Authority has failed to annually review 2 of its emergency plans or communicate with 1 of its neighboring Balancing Authorities.” Inserted, “N/A.” Under Severe VSL, corrected typographical errors and made stylistic edits, and inserted, “OR The Transmission Operator or		VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because it contained the words “at least once in the past thirteen calendar months.” This time period was not in the requirement. The revised text clarifies the VSLs by removing the ambiguous words and replacing with text that matches the language of the requirement. Therefore, the revised VSLs eliminate the possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	number of violations of the same requirement over a period of time.

	Balancing Authority failed to provide a copy of one of its updated emergency plans to."				
Revised R7	The VSLs were modified for clarity and consistency with other standards and VSLs in accordance with Guideline 2. Consistent with Guidelines filed with FERC on August 11, 2009 NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, deleted, "and/" [or] the [Balancing Authority] failed to comply," and inserted, "demonstrated that it coordinated its emergency plans." Deleted, "one (1) of the sub-components." Inserted, "other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in R7.4 was applicable and was not included." Under Moderate VSL, deleted, "and/" [or] the [Balancing Authority] failed to comply,"	See Guideline 1 Report.	NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSLs were based on the Transmission Operator or Balancing Authority demonstrated that it coordinated its emergency plans with other Transmission Operators and Balancing Authorities and included conditions specified in the subrequirements as appropriate. All sub-requirements were given equal weight. The revised text clarifies the VSLs by specifying the subrequirements associated with each level of VSL and increasing the level to Severe if the conditions specified in 2 or more of the subrequirements are not met. Therefore, the revised VSLs eliminate the possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance	NERC compared the revised requirement 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.	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.

	and inserted, “demonstrated that it coordinated its emergency plans.” Deleted, “two (2) of the sub-components.” Inserted, “other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in R7.3 was applicable and was not included.” Under High VSL, deleted, “and/” [or] the [Balancing Authority] failed to comply,” and inserted, “demonstrated that it coordinated its emergency plans.” Deleted, “three (3) of the sub-components.” Inserted, “other Transmission Operators and Balancing Authorities as appropriate but the coordination specified in either R7.1 or R7.2 was applicable and was not included.” Under Severe VSL, deleted, “and/” [or] the [Balancing Authority] failed to comply,” and inserted, “demonstrated that it coordinated its emergency plans.” Deleted, “(4” and inserted, “other Transmission Operators and		Enforcement Authority.		

	Balancing Authorities as appropriate but the coordination specified in two (2." Deleted "components" and inserted, "requirements was applicable and was not included."				
Revised R7.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R7.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R7.3	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R7.4	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

EOP-002-2.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified to be consistent with FERC Guideline 4, as well as for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under High VSL, deleted, "N/A" and inserted, "The Balancing Authority or Reliability Coordinator failed to provide evidence that it has responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its respective area." Under Severe VSL, deleted, "Balancing Authority or Reliability Coordinator does not have responsibility and clear decision-making authority" and inserted, "responsible entity failed." Deleted, " to take whatever actions are needed to ensure the reliability of its respective area OR The Balancing Authority or Reliability Coordinator did not" and corrected typographical and made stylistic changes.	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The previously binary VSL was gradated; therefore, Guideline 2a is no longer applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as revised, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the revised 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.	In accordance with Guideline 4, NERC has revised the VSLs, because the VSL was based on multiple violation occurrences when not permitted by the requirement language. The existing VSL used the words –"to alleviate capacity and energy emergencies" – this was revised to "alleviate a capacity or energy emergency"- making it clear that it is for each occurrence.

EOP-002-2.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R2.	The VSLs were modified to be consistent with FERC Guideline 3. Specifically, deleted "did not" and inserted, "failed to."	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The existing VSL used the words "failed to provide evidence that it implemented" these words were revised to be consistent with the requirement to "failed to implement." As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.
Revised R3.	The VSLs were modified to be consistent with FERC Guidelines 2 and 3. Under High VSL, deleted, "The Balancing Authority communicated its current and future system conditions to its	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe level. Such change is consistent with the	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The existing VSL used the	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.

EOP-002-2.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	Reliability Coordinator but did not communicate to one or more of its neighboring Balancing Authorities." Inserted, "N/A." Under Severe VSL, deleted, "has" and inserted, "experienced an operating capacity or energy emergency and." Also inserted, "its."		Commission's June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements.	words "failed to provide evidence that it communicated" these words were revised to include the actual words in the requirement. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	
Revised R4.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Severe VSL, deleted, "has" and inserted, "anticipating an operating capacity or energy emergency." Deleted, "the" and inserted, "all actions necessary." Deleted, "actions as required and stated" and inserted, "including bringing on all available generation, postponing equipment maintenance, scheduling interchange purchases." Deleted, "the requirement." Inserted, "advance, or preparing to reduce firm load."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed	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.	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.

EOP-002-2.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
			to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R5.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under High VSL, inserted, "OR The Balancing Authority unilaterally adjusted generation in an attempt to return Interconnection frequency to normal beyond that supplied through frequency bias action and Interchange Schedule changes." Under Severe VSL, deleted, "and." Inserted, "AND The Balancing Authority." Deleted, "adjust" and inserted, "adjusted."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b; however, a second condition was added to the High VSL to further clarify the conditions. Therefore, as revised, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the	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.	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.

EOP-002-2.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
			VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R6.	The VSLs were modified to be consistent with FERC Guideline 3. The VSLs were also modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, deleted, "The Balancing Authority failed to comply with one of the sub-components." Inserted, "N/A." Under Moderate VSL, deleted, "The Balancing Authority failed to comply with 2 of the sub-components." Inserted, "N/A." Under High VSL, deleted, "failed" and inserted, "was not able." Deleted, "3" and inserted, "the Control Performance and	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the	In accordance with Guideline 3, NERC has revised the VSL assignments. Another option was added for the Severe VSL to align more closely with the language in the requirement As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

EOP-002-2.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	Disturbance Control Standards and failed to immediately implement one (1)." Deleted, "components" and inserted, "requirements R6.1, R6.2, R6.3, R6.4, R6.5 or R6.6." Under Severe VSL, deleted, "failed" and inserted, "was not able." Deleted, "3" and inserted, "the Control Performance and Disturbance Control Standards and failed to immediately implement one (1)." Deleted, "components" and inserted, "requirements R6.1, R6.2, R6.3, R6.4, R6.5 or R6.6. OR The Balancing Authority was not able to comply with the Control Performance and Disturbance Control Standards and did not immediately implement any remedies."		VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R6.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R6.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement,		

EOP-002-2.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
			consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R6.3	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R6.4	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R6.5	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R6.6	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R7.	The VSLs were modified to be consistent with Guideline 3. Consistent with Guideline 2 and	See Guideline 1	The VSLs, as revised, comply with Guideline 2. The requirement has gradated	NERC compared the revised VSLs to the stated requirement language to	The VSL assignments comply with Guideline 4, because they are based on a single violation

EOP-002-2.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	the Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under High VSL, deleted, "has met only one of" and inserted, "exhausted." Deleted, "two requirements" and inserted, "steps listed in R6 or the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirement R7.1. OR The Balancing Authority exhausted the steps listed in R6 or the steps listed in R6 could not be completed in sufficient time to resolve the emergency condition, and the Balancing Authority failed to meet sub-requirement R7.2." Under Severe VSL, changed the "OR" condition to an "AND" condition.	Report.	VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	ensure the VSLs do not redefine or undermine the requirement's reliability goal. The original VSL did not reference sub-requirement 7.1. The VSL has been modified to now include sub-requirement 7.1. 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.	of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.

EOP-002-2.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R7.1	Incorporated into VSL of Main Requirement		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R7.2	Incorporated into VSL of Main Requirement		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R8.	The VSLs were modified to be consistent with Guidelines 2 and 3. Under the Lower VSL, deleted, "The Reliability Coordinator's implementation of an Energy Emergency Alert has missed minor program/procedural elements in Attachment 1-EOP-002-0." Inserted, "N/A." Under Moderate VSL, deleted, "N/" and inserted, "A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability	See Guideline 1 Report.	The revised VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2a. 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	In accordance with Guideline 3, NERC has revised the VSL assignments. NERC has moved and eliminated the Lower level and added a new Severe VSL to align more closely with the language in the requirement and to more fully identify degree of noncompliant performance. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

EOP-002-2.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	Coordinator did not initiate an Energy Emergency Alert Level 1 as detailed in Attachment 1-EOP-002-0 'Energy Emergency Alert Levels.'" Under High VSL, deleted, "N/" and inserted, "A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing a potential or actual Energy Emergency and the Reliability Coordinator did not initiate an Energy Emergency Alert Level 2 or 3 as detailed in Attachment 1-EOP-002-0 'Energy Emergency Alert Levels.'" Under Severe VSL, deleted, "The Reliability Coordinator has failed to meet one or more of the requirements of Attachment 1-EOP-002-0." Inserted, "A Reliability Coordinator had a Balancing Authority within its Reliability Coordinator area experiencing an actual Energy Emergency and the Reliability Coordinator did not act to mitigate the emergency condition by requesting emergency		subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

EOP-002-2.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	assistance when this was required."				
Revised R9.	The VSLs for the primary requirement were removed as there is no required performance in the primary requirement.				
Revised R9.1.	The VSLs were modified to be consistent with Guideline 3. Under the Severe VSL, deleted, "The" and inserted, "For an expected elevation in transmission service priority from Priority 6 to Priority 7, the deficient." Deleted, "to" and inserted "[initiate an Energy Emergency Alert] in accordance with Attachment 1-EOP-002-0."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the	In accordance with Guideline 3, NERC has revised the VSL assignments. NERC added the conditions specified in the requirement to align more closely with the language in the requirement. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

EOP-002-2.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
			VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R9.2.	The VSLs were modified to be consistent with Guideline 2. Under Severe VSL, deleted, “has” and inserted, “[failed to] submit the.” Deleted, “as directed in the requirement.” Inserted, “for posting on the NERC Website, noting the expected total MW that may have its transmission service priority changed.”	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe category level. Such change is consistent with the Commission’s June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements. 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. Therefore, the text is not	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.	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.

EOP-002-2.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
			subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R9.3.	The VSLs were modified to be consistent with Guideline 2. Under the Severe VSL, deleted, “as directed in” and inserted, “of an Interchange Transaction on” and deleted “requirement.” And inserted, “system from Priority 6 to Priority 7.”	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe category level. Such change is consistent with the Commission’s June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the	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.	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.

EOP-002-2.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
			possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R9.4.	The VSLs were modified to be consistent with Guideline 2. Under Severe VSL, deleted, “as directed in” and inserted, “of an Interchange Transaction on.” Deleted, requirement.” And inserted, “system from Priority 6 to Priority 7.”	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe category level. Such change is consistent with the Commission’s June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the	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.	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.

EOP-002-2.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
			possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

EOP-003-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	Severe VSL was modified for clarity and consistency with other Standards and VSLs, in accordance with Guideline 2. In accordance with Guideline 2, deleted, “has” and inserted, “to.”	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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
Revised R2	The VSL was modified for clarity and consistency with other standards and VSLs, in accordance with Guidelines 2 and 3. Under the Severe VSL, deleted, “applicable” and inserted, “responsible [entity].”	See Guideline 1 Report.	The VSL, as revised, complies with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The language was restated to more precisely reflect the language of the requirement	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.

EOP-003-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
			reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	and the VSL made binary at the Severe level. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	
Revised R3.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Deleted “applicable” and inserted, “responsible [entity]” for each VSL level. Under Moderate VSL, deleted “between” and inserted, “more than [5-%] up to (and including).” Under High VSL, inserted “more than [10%], up to (and including)” and deleted, “inclusive” and inserted, “or	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the	NERC compared the revised 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.	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.

EOP-003-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	less." Under Severe VSL, deleted, "greater" and inserted, "more."		VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R5.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under the Severe VSL, deleted, "has [failed to implement load shedding] as directed" and inserted, "in steps established to minimize." Deleted, "requirement." Inserted, "risk of further uncontrolled separation, loss of generation, or system shutdown."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the revised 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.	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.

EOP-003-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R6.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Severe VSL, deleted, “did not” and inserted, “failed to [shed] additional [load] after it had separated from the Interconnection when there was insufficient generating capacity to restore system frequency following automatic underfrequency load shedding.”	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the revised 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.	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.
Revised R8.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Deleted “applicable” and inserted, “responsible [entity]” for each VSL level. Under High VSL, inserted, “has	See Guideline 1 Report.	The revised VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has	NERC compared the revised 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	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.

EOP-003-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	plans for manual load shedding but."		reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	compliance can be determined objectively and with certainty.	

EOP-004-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R2.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, "N/A" and inserted, "The responsible entity failed to promptly analyze 5% or less of its disturbances on the BES." Under Moderate VSL, deleted "entities has" and inserted, "entity [failed to] promptly." Deleted, "1%" and inserted, "more than 5% up" and deleted, "25" and inserted, "(and including) 10[%]." Deleted, "or was negligent in the timeliness of analyzing the disturbances 1% to 25% of the time." Under High VSL, deleted, "entities has" and inserted, "entity [failed to] promptly." Deleted, "26%" and inserted, "more than 10% up" and deleted, "50" and inserted, "(and including) 15[%]." Deleted, "or was negligent in the timeliness of analyzing the disturbances 26% to 50% of the time."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

EOP-004-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	Under Severe VSL, deleted, “entities has” and inserted, “entity [failed to] promptly.” Deleted, “50%” and inserted, “15% up” and deleted, “50” and inserted, “15[%].” Deleted, “or negligent in the timeliness of analyzing the disturbances more than 50% of the time”				
Revised R3.1	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 3. Under Lower VSL, deleted, “N/A.” Inserted, “The responsible entity submitted the report as required in R3.1 more than 24 but less than or equal to 36 hours after the disturbance or unusual occurrence, or discovery of the disturbance or unusual occurrence.” Under Moderate VSL, deleted, “[entit]ies,” and inserted, “[entit]y.” Deleted, “within 25 to,” and inserted, “as required in R3.1 more than.” Deleted, “of ,” and inserted, “but less than or equal to 48 hours after.” Inserted, “or unusual occurrence, [or discovery of the disturbance] or	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple	In accordance with Guideline 3, NERC has revised the VSL assignments to define the association between the severity levels and the number of hours the report was provided late. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

EOP-004-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	unusual occurrence." Under High VSL, deleted, "within 36 to [48]," and inserted, "as required in R3.1 more than." Deleted, "of," and inserted, "but less than or equal to 72 hours after." Inserted, "or unusual occurrence, [or discovery of the disturbance] or unusual occurrence." Under Severe VSL, inserted, "as required in R3.1." Deleted, "48" and inserted, "72-[hours]." Inserted, "or unusual occurrence [or discovery of the disturbance] or unusual occurrence."		interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
R3.2	*No changes*.	N/A	N/A	N/A	N/A
Revised R3.3.	The VSLs were modified to be consistent with Guidelines 2 and 3. Under Lower VSL, deleted, "The responsible entity provided its Reliability Coordinator and NERC with periodic, verbal updates about a disturbance, but the updates did not include all information that was available at the time." Deleted, "N/A," Under Severe VSL, inserted, "Regional [Reliability]" and	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to delete the Lower VSL and assign it a binary VSL at the Severe level. Such change is consistent with the Commission's June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment	NERC compared the revised VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability goal. The original VSLs referred to the Reliability Coordinator, but the requirement referred to the Regional Reliability Organization. The VSL was modified to reflect the correct entity. In accordance with Guideline 3, the VSL assignments are consistent	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.

EOP-004-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	deleted, “Coordinator” and inserted, “Organization(s)” and inserted “notification or.”		of penalties for violations of binary requirements. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	with the requirement and the degree of compliance can be determined objectively and with certainty.	
Revised R3.4.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, “entities” and inserted, “entity submitted the.” Deleted “is” and inserted, “no more than 30 days past the 60 day due date; or the final report was.” Deleted, “minor details or minor program/procedural” and inserted, “one of the three [elements]	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is	NERC compared the revised 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.	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.

EOP-004-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	specified in R3.4." Under Moderate VSL, deleted, "entities" and inserted, "entity submitted the final report between 31 days and 60 days inclusive past the 60 day due date. OR The" and deleted "30 days late or was [missing] one" and inserted, "two of the three" and deleted "the requirement." And inserted, "R3.4." Under High VSL, deleted, "The responsible entities final report was more than 30 days late or was missing two of the elements specified in the requirement." Inserted, "The responsible entity submitted the final report between 61 days and 90 days inclusive past the 60 day due date." Under Severe VSL, deleted, "entities" and inserted, "entity failed to submit the" and deleted, "was not. OR The responsible entity [submitted] the final report 91 days [or] more past the 60 day due date OR The responsible entity submitted		clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

EOP-004-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	a final report that." Deleted, "more than two" and inserted, "all three." And deleted, "the requirement" and inserted, "R3.4."				

EOP-005-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
R2.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.
Revised R3.	The VSLs were modified to be consistent with Guideline 2. Under the Severe Level, Deleted the word, "top."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2a. The requirement has a binary VSL assignment at the Severe level. This is consistent with	NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the	The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on

EOP-005-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
			other single VSL assignments, for binary requirements, satisfying Guideline 2a. NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language. The revised text clarifies the VSLs by removing the ambiguous qualifier (top) from the VSL. Therefore, the revised VSLs eliminate the possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	a cumulative number of violations of the same requirement over a period of time.
Revised R4.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, "one" and inserted, "5% or less." Deleted, "listed" and inserted, "identified."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties.	NERC compared the revised 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	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.

EOP-005-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	Under Moderate VSL, deleted, "two" and inserted, "more than 5% up to (and including) 10%" and deleted, "listed" and inserted, "identified." Under High VSL, "three" and inserted, "more than 10% up to (and including) 15%." Deleted, "listed and inserted, "identified." Under Severe VSL, deleted, "four or" and inserted," than 15%." Deleted, "listed" and inserted, "identified."		Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	determined objectively and with certainty.	
Revised R6.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted "The responsible entity only trained less than 100% but greater than" and inserted, "Transmission Operator." Deleted, "[or] equal" and inserted, and inserted "Balancing Authority failed." Deleted, "67 %" and inserted, "train 5% or less." Under Moderate VSL, "The	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective	NERC compared the revised 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.	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.

EOP-005-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	responsible entity only trained less than 100% but greater than" and inserted, "Transmission Operator." Deleted, "[or] equal" and inserted, "Balancing Authority failed." Deleted, "33" and inserted, "train more than 5% up to (and including) 10[%]." Under High VSL, deleted, "responsible entity only trained less" and inserted, "Transmission Operator or Balancing Authority failed to train more." Deleted, "33" and inserted, "10 % up to (and including) 15[%]." Under Severe VSL, deleted, "responsible entity did not trained any" and inserted, "Transmission Operator or Balancing Authority failed to train more than 15%."		language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R7.	The VSLs were modified to be consistent with FERC Guideline 2, as well as for clarity and consistency with other standards and VSLs. Under Lower VSL, deleted, "The responsible entity verified 76% to 99% of the restoration procedure by actual testing or by simulation." Inserted, "N/A."	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe level. Such change is consistent with the Commission's June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment	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.	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.

EOP-005-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	Under Moderate VSL, deleted, "The responsible entity verified 51% to 75% of the restoration procedure by actual testing or by simulation." Inserted, "N/A." Under High VSL, deleted, "The responsible entity verified 26% to 50% of the restoration procedure by actual testing or by simulation." Inserted, "N/A." Under Severe VSL, deleted, "responsible entity verified less than 26% of" and inserted, "Transmission Operator or Balancing Authority did not verify."		of penalties for violations of binary requirements. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
R8.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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,	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.	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.

EOP-005-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
			relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R9.	The VSLs were modified to be consistent with FERC Guideline 3. Under High VSL, deleted, "N/A" and inserted, "The Transmission Operator documented the Cranking Paths, including initial switching requirements, between each blackstart generating unit and the unit(s) to be started, but did not provide the documentation as requested by the Regional Reliability Organization." Under Severe VSL, deleted, "shall" and inserted, "failed to." Deleted, "and shall provide this documentation for review by the Regional Reliability Organization upon request."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. Specific language was added to match the language of the requirement in the conditions for severity levels. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

EOP-005-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
			needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R10.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Note that quartiles were used, since the VSL apply to number of blackstart generating units (normally a small number). Using smaller percentages would assign an inappropriate amount of weight to individual units, potentially resulting in a "Severe" violation for not including a single unit.	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

EOP-005-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
R10.1	*No changes*.	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.
Revised R11.5	Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.	See Guideline 1 Report.	The VSLs comply with Guideline 2a. The requirement has a binary VSL assignment at the level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a.	NERC compared the revised 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	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

EOP-005-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	Lower, Moderate, and High VSLs were deleted. Under Severe VSL, deleted, "The responsible entity failed to include four of the subrequirements." Inserted, "The Transmission Operator attempted to resynchronize an isolated area(s) with a surrounding area(s) when one (1) or more of the sub-requirements of R11.5 were not met."		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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	time
Revised R11.5.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R11.5.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

EOP-005-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R11.5.3	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R11.5.4	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

EOP-006-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, inserted the word, "not." Deleted, "more than 75%" and inserted, "5% or less." Deleted, Operators" and inserted, "Operators." Under Moderate VSL, inserted the word, "not." Deleted, "[5]0% but less than 75%" and inserted, "% up to (and including) 10%." Deleted, Operators" and inserted, "Operators." Under High VSL, inserted the word, "not." Deleted, "25% but less than 50," inserted, "10% up to (and including) 15[%]." Deleted, Operators" and inserted, "Operators." Under Severe VSL, deleted, "any" and inserted "more than 15%." Deleted, Operators" and inserted, "Operators."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as revised, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the revised 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.	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.
R2.	*No changes*.	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not	NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not	The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability

EOP-006-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
			applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as revised, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	Standard and are not based on a cumulative number of violations of the same requirement over a period of time.
Revised R3.	The VSLs were modified to be consistent with Guideline 3, as well as for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Moderate VSL, deleted, "coordinate with one" and inserted, "provide coordination between less than 10% of its."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties.	NERC compared the revised VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability goal. The original VSL did not include the ensuring that reliability is maintained during system restoration events. The language was	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.

EOP-006-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	Under High VSL, deleted, "coordinate with" and inserted, "provide coordination between 10% or." Deleted, "than one individual" and inserted, "of the." Under Severe VSL, inserted, "OR The Reliability Coordinator's Reliability Coordinator Area restoration plan does not ensure reliability is maintained during system restoration events."		Additionally, NERC has reviewed the VSL text and has determined that, as revised, the VSL text is clear, specific and objective and does not contain general, relative or subjective language satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	added to be consistent with 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.	
Revised R4.	The VSLs were modified to be consistent with FERC Guidelines 2 and 3. Under Lower, Moderate, and High VSLs, deleted, "The Reliability Coordinator failed to disseminate information regarding restoration to one neighboring Reliability Coordinator or Transmission Operator or Balancing Authority not immediately involved in restoration." Inserted, "N/A." Under Severe VSL, deleted "disseminate" and inserted, "serve as primary contact for	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement made it binary and assigned it a Severe level. Such change is consistent with the Commission's June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements. Additionally, NERC has reviewed the VSL text and has determined that, as	NERC compared the revised VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability goal. The original VSLs required the actual dissemination of information, which is beyond what is included in the requirement. NERC modified the VSLs to match the requirement. In accordance with Guideline 3, the VSL assignments are consistent with the requirement and the degree of compliance can be	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.

EOP-006-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
	disseminating." Deleted, "to four or more neighboring Reliability Coordinators or Transmission Operators or Balancing Authorities not immediately involved [in] restoration." Inserted, "accordance with Requirement R4."		revised, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	determined objectively and with certainty.	
Revised R5.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Severe VSL, deleted, "Coordinators" and inserted, "Coordinator." Deleted, "and caused a Burden on adjacent Transmission Operator, Balancing Authority, or Reliability Coordinator Areas." Inserted, "as stated in Requirement R5."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has added the words as shown for clarity and has determined that, as revised, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the	NERC compared the revised 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.	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.

EOP-006-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
			possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
R6.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under the Severe VSL, deleted "has been" and inserted, "was."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as revised, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement	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.	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.

EOP-006-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
			Authority.		

EOP-009-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R2.	The VSLs were modified to be consistent with FERC Guidelines 2 and 3. Under Lower VSL, deleted, "The Generator Operator has provided the Blackstart testing documentation to its Regional Reliability Organization. However the documentation provided had missing minor program/procedural elements or failed to provide the documentation requested to NERC in 30 days." Inserted, "N/A." Under Severe VSL, inserted, "Generator Owner or." Deleted, "Blackstart" and inserted, "blackstart." And inserted, "or upon request to NERC."	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe level. Such change is consistent with the Commission's June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements. 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. Therefore, the text is not subject to the	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The Lower VSL was eliminated because it expanded upon the requirement and allowed the Responsible Entity to partially comply, which is not allowed in this requirement. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

EOP-009-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
			possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

FAC-001-0 R#	Explanation of Changes	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 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	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement No	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
Revised R1.	The VSLs were modified to be consistent with FERC Guideline 3. Consistent with Guideline 2 and the Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on including specified components. Under Moderate VSL, deleted, "[Owner]'s," and inserted, "failed to do one of the following: Document or maintain or publish [facility connection requirements] as specified in the Requirement OR." Inserted, "Failed."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The revised VSLs include language consistent with the requirement such as "document, maintain and publish." As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

	Deleted, “f[ailed to] address connection requirements for one of the subrequirements,” and inserted, “include one (1) of the components and specified in R1.1, R1.2 or R1.3.” Under High VSL, deleted, “[Owner]’s facility [connection requirements] failed to address,” and inserted, “failed to do one of the following: Document or maintain or publish its facility [connection requirements] as specified in the Requirement. OR Failed to include (2) of the components as specified in R1.1, R1.2 or R1.3 OR Failed to document or maintain or publish its facility.” Deleted, “for two of the subrequirements.” Inserted, “as specified in the Requirement **and** failed to include one (1) of the components as specified in R1.1, R1.2 or R1.3.” Under Severe VSL, “deleted,		subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

	"[Owner]'s [facility connection requirements] failed to address connection requirements for three of the subrequirements." Inserted, "Owner's did not develop."				
Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. For the Lower, Moderate, High, and Severe VSLs, deleted, "Transmission Owner" and inserted, "responsible entity."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no	NERC compared the existing requirement 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	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.

	Also inserted numerical values in number format instead of word format.		changes to the VSLs 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	degree of compliance can be determined objectively and with certainty.	

FAC-002-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified for clarity and consistency with other standards and VSLs. Consistent with Guideline 2 and the Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards	NERC compared the existing requirement 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	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.

	that compliance is based on including specified components. Corrected capitalization. Deleted, "subrequirements." Inserted, "subcomponents (R1.1 to R1.5)." Also deleted "Responsible Entity," and inserted "responsible entity." Deleted "their" and inserted "its."		in the determination of penalties. On that basis, no changes to the VSLs 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	
Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for		

			the purposes of clarity.		
Revised R1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.5.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.	The VSLs were modified to be consistent with FERC Guidelines 2 and 3, as well as for clarity and consistency with other standards and VSLs. Adjusted calendar range for each VSL. Under Low VSL deleted “,” and “not more,” and inserted “less.” Deleted “45” and inserted “or	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The following language was added to the Severe VSL to remain consistent with the requirement “for the required three-year period.”	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.

	equal to 40.’ Deleted “,” Under Moderate VSL, deleted “45” and inserted “40” and deleted “not more” and inserted “less.” Deleted “60” and added “equal to 50.” Under High VSL, inserted “50 calendar days but less than or equal to” and deleted “, but not more than 120 calendar days,” Under Severe VSL, deleted “120” and inserted “60” and inserted “for the required three-year period.”		FERC Guideline 2. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	The VSLs were modified to be in 10 day increments in order to be consistent with other standard VSLs. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	

FAC-003-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. For each VSL, deleted, “applicable,” and inserted, “responsible.” Under Severe VSL, deleted, “four of the four,” and inserted, “all.”	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the existing requirement 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.	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.

Revised R1.2.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guidelines 2 and 3. For Lower, Moderate, and High VSLs, deleted, “Not Applicable.” Inserted, “N/A.” Under Severe VSL, deleted, “The Transmission Owner's TVMP does not specify clearances.” Inserted, “The responsible entity, in its TVMP, failed to identify and document clearances between vegetation and any overhead, ungrounded supply conductors. OR The responsible entity, in its TVMP, failed to take into consideration transmission line voltage, or the effects of ambient temperature on conductor sag under maximum design loading, or the effects of wind velocities on conductor sway. OR The responsible entity, in its TVMP, failed to establish Clearance 1 or Clearance 2	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The VSL was The VSLs were modified to include specific language from the requirements. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

	values."				
Revised R1.2.1.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. The VSLs also were modified with Guideline 3. For Lower, Moderate, and High VSLs, deleted, "Not Applicable." Inserted, "N/A." Under Severe VSL, deleted, "The Transmission Owner's TVMP does not specify Clearance 1 values." Inserted, "The responsible entity failed to determine and document an appropriate clearance distance to be achieved at the time of transmission vegetation management work taking into account local conditions and the expected time frame in which the responsible entity expects to return for future vegetation management work.	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The VSLs were modified to include specific language from the requirements. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

	OR The responsible entity documented a Clearance 1 value that was smaller than its Clearance 2 value.”				
Revised R1.2.2.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. The VSLs also were revised to comply with Guideline 3. For Lower, Moderate, and High VSLs, deleted, “Not Applicable.” Inserted, “N/A.” Under Severe VSL, deleted, “The Transmission Owner's TVMP does not specify Clearance 2 values.” Inserted, “The responsible entity failed to determine and document Clearance 2 values taking into account local conditions and the expected time frame in which the responsible entity expects to return for future vegetation management work.”	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The VSLs were modified to include specific language from the requirements. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.
Revised 1.2.2.1.	The VSLs were modified for clarity and consistency with	See Guideline 1	The VSLs, as revised, comply with Guideline 2. The	NERC compared the existing VSLs to the stated	The VSL assignments comply with Guideline 4,

	other standards and VSLs, in accordance with Guideline 2. For Lower, Moderate, and High VSLs, deleted, "Not Applicable." Inserted, "N/A." Under Severe VSL, deleted, "are" and inserted, "were."	Report.	requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.
Revised R1.3.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, "One or more persons" and inserted, "For responsible entities." Deleted, "involved" and inserted, "involving fewer than 20 persons." Deleted, "(but not more than	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is	NERC compared the existing requirement 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	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.

	35%" and inserted ", one." Deleted, "the all personnel involved)," and inserted, "those persons." Inserted, "For responsible entities directly involving 20 or more persons in the design and implementation of the TVMP, 5% or less of those persons did not hold appropriate qualifications and training to perform their duties." Under Moderate VSL, deleted, "More than 35% of all personnel" and inserted, "For responsible entities." Deleted, "involved" and inserted, "involving fewer than 20 persons." Deleted, "(but not more than 70% of all personnel involved)," and inserted, "two of those persons." Inserted, "For responsible entities directly involving 20 or more persons in the design and implementation of the TVMP, more than 5% up to (and including) 10%of those persons did not hold appropriate qualifications and training to perform their duties."'		clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	with certainty.	

	Under High VSL, deleted, "None of the" and inserted, "For responsible entities." Deleted, "involved" and inserted, "involving fewer than 20 persons." Deleted, "(but not 100% of all personnel involved)," and inserted, ", three of those persons." Inserted, "For responsible entities directly involving 20 or more persons in the design and implementation of the TVMP, more than 10% up to (and including) 15% of those persons did not hold appropriate qualifications and training to perform their duties." Under Severe VSL, "One or more persons" and inserted, "For responsible entities." Deleted, "directly involved [in the design and implementation of the] Transmission Owner's TVMP held," and inserted, ", more than three of those persons did not hold." Inserted, "For responsible entities directly involving 20 or more persons in the design and				

	implementation of the TVMP, more than 15% of those persons did not hold appropriate qualifications and training to perform their duties."				
Revised R1.4.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. For Lower, Moderate, and High VSLs, deleted, "Not Applicable." Inserted, "N/A." Under Severe VSL, deleted, "Transmission Owner's" and inserted, "responsible entity's."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance	NERC compared the existing requirement 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.	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.

			Enforcement Authority.		
Revised R1.5.	The VSLs were modified for clarity, in accordance with Guidelines 2 and 3. For each VSL, deleted, "Transmission Owner" and inserted, "responsible entity." Under Severe VSL, deleted, ", or the Transmission Owner." Inserted, "OR The responsible entity."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the existing requirement VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability goal. The original language in the VSL did not indicate what process must be established or documented; the new VSL incorporates this descriptive information. In accordance with Guideline 3, the VSL assignments, as revised, are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.
Revised R2.	The VSLs were modified for clarity in accordance with Guideline 2. Under Lower, Moderate,	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated	NERC compared the existing requirement VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the	The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are

	High, and Severe VSLs, deleted, “Transmission Owner,” and inserted, “responsible entity.” Under Severe VSL, deleted, “, or the Transmission Owner.,” and inserted, “OR The responsible entity.”		VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	not based on a cumulative number of violations of the same requirement over a period of time.
Revised R3.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no	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	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.

	including specified components. Under Lower VSL, deleted, "The Transmission Owner did not submit a quarterly report to its RRO and did not have any outages to report." Inserted, "The responsible entity failed to provide a quarterly outage report, but did not experience any reportable outages. OR The responsible entity provided a quarterly report, but failed to report in the manner specified by one or more of the following subcomponents of R3: R3.1 or R3.2." Under Moderate VSL, "The Transmission Owner did not report an outage specified as reportable in R3 to its RRO The responsible entity provided a quarterly report, but failed to include information required by R3.3." Under High VSL, deleted "The Transmission Owner		changes to the VSLs 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	compliance can be determined objectively and with certainty	

	did not report multiple outages specified as reportable in R3 to its RRO." Inserted, "The responsible entity provided a quarterly outage report, but failed to include a reportable Category 3 outage as described in R3.4.3." Under Severe VSL, deleted "The Transmission Owner did not report one or more outages specified as reportable in R3 to its RRO for two consecutive quarters." Inserted, "The responsible entity experienced reportable outages but failed to provide a quarterly report. OR The responsible entity provided a quarterly outage report, but failed to include a reportable Category 1 (as described in R3.4.1) or Category 2 outage (as described in R3.4.2)."				
Revised R3.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

Revised R3.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.4.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.4.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.4.3.	Incorporated into VSL of Main Requirement.				

FAC-008-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	Consistent with Guideline 2 and the Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on including specified components. Under Lower VSL, deleted, "Not applicable." Inserted, "The responsible entity failed to include in their methodology one of the subcomponents of R1.3, (R1.3.1 to R1.3.5)." Under Moderate VSL, deleted, "Not applicable." Inserted, "The responsible entity failed to include in their methodology two of the subcomponents of R1.3, (R1.3.1 to R1.3.5)." Under High VSL, deleted, "Not applicable." Inserted, "The responsible entity rating methodology did not address either of the sub-components of R1.2 (R1.2.1 or R1.2.2). OR The responsible entity failed to	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective	NERC compared the existing requirement 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.	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.

	include in their assessment three of the subcomponents of R1.3, (R1.3.1 to R1.3.5).” Under Severe VSL, deleted, “The Transmission Owner or Generation Owner does not have a documented Facility Ratings Methodology for use in developing facility ratings.” Inserted, “The responsible entity's rating methodology failed to recognize a facility's rating based on the most limiting component rating as required in R1.1. OR The responsible entity rating methodology did not address the components of R1.2, (R1.2.1 and R1.2.2). OR The responsible entity failed to include in their methodology four or more of the subcomponents of R1.3, (R1.3.1 to R1.3.5).”		application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

Revised R1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11,		

			2009, for the purposes of clarity.		
Revised R1.3.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.5.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.	The VSLs were modified to be consistent with FERC Guideline 3,	See Guideline 1	The VSLs, as revised, comply with Guideline 2. The	In accordance with Guideline 3, NERC has revised the VSL	The VSL assignments comply with Guideline 4, because

	as well as for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, "Transmission Owner or Generator Owner has," and inserted, "responsible entity [made]." Deleted, "its," and inserted, "the." Deleted, "to all required entities but not [within]," and inserted, "more than [15 business days]." Deleted, "of," and inserted, "but less than or equal to 25 business days after [a request.]" Under Moderate VSL, deleted, "The Transmission Owner or Generator Owner has not made its Facility Ratings Methodology available to one of the required entities, but did make the methodology available to all other required entities." Inserted, "The responsible entity made the Facility Ratings Methodology available within more than 25 business days but less than or equal to 35 business days after a request." Under High VSL, deleted, "The Transmission Owner or Generator Owner fails to provide its Facility	Report.	requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	assignments because the VSL assignments either redefined or undermined the requirement. The VSLs were modified based on the number of days the entity was late making the methodology available. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

	Ratings Methodology available to two or more of the required entities." Inserted, "The responsible entity made the Facility Ratings Methodology available within more than 35 business days but less than or equal to 45 business days after a request." Under Severe VSL, Deleted, "Transmission Owner or Generator Owner has not made its." Inserted, "responsible entity failed to make available the." Deleted, "Rating," and inserted, "Ratings," Deleted, "to any of the required entities in accordance with Requirement R2 within 60," and inserted, "more than 45." Deleted, "of receipt of," and inserted, "after."				

Revised R3.	The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, "as required but took longer" and inserted, "in more [than 45]." Deleted, "business" and inserted, "calendar [days] but less than or equal to 60 calendar days after a	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The VSLs were modified based on the number of days the entity was late in providing a response or if the entity did not indicate why a change was made. As revised, the VSL	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.

	request." Under Moderate VSL, inserted, "response in more than 60 calendar days but less than or equal to 70 calendar days after a request. OR The responsible entity provided a response within 45 calendar days." Under High VSL, inserted, "in more than 70 calendar days but less than or equal to 80 calendar days after a request. OR The responsible entity provided a response within 45 calendar days." Under Severe VSL, deleted, "did not" and inserted, "failed to [provide]." Deleted, "any evidence to demonstrate that it provided [a response] to a comment on its Facility Ratings Methodology," and inserted, "as required." Deleted, "accordance with Requirement R3 within 90 business" and inserted, "more than 80 calendar [days] after a request."		Guideline 2. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	

FAC-009-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, “Transmission Owner or Generator Owner developed” and inserted, “responsible entity failed to establish.” Deleted, “for all its solely owned and jointly owned Facilities, but the ratings weren't.” Deleted, “in one minor area.” And inserted, “for 5% or less of its solely owned and jointly owned Facilities.” Under Moderate VSL, deleted, “The Transmission Owner or Generator Owner developed Facility Ratings for most, but not all of its solely and jointly owned Facilities following the associated Facility Ratings Methodology OR the Transmission Owner or Generator Owner developed Facility Ratings for all its solely and jointly owned Facilities but failed to follow the associated	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective	NERC compared the existing requirement 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.	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.

	Facility Ratings Methodology in one significant area." Inserted, "The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings Methodology for more than 5% up to (and including) 10% of its solely owned and jointly owned Facilities." Under High VSL, deleted, "Transmission Owner or Generator Owner developed" and inserted, "responsible entity failed to establish." Deleted, "following" and inserted, "consistent with." Deleted, "but failed to develop any Facility Ratings [for] a significant number," and inserted, "more than 10% up to (and including) 15%." And deleted, "and jointly owned Facilities OR the Transmission Owner or Generator Owner has developed Facility Ratings for all its solely [owned and jointly owned Facilities], but failed to follow the associated Facility Ratings Methodology in more than one significant area." Under Severe VSL, deleted, "The Transmission Owner or Generator Owner has failed to demonstrate that it developed any Facility Ratings using its Facility Rating		application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

	Methodology." Inserted, "The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings Methodology for more than 15% of its solely owned and jointly owned Facilities."				

FAC-013-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. For each VSL, deleted, "Reliability Coordinator or Planning Authority" and inserted, "responsible entity." Deleted, "but one or more Transfer Capabilities, [but] not more than 25%," inserted, "5% or less." Under Lower VSL, deleted, "not more than 25%" and inserted, "5% or less." Deleted, "not" and inserted, "in." Under Moderate VSL, deleted, "25% of those Transfer Capabilities, but not more than 50" and inserted, "5% up to (and including) 10[%]." Deleted, "not" and inserted, "in." Under High VSL, deleted, "50% of those Transfer Capabilities, but not more than 75" and inserted,	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity	NERC compared the existing requirement 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.	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.

	"10% up to (and including) 15[%]." Deleted, "not" and inserted, "in." Under Severe VSL, deleted, "75" and inserted, "15[%]."		needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R2.1.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, "Not applicable." Inserted, "The responsible entity failed to provide Transfer Capabilities to 5% or less of the required entities." Under Moderate, deleted, "Reliability Coordinator provided its, "and inserted, "responsible entity failed to provide." Deleted, "all but one" and inserted, "more than 5% up to (and including) 10%." Under High VSL, deleted, "Reliability Coordinator" and inserted, "responsible entity." Deleted, "one" and inserted, "10% up to (and including) 15%." Under Severe VSL, deleted,	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the	NERC compared the existing requirement 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.	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.

	"Reliability Coordinator provided its" and inserted, "responsible entity failed to provide." Deleted, "none" and inserted, "more than 15%."		consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R2.2.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, "Not applicable." Inserted, "The responsible entity failed to provide Transfer Capabilities 5% or less of the required entities." Under Moderate, deleted, "Reliability Coordinator provided its, "and inserted, "responsible entity failed to provide." Deleted, "all but one" and inserted, "more than 5% up to (and including) 10%."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs 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	NERC compared the existing requirement 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.	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.

	Under High VSL, deleted, "Reliability Coordinator" and inserted, "responsible entity." Deleted, "one" and inserted, "10% up to (and including) 15%." Under Severe VSL, deleted, "Reliability Coordinator provided its" and inserted, "responsible entity failed to provide." Deleted, "none" and inserted, "more than 15%."		objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

INT-003-2 R#	Explanation of Changes	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 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	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
Revised R1	The VSLs were modified to be consistent with Guideline 4. Consistent with Guideline 2 and the Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, deleted, "There shall be a separate Lower VSL, if either of the following conditions exists: One instance of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has VSLs that are based on completing specific actions or meeting specific thresholds specified in the requirement or subrequirements. It is not binary in nature. Therefore, Guideline 2a is not applicable. The VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Therefore, no changes to the VSLs were required for consistency with FERC	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.	In accordance with Guideline 4, NERC has revised the VSLs because the VSLs were based on multiple violation occurrences when not permitted by the requirement language. The "number of instances" language was removed and language based on the requirement and subrequirements was substituted as shown. The revisions were necessary to make clear that the VSL assignments are based on a single violation of a Reliability Standard and are not based on a cumulative number of

	R1.1.2. One instance of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2." Inserted, "N/A." Under Moderate VSL, inserted, "The responsible entity confirmed Interchange Schedule with the Sending Balancing Authority," and deleted, "There shall be a separate Moderate VSL, if either of the following conditions exists: Two instances of entering a schedule into its [ACE equation] without confirming the schedule as specified in R1, R1.1, R1.1.1 [and] R1.1.2. Two instances of not coordinating the," inserted, "the responsible Entities reached agreement; and coordinated [the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2]; but the agreement did not include one of the elements required in sub-requirements R1.1.1 or R1.1.2." Under High VSL, "There shall be a separate High VSL, if either of the following conditions exists: Three instances of entering a schedule into its," and inserted, "The responsible entity confirmed Interchange Schedule with the Sending Balancing Authority prior to implementation in the Balancing Authority." Deleted, "[ACE		Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		violations of the same requirement over a period of time.

	equation] without confirming the schedule as specified in R1, R1.1, R1.1.1," and inserted "[and] R1.1.2. Three instances of not coordinating coordinate," and inserted, "the responsible Entities reached agreement but did." Under Severe VSL, deleted, "There shall be a separate Severe VSL, if either of the following conditions exists: Four or more instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2. Four or more instances of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2." Inserted, "The responsible entity failed to confirm Interchange Schedule with the Sending Balancing Authority prior to implementation in the Authority's ACE equation. OR The responsible entity failed to agree on the interchange as received from the Interchange Authority prior to implementation in the Balancing Authority's ACE equation."				
Revised R1.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2,		

			and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

INT-004-2 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R2	The VSLs were modified to be consistent with Guideline 4. Consistent with Guideline 2 and the Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, deleted, "The Purchase-Selling entity failed to update the tags when required less than 25% of times it was required, as determined in R2.1, R2.2, or R2.3." Inserted, "N/A." Under Moderate VSL, deleted, "The Purchase-Selling entity failed to update the tags when required 25% or more and less than 50% of the times it was required, as determined in R2.1, R2.2, or R2.3." Inserted, "N/A." Under High VSL, deleted, "Purchase-Selling" and inserted, "responsible." Deleted, "50% or more but less than75% of the times it was required, as determined in" and inserted, "by sub-requirements [R2.1] or" and deleted, "or R2.3."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has VSLs that are based on completing specific actions or meeting specific thresholds specified in the requirement or subrequirements. It is not binary in nature. Therefore, Guideline 2a is not applicable. The VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Therefore, no changes to the VSLs were required for consistency with FERC Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance	NERC compared the revised 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.	In accordance with Guideline 4, NERC has revised the VSLs because the VSL was based on multiple occurrences when not permitted by the requirement language.

	Under Severe VSL, deleted, "Purchase-Selling" and inserted, "responsible." Deleted, "75% or more of the times it was required, as determined in R2.1, R2.2, or" and inserted, "by sub-requirement."		Enforcement Authority.		
Revised R2.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.3	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

INT-005-3 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.1	The VSLs were modified to be consistent with FERC. Guideline 4. Under Lower VSL, deleted, "The Interchange Authority experienced one occurrence of not distributing information to all involved reliability entities." Inserted, "N/A." Under Moderate VSL, deleted, "The Interchange Authority experienced two occurrences of not distributing information to all involved reliability entities." Inserted, "N/A." Under High VSL, "The Interchange Authority experienced three occurrences of not distributing information to all involved reliability entities." Inserted, "The Responsible Entity initiated a Curtailment to Confirmed or Implemented Interchange for reliability but the Interchange Authority failed to distribute the Arranged Interchange information to the Source Balancing Authority or the Sink Balancing Authority." Under Severe VSL, deleted, "The Interchange Authority experienced four occurrences of not distributing	See Guideline 1 Report.	The requirement has multiple levels of VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as revised, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the revised 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, the degree of compliance can be determined objectively and with certainty.	In accordance with Guideline 4, NERC has revised the VSLs because the VSLs were based on multiple violation occurrences when not permitted by the requirement language. The number of occurrences was removed and the VSL based upon the failure to distribute the Arranged Interchange information to the Source Balancing Authority and the Sink Balancing Authority.

	information to all involved reliability entities." Inserted, "The Responsible Entity initiated a Curtailment to Confirmed or Implemented Interchange for reliability but the Interchange Authority failed to distribute the Arranged Interchange information to the Source Balancing Authority and the Sink Balancing Authority."				

INT-009-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1	The VSLs were modified to be consistent with Guidelines 2 and 4. Under Lower VSL, deleted, "The Balancing Authority experienced one occurrence of not implementing a Confirmed Interchange as received from the Interchange Authority." Inserted, "N/A." Under Moderate VSL, deleted, "The Balancing Authority experienced two occurrences of not implementing a Confirmed Interchange as received from the Interchange Authority." Inserted, "N/A." Under High VSL, deleted, "The Balancing Authority experienced three occurrences of not implementing a Confirmed Interchange as received from the	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe level. Such change is consistent with the Commission's June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements.	NERC compared the requirement 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.	In accordance with Guideline 4, NERC has revised the VSLs because the VSLs were based on multiple violation occurrences when not permitted by the requirement language. The number of occurrences was removed and the VSLs were based upon failure to implement a Confirmed Interchange as received from the Interchange Authority. The revisions to the VSL made it binary. These revisions were necessary to make it clear that the VSL assignments 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.

	Interchange Authority.” Inserted, “N/A.” Under Severe VSL, deleted, “Balancing Authority experienced four occurrences of not implementing,” and inserted, “responsible entity failed to implement.”				

INT-010-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1	The VSLS were modified to be consistent with FERC Guidelines 2 and 4. For each VSL, deleted, "The Balancing Authority" and inserted, "responsible entity," and deleted, "resource" and inserted, "resources that exceeded 60 minutes and was," and deleted, "failed one time to submit," and inserted, "ensured that." Additionally, for each VSL, edited range of minutes for specific compliance determinations.	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has multiple levels of VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as revised, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the revised 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.	In accordance with Guideline 4, NERC has revised the VSLs because the VSLs were based on multiple violation occurrences when not permitted by the requirement language. The number of occurrences was removed and the VSLs were based upon the start time beyond the resource loss upon which the entity submitted a request for Arranged Interchange. The revisions were necessary to make clear that the VSL assignments 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.
Revised R2	The VSLs were modified to be consistent with Guidelines 2 and 4.	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary	NERC compared the revised VSLs to the stated requirement language to	In accordance with Guideline 4, NERC has revised the VSLs because the VSLs were

	Deleted VSLs for Lower, Moderate, and High levels, and inserted, "N/A." Under Severe VSL, deleted, "The Reliability Coordinator failed four times to direct the submittal of a new or modified Arranged Interchange; or the Balancing Authority failed four times to submit the modified schedule as directed." Inserted, "The responsible entity failed to direct a Balancing Authority to submit the modified Arranged Interchange reflecting the modification, within 60 minutes of the initiation of the event."		requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe level. Such change is consistent with the Commission's June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements.	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.	based on multiple violation occurrences when not permitted by the requirement language. The number of occurrences was removed and the VSL was made binary based on the responsible entity failure to direct a Balancing Authority to submit the modified Arranged Interchange reflecting that modification within 60 minutes of the initiation of the event. The revisions were necessary to make clear that the VSL assignments 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.
Revised R3	The VSLs were modified to be consistent with Guidelines 2 and 4. Deleted VSLs for Lower, Moderate, and High levels, and inserted, "N/A." Under Severe VSL, deleted, "The Reliability Coordinator failed four times to direct the submittal of a new or modified Arranged Interchange; or the Balancing Authority failed four times or more to submit a schedule as directed." Inserted, "The responsible entity	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe level. Such change is consistent with the Commission's June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements.	NERC compared the 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.	In accordance with Guideline 4, NERC has revised the VSLs because the VSLs were based on multiple violation occurrences when not permitted by the requirement language. The number of occurrences was removed and the VSL was made binary based on the responsible entity's failure to direct a Balancing Authority to submit an Arranged Interchange reflecting the new Interchange schedule within 60 minutes of the

	failed to direct a Balancing Authority to submit an Arranged Interchange reflecting the new Interchange schedule within 60 minutes of the initiation of the event.”				initiation of the event. The revisions were necessary to make clear that the VSL assignments 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.

IRO-001-1.1 R#	Explanation of Changes	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 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	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
Revised R5	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. For each VSL, corrected formatting, and edited range of percentage values for each VSL assignment level, consistent with the intent of the Reliability Standard.	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective	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.	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.

			language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority		
Revised R6	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. For each VSL level, corrected formatting to eliminate a second component. Under the Lower VSL, deleted, "N/A." Inserted, "The Reliability Coordinator failed to demonstrate that 5% or less of its delegated tasks were being performed by NERC certified Reliability Coordinator operating personnel."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2a. 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.	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.	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.

	Under Moderate VSL, deleted, “1” and “has.” Deleted, “at least one,” and inserted, “that more than 5% up to (and including) 10% of its.” Deleted, “task was,” and inserted, “tasks were being.” Deleted, “or 2. The Reliability Coordinator did not require the delegate entity to have NERC certified Reliability Coordinator operating personnel.” Under High VSL, deleted, “1” and “has.” Deleted, “at least one” and inserted, “that more than 10% up to (and including) 15% of its.” And deleted, “task was performed by NERC certified Reliability Coordinator operating personnel and did not require the delegate entity to have NERC certified Reliability Coordinator operating personnel or 2. The Reliability Coordinator has failed to demonstrate at least two delegated task,” and inserted, “tasks [were]		Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

	being." Under Severe, deleted, "has" and "any" and inserted, "that more than 15% of its." Inserted, "being" and "and did not require the delegate entity to have NERC certified Reliability Coordinator operating personnel."				
Revised R8	The VSLs were modified to be consistent with FERC Guideline 3, and for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, "Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities followed the Reliability Coordinators directive with a delay not caused by equipment problems but did notify the Reliability Coordinator	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs 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	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. Responsible Entities are required to comply with Reliability Coordinator directives, or inform the Reliability Coordinator if they cannot. The VSLs were modified to reflect two conditions; one where they did not notify the RC and one where they did not follow the directive. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and	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.

	of the delay." Inserted, "N/A." Under Moderate VSL, deleted, "Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities followed the Reliability Coordinators directive with a delay not caused by equipment problems and did not notify the Reliability Coordinator of the delay." Inserted, "The responsible entity could not comply with a directive due to qualified reasons (violation of safety, equipment or regulatory or statutory requirements) and did not immediately inform the Reliability Coordinator." Under High VSL, deleted, "Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving		contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	with certainty.	

	Entities, and Purchasing-Selling Entities followed the majority of the Reliability Coordinators directive and did not notify the Reliability Coordinator that it could not fully follow the directive because it would violate safety, equipment, statutory or regulatory requirements." Inserted, "N/A." Under Severe VSL, deleted, "Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities." Inserted, "The responsible entity." And deleted, "and did not notify the Reliability Coordinator that it could not follow the directive because it would violate safety, equipment, statutory or regulatory requirements."				

R9	*No changes*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

IRO-002-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1	The VSLs were modified to be consistent with FERC Guidelines 2 and 3, as well as for clarity and consistency with other standards and VSLs. Lower, Moderate, and High VSLs edited to state Reliability Coordinator, "has adequate voice [communication facilities]." Also, inserted specific ranges or percentages for each level of VSL. Under Lower VSL, deleted, "has," and inserted, "that it has adequate voice." Deleted, "for both voice [and] data exist to all," and inserted, "staff but is deficient by 5% or less of its needed data links for at least one of the." Deleted, "and that they are staffed and available but they are less than adequate." Inserted, "within its Reliability Coordinator Area."	See Guideline 1 Report.	NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because each Reliability Coordinator is required to have adequate communications facilities (voice and data links) to appropriate entities within its Reliability Coordinator Area and the communications facilities are required to be staffed and available to act in addressing a real-time emergency condition. The revised text clarifies the VSLs by removing language not contained in the requirement. Therefore, the revised VSLs eliminate the possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The VSLs were modified to better reflect the language contained in the requirement that each Reliability Coordinator maintain adequate communication facilities and staffing. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

	Under Moderate VSL, deleted, “has failed to demonstrate,” and inserted, “demonstrated.” Deleted, “ is has: 1) Voice,” and inserted, “it has adequate voice.” Inserted, “facilities and staff but is deficient with more than 5% up to (and including) 10% of its needed data.” Deleted, “with” and inserted, “for at least.” Inserted, “of the,” and inserted, “entity or 2) Data links with one appropriate entity.” Inserted, “entities within its Reliability Coordinator Area.” Under High VSL, deleted, “has failed to demonstrate,” and inserted, “demonstrated.” Deleted, “ is has: 1) Voice,” and inserted, “it has adequate voice.” Inserted, “facilities and staff but is deficient for more than 10% up to (and including) 15% of its needed data.” Deleted, “with two” and		Authority.		

	inserted, “for at least one of the.” Deleted, “or 2) Data links with two appropriate entities.” Inserted, “within its Reliability Coordinator Area.” Under Severe VSL, deleted, “The Reliability Coordinator has failed to demonstrate that is has: 1) Voice communication links with more than two appropriate entities or 2) Data links with more than two appropriate entities or 3) Communication facilities are not staffed or 4) Communication facilities are not ready.” Inserted, “The Reliability Coordinator demonstrated that it has adequate voice communication facilities and staff but is deficient for more than 15% of its needed data links for at least one of the appropriate entities with which it interfaces. OR The Reliability Coordinator demonstrated that it has				

	adequate voice and data communications facilities with all appropriate entities within its Reliability Coordinator Area but failed to have sufficient staff to address a real-time emergency event. OR The Reliability Coordinator failed to demonstrate it has adequate voice communications facilities with appropriate entities within its Reliability Coordinator Area."				
Revised R2	The VSLs were modified to be consistent with FERC Guidelines 2 and 3. VSLs edited to remove ambiguous language and to specify the requirement for the Reliability Coordinator to determine the data requirements to support its reliability coordination tasks and request such data from its responsible entities.	See Guideline 1 Report.	NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because they contained the words "some but less than the majority" or "majority". The revised text clarifies the VSLs by removing such language. Therefore, the revised VSLs eliminate the possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The VSLs were reworded to specify the requirement for the Reliability Coordinator to determine the data requirements to support its reliability coordination tasks and request such data from its responsible entities. As revised, the VSL assignments are consistent	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.

			consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	with the requirement and the degree of compliance can be determined objectively and with certainty.	
Revised R3	The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, "N/A." Inserted, "The responsible entity failed to demonstrate it provided or arranged provision for the exchange of data with 5% or less of the other Reliability Coordinators or Transmission Operators and Balancing Authorities." Under Moderate, High and Severe VSLs, deleted, "Reliability Coordinator or designated Transmission Operator and Balancing Authority has" and inserted, "responsible entity." In addition, for each VSL, the percentages were modified to be consistent with the	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSL sand provides the clarity needed to permit the consistent and objective	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The VSLs were modified to better reflect the language in the requirement by removal of the word "has." As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

	intent of the standard.		application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R4	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under the Lower VSL, deleted, "N/A." Inserted, "The Reliability Coordinator has failed to demonstrate multi-directional communication capabilities to 5% or less of the applicable entities with which it interfaces." Under the Moderate and High VSLs, percentages were modified to be consistent with the intent of the standard. Deleted, "Transmission Operators and Balancing Authorities in its Reliability Coordinator Area and neighboring Reliability Coordinators." and inserted, "applicable entities which it interfaces." Under Severe VSL, deleted,	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

	"Transmission Operators and Balancing Authorities in its Reliability Coordinator Area and with all neighboring Reliability Coordinators." Inserted, "applicable entities with which it interfaces."				
Revised R5	The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, inserted, "SOL/IROL." Deleted, "or particular emphasis was not given to alarm management and awareness systems, automated data transfers and synchronized information systems." Under Moderate VSL, deleted, "The Reliability Coordinator has failed to demonstrate that is has detailed real-time monitoring capabilities in its Reliability Coordinator Area and sufficient monitoring	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The VSLs were modified to identify the specifics of the requirement, including alarm management and awareness systems, automated data transfers, and synchronized information systems, over a redundant and highly reliable infrastructure. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

	capabilities of its surrounding Reliability Coordinator Areas to ensure that one potential or actual SOL or IROL violation is not identified." Inserted, "The Reliability Coordinator's SOL/IROL monitoring systems did not give particular emphasis to One of the following: • alarm management and awareness systems • automated data transfers • synchronized information systems" Under the High VSL, deleted, "The Reliability Coordinator has failed to demonstrate that is has detailed real-time monitoring capabilities in its Reliability Coordinator Area and sufficient monitoring capabilities of its surrounding Reliability Coordinator Areas to ensure that two or more potential and actual SOL and IROL violations are not identified." Inserted, "The Reliability Coordinator's SOL/IROL monitoring		consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

	systems did not give particular emphasis to Two of the following: • alarm management and awareness systems • automated data transfers • synchronized information systems” Under Severe VSL, deleted, “The Reliability Coordinator has failed to demonstrate that is has detailed real-time monitoring capabilities in its Reliability Coordinator Area and sufficient monitoring capabilities of its surrounding Reliability Coordinator Areas to ensure that all potential and actual SOL and IROL violations are identified.” Inserted, “The Reliability Coordinator's SOL/IROL monitoring systems did not give particular emphasis to any of the following: R1. alarm management and awareness systems R2. automated data transfers R3. synchronized information systems.				

	OR The Reliability Coordinator's SOL/IROL monitoring systems were not implemented over a highly reliable redundant infrastructure.”				
Revised R7	The VSLs were modified to be consistent with FERC Guidelines 2 and 3. Under Lower VSL, deleted, “The Reliability Coordinator failed to demonstrate that it has: 1) analysis tools capable of assessing all pre-contingency flows, 2) analysis tools capable of assessing all post-contingency flows, or 3) all necessary wide-area overview displays exist.” Inserted, “N/A” Under Moderate VSL, deleted, “The Reliability Coordinator failed to demonstrate that it has: 1) analysis tools capable of assessing the majority of	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe level. Such change is consistent with the Commission’s June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements.	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The VSL was modified to include the list of adequate analysis tools that each Reliability Coordinator must have, as defined in the requirement. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty	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.

	pre-contingency flows, 2) analysis tools capable of assessing the majority of post-contingency flows, or 3) the majority of necessary wide-area overview displays exist." Inserted, "N/A." Under High VSL, deleted, "The Reliability Coordinator failed to demonstrate that it has: 1) analysis tools capable of assessing a minority of pre-contingency flows, 2) analysis tools capable of assessing a minority of post-contingency flows, or 3) a minority of necessary wide-area overview displays exist." Inserted, "N/A." Under Severe VSL, deleted, ": 1)" and inserted, "adequate." Deleted, "capable of assessing any pre-contingency flows, 2) analysis tools capable of assessing any post-contingency flows, or 3) any necessary wide," and inserted, "such as:				

	1. State estimation 2. Pre-contingency analysis capability (thermal, stability, and 3. voltage); 4. Post-contingency analysis capability (thermal, stability, and voltage), 1.5. Wide[-area overview displays].” Deleted, “exist.”				
Revised R8	The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, “The Reliability Coordinator failed to demonstrate that: 1) it or a delegated entity monitored SOLs when the main monitoring system was unavailable or 2) it has provisions to monitor SOLs when the main monitoring system is not available.” Inserted, “N/A.” Under Moderate VSL,	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The VSLs were modified to better reflect the requirement language that the Reliability Coordinator must continuously monitor its Reliability Coordinator Area, have provisions for backup facilities that shall be exercised if the main monitoring system is unavailable, and ensure SOL and IROL monitoring and derivations continue if the main monitoring system is unavailable. Revised to Moderate and Severe VSLs,	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.

	"failed to demonstrate that: 1) it or a delegated entity monitored one IROL," and inserted, "demonstrated provisions for back-up facilities, but it failed to continuously monitor SOL/IROL conditions." And deleted, "or 2) it has provisions to monitor one IROL when the main monitoring system is not available." Under High VSL, deleted, "The Reliability Coordinator failed to demonstrate that: 1) it or a delegated entity monitored two or more IROLs when the main monitoring system was unavailable, 2) it or a delegated entity monitored SOLs and one IROL when the main monitoring system was unavailable 3) it has provisions to monitor two or more IROLs when the main monitoring system is not available, or 4) it has provisions to monitor SOLs and one IROL when the main monitoring		needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	eliminating Lower and High VSLs. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	

	system was unavailable." Inserted, "N/A." Under Severe VSL, deleted, "that it continuously monitored its Reliability Authority Area," and inserted, "provisions for back-up facilities AND The Reliability Coordinator failed to continuously monitor SOL/IROL conditions when the main monitoring system was unavailable."				

IRO-004-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
R1.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by	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.	The VSL assignments comply with Guideline 4, because the current Levels of Non-Compliance expressly provides that a violation of the Requirement is based on a cumulative number of violations of the same requirement over a period of time. NERC will modify this requirement to reflect these measurement criteria more accurately in the future.

			the Compliance Enforcement Authority.		
Revised R2.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Severe VSL, deleted, “does” and inserted, “did.”	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

R3.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	The VSL assignments comply with Guideline 4, because the current Levels of Non-Compliance expressly provides that a violation of the Requirement is based on a cumulative number of violations of the same requirement over a period of time. NERC will modify this requirement to reflect the measurement criteria more accurately in the future.

R4.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	The VSL assignments comply with Guideline 4, because the current Levels of Non-Compliance expressly provides that a violation of the Requirement is based on a cumulative number of violations of the same requirement over a period of time. NERC will modify this requirement to reflect the measurement criteria more accurately in the future.
R5.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore,	NERC compared the existing VSLs to the stated requirement language to	The VSL assignments comply with Guideline 4, because the current Levels of Non-

			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 to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	Compliance expressly provides that a violation of the Requirement is based on a cumulative number of violations of the same requirement over a period of time. NERC will modify this requirement to reflect the measurement criteria more accurately in the future.
Revised R6.	The VSLs were modified to be consistent with FERC Guidelines 2 and 4. Deleted Lower, Moderate, and High VSL, and	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at	NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability	In accordance with Guideline 4, NERC has revised the VSLs, because the VSLs were based on multiple violation occurrences when not permitted by the

	inserted, “N/A.” Under, Severe VSL, deleted, “on more than five (5) occasions during” and inserted, “when the results of its studies indicated.” Deleted, “calendar month.” Inserted, “potential SOL or IROL violation.”		the Severe level. Such change is consistent with the Commission’s June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements.	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.	requirement language. The revisions were necessary to make clear that the VSL assignments 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.
Revised R7.	The VSLs were modified to be consistent with FERC Guidelines 2 and 4. Deleted Lower, Moderate, and High VSL, and inserted, “N/A.” Under Severe VSL, deleted, “directives of” and inserted, “directive from.” And deleted, “on more than five (5) occasions during a calendar month.”	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe level. Such change is consistent with the Commission’s June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements.	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.	In accordance with Guideline 4, NERC has revised the VSLs, because the VSLs were based on multiple violation occurrences when not permitted by the requirement language. The revisions were necessary to make clear that the VSL assignments 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.

IRO-005-2 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
R2.	*No changes*.	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement	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.	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.

			Authority.		
R3.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement	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.	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.

			Authority.		
R4.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement	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.	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.

			Authority.		
R5.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

R6.	*No changes*.	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

R7.	*No changes*.	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.
R10.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single	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	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

			VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	Guideline 3, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	violations of the same requirement over a period of time.
R11.	*No changes*.	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for	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.	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.

			consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R12.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Severe VSL, deleted, “is” and inserted “was.” Deleted, “or the” and inserted, “. OR The.”	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, with the correction of	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.	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.

			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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R13.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Severe VSL, deleted, “shall.” Deleted, “or the” and inserted, “. OR The.”	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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	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.	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.

			clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R14.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Severe VSL, deleted, “, or the” and inserted, “. OR The.”	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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	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.	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.

			subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R15.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Moderate VSL, inserted “and.” Under Severe VSL, deleted, “or the” and inserted, “. OR The.”	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. 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.	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.	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.

			Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R16.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under High VSL, deleted, “determine,” and inserted “determined.” Under Severe VSL, deleted, “shall.” Deleted, “.” and inserted, “. OR The Reliability Coordinat[or].”	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. 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. Therefore, the text is not	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.	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.

			subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R17.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Severe VSL, deleted, “, or the” and inserted, “. OR The.”	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the	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.	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.

			clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

IRO-006-4.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
R2	*No changes.*	.See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Thus, no changes to the VSLs were required. 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.	NERC reviewed the existing requirement 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 assignment(s) are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

R3	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Thus, no changes to the VSLs were required. 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.	NERC reviewed the existing requirement 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 assignment(s) are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

IRO-014-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
R1.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

Revised R1.1.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, "The Reliability Coordinator failed to include one of the elements listed in IRO-014-1 R1.1.1 through R1.1.6 in there Operating Procedures, Processes, or Plans." Inserted, "N/A." Under Moderate VSL, deleted, "two" and inserted, "one." Deleted, "there," and inserted, "its." Under High VSL, deleted, "more than." Deleted, "there," and inserted, "its." Under Severe VSL, deleted, "N/A." Inserted, "The Reliability Coordinator failed to include more than two of the elements listed in IRO-014-1 R1.1.1 through R1.1.6 in its Operating Procedures, Processes, or	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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	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.

	Plans..				
Revised R1.1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.5.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2,		

			and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.6.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R4.	Consistent with Guideline 2 and the Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Moderate VSL, deleted, "N/A" and inserted, "The Operating Procedures, Processes and Plans did not include one of the elements listed in IRO-014-1 R4.1 through R4.3." Under High VSL, deleted, "N/A." Inserted, "The Operating Procedures, Processes and Plans did not include two of the elements	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. A prior use of a binary VSL was removed to provide a level of gradation. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. 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. Therefore, the text is not subject to the	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	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.

	listed in IRO-014-1 R4.1 through R4.3." Under Severe VSL, deleted, "Reliability Coordinator developed an [Operating Procedure], Process, or Plan in accordance with IRO-014 Requirement 1." Inserted, "[Procedure]s, Processes [and] Plans did not include **any**." Deleted, "Requirement 3, but failed to comply with one."		possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R4.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R4.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R4.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of		

			clarity.		

IRO-015-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
R3.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

MOD-006-0.1 R#	Explanation of Changes	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 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	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
Revised R1.	The VSLs were modified for clarity and to use higher performance percentages for consistency with other standards and VSLs, in accordance with Guideline 2. Revisions also were made with respect to the Guidelines filed with FERC on August 11, 2009, for the purposes of clarity. Under Lower, Moderate, High, and Severe VSLs, deleted, “The Transmission	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined	NERC compared the existing requirement 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.	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.

	Service Provider," and inserted, "responsible entity." Also, under High VSL, deleted, "or" and inserted, "and."		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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core		

			requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

MOD-007-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1	The VSLs were modified for clarity and to use higher performance percentages for consistency with other standards and VSLs, in accordance with Guidelines 2 and 3. Under Moderate VSL, deleted, “Each Transmission Service Provider that uses CBM reported (to the Regional Reliability Organization, NERC and the transmission users) the use of CBM by the Load-Serving Entities’ Loads on its system but failed to use CBM that is consistent with the Transmission Service Provider’s procedure for use of CBM. Inserted, “The responsible entity uses CBM and failed to report the use of CBM to one (1) of the following: Regional Reliability Organization, NERC or transmission users.” Under High VSL, deleted,	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The VSLs focus on the number of entities the applicable entity failed to supply its CBM data to, in order to be consistent with the requirements. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

	"N/A." Inserted, "The responsible entity uses CBM and failed to report the use of CBM to two (2) of the following: Regional Reliability Organization, NERC or transmission users." Under Severe VSL, deleted, "Each Transmission Service Provider that," Inserted, "The responsible entity [uses CBM] and." Deleted, "(" and inserted "the use of CBM." Deleted "the" and inserted "all of the following:" Deleted "the" and ") the use of CBM by the Load Serving Entities' Loads on its system."				

MOD-016-1.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified to be consistent with FERC Guidelines 2 and 3.	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a	In accordance with Guideline 3, NERC has revised the VSL assignments because the	The VSL assignments comply with Guideline 4, because the requirement expressly provides that a violation of the

	For Moderate and High, VSLs, deleted, “Planning Authority and Regional Reliability Organization has,” and inserted, “responsible entity did not have. Deleted, “but failed to have documentation identifying the scope data and details.” In addition, bullet points were inserted and capitalization errors corrected. Under Severe VSL, deleted, “Planning Authority and Regional Reliability Organization has failed to” and inserted, “responsible entity did not.”		is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	VSL assignments either redefined or undermined the requirement. The VSLs were reformatted to include bullet points of the required elements, in order to align with the language in the requirements. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	Reliability Standard is based on a cumulative number of violations of the same requirement over a period of time.
Revised R1.1	The VSLs were modified to be consistent with Guideline2 and 3. Under Lower, Moderate, High, and Severe VSLs, deleted, “Planning Authority and Regional Reliability Organization” and	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The VSLs were reformatted to align	The VSL assignments comply with Guideline 4, because the requirement expressly provides that a violation of the Reliability Standard is based on a cumulative number of violations of the same requirement over a period of

	inserted, “responsible entity.” Also changed percentages into numbers.		Standards in the determination of penalties. On that basis, no changes to the VSLs were required. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	with the language in the requirements and based on number of reliability Standards in which consistent data is not supplied. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	time.
Revised R3.	The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity, in accordance with Guideline 2. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. VSLs were revised to be gradated between all four levels as opposed to the	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.

	compliance is based on meeting criteria specified in components. Under Lower VSL, deleted "N/A" and inserted "The responsible entity failed to distribute its documentation required in Requirement R1 and any changes to that documentation to 5% or less of all Transmission Planners and Load-Serving Entities that work within its Region. OR The responsible entity distributed the documentation more than 30 calendar days but less than or equal to 40 calendar days following approval." Under Moderate VSL, deleted "N/A" and inserted "The responsible entity failed to distribute its documentation required in Requirement R1 and any changes to that documentation to more than 5% up to (and including) 10% of all Transmission Planners and Load-Serving Entities that work within its Region. OR The responsible entity made the distribution more than 40 calendar days but less than or		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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	original 2 levels and the subrequirements were incorporated into VSL of Main Requirement in order to be consistent with the requirement. The VSLs include wording focused on how late the documentation was distributed. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	

	equal to 50 calendar days following approval” Under High VSL, deleted “Planning Authority distributed its documentation as specified in R1 for reporting customer data but,” and inserted “responsible entity.” Inserted “its documentation required in Requirement R1 and” and deleted “its” and inserted “more than 10% up to (and including) 15% of all.” Deleted “Planning Authority Area,” and inserted “Region. OR The responsible entity made the distribution more than 50 calendar days but less than or equal to 60 calendar days following approval.” Under Severe VSL, deleted “Planning Authority,” and inserted “responsible entity,” and “Requirement.” Deleted “for reporting customer data [to] its” and inserted “more than 15% of all,” and deleted “Planning Authority Area.” Inserted “Region. OR The responsible entity failed to make the distribution more than				

	60 calendar days following approval.”				
Revised R3.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

MOD-017-0.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified for clarity. Consistent with Guideline 2 and the Guidelines filed with FERC on August 11, 2009, the NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in the components. Under Lower, Moderate, High, and Severe VSL deleted "The Load-Serving Entity, Planning Authority, and Resource Planner" and inserted "responsible entity." Under Lower VSL, inserted "(1)." Under Moderate VSL, inserted ""(2)." Under High VSL, inserted "(3)" Under Severe VSL, deleted "or" and inserted "and.'	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2. Additionally, NERC has reviewed the VSL text and has determined that, as revised, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the revised VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the existing requirement 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.	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.

Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

MOD-018-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified for clarity. Consistent with Guideline 2 and the Guidelines filed with FERC on August 11, 2009, the NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under the Moderate, High, and Severe VSLs, deleted, "Load-Serving Entity, Planning Authority, Transmission Planner and Resource Planner" and inserted, "responsible entity's report." In addition, deleted, "report" and inserted, "include." Deleted, "report all," and inserted, "include any."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by	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.	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.

			the Compliance Enforcement Authority.		
Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

MOD-021-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2.	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated	NERC compared the existing requirement VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability goal.	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

	Under each VSL assignment, deleted, “Load-Serving Entity, Transmission Planner, and Resource Planner’s” and inserted, “The responsible entity’s.”		VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	violations of the same requirement over a period of time.
Revised R2.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Severe VSL, deleted, “Load-Serving Entity, Transmission Planner, and Resource Planner” and inserted,	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary (pass/fail) requirements, satisfying	NERC compared the existing requirement 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	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.

	"responsible entity." Also changed, "measures" into "measure(s)."		Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	requirement and the degree of compliance can be determined objectively and with certainty.	

NUC-001-2 R#	Explanation of Changes	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 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	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
Revised R1	The VSLs were modified to be consistent with FERC Guideline 3. Under Lower VSL, deleted, “did not verify receipt of the proposed,” and inserted, “provided the [NPIR's] to the applicable entities but did not verify receipt.” Under Moderate VSL, deleted, “submitted an incomplete,” and inserted, “did not provide the.” Inserted, “one of.” Deleted, “transmission.”	See Guideline 1 Report.	The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required. Additionally, NERC has reviewed the VSL text and has determined that, as modified in accordance with	As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty. The lower VSL was reworded to clarify the NPIR receipt verification requirement and establish a basis for the higher level VSL.	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.

	Under High VSL, deleted, “some,” and inserted, “two of the.” Under Severe VSL, deleted, “any,” and inserted, “more than two of.”		Guideline 3, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R2	The VSLs were modified to be consistent with FERC Guidelines 2 and 3. Under Severe VSL, inserted, “mutually agreed to.”	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe category level. Such change is consistent with the Commission’s June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements.	As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty. The VSL wording was revised to include the exact wording in the Requirement.	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.
Revised R3	The VSLs were modified to be consistent with FERC Guideline 3.	See Guideline 1 Report.	The requirement has gradated VSLs; therefore, Guideline 2a is not	In accordance with Guideline 3, NERC has revised the VSL assignments	The VSL assignments comply with Guideline 4, because they are based on a single violation

	Under Lower VSL, deleted, "The applicable Transmission Entity incorporated the NPIRs into its planning analyses and identified no areas of concern but it did not communicate these results to the Nuclear Plant Generator Operator." Inserted, "N/A." Under Moderate VSL, deleted, "applicable Transmission E[ntity]," and inserted, "responsible e[ntity]." Deleted, "analyses and identified one or more areas of concern." Under High VSL, deleted, "The applicable Transmission Entity did not incorporate the NPIRs into its planning analyses of the electric system." Inserted, "N/A." Under Severe VSL, deleted, "The responsible entity did not incorporate the NPIRs into its planning analyses of the electric system." Inserted, "N/A."		applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	because the VSL assignments either redefined or undermined the requirement. The VLS as written established two levels of communication, which was not specified in the requirement. Therefore this communications element of the requirement was revised and elevated to the higher VSL. In addition, the VSL associated with noncompliance with the requirement was increased to Severe, which is consistent with the binary discussion in Guideline 2.	of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.
Revised R5	The VSLs were modified to be consistent with FERC Guidelines 2 and 3. Under Lower VSL, deleted, "The Nuclear Operator failed to operate the plant in accordance with one or	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe category level.	NERC reviewed the existing requirement VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability goal. The original VSLs established compliance	The VSL assignments comply with Guideline 4, because the requirement expressly provides that a violation of the Reliability Standard is based on a cumulative number of violations of the same requirement over a period of

	more of the administrative or training elements within the agreements." Inserted, "N/A." Under Moderate VSL, deleted, "The Nuclear Operator failed to operate the plant in accordance with one or two of the technical, operations, and maintenance or communication elements within the agreements." Inserted, "N/A." Under High VSL, "The Nuclear Operator failed to operate the plant in accordance with three or more of the technical, operations, and maintenance or communication elements within the agreements." Inserted, "N/A." Under Severe VSL, deleted, "N/A." Inserted, "The Nuclear Plant Generator Operator failed to operate per the Agreements developed in accordance with this standard."		Such a change is consistent with the Commission's June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements. The original VSLs were based on failure to meet one or more agreement requirements. This was inconsistent with requirement wording. and resulted in the requirement becoming binary.	requirements, which were not stated in requirement R5, which upon further evaluation was determined to be a binary requirement. In accordance with Guideline 3, the revised VSL assignment is consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	time.
R9	*No changes.*	See Guideline 1 Report	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. Therefore, the text is not subject to the possibility of	NERC reviewed the existing requirement 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	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.

			multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	degree of compliance can be determined objectively and with certainty.	
Revised R9.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.1.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.1.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.1.3	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes		

			of clarity.		
Revised R9.1.4	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.2.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.2.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.2.3	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11,		

			2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.3	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.3.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.3.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.3.3	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.3.4	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2		

			and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.3.5	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.3.6	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.3.7	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.4	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.4.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement,		

			consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.4.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.4.3	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.4.4	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R9.4.5	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		

PER-001-0.1 R#	Explanation of Changes	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 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	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
Revised R1	The VSLs were modified using language that is consistent with the requirement and is clearer in its intent, in accordance with Guideline 2. Under High and Severe VSLs, deleted, “and” and inserted, “or.” Deleted “has.” Deleted, “the communication” and inserted, “that it communicated.” Changed “the” to “its.” And corrected capitalization of “and” and “or” and changed “a” to “the.”	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL and has determined that, as modified, the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not	NERC reviewed the existing requirement 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.	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.

			subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

PER-002-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1	The VSLs were modified using language that is consistent with the requirement and is clearer in its intent, in accordance with Guideline 2. Under Lower VSL, deleted, "applicable" and inserted "responsible [entity]." Deleted "did not adequately" and inserted, "failed to." Deleted, "and train operating personnel, affecting" and "of its" and inserted, "with adequately trained." Under Moderate VSL, deleted, "The applicable entity did not adequately staff and train operating personnel, affecting between 5-10% of its operating personnel." Inserted, "The responsible failed to staff more than 5% up to (and including) 10% with adequately trained operating personnel." Under High VSL, deleted "The applicable entity did not adequately staff and train	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL and has determined that, as modified, the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the requirement 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.	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.

	operating personnel, affecting 10-15%, inclusive, of its operating personnel." Inserted, "The responsible entity failed to staff more than 10% up to (and including) 15% with adequately trained operating personnel." Under Severe VSL, deleted, "applicable" and inserted "responsible [entity]." Deleted "did not adequately" and inserted, "failed to." Deleted, "and train operating personnel, affecting greater," inserted, "more [than15%]" and deleted "of its," and inserted, "with adequately trained."				
Revised R2	The VSLs were modified for clarity consistent with Guideline 2 and the Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, deleted, "Each Transmission Operator	See Guideline 1 Report.	The revised VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2. Additionally, NERC has reviewed the	NERC compared the requirement 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.	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.

	and Balancing Authority has produced the training program for more than 75% but less than 100% of their real-time operating personnel." Inserted, "The responsible entity did not train operating personnel for positions described in R2.1 or R2.2, affecting 5% or less of its operating personnel." Under Moderate VSL, deleted, "Each Transmission Operator and Balancing Authority has produced the training program for more than 50% but less than or equal to 75% of their real-time operating personnel." Inserted, "The responsible entity did not train operating personnel for positions described in R2.1 or R2.2, affecting more than 5% up to (and including) 10% of its operating personnel." Under High VSL, deleted, "Each Transmission Operator and Balancing Authority has produced the training program for more than 25% but less than or equal to 50% of their real-time operating personnel." Inserted, "The responsible entity did not		VSL and has determined that, as modified, the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the VSL is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

	train operating personnel for positions described in R2.1 or R2.2, affecting more than 10% up to (and including) 15% of its operating personnel." Under Severe VSL, deleted, "Each Transmission Operator and Balancing Authority has produced the training program for more than or equal to 0% but less than or equal to 25% of their real-time operating personnel." Inserted, "The responsible entity did not train operating personnel for positions described in R2.1 or R2.2, affecting more than 15% of its operating personnel."				
Revised R2.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		
Revised R2.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the		

			purposes of clarity.		
Revised R4	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. For each VSL, deleted, “applicable” and inserted, “responsible [entity].” Under the Moderate, deleted, “between” and inserted, “more than [5]% up to (and including).” Under High VSL, inserted, “more than [10]% up to (and including).” Deleted, “inclusive.” Under the Severe VSL, deleted “greater” and inserted “more.”	See Guideline 1 Report.	The revised VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL and has determined that, as revised, the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the VSL is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC reviewed the existing requirement 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.	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.

PER-003-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1	The VSLs were modified to be consistent with FERC Guideline 2, as well as for clarity and consistency with other standards and VSLs. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. In addition, the VSLs were revised to comply with Guideline 3 and Guideline 4. Under Lower VSL, deleted, "The responsible entity failed to staff an operating position with NERC certified personnel for greater than 0 hours and less 12 hours for any operating position for a calendar month." Inserted, "N/A." Under Moderate, deleted, "The responsible entity failed to staff an operating position	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL and has determined that, with the correction of typographical errors, stylistic edits or format changes, the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The existing VSL was based on number of hours the responsible entity failed to staff operating positions with NERC certified personnel. The revised VSLs were based on if the responsible entity did not staff the operating positions with NERC certified personnel meeting the conditions specified in the subrequirement. It is binary--either met or not met. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	The VSL assignments comply with Guideline 4, because they were revised to be 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.

	with NERC certified personnel for greater than 12 hours and less 36 hours for any operating position for a calendar month." Inserted, "N/A." Under High VSL, deleted, "The responsible entity failed to staff an operating position with NERC certified personnel for greater than 36 hours and less 72 hours for any operating position for a calendar month." Inserted, "N/A." Under Severe, deleted, "The responsible entity failed to staff an operating position with NERC certified personnel for greater than 72 hours for any operating position for a calendar month." Inserted, "The responsible entity did not staff all of its operating positions with personnel that are NERC-certified as required by the criteria described in R1.1 and R1.2."				
Revised R1.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11,		

			2009 informational filing with FERC, for the purposes of clarity.		
Revised R1.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2 and NERC's August 11, 2009 informational filing with FERC, for the purposes of clarity.		

PER-004-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
R1	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL and has determined that, as written, the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC reviewed the existing requirement 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.	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.
Revised R2	The VSLs were modified to be consistent with FERC and for clarity and consistency with other standards and VSLs, in accordance with Guideline 2.	See Guideline 1 Report.	The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the	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

	In addition, the VSLs were revised to comply with Guideline 3. Under Lower VSL, deleted, "The Reliability Coordinator's operating personnel completed at least 4 (but less than 5) days of emergency training." Inserted, "The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting 5% or less of its operating personnel." Under Moderate VSL, "The Reliability Coordinator's operating personnel completed at least 3 (but less than 4) days of emergency training." Inserter, "The responsible entity did not provide five days per year of training and drills, as directed by the requirement, more than 5% up to (and including) 10% of its operating personnel." Under High VSL, deleted, "The Reliability Coordinator's operating		approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL and has determined that, as modified, the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	requirement. The requirement calls for each operating personnel to have at least 5 days per year of training. The existing VSLs were based on the number of days of training. The intent is for 100% of operating personnel to have 5 days of training. The revised VSLs are based on the percent of personnel not receiving the full five day of training, using 5% increments. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	same requirement over a period of time.

	personnel completed at least 2 (but less than 3) days of emergency training." Inserted, "The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting more than 10% up to (and including) 15% of its operating personnel." Under Severe VSL, deleted, "The Reliability Coordinator's operating personnel completed less than 2 days of emergency training." Inserted, "The responsible entity did not provide five days per year of training and drills, as directed by the requirement, affecting more than 15% of its operating personnel."				
Revised R3	The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. For each VSL level, modified percentages consistent with the intent of	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The requirement calls for each operating personnel to have a comprehensive understanding of the	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.

	the Standard. Inserted, "operating [personnel] did not" and "Reliability Coordinator Area and." Corrected capitalization.		reviewed the VSL and has determined that, as written, the VSL is clear, specific and objective and does not contain general, relative or subjective language satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	Reliability Coordinator Area and interactions with neighboring Reliability Coordinator Areas. The existing VSLs were based on the percent of personnel that had an understanding of the adjacent Reliability Coordinator Area. This was not the intent of the requirement. The revised VSL is based on the percent of personnel not having a complete understanding of the Reliability Coordinator Area and interactions with neighboring Reliability Coordinator Areas. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	
Revised R4	The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. For each VSL level, modified percentages consistent with intent of the Standard. Deleted, "Generator" and inserted,	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL and has	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The requirement calls for Reliability Coordinator operating personnel to have an extensive understanding of the Balancing Authorities, Transmission Operators, and	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.

	"Generation." Change "in" to "within." Inserted, "including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions."		determined that, as revised, the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions. The existing VSL language did not include all the conditions specified in the requirement. In addition, it used large percent increments to measure compliance. The revised VSL is based on the percent of personnel not have a complete understanding of the Balancing Authorities, Transmission Operators, and Generation Operators within the Reliability coordinator Areas including all specified conditions and restrictions. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	

PRC-001-1 R#	Explanation of Changes	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 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	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
Revised R1	The VSLs were modified to be consistent with FERC Guidelines 2 and 3. Under High VSL, deleted, “entity was,” and inserted, “failed to be.” Deleted, “but,” and inserted, “OR The responsible entity.”	See Guideline 1 Report	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. 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. Therefore, the text is not subject to the	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The original High VSL made a distinction between being familiar with the purpose of protection systems and being familiar with the limitations of protection systems in a manner that was not consistent with the language of the requirement. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and	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.

			possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	with certainty.	
R3.	*No changes*. (No VSLs assigned because this requirement does not have a VRF.)				
R3.2.	*No changes*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity	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.	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.

			needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R5.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under High VSL, "N/A" and inserted, "The Generator Operator failed to notify its Transmission Operator at all of changes in generation or operating conditions that could require changes in the Transmission Operator's protection systems. (R5.1) OR The Transmission Operator failed to notify neighboring Transmission Operators at all of changes in generation, transmission, load, or operating conditions that could require changes in the other Transmission Operators' protection systems.	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement, as revised, has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2. Additionally, NERC has reviewed the VSL text and has determined that, as revised, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

	(R5.2)." Under Severe VSL, deleted, "responsible entity" and inserted, "Generator Operator." Deleted, "coordinate" and inserted, "notify its Transmission Operator at all of." Deleted, ", transmission, load." Inserted, "Transmission Operator's [protection systems]. (R5.1) AND The Transmission Operator failed to notify neighboring Transmission Operators at all." Deleted, "others:" and inserted, "changes in generation, transmission, load, or operating conditions that could require changes in the other Transmission Operators' protection systems. (R5.2)."				
Revised R5.1.	Incorporated into VSL of Main Requirement		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R5.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for		

			the purposes of clarity.		
Revised R6.	The VSLs were modified to be consistent with FERC Guidelines 2 and 3. Under High VSL, deleted, "Notification." Inserted, "The responsible entity monitored the status of each Special Protection System in its area but notification."	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	In accordance with Guideline 3, NERC has revised the VSL assignments, because the VSL assignments either redefined or undermined the requirement. The original High VSL was not consistent with the language of the requirement. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

PRC-004-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified to be consistent with FERC Guidelines 3 and 4. Under Lower VSL, deleted, "Documentation of Misoperations is complete, but documentation of Corrective Action Plans is incomplete." Inserted, "N/A." Under Moderate VSL, deleted, "Documentation of Misoperations is incomplete, and documentation of Corrective Action Plans is incomplete." Inserted, "The responsible entity provided evidence of analyzing a Misoperation but the documentation and implementation of the associated Corrective Action Plan was not provided." Under the High VSL, deleted, "Documentation of Misoperations is incomplete, and there are no associated Corrective Action Plans." Inserted, "N/A."	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The original VSL introduced the terms "incomplete" and "complete" which do not appear in the requirement itself. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	In accordance with Guideline 4, NERC has revised the VSLs , because the VSL was based on multiple violation occurrences when not permitted by the requirement language. The revised VSL was modified to clarify that each Misoperation should be analyzed and corrected. The revisions were necessary to make clear that the VSL assignments 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

	Under Severe VSL, deleted, "Misoperations have not been analyzed." Inserted, "The responsible entity did not perform an analysis of a Misoperation."				
Revised R2.	The VSLs were modified to be consistent with FERC Guidelines 3 and 4. Under Lower VSL, deleted, "Documentation of Misoperations is complete, but documentation of Corrective Action Plans is incomplete." Inserted, "N/A." Under Moderate VSL, deleted, "Documentation of Misoperations is incomplete, and documentation of Corrective Action Plans is incomplete." Inserted, "The Generator Owner provided evidence of analyzing a Misoperation but the documentation and implementation of the associated Corrective Action Plan was not provided." Under High VSL, deleted, "Documentation of	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The original VSL introduced the terms "incomplete" and "complete" which do not appear in the requirement itself. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	In accordance with Guideline 4, NERC has revised the VSLs because the VSL was based on multiple violation occurrences when not permitted by the requirement language. The revised VSL was modified to clarify that each Misoperation should be analyzed and corrected. The revisions were necessary to make clear that the VSL assignments 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

	Misoperations is incomplete, and there are no associated Corrective Action Plans." Inserted, "N/A." Under Severe VSL, deleted, "Misoperations have not been analyzed." Inserted, "The Generator Owner did not perform an analysis of a Misoperation."		Enforcement Authority.		
R3.	*No changes*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent	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.	The VSL assignments comply with Guideline 4, because the requirement expressly provides that a violation of the Reliability Standard is based on a cumulative number of violations of the same requirement over a period of time.

			and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

PRC-005-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, deleted, "N/A." Inserted, "The responsible entity failed to have a basis for the maintenance and testing intervals in their program for one of the applicable Protection Systems (protective relays, associated communication systems, current sensing devices, batteries and DC control circuitry per NERC Glossary of Terms) that affect the reliability of the BES. OR Summary of maintenance and testing procedures were missing for one of the applicable Protection Systems. (R1.1, R1.2)."	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

	Under Moderate VSL, deleted, "N/A." Inserted, "The responsible entity failed to have a basis for the maintenance and testing intervals in their program for two of the applicable Protection Systems (protective relays, associated communication systems, current sensing devices, batteries and DC control circuitry per NERC Glossary of Terms) that affect the reliability of the BES." Under High VSL, deleted, "that owned a transmission Protection System or Generator Owner that owned a generation Protection System [failed to have] either a Protection System," and inserted, "a basis for the." Deleted, "program or a Protection System," and inserted, "and [testing] intervals in their [program for] three of the applicable [Protection Systems] (protective relays, associated communication systems, current sensing devices, batteries and DC control circuitry per NERC Glossary of Terms)." Under Severe VSL, deleted, "that owned a transmission Protection System or Generator Owner that				

	owned a generation Protection System [failed to have] a[Protection System maintenance] program [and] a Protection System [testing program] for Protection Systems that affect the reliability of the BES."				
Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2.	Incorporated into VSL of Main Requirement		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, deleted, "for [more than 30] but less than or	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2. Additionally, NERC has	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.	The VSL assignments comply with Guideline 4, because the requirement expressly provides that a violation of the Reliability Standard is based on a cumulative number of violations of the same requirement over a period of time.

	equal to 40," Inserted, "calendar" and "OR Evidence Protection System devices were maintained and tested within the defined intervals (R2.1 and R2.2) was missing 5% or less of the applicable devices." Under Moderate VSL, deleted, "The responsible entity provided documentation of its Protection System maintenance and testing program for more than 40 but less than or equal to 50 days following a request from its Regional Reliability Organization and/or NERC." Inserted, "Evidence Protection System devices were maintained and tested within the defined intervals (R2.1 and R2.2) was missing more than 5% up to (and including) 10% of the applicable devices." Under High VSL, deleted, "The responsible entity provided documentation of its Protection System maintenance and testing program for more than 50 but less than or equal to 60 days following a request from its Regional Reliability Organization and/or NERC." Inserted, "Evidence Protection System devices were maintained and tested within the		reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

	defined intervals (R2.1 and R2.2) was missing more than 10% up to (and including) 15% of the applicable devices." Under Severe VSL, deleted, "The responsible entity did not provide documentation of its Protection System maintenance and testing program for more than 60 days following a request from its Regional Reliability Organization and/or NERC." Inserted, "Evidence Protection System devices were maintained and tested within the defined intervals (R2.1 and R2.2) was missing more than 15% of the applicable devices."				
Revised R2.1.	Incorporated into VSL of Main Requirement		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.2.	Incorporated into VSL of Main Requirement		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

PRC-007-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
R1.	*No changes*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.
Revised R2.	The VSLs were modified to be consistent with FERC Guideline 3.	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable.	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL	The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability

	Under Lower VSL, deleted, "The responsible entity has demonstrated the reporting of information but failed to satisfy one database reporting requirements." Inserted, "The responsible entity that owns or operates a UFLS program (as required by its Regional Reliability Organization) provided its underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database but its annual update was late by 30 calendar days or less." Under Moderate VSL, deleted, "The responsible entity has demonstrated the reporting of information but failed to satisfy two database reporting requirements." Inserted, "The responsible entity that owns or operates a UFLS program (as required by its Regional Reliability Organization) provided its underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database but its annual update was late by more than 30 calendar days but less than or		The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	assignments either redefined or undermined the requirement. The VSLs were modified to be consistent with the wording of the requirement as well as other similar standard requirements. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	Standard and are not based on a cumulative number of violations of the same requirement over a period of time.

	equal to 40 calendar days." Under High VSL, deleted, "The responsible entity has demonstrated the reporting of information but failed to satisfy at three database reporting requirements." Inserted, "The responsible entity that owns or operates a UFLS program (as required by its Regional Reliability Organization) provided its underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database but its annual update was late by more than 40 calendar days but less than or equal to 50 calendar days." Under Severe VSL, deleted, "The responsible entity has demonstrated the reporting of information but failed to satisfy four or more database reporting requirements or has not provided the information." Inserted, "The responsible entity that owns or operates a UFLS program (as required by its Regional Reliability Organization) did not provided its underfrequency data as necessary for its Regional Reliability Organization to				

	maintain and update a UFLS program database, OR The responsible entity's annual update was late by more than 50 calendar days."				
Revised R3.	The VSLs were modified to be consistent with FERC Guideline 2. For each VSL level, inserted, "or equal to." Under Moderate VSL, deleted, "39" and inserted, "40." Under High VSL, deleted, "49" and inserted, "50." Under Severe VSL, deleted, "within" and inserted, "for more than."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable NERC compared the existing requirement VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability goal. NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because the time intervals in the VSLs overlapped. The revised text clarifies the VSLs by correcting this issue. Therefore, the VSL revision eliminates the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of	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.	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.

			the VSLs in the determination of penalties by the Compliance Enforcement Authority. The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable.		

PRC-008-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. For Lower, Moderate, and High VSLs, inserted, “testing schedule or maintenance.” Deleted, “UFLS equipment testing or the schedule for UFLS equipment testing in.” Deleted, “relays.” and inserted, “equipment.” Adjusted the percentages to be consistent with standard. Under the Severe VSL, inserted, “The responsible entity failed to implement UFLS equipment maintenance and testing program. OR [The UFLS equipment identification,] testing schedule, or maintenance.” Deleted, “UFLS equipment testing or the schedule for UFLS equipment testing in the.” Adjusted the percentages to be consistent with standard. .	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. . Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the existing requirement 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.	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.

Revised R2.	The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, “but less than or equal to 40,” and inserted “calendar” and “OR Evidence UFLS equipment was maintained and tested within the defined intervals was missing for 5% or less of the applicable devices.” Under Moderate, deleted, “The responsible entity provided documentation of its UFLS equipment maintenance and testing program for more than 40 but less than or equal to 50 days following a request from its Regional Reliability Organization and/or NERC.” Inserted, “Evidence UFLS equipment was maintained and tested within the defined intervals was missing for more than 5% up to (and including) 10% of the applicable devices.”	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement’s reliability goal. The original VSLs did not account for whether or not the program was implemented; the VSL language has been modified to incorporate this case. 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.	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.

	Under High VSL, deleted, “The responsible entity provided documentation of its UFLS equipment maintenance and testing program for more than 50 but less than or equal to 60 days following a request from its Regional Reliability Organization and/or NERC.” Inserted, “Evidence UFLS equipment was maintained and tested within the defined intervals was missing for more than 10% up to (and including) 15% of the applicable devices.” Under Severe VSL, deleted, “The responsible entity did not provide documentation of its UFLS equipment maintenance and testing program for more than 60 days following a request from its Regional Reliability Organization and/or NERC.” Inserted, “Evidence UFLS equipment was maintained and tested within the defined intervals was missing for more than 15% of the applicable devices.”				

PRC-009-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	Consistent with Guidelines filed with FERC on August 11, 2009, and in accordance with Guideline 2, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement	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.	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.

			Authority.		
Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of		

			clarity.		
Revised R1.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

PRC-010-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified for clarity and consistency with other standards and VSLs. Consistent with Guidelines filed with FERC on August 11, 2009, and in accordance with Guideline 2, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Moderate, inserted, “OR The assessment of the effectiveness of the responsible entity's UVLS system did not address one of the elements in R1 (R1.1.1 through R1.1.3.).” Under High VSL, inserted, “OR The assessment of the effectiveness of the responsible entity's UVLS system did not address two of the elements in R1 (R1.1.1 through R1.1.3.).” Under Severe VSL, inserted, “OR The assessment of the effectiveness of the responsible	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of	NERC compared the 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.	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.

	entity's UVLS system did not address any of the elements in R1 (R1.1.1 through R1.1.3.).”		penalties by the Compliance Enforcement Authority.		
Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

Revised R2.	The VSLs were modified to be consistent with FERC Guideline 2. For each VSL level, inserted the word “calendar.” Deleted, “and/[or].”	See Guideline 1 Report.	NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because the time intervals were not as clear as possible. Additionally, the revised VSLs now clearly state that it is a violation to not provide documentation to either the Regional Reliability Organization or NERC. The revised text clarifies the VSLs by correcting this issue. Therefore, the revision to the VSLs eliminates the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. As revised the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable	NERC compared the 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.	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.

PRC-011-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified to be consistent with FERC Guideline 2. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, deleted, “elements” and inserted, “subrequirements.” Deleted, “1” and inserted, “2.” Also inserted, “OR The responsible entity's UVLS program did not address one of the equipment classes as specified in R1.1.1 through R1.1.4.” Under Moderate VSL, deleted, “or three [of the] elements” and inserted, “subrequirements.” Deleted, “1” and inserted, “2.” Also inserted, “OR The responsible entity's UVLS program did not address two of the equipment classes as specified in R1.1.1 through R1.1.4. Under High VSL, deleted, “four or	See Guideline 1 Report.	NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because VSL referred to elements instead of subrequirements. The revised text clarifies the VSLs by making it clear the VSL is based on demonstrated compliance with the subrequirements. Therefore, the revised VSLs eliminate the possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. The revised VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable.	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.	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.

	five," and inserted, "three." Deleted, "elements" and inserted, "subrequirements." Inserted, "OR The responsible entity's UVLS program did not address three of the equipment classes as specified in R1.1.1 through R1.1.4." Under Severe VSL, deleted, "any" and inserted, "four or more." Deleted, "elements" and inserted, "subrequirements." Deleted, "1" and inserted, "2." Inserted, "OR The responsible entity's UVLS program did not address any of the equipment classes as specified in R1.1.1 through R1.1.4."				
Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with		

			FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

Revised R1.5.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.6.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.	The VSLs were modified for clarity and consistency between standards, in accordance with Guideline 2. Under Lower VSL, inserted, "OR Evidence UVLS equipment was maintained and tested within the defined intervals was missing for 5% or less of the applicable devices." Under Moderate VSL, inserted, "OR Evidence UVLS equipment was maintained and tested within the defined intervals was missing for more than 5% up to (and including) 10% of the applicable devices."	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. 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. Therefore the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity	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.	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.

	Under High VSL, inserted, “OR Evidence UVLS equipment was maintained and tested within the defined intervals was missing for more than 10% up to (and including) 15% of the applicable devices.” Under Severe VSL, inserted, “OR Evidence UVLS equipment was maintained and tested within the defined intervals was missing for more than 15% of the applicable devices.”		needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

PRC-015-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified to be consistent with FERC Guideline 2. For the Moderate, High, and Severe VSLs, changed "elements" to "subrequirements."	See Guideline 1 Report.	NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because the current VSL refers to elements as the measure of the violation. The revised text clarifies the VSLs by referencing the subrequirements of PRC-013-0 R1. Therefore, the revised VSLs eliminate the possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.
Revised R2.	The VSLs were modified to be consistent with FERC Guideline 1 and 2. The word "elements" was changed to "sub-requirements" for clarity and consistency.	See Guideline 1 Report.	NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because	NERC compared the revised 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	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

	For each VSL, changed "elements" to "subrequirements." Under the Moderate VSL, deleted, "four." Under High VSL, deleted, "five to seven" and inserted, "three." Under Severe VSL, deleted, "eight" and inserted, "four."		the original VSL refers to elements as the measure of the violation. The revised text clarifies the VSLs by referencing the subrequirements of PRC-012-0 R1.1 through R1.9. Therefore, the revised VSLs eliminate the possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. The revised VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable.	consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	time.
Revised R3.	The VSLs were modified to be consistent with FERC Guideline 2. For each VSL level, inserted "calendar" and "calendar days." Deleted, "and/." Under Severe VSL, deleted, "for."	See Guideline 1 Report.	NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because VSL referred to days which can be interpreted multiple ways. The revised text clarifies the VSLs by making it clear the VSL is based on calendar days. Therefore, the revised VSLs eliminate the	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.	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.

			possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable.		

PRC-016-0.1R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified to be consistent with FERC Guidelines 2 and 3. Under Lower VSL, deleted, "The responsible entity was not compliant in that evidence that it analyzed its SPS operations and maintained a record of all misoperations in accordance with the Regional SPS review procedure did not address one of the elements in R1.1 through R1.9 as specified in Reliability Standard PRC-012-0_R1." Inserted, "N/A." Under Moderate VSL, deleted, "The responsible entity was not compliant in that evidence that it analyzed its SPS operations and maintained a record of all misoperations in accordance with the Regional SPS review procedure did not address two to four of the elements in R1.1 through R1.9 as specified in Reliability Standard PRC-012-0_R1." Inserted, "N/A." Under High VSL, deleted, "The	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe category level. Such change is consistent with the Commission's June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements.	NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. The original VSLs attempted to validate both whether or not the record was kept and whether or not the record complied with the requirements in PRC-012-0 R1. The VSLs were modified to be consistent with the wording of the requirement and only verify the keeping of the records. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

	responsible entity was not compliant in that evidence that it analyzed its SPS operations and maintained a record of all misoperations in accordance with the Regional SPS review procedure did not address five to seven of the elements in R1.1 through R1.9 as specified in Reliability Standard PRC-012-0_R1." Inserted, "N/A." Under Severe VSL, deleted, "was not compliant in [that] evidence that it analyze" and inserted, "downs an SPS did not analyze." Deleted, "did not address eight or more of the elements in R1.1 through R1.9 as." Corrected capitalization and typographical errors.				
Revised R2.	The VSLs were modified to be consistent with FERC Guideline 4, as well as for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, "The," and inserted, "For each Misoperation, the [responsible entity] that owns an SPS [did not take] 5% or less of the [corrective actions] designed." Deleted,	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, with the correction of	NERC compared the revised 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.	In accordance with Guideline 4, NERC revised the VSLs, because the VSLs were based on multiple violation occurrences, which are not permitted by the guideline language. The revisions were necessary to make clear that VSL assignment are based on a single violation of the Reliability Standards and are not based on a cumulative number of violations of the

	"misoperations for no more than 25% of the events," and inserted, "Misoperations." Under Moderate VSL, deleted, "The," and inserted, "For each Misoperation, the [responsible entity] that owns an SPS [did not take] more than 5% up to (and including) 10% of the [corrective actions] designed." Deleted, "misoperations for more than 25% but less than or equal to 50% of the events." Inserted, "Misoperations." Under High VSL, deleted, "The," and inserted, "For each Misoperation, the [responsible entity] that owns an SPS [did not take] more than 10% up to (and including) 15% of the [corrective actions] designed." Deleted, "misoperations for more than 50% but less than or equal to 75% of the events." Inserted, "Misoperations." Under Severe VSL, deleted, "The," and inserted, "For each Misoperation, the [responsible entity] that owns an SPS [did not take] more than 15% of the [corrective actions] designed." Deleted, "misoperations for more		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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		same requirement over a period of time.

	than 75% of the events." Inserted, "Misoperations."				
Revised R3.	The VSLs were modified to be consistent with FERC Guideline 2. For each VSL level, corrected capitalization errors. Under Lower VSL, inserted "calendar" and "calendar days." Deleted, "and/[or]." Under Moderate VSL, inserted "calendar" and "calendar days." Deleted, "150" and inserted, "130 calendar." Deleted, "and/[or]." Under High VSL inserted, "calendar" and "calendar days." Deleted, "150" and inserted, "130 calendar days," and deleted, "to 180" and inserted, "to140 calendar [days]." Deleted, "and/[or]." Under Severe VSL, deleted, "180" and inserted, "140 calendar [days]." Deleted, "and/[or]." Inserted, "OR Did not provide the	See Guideline 1 Report.	NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because defined terms were not capitalized and the definition of the VSL periods were not well defined The revised text clarifies the VSLs by clarifying that Misoperations is a defined term and clarifying the period for each VSL level. Therefore, the revision to the VSLs eliminates the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. The revised VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable.	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.	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.

	documentation."				

PRC-017-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified to be consistent with FERC Guideline 2. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. For each VSL level, deleted, "system" and inserted, "equipment." Deleted, "elements" and inserted, "subrequirements." Deleted, "R1.1" and inserted, "R1.2." Under Lower VSL, inserted, "OR The responsible entity's SPS program did not address one of the equipment classes as specified in R1.1.1 through R1.1.4." Under Moderate VSL, inserted, "OR The responsible entity's SPS program did not address two of	See Guideline 1 Report.	NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because the VSL referred to elements instead of subrequirements. The revised text clarifies the VSLs by making it clear the VSL is based on demonstrated violation or compliance with the subrequirements. Therefore, the revised VSLs eliminate the possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. The revised VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable.	NERC compared the 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.	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.

	the equipment classes as specified in R1.1.1 through R1.1.4.” Under High VSL, inserted, “OR The responsible entity's SPS program did not address three of the equipment classes as specified in R1.1.1 through R1.1.4.” Under Severe VSL, inserted, “OR The responsible entity's SPS program did not address any of the equipment classes as specified in R1.1.1 through R1.1.4.”				
Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

Revised R1.1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.1.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.5.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with		

			FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.6.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

PRC-018-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified to be consistent with FERC Guideline 2. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under High VSL, deleted, “responsible entity is not compliant in that the,” and deleted, “elements” and inserted, “subrequirements.” Under Severe VSL, deleted, “responsible entity is not compliant in that the,” and deleted, “elements” and inserted, “subrequirements.” Deleted, “and,” and inserted, “nor.”	See Guideline 1 Report.	NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because VSL referred to elements instead of subrequirements. The revised text clarifies the VSLs by making it clear the VSL is based on demonstrated violation or compliance with the subrequirements. The revised VSLs eliminate the possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. The revised VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable.	NERC compared the revised 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.	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.

Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, "entity is non-compliant in that no more than 10%," and inserted, "failed to install 5% or less." Deleted, "were not installed." Deleted, "Requirements 1 through 3," and inserted, "R1 through R3." Under Moderate VSL, deleted, "is non-compliant in that," and inserted, "failed to install [more than] 5% up to (and including)." Deleted, "but less than or equal to 20% [of the DME devices] were	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. 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,	NERC compared the revised 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.	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.

	not installed." Deleted, "Requirements 1 through 3," and inserted, "R1 through R3." Under High VSL, deleted, "is non-compliant in that," and inserted, "failed to install [more than]." Deleted, "20% but less than or equal to 30[%]," and inserted, "10% up to (and including) 15[%]." Deleted, "were not installed." Deleted, "Requirements 1 through 3," and inserted, "R1 through R3." Under Severe VSL, deleted, "is non-compliant in that," and inserted, "failed to install." Deleted, "30" and inserted, "15[%]." Deleted, "were not installed." Deleted, "Requirements 1 through 3," and inserted, "R1 through R3."		satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R3.	The VSLs were modified to be consistent with FERC Guideline 2. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. NERC has revised the VSLs to eliminate ambiguous or	NERC compared the revised 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	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

	compliance is based on meeting criteria specified in components. For each VSL, inserted, "Evidence that t[he]," and deleted, "T[he responsible entity] was not compliant in that evidence that it." Under Lower VSL, deleted, "elements," and inserted, "subrequirements." Deleted, "[R]equirements [3.1 through 3.8]." Inserted, "R3.1 through R3.8." Under Moderate VSL, deleted, "or three [of the] elements," and inserted, "subrequirements." Deleted, "[R]equirements [3.1 through 3.8]." Inserted, "R3.1 through R3.8." Under High VSL, deleted, "four or five [of the] elements," and inserted, "three subrequirements." Deleted, "in Requirements," and inserted, "listed in the subrequirements." Deleted, "[R]equirements [3.1 through 3.8]." Inserted, "R3.1 through R3.8." Under Severe VSL, deleted,		arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because VSL referred to elements instead of subrequirements. The revised text clarifies the VSLs by making it clear the VSL is based on demonstrated violation or compliance with the subrequirements. Therefore, the revised VSLs eliminate the possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. The revised VSLs comply with Guideline 2.	with the requirement and the degree of compliance can be determined objectively and with certainty.	time.

	"[more] than five of the elements," and inserted, "four or [more of the] of subrequirements." Deleted, "[R]equirements [3.1 through 3.8]." Inserted, "R3.1 through R3.8."				
Revised R3.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC		

			on August 11, 2009, for the purposes of clarity.		
Revised R3.5.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.6.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.7.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.8.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R4.	The VSLs were modified for clarity and consistency with other standards and VSLs, in	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has	NERC compared the existing VSLs to the stated requirement language to ensure the VSLs	The VSL assignments comply with Guideline 4, because they are based on a single

	accordance with Guideline 2. For each VSL level, deleted, "is not compliant in that it." Also adjusted percentage ranges for compliance determinations, consistent with requirements.		gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.
Revised R5.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. For each VSL level, corrected	See Guideline 1 Report.	As revised, the VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and	NERC compared the revised 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	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

	capitalization and adjusted percentage ranges for compliance determinations, consistent with requirements.		consistency among all approved Reliability Standards in the determination of penalties. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	requirement over a period of time.

PRC-021-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified to be consistent with FERC Guideline 2 and for clarity and consistency with other standards and VSLs. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. For each VSL level, deleted, “elements” and inserted, “subrequirements.”	See Guideline 1 Report.	NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because the VSL referred to elements instead of subrequirements. The revised text clarifies the VSLs by making it clear the VSL is based on demonstrated compliance with the subrequirements. Therefore, the revised VSLs eliminate the possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. The revised VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable.	NERC compared the revised 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.	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.
Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2,		

			and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.5.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.	The VSLs were modified to be consistent with FERC Guideline	See Guideline 1 Report,	NERC has revised the VSLs to eliminate ambiguous or	NERC compared the existing requirement VSLs to the	The VSL assignments comply with Guideline 4, because

	2. For Lower, Moderate, and High VSL levels, inserted, “calendar days” and “calendar.” Under Severe VSL, inserted, “calendar.”		arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because the reference to days was not specific enough. The revised text clarifies the VSLs by changing days to calendar days. Therefore, the revised VSLs eliminate the possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. The revised VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable.	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.	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.

PRC-022-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified to be consistent with FERC Guidelines 2 and 4. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, deleted, "The responsible entity failed to analyze and document no more than 25% of all UVLS operations and misoperations." Inserted, "The overall analysis program did not address one of the subrequirements in R1.1 through R1.5." Under Moderate VSL, deleted, "responsible entity failed to analyze and document more than 25% but less than or equal to 50% of all UVLS operations and misoperations or the." Deleted, "one" and inserted, "two." And deleted, "elements" and inserted, "subrequirements."	See Guideline 1 Report,	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, subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. The revised VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable.	NERC compared the existing requirement 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.	In accordance with Guideline 4, NERC has revised the VSLs , because the R1 and R1 subrequirement VSLs were based on multiple violation occurrences when not permitted by the requirement language. The VSL was revised to base the VSL on a single violation of a sub requirement. The revisions were necessary to make clear that the VSL assignments 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.

	Under High VSL, deleted, "responsible entity failed to analyze and document more than 50% but less than or equal to 75% of all UVLS operations and misoperations or the." Deleted, "two or," and deleted, "elements" and inserted, "subrequirements." Under Severe VSL, deleted, "more than 75% of all," and deleted, "misoperations or the" and inserted, "Misoperation. OR The," and deleted, "elements" and inserted, "subrequirements."				
Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

Revised R1.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.5.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.	The VSLs were modified to be consistent with FERC Guideline 2. Under Lower VSL, inserted, “calendar days” and calendar.” Under Moderate VSL, inserted, “calendar days,” and deleted, “150” and inserted, “130 calendar.” Under High VSL, deleted, “150” and inserted, “130 calendar days.” Deleted, “180” and inserted, “140 calendar.” Under Severe VSL, “Deleted, “180” and inserted, “140 calendar.”	See Guideline 1 Report,	NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC determined that, as previously written, the affected VSL text contained general, relative or subjective language, because the reference to days was not specific enough. The revised text clarifies the VSLs by changing days to calendar days. Therefore, the revised VSLs eliminate the possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority. The revised VSLs comply with Guideline 2. The requirement	NERC compared the revised 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.	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.

			has gradated VSLs; therefore, Guideline 2a is not applicable.		

TOP-001-1 R#	Explanation of Changes	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 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	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement.	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
R2	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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,	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.	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.

			satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
R3	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary (pass/fail) requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of	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.	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.

			penalties by the Compliance Enforcement Authority.		
R4	*No changes.*	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.
Revised R5	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Moderate VSL, deleted, “N/A.” Inserted,	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. A prior use of a binary VSL was removed to provide a	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	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

	"The Transmission Operator failed to inform its Reliability Coordinator and any other potentially affected Transmission Operators of real-time or anticipated emergency conditions, but did take actions to avoid, when possible, or mitigate the emergency." Under Severe VSL, deleted, "or" and inserted, "and."		level of gradation. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. On that basis, no changes to the VSLs were required for consistency with FERC Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as revised, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	with Guideline 3, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	requirement over a period of time.
R6	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying	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	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

			Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	time.
Revised R7	The VSLs were modified to be consistent with FERC Guideline 2. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Severe VSL, deleted, "under conditions other than those listed in TOP-001-1 R7.1 through R7.3." Inserted, "without complying	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not	NERC compared the 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.	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.

	with the applicable requirements listed in R7.1 through R7.3.”		subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R7.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R7.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R7.3	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R8	The VSL was modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2.	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is	NERC compared the VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the reliability goal of the	The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on

	Under Severe VSL, deleted, “, or the,” and inserted, “OR The.” Deleted, “periods” and inserted, “a period.” Deleted, “or during periods,” and inserted, “OR During a period.”		consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	a cumulative number of violations of the same requirement over a period of time.

TOP-002-2a R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under High VSL, inserted, "to," and deleted, "all." Also deleted "will" and inserted, "would."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; 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 significant changes to the VSLs 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in	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.	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.

			the determination of penalties by the Compliance Enforcement Authority.		
R2	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

Revised R4.	The VSLs were modified to be consistent with FERC Guideline 3. Under Lower VSL, deleted, "N/A." Under Moderate VSL, deleted, "its seasonal planning and," and inserted, "one of the following three categories of [operations] (current-day, next-day or seasonal)." Deleted, "neighboring Balancing Authorities and Transmission Operators and with its Reliability Coordinator." Inserted, "the applicable entity(ies)." Under High VSL, deleted, "N/A." and inserted, "The responsible entity failed to coordinate (where confidentiality agreements allow) two of the following three categories of operations (current-day, next-day or seasonal) with the applicable entity(ies)." Under Severe VSL, deleted, "its" and inserted, "all three of the following categories of operations." Replaced,	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The previously assigned Moderate and Severe VSLs were changed to Moderate, High and Severe, with a new High VSL. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as revised, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	In accordance with Guideline 3, NERC has revised the VSL assignments to make the VSLs more consistent with the language of the requirement. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

	"current-day, next-day, or seasonal planning and operations," with "(current-day, next-day, or seasonal)." Deleted, "neighboring Balancing Authorities and Transmission Operators and with its Reliability Coordinator." Inserted, "the applicable entity(ies)."				
R5.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of	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.	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.

			penalties by the Compliance Enforcement Authority.		
R6.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.
R7.	*No changes*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is	NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the	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

			consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	number of violations of the same requirement over a period of time.
R8.	*No changes*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as written, the VSL text is	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.	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.

			clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
R9.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs	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.	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.

			and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
R10.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

R12.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.
R13.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally,	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	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.

			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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	with the requirement and the degree of compliance can be determined objectively and with certainty.	
Revised R14.	Consistent with Guideline 2 and the Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Severe VSL, deleted, "their," and inserted, "its." Deleted, "and" and inserted, "or." Also inserted, "including real output capabilities."	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement by incorporating the sub-requirement VSLs into the core requirement and in doing so removed binary VSL inconsistencies of the sub-requirements. The new binary VSL is at the Severe level. Such a change is consistent with the Commission's June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and	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.	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.

			uniformity in the assignment of penalties for violations of binary requirements.		
Revised R14.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Retired R14.2.	N/A (Retired August 1, 2007)				N/A (Retired August 1, 2007)
Revised R15.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under the Severe VSL, deleted, “Generation” and inserted, “Generator.”	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective	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.	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.

			application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
R18.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.
R19.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is	NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the	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

			consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	number of violations of the same requirement over a period of time.

TOP-003-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
R1.	*No changes.* (There is no VRF for this requirement; therefore, no VSL is assigned.)				
Revised R1.1.	The VSL was modified to be consistent with FERC Guideline 3. Under Severe VSL, deleted, “Operators” and inserted, “Operator's.” Also inserted, “OR The Transmission Operator failed to establish the outage reporting requirements.”	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	In accordance with Guideline 3, NERC has revised the VSL assignment because the VSL language did not fully address the conditions stated in the requirement. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

Revised R1.2.	The VSL was modified to be consistent with FERC Guideline 3. Under Severe VSL, inserted, "OR The Reliability Coordinator failed to establish the outage reporting requirements."	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	In accordance with Guideline 3, NERC has revised the VSL assignment because the VSL language did not fully address the conditions stated in the requirement. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.
Revised R1.3.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, "N/A." Inserted, "The responsible entity failed to	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all	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	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

	provide the information by 1200 Central Standard Time for the Eastern Interconnection or 1200 Pacific Standard Time for the Western Interconnection but did provide the information by 1230 for the applicable interconnection." Under Moderate VSL, deleted, "N/A." Inserted, "The responsible entity failed to provide the information by 1230 Central Standard Time for the Eastern Interconnection or 1230 Pacific Standard Time for the Western Interconnection but did provide the information by 1300 for the applicable interconnection." Under High VSL, deleted, "N/A." Inserted, "The responsible entity failed to provide the information by 1300 Central Standard Time for the Eastern Interconnection or 1300 Pacific Standard Time for the Western Interconnection but did provide the information by 1330 for the applicable interconnection."		approved Reliability Standards in the determination of penalties Additionally, NERC has reviewed the VSL text and has determined that, as revised, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, and therefore satisfies Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority	consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	time.

	Under Severe VSL, deleted, “1200” and inserted, “1330.” Deleted, “and 1200” and inserted, “or 1330.”				
R2.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.
Revised	The VSLs were modified to	See	The VSLs comply with	In accordance with Guideline	The VSL assignments comply

R3.	be consistent with FERC Guideline 3. Under the Lower VSL, delete, "The responsible entity planned and coordinated scheduled outages of telemetering and control equipment and associated communication channels with its Reliability Coordinator, but failed to coordinate with affected neighboring Transmission Operators, Balancing Authorities, and Generator Operators." Inserted, "N/A." Under High VSL, deleted, "N/A." Inserted, "The responsible entity planned scheduled outages of telemetering and control equipment and associated communication channels but failed to coordinate between the affected areas."	Guideline 1 Report.	Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority	3, NERC has revised the VSL to match the language of the requirement. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.
R4.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying	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	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

			Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	with the requirement and the degree of compliance can be determined objectively and with certainty.	time.

TOP-004-2 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified to be consistent with FERC Guideline 3. Under High VSL, deleted, "The Transmission Operator operated within the Interconnection Reliability Operating Limits (IROLs), but failed to operate within the System Operating Limits (SOLs)." Inserted, "N/A."	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	In accordance with Guideline 3, NERC has revised the VSL because the VSL assignment was based on failure of a responsible entity to operate within both Interconnection Reliability Operating Limits and System Operating Limits. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.
R2.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying	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	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

			Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	with Guideline 3, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	requirement over a period of time.
Revised R3.	The VSL was modified to be consistent with FERC Guideline 3. Under Severe VSL, deleted, “its” and inserted, “policy.”	See Guideline 1 Report	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the	In accordance with Guideline 3, NERC has revised the VSL assignment because the VSL assignment was inconsistent with the language of the requirement. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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 and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R4.	The VSL was modified to be consistent with FERC Guideline 3. Under Lower VSL, deleted, "The Transmission Operator operated within the Interconnection Reliability Operating Limits (IROLs), but failed to operate within the System Operating Limits (SOLs)." Inserted, "N/A." Under Moderate VSL, deleted, "The Transmission Operator entering an unknown operating state (i.e., any state for which valid operating limits have not been determined), failed to restore operations to respect proven reliable power system limits for more than 35 minutes but less than or equal to 40 minutes." Inserted, "N/A." Under High VSL, deleted, "The Transmission Operator	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments were not consistent with the language of the requirement. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

	entering an unknown operating state (i.e., any state for which valid operating limits have not been determined), failed to restore operations to respect proven reliable power system limits for more than 40 minutes but less than or equal to 45 minutes." Inserted, "N/A." Under Severe VSL, deleted, "entering" and inserted, "entered." Inserted, "and." And deleted, "45" and inserted, "30."				
Revised R5.	The VSL was modified to be consistent with FERC Guideline 3. Under Severe VSL, deleted, "does" and inserted, "did." Deleted, "have evidence that the actions taken," and inserted, "make every effort." Deleted, "protect its area, resulting in its disconnection from the [Interconnection], were necessary to prevent the," and inserted, "remain connected to the" and "except when the Transmission Operator determined that by remaining interconnected, it was in imminent."	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity	In accordance with Guideline 3, NERC has revised the VSL assignment because the VSL assignment was inconsistent with the language of the requirement. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

			needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R6.	The VSLs were modified to be consistent with FERC Guideline 3. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, inserted, "individually and jointly with other Transmission Operators." Deleted, "including the elements listed in TOP-004-2 R6.1 through R6.4, [but failed to include] other Transmission Operators in the development," and inserted, "information required by 1." Deleted, "of said policies and procedures." Inserted, "the sub-requirements R6.1 thru R6.4." Under Moderate VSL, deleted, "one" and inserted,	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. As revised, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

	"information required by 2." Deleted, "elements listed in TOP-004-2" and inserted, "sub-requirements." Changed, "R6.1 through R6.4," to "R6.1 thru R6.4." Under High VSL, deleted, "two" and inserted "information required by 3." Deleted, "elements listed in TOP-004-2," and inserted, "sub-requirements." Changed, "R6.1 through R6.4," to "R6.1 thru R6.4." Under Severe VSL, deleted, "individually and jointly with other Transmission Operators, developed, maintained," and inserted, "failed to develop, maintain." Deleted, "but," and inserted, "If formal policies and procedures were developed, such policies and procedures." Deleted, "three" and inserted, "any of the information required in 4." Deleted, "elements listed in TOP-004-2," and inserted, "sub-requirements." Changed, "R6.1 through R6.4," to "R6.1 thru R6.4."				
Revised R6.1.	Incorporated into VSL of		NERC incorporated VSL text		

	Main Requirement.		into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R6.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R6.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R6.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

TOP-005-1.1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
R2.	*No changes*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

TOP-006-1 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
R1.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.
R1.1.	*No changes*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single	NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the	The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on

			VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	a cumulative number of violations of the same requirement over a period of time.
R1.2.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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	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.	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.

			language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R3.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, “any” and inserted, “5% or less.” Changed, “their,” to “its.” Under Moderate VSL, deleted, “N/A.” Inserted, “The responsible entity failed to provide more than 5% up to (and including) 10% of the appropriate technical information concerning protective relays to its operating personnel.” Under High VSL, deleted, “N/A.” Inserted, “The	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. Moderate and High VSLs were added to provide additional levels of gradation. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple	The VSLs utilize a gradation approach using 5% increments consistent with FERC’s June 19, 2008 VSL order. In accordance with Guideline 3, the revised VSL assignments are consistent with the requirement, and the degree of compliance can be determined objectively and with certainty	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.

	responsible entity failed to provide more than 10% up to (and including) 15% of the appropriate technical information concerning protective relays to its operating personnel." Under Severe VSL, deleted, "all" and inserted, "more than 15%." Changed, "their," to "its."		interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
R6.	*No changes*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the	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.	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.

			determination of penalties by the Compliance Enforcement Authority.		
Revised R7.	*No changes*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

TOP-007-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4

R1.	*No changes*	SEE Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.
Revised R2.	The VSLs were modified to be consistent with FERC Guideline 2.	See Guideline 1 Report.	NERC has revised the VSLs to eliminate ambiguous or arbitrary language. Specifically, NERC	NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not	The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability

	For all VSL levels, modified percentages for determining non-compliance to match Reliability Standard. Made additional edits for style and consistency.		determined that, as previously written, the affected VSL text contained general, relative or subjective language, because the language for violation percentage magnitude did not match Table 1, Levels of Non-Compliance, in the Standard. By matching Table 1 language, the revised text clarifies the VSLs. Therefore, the revised VSLs eliminate the possibility of multiple interpretations of the VSLs and provide the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	Standard and are not based on a cumulative number of violations of the same requirement over a period of time.

TOP-008-1R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
R1.	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

Revised R2.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Moderate VSL, deleted, “The Transmission Operator operated to prevent the likelihood that a disturbance, action, or inaction would result in an IROL or SOL violation in its area or another area of the Interconnection but failed to operate the Bulk Electric System to the most limiting parameter in instances where there was a difference in derived operating limits.” Inserted, “N/A.” Under High VSL, deleted, “but failed to operate to prevent the likelihood that a disturbance, action, or inaction would result in an IROL or SOL violation in.” Inserted, “Interconnection but failed to operate the Bulk Electric System to the most limiting parameter in instances where there was a difference in derived operating limits.”	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. A prior use of Moderate, High and Severe VSLs was modified to use High and Severe, with the existing Moderate VSL replacing the High VSL. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

Revised R3.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Moderate VSL, deleted, “The Transmission Operator disconnected the affected facility when the overload on a transmission facility or abnormal voltage or reactive condition persisted and equipment was endangered but failed to notify its Reliability Coordinator and all neighboring Transmission Operators impacted by the disconnection either prior to switching, if time permitted, otherwise, immediately thereafter.” Inserted, “N/A.” Under High VSL, deleted, “N/A.” Inserted, “The Transmission Operator disconnected the affected facility when the overload on a transmission facility or abnormal voltage or reactive condition persisted and equipment was endangered but failed to notify its Reliability Coordinator and all neighboring Transmission Operators impacted by the	The VSLs for the stated requirement are not based on numeric gradations. Two VSLs are provided based on unique aspects of the requirement.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. A prior use of a Severe VSL was changed to Lower, Moderate, High and Severe. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	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.

	disconnection either prior to switching, if time permitted, otherwise, immediately thereafter.”				

TPL-001-0.1 R#	Explanation of Changes	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 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	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
Revised R2.	Consistent with Guideline 2 and the Guidelines filed with FERC on August 11, 2009, NERC revised the VSLs for clarity and consistency. NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under the Lower VSL, deleted, "The responsible entity is non-compliant with 25% or less of the sub-components." Inserted, "N/A."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2a. Additionally, NERC has reviewed the VSL and has determined that, with the correction of typographical errors, stylistic edits or format	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.	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.

	Under Moderate VSL, deleted, "The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components." Inserted, "The responsible entity has failed to review the continuing need for previously identified facility additions through subsequent annual assessments. (R2.2)." Under High VSL, deleted, "The responsible entity is non-compliant with 50% or more but less than 75% of the sub-components." Inserted, "The responsible entity provided documented evidence of corrective action plans in order to satisfy Category A planning requirements, but failed to include an implementation schedule with in-service dates (R2.1.1 and R2.1.2) OR The responsible entity failed to consider necessary lead times to implement its corrective action plan. (R2.1.3)." Under the Severe VSL, deleted, "The responsible entity is non-compliant with 75% or more of the sub-components." Inserted, "The responsible entity has failed to provide documented		changes, the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The VSL covering R2.2 was revised as part of R2 to require a "review" rather than "demonstrate" the continuing need of facility additions for greater consistency with the requirement. The VSL is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

	evidence of corrective action plans in order to satisfy Category A planning requirements. (R2.1).”				
Revised R2.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2,		

			and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Moderate and Severe VSLs, changed the word "provided" to "provide."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2a. Additionally, NERC has reviewed the VSL and has determined that, with the correction of typographical errors (changed "provided" to "provide"), the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by	NERC compared the existing requirement 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.	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.

			the Compliance Enforcement Authority.		

TPL-002-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R2.	Consistent with Guidelines filed with FERC on August 11, 2009, and FERC Guideline 2, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, deleted, "The responsible entity is non-compliant with 25% or less of the sub-components." Inserted, "N/A." Under Moderate VSL, deleted, "The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components." Inserted, "The responsible entity has failed to review the continuing need for previously identified facility additions through subsequent annual assessments. (R2.2)." Under High VSL, deleted, "The responsible entity is non-compliant with 50% or more but less than 75% of the sub-components." Inserted, "The	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2a. Additionally, NERC has reviewed the VSL and has determined that, with the correction of typographical errors, stylistic edits or format changes, the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The VSL originally applicable to R2.2 was revised to "review" rather than "demonstrate" the continuing need of facility additions for greater consistency with the requirement. The VSL is not subject to the possibility of	NERC compared the existing requirement 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.	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.

	responsible entity provided documented evidence of corrective action plans in order to satisfy Category B planning requirements, but failed to include a implementation schedule with in-service dates (R2.1.1 and R2.1.2) OR The responsible entity failed to consider necessary lead times to implement its corrective action plan. (R2.1.3)." Under Severe VSL, deleted, "The responsible entity is non-compliant with 75% or more of the sub-components." Inserted, "The responsible entity has failed to provide documented evidence of corrective action plans in order to satisfy Category B planning requirements. (R2.1)."		multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R2.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

Revised R2.1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance to Guideline 2. Under Moderate and Severe	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure	NERC compared the existing requirement VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the reliability goal of the	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

	VSLs, changed the word "provided" to "provide."		uniformity and consistency among all approved Reliability Standards in the determination of penalties. Therefore, no changes to the VSLs were required for consistency with FERC Guideline 2a. Additionally, NERC has reviewed the VSL and has determined that, with the correction of typographical errors (changed "provided" to "provide"), the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	same requirement over a period of time.

TPL-003-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R2.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, deleted, "The responsible entity is non-compliant with 25% or less of the sub-components." Inserted, "N/A." Under Moderate VSL, deleted, "The responsible entity is non-compliant with more than 25% but less than 50% of the sub-components." Inserted, "The responsible entity has failed to review the continuing need for previously identified facility additions through subsequent annual assessments. (R2.2)." Under High VSL, deleted, "The	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2a. Additionally, NERC has reviewed the VSL and has determined that, with the correction of typographical errors, stylistic edits or format changes, the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. The VSL covering R2.2 was revised to "review" rather than "demonstrate" the continuing need for facility additions for greater consistency with the requirement. The VSL is not subject to the possibility of	NERC compared the existing requirement 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.	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.

	responsible entity is non-compliant with 50% or more but less than 75% of the sub-components." Inserted, "The responsible entity provided documented evidence of corrective action plans in order to satisfy Category C planning requirements, but failed to include an implementation schedule with in-service dates. (R2.1.1 and R2.1.2) OR The responsible entity failed to consider necessary lead times to implement its corrective action plan. (R2.1.3)." Under Severe VSL, deleted, "The responsible entity is non-compliant with 75% or more of the sub-components." Inserted, "The responsible entity has failed to provide documented evidence of corrective action plans in order to satisfy Category C planning requirements. (R2.1)."		multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
Revised R2.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11,		

			2009, for the purposes of clarity.		
Revised R2.1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.	The VSLs were modified for clarity and consistency with other standards and VSLs, in	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated	NERC compared the existing requirement VSLs to the stated requirement	The VSL assignments comply with Guideline 4, because they are based on a single

	accordance to Guideline 2. Under Moderate and Severe VSLs, changed the word "provided" to "provide."		VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2a. Additionally, NERC has reviewed the VSL and has determined that, with the correction of typographical errors (changed "provided" to "provide"), the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	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.	violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.

TPL-004-0 R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1.	The VSLs were modified to be consistent with FERC Guideline 3. Consistent with Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, deleted, "25% or less," and inserted, "one [of the sub-components] of requirement R1.3 (R1.3.1 through R1.3.9). OR The responsible entity has considered the NERC Category D contingencies applicable to their system, but was deficient with respect to 5% or less of all applicable contingencies. (R1.4)." Under Moderate VSL, deleted, "more than 25% but less than 50%," and inserted, "two [of the sub-components] of requirement R1.3 (R1.3.1	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2. Additionally, NERC has reviewed the VSL and has determined that, as written, the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement	In accordance with Guideline 3, NERC has revised the VSL assignments because the VSL assignments either redefined or undermined the requirement. It was identified that the previous VSLs for R1.3.2 and R1.3.8 evaluated aspects of the near-term and long-term planning horizons that were not consistent with the requirement. As revised, and incorporated into the roll-up VSLs, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.	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.

	through 1.3.9). OR The responsible entity has considered the NERC Category D contingencies applicable to their system, but was deficient with respect to more than 5% up to (and including) 10% of all applicable contingencies. (R1.4).” Under High VSL, deleted, “50% or more but less than 75%,” and inserted, “three [of the sub-components] of requirement R1.3 (R1.3.1 through 1.3.9). OR The responsible entity has considered the NERC Category D contingencies applicable to their system, but was deficient with respect to more than 10% up to (and including) 15% of all applicable contingencies. (R1.4).” Under Severe VSL, inserted, “The responsible entity did not perform the transmission assessments annually. (R1.1) OR The responsible entity has failed to demonstrate a valid assessment for the near-term planning period. (R1.2) OR.” Deleted, “75%” and inserted, “four [or more of the sub-		Authority.		

	components] of requirement R1.3 (R1.3.1 through 1.3.9). OR The responsible entity has considered the NERC Category D contingencies applicable to its system, but was deficient with respect to more than 15% of all applicable contingencies. (R1.4)."				
Revised R1.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.1.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2,		

			and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.2.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.3.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.5.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.6.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement,		

			consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.7.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.8.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.3.9.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R1.4.	Incorporated into VSL of Main Requirement.		NERC incorporated VSL into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		

Revised R2.	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance to Guideline 2. Under Moderate and Severe VSLs, changed the word "provided" to "provide."	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2. Additionally, NERC has reviewed the VSL and has determined that, with the correction of typographical errors (changed "provided" to "provide"), the VSL is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	NERC compared the existing requirement 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.	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.

VAR-001-1 R#	Explanation of Changes	Guideline 1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	Guideline 2 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	Guideline 3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	Guideline 4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations
Revised R1	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, "The applicable entity did not ensure the development and/or maintenance and/or implementation of formal policies and procedures, as directed by the requirement, affecting 5% or less of their individual and neighboring areas voltage levels and Mvar flows." Inserted, "N/A." Under Moderate VSL, deleted, "The applicable entity did not	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative, or subjective	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.	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.

	ensure the development and/or maintenance and/or implementation of formal policies and procedures, as directed by the requirement, affecting between 5-10% of their individual and neighboring areas voltage levels and Mvar flows." Inserted, "The Transmission Operator has formal policies and procedures for monitoring and controlling voltage and MVAR flows, but they are not current." Under High VSL, deleted, "The applicable entity did not ensure the development and/or maintenance and/or implementation of formal policies and procedures, as directed by the requirement, affecting 10-15%, inclusive, of their individual and neighboring areas voltage levels and Mvar flows." Inserted, "The Transmission Operator has formal policies and procedures for monitoring and controlling voltage and MVAR flows that are current, but they have not been coordinated with one or more neighboring Transmission Operators."		language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

	Under Severe VSL, deleted, "The applicable entity did not ensure the development and/or maintenance and/or implementation of formal policies and procedures, as directed by the requirement, affecting greater than 15% of their individual and neighboring areas voltage levels and Mvar flows." Inserted, "The Transmission Operator has formal policies and procedures for monitoring and controlling voltage and MVAR flows, but has not implemented them. OR The Transmission Operator does not have formal policies and procedures for monitoring and controlling voltage and MVAR flows."				
Revised R3	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Severe VSL, changed, "exempts" to "exempted." Also changed, "Requirement 4, and Requirement 6.1." to "Requirement R4, and Requirement R6.1." Deleted,	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, with the correction of	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	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.

	"to all of the parties involved."		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. The VSL was revised to drop the phrase "to all of the parties involved" for greater consistency with the stated requirement. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	with certainty.	
R6.1	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as	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	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.

			written, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	determined objectively and with certainty.	
Revised R11	The VSLs were modified for clarity and consistency with other standards and VSLs, in accordance with Guideline 2. Under Lower VSL, deleted, 'The Transmission Operator provided documentation to the Generator Owner specifying required step-up transformer tap changes and a timeframe for making these changes, but failed to provide technical justification for these changes." Inserted, "N/A." Under Moderate VSL, deleted, ", but failed to provide" and inserted, "and." Also, deleted,	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; therefore, Guideline 2a is not applicable. The gradated VSLs ensure uniformity and consistency among all approved Reliability Standards in the determination of penalties. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the	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.	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.

	"and," and inserted, ", but failed to provide [technical justification for these changes]." Under High VSL, changed, "failed to provide" to "provided." Also, inserted, "but failed to provide [a timeframe for making these changes], " and deleted a, ",". Under Severe VSL, deleted, "N/A." Inserted, "The Transmission Operator failed to provide documentation to the Generator Owner specifying required step-up transformer tap changes, a timeframe for making these changes, and technical justification for these changes."		possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		
R12	*No changes.*	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has a binary VSL assignment at the Severe category level. This is consistent with other single VSL assignments, for binary requirements, satisfying Guideline 2a. Additionally, NERC has reviewed the VSL text and has determined that, as written, the VSL text is clear, specific and objective and	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.	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.

			does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

VAR-002-1.1a R#	Explanation of Changes	Guideline 1	Guideline 2	Guideline 3	Guideline 4
Revised R1	The VSLs were modified to be consistent with Guideline 2. Under Lower VSL, deleted, "The Generator Operator failed to notify the Transmission Operator as identified in R1 for less than 25% of its generators." Inserted, "N/A." Under Moderate VSL, deleted, "The Generator Operator failed to notify the Transmission Operator as identified in R1 for 25% or more but less tan 50% of its generators." Inserted, "N/A." Under High VSL, deleted, "The Generator Operator failed to notify the Transmission Operator as identified in R1 for 50% or more but less tan 75% of its generators." Inserted, "N/A." Under Severe VSL, deleted, "The Generator Operator," and inserted, "The responsible entity did not operate each	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe category level. Such change is consistent with the Commission's June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements.	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.	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.

	generator in the automatic voltage control mode and." Deleted, "for 75% or more of its generators."				
Revised R2	The VSLs were modified to be consistent with FERC Guideline 3, as well as for clarity and consistency with other standards and VSLs. Consistent with Guideline 2 and the Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, deleted, "The Generator Operator failed to maintain a voltage or reactive power schedule for less than 25% of its generators." Inserted, "When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2a. 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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs	NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability goal. The original VSL measured the number of generators on schedule, which is specificity not detailed in the requirement. The VSLs were modified to remove this detail. 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.	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.

	Operator failed to meet the directed values by 5% or less." Under Moderate VSL, deleted, "The Generator Operator failed to maintain a voltage or reactive power schedule for 25% or more but less tan 50% of its generators." Inserted. "When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator Operator failed to meet the directed values by more than 5% up to (and including) 10% OR When a generator's automatic voltage regulator is out of service, the Generator Operator failed to use an alternative method to control the generator voltage and reactive output to meet the voltage or Reactive Power schedule directed by the Transmission Operator. OR The Generator Operator failed to provide an explanation of why the voltage schedule could not be met." Under High VSL, deleted,		and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		

	"The Generator Operator failed to maintain a voltage or reactive power schedule for 50% or more but less tan 75% of its generators." Inserted, "When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator Operator failed to meet the directed values by more than 10% up to (and including) 15%." Under Severe VSL, deleted, "The Generator Operator failed to maintain a voltage or reactive power schedule for 75% or more of its generators." Inserted, "When directed by the Transmission Operator to maintain the generator voltage or reactive power output the Generator Operator failed to meet the directed values by more than 15%. OR When a generator's automatic voltage regulator is out of service, the Generator Operator failed to use an alternative method to control the generator voltage and reactive output to meet the				

	voltage or Reactive Power schedule directed by the Transmission Operator and the Generator Operator failed to provide an explanation of why the voltage schedule could not be met."				
Revised R2.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R2.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3	The VSLs were modified to be consistent with Guideline 4. Consistent with Guideline 2 and the Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components.	See Guideline 1 Report.	The VSLs comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with Guideline 2.	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	In accordance with Guideline 4, NERC has revised the VSLs because the VSLs were based on multiple violation occurrences when not permitted by the requirement language. NERC determined that the prior VSLs allowed for multiple incidents of a GOP failing to notify a TOP of issues related to a status or capability change on any generator Reactive Power resource, including the

	Under Lower VSL, deleted, "The Generator Operator had one incident of failing to notify the Transmission Operator as identified in R3." Inserted, "N/A." Under Moderate VSL, deleted, "The Generator Operator had more than one but less than five incidents of failing to notify the Transmission as identified in R3.1 R3.2." Inserted, "N/A." Under High VSL, deleted, "had more than five but less than ten incidents of failing," and inserted, "failed [to notify the Transmission Operator] within 30 minutes of the information." Deleted, "identified," and inserted, "specified [in] either [R3.1] or [R3.2]." Under Severe VSL, deleted, "had ten or more incidents of failing," and inserted, "failed [to notify the Transmission Operator] within 30 minutes of the information as." Deleted, "identified," and inserted, "specified [in] either [R3.1] or [R3.2]."		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. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.	with certainty.	status of each automatic voltage regulator and power system stabilizer or any other Reactive Power resources under the Generator Operator's control. The revisions were necessary to make clear that the VSL assignments 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.

Revised R3.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R3.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R4	The VSLs were modified to be consistent with FERC Guideline 4. Consistent with Guideline 2 and the Guidelines filed with FERC on August 11, 2009, NERC incorporated the sub-requirements into the Main Requirement VSL so that compliance is based on meeting criteria specified in components. Under Lower VSL, deleted, "Generator Owner had one (1) incident of failing," inserted, "Responsible entity failed." Deleted, "[to] notify," and	See Guideline 1 Report.	The VSLs, as revised, comply with Guideline 2. The requirement has gradated VSLs; 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 to the VSLs were required for consistency with FERC Guideline 2. Additionally, NERC has reviewed the VSL text and has determined that, as modified, the VSL text is clear, specific and objective	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.	In accordance with Guideline 4, NERC has revised the VSLs because the VSLs were based on multiple violation occurrences when not permitted by the requirement language. NERC determined that the prior VSLs allowed for multiple incidents of a GO failing to the needed GSU transformer information and did not properly account for the timeliness of providing the information. The revisions were necessary to make clear that the VSL assignments are based on a single violation of a

	inserted, “provide to.” Deleted, “within 30 calendar days of a request for information,” and inserted, “one of the types of data.” Deleted, “described,” and inserted, “specified.” Deleted, “[in R4.1.1] through R,” and inserted, “or R 4.1.2 or 4.1.4.” Deleted, “regarding generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage.” Inserted, “3 or 4.1.4 OR The information was provided in more than 30, but less than or equal to 35 calendar days of the request.” Under Moderate VSL, deleted, “Generator Owner had more than one (1) incident but less than five (5) incidents of failing,” and inserted, “Responsible entity failed.” Deleted, “notify,” and inserted, “provide to.” Deleted, “ within 30 calendar days of a request for information,” and inserted, “two of the types of data.” Deleted, “described,” and inserted, “specified.”		and does not contain general, relative or subjective language, satisfying Guideline 2b. Therefore, the text is not subject to the possibility of multiple interpretations of the VSLs and provides the clarity needed to permit the consistent and objective application of the VSLs in the determination of penalties by the Compliance Enforcement Authority.		Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.

	Deleted, “[in R4.1.1] through R,” and inserted, “or R 4.1.2 or 4.1.4.” Deleted, “regarding generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage.” Inserted, “3 or 4.1.4 OR The information was provided in more than 35, but less than or equal to 40 calendar days of the request.” Under High VSL, deleted, “Generator Owner had more than five (5) incidents but less than ten (10) incidents of failing,” and inserted, “Responsible entity failed.” Deleted, “notify,” and inserted, “provide to.” Deleted, “within 30 calendar days of a request for information,” and inserted, “three of the types of data.” Deleted, “described,” and inserted, “specified.” Deleted, “[in R4.1.1] through R,” and inserted, “or R 4.1.2 or 4.1.4.” Deleted, “, regarding generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator				

	terminal voltage." Inserted, "2 or 4.1.3 or 4.1.4 OR The information was provided in more than 40, but less than or equal to 45 calendar days of the request." Under Severe VSL, deleted, "Generator Owner had more than ten (10) incidents of failing,' and inserted, "Responsible entity failed." Deleted, "notify," and inserted, "provide to." Deleted, "within 30 calendar days of a request for information," inserted, "any of the types of data." Deleted, "described," and inserted, "specified." Deleted, "[in R4.1.1] through R," and inserted, "or R 4.1.2 or 4.1.4." Deleted, ", regarding generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage." Inserted, "2 and 4.1.3 and 4.1.4 OR The information was provided in more than 45 calendar days of the request."				

Revised R4.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R4.1.1	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R4.1.2	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R4.1.3	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of clarity.		
Revised R4.1.4	Incorporated into VSL of Main Requirement.		NERC incorporated VSL text into the core requirement, consistent with Guideline 2, and with Guidelines filed with FERC on August 11, 2009, for the purposes of		

			clarity.		
Revised R5	The VSLs were modified to be consistent with FERC Guidelines 2 and 4. Eliminated Lower, Moderate, and High VSLs. Inserted, "N/A." Under Severe VSL, deleted, "The Generator Owner had more than ten (10) incidents of failing," and inserted, "responsible entity failed [to]," and deleted, "change the step-up," and inserted, "ensure that." Deleted, "[transformer tap] settings in accordance with," and inserted, "positions were changed according to."	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe category level. Such change is consistent with the Commission's June 24, 2009 VSL order related to binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements.	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.	In accordance with Guideline 4, NERC has revised the VSLs because the VSLs were based on multiple violation occurrences when not permitted by the requirement language. NERC determined that the prior VSLs allowed for multiple incidents of a GO failing to ensure that transformer tap positions are changed, according to the specifications provided by the TOP. The revisions were necessary to make clear that the VSL assignments 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.
Revised R5.1	The VSLs were modified to be consistent with FERC Guidelines 2 and 4. Eliminated Lower, Moderate, and High VSLs. Under Severe VSL, deleted, "Generator Operator had more	See Guideline 1 Report.	In accordance with Guideline 2, to ensure consistency in the VSL assignments for binary requirements, NERC revised the VSL for this requirement to assign it a binary VSL at the Severe category level. Such change is consistent with the Commission's June 24, 2009 VSL order related to	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	In accordance with Guideline 4, NERC has revised the VSLs because the VSLs were based on multiple violation occurrences when not permitted by the requirement language. NERC determined that the prior VSLs allowed for multiple incidents of a GO failing to notify the Transmission

	than ten (10) incidents of failing." Inserted, "responsible entity failed [to notify] the Transmission Operator [and] to [provide technical justification]." Deleted, "to the Transmission Operator concerning non-compliance with Transmission Operator's specifications."		binary VSL assignments and will ensure consistency and uniformity in the assignment of penalties for violations of binary requirements.	degree of compliance can be determined objectively and with certainty.	Operator and provide the technical justification for failing to meet the TOP's technical specifications for GSU tap positions. The revisions were necessary to make clear that the VSL assignments 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.

Exhibit D— Guideline 1 Report

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION	**) Docket Nos.**	**RR08-4-000**
	)	**RR08-4-001**
	)	**RR08-4-002**

GUIDELINE 1 VSL REVIEW REPORT

NERC VSL FERC Guideline 1 Report

Introduction

In the Violation Severity Level (VSL) Order issued in June, 2008,[1] Federal Energy Regulatory Commission (FERC) described four guidelines for evaluating Reliability Standard Violation Severity Levels. FERC posited that these guidelines would provide a "consistent and objective means for assessing, *inter alia*, the consistency, fairness and potential consequences of VSL assignments," and directed NERC to conduct and document a specific and detailed review of approved VSLs for consistency with those guidelines. Guideline 1, discussed in more detail below, is intended to evaluate VSLs approved by FERC to ensure those VSLs do not unintentionally signal a lowering of the compliance bar relative to past practices. To address this concern, FERC directed in its June VSL Order that NERC file a report[2] evaluating VSLs based on historical performance, where NERC has historical performance data, and to compare that historical compliance for individual requirements with their assigned VSL to ensure that the VSL assignments do not reduce current levels of reliability.

This report summarizes the results of NERC's Reliability Standards FERC Guideline 1 analysis assessing whether, based on historical compliance information, proposed VSLs may unintentionally encourage levels of compliance performance lower than has been historically achieved. This report includes a description of how NERC performed this analysis, identifies the requirement and its current VSL assignments, and summarizes the requirement's historical performance data. Where NERC determined that its VSL assignments are not consistent with a requirement's historical performance data, NERC has either: (i) proposed revised assignments that accurately reflect historical levels of compliance or (ii) provided a justification of the current VSL assignment.

Background

FERC has expressed concern that the NERC VSL assignment process does not specifically consider the "unintended consequence of lowering the current level of compliance,"[3] and has stated that historical compliance data provides a reasonable baseline to assess whether assigned VSLs may encourage reduced levels of compliance performance. To avoid the possibility that assigned VSLs are ultimately arbitrary and could encourage less rigorous compliance, FERC has explained that Guideline 1 "will help to maintain at least the current level of compliance and reliability and ensure that ultimately VSLs are not arbitrarily assigned."[4] FERC has stated that "Guideline 1 seeks to ensure that proposed VSL assignments will not signal to applicable entities

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[1] *North American Electric Reliability Corporation*, "Order on Violation Severity Levels Proposed by the Electric Reliability Organization," 123 FERC ¶ 61,284 (2008) (June VSL Order).

[2] According to FERC, in describing the Guideline 1 report: *NERC must identify and compare (i) each requirement and its current violation severity level assignment, (ii) the requirement's pre-2008 historical data, and (iii) the requirement's 2008 compliance data. Where NERC determines that a requirement's violation severity level assignments are not consistent with either the requirement's pre-2008 historical compliance data or its 2008 compliance data, NERC should submit either (i) revised assignments or (ii) a justification of the current violation severity levels assignments. If revised assignments are submitted, NERC should discuss which data it used to revise the assignments.*

[3] June VSL Order at P 21.

[4] *North American Electric Reliability Corporation*, "Order on Rehearing and Clarification and Accepting Compliance Filing," 125 FERC ¶ 61,212 at P 7 (2008) (November VSL Order).

that less compliance than that which has been historically achieved is condoned."[5] NERC agrees that it is important to analyze industry performance over time, and has conducted the review directed by FERC. NERC believes this review fully complies with FERC's Guideline 1 VSL review directive in the VSL Order.

Violation Severity Levels

As described in the NERC Sanction Guidelines,[6] VSLs are defined measurements of the degree to which a violator violated a requirement of a reliability standard. Whereas Violation Risk Factors (VRFs) are determined pre-violation and indicate the relative potential impacts that violations of each standard could pose to the reliability of the bulk power system, the VSL is assessed post-violation and is an indicator of how severely the violator actually violated the standard(s) requirement(s) in question. Up to four levels can be defined for each requirement; the levels have been designated as: Lower, Moderate, High, and Severe. Although NERC filed and FERC approved VSLs for each requirement and sub-requirement, in August, 2009, NERC submitted an informational filing that described the method for incorporating sub-requirements[7] into the VSLs for the main requirement for requirements and sub-requirements that accomplish a common reliability objective. This method was utilized in the FERC Guideline analysis.

Review Process and Assumptions

The review conducted in this report was performed by NERC staff. Conducting a meaningful review of compliance elements for mandatory standards using data compiled for compliance with non-mandatory standards is a complex proposition. It is important to acknowledge facts and circumstances which may limit the validity of conclusions about the influence of current VSLs in promoting compliance compared to previous VSL assignments or to the original "Levels of Non-Compliance" contained in many of the original 83 FERC-approved standards. Specifically, the following should be kept in mind when reviewing the analyses:

- Standards have changed over time, and as new standards have been created, the ability to perform meaningful comparisons over time has diminished.
- Levels of Non-Compliance have, in the past, generally been written as if they represent a violation of the standard on the whole, rather than a specific requirement of the standard.
- Levels of Non-Compliance have not always addressed all requirements within a standard, meaning there is no data to use for comparison regarding those requirements. .
- Prior to 2005, performance was measured against the NERC's Operating Policies. These policies were "translated" into the Version 0 standards that FERC considered for its approval. NERC has not included data from 2003 and 2004 to provide a consistent baseline for comparisons using the current standard format and content.
- Compliance percentages from 2005 and 2006 were largely based on self-reporting.
- In 2005 and 2006, not all standards were evaluated for compliance.

[5] June VSL Order at P 7.

[6] Sanction Guidelines of the North American Electric Reliability Corporation, Appendix 4B of the NERC Rules of Procedure (January 15, 2008).

[7] Informational Filing of the North American Electric Reliability Corporation Regarding the Assignment of Violation Risk Factors and Violation Severity Levels, (Docket Nos. RM08-11-000, RR08-04-000, RR07-09-000, RR07-10-000) (August 10, 2009).

- In 2005 and 2006, compliance was generally reported "by utility."
- Data used in the 5-year analysis for 2007 is based partially on pre-June 18 data, with the remainder based on post-June 18 data. The pre-June 18 data includes a large number of violations, due to transition from voluntary compliance to mandatory and enforceable compliance.
- In 2007, 2008 and 2009, compliance was reported on a per-requirement basis.
- In 2007, 2008 and 2009, compliance was analyzed on a per-event basis and reported accordingly. Rather than reporting "99 out of 100 entities were in compliance," as was the customary practice prior to 2007, NERC began reporting "there were 3 violations of Standard X, Requirement Y."
- Data for 2009 is current as of March 5, 2010.
- The data for 2007, 2008, and 2009 includes alleged and confirmed violations.

To address the issues raised from using inconsistent data sets, NERC established a set of assumptions necessary to the review. In order to compare data across all years, these assumptions are necessary to normalize the data and determine a common reference. In this case, NERC has applied the following assumptions/approach:

- Treat any violation of a requirement in 2007, 2008 or 2009 as a violation of the standard.
- Sum the standard violations by year, grouped by standard, to serve as the numerator in a compliance percentage.
- Evaluate the functional entities responsible for the each requirement in the standard and use the compliance registry to estimate the denominator for the compliance percentage (*e.g.*, if requirement R1 applies to Balancing Authorities and Transmission Operators, then the total number of potential violations of Requirement R1 is equal to the number of registered BAs and TOPs.).
- This approach does NOT treat multiple violations of a standard by a single entity as a single violation, as would have been done in 2005 and 2006.

While acknowledging the importance of ensuring that historic levels of compliance are at least maintained (and ideally, improved), NERC continues to believe that the limitations described above impair the validity of comparisons and resulting conclusions about the effect of the VSLs on meeting reliability goals. NERC also believes that analyzing historical data as suggested is a reactive measurement that only indicates a need to "fix" a requirement (or its associated compliance data) after its effectiveness has been compromised. NERC believes that it is more critical to review requirements and compliance elements before they are implemented to determine if they could have the effect of lowering reliability, using historical approaches as a reference. One must analyze the requirements and compliance elements themselves to determine if they have "set the bar" correctly. The criteria themselves must be set to the correct levels, *regardless* of entities' past compliance performance.

In this review, NERC performed an analysis of the specific criteria measured in the Levels of Non-Compliance used in the original 83 FERC-approved standards, subsequently assigned VSLs, and any other VSLs associated with the standard, including those proposed in this filing. NERC has expanded the VSL analysis directed by FERC to determine if the mandated level of

reliability has been raised or lowered due to changes in the criteria employed to evaluate compliance. The rationale for the expanded review is based on NERC's belief that, while evaluations of compliance data may correlate with those criteria, the analysis of the criteria themselves is a more reliable basis for determining whether the effect of a VSL assignment is a consistently sound compliance incentive. NERC believes focusing this analysis on the content of the VSLs (*i.e*., asking, "Will this VSL, as written, hold entities to a higher standard than that to which they have been held the past? Will it hold them to the same standard? To a lower standard?") is more likely to be reliably predictive of the relative compliance incentive value of the VSL assignments under review.

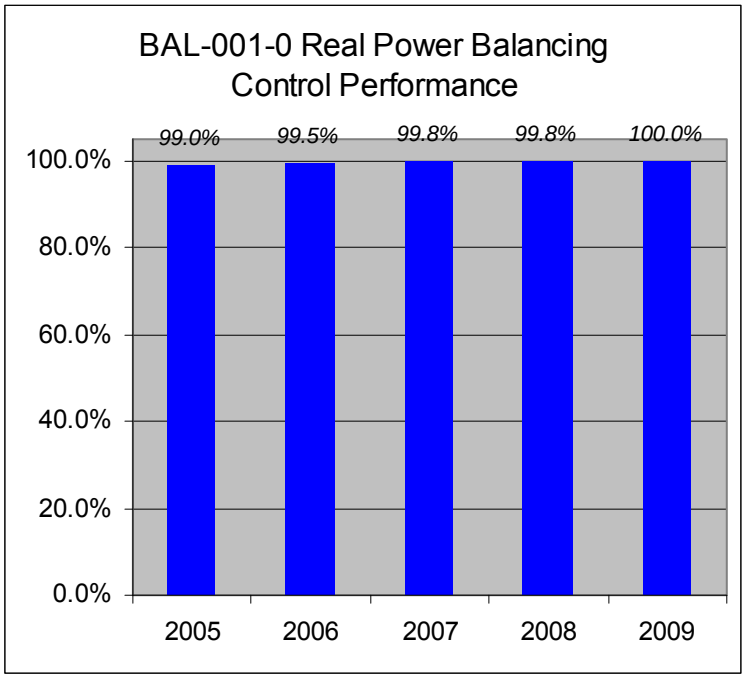
The body of this report consists of a standard by standard review of available historical data, followed by comparison of compliance criteria, and preliminary conclusions regarding the potential effect of proposed VSL assignments on compliance perceptions and practice. The Standards are presented by family of standards in alphabetical order: BAL, CIP, COM, EOP, FAC, INT, IRO, MOD, NUC, PER, PRC, TOP, TPL, and VAR.

Guideline 1 Analysis of BAL-001 — Real Power Balancing Control Performance

Description of Standard
BAL-001 is intended to require that entities maintain Interconnection steady-state frequency within defined limits by balancing real-power demand and supply in real-time. In this standard, the key measures for reliability are the two performance scores, CPS1 (Control Performance Standard 1) and CPS2 (Control Performance Standard 2). CPS1 measures a Balancing Authority's ability to balance generation, load, imports, and exports throughout a rolling 12-month period. CPS2 measures how often a Balancing Authority is able to adequately balance generation, load, imports, and exports during a given month. Both are ongoing measures, meaning that there are no specific triggers that initiate measurement of performance.

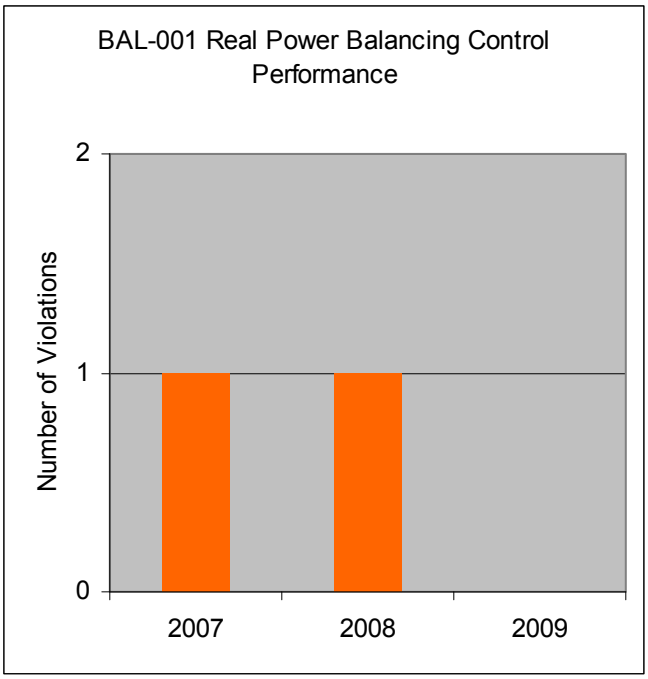
To date, there is only one FERC-approved version of the standard.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is shown based on the percentage of compliant entities in graphical form below:



BAL-001 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There were a limited number of violations during this time.[8]

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established for CPS1 and CPS2. For CPS1, a violation occurred if calculated CPS1 was less than 100%, with the most severe penalty imposed if calculated CPS1 was less than 85%.

Level 1 Violation	The Balancing Authority Area's value of CPS1 is less than 100% but greater than or equal to 95%.
Level 2 Violation	The Balancing Authority Area's value of CPS1 is less than 95% but greater than or equal to 90%.
Level 3 Violation	The Balancing Authority Area's value of CPS1 is less than 90% but greater than or equal to 85%.
Level 4 Violation	The Balancing Authority Area's value of CPS1 is less than 85%.

CPS1 Levels of Non-Compliance

For CPS2, a violation occurred if calculated CPS2 was less than 90%, with the most severe penalty imposed if calculated CPS1 was less than 75%.

[8] The data for 2007, 2008, and 2009 in this chart and the equivalent charts for the remaining standards in this analysis reflect the start-up of the mandatory compliance and enforcement effort. There is a necessary lag from when a violation may occur, to when it gets picked up in the enforcement program, to when it finally emerges from the enforcement program as a confirmed violation.

Level 1 Violation	The Balancing Authority Area's value of CPS2 is less than 90% but greater than or equal to 85%.
Level 2 Violation	The Balancing Authority Area's value of CPS2 is less than 85% but greater than or equal to 80%.
Level 3 Violation	The Balancing Authority Area's value of CPS2 is less than 80% but greater than or equal to 75%.
Level 4 Violation	The Balancing Authority Area's value of CPS2 is less than 75%.

CPS2 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and translated them directly to VSLs for both Requirement R1 (CPS1) and Requirement R2 (CPS2). Additionally, binary VSLs were added to address two requirements, R3 and R4, which were not previously assigned Levels of Non-Compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain VSLs approved on June 19, 2008 for requirements R1, R2, and R3. NERC proposes to modify the VSL for R4 to clarify the obligations of each Balancing Authority.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
Because the thresholds that indicate compliance with CPS1 and CPS2 have not changed, NERC concludes that the proposed VSLs associated with CPS1 and CPS2 will not allow for a lower level of reliability than was historically observed. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of BAL-002 — Disturbance Control Performance

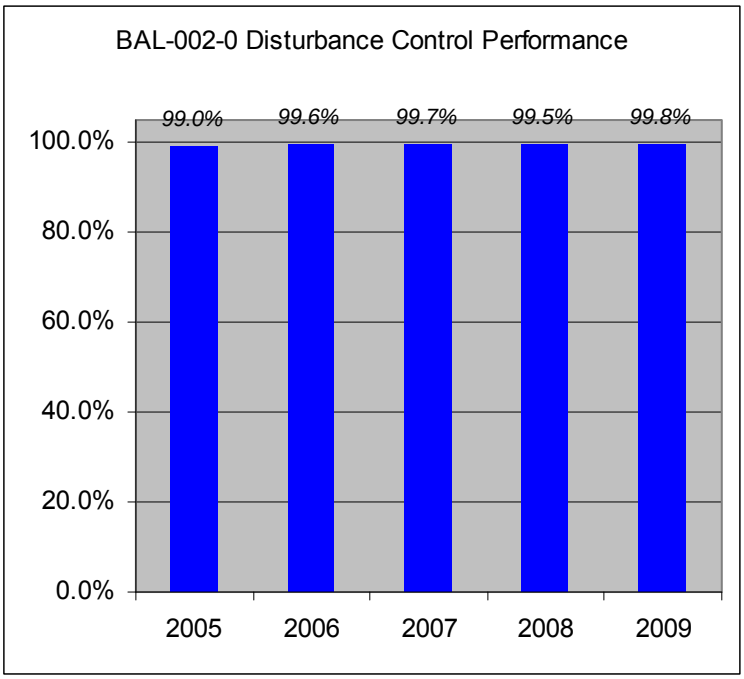
Description of Standard

BAL-002 is intended to ensure that the Balancing Authority is able to utilize its Contingency Reserve to balance resources and demand and return Interconnection frequency to normal levels following a disturbance. Currently, only a loss of generation is considered a "disturbance." In this standard, the key measure for reliability is the performance score Disturbance Control Standard (DCS). DCS measures a Balancing Authority's ability to rebalance generation, load, imports, and exports following the loss of generation. DCS is an event-based measure, meaning that measurement begins at a specific point (in this case, the start of the disturbance) and terminates at a specific point (in this case, fifteen minutes later). Each event is used to compile an average performance score, which on a quarterly basis must be equal to 100%.

To date, there is only one FERC-approved version of the standard.

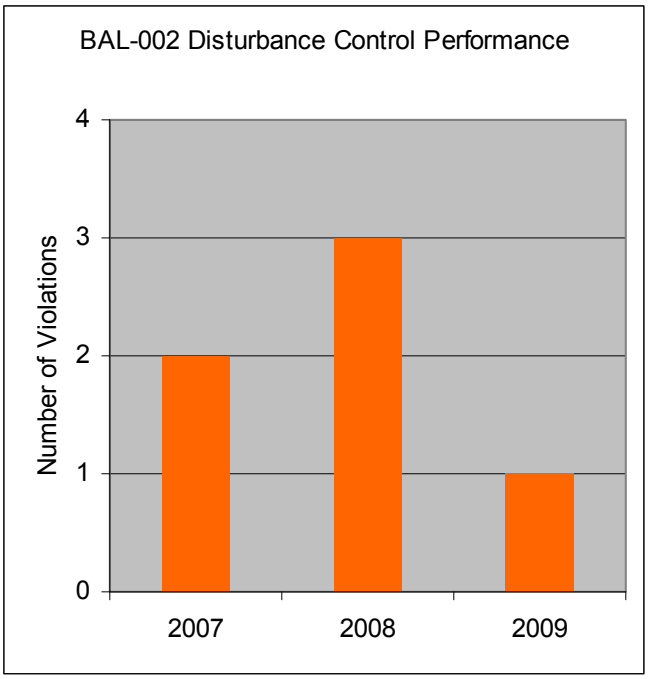
Historical Performance

NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is presented below in graphical form based on the percentage of compliant entities.



BAL-002 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There have been a limited number of violations during this time.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for DCS. For DCS, a violation occurred if the calculated average quarterly DCS was less than 100%, with the most severe penalty imposed if the calculated average quarterly DC was less than 85%.

Level 1 Violation	Value of the average percent recovery for the quarter is less than 100% but greater than or equal to 95%.
Level 2 Violation	Value of the average percent recovery for the quarter is less than 95% but greater than or equal to 90%.
Level 3 Violation	Value of the average percent recovery for the quarter is less than 90% but greater than or equal to 85%.
Level 4 Violation	Value of the average percent recovery for the quarter is less than 85%.

DCS Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retain the criteria used in the Level of Non-Compliance criteria and translate them directly to VSLs for requirements R3, R4, and R5. Additionally, several additional VSLs were added to address requirements that were not previously assigned Levels of Non-Compliance.

Subsequently, on June 24, 2009, FERC approved a set of VSLs assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- The VSL for Requirement R1 has been modified to be a graded VSL, rather than a binary VSL.
- The VSL for Requirement R2 was modified to base compliance on a range of zero to four omissions, rather than zero to six. This raises the bar with regard to compliance with R2.
- VSLs for components of requirements R2, R3, R4, R5, and R6 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements or eliminated as discussed in the Guideline 2-4 review.

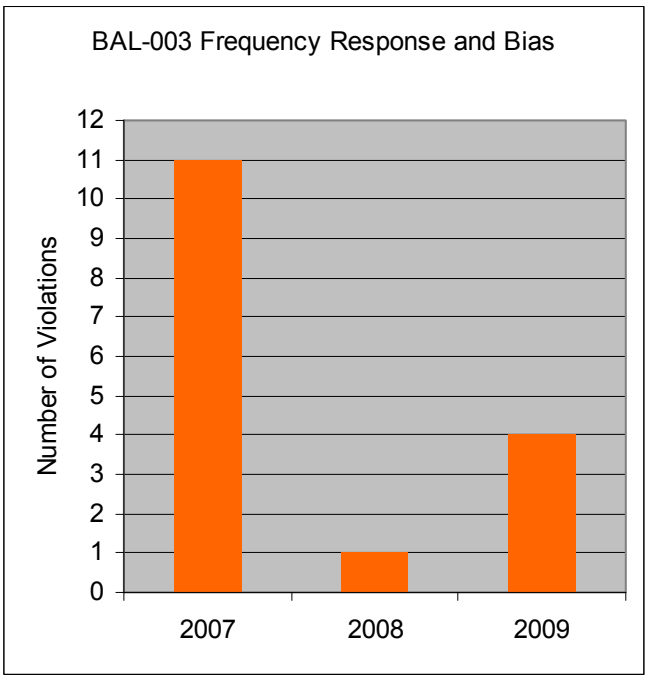
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
Because the thresholds that indicate compliance with DCS have not changed, NERC concludes that the proposed VSLs associated with DCS will not allow for a lower level or reliability than was historically observed. Additionally, the changes to the VSLs in one case (R2) are more stringent than those approved in the past. With the exception of raising VSLs for binary violations to Severe as described in the December 19, 2008 filing, 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 1 Analysis of BAL-003 — Frequency Response and Bias

Description of Standard
BAL-003 is intended to provide a consistent method for calculating the Frequency Bias component of the Area Control Error equation.

To date, there is only one FERC-approved version of the standard.

Historical Performance
For 2007, 2008, and 2009, compliance data is presented graphically based on the number of violations:



There have been a limited number of violations during this time, with the most occurring in 2007.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were not established.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs for this standard.

Subsequently, on June 24, 2009, FERC approved a set of VSLs assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- VSLs for requirements R1, R2, R4, and R6 have been modified to add clarity and ensure consistency with other standards and VSLs.
- VSLs for components of requirements R1 and R2, (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

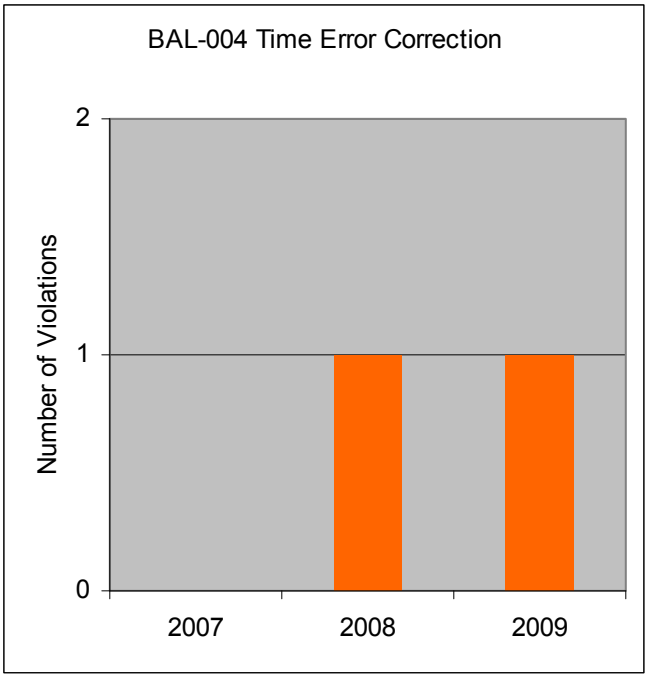
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing are consistent with those that are currently approved. With the exception of raising VSLs for binary violations to Severe as described in the December 19, 2008 filing, the VSLs have not changed 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 1 Analysis of BAL-004 — Time Error Correction

Description of Standard
BAL-004 is intended to address the implementation of Time Error Corrections, during which entities intentionally modify their target schedules in order to ensure that time-keeping devices that use the 60Hz signal of North American Alternating Current as their time source remain accurate.

There have been two versions of the standard — BAL-004-0, and BAL-004-1, that is filed with FERC but not yet approved. Therefore, all compliance data references Version 0 of BAL-004.

Historical Performance
For 2007, 2008, and 2009, compliance data is presented graphically based on the number of violations:



There have been a limited number of violations of this standard.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were not established.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs for this standard.

Subsequently, on June 24, 2009, FERC approved a set of VSLs in which NERC had applied a consistent approach to assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review

NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- The VSLs for requirements R1 and R4 have been modified to be consistent with Guideline 3.
- The VSLs for Requirement R2 have been modified for clarity and consistency with other standards and VSLs.
- The VSLs for R3 have been modified to be consistent with Guideline 4. Additionally, the VSLs for components of R3 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

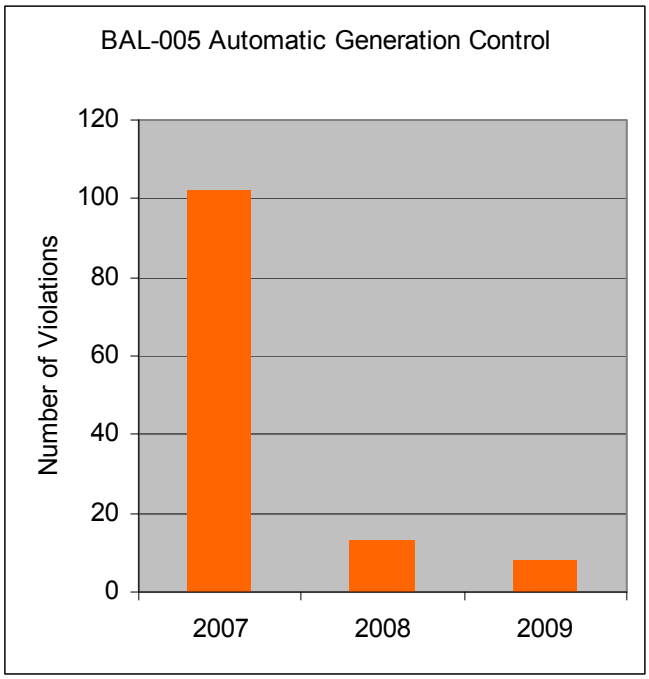
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified to comply with FERC's Guidelines, or to be consistent with previously filed NERC guidelines. With the exception of raising VSLs for binary violations to Severe as described in the December 19, 2008 filing, 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 1 Analysis of BAL-005 — Automatic Generation Control

Description of Standard
BAL-005 defines several requirements related to the implementation of Automatic Generation Control, Area Control Error, deployment of Regulating Reserve, and definitions of Balancing Area boundaries.

To date, there is only one version of the standard.

Historical Performance
For 2007, 2008, and 2009, compliance data is presented graphically based on the number of violations:



Several violations of this standard occurred in 2007, with far fewer in 2008 and 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were not established.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs for this standard.

Subsequently, on June 24, 2009, FERC approved a set of VSLs in which NERC had applied a consistent approach to assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- The VSLs for Requirement R6 have been modified to be consistent with Guideline 3.
- The VSLs for requirements R1, R3, R4, R7, R8, R11, R12, R13, and R14 have been modified for clarity and consistency with other standards and VSLs.
- Additionally, the VSLs for components of Requirement R8 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

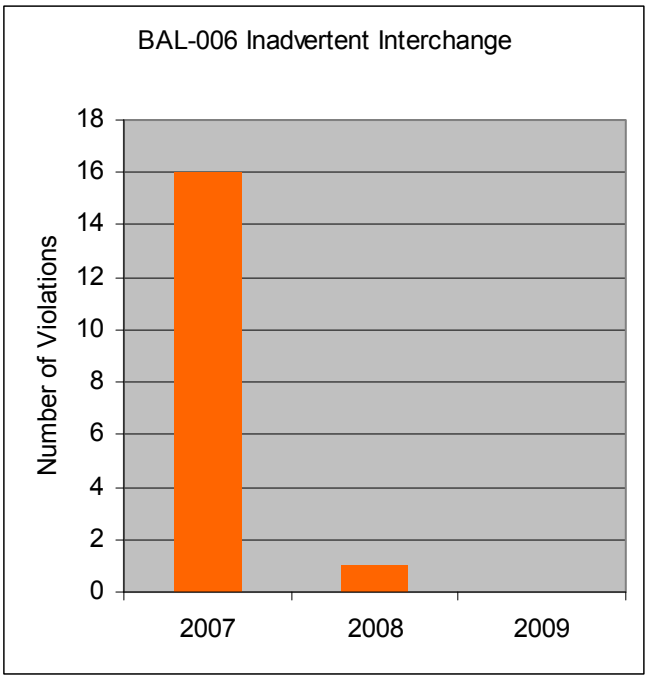
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified to comply with FERC's Guidelines and to be consistent with previously filed NERC guidelines. With the exception of raising VSLs for binary violations to Severe as described in the December 19, 2008 filing, 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 1 Analysis of BAL-006 — Inadvertent Interchange

Description of Standard
BAL-006 is intended to define processes for measuring unscheduled Interchange, so that Balancing Authorities do not excessively depend on other Balancing Authorities for meeting their balancing obligations

To date, there have been two versions of the standard — BAL-006-0, and BAL-006-1.

Historical Performance
For 2007, 2008, and 2009, compliance data is presented graphically based on the number of violations:



There were a limited number of violations, with almost all of them occurring in 2007.

Past Compliance Criteria
In Version 0 of this standard, assessment of compliance was based on whether or an entity had submitted reports of monthly Inadvertent Interchange (or an explanation of why they could not do so) to the Regional Reliability Organization by the 20th calendar day of each month.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs for this standard.

Subsequently, on June 24, 2009, FERC approved a set of VSLs assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- The VSLs for requirements R2, R3, and R5 have been modified for clarity and consistency with other standards and VSLs.
- The VSLs for requirements R1and R3 were changed from binary VSLs to gradated VSLs.
- Additionally, the VSLs for components of Requirement R4 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

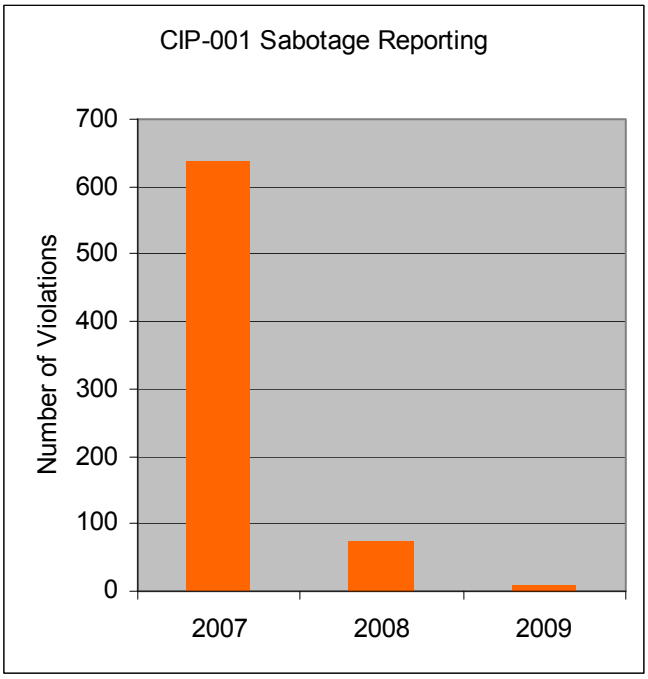
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing are consistent with those that are currently approved. With the exception of raising VSLs for binary violations to Severe as described in the December 19, 2008 filing, the VSLs have not changed 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 1 Analysis of CIP-001 — Sabotage Reporting

Description of Standard
CIP-001 is intended to ensure that all disturbances or unusual occurrences that are believed to have been a result of sabotage are reported to the appropriate entities.

To date, there is only one FERC-approved version of the standard.

Historical Performance
For 2007, 2008, and 2009, compliance data is presented graphically below based on the annual number of violations for this standard:



A significant number of violations occurred in 2007, and almost a tenth as many in 2008, and a very small number in 2009.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established to address each requirement.

Level 1 Violation	There shall be a separate Level 1 non-compliance, for every one of the following requirements that is in violation: • Does not have procedures for the recognition of and for making its operating personnel aware of sabotage events (R1). • Does not have procedures or guidelines for the communication of information concerning sabotage events to appropriate parties in the Interconnection (R2).

	• Has not established communications contacts, as specified in R4.
Level 2 Violation	Not applicable.
Level 3 Violation	Has not provided its operating personnel with sabotage response procedures or guidelines (R3).
Level 4 Violation	Not applicable.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs for this standard.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- The VSLs for Requirement R3 have been modified to be consistent with Guideline 3.
- The VSLs for Requirement R4 have been modified for clarity and consistency with other standards and VSLs.

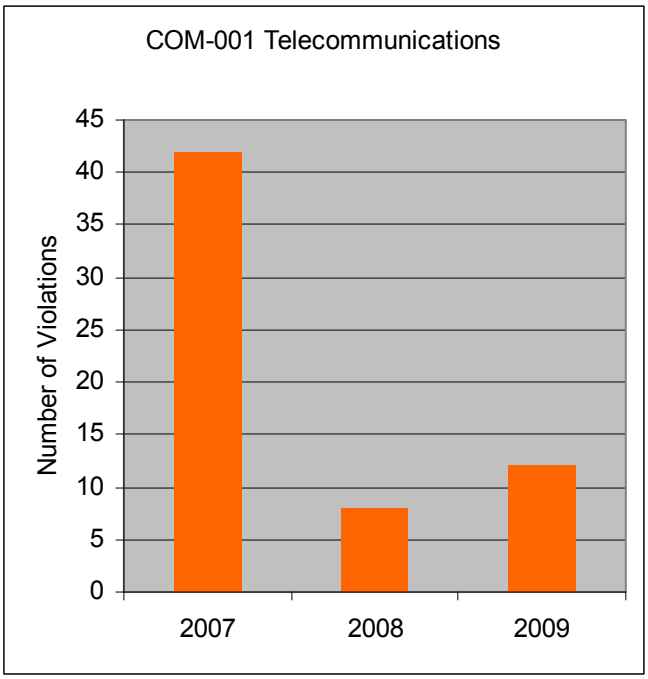
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified to comply with FERC Guidelines and for clarity and consistency. The VSLs have not changed over time, indicating improvement in performance. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of COM-001 — Telecommunications

Description of Standard
COM-001 mandates that entities have the appropriate communications facilities needed to ensure the ability to adequately exchange Interconnection and operating information with other entities in order to maintain reliability.

To date, there have been two versions of the standard — COM-001-0 and COM-001-1.

Historical Performance
For 2007, 2008, and 2009, compliance data is presented graphically below based on the annual number of violations:



There were a number of violations in 2007, far fewer in 2008, and several in 2009.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established that addressed three of the six requirements in the standard.

Level 1 Violation	Not applicable.
Level 2 Violation	Not applicable.
Level 3 Violation	There shall be a separate Level 3 non-compliance, for every one of the following requirements that is in violation:

	• The Transmission Operator, Balancing Authority or Reliability Coordinator used a language other then English without agreement as specified in R4. • There are no written operating instructions and procedures to enable continued operation of the system during the loss of telecommunication facilities as specified in R5
Level 4 Violation	Telecommunication systems are not actively monitored, tested, managed or alarmed as specified in R2.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R2, R4, and R5. The VSL for Requirement 2 was converted from a binary to a gradated VSL. Additionally, three sets of VSLs were added to address requirements R1, R3, and R6 that were not previously assigned Levels of Non-Compliance.

Subsequently, on June 24, 2009, FERC approved a set of VSLs in which NERC had applied a consistent approach to assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- The VSLs for Requirement R3 have been modified to be consistent with Guideline 3.
- The VSLs for requirements R2, R4, and R6 have been modified for clarity and consistency with other standards and VSLs.
- Additionally, the VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

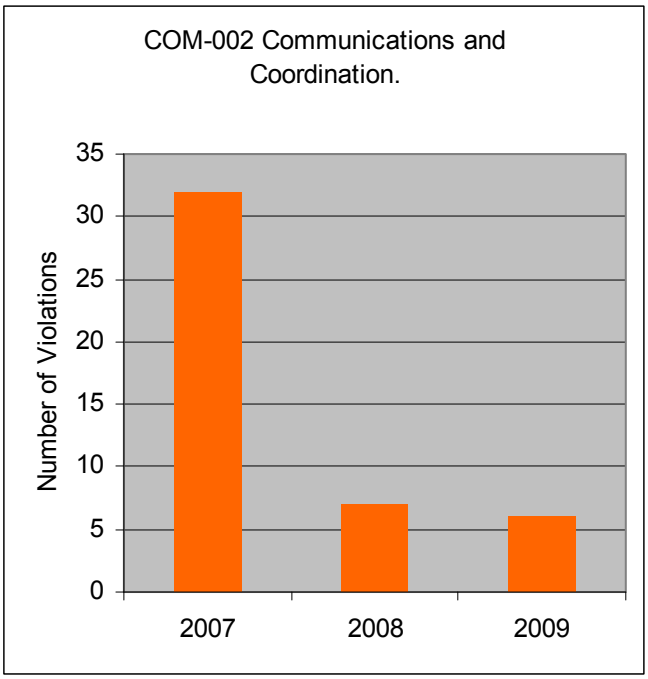
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified to comply with FERC Guidelines and for clarity and consistency. The VSLs have not changed substantively over time, indicating improvement in performance. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of COM-002 — Communications and Coordination

Description of Standard
COM-002 ensures that entities have adequate communication facilities that are staffed and available for addressing real-time emergency conditions, and that communications during those times are clear and effective.

To date, there have been three versions of the standard — COM-002-0, COM-002-1, and COM-002-2.

Historical Performance
For 2007, 2008, and 2009, compliance data is presented graphically below based on the annual number of violations:



There were a significant number of violations in 2007, but only a small number of recorded violations in 2008 and 2009.

Past Compliance Criteria
In Version 2 of this standard, Levels of Non-Compliance were established based on adherence to elements of Requirement R1.

Level 1 Violation	N/A
Level 2 Violation	N/A

Level 3 Violation	N/A
Level 4 Violation	Transmission Operator and Balancing Authority: Communication did not occur as specified in R1.1. Generator Operator: Communication facilities are not provided to address a real-time emergency condition as specified in R1.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. These VSLs incorporated the concepts from the Levels of Non-Compliance for Requirement R1. Additionally, VSLs were added to address Requirement R2, which was not previously assigned levels of Non-Compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- The VSLs for Requirement R1 have been modified to be consistent with Guidelines 2 and 3.
- The VSLs for Requirement R2 have been modified for clarity and consistency with other standards and VSLs.

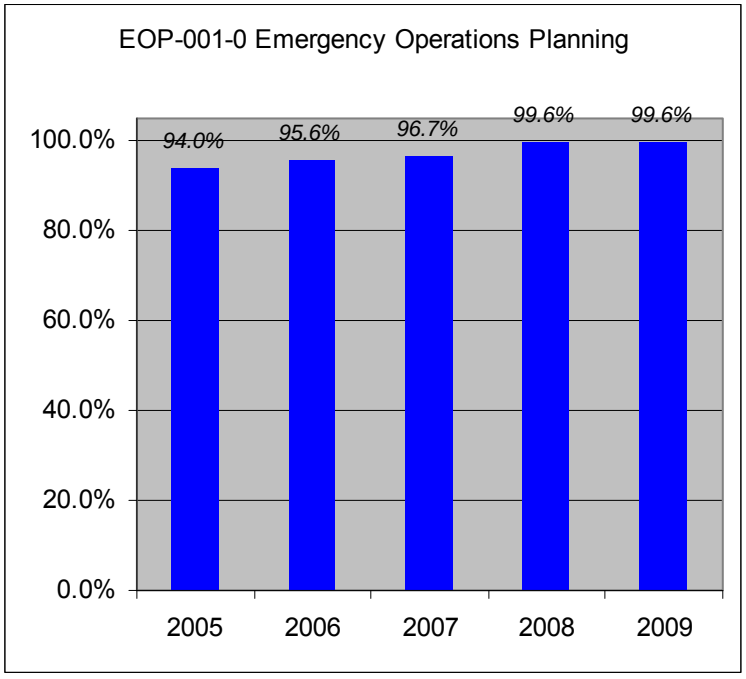
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified to comply with FERC Guidelines and for clarity and consistency. The VSLs have not changed significantly over time. Although proposed for modification, the VSLs as modified 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 1 Analysis of EOP-001 — Emergency Operations Planning

Description of Standard
EOP-001 is intended to ensure that Transmission Operators and Balancing Authorities have plans to mitigate operating emergencies, and that these plans have been developed in a coordinated fashion with other Transmission operators and Balancing Authorities, as well as the Reliability Coordinator. These plans must address key operations, such as load shedding, system restoration, generation deficiencies, and transmission emergencies.

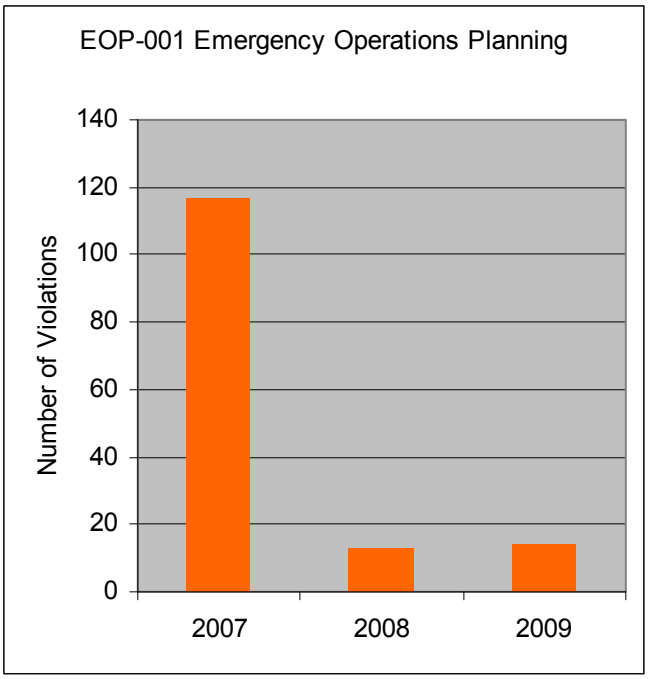
There have been two versions of the standard — EOP-001-0, and EOP-001-1. EOP-001-1 has been filed and is pending before FERC. Accordingly, it will not be discussed within this document.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is shown, based on the percentage of compliant entities, in graphical form below:



EOP-001 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There were a significant number of violations in 2007, approximately a tenth of that number in 2008, and for a similar number in 2009.

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established based on the number of elements missing from entity's plans, based on the list of elements in Attachment 1-EOP-001-0. A violation occurred if one or more elements were not included, with the most severe penalty applied where four or more components were not included, or if no plans existed.

Level 1 Violation	One of the applicable elements of Attachment 1-EOP-001-0 has not been addressed in the emergency plans.
Level 2 Violation	Two of the applicable elements of Attachment 1-EOP-001-0 have not been addressed in the emergency plans.
Level 3 Violation	Three of the applicable elements of Attachment 1-EOP-001-0 have not been addressed in the emergency plans.
Level 4 Violation	Four or more of the applicable elements of Attachment 1-EOP-001-0 has not been addressed in the emergency plans or a plan does not exist.

EOP-001-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retain the concepts used in the Level of Non-Compliance criteria and incorporate them into a new set of VSLs for R5 (but using percentages instead of discrete elements). Additionally, several additional VSLs were added to address requirements that were not previously assigned Levels of Non-Compliance.

Subsequently, on June 24, 2009, FERC approved a set of VSLs in which NERC had applied a consistent approach to assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- R1, R3.1, and R6 were revised in accordance with Guidelines 2 and 3.
- Revised the Requirement R5 VSLs to be consistent with the historical levels of Non-Compliance, using elements instead of percentages.
- Made minor modifications for clarity and consistency with other standards and VSLs.
- Eliminated VSLs from R3 main requirement, as there is no required performance in the primary requirement language.
- Removed generic VSLs from several requirements.
- VSLs for components of requirements R4 and R7 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
In 2005, 2006, 2007, and part of 2008, entities were held to compliance based on the Levels of Non-Compliance. At that time, those levels were based on a count of the elements specified in Attachment 1-EOP-001-0 that were required to be included in the entities emergency plan, but were not. Attachment 1-EOP-001-0 contains 15 elements. The Levels of Non-Compliance effectively measure 100% to 93% as a Level 1 Violation, 93% to 87% as a Level 2 Violation, 87% to 80% as a Level 3 Violation, and less than 80% compliance as a Level 4 Violation. However, the VSLs approved in the June 19, 2008 Order use a different percentage to evaluate compliance, measuring 100% to 90% as a Low Violation, 90% to 70% as a Moderate Violation, 70% to 50% as a High Violation, and less than 50% compliance as a Severe Violation. This has the potential effect of lowering the thresholds of non-compliance. For this reason, the VSLs for Requirement R5 have been modified to be consistent with the levels used prior to June 2008.

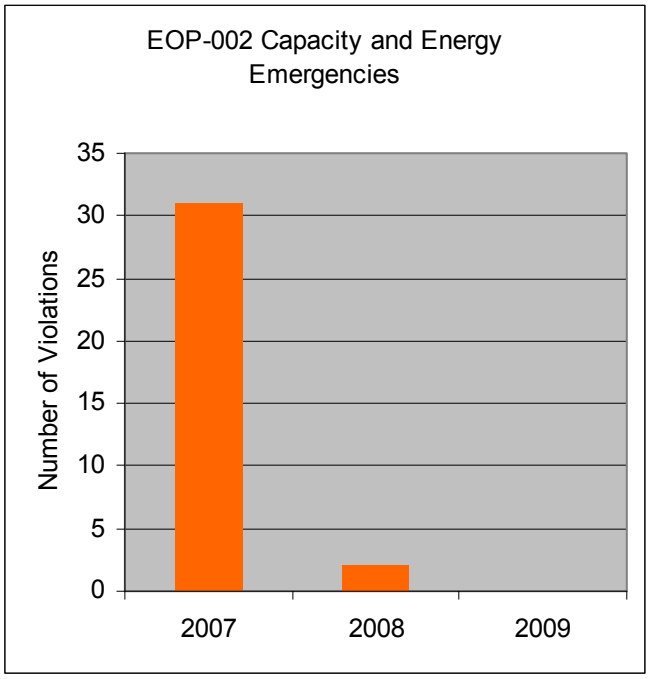
As all the other VSLs were not included in the Levels of Non-Compliance originally, they are additions to the set. NERC believes that they do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of EOP-002 — Capacity and Energy Emergencies

Description of Standard
EOP-002 is intended to ensure that Reliability Coordinators and Balancing Authorities are prepared for capacity and energy emergencies.

To date, there have been three versions of the standard — EOP-002-0, EOP-002-1, and EOP-002-2.

Historical Performance
For 2007, 2008, and 2009, compliance data is presented graphically based on the number of violations:



There were a number of violations in 2007, far less in 2008, and none to date in 2009.

Past Compliance Criteria
In Version 2 of this standard, Levels of Non-Compliance were established for requirements R1, R2, R3, R8, and parts of Requirement R9.

Level 1 Violation	Reliability Coordinator: • Did not submit the report to NERC as required in R9.2. Balancing Authority: N/A
Level 2 Violation	Reliability Coordinator: N/A Balancing Authority:

	• Did not provide evidence that it has the responsibility and clear decision-making authority in accordance with R1.
Level 3 Violation	Reliability Coordinator: N/A Balancing Authority: N/A
Level 4 Violation	Reliability Coordinator: • One or more of the actions of the Capacity and Energy Emergency Plans were not implemented as appropriate. (R2) • There is no evidence an Emergency Alert was issued as specified in R8 • Failed to comply with R9.3 or R9.4 • Did not provide evidence that it has the responsibility and clear decision making authority in accordance with R1. Balancing Authority: • Failed to communicate its current and future system conditions to its Reliability Coordinator and neighboring Balancing Authorities when in an operating Capacity or Energy Emergency (R3). One or more of the actions of the Capacity and Energy Emergency Plans were not implemented as appropriate (R2).

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retain the criteria used in the Level of Non-Compliance criteria and incorporate them into VSLs for requirements R1, R2, R3, R8 and R9. Additionally, several VSLs were added to address requirements R4, R5, R6, and R7 that were not previously assigned levels of Non-Compliance.

Subsequently, on June 24, 2009, FERC approved a set of VSLs in which NERC had applied a consistent approach to assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R1 to be consistent with FERC Guidelines 2 and 4.
- Modified the VSLs for requirements R2, R3, R6, R7, R8, and R9.1 to be consistent with FERC Guideline 3.
- Modified the VSLS for requirements R1, R3, R4, R5, R7, R8, R9.2, R9.3 and R9.4 to be consistent with FERC Guideline 2.
- Modified the VSLs for requirements R4, R5 and R6 for clarity and consistency with other standards and VSLs.
- Eliminated VSLs from R9 main requirement, as there is no required performance in the primary requirement language.

- VSLs for components of requirements R6 and R7 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.
- The VSLs for requirement R1 were changed from binary VSLs to gradated VSLs.

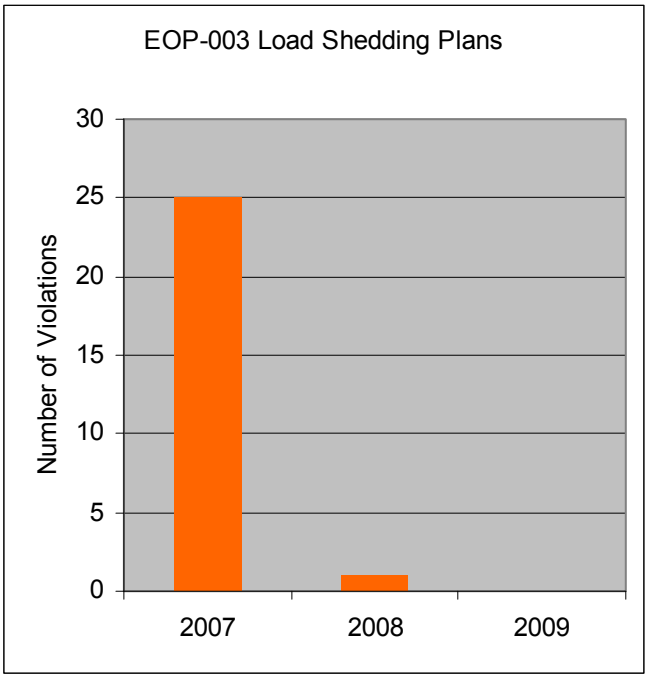
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for a variety of reasons as outlined above. The compliance data is limited. With the exception of requirement R9.2, which was raised from Level 1 Non-Compliance to a Severe VSL, 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 1 Analysis of EOP-003 — Load Shedding Plans

Description of Standard
EOP-003 requires that a Balancing Authority or Transmission Operator operating with insufficient generation or transmission capacity must have the capability and authority to shed load rather than risk an uncontrolled failure of the Interconnection.

To date, there have been two versions of the standard — EOP-003-0 and EOP-003-1.

Historical Performance
For 2007, 2008, and 2009, compliance data is presented graphically based on the number of violations:



There were a number of violations in 2007, far fewer in 2008, and none to date in 2009.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for requirements R2 and R8.

Level 1 Violation	N/A
Level 2 Violation	N/A
Level 3 Violation	N/A
Level 4 Violation	• Does not have an automatic load shedding plan as specified in R2. • Does not have manual load shedding plans as specified in R8.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retain the criteria used in the Level of Non-Compliance criteria and incorporate them into VSLs for requirements R2 and R8. Additionally, several VSLs were added to address requirements R1, R3, R4, R5, R6, and R7 that were not previously assigned levels of Non-Compliance.

On July 21, 2008, NERC filed changes to these VSLs based on directives from FERC. On November 20, 2008, FERC accepted changes to some of the VSLs in EOP-003 proposed by NERC.

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R1, R2, R3, R5, R6, R7, and R8 for clarity and consistency with other standards and VSLs

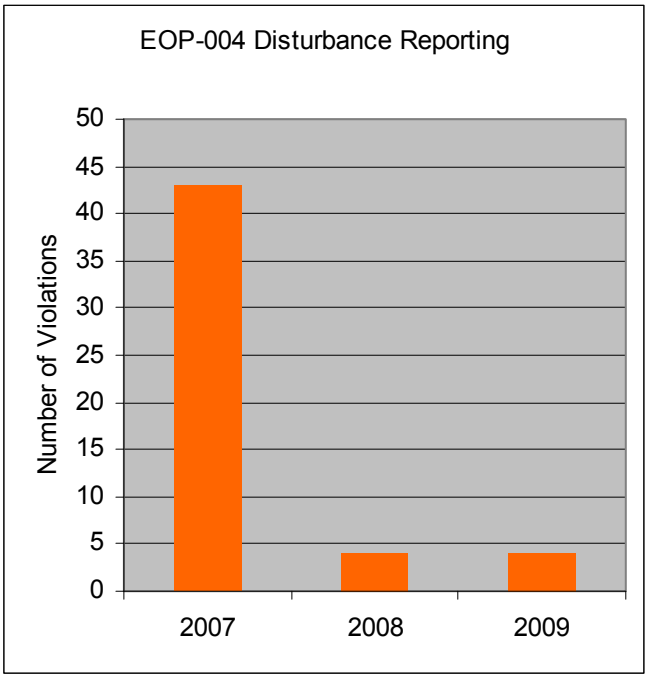
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for clarity and consistency. The compliance data on this standard is limited, With the exception of adding VSLs, the VSLs have not changed significantly over time. Although 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 1 Analysis of EOP-004 — Disturbance Reporting

Description of Standard
EOP 004 requires that reports be created for study and evaluation whenever a disturbance or unusual event occurs that jeopardizes the operations of the bulk electric system or results in system equipment damage or customer interruptions.

To date, there have been two versions of the standard — EOP-004-0 and EOP-004-1.

Historical Performance
For 2007, 2008, and 2009, compliance data is presented graphically based on the number of violations:



There were a number of violations in 2007, less than a tenth of that number in 2008, and a similar number in 2009.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for requirements R1 and R3.

Level 1 Violation	Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, Load Serving Entity: • Failed to prepare and deliver the NERC Interconnection Reliability Operating Limit and Preliminary Disturbance Reports to NERC within 24 hours of its recognition as specified in Requirement 3.1 • Failed to provide disturbance information verbally as time permitted, when system conditions precluded the preparation of a report in 24 hours as specified in R3.3

	• Failed to prepare a final report within 60 days as specified in R3.4
Level 2 Violation	N/A
Level 3 Violation	N/A
Level 4 Violation	Regional Reliability Organization: No current procedure to facilitate preparation of preliminary and final disturbance reports as specified in R1.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retain the criteria used in the Level of Non-Compliance criteria and incorporate them into VSLs for both requirements R1 and R3. Additionally, VSLs were added to address requirements R2, R4, and R5 that were not previously assigned levels of Non-Compliance.

Subsequently, on June 24, 2009, FERC approved a set of VSLs in which NERC had applied a consistent approach to assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R3.3 and R3.4 to be consistent with FERC Guideline 2.
- Modified the VSLs for Requirements R3.1 and R3.3 to be consistent with FERC Guideline 3.
- Modified the VSLs for requirements R2, R3, R3.1, and R3.4 for clarity and consistency with other standards and VSLs.
- Removed R1, R4, and R5 VSLs, as they are not applicable to a user, owner, or operator of the BES.

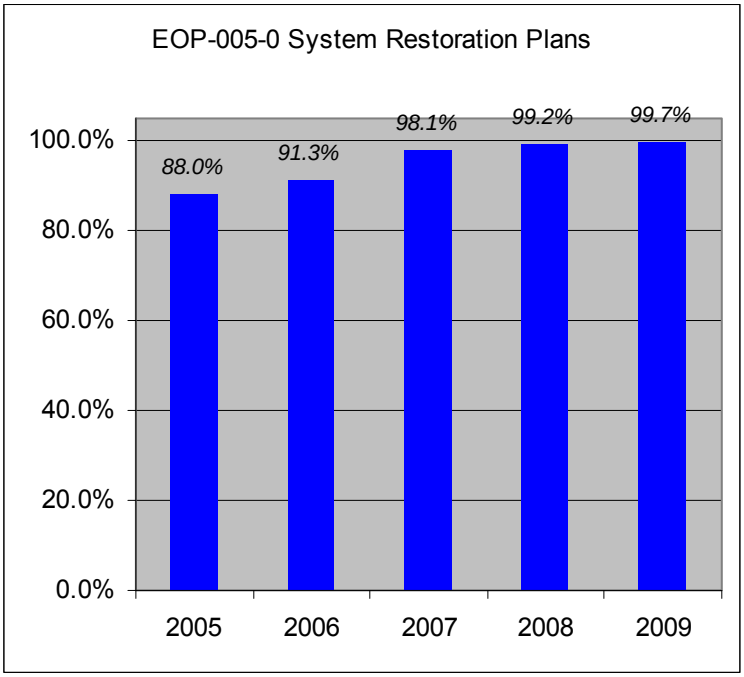
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. With the exception of adding VSLs, the VSLs have not changed significantly over time. Although proposed 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 1 Analysis of EOP-005 — System Restoration Plans

Description of Standard
EOP-005 is intended to ensure that plans, procedures, and resources are available to restore the electric system to a normal condition in the event of a partial or total shutdown.

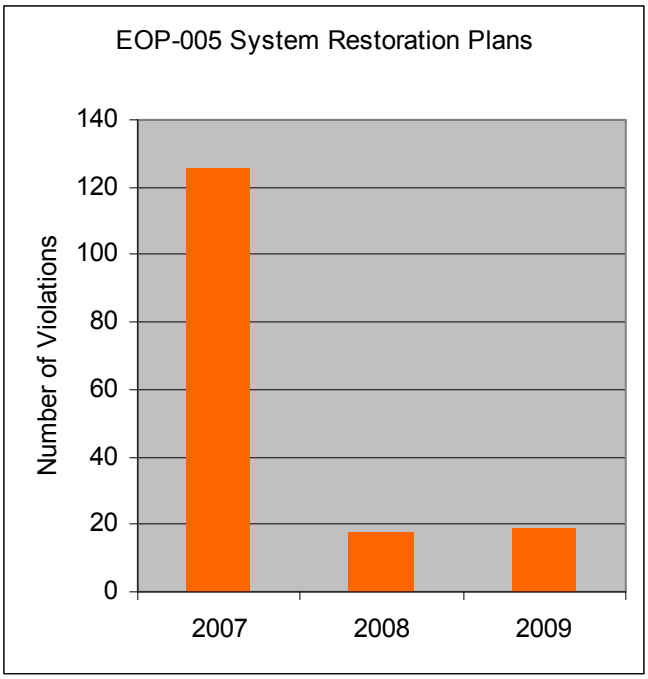
To date, there have been two versions of the standard: EOP-005-0, and EOP-005-1.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is shown based on the percentage of compliant entities in graphical form below:



EOP-005 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There were a significant number of violations in 2007, less than one fifth that number in 2008, and a similar number in 2009.

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established based on the number of elements missing from the entity's plans, based on the list of elements in Attachment 1-EOP-005-0. This essentially addressed requirements R1 and R2, but none of the other requirements.

Level 1 Violation	Plan exists but is not reviewed annually
Level 2 Violation	Plan exists but does not address one of the elements listed in Attachment 1-EOP-005-0
Level 3 Violation	N/A
Level 4 Violation	Plan exists but does not address two or more of the requirements in Attachment 1-EOP-005-0, or there is no restoration plan in place.

EOP-005-0 Levels of Non-Compliance

Version 1 of this standard added new requirements. In general, Version 1 maintained Levels of Non-Compliance that were similar to those from Version 0, but included an additional criterion related to Requirement R9:

Level 1 Violation	Plan exists but is not reviewed annually
Level 2	Plan exists but does not address one of the elements listed in Attachment 1-EOP-

Violation	005-0
Level 3 Violation	Did not make available documentation showing the number, size, and location of system blackstart generating units and the associated Cranking Paths.
Level 4 Violation	Plan exists but does not address two or more of the requirements in Attachment 1-EOP-005-0, or no restoration plan in place.

EOP-005-1 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retain much of the criteria used in the Level of Non-Compliance criteria and translate them directly to VSLs for requirements R1, R2, and R9, but in the case of R1, moved to a percentage approach. Several additional VSLs were added to address requirements that were not previously assigned Levels of Non-Compliance (R3, R4, R5, R6, R7, R8, R10, and R11).

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Replaced the VSLs for requirements R5 and R7 with binary Severe VSLs.
- VSLs for components of Requirement R11 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.
- Modified numbers and percentages used in measuring severity.
    - In accordance with Guideline 1, the R1 VSLs have been modified to be consistent with the criteria established in the Levels of Non-Compliance.
    - R6, R7, R10, and R11 have been modified to be more stringent.
- Style changes to improve clarity.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
In 2005, 2006, 2007, and part of 2008, entities were held to compliance based on the Levels of Non-Compliance. At that time, those levels were based on a count of the elements specified in Attachment 1-EOP-005-0 that were required to be included in the entities emergency plan, but were not. The Levels of Non-Compliance treated a case where one of the nine elements specified in the attachment was missing (11% non-compliant) as a Level 2 violation, and the case where more than two of the nine elements were missing (22% compliant or worse) as a Level 4 violation. However, the VSLs approved in the June 19, 2008 Order use a percentage to evaluate compliance, measuring 100% to 75% as a Low Violation,75% to 50% as a Moderate Violation, 50% to 25% as a High Violation, and less than 25% compliance as a Severe Violation. This has the potential effect of lowering the thresholds of non-compliance. For this reason, the VSLs for Requirement R1 have been modified to be consistent with the levels used prior to June 2008.

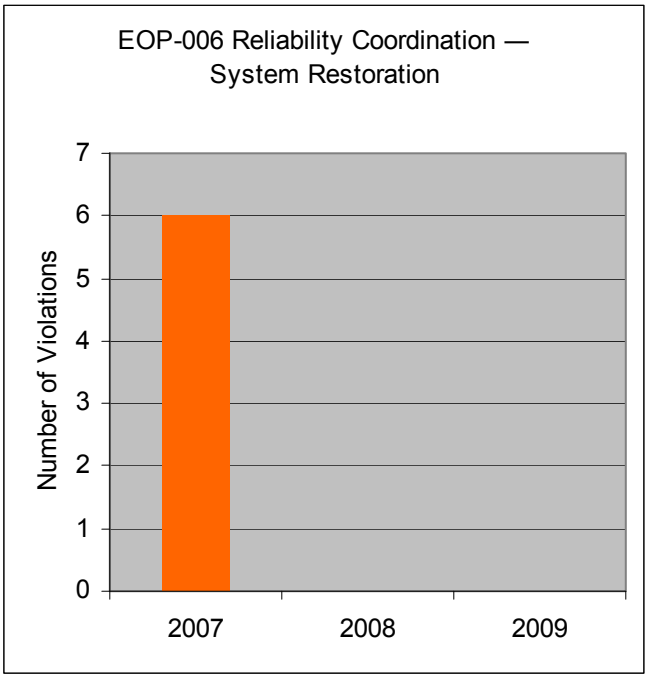
As all the other VSLs were not included in the Levels of Non-Compliance originally, they are additions to the set. NERC believes that they do not have the effect of decreasing reliability below historic levels. Modifying requirements R5 and R7 to use binary VSLs has made the requirements more stringent, as have the changes to numbers and percentages.

Guideline 1 Analysis of EOP-006 — Reliability Coordination — System Restoration

Description of Standard
EOP-006 describes the role and responsibilities of the Reliability Coordinator during system restoration, particularly with regard to prioritizing Interconnection restoration.

To date, there have been two versions of the standard — EOP-006-0, and EOP-006-1.

Historical Performance
For 2007, 2008, and 2009, compliance data is presented graphically based on the number of violations:



There were six violations in 2007, and none in 2008 and 2009.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for each of the six requirements in the standard

Level 1 Violation	• Did not have one of the Transmission Operator restoration plans within the Reliability Coordinator's Area as specified in R1.
Level 2 Violation	N/A
Level 3 Violation	• Does not have a Reliability Coordinator Restoration plan that defines the requirement of the Reliability Coordinator to provide coordination between individual Transmission Operator restoration plans as specified

	in R3. • No evidence it served as the primary contact to disseminate information to neighboring Reliability Coordinators, Transmission Operators and Balancing Authorities that were not immediately involved in restoration. (Requirement 4).
Level 4 Violation	• Did not have two or more of the Transmission Operator restoration plans within the Reliability Coordinator's Area as specified in R1. • Did not monitor restoration progress and coordinate assistance as specified in R2. • Did not approve, communicate, and coordinate the re-synchronizing of major system islands or synchronizing points as specified in R5. • Did not take action in accordance with its restoration plan to return to normal operations once an operating emergency was mitigated as specified in R6.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retain the criteria used in the Level of Non-Compliance criteria and incorporate them into VSLs for each of the requirements.

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R1, R3, and R5 for clarity and consistency with other standards and VSLs.
- Modified the VSLs for requirements R3 and R4 to be consistent with FERC Guideline 3.
- Modified the VSLs for Requirements R1, R3, R4, R5, and R6 to be consistent with FERC Guideline 2.

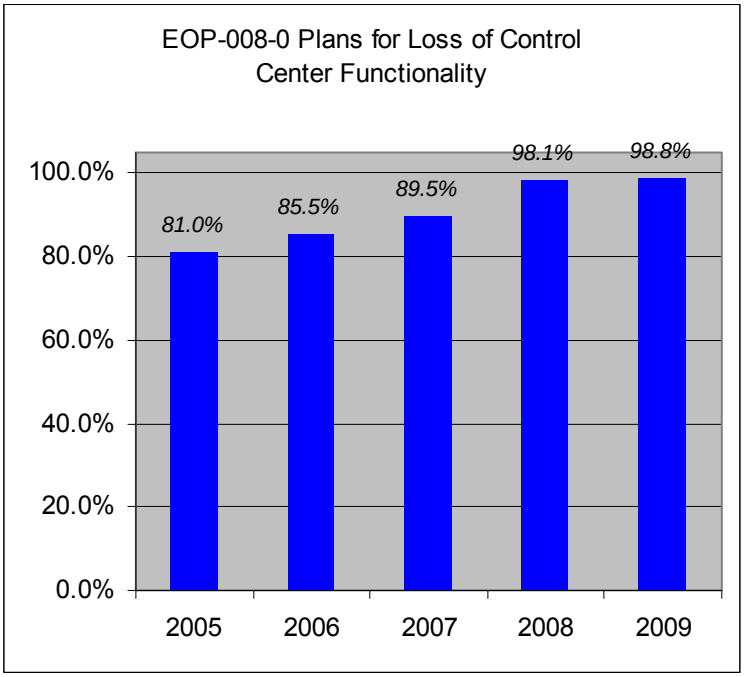
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. The compliance data on this standard is limited, while the VSLs have not changed significantly over time. 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 1 Analysis of EOP-008 — Plans for Loss of Control Center Functionality

Description of Standard
EOP-008 requires that each reliability entity must have a plan to continue reliability operations in the event its control center becomes inoperable.

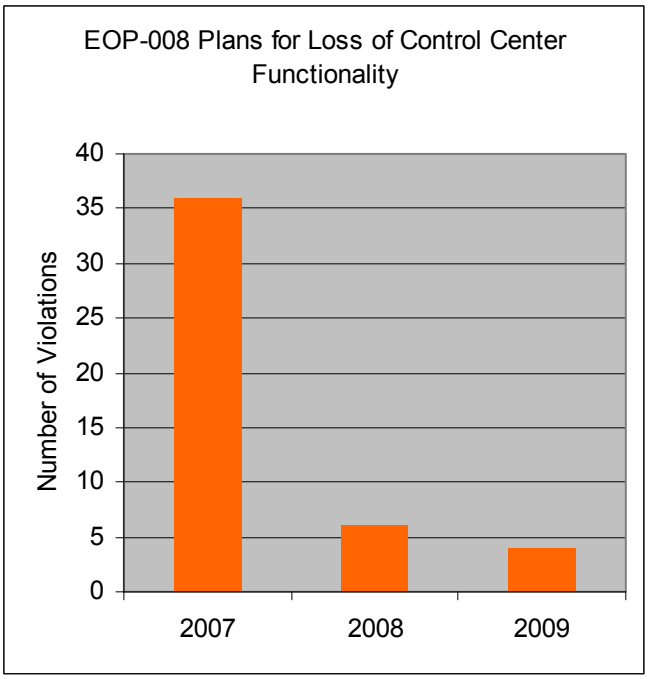
To date, there is only one FERC-approved version of the standard.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is shown, based on the percentage of compliant entities, in graphical form below:



EOP-008 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There were a significant number of violations in 2007, less than one fifth of that number in 2008, and fewer in 2009.

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established based on the quality of the contingency plan and its implementation.

Level 1 Violation	NA
Level 2 Violation	A contingency plan has been implemented and tested, but has not been tested in the past year or there are no records of shift operating personnel training
Level 3 Violation	A contingency plan has been implemented, but does not include all of the elements contained in Requirements R1.1 – R1.8
Level 4 Violation	A contingency plan has not been developed, implemented, and tested.

EOP-008-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retain the majority of the criteria used in the Level of Non-Compliance criteria and translate them to VSLs for requirements R1, 1.5, and 1.6; however, while the Levels of Non-Compliance treat the omission of a one or more elements defined in R1.1 through 1.8 as a Level 3 violation, the VSLs treat an omission of one of the items as a Lower violation, two as a Moderate violation, three as a High violation, and four or more as a Severe violation. This has the potential effect of lowering the thresholds of non-compliance. Additionally, several additional VSLs were added to address requirements that were not previously assigned Levels of Non-Compliance.

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.
- In order to comply with Guideline 1, elevation of the VSLs such that a single omission of one of the items results in a High violation, and two or more results in a Severe violation. This modification makes the VSLs consistent with the Levels of Non-Compliance.

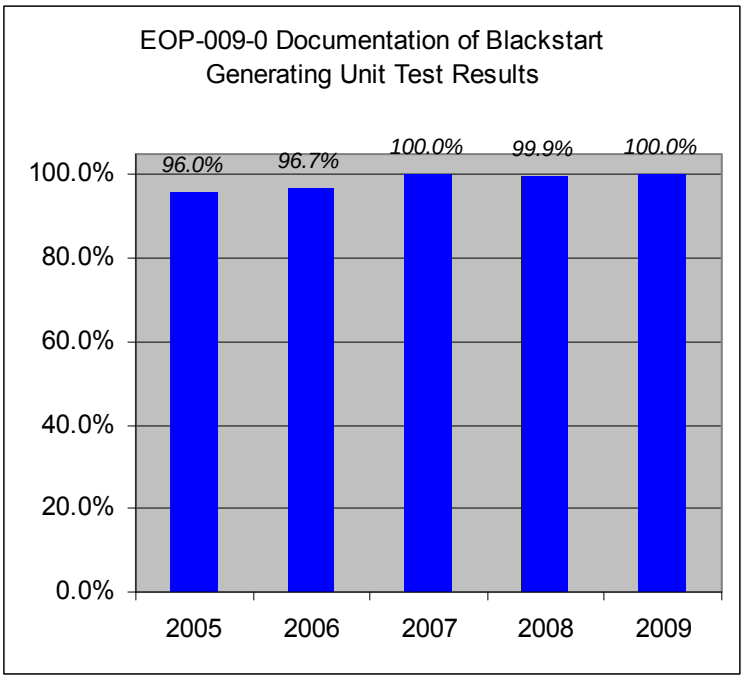
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were similar to those defined in the original Levels of Non-Compliance; however, while the Levels of Non-Compliance treat the omission of a one or more elements defined in R1.1 through 1.8 as a Level 3 violation, the VSLs treat an omission of one of the items as a Lower violation, two as a Moderate violation, three as a High violation, and four or more as a Severe violation For this reason, the VSLs for Requirement R1 have been modified to be consistent with the levels used prior to June 2008. As a result, NERC believes that these proposed VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of EOP-009 — Documentation of Blackstart Generating Unit Test

Description of Standard
EOP-005 is intended to ensure Blackstart Capability Plans exist to ensure that the quantity and location of system blackstart generators are sufficient and they can perform their expected functions during system restoration.

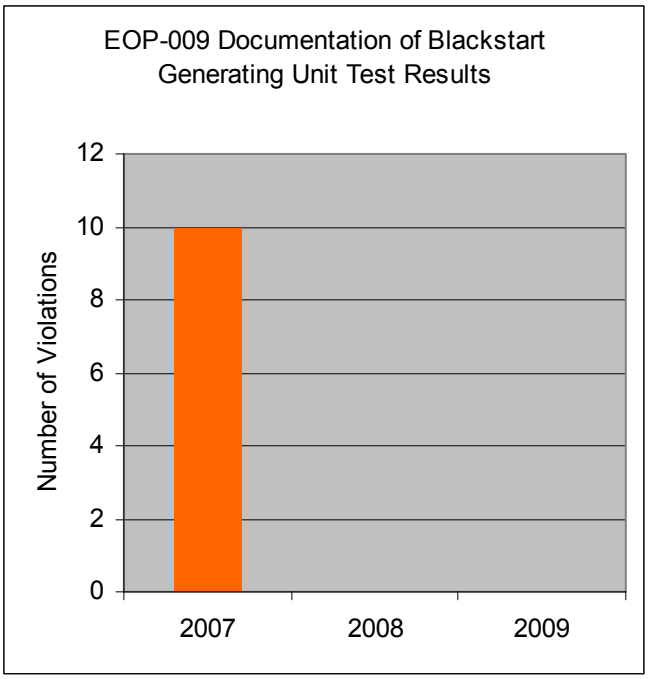
To date, there is only one FERC-approved version of the standard.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is shown, based on the percentage of compliant entities, in graphical form below:



EOP-009 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There were a limited number of violations in 2007, and none in 2008 and 2009.

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established based on whether or not blackstart units were tested or not and whether the results of those tests were documented or not.

Level 1 Violation	Startup and operation testing of each blackstart generating unit was performed, but the documentation was incomplete.
Level 2 Violation	Not applicable.
Level 3 Violation	Startup and operation testing of a blackstart unit was only partially performed.
Level 4 Violation	Startup and operation testing of each blackstart generating unit was not performed.

EOP-009-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retain the criteria used in the Level of Non-Compliance criteria and translate them to VSLs for requirements R1 and R2; however, the VSLs for R1 were modified to use percentages of units tested and percentages of documentation completed (potentially lowering the thresholds of non-compliance), and somewhat ambiguous language was added that was not reflected in the Levels of Non-Compliance.

Proposed Compliance Criteria
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- In order to comply with FERC Guideline 1, the VSLs for R1 were modified to be consistent with the Levels of Non-Compliance.
- Replaced Requirement R2 VSLs with binary Severe VSL according to Guideline 3.
- Revised R2 in accordance with Guideline 2.

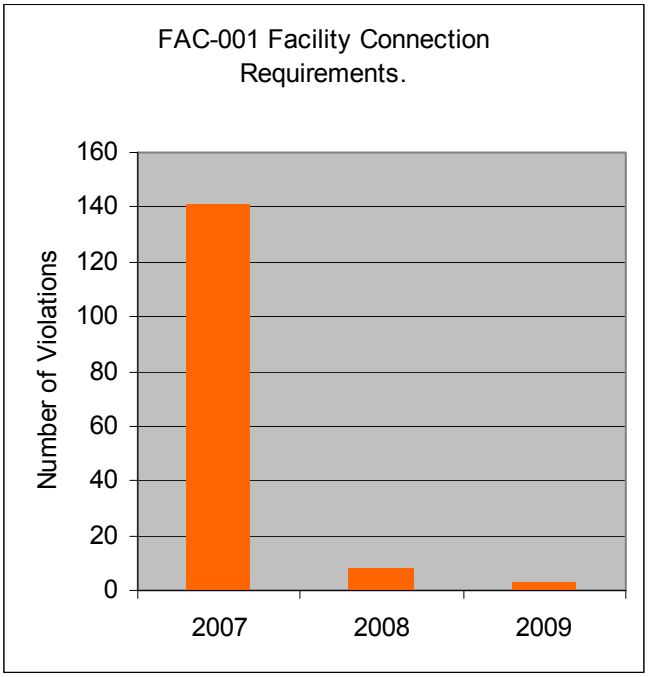
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were less stringent than those defined in the original Levels of Non-Compliance. The proposed VSLs have been made consistent with the Levels of Non-Compliance by eliminating the percentages in R1, and made more stringent by eliminating options for partial compliance with the binary VSL in R2. Performance appears to be tracking consistent with prior years. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of FAC-001 — Facility Connection Requirements

Description of Standard
FAC-001 provides that Transmission Owners must establish facility connection and performance requirements.

To date, there is only one FERC-approved version of the standard.

Historical Performance
2007, 2008, and 2009 compliance data is presented graphically below based on the number of annual violations:



There were a significant number of violations in 2007, approximately 5% of that number in 2008, and even less in 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for each requirement.

Level 1 Violation	Facility connection requirements were provided for generation, transmission, and end-user facilities, per Reliability Standard FAC-001-0_R1, but the document(s) do not address all of the requirements of Reliability Standard FAC-001-0_R2.
Level 2 Violation	Facility connection requirements were not provided for all three categories (generation, transmission, or end-user) of facilities, per Reliability Standard FAC-001-0_R1, but the document(s) provided address all of the requirements of Reliability Standard FAC-001-0_R2.
Level 3	Facility connection requirements were not provided for all three categories (generation, transmission, or end-user) of facilities, per Reliability Standard FAC-

Violation	001-0_R1, and the document(s) provided do not address all of the requirements of Reliability Standard FAC-001-0_R2.
Level 4 Violation	No document on facility connection requirements was provided per Reliability Standard FAC-001-0_R3.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into the VSLs for requirements R1, R2, and R3.

Subsequently, on June 24, 2009, FERC approved a set of VSLs in which NERC had applied a consistent approach to assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R1 to be consistent with FERC Guideline 2 and 3.
- Modified the VSLs for requirements R2 and R3 for clarity and consistency with other standards and VSLs
- VSLs for components of requirements R1 and R2 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

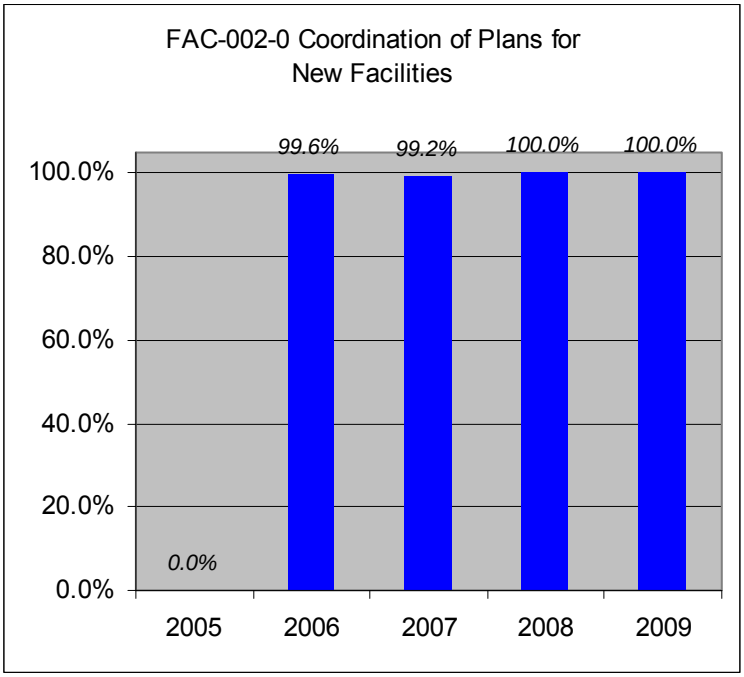
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. The compliance data is limited, while the VSLs have not changed significantly over time. Although proposed 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 1 Analysis of FAC-002 — Coordination of Plans for New Facilities

Description of Standard
FAC-002 defines facility connection and performance requirements for new facilities in order to avoid adverse impacts on reliability due to the interconnection of those facilities.

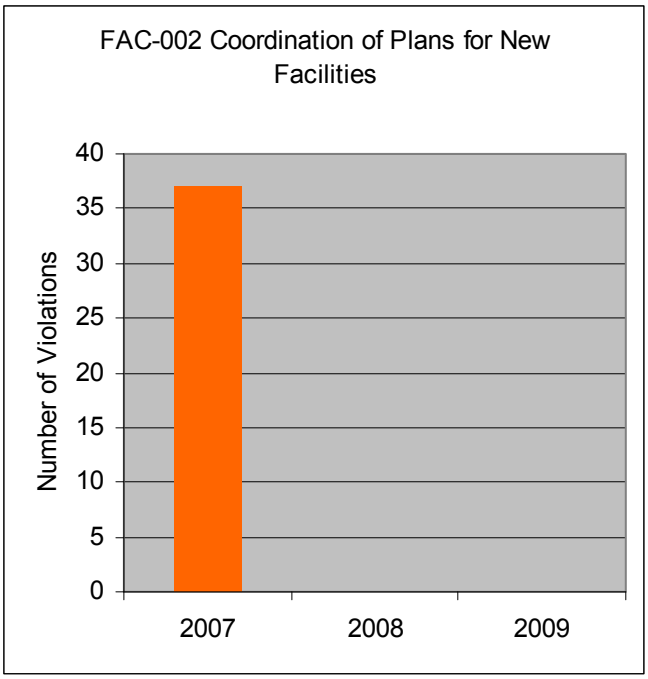
To date, there is only one FERC-approved version of the standard.

Historical Performance
NERC has compliance data for this standard for 2006, 2007, 2008, and 2009. This data is charted below based on the annual percentage of compliant entities.



FAC-002 Historical Performance

2007, 2008, and 2009 data is presented graphically below based on the number of annual violations:



There were several violations in 2007, but none so far for 2008 and 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established based on the assessments performed to determine the reliability impact of interconnecting new facilities.

Level 1 Violation	Assessments of the impacts of new facilities were provided, but were incomplete in one or more requirements of Reliability Standard FAC-002_R1.
Level 2 Violation	Not applicable.
Level 3 Violation	Not applicable.
Level 4 Violation	Assessments of the impacts of new facilities were not provided.

FAC-002-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and translated them to VSLs for requirements R1 and R2. Additionally, more detail was added to recognize the possibility of partial compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirement.
- VSLs for Requirement R2 were modified to be consistent with FERC Guideline 2 and 3.
- VSLs for Requirement R1 were modified for clarity and consistency with other standards and VSLs.

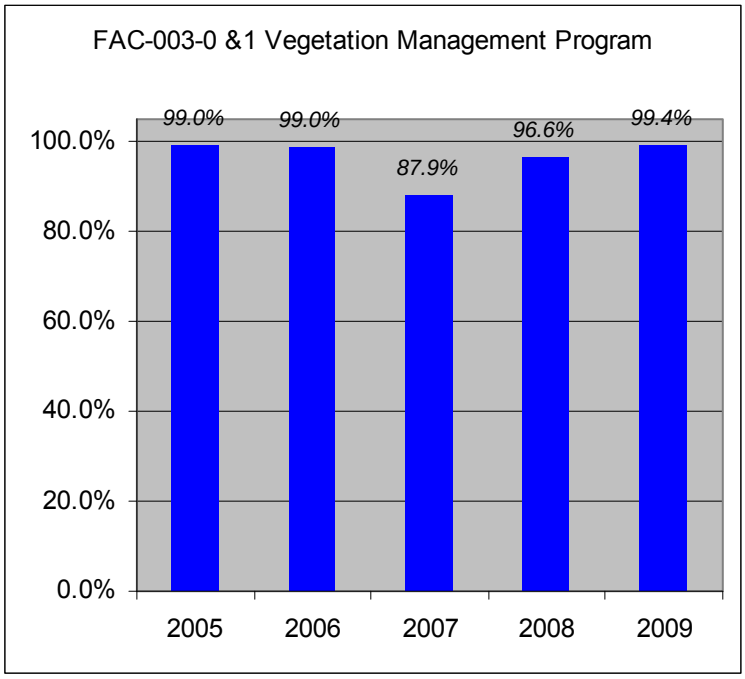
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were equally or more stringent than those defined in the original Levels of Non-Compliance. The proposed VSLs have been made more stringent by shortening the durations within which an entity may be found to be partially compliant. Compliance data is limited, while the VSLs have not changed significantly. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of FAC-003 — Vegetation Management Program

Description of Standard
FAC-003 requires that Transmission Owners establish vegetation management programs to prevent transmission line contact with vegetation, and to ensure that related outages are appropriately reported.

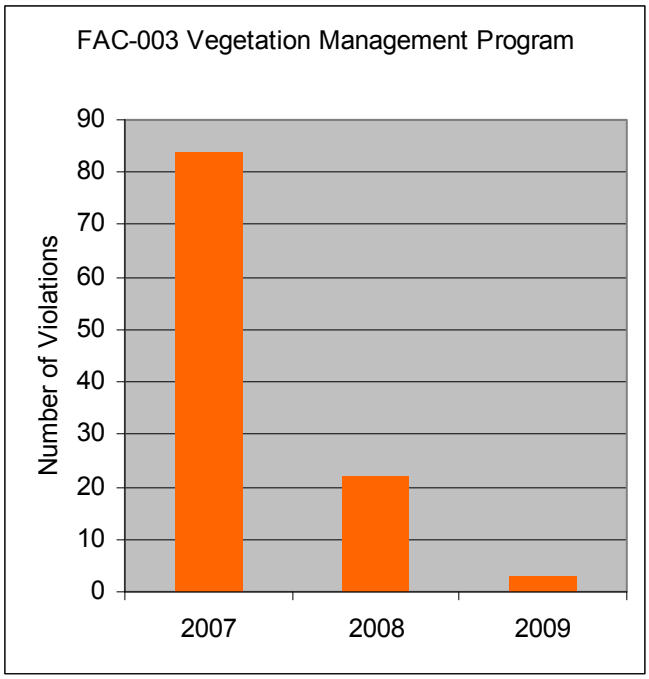
To date, there have been two versions of the standard.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is charted below based on the annual percentage of compliant entities:



FAC-003 Historical Performance

2007, 2008, and 2009 data is presented graphically below based on the number of annual violations:



There were a significant number of violations in 2007, approximately one quarter of that number in 2008, and far fewer in 2009.

Past Compliance Criteria
Version 0 of the standard did not have Levels of Non-Compliance defined.

In Version 1 of this standard, Levels of Non-Compliance were established based on the quality of the vegetation management program, how well the plan was followed, and whether incident reporting was handled adequately.

Level 1 Violation	The TVMP was incomplete in one of the requirements specified in any subpart of Requirement 1, or; Documentation of the annual work plan, as specified in Requirement 2, was incomplete when presented to the Compliance Monitor during an on-site audit, or; The RRO provided an outage report to NERC that was incomplete and did not contain the information required in Requirement 4.
Level 2 Violation	The TVMP was incomplete in two of the requirements specified in any subpart of Requirement 1, or; The Transmission Owner was unable to certify during its annual self-certification that it fully implemented its annual work plan, or documented deviations from, as specified in Requirement , or; The Transmission Owner reported one Category 2 transmission vegetation-related outage in a calendar year.
Level 3 Violation	The Transmission Owner reported one Category 1 or multiple Category 2 transmission vegetation-related outages in a calendar year, or;

	The Transmission Owner did not maintain a set of clearances (Clearance 2), as defined in Requirement 1.2.2, to prevent flashover between vegetation and overhead ungrounded supply conductors, or; The TVMP was incomplete in three of the requirements specified in any subpart of Requirement 1.
Level 4 Violation	The Transmission Owner reported more than one Category 1 transmission vegetation-related outage in a calendar year, or; The TVMP was incomplete in four or more of the requirements specified in any subpart of Requirement 1.

FAC-003-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and translated them to VSLs for requirements R1, R2, R3, and R4. Additionally, several additional VSLs were added to provide additional detail and to address certain aspects of requirements that were not previously assigned Levels of Non-Compliance.

On July 21, 2008, NERC filed changes to these VSLs based on directives from FERC. On November 20, 2008, FERC accepted changes to some of the VSLs in FAC-003 proposed by NERC. Subsequently, on June 24, 2009, FERC approved a set of VSLs in which NERC had applied a consistent approach to assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Reduced magnitude of allowable percentages in Requirement R1.3 for persons not holding appropriate qualifications and training.
- Modified the VSLs for requirements R1, R1.3, R1.4, and R2 for clarity and consistency with other standards and VSLs in accordance with Guideline 2.
- Modified the VSLs for requirements R1.2, R1.2.1, R1.2.2, and R1.5 to be consistent with FERC Guideline 3.
- VSLs for components of Requirement R3 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirement.
- Removed R4 VSLs, as they are not applicable to a user, owner, or operator of the BES.

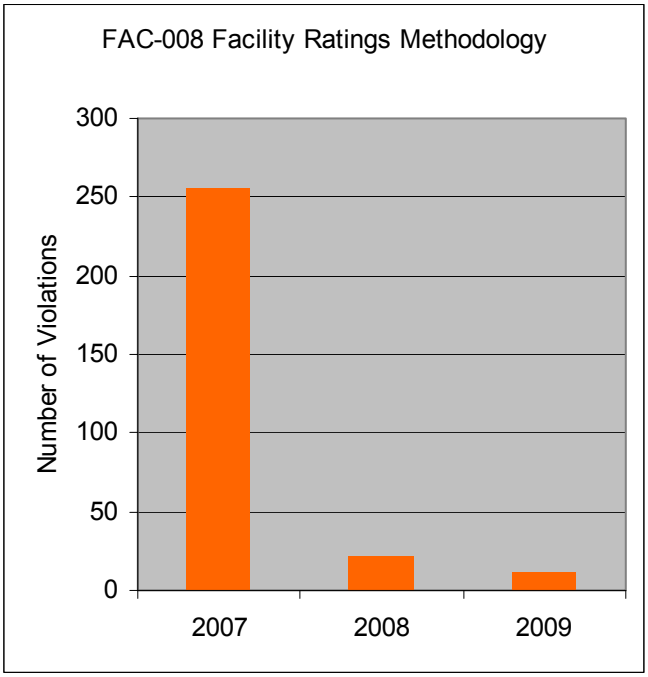
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were equally or more stringent than the original Levels of Non-Compliance. The proposed VSLs have been made more stringent by reducing the range within which an entity may be found to be partially compliant with Requirement R1.3. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of FAC-008 — Facility Ratings Methodology

Description of Standard
FAC-008 is intended to ensure that the ratings used to plan and operate the bulk electric system are determined based on an established methodology.

To date, there is only one FERC-approved version of the standard.

Historical Performance
2007, 2008, and 2009 compliance data is presented graphically below based on the annual number of violations:



There were a significant number of violations in 2007, less than one tenth of that number in 2008, and even fewer in 2009.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established based on requirements R1, R2, and R3.

Level 1 Violation	• The Facility Ratings Methodology does not contain a statement that a Facility Rating shall equal the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility. (R1.1) • The Facility Ratings Methodology does not address one of the required equipment types identified in FAC-008 R1.2.1. • No evidence of responses to a Reliability Coordinator's, Transmission Operator, Transmission Planner, or Planning Authority's comments on the Facility Ratings Methodology. (R1.3)

Level 2 Violation	• The Facility Ratings Methodology is missing the assumptions used to determine Facility Ratings or does not address two of the required equipment types identified in FAC-008 R1.2.1.
Level 3 Violation	• The Facility Ratings Methodology does not address three of the required equipment types identified in FAC-008-1 R1.2.1.
Level 4 Violation	• The Facility Ratings Methodology does not address both Normal and Emergency Ratings (R1.2.2) • The Facility Ratings Methodology was not made available for inspection within 15 business days of receipt of a request. (R2)

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into to VSLs for requirements R1, R2, and R3. Additional detail was added to address sub- requirements that were not previously assigned Levels of Non-Compliance.

Subsequently, on June 24, 2009, FERC approved a set of VSLs in which NERC had applied a consistent approach to assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R2 and R3 to be consistent with FERC Guideline 3.
- Modified the VSLs for Requirement R2 for clarity and consistency with other standards and VSLs.
- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

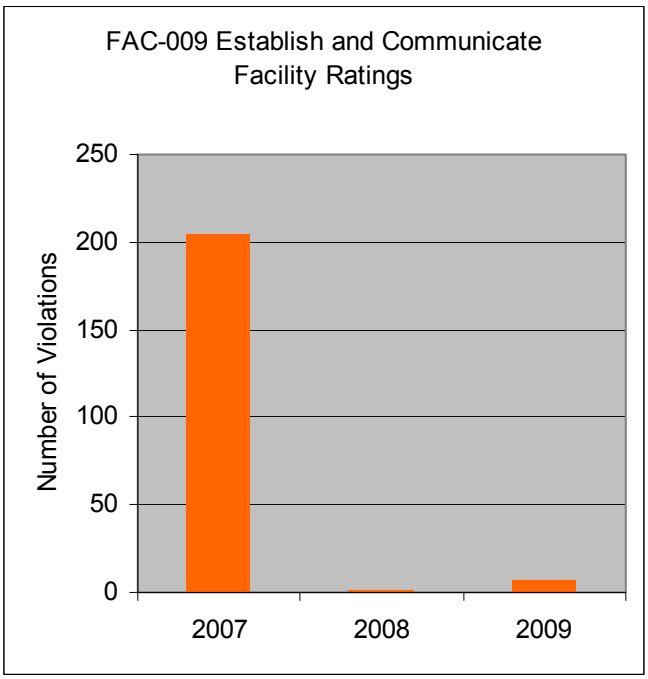
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. The compliance data for this standard is limited With the exception of adding VSLs, the VSLs have not 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 1 Analysis of FAC-009 — Establish and Communicate Facility Ratings

Description of Standard
FAC-009 is intended to ensure that the ratings used to plan and operate the bulk electric system are determined based on an established methodology.

To date, there is only one FERC-approved version of the standard.

Historical Performance
2007, 2008, and 2009 compliance data is charted graphically below based on the number of violations:



There were a significant number of violations in 2007, but far less in 2008 and 2009.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established based on requirements R1 and R2.

Level 1 Violation	Not all requested Facility Ratings associated with existing Facilities were provided to the Reliability Coordinator(s), Planning Authority(ies), Transmission Planner(s), and Transmission Operator(s) in accordance with their respective schedules. (R2)
Level 2 Violation	Not all Facility Ratings associated with new Facilities, modifications to existing Facilities, and re-ratings of existing Facilities were provided to the Reliability Coordinator(s), Planning Authority(ies), Transmission Planner(s), and Transmission Operator(s) in accordance with their respective schedules. (R2)
Level 3 Violation	Facility Ratings provided were not developed consistent with the Facility Ratings Methodology. (R1)
Level 4 Violation	No Facility Ratings were provided to the Reliability Coordinator(s), Planning Authority(ies), Transmission Planner(s), or Transmission Operator(s) in accordance with their respective schedules. (R2)

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into to VSLs for requirements R1and R2.

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R2 to be consistent with FERC Guideline 3.
- Modified the VSLs for requirements R1 and R2 for clarity and consistency with other standards and VSLs.

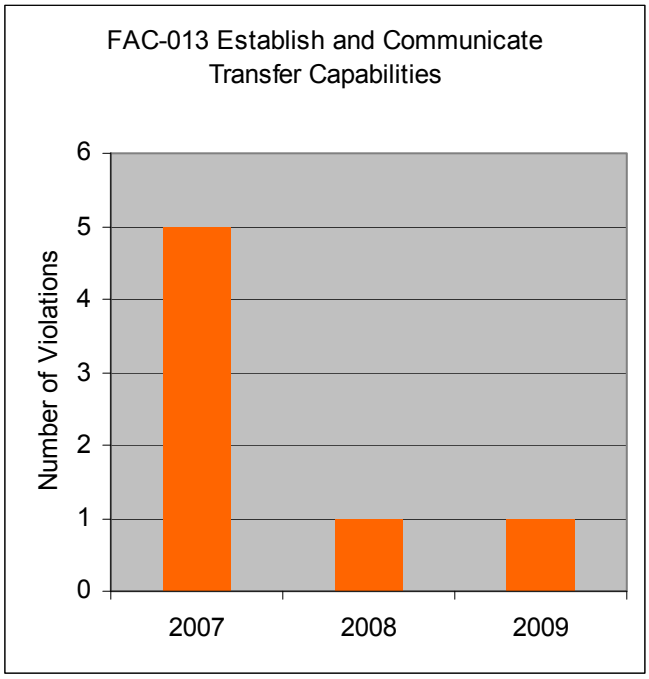
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. The compliance data is limited, while the VSLs have not changed significantly over time. Although proposed 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 1 Analysis of FAC-013 — Establish and Communicate Transfer Capabilities

Description of Standard
FAC-013 is intended to ensure that the ratings used to plan and operate the bulk electric system are determined based on an established methodology.

To date, there is only one FERC-approved version of the standard.

Historical Performance
2007, 2008, and 2009 compliance data is presented graphically below based on the annual number of violations:



There were a limited number of violations in 2007, with one violation in each year of 2008 and 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established based on requirements R1 and R2.

Level 1 Violation	N/A
Level 2 Violation	Not all requested Transfer Capabilities were provided in accordance with their respective schedules. (R2)
Level 3 Violation	Transfer Capabilities were not developed consistent with the Transfer Capability Methodology. (R1)

Level 4 Violation	No requested Transfer Capabilities were provided in accordance with their respective schedules. (R2)

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1and R2.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R2 to be consistent with FERC Guideline 3.
- Modified the VSLs for requirements R1 and R2 for clarity and consistency with other standards and VSLs.

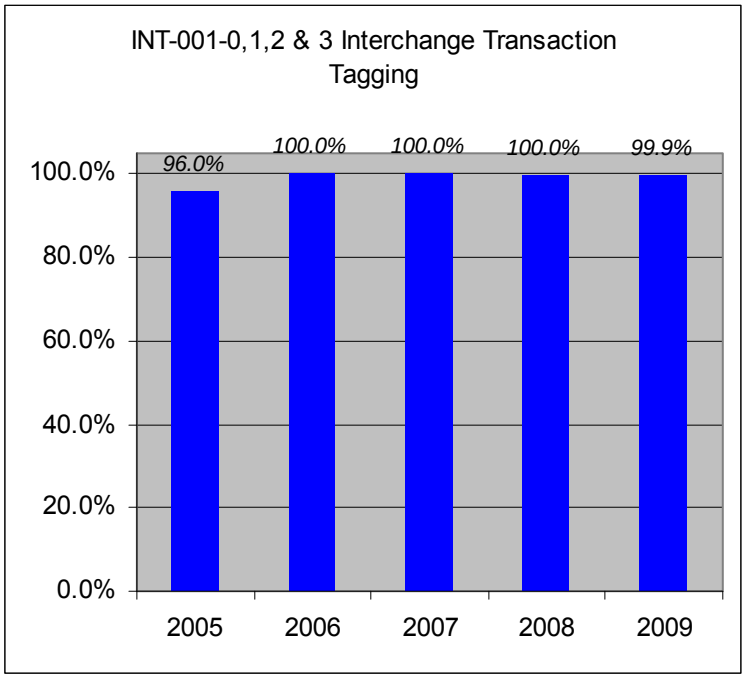
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. The compliance data for this standard is limited, while the VSLs have not changed significantly over 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 1 Analysis of INT-001 — Interchange Transaction Tagging

Description of Standard
INT-001 is intended to ensure that certain transfers between Balancing Authorities are being appropriately recorded as a "Tag."

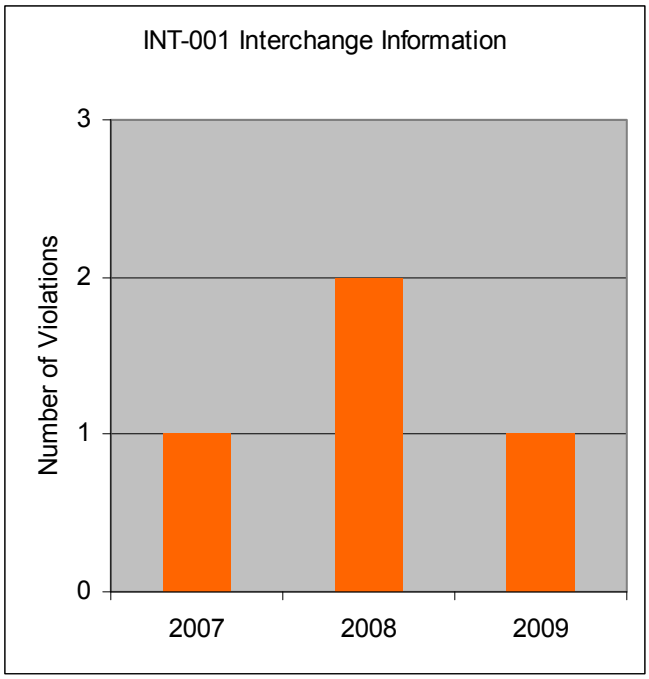
To date, there have been four versions of the standard: INT-001-0, INT-001-1, INT-001-2, and INT-001-3.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is charted below based on the annual percentage of compliant entities.



INT-001 Historical Performance

2007, 2008, and 2009 data is presented graphically below based on the annual number of violations:



There were a limited number of violations.

Past Compliance Criteria
Versions 0 and 1 of this standard did not include Levels of Non-Compliance.

In Version 2 of this standard, Levels of Non-Compliance were established based on the number of times that an entity should have submitted an "Arranged Interchange" (referred to as a "tag" in Version 0).

Level 1 Violation	For Sink Balancing Authorities: One instance of not submitting Arranged interchange to the Interchange Authority as specified in R2.1 and R2.2 For Purchasing Selling Entities that Serve Load: One instance of not submitting Arranged interchange to the Interchange Authority as specified in R1
Level 2 Violation	For Sink Balancing Authorities: Two instances of not submitting Arranged interchange to the Interchange Authority as specified in R2.1 and R2.2 For Purchasing Selling Entities that Serve Load: Two instances of not submitting Arranged interchange to the Interchange Authority as specified in R1
Level 3 Violation	For Sink Balancing Authorities: Three instances of not submitting Arranged interchange to the Interchange Authority as specified in R2.1 and R2.2 For Purchasing Selling Entities that Serve Load:

	Three instances of not submitting Arranged interchange to the Interchange Authority as specified in R1
Level 4 Violation	For Sink Balancing Authorities: Four or more instances of not submitting Arranged interchange to the Interchange Authority as specified in R2.1 and R2.2 For Purchasing Selling Entities that Serve Load: Four or more instances of not submitting Arranged interchange to the Interchange Authority as specified in R1

INT-001-2 Levels of Non-Compliance

Version 3 retained the same Levels of Non-Compliance.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and translated them directly to VSLs for requirements R1 and R2.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- VSLs for components of requirements R1 and R2 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

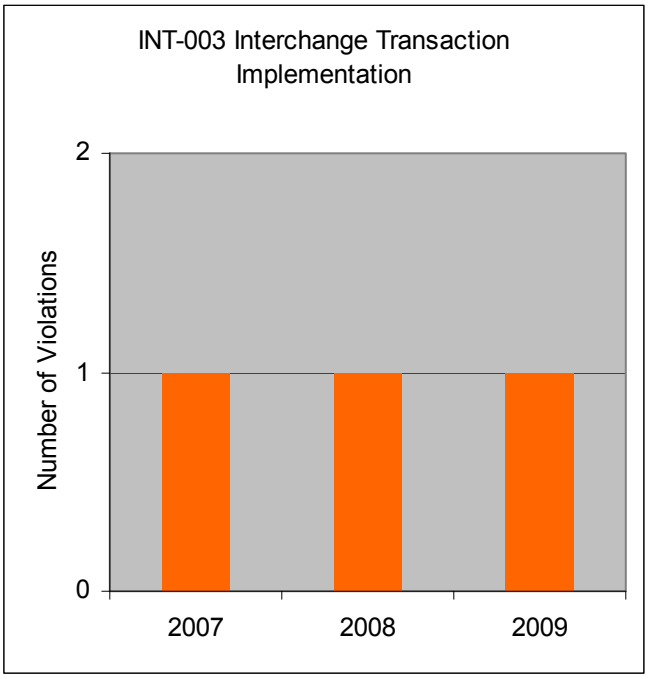
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were equally or more stringent than those defined in the original Levels of Non-Compliance. The proposed VSLs are consistent with those approved by FERC on June 19, 2008. There is limited compliance data for this standard. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of INT-003 — Interchange Transaction Implementation

Description of Standard
INT-003 mandates that Balancing Authorities confirm Interchange Schedules with neighboring Balancing Authorities prior to implementation.

To date, there have been three versions of the standard — INT-003-0, INT-003-1, and INT-003-2.

Historical Performance
For 2007, 2008, and 2009, compliance data is presented graphically below based on the annual number of violations:



There were a limited number of violations.

Past Compliance Criteria
In Version 2 of this standard, Levels of Non-Compliance were established for the requirement and sub-requirements in the standard.

Level 1 Violation	• One instance of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1 and R1.1.2. • One instance of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2
Level 2 Violation	• Two instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1, and R1.1.2. • Two instances of not coordinating the Interchange Schedule with the

	Transmission Operator of the HVDC tie as specified in R1.2
Level 3 Violation	• Three instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1, and R1.1.2. • Three instances of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2
Level 4 Violation	• Four or more instances of entering a schedule into its ACE equation without confirming the schedule as specified in R1, R1.1, R1.1.1, and R1.1.2. • Four or more instances of not coordinating the Interchange Schedule with the Transmission Operator of the HVDC tie as specified in R1.2.

In FERC's June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and translated them directly into VSLs.

Proposed Compliance Criteria Following FERC Guideline Review

- NERC proposes to replace the VSLs for Requirement R1 with VSLs that are consistent with FERC Guideline 4.
- Additionally, VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSLs for the main requirements.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance

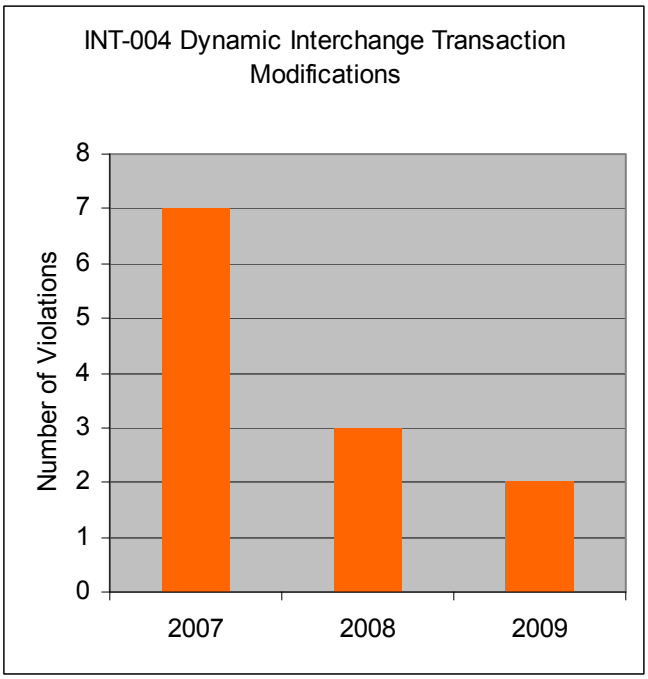
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. There is limited compliance data for this standard, while the VSLs have not changed significantly over time. Although proposed for modification, the VSLs as modified do not signal a lower compliance threshold than previously existed. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of INT-004 — Dynamic Interchange Transaction Modifications

Description of Standard
INT-004 ensures that Dynamic Transfers are properly recorded, such that their reliability impacts can be analyzed and understood.

To date, there have been three versions of the standard — INT-004-0, INT-004-1, and INT-004-2.

Historical Performance
2007, 2008, and 2009 compliance data is presented below based on the annual number of violations:



There were a limited number of violations, with fewer occurring each year.

Past Compliance Criteria
In Version 1 of this standard, Violation Severity Levels were drafted for this standard. In the June 19, 2008 VSL Order, FERC approved those VSLs.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R1 to be consistent with FERC Guideline 3.
- Modified the VSLs for Requirement R2 to be consistent with FERC Guideline 4.
- Modified the VSLs for Requirement R1 for clarity and consistency with other standards and VSLs.

- VSLs for components of Requirement R2 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. There is limited available compliance data for this standard, while 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 1 Analysis of INT-005 — Interchange Authority Distributes Arranged Interchange

Description of Standard
INT-005 is intended to ensure that Arranged Interchange is distributed by the Interchange Authority to all appropriate entities so that they may conduct assessments.

To date, there have been three versions of the standard — INT-005-1, INT-005-2, and INT-005-3.

Historical Performance
2007, 2008, and 2009 compliance data shows no recorded violations of this standard.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for Requirement R1.

Level 1 Violation	One occurrence of not distributing information to all involved reliability entities as described in R1.
Level 2 Violation	Two occurrences of not distributing information to all involved reliability entities as described in R1.
Level 3 Violation	Three occurrences of not distributing information to all involved reliability entities as described in R1.
Level 4 Violation	Four or more occurrences of not distributing information to all involved reliability entities as described in R1 or no evidence provided.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and translated them directly to VSLs for Requirement R1.

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R1 to be consistent with FERC Guidelines 3.
- Modified the VSLs for requirements R1 and R1.1 to be consistent with FERC Guideline 4.

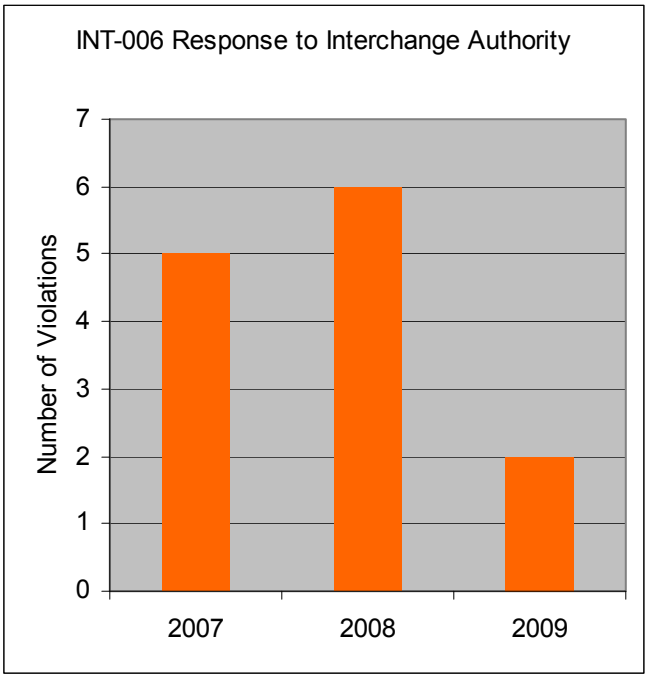
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines. There is limited compliance data for this standard, while the VSLs have not changed significantly over time. Although proposed for modification, 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 1 Analysis of INT-006 — Response to Interchange Authority

Description of Standard
INT-006 ensures that each Arranged Interchange is checked for reliability prior to its implementation.

To date, there have been three versions of the standard — INT-006-1, INT-006-2, and INT-006-3.

Historical Performance
2007, 2008, and 2009 compliance data is presented graphically below based on the number of violations:



There were a limited number of violations.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for Requirement R1.

Level 1 Violation	One occurrence of not responding to the Interchange Authority as described in R1.
Level 2 Violation	Two occurrences of not responding to the Interchange Authority as described in R1.
Level 3 Violation	Three occurrences of not responding to the Interchange Authority as described in R1.
Level 4 Violation	Four or more occurrences of not responding to the Interchange Authority as described in R1 or no evidence provided.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and translated them directly to VSLs for Requirement R1. Additional VSLs were added to address sub-requirements of Requirement R1. Subsequently, on June 24, 2009, FERC approved a set of VSLs in which NERC had applied a consistent approach to assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R1 to be consistent with FERC Guideline 4
- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

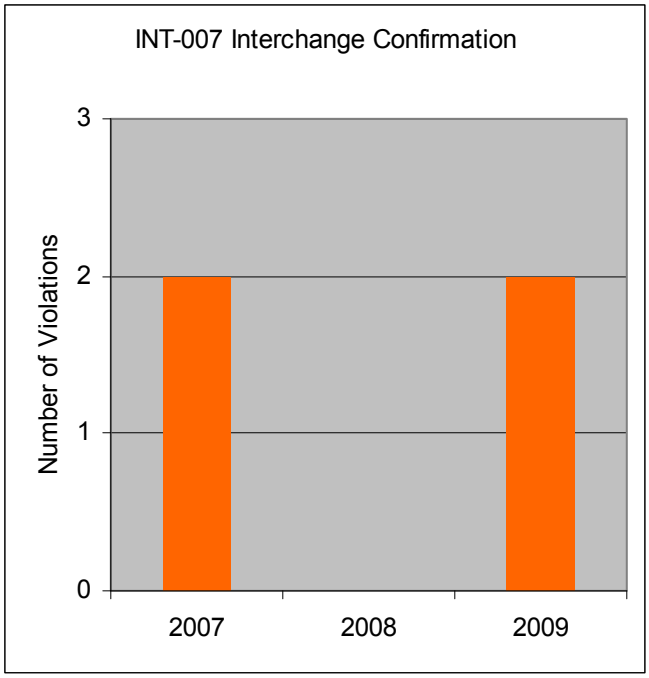
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines. There is limited available compliance data for this standard, while the VSLs have not changed significantly over time. Although proposed 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 1 Analysis of INT-007 — Interchange Confirmation

Description of Standard
INT-007 is intended to ensure that each Arranged Interchange has been checked for reliability before confirmation and implementation as Interchange.

To date, there is only one FERC-approved version of the standard.

Historical Performance
For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There were a limited number of violations during this time.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for Requirement R1.

Level 1 Violation	One occurrence where Interchange-related data was not verified as defined in R1.
Level 2 Violation	Two occurrences where Interchange-related data was not verified as defined in R1.
Level 3 Violation	Three occurrences where Interchange-related data was not verified as defined in R1.
Level 4 Violation	Four or more occurrences where Interchange-related data was not verified as defined in R1.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for Requirement R1. Additional detailed VSLs were added to address sub-requirements which had not previously been included.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Replace the VSLs approved on June 19, 2008 for Requirement R1 with a new set of VSLs that have been modified to be consistent with FERC Guidelines 3 and 4.
- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

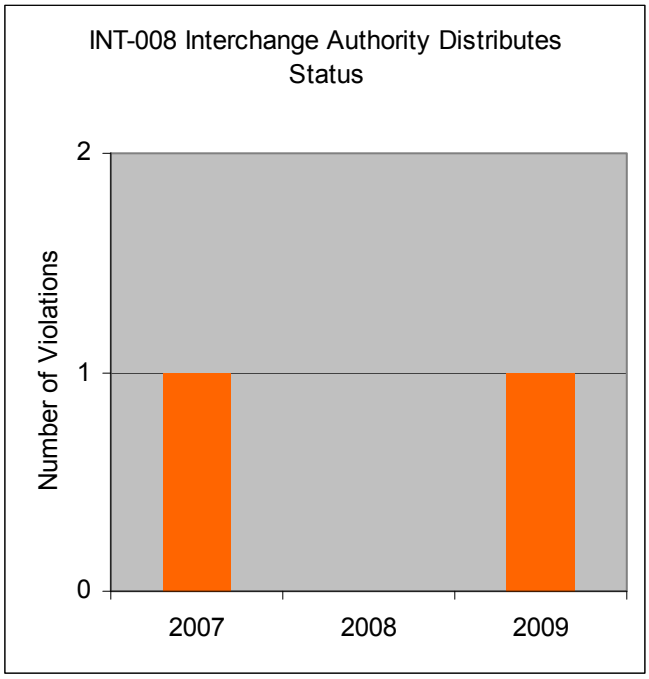
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines. There is limited compliance data for this standard, while the VSLs have not changed significantly over time. Although proposed for modification, 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 1 Analysis of INT-008 — Interchange Authority Distributes Status

Description of Standard
INT-008 ensures that implementation of Interchange between Source and Sink Balancing Authorities is coordinated by an Interchange Authority.

To date, there have been three versions of the standard — INT-008-1, INT-008-2, and INT-008-3.

Historical Performance
2007, 2008, and 2009 compliance data is presented graphically below based on the annual number of violations:



There were a limited number of violations during this time.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for Requirement R1.

Level 1 Violation	One occurrence of not distributing final status and information as described in R1
Level 2 Violation	Two occurrences of not distributing final status and information as described in R1
Level 3 Violation	Three occurrences of not distributing final status and information as described in R1
Level 4 Violation	Four or more occurrences of not distributing final status and information as described in R1or no evidence provided.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for Requirement R1. Additional detailed VSLs were added to address sub-requirements which had not previously been included.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Replace the VSLs approved on June 19, 2008 for requirement R1 with a new set of VSLs that have been modified to be consistent with FERC Guidelines 3 and 4.
- Additionally, VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

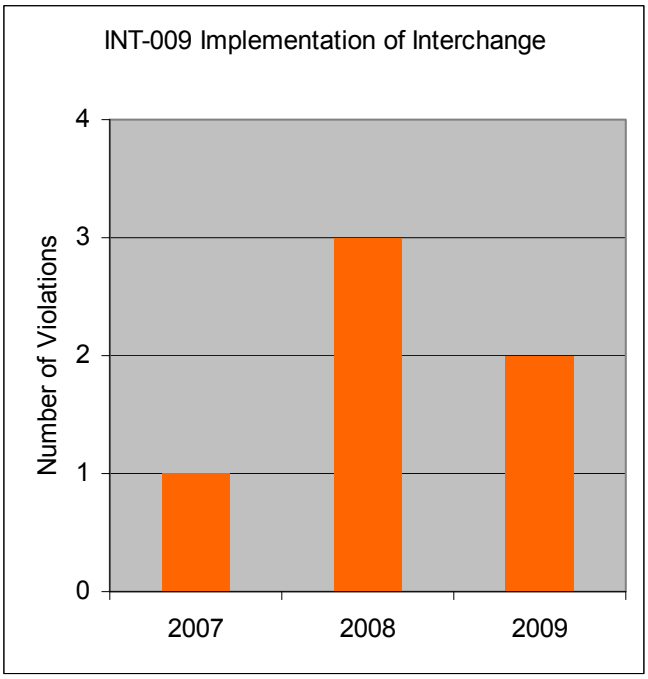
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines. There is limited compliance data for this standard, while the VSLs have not changed significantly over time. Although proposed for modification, 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 1 Analysis of INT-009 — Implementation of Interchange

Description of Standard
INT-009 is intended to ensure that Balancing Authorities implement Interchange exactly as agreed to in the Interchange confirmation process.

To date, there is only one FERC-approved version of the standard.

Historical Performance
2007, 2008, and 2009 compliance data is presented graphically below based on the annual number of violations:



There were a limited number of violations.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for Requirement R1.

Level 1 Violation	One occurrence of not implementing a Confirmed Interchange as described in R1
Level 2 Violation	Two occurrences of not implementing a Confirmed Interchange as described in R1
Level 3 Violation	Three occurrences of not implementing a Confirmed Interchange as described in R1
Level 4 Violation	Four or more occurrences of not implementing a Confirmed Interchange as described in R1or no evidence provided.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and were directly translated into VSLs for Requirement R1.

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to replace the VSLs approved on June 19, 2008 for Requirement R1 with a new set of VSLs that have been modified to be consistent with FERC Guideline 4.

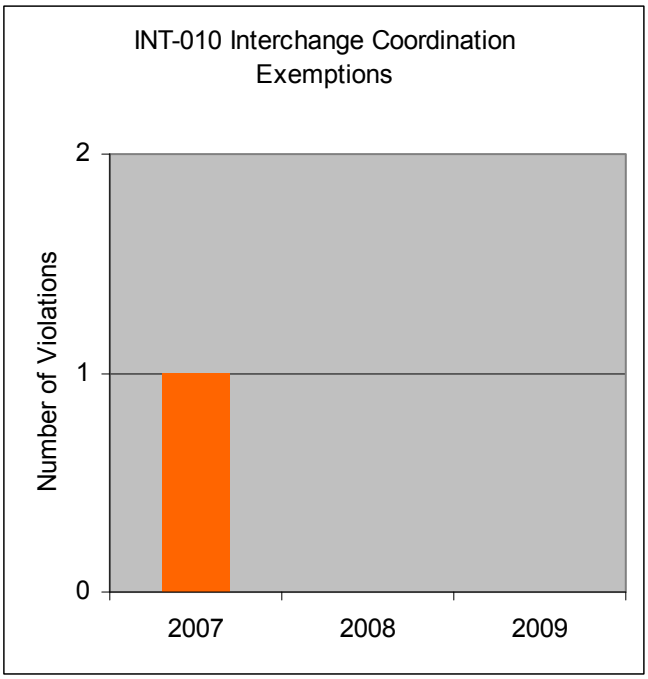
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines. There is limited compliance data for this standard, while the VSLs have not changed significantly over time. Although proposed for modification, 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 1 Analysis of INT-010 — Interchange Coordination Exemptions

Description of Standard
INT-010 allows that during abnormal operating conditions, certain types of Interchange Schedules may be initiated or modified by reliability entities other than those who would normally do so, and exempts them from certain other Interchange standards related to timing during those conditions.

To date, there is only one FERC-approved version of the standard.

Historical Performance
2007, 2008, and 2009 compliance data is presented graphically below based on the annual number of violations:



There were a limited number of violations.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for requirements R1, R2, and R3.

Level 1 Violation	• One occurrence of not submitting an Arranged Interchange as described in R1. • One occurrence of not directing the submittal of a new or modified Arranged Interchange as described in R2 or R3.
Level 2	• Two occurrences of not submitting an Arranged Interchange as described in

Violation	R1. • Two occurrences of not directing the submittal of a new or modified Arranged Interchange as described in R2 or R3.
Level 3 Violation	• Three occurrences of not submitting an Arranged Interchange as described in R1. • Three occurrences of not directing the submittal of a new or modified Arranged Interchange as described in R2 or R3.
Level 4 Violation	• Four or more occurrences of not submitting an Arranged Interchange as described in R1. • Four or more occurrences of not directing the submittal of a new or modified Arranged Interchange as described in Requirements 2 or 3. • No evidence provided.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and translated them directly to VSLs for requirements R1, R2, and R3.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to replace the VSLs approved on June 19, 2008 for requirements R1, R2, and R3 with a new set of VSLs that have been modified to be consistent with FERC Guidelines 2 and 4.

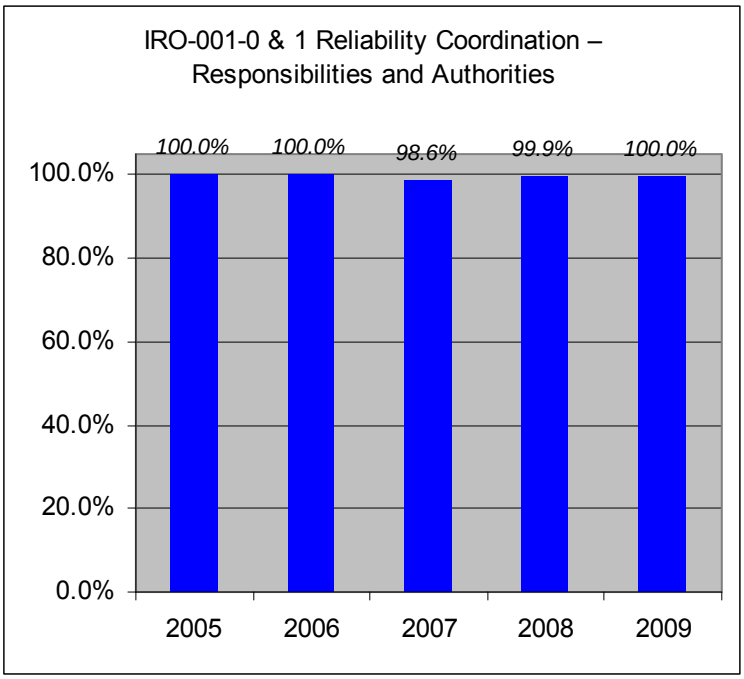
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines. There is limited compliance data for this standard, while the VSLs have not changed significantly over time. Although proposed for modification, 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 1 Analysis of IRO-001 — Reliability Coordination —Responsibilities and Authorities

Description of Standard
IRO-001 is intended to define the various requirements and responsibilities for Reliability Coordinators related to their duties and how they may be utilized or delegated. It also defines the level of deference that other entities must give the Reliability Coordinator.

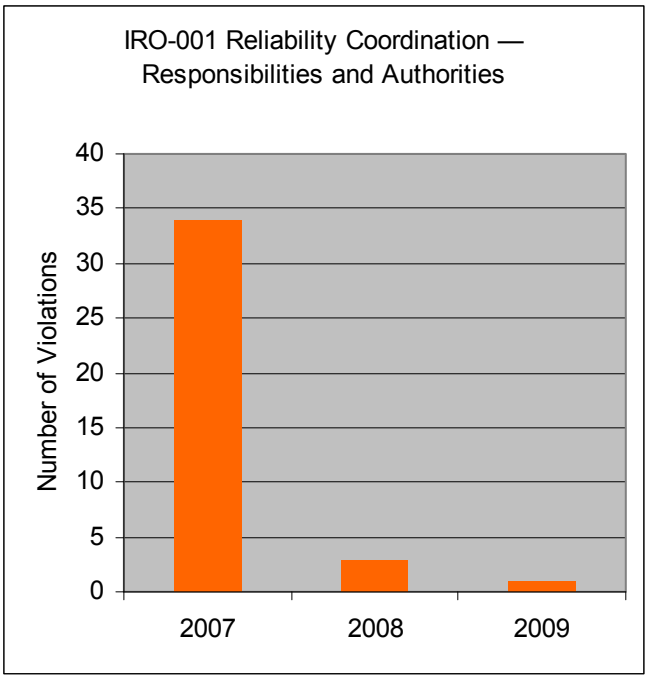
To date, there have been two versions of the standard: IRO-001-0, and IRO-001-1.

Historical Performance
NERC has reviewed compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is presented graphically below based on the annual percentage of compliant entities.



IRO-001 Historical Performance

2007, 2008, and 2009 data is charted below based on the annual number of violations:



There were several violations in 2007, but only a limited number of violations in 2008 and 2009.

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established based on compliance with Requirement R8. No other requirements were addressed in the Levels of Non-Compliance.

Level 1 Violation	N/A
Level 2 Violation	N/A
Level 3 Violation	Reliability Coordinator does not have documentation demonstrating authority to direct all the entities listed in Requirement R8 within its Reliability Coordinator area to take actions to mitigate SOL and IROL violations to return the system to a reliable state.
Level 4 Violation	The Reliability Coordinator does not have the authority to direct all the entities listed in Requirement R8 in its Reliability Coordinator Area to take actions to mitigate SOL and IROL violations to return the system to a reliable state.

IRO-001-0 Levels of Non-Compliance

In Version 1 of this standard, the Levels of Non-Compliance were rewritten to have only Level 4

Level 1 Violation	Not applicable.
Level 2 Violation	Not applicable.

violations apply, but with different criteria for different entities:

Level 3 Violation	Not applicable.
Level 4 Violation	For a Regional Reliability organization: Does not have evidence it established one or more Reliability Coordinators to continuously assess transmission reliability and coordinate emergency operations among the operating entities within the region and across the regional boundaries as described in Requirement 1. For a Reliability Coordinator: There shall be a separate Level 4 non-compliance for every one of the following requirements that is in violation: • Does not have the authority to act as described in R3. • Does not have formal operating agreements with entities that have been delegated any Reliability Coordinator tasks, as specified in R4, Part 1 • Did not confirm that all delegated tasks are understood, communicated, and addressed within its Reliability Coordinator Area and that they are being performed in a manner that complies with NERC and regional standards for the delegated tasks as per R4, Part 2. • Did not verify that delegated tasks are being carried out by NERC Reliability Coordinator certified staff as specified in R6. • Does not have agreements with adjacent Reliability Coordinators that confirm that they will coordinate corrective actions in the event SOL and IROL mitigation actions must be taken (R7). For a Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load Serving Entity, or Purchasing Selling Entity: There shall be a separate Level 4 non-compliance for every one of the following requirements that is in violation: • Did not comply with a Reliability Coordinator directive for reasons other than safety, equipment, or regulatory or statutory requirements. (R8) • Did not inform the Reliability Coordinator immediately after it was determined that it could not follow a Reliability Coordinator directive. (R8)

IRO-001-1 Levels of Non-Compliance

As shown, these updated levels of non-compliance did not include requirements R2, R5, and R9.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and translated them to VSLs for requirements R1, R3, R4, R6, R7, and R8. Additionally, VSLs for requirements R2 and R9 were added to address requirements that were not previously assigned Levels of Non-Compliance.

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Removed "quartiles" from the VSLs and instead used smaller magnitude percentages in determining severity.
- Modifications to VSLs for requirements R2, R4, and R8 to ensure consistency with FERC Guideline 3.
- Replacement of graded VSLs for requirement R2 with binary VSL to remove ambiguity.
- VSLs for requirements R3, R4, R5, R6, R7, and R8 were modified to add clarity and consistency with other standards and VSLs.
- Removed R1 VSLs, as they are not applicable to a user, owner, or operator of the BES.

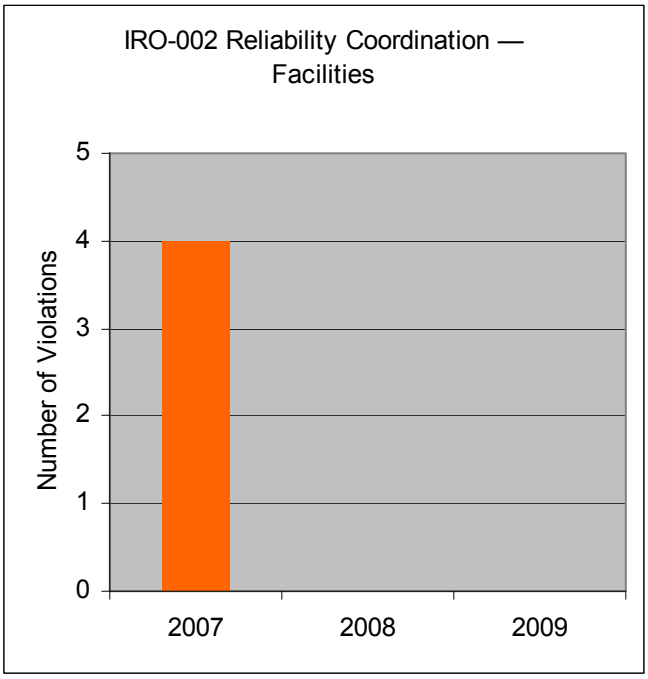
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were equally or more stringent than the original Levels of Non-Compliance, and the VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. Elimination of the quartile approach has resulted in greater stringency for several of the VSLs, as has replacing the graded Requirement R2 VSL with a binary VSL. . NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of IRO-002 — Reliability Coordination - Facilities

Description of Standard
IRO-002 specified certain information, tools, and capabilities that Reliability Coordinators must have in order to perform their responsibilities.

To date, there have been two versions of the standard — IRO-002-0 and IRO-002-1. A third version of the standard, IRO-002-2, has been filed and is pending with FERC. Accordingly, it will not be discussed in this filing.

Historical Performance
For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There were a limited number of violations in 2007, and none during 2008 and 2009.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for requirements R1, R2, R3, R4, R5, R7, R8, and R9.

Level 1 Violation	N/A
Level 2 Violation	• Did not confirm that the network used for data exchange to other Reliability Coordinators is secure as specified in R3.
Level 3 Violation	• Has not requested the data required to support its reliability coordination tasks. (Requirement 2) • Does not control its Reliability Coordinator analysis tools, including the

	exercising of final approvals for planned maintenance (R7) or does not have current procedures in place to mitigate the effects of analysis tool outages as specified in R9.
Level 4 Violation	• Does not have or could not demonstrate the use of voice communication facilities (or show data links) to one or more Transmission Operators, Generator Operators or Balancing Authorities with authority over Bulk Electrical System equipment or with one or more neighboring Reliability Coordinators. (R1 and R4) • Does not have real-time monitoring capability of its Reliability Coordinator Area and surrounding Reliability Coordinator Areas as specified in R5. • Does not have a documented procedure for the use of its backup monitoring facilities. (R8)

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1, R2, R3, R4, R5, R7, R8, and R9; however, not having current procedures in place to mitigate the effects of analysis tool outages as specified in R9 was assigned a Moderate VSL, potentially lowering the threshold of non-compliance. Additionally, a set of VSLs was added to address Requirement R6.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain much of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R1, R2, R3, R4, R5, R7, R8 to be consistent with FERC Guideline 2.
- Modified the VSLs for requirements R1, R2, R3, R5, R6, R7, and R8 to be consistent with FERC Guideline 3.
- Per FERC Guideline 1, modified the VSLs for requirements R9 to be consistent with the Levels of Non-Compliance.
- Modified the VSLs for requirements R1, R3, R4, R5, R6, and R8 for clarity and consistency with other standards and VSLs.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. R9 has been modified to be consistent with the Levels of Non-Compliance, ensuring that compliance thresholds are maintained. 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 1 Analysis of IRO-003 — Wide-Area View

Description of Standard
IRO-003 requires that a Reliability Coordinator must have a wide-area view of its own reliability coordination area, as well as that of neighboring Reliability Coordinators.

To date, there have been three versions of the standard — IRO-003-0, IRO-003-1, and IRO-003-2.

Historical Performance
2007, 2008, and 2009 compliance data indicate no reported violations of this standard.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established based on a combination of requirements R1 and R2.

Level 1 Violation	N/A
Level 2 Violation	N/A
Level 3 Violation	N/A
Level 4 Violation	Did not produce acceptable evidence to confirm that it monitors adjacent Reliability Coordinator Areas as necessary to ensure that, at any time, regardless of prior planned or unplanned events, the Reliability Coordinator is able to determine any potential System Operating Limit and Interconnection Reliability Operating Limit violations within its Reliability Coordinator Area.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1 and R2, but split them into High and Severe categories, potentially lowering the thresholds of non-compliance..

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R1 to be consistent with FERC Guideline 3.
- Per FERC Guideline 1, modified the VSLs for Requirements R1 and R2 to be binary, making them consistent with the Levels of Non-Compliance.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The majority of the VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. By making the R1 and R2 VSLs consistent with the Levels of Non-Compliance, the stringency of the original standard has been preserved. .

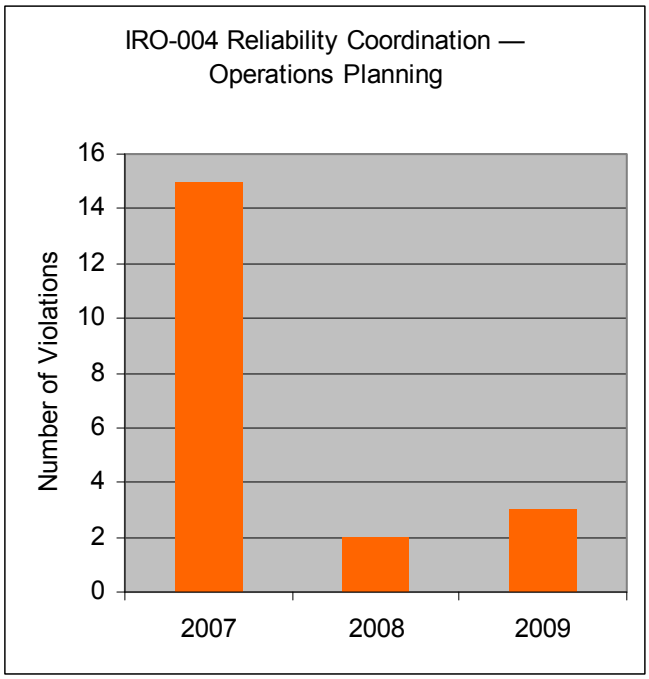
Although proposed for modification, the VSLs as modified do not signal a lower compliance threshold than previously existed. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of IRO-004 — Reliability Coordination — Operations Planning

Description of Standard
IRO-004 defines specific activities that Reliability Coordinators must perform on a next-day basis, including identification of potential operating limits and development of plans to alleviate SOL and IROL exceedances.

To date, there have been two versions of the standard — IRO-004-0, and IRO-004-1.

Historical Performance
2007, 2008, and 2009 compliance data is charted below based on the annual number of violations:



There were a number of violations in 2007, and a significant reduction in the number of violations in 2008 and 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established based largely on the purpose statement in the standard.

Level 1 Violation	System studies were not conducted for one day in a calendar month and/or the action plans were not developed to maintain transmission loading within acceptable limits for potential interface and other IROL violations.
Level 2 Violation	System studies were not conducted for 2–3 days in a calendar month and/or the action plans were not developed to maintain transmission loading within acceptable limits for potential interface and other IROL violations.

Level 3 Violation	System studies were not conducted for 4–5 days in a calendar month and/or the action plans were not developed to maintain transmission loading within acceptable limits for potential interface and other IROL violations.
Level 4 Violation	System studies were not conducted for more than 5 days in a calendar month and/or the action plans were not developed to maintain transmission loading within acceptable limits for potential interface and other IROL violations.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs incorporated the concepts from the preceding Levels of Non-Compliance. In addition, several VSLs were added to cover requirements that were not specifically addressed in the Levels of Non-Compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R6 and R7 to be consistent with FERC Guideline 4.
- Modified the VSLs for Requirement R2 for clarity and consistency with other standards and VSLs.

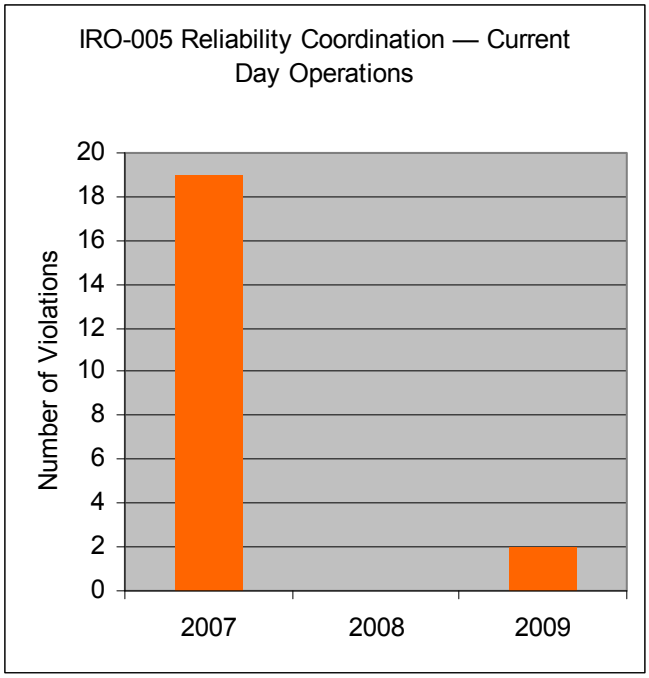
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. The compliance data is limited. Although additional VSL assignments have been developed, the VSLs have not otherwise 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 1 Analysis of IRO-005 — Reliability Coordination — Current Day Operations

Description of Standard
IRO-005 requires that a reliability coordinator monitor Bulk Electric System parameters and include that information in its reliability assessments.

To date, there have been three versions of the standard — IRO-005-0, IRO-005-1, and IRO-005-2. A fourth version of the standard, IRO-005-3, has been filed and is pending with FERC. Accordingly, it will not be discussed in this filing.

Historical Performance
For 2007, 2008, and 2009, compliance data is charted shown below based on the annual number of violations:



There were several violations in 2007, none in 2008, and two in 2009.

Past Compliance Criteria
In Version 2 of this standard, Levels of Non-Compliance were established for requirements R1, R2, R4, R5, R6, R7, R8, R9, R11, R12, R13, R14, and R15.

Level 1 Violation	N/A
Level 2 Violation	Reliability Coordinator • Did not make Interchange Transaction information available to all other Reliability Coordinators in the Interconnection. (Requirement 2)

Level 3 Violation	Reliability Coordinator • Did not communicate to each of its Balancing Authorities and Transmission Operators to make them aware of GMD forecast information or did not assist in the development of any required response plans to a predicted GMD. (Requirement 6) • Did not disseminate information within its Reliability Coordinator Area. (Requirement 7)
Level 4 Violation	Transmission Operator, Balancing Authority, Generator Operator, Load-serving Entity, Purchasing-selling Entity and Transmission Service Provider • Did not operate to the most limiting parameter when a difference in derived limits existed. (R13 Part 2) • Did not respect the SOLs or IROLs in accordance with filed tariffs and regional Total Transfer Calculation and Available Transfer Calculation processes.(Requirement 14 Part 2) Reliability Coordinator • Does not meet one or more of the requirements as specified in requirement 1 (Requirements 1.1 through R1.9) • Did not make Interchange Transaction information available to all other Reliability Coordinators. (Requirement 2) • Did not initiate control actions or emergency procedures to relieve an IROL violation without delay, and no longer than 30 minutes. (Requirement 3 Part 2 and Requirement 5) • Did not direct the Balancing Authorities in the Reliability Coordinator Area to arrange for assistance from neighboring Balancing Authorities. (Requirement 4 Part 2) • Did not monitor the system frequency or each of its Balancing Authorities performance or did not direct rebalancing to return to DCS and CPS compliance. (Requirement 8 Part 1) • Did not coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, IROL, CPS, or DCS violations. (Requirement 9) • When it identified a source of large Area Control Errors, it did not initiate corrective actions with the appropriate Balancing Authority if the problem was inside its Reliability Coordinator Area. (Requirement 11 part 1) • Did not provide evidence that it was aware of the impact of the operation of a Special Protection System on inter-area flows. (Requirement 12) • Did not operate to the most limiting parameter when a difference in derived limits existed. (Requirement 13 Part 2) • Did not provide Transmission Service Providers with SOLs or IROLs (within the Reliability Coordinator's wide-area view) (Requirement 14 Part

	1) • Did not issue alerts when it foresaw a transmission problem (such as an SOL or IROL violation, loss of reactive reserves, etc.) within its Reliability Coordinator Area. (Requirement 15)

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs incorporated the detailed criteria from the Levels of Non Compliance into VSLs for requirements R1, R2, R4, R5, R6, R7, R8, R9, R11, R12, R13, R14, and R15, and additional detail was added to make the criteria more clear. However, the VSLs for R1, R8, and R9 were broken into multiple levels of VSL, which is inconsistent with the way these items were handled in the Levels of Non-Compliance and potentially lowers the threshold of non-compliance. Additional VSLs were added for requirements R3, R10, R16, and R17 to address areas that were not covered in the original Levels of Non-Compliance. Subsequently, on June 24, 2009, FERC approved a set of VSLs in which NERC had applied a consistent approach to assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Per FERC Guideline 1, modified the VSLs for requirements R1, R8, and R9 to be consistent with the Levels of Non-Compliance.
- Modified the VSLs for requirements R8, R9, R12, R13, R14, R15, R16, and R17 for clarity and consistency with other standards and VSLs.
- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The majority of VSLs included in this filing have been modified for clarity and consistency. To ensure the thresholds for compliance are consistent to those in place historically, the VSLs for Requirements R1, R8, and R9 have been modified to be consistent with the levels used prior to June 2008. 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 reducing reliability below historic levels.

Guideline 1 Analysis of IRO-006 — Reliability Coordination — Transmission Loading Relief

Description of Standard
IRO-006 describes the obligations of a Reliability Coordinator to direct Balancing Authorities and Transmission Operators to execute mitigating actions in order to keep the transmission system within operating limits.

To date, there have been five versions of the standard — IRO-006-0, IRO-006-1, IRO-006-2, IRO-006-3, and IRO-006-4.

Historical Performance
2007, 2008, and 2009 compliance data for this standard indicates no reported violations of this standard.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established based on the purpose of the standard.

Level 1 Violation	N/A
Level 2 Violation	N/A
Level 3 Violation	N/A
Level 4 Violation	The Reliability Coordinator did not implement loading relief procedures in accordance with the standard.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs established criteria for each of the requirements in the standard. On July 21, 2008, NERC filed changes to these VSLs based on directives from FERC.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R1 to incorporate the sub-requirements into the Main Requirement VSL so that compliance is based on the number of missing sub-requirements.
- Modified the VSLs for requirements R4 and R5 to be consistent with FERC Guideline 2.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with NERC and FERC Guidelines. Compliance data for this standard is limited, and the VSLs have not changed

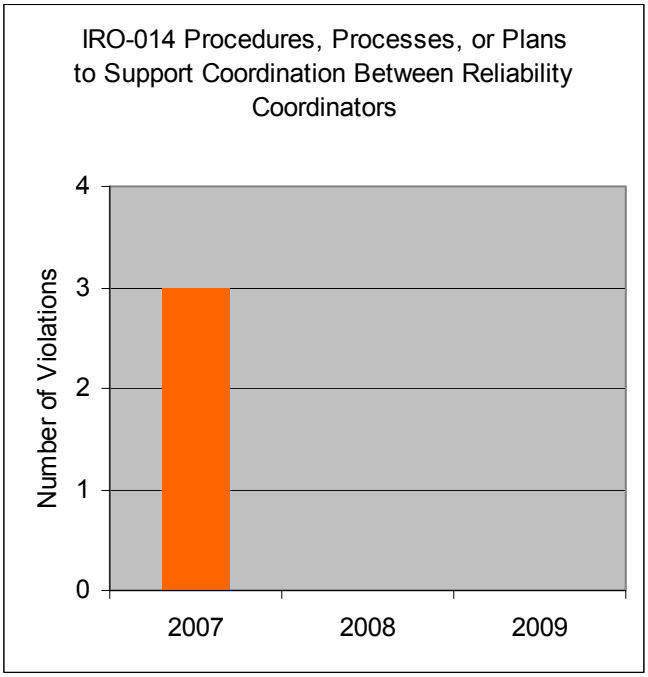
significantly over time. Although proposed for modification, the VSLs as modified do not signal a lower compliance threshold than previously existed. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of IRO-014 — Procedures, Processes, or Plans to Support Coordination between Reliability Coordinators

Description of Standard
IRO-014 places obligations on Reliability Coordinators to ensure that they maintain coordination with other Reliability Coordinators to ensure the overall reliability of the interconnected transmission system.

To date, there has only been one version of the standard.

Historical Performance
For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There were a limited number of violations during this time, with none occurring in 2008 and 2009.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for requirements R1, R2.2, R3, and R4.

Level 1 Violation	• The latest versions of Operating Procedures, Processes, or Plans (identified through self-certification) that require notification, exchange of information, or coordination of actions with one or more other Reliability Coordinators to support Interconnection reliability do not include a version control number or date, and a distribution list. (R4) • The latest versions of Reliability Coordinator internal documents developed

	to support action(s) required as a result of other Reliability Coordinators do not include both a reference to the source Operating Procedure, Process, or Plan and the agreed upon actions from the source Operating Procedure, Process, or Plan. (R3)
Level 2 Violation	• Documents required by this standard were not distributed to all entities on the distribution list. (R2.2) • Documents required by this standard were not available for System Operators' Realtime use. • Documents required by this standard do not address all required topics. (R1.1)
Level 3 Violation	• Documents required by this standard do not address any of the six required topics in Reliability Standard IRO-014 R1.
Level 4 Violation	N/A

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1, R2, R3, and R4. Additional details were added to address components that were not previously assigned Levels of Non-Compliance. Subsequently, on June 24, 2009, FERC approved a set of VSLs in which NERC had applied a consistent approach to assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes:

- Modified the VSLs for requirements R1.1, R2, and R3 clarity and consistency with other standards and VSLs.
- VSLs for components of requirements R1.1, R2, R3, and R4 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.
- The VSLs for Requirement R4 were changed from binary VSLs to gradated VSLs.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. 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 1 Analysis of IRO-015 — Notifications and Information Exchange between Reliability Coordinators

Description of Standard
IRO-015 places obligations on Reliability Coordinators to ensure that they maintain coordination with other Reliability Coordinators to ensure the overall reliability of the interconnected transmission system.

To date, there is only one version of the standard.

Historical Performance
2007, 2008, and 2009 compliance data indicate there have been no reported violations of this standard.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for requirements R1, R2, and R3.

Level 1 Violation	Did not participate in agreed upon (at least weekly) conference calls and other communication forums with adjacent Reliability Coordinators. (R2)
Level 2 Violation	Did not notify other Reliability Coordinators as specified in its Operating Procedures, Processes, or Plans for making notifications but no Adverse Reliability Impacts resulted from the incident. (R1)
Level 3 Violation	Did not provide requested reliability-related information to other Reliability Coordinators. (R3)
Level 4 Violation	Did not notify other Reliability Coordinators as specified in its Operating Procedures, Processes, or Plans for making notifications and Adverse Reliability Impacts resulted from the incident. (R1)

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retain the criteria used in the Level of Non-Compliance criteria and incorporate them into VSLs for requirements R1, R2, and R3. Subsequently, on June 24, 2009, FERC approved a set of VSLs in which NERC had applied a consistent approach to assigning binary VSLs as "Severe."

Proposed Compliance Criteria
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R1 and R2 for clarity and consistency with other standards and VSLs.
- VSLs for components of requirements R1 and R2 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
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 1 Analysis of IRO-016 — Coordination of Real-Time Activities between Reliability Coordinators

Description of Standard
IRO-016 places obligations on Reliability Coordinators to ensure that they maintain coordination with other Reliability Coordinators to ensure the overall reliability of the interconnected transmission system.

To date, there is only one version of the standard.

Historical Performance
2007, 2008, and 2009 compliance data show no violations of this standard.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established based on requirement R1.

Level 1 Violation	For potential, actual or expected events which required Reliability Coordinator-to-Reliability Coordinator coordination, the Reliability Coordinator did coordinate, but did not have evidence that it coordinated with other Reliability Coordinators.
Level 2 Violation	N/A
Level 3 Violation	N/A
Level 4 Violation	For potential, actual or expected events which required Reliability Coordinator-to-Reliability Coordinator coordination, the Reliability Coordinator did not coordinate with other Reliability Coordinators.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs replace the criteria used in the Level of Non-Compliance with VSLs for requirements R1 and R2. Subsequently, on June 24, 2009, FERC approved a set of VSLs in which NERC had applied a consistent approach to assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.
- Modified the VSLs for Requirement R2 for clarity and consistency with other standards and VSLs.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for clarity and consistency. The VSLs have not changed significantly over time. Although proposed for modification, the VSLs as modified

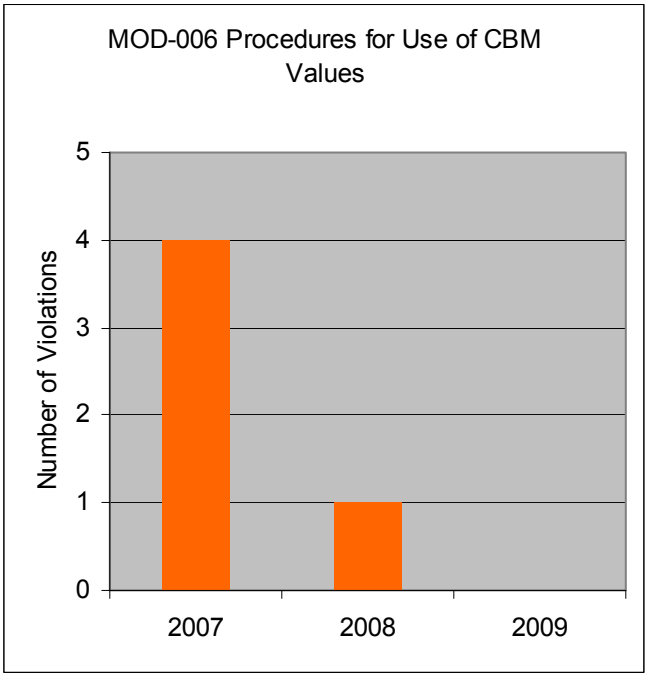
do not signal a lower compliance threshold than previously existed. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of MOD-006 — Procedures for Use of CBM Values

Description of Standard
MOD-006 is intended to promote the consistent and uniform use of transmission Transfer Capability Margin calculations among transmission system users.

To date, there is only one FERC-approved version of the standard.

Historical Performance
2007, 2008, and 2009 compliance data is charted below based on the annual number of violations:



There were a limited number of violations during this time, with the all except one occurring in 2007.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R1 and R2.

Level 1 Violation	The Transmission Service Provider's procedure for use of CBM is available and addresses only two of the three requirements for such documentation as listed above under Reliability Standard MOD-006-0_R1.
Level 2 Violation	N/A
Level 3 Violation	N/A

Level 4 Violation	The Transmission Service Provider's procedure for use of CBM addresses one or none of the three requirements as listed above under Reliability Standard MOD-006-0_R1, or is not available.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1 and R2.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R1 for clarity and consistency with other standards and VSLs.
- Modified the VSLs for Requirement R2 to be consistent with FERC Guideline 3.
- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

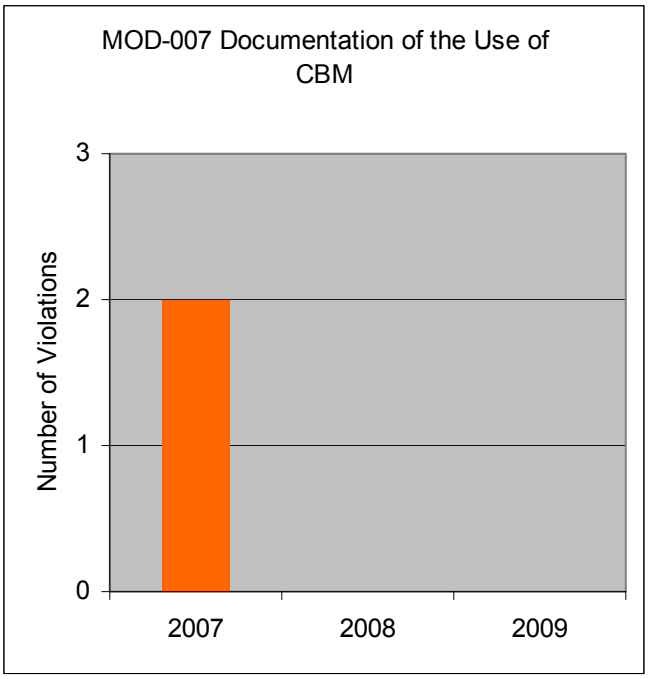
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. There is limited compliance data for this standard and the VSLs have not changed significantly over time. 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 1 Analysis of MOD-007 — Documentation of the Use of CBM

Description of Standard
MOD-007 is intended to promote the consistent and uniform application of Transfer Capability Margin calculations among transmission system users by developing methodologies for calculating Capacity Benefit Margin (CBM).

To date, there is only one FERC-approved version of the standard.

Historical Performance
For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There were a limited number of violations during this time, with only two occurring in 2007 and none in the subsequent years.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R1 and R2.

Level 1 Violation	N/A
Level 2 Violation	Information pertaining to the use of CBM during an Energy Emergency was provided, but was not made available on a web site accessible by the Regional Reliability Organizations, NERC, and transmission users, or meets only two of the three requirements as listed in Reliability Standard MOD-007-0_R2.
Level 3	N/A

Violation	
Level 4 Violation	After the use of CBM (excluding Non-Firm Transmission Sales), information pertaining to the use of CBM was provided but meets one or none of the three requirements as listed above under Reliability Standard MOD-007-0_R2, or no information was provided

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1, and R2.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R1 and R2 to be consistent with FERC Guideline 3
- VSLs for components of Requirement R2 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirement.

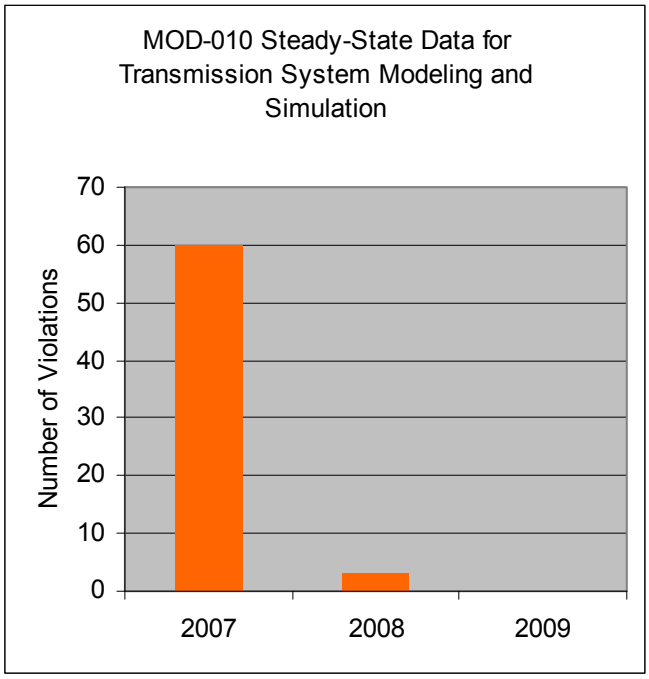
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and to utilize NERC's approach for incorporating VSLs from sub-requirements into those of the main requirement. There is limited compliance data for this standard and 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 1 Analysis of MOD-010 — Steady State Data for Transmission System Modeling and Simulation

Description of Standard
MOD-010 is intended to establish consistent data requirements, reporting procedures, and system models to be used in the analysis of the reliability of the Interconnected Transmission Systems.

To date, there is only one FERC-approved version of the standard.

Historical Performance
2007, 2008, and 2009 compliance data is charted below based on the annual number of violations:



There were several violations in 2007, much less in 2008, and none in 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R1 and R2.

Level 1 Violation	Steady-state data was provided, but was incomplete in one of the seven areas identified in Reliability Standard MOD-011-0_R1.
Level 2 Violation	N/A
Level 3 Violation	Steady-state data was provided, but was incomplete in two or more of the seven areas identified in Reliability Standard MOD-011-0_R1
Level 4	Steady-state data was not provided.

Violation	

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1 and R2; however, the VSLs were split based on quartile percentages, potentially lowering the thresholds of non-compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Per FERC Guideline 1, modified the VSLs for Requirements R1 and R2 to be consistent with the Levels of Non-Compliance.
- Modified the VSLs for Requirement R2 to be consistent with FERC Guideline 3.

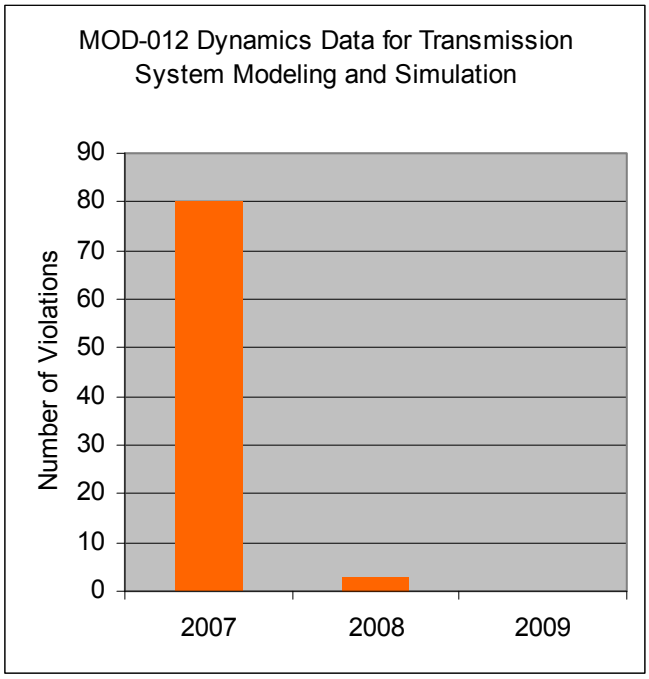
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified to be consistent with the Levels of Non-Compliance. There is limited compliance data for this standard and the VSLs have not changed significantly over time. Although proposed 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 1 Analysis of MOD-012 — Dynamics Data for Transmission System Modeling and Simulation

Description of Standard
MOD-012 is intended to establish consistent data requirements, reporting procedures, and system models to be used in the analysis of the reliability of the interconnected transmission systems.

To date, there is only one FERC-approved version of the standard.

Historical Performance
2007, 2008, and 2009 compliance data is charted below based on the annual number of violations:



There were several violations in 2007, much less in 2008, and none in 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R1 and R2.

Level 1 Violation	Dynamics data was provided, but was incomplete in one of the four areas identified in Reliability Standard MOD-013-0_R1.
Level 2 Violation	N/A
Level 3 Violation	Dynamics data was provided, but was incomplete in two or more of the four areas identified in Reliability Standard MOD-013-0_R1.
Level 4	Dynamics data was not provided.

Violation	

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Levels of Non-Compliance and incorporated them into VSLs for requirements R1 and R2; however, the VSLs were split based on quartile percentages, potentially lowering the thresholds of non-compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Per FERC Guideline 1, modified the VSLs for requirements R1 and R2 to be consistent with the Levels of Non-Compliance.
- Modified the VSLs for Requirement R2 to be consistent with FERC Guideline 3.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified to be consistent with the Levels of Non-Compliance, and the proposed modifications 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 1 Analysis of MOD-016 — Documentation of Data Reporting Requirements for Actual and Forecast Demands

Description of Standard
MOD-016 is intended to ensure that accurate, actual and forecast Demand data is available to perform future system assessments to identify the need for system reinforcements for continued reliability, as well as to assist in proper real-time operation of controllable Demand-Side Management (DSM) resources.

To date, there have been two versions of the standard — MOD-016-0 and MOD-016-1.

Historical Performance
2007, 2008, and 2009 compliance data indicates there have been no reported violations of this standard.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R1, R2, and R3.

Level 1 Violation	Identified the scope and details of demand, Net Energy for Load, and controllable DSM data to be reported and the reporting procedures but did not specify that consistent data is to be supplied for Reliability Standards TPL-005-0, TPL-006-0, MOD-010-0, MOD-011-0, MOD-012-0, MOD-013-0, MOD-014-0, MOD-015-0, MOD-016, MOD-017-0, MOD-018-0, MOD-019-0, MOD-020-0, and MOD-021-0.
Level 2 Violation	N/A
Level 3 Violation	N/A
Level 4 Violation	Did not identify the scope and details of demand, Net Energy for Load, and controllable DSM data to be reported and the reporting procedures.

In Version 1 of this standard, the Levels of Non-Compliance were replaced as shown below.

Level 1 Violation	Documentation does not address completeness and double counting of customer data.
Level 2 Violation	Documentation did not address one of the three types of data required in R1 (Demand data, Net Energy for Load data, and controllable DSM data).
Level 3 Violation	No evidence documentation was distributed as required.
Level 4 Violation	Either the documentation did not address two of the three types of data required in R1 (Demand data, Net Energy for Load data, and controllable DSM data) or there was no documentation.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into to VSLs for requirements R1, R2, and R3.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R1, R1.1, and R3 to be consistent with FERC Guidelines 2 and 3.
- Modified the VSLs for Requirement R3 for clarity and consistency with other standards and VSLs.
- Removed R2 VSLs, as they are not applicable to a user, owner, or operator of the BES.
- VSLs for components of requirement R3 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

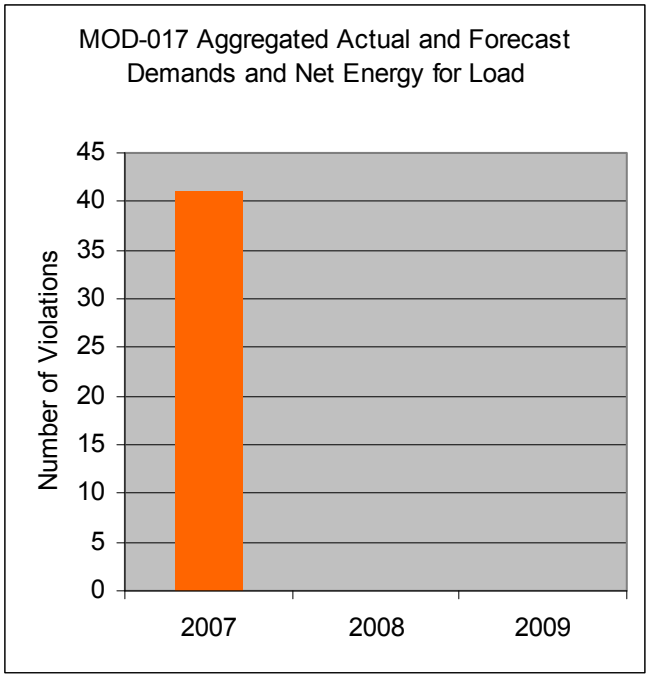
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency with NERC's approach for incorporating VSLs from sub-requirements into those of the main requirement. There is limited compliance data for this standard and 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 1 Analysis of MOD-017 — Aggregated Actual and Forecast Demands and Net Energy for Load

Description of Standard
MOD-017 is intended to ensure that accurate, actual and forecast Demand data is available to perform future system assessments to identify the need for system reinforcements for continued reliability, as well as to assist in proper real-time operation of controllable Demand-Side Management (DSM) resources.

To date, there is only one FERC-approved version of the standard.

Historical Performance
For 2007, 2008, and 2009, compliance data is charted below based on the annual number of violations:



There were several violations in 2007, and none in 2008 and 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for Requirement R1.

Level 1 Violation	Did not provide actual and forecast demands and Net Energy for Load data in one of the four areas as required in Reliability Standard MOD-017-0_R1.
Level 2 Violation	Did not provide actual and forecast demands and Net Energy for Load data in two of the four areas as required in Reliability Standard MOD-017-0_R1.
Level 3 Violation	Did not provide actual and forecast demands and Net Energy for Load data in three of the four areas as required in Reliability Standard MOD-017-0_R1.

Level 4 Violation	Did not provide actual and forecast demands and Net Energy for Load data in any of the areas as required in Reliability Standard MOD-017-0_R1.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and translated them to VSLs for R1. Subsequently, on June 24, 2009; FERC approved a set of VSLs assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs as previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R1 for clarity and consistency with other standards and VSLs.
- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirement.

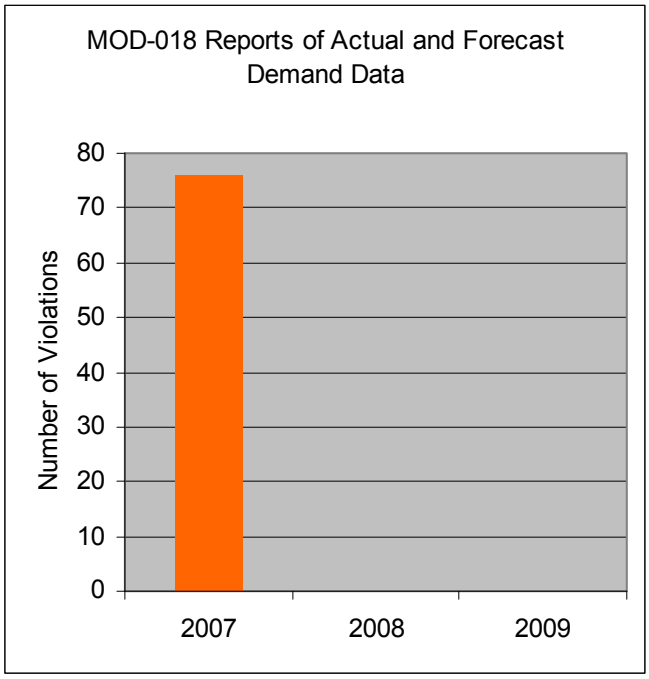
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for clarity and consistency. After allowing for the transition to mandatory compliance, there is limited available compliance data for this standard and the VSLs have not 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 1 Analysis of MOD-018 — Reports of Actual and Forecast Demand Data

MOD-018 is intended to ensure that accurate, actual and forecast Demand data is available to perform future system assessments to identify the need for system reinforcements for continued reliability, as well as to assist in proper real-time operation of controllable Demand-Side Management (DSM) resources.

To date, there is only one FERC-approved version of the standard.

Historical Performance
2007, 2008, and 2009 compliance data is charted below based on the annual number of violations:



There were several violations in 2007, and none in 2008 or 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for Requirement R1.

Level 1 Violation	Information for Reliability Standard MOD-018-0 item R1.1 or R1.2 was not provided.
Level 2 Violation	Information for Reliability Standards MOD-018-0 items R1.1 and R1.2 was not provided.
Level 3 Violation	N/A
Level 4 Violation	N/A

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance and incorporated them in VSLs for Requirement R1. Additional VSLs were developed to address requirements R1.3 and R2. Subsequently, on June 24, 2009, FERC approved a set of VSLs assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R1 and R2 for clarity and consistency with other standards and VSLs.
- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.
- Modified the VSLs for Requirement R2 to be consistent with FERC Guideline 3.

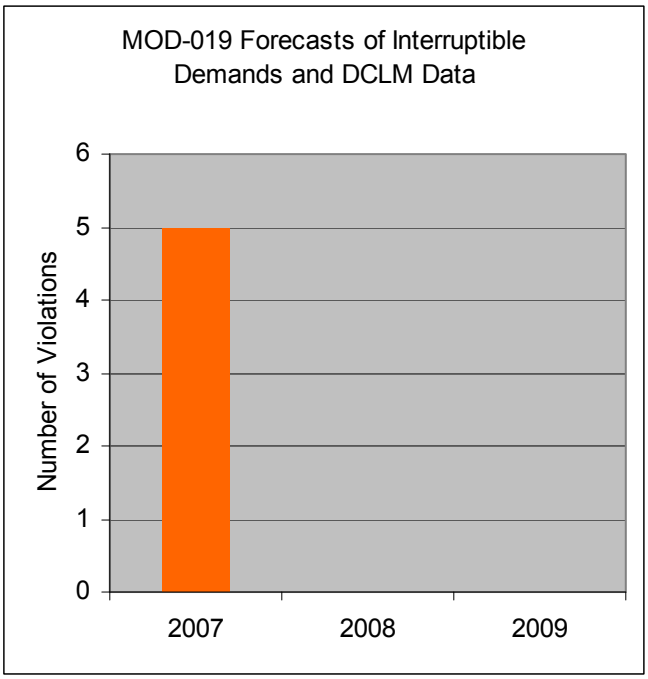
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guideline 3 and for clarity and consistency. After allowing for the transition to mandatory compliance, there is limited compliance data for this standard and 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 1 Analysis of MOD-019 — Forecasts of Interruptible Demands and DCLM Data

Description of Standard
MOD-019 is intended to ensure that accurate, actual and forecast Demand data is available to perform future system assessments to identify the need for system reinforcements for continued reliability, as well as to assist in proper real-time operation of controllable Demand-Side Management (DSM) resources.

To date, there is only one FERC-approved version of the standard.

Historical Performance
E
For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There were a limited number of violations in 2007, and none in 2008 and 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for Requirement R1.

Level 1 Violation	N/A
Level 2 Violation	N/A
Level 3 Violation	N/A
Level 4	Did not provide forecasts of interruptible Demands and DCLM data as required in

Violation	Standard MOD-019-0_R1.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for Requirement R1; however, the VSLs were split into quartile percentages, potentially lowering the thresholds of non-compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to replace the VSLs previously approved with a set that is more aligned with the details of the requirements, as required by FERC Guideline 3. Additionally, per FERC Guideline 1, the quartile percentages have been removed to make the VSLs consistent with the levels of Non-Compliance.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines 1 and 3. These 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.

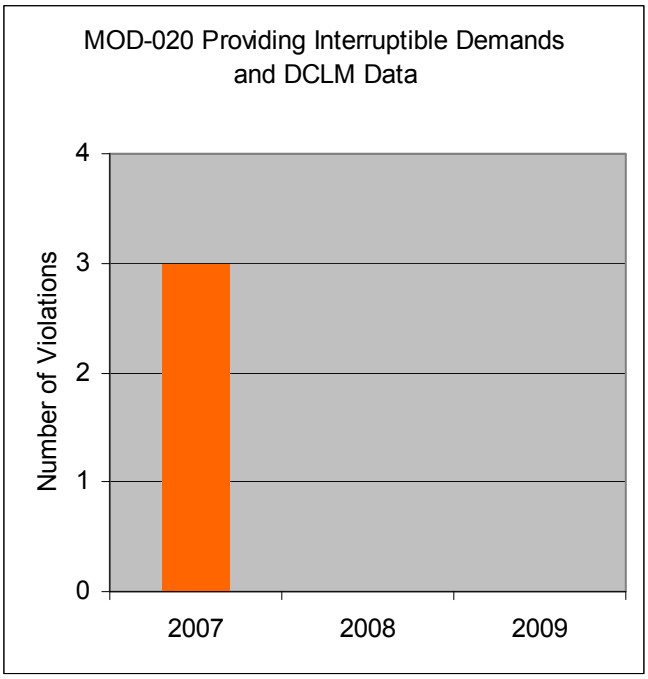
Guideline 1 Analysis of MOD-020 — Providing Interruptible Demands and DCLM Data

Description of Standard
MOD-020 is intended to ensure that ensure that assessments and validation of past events and databases can be performed using Demand data; that accurate, actual and forecast Demand data is available to perform future system assessments to identify the need for system reinforcements for continued reliability; and to assist in proper real-time operation of controllable Demand-Side Management (DSM) resources.

To date, there is only one FERC-approved version of the standard.

Historical Performance

For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There were a limited number of violations in 2007, and none in 2008 and 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for Requirement R1:

Level 1 Violation	Interruptible Demands and DCLM data were provided to Reliability Coordinators, Balancing Authorities, and Transmission Operators, but were incomplete.
Level 2 Violation	N/A

Level 3 Violation	N/A
Level 4 Violation	Interruptible Demands and DCLM data were not provided to Reliability Coordinators, Balancing Authorities, and Transmission Operators.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs replace the Levels of Non-Compliance with VSLs that focus on the timely provision of data.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLS for Requirement R1 to be consistent with FERC Guideline 3.
- Modified the VSLs for Requirement R1 for clarity and consistency with other standards and VSLs.

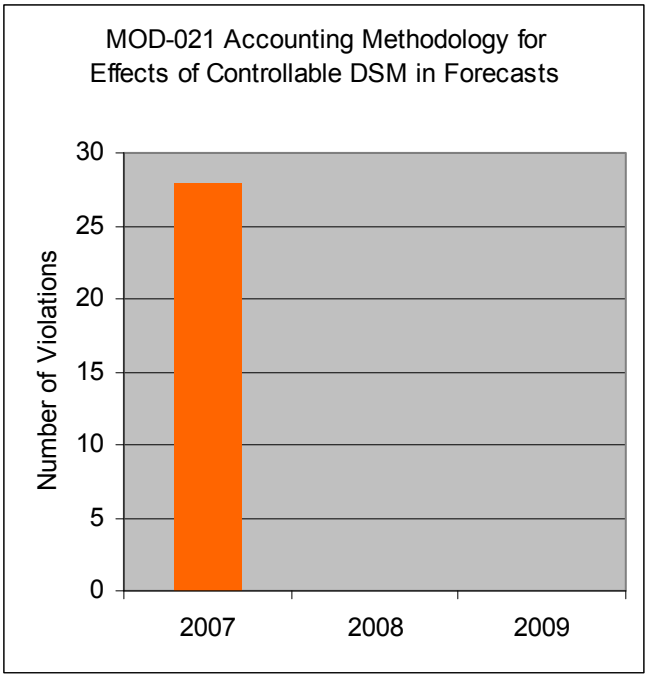
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guideline 3 and for clarity and consistency. There is limited compliance data for this standard and the VSLs have not changed significantly over 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 1 Analysis of MOD-021 — Accounting Methodology for Effects of Controllable DSM in Forecasts

Description of Standard
MOD-021 is intended to ensure that ensure that assessments and validation of past events and databases can be performed using Demand data; that accurate, actual and forecast Demand data is available to perform future system assessments to identify the need for system reinforcements for continued reliability; and to assist in proper real-time operation of controllable Demand-Side Management (DSM) resources.

To date, there is only one FERC-approved version of the standard.

Historical Performance
For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There were several violations in 2007, and none in 2008 and 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R1 and R3.

Level 1 Violation	Documentation on the treatment of DSM programs in the demand and energy forecasts was provided, but was incomplete.
Level 2 Violation	N/A

Level 3 Violation	N/A
Level 4 Violation	Documentation on the treatment of DSM programs in the demand and energy forecasts was not provided.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Levels of Non-Compliance and incorporated them into VSLs for requirements R1 and R3. Additional detail was added, as well as VSLs, for Requirement R2.

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R1, R2, and R3 for clarity and consistency with other standards and VSLs.
- Modified the VSLs for Requirement R3 to be consistent with FERC Guideline 3.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guideline 3 and for clarity and consistency. After allowing for the transition to mandatory compliance, there is limited compliance data available for this standard. 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 1 Analysis of NUC-001 — Nuclear Plant Interface Coordination

Description of Standard
NUC-001 requires coordination between Nuclear Plant Generator Operators and Transmission Entities for the purpose of ensuring nuclear plant safe operation and shutdown.

This analysis is focused on Standards and VSLs approved through late 2009, including NUC-001-1. Another version of the standard, NUC-001-2 was approved in early 2010, but, based on timing, is not considered in this report.

Historical Performance
This standard has not yet taken effect.

Past Compliance Criteria
In Version 1 of this standard, Violation Severity Levels were established for requirements R1, R2, R3, R4, R5, R6, R7, R8, and R9. These VSLs had not yet been reformatted to use the tables currently in effect; as such, their appearance was more like Levels of Non-Compliance.

Lower	Agreement(s) exist per this standard and NPIRs were identified and implemented, but documentation described in M1-M8 was not provided.
Moderate	Agreement(s) exist per R2 and NPIRs were identified and implemented, but one or more elements of the Agreement in R9 were not met.
High	One or more requirements of R3 through R8 were not met.
Severe	No proposed NPIRs were submitted per R1, no Agreement exists per this standard, or the Agreements were not implemented.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the original VSLs for this standard. Those VSLs retained the criteria used in the original VSL criteria and incorporated them into new VSLs, formatted in the current tabular style. Additional detail was added to the VSLs to ensure all elements of the requirements were considered.

Proposed Compliance Criteria Following FERC Guideline Review
In this filing, NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R1, R2, R3, R4, R5, R6, R7, and R8 to be consistent with FERC Guideline 3.
- Modified the VSLS for requirements R5 and R6 to be consistent with FERC Guideline 2.

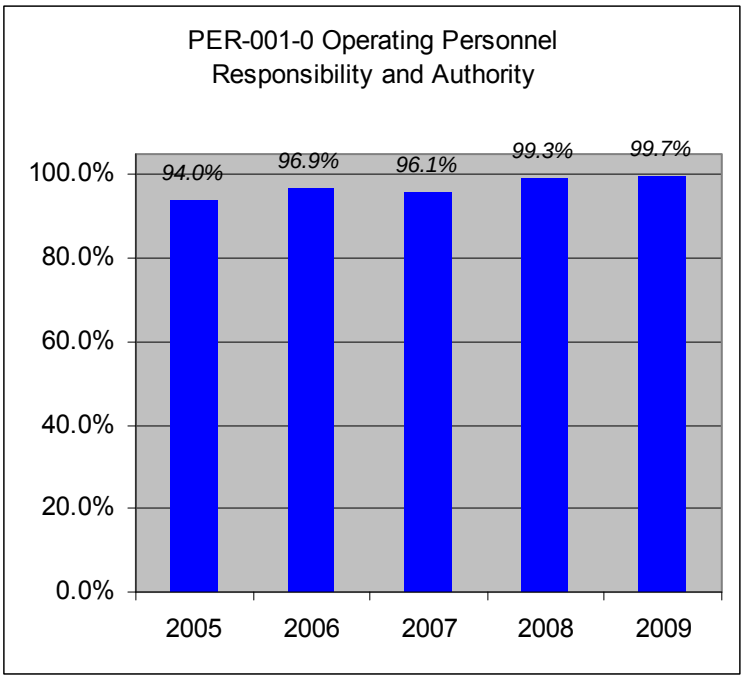
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines 2 and 3. Although proposed for modification, the VSLs as modified do not signal a lower compliance threshold than any threshold that previously existed.

Guideline 1 Analysis of PER-001 — Operating Personnel Responsibility and Authority

Description of Standard
PER-001 establishes the requirements and responsibilities of Transmission Operators and Balancing Authorities with regard to real-time actions.

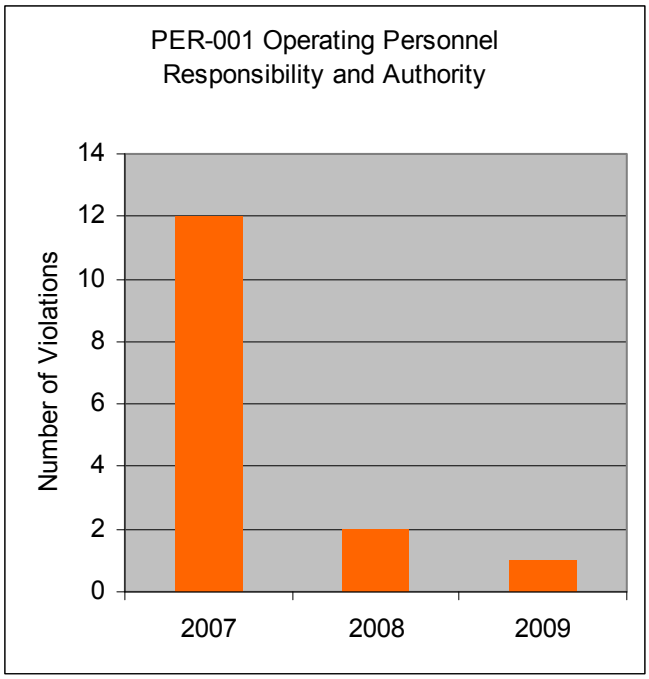
To date, there is only one FERC approved version of the standard.

Historical Performance
NERC has reviewed compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is charted below based on the annual percentage of compliant entities.



PER-001 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically below based on the annual number of violations:



There were a limited number of violations in 2007, with much less in 2008 and 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established based on the number of elements listed in the measure but missing from the entity's documentation.

Level 1 Violation	The Transmission Operator or Balancing Authority has written documentation that includes three of the four items in M1.
Level 2 Violation	The Transmission Operator or Balancing Authority has written documentation that includes two of the four items in M1.
Level 3 Violation	The Transmission Operator or Balancing Authority has written documentation that includes one of the four items in M1.
Level 4 Violation	The Transmission Operator or Balancing Authority has written documentation that includes none of the four items in M1, or the personnel interviews indicate Transmission operator or balancing authority do not have the required authority.

EOP-001-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs replace the Level of Non-Compliance and no longer refer to the associated measure.

Proposed Compliance Criteria Following FERC Guideline Review
No changes to this set of VSLs, other than minor grammar and formatting corrections, are proposed.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance

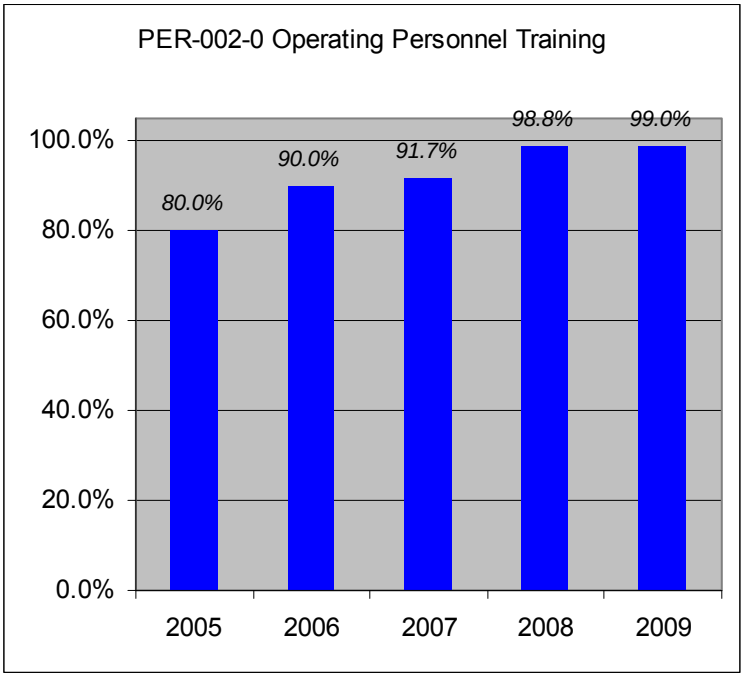
The VSLs approved by FERC in the June 19, 2008 Order did not use the associated measure to define the expectations of the requirement as did the original Levels of Non-Compliance. While using the measures as the bases would seem to apply more stringency than the approved VSLs, measures are not in themselves requirements and cannot establish compliance expectations of the requirements. 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 1 Analysis of PER-002 — Operating Personnel Training

Description of Standard
PER-002 establishes the obligation of Transmission Operators and Balancing Authorities to provide their personnel with adequate training.

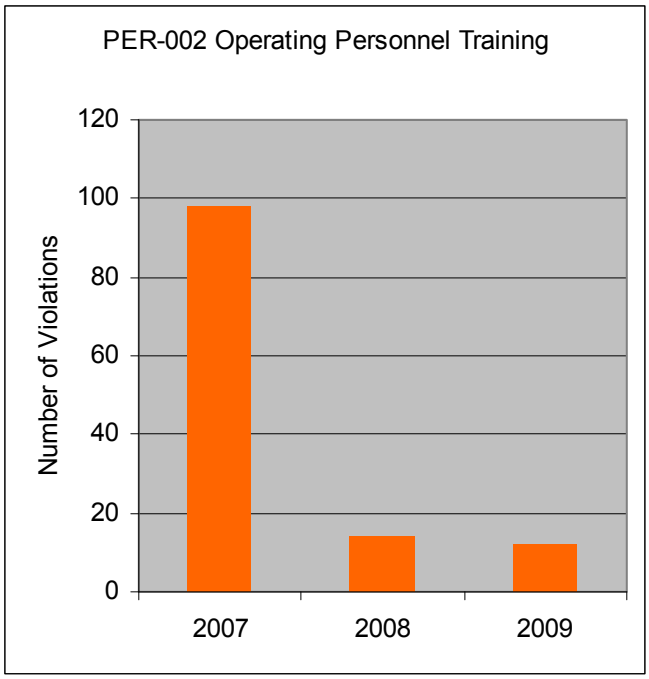
To date, there is only one FERC-approved version of the standard, although NERC proposed to retire it if and when newly filed PER-005-1 is approved by FERC.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is charted below based on the annual percentage of compliant entities.



PER-002 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically below based on the annual number of violations:



There were a significant number of violations in 2007, with significantly less occurring in 2008 and 2009.

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established based on compliance with requirements R3 and R4. Requirements R1 and R2 were not included in the Levels of Non-Compliance.

Level 1 Violation	N/A
Level 2 Violation	The Transmission Operator or Balancing Authority operating personnel training program does not address all elements of Requirement R3.
Level 3 Violation	The Transmission Operator or Balancing Authority operating personnel training program does not address Requirement R4.
Level 4 Violation	A Transmission Operator or Balancing Authority has not provided a training program for its operating personnel.

PER-002-1 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and translated them to VSLs for requirements R3 and R4. Several additional VSLs were added to support Requirement R3. Quartile VSLs were added to address any violations of requirements R1 and R2.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes:

- Modified the VSLs for requirements R1, R2, and R4 for clarity and consistency with other standards and VSLs.
- Modified the VSLs for Requirement R3 to be consistent with FERC Guideline 3.
- VSLs for components of requirements R2 and R3 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

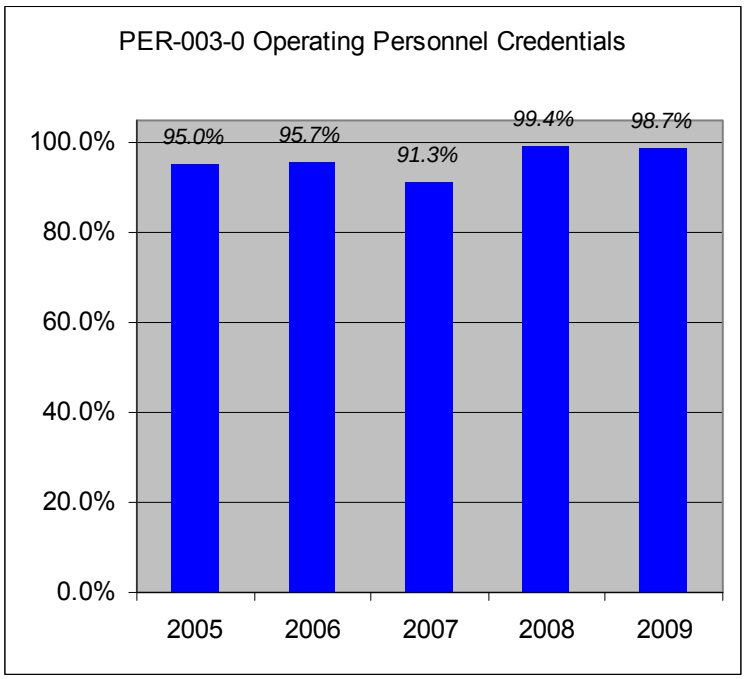
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were equally or more stringent than the levels defined in the original Levels of Non-Compliance. . Although proposed for modification, the VSLs as modified do not signal a lower compliance threshold than previously existed. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of PER-003 — Operating Personnel Credentials

Description of Standard
PER-003 requires that certain personnel working for Transmission Operators, Balancing Authorities, or Reliability Coordinators must be NERC-certified.

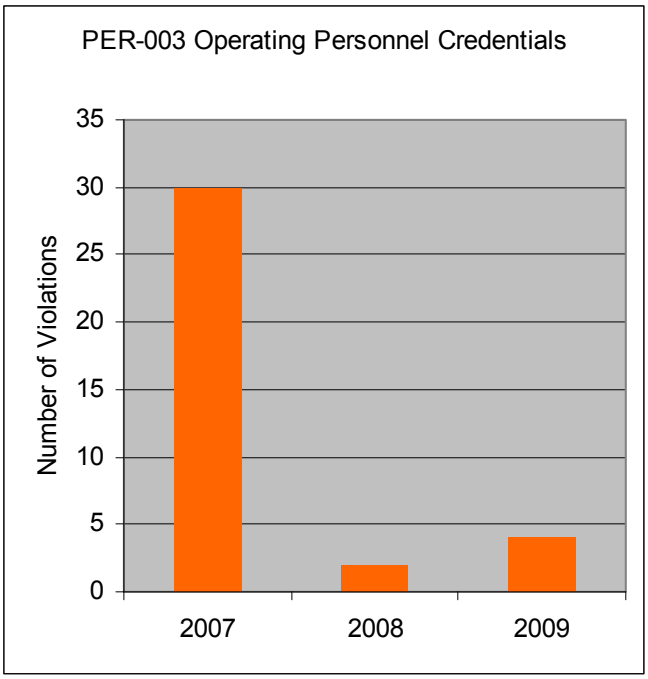
To date, there is only one FERC-approved version of the standard.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is charted below based on the annual percentage of compliant entities.



PER-003 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically below based on the annual number of violations:



There were several violations in 2007, and a small number of violations in 2008 and 2009.

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established based on the number of hours not staffed correctly. A violation occurred if at any time the entity was not staffed as required, with the most severe penalty occurring if more than 72 hours in a calendar month were not staffed as required.

Level 1 Violation	The Transmission Operator, Balancing Authority, or Reliability Coordinator did not meet the requirement for a total time greater than 0 hours and up to 12 hours during one calendar month period for each required position in the staffing plan.
Level 2 Violation	The Transmission Operator, Balancing Authority, or Reliability Coordinator did not meet the requirement for a total time greater than 12 hours and up to 36 hours during one calendar month period for each required position in the staffing plan.
Level 3 Violation	The Transmission Operator, Balancing Authority, or Reliability Coordinator did not meet the requirement for a total time greater than 36 hours and up to 72 hours during one calendar month period for each required position in the staffing plan.
Level 4 Violation	The Transmission Operator, Balancing Authority, or Reliability Coordinator did not meet the requirement for a total time greater than 72 hours during one calendar month period for each required position in the staffing plan.

PER-003-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and translated them directly to VSLs for requirements R1, R1.1, and R1.2.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Replaced the graded VSL used in the previous Requirement R1 VSLs with a binary VSL.
- Modified the VSLs for Requirement R1 to be consistent with FERC Guideline 1.
- Modified the VSLs for Requirement R1 for clarity and consistency with other standards and VSLs.
- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirement.

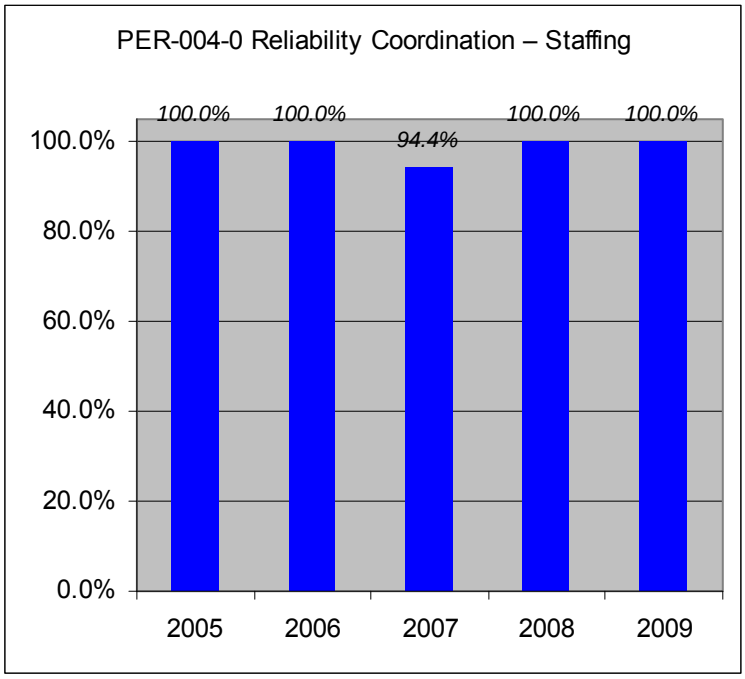
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were equivalent to those defined in the original Levels of Non-Compliance. Replacing those VSLs with a single binary VSL is a more stringent approach to compliance. Although 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 1 Analysis of PER-004 — Reliability Coordination - Staffing

Description of Standard
PER-004 defines specific criteria for personnel that perform key functions related to Reliability Coordinator duties.

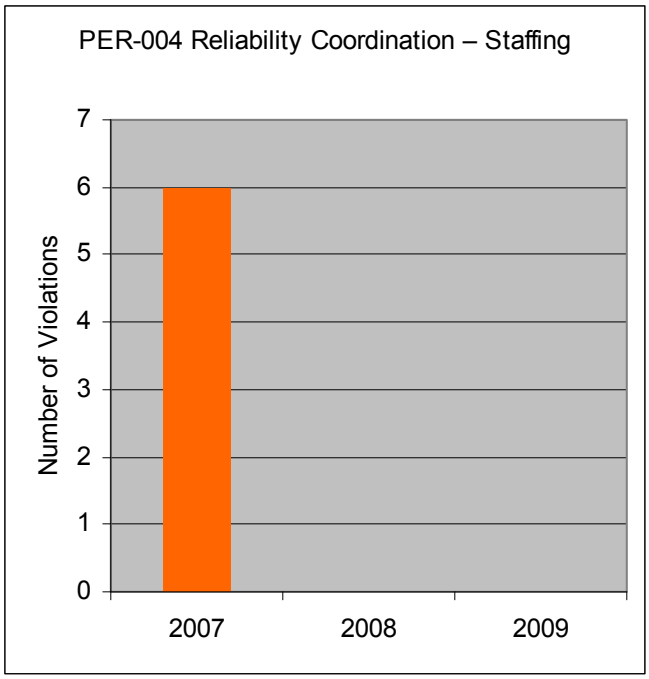
To date, there have been two versions of the standard: PER-004-0, and PER-004-1. PER-004-2 has been filed and is pending with FERC. Accordingly, it will not be addressed here.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is charted below based on the annual percentage of compliant entities.



PER-004 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically below based on the annual number of violations:



There were six violations in 2007, and none in 2008 and 2009.

Past Compliance Criteria

In Version 1 of this standard, Levels of Non-Compliance were established based on compliance with requirements R2, R3, and R4. For each requirement that was violated, a Level 4 violation would be assigned. Requirements R1 and R5 were not included in the Levels of Non-Compliance.

Level 1 Violation	Not applicable.
Level 2 Violation	Not applicable.
Level 3 Violation	Not applicable.
Level 4 Violation	There shall be a separate Level 4 non-compliance for every one of the following requirements that is in violation: • One or more of its shift personnel did not complete a minimum of five days per year of training and drill sing realistic simulations of system emergencies in the past year (R2) • No evidence operating personnel have a comprehensive understanding of the Reliability Coordinator Area and interactions with neighboring Reliability Coordinator areas (R3) • No evidence operating personnel have an extensive understanding of the Balancing Authorities, Transmission Operators, and generation operators within the Reliability Coordination Area (R4)

PER-004-1 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and translated them directly to requirements R2, R3, and R4, using graded approach based on numbers of days of training provided for Requirement R2 and a quartile approach for requirements R3 and R4. Additionally, a binary VSL was added to address any violations of Requirement R1, and a quartile VSL was added to address any violations of Requirement R5.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified VSLs for requirements R2, R3, R4, and R5 to be consistent with FERC Guideline 3.
- Modified VSLs for requirements R2, R3, R4, and R5 for clarity and consistency with other standards and VSLs.
- Added a "Severe" VSL for Requirement R5 related to having protocols in place for information exchange.

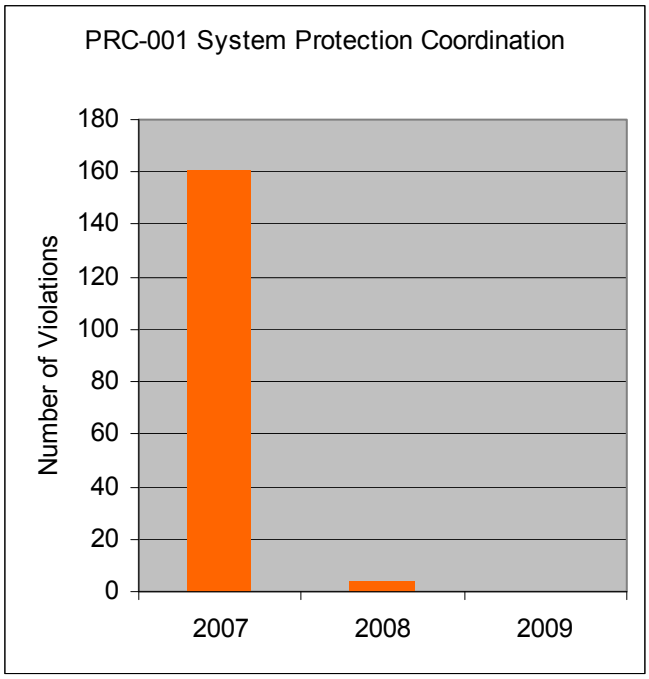
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were equally or more stringent than those defined in the original Levels of Non-Compliance, and the VSLs within this filing are consistent with those VSLs. Although proposed 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 1 Analysis of PRC-001 — System protection Coordination

Description of Standard
PRC-001 is intended to ensure system protection is coordinated among operating entities.

To date, there have been two versions of the standards — PRC-001-0, and PRC-001-1.

Historical Performance
2007, 2008, and 2009 compliance data is charted below based on the annual number of violations:



There were a significant number of violations in 2007, a small number in 2008, and none in 2009.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for requirements R3 and R6.

Level 1 Violation	N/A.
Level 2 Violation	N/A
Level 3 Violation	N/A
Level 4	Generator Operators

Violation	• Failed to provide evidence of coordination when installing new protective systems and all protective system changes with its Transmission Operator and Host Balancing Authority as specified in R3.1. Transmission Operators • Failed to provide evidence of coordination when installing new protective systems and all protective system changes with neighboring Transmission Operators and Balancing Authorities as specified in R3.2. • Did not monitor the status of each Special Protection System, or did not notify affected Transmission Operators, Balancing Authorities of changes in special protection status as specified in R6. Balancing Authorities • Did not monitor the status of each Special Protection System, or did not notify affected Transmission Operators, Balancing Authorities of changes in special protection status as specified in R6.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them in to VSLs for requirements R3 and R6. Additionally, VSLs were added to address requirements R1, R2, R4, R5, and R6 that were not previously assigned Levels of Non-Compliance. Subsequently, on June 24, 2009, FERC approved a set of VSLs assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R1, R2, and R6 to be consistent with FERC Guideline 3.
- Modified the VSLs for requirements R4 and R5 for clarity and consistency with other standards and VSLs.
- VSLs for components of requirements R2 and R5 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

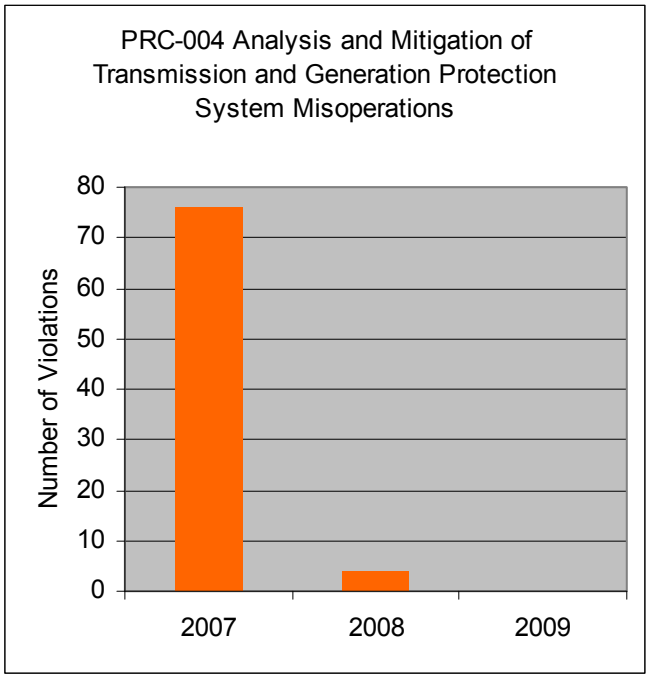
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. The compliance data for this standard is limited, and with the exception of adding VSLs to requirements not previously assigned a Level of Non-Compliance, 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 1 Analysis of PRC-004 — Analysis and Mitigation of Transmission and Generation Protection System Misoperations

Description of Standard
PRC-004 is intended to ensure all transmission and generation Protection System Misoperations affecting the reliability of the Bulk Electric System (BES) are analyzed and mitigated.

To date, there have been two versions of the standard — PRC-004-0, and PRC-004-1.

Historical Performance
For 2007, 2008, and 2009, compliance data is charted below based on the annual number of violations:



There were several violations in 2007, a small number for 2008, and none in 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R1, R2, and R3.

Level 1 Violation	Documentation of transmission protection system misoperations is complete according to Reliability Standard PRC-003-0_R1, but documentation of corrective actions taken for all identified misoperations is incomplete.
Level 2 Violation	Documentation of corrective actions taken for misoperations is complete, but documentation of transmission protection system misoperations is incomplete according to Reliability Standard PRC-003-0_R1.
Level 3	Documentation of misoperations and corrective actions is incomplete.

Violation	
Level 4 Violation	No documentation of misoperations or corrective actions was provided.

In Version 1 of this standard, the Levels of Non-Compliance were expanded with additional detail.

Level 1 Violation	Transmission Owners and Distribution Providers that own a Transmission Protection System • Documentation of Misoperations is complete according to PRC-004 R1, but documentation of Corrective Action Plans is incomplete. Generator Owners • Documentation of Misoperations is complete according to PRC-004 R2, but documentation of Corrective Action Plans is incomplete.
Level 2 Violation	Transmission Owners and Distribution Providers that own a Transmission Protection System • Documentation of Misoperations is incomplete according to PRC-004 R1 and documentation of Corrective Action Plans is incomplete. Generator Owners • Documentation of Misoperations is incomplete according to PRC-004 R2 and documentation of Corrective Action Plans is incomplete.
Level 3 Violation	Transmission Owners and Distribution Providers that own a Transmission Protection System • Documentation of Misoperations is incomplete according to PRC-004 R1 and there are no associated Corrective Action Plans. Generator Owners • Documentation of Misoperations is incomplete according to PRC-004 R2 and there are no associated Corrective Action Plans.
Level 4 Violation	Transmission Owners and Distribution Providers that own a Transmission Protection System • Misoperations have not been analyzed and documentation has not been provided to the Regional Reliability Organization according to Requirement 3. Generator Owners • Misoperations have not been analyzed and documentation has not been provided to the Regional Reliability Organization according to R3.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them in VSLs for requirements R1, R2, and R3. Additional detail was added for clarity.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R1 and R2 to be consistent with FERC Guideline 3
- Modified the VSLs for requirements R1 and R2 to be consistent with FERC Guideline 4.

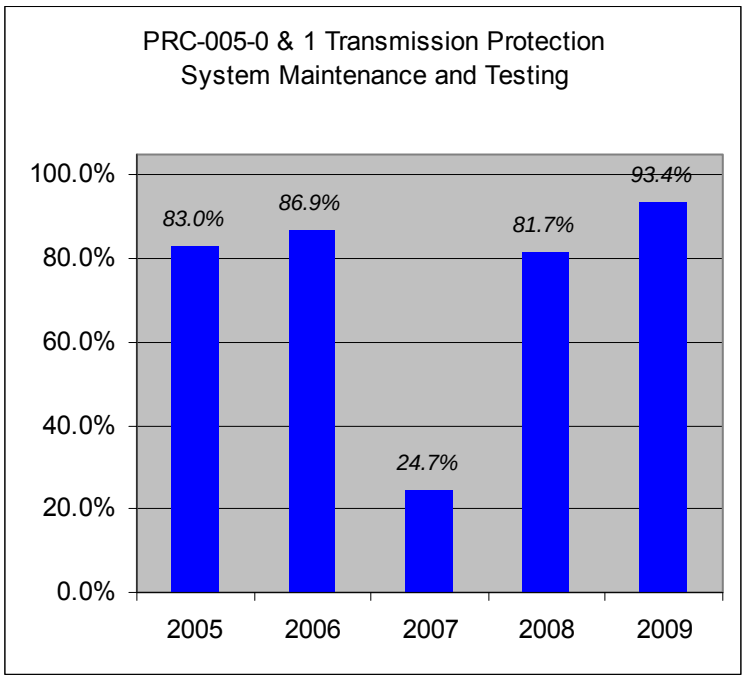
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines. The compliance data is limited, while the VSLs have not changed significantly over time. Although proposed for modification, the VSLs 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 1 Analysis of PRC-005 — Transmission Protection System Maintenance

Description of Standard
PRC-005 requires the analysis of protection system misoperations as well as the establishment of maintenance and testing programs.

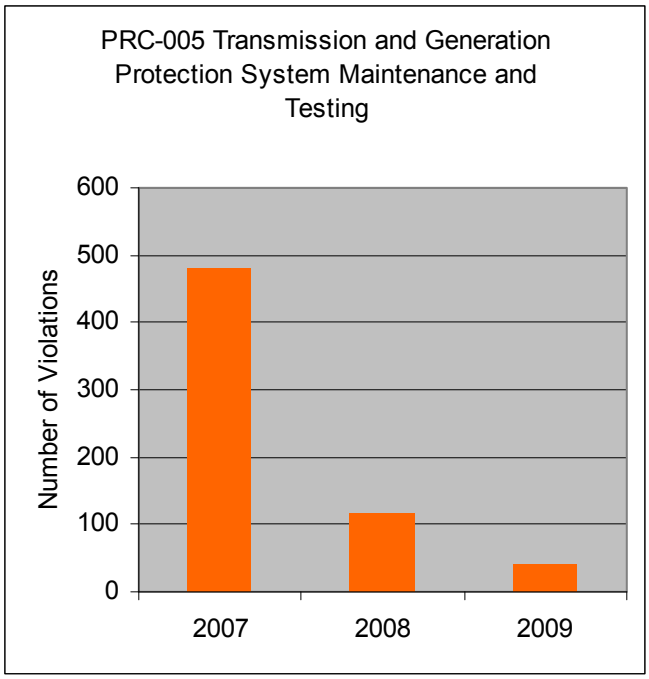
To date, there have been two versions of the standard: PRC-005-0, and PRC-005-1.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is charted below shown based on the annual percentage of compliant entities.



PRC-005 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically below based on the annual number of violations:



There were almost 500 violations in 2007, approximately one quarter of that number in 2008, and approximately one third of that in 2009.

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established based on the documentation of the maintenance and testing program, and whether or not the program was on schedule.

Level 1 Violation	Documentation of the maintenance and testing program was incomplete, but records indicate implementation was on schedule.
Level 2 Violation	Complete documentation of the maintenance and testing program was provided, but records indicate implementation was not on schedule.
Level 3 Violation	Documentation of the maintenance and testing program was incomplete, but records indicate implementation was not on schedule.
Level 4 Violation	Documentation of the maintenance and testing program, or its implementation, was not provided.

PRC-005-0 Levels of Non-Compliance

Version 1 of the standard modified the requirements, but kept the same general Levels of Non-Compliance:

Level 1 Violation	Documentation of the maintenance and testing program provided was incomplete as required in R1, but records indicate maintenance and testing did occur within the identified intervals for the portions of the program that were documented.

Level 2 Violation	Documentation of the maintenance and testing program provided was complete as required in R1, but records indicate maintenance and testing did not occur within the defined intervals.
Level 3 Violation	Documentation of the maintenance and testing program provided was incomplete, and records indicate implementation of the documented portions of the maintenance and testing program did not occur within the identified intervals.
Level 4 Violation	Documentation of the maintenance and testing program, or its implementation, was not provided.

PRC-005-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs included the limited measures from the Levels of Non-Compliance but provided significantly more detail, adding multiple specific VSLs for each requirement. In other words, the original criteria were retained, and several more added.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Removed "quartiles" from the VSLs and instead used smaller magnitude percentages in determining severity.
- VSLs for components of requirements R1 and R2 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

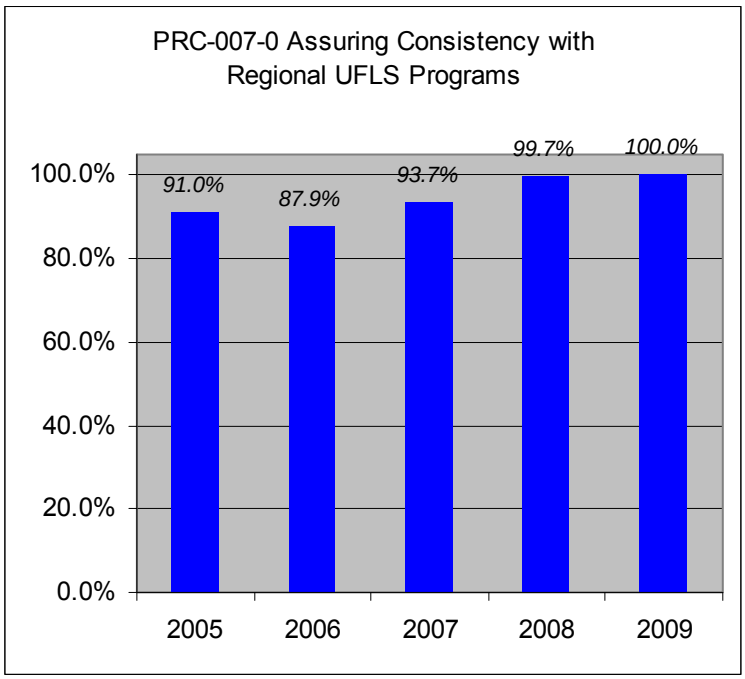
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were equally or more stringent than those defined in the original Levels of Non-Compliance, and the VSLs within this filing are consistent with those VSLs. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of PRC-007 — Assuring Consistency with Regional UFLS

Description of Standard
PRC-007 is intended to ensure that entities participate in Under Frequency Load Shedding (UFLS) programs as defined within their region.

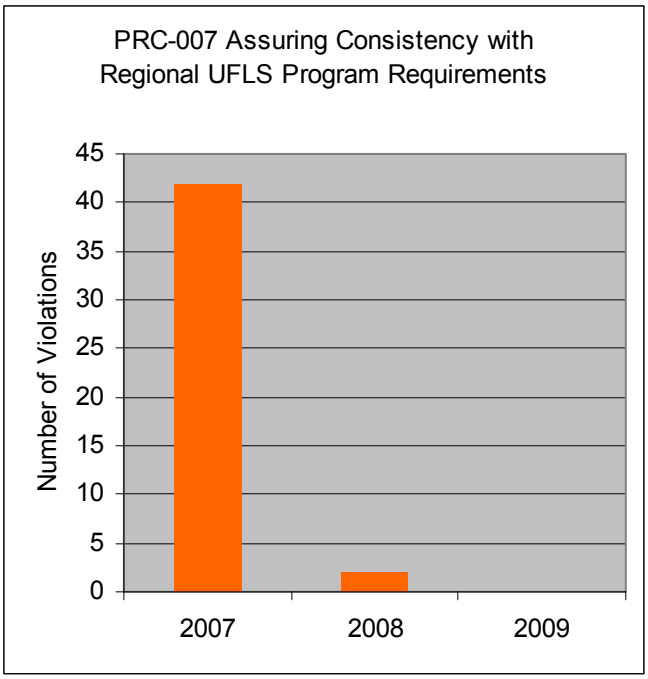
To date, there is only one FERC-approved version of the standard.

Historical Performance
NERC has reviewed compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is presented graphically based on the annual percentage of compliant entities.



PRC-007 Historical Performance

For 2007, 2008, and 2009, the data is charted below based on the annual number of violations:



There were several violations in 2007, two in 2008, and none in 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established based on how consistent an entity's UFLS program was with the program definitions of the Regional Reliability Organization.

Level 1 Violation	The evaluation of the entity's UFLS program for consistency with the Regional Reliability Organization's UFLS program is incomplete or inconsistent in one or more requirements of Reliability Standard PRC-006-0_R1, but is consistent with the required amount of Load shedding.
Level 2 Violation	The amount of load shedding is less that 95 percent of the Regional requirement in any of the load steps.
Level 3 Violation	The amount of load shedding is less that 90 percent of the Regional requirement in any of the load steps.
Level 4 Violation	The evaluation of the entity's UFLS program for consistency with the Regional Reliability Organization's UFLS program was not provided or the amount of load shedding is less that 85 percent of the Regional requirement on any of the load steps.

PRC-007-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and translated them to VSLs for requirements R1 and R3. Additionally,

VSLs were added for Requirement R2, which was not previously included in the Levels of Non-Compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Requirement R2 was modified to account for the timeliness of the provision of data and to be more consistent with the requirement.

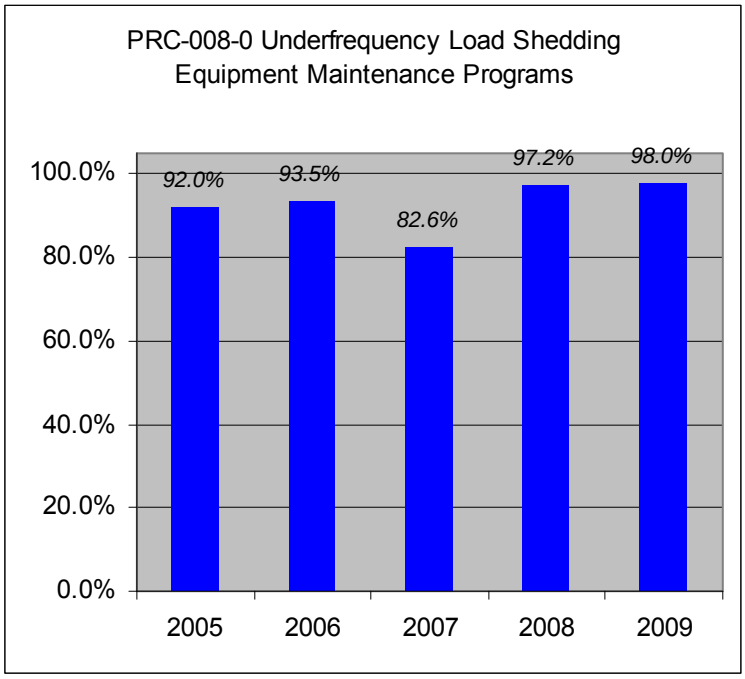
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were consistent with those defined in the original Levels of Non-Compliance, and added a new set of criteria as well that was more stringent. The VSLs within this filing are consistent with those VSLs. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of PRC-008 — Underfrequency Load Shedding Equipment Maintenance Programs

Description of Standard
PRC-008 is intended to ensure that entities participating in UFLS programs appropriately maintain their UFLS equipment.

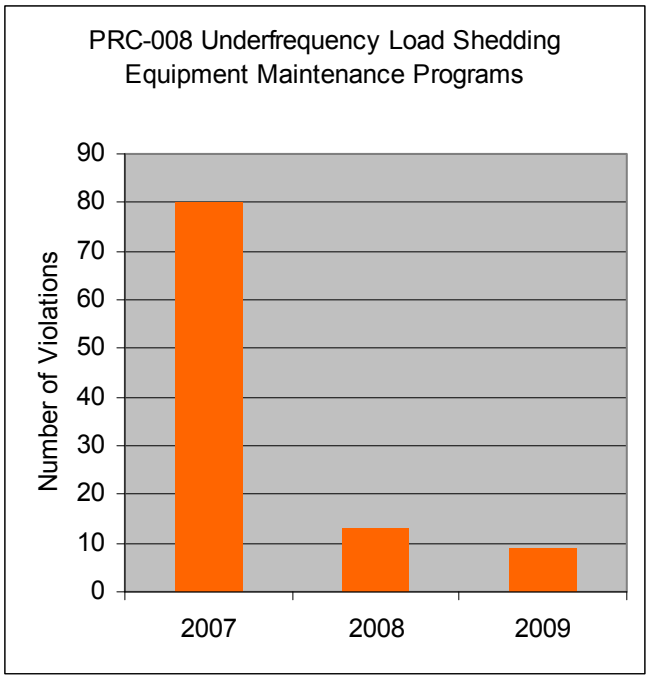
To date, there is only one FERC-approved version of the standard.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is charted below based on the annual percentage of compliant entities.



PRC-008 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically below based on the annual number of violations:



There were a large number of violations in 2007, far less in 2008, and still less in 2009.

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established based on the documentation of the maintenance and testing program, and whether or not the program was on schedule.

Level 1 Violation	Documentation of the maintenance and testing program was incomplete, but records indicate implementation was on schedule.
Level 2 Violation	Complete documentation of the maintenance and testing program was provided, but records indicate implementation was not on schedule.
Level 3 Violation	Documentation of the maintenance and testing program was incomplete, but records indicate implementation was not on schedule.
Level 4 Violation	Documentation of the maintenance and testing program, or its implementation, was not provided.

PRC-008 Levels of Non-Compliance

In FERC's June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs provided significantly more detail, adding multiple specific VSLs for each requirement.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R1 and R2 for clarity and consistency with other standards and VSLs.
- Modified the VSLs for Requirement R2 to be consistent with FERC Guideline 3.

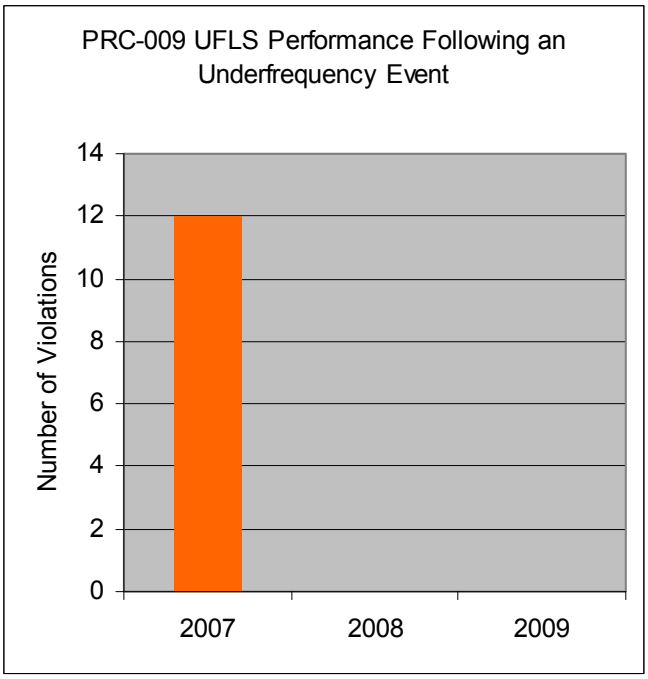
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. The compliance data for this standard is limited and the VSLs have not changed significantly over time. 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 1 Analysis of PRC-009 — ULFS Performance Following an Underfrequency Event

Description of Standard
PRC-009 is intended to provide last resort System preservation measures by implementing an Under Frequency Load Shedding (UFLS) program.

To date, there is only one FERC-approved version of the standard.

Historical Performance
For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There were a limited number of violations in 2007, and none in 2008 and 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R1 and R2.

Level 1 Violation	Analysis of UFLS program performance following an actual underfrequency event below the UFLS set point(s) was incomplete in one or more elements in Reliability Standard PRC-009-0_R1.
Level 2 Violation	N/A
Level 3 Violation	N/A
Level 4	Analysis of UFLS program performance following an actual underfrequency event

Violation	below the UFLS set point(s) was not provided.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1 and R2 with other details that more fully address a violation.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.
- Modified the VSLs for Requirement R2 to be consistent with FERC Guideline 3.

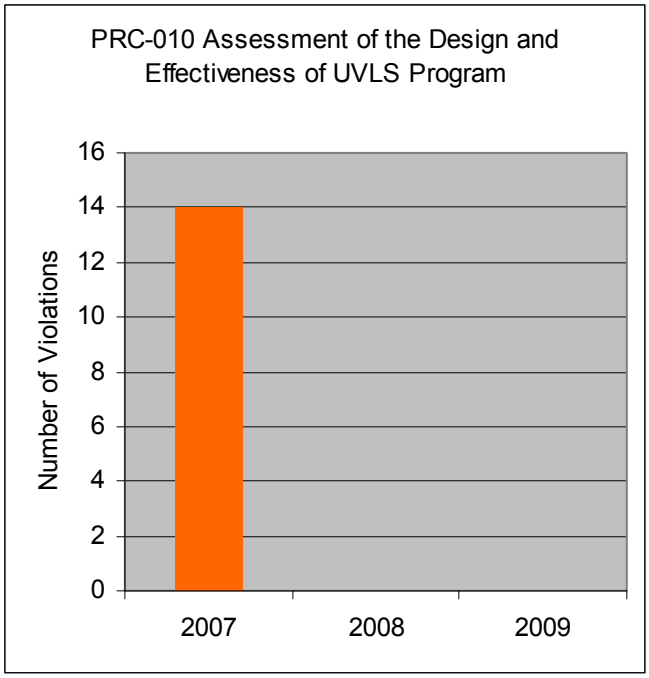
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines. The VSLs have not changed significantly over time. Although proposed for modification, the VSLs as modified do not signal a lower compliance threshold than previously existed. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of PRC-010 — Assessment of the Design and Effectiveness of UVLS Program

Description of Standard
PRC-010 is intended to provide system preservation measures in an attempt to prevent system voltage collapse or voltage instability by implementing an Undervoltage Load Shedding (UVLS) Program.

To date, there is only one FERC-approved version of the standard.

Historical Performance
For 2007, 2008, and 2009, compliance data is charted below based on the annual number of violations:



There were several violations in 2007, and none in 2008 and 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R1 and R2.

Level 1 Violation	N/A
Level 2 Violation	N/A
Level 3 Violation	N/A
Level 4 Violation	An assessment of the UVLS program did not address one of the three requirements listed in Reliability Standard PRC-010-0_R1.1 or an assessment of the UVLS program was not provided.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance and incorporated them into VSLs for requirements R1 and R2 along with additional details to address other violations.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R1 for clarity and consistency with other standards and VSLs
- Modified the VSLS for Requirement R2 to be consistent with FERC Guideline 2.
- VSLs for components of requirements R1 and R2 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

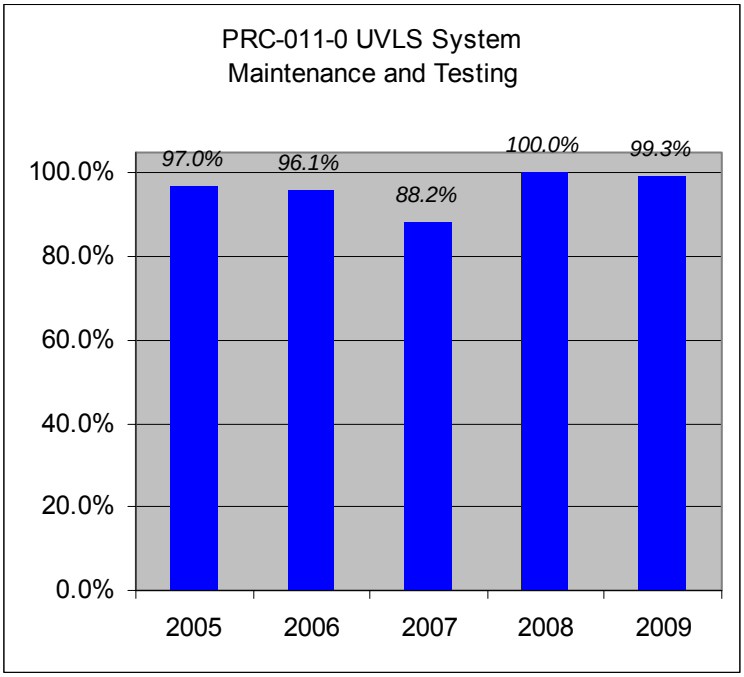
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency with NERC's approach for incorporating VSLs from sub-requirements into those of the main requirement. The compliance data on this standard is limited, while 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 1 Analysis of PRC-011 — UVLS System Maintenance and Testing

Description of Standard
PRC-011 is intended to ensure that entities with UVLS systems appropriately maintain their UVLS equipment.

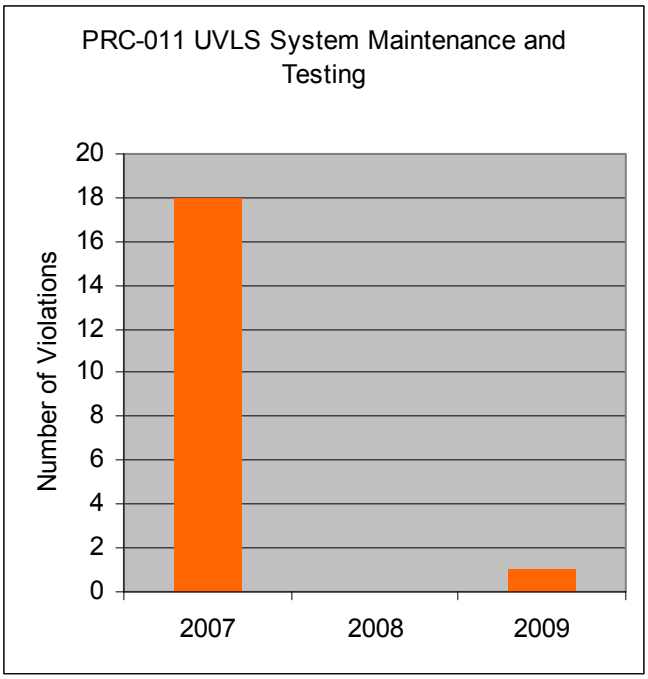
To date, there is only one FERC-approved version of the standard.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is charted below based on the annual percentage of compliant entities.



PRC-011 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically below based on the annual number of violations:



There were a number of violations in 2007, none in 2008, and only one in 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established based on the documentation of the maintenance and testing program, and whether or not the program was on schedule.

Level 1 Violation	Documentation of the maintenance and testing program was incomplete, but records indicate implementation was on schedule.
Level 2 Violation	Complete documentation of the maintenance and testing program was provided, but records indicate implementation was not on schedule.
Level 3 Violation	Documentation of the maintenance and testing program was incomplete, but records indicate implementation was not on schedule.
Level 4 Violation	Documentation of the maintenance and testing program, or its implementation, was not provided.

PRC-011-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs included the limited criteria from the Levels of Non-Compliance but provided significantly more detail, adding multiple specific VSLs for each requirement. In other words, the original criteria were retained, and several more added.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R1 to be consistent with FERC Guideline 2.
- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.
- Modified the VSLs for Requirement R2 for clarity and consistency with other standards and VSLs.

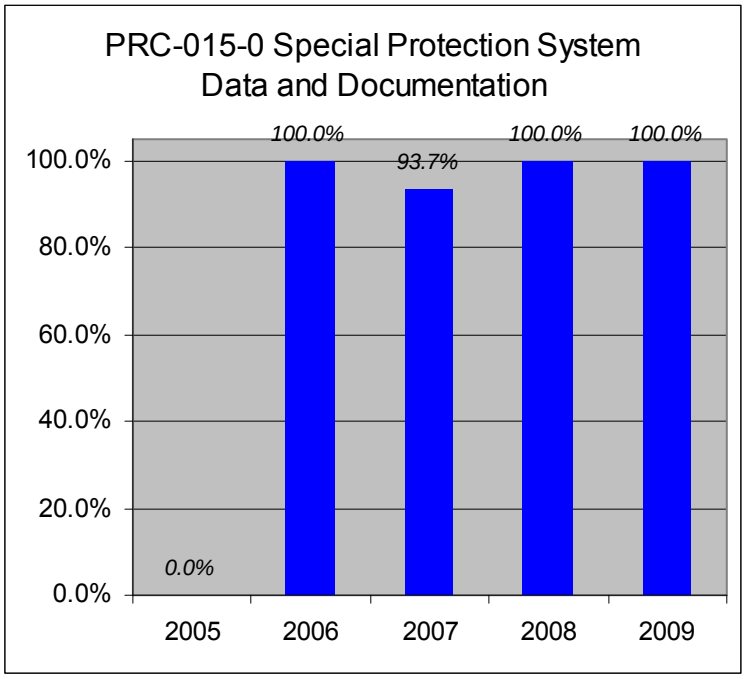
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency with NERC's approach for incorporating VSLs from sub-requirements into those of the main requirement. 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.

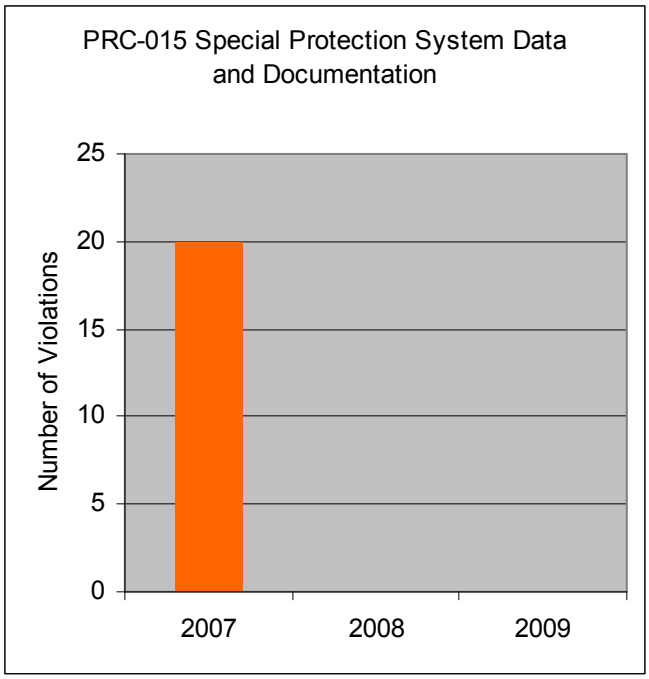
Guideline 1 Analysis of PRC-015 — Special Protection System Data and Documentation

PRC-015 is intended to ensure that all Special Protection Systems (SPS) are properly designed, meet performance requirements, and are coordinated with other protection systems, and that maintenance and testing programs are developed and misoperations are analyzed and corrected.

To date, there is only one FERC-approved version of the standard.

Historical Performance
NERC has compliance data for this standard for 2006, 2007, 2008, and 2009. This data is shown based on the percentage of compliant entities in graphical form below:





There were twenty violations in 2007, and none in 2008 and 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R1, R2, and R3.

Level 1 Violation	• SPS owners provided SPS data, but data was incomplete according to the Regional Reliability Organization SPS database requirements.
Level 2 Violation	• SPS owners provided results of studies that show compliance of new or functionally modified SPSs with the NERC Planning Standards and Regional Reliability Organization criteria, but were incomplete according to the Regional Reliability Organization procedures for Reliability Standard PRC-012-0_R1.
Level 3 Violation	N/A
Level 4 Violation	• No SPS data was provided in accordance with Regional Reliability Organization SPS database requirements for Standard PRC-012-0_R1, or the results of studies that show compliance of new or functionally modified SPSs with the NERC Reliability Standards and Regional Reliability Organization criteria were not provided in accordance with Regional Reliability Organization procedures for Reliability Standard PRC-012-0_R1.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1, R2, and R3.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLS for requirements R1, R2, and R3 to be consistent with FERC Guideline 2.

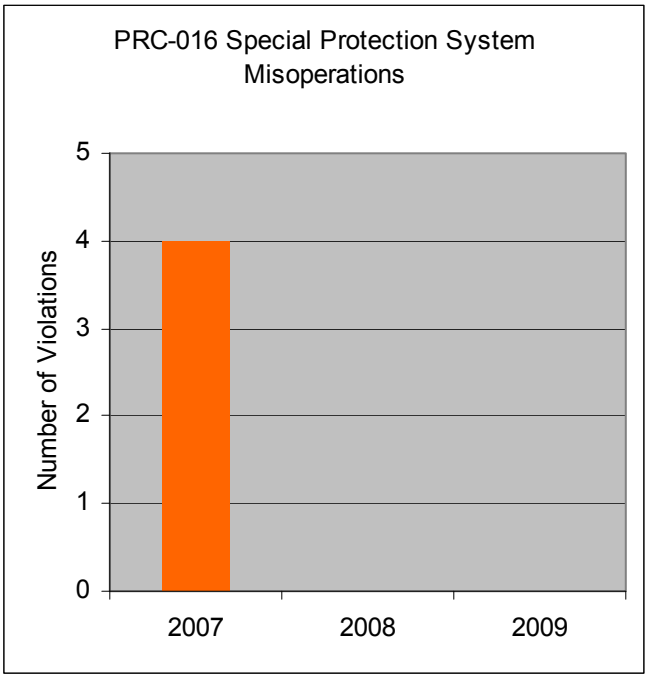
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines. The compliance data for this standard is limited, while the VSLs have not changed significantly over time. Although proposed for modification, 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 1 Analysis of PRC-016 — Special Protection System Misoperations

Description of Standard
PRC-016 is intended to ensure that all Special Protection Systems (SPS) are properly designed, meet performance requirements, and are coordinated with other protection systems, and that maintenance and testing programs are developed and misoperations are analyzed and corrected.

To date, there is only one FERC-approved version of the standard.

Historical Performance
For 2007, 2008, and 2009, compliance data is charted below based on the annual number of violations:



There were four violations in 2007 and none in 2008 and 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R1 and R2.

Level 1 Violation	Documentation of SPS misoperations is complete but documentation of corrective actions taken for all identified SPS misoperations is incomplete.
Level 2 Violation	Documentation of corrective actions taken for SPS misoperations is complete but documentation of SPS misoperations is incomplete.
Level 3 Violation	Documentation of SPS misoperations and corrective actions is incomplete.
Level 4	No documentation of SPS misoperations or corrective actions.

Violation	

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1 and R2. Additionally, VSLs were added to address Requirement R3, which was not previously assigned Levels of Non-Compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R1 to be consistent with FERC Guideline 2 and 3.
- Modified the VSLs for Requirement R2 to be consistent with FERC Guideline 4.
- Modified the VSLs for Requirement R2 for clarity and consistency with other standards and VSLs.
- Modified the VSLs for Requirement R3 to be consistent with FERC Guideline 2.

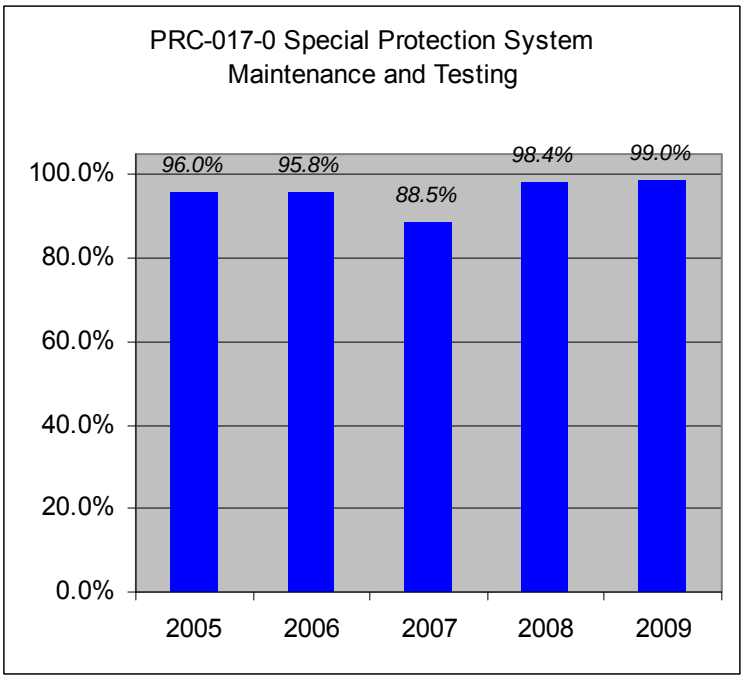
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency. The compliance data for this standard is limited, while with the exception of adding VSLs, the VSLs have 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 1 Analysis of PRC-017 — Special Protection System Maintenance and Testing

Description of Standard
PRC-017 is intended to ensure that entities implementing Special Protection Systems (SPSs) do so in a reliable manner, as well as testing and maintaining those systems and addressing any related misoperations.

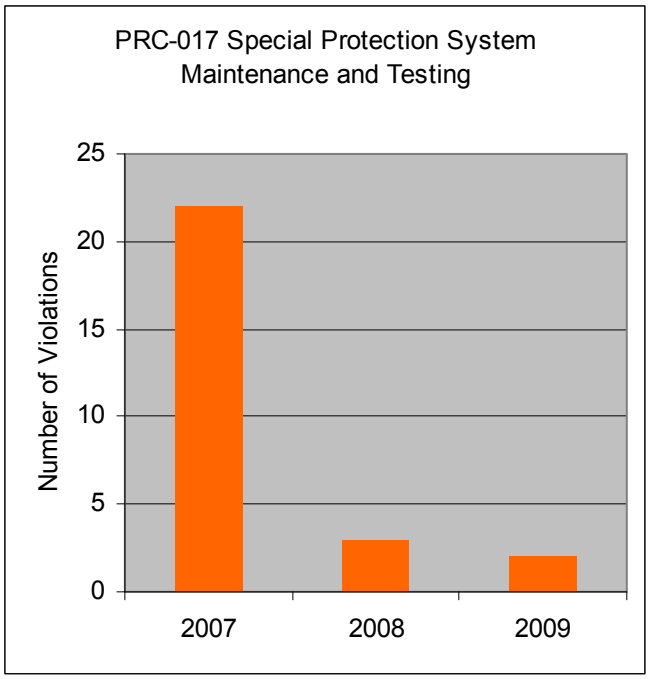
To date, there is only one FERC-approved version of the standard.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is charted below based on the annual percentage of compliant entities.



PRC-017 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically below based on the annual number of violations:



There were several violations in 2007, and a small number of violations in 2008 and 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established based on the documentation of the maintenance and testing program, and whether or not the program was on schedule.

Level 1 Violation	Documentation of the maintenance and testing program was incomplete, but records indicate implementation was on schedule.
Level 2 Violation	Complete documentation of the maintenance and testing program was provided, but records indicate implementation was not on schedule.
Level 3 Violation	Documentation of the maintenance and testing program was incomplete, but records indicate implementation was not on schedule.
Level 4 Violation	Documentation of the maintenance and testing program, or its implementation, was not provided.

PRC-017-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs provided significantly more detail, adding multiple specific VSLs for each requirement.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLS for requirements R1 and R2 to be consistent with FERC Guideline 2.

- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

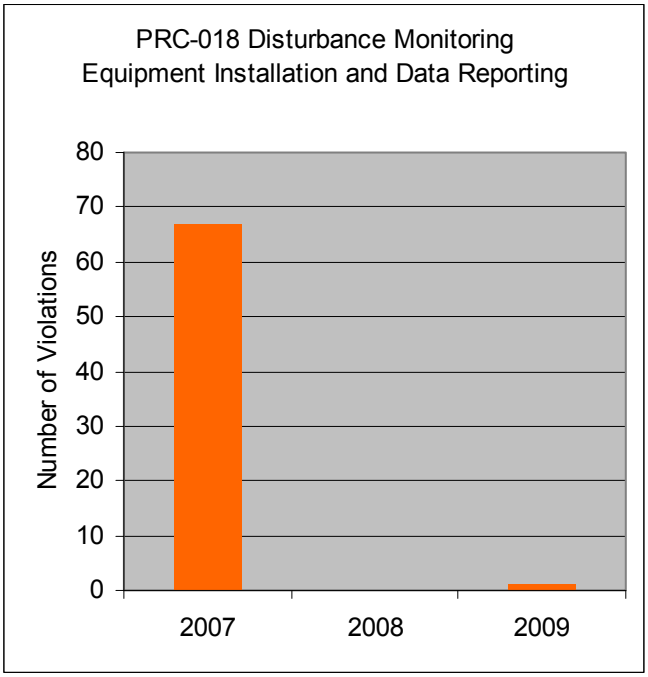
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and NERC's approach for incorporating VSLs from sub-requirements into those of the main requirement. The VSLs have not changed significantly 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 1 Analysis of PRC-018 — Disturbance Monitoring Equipment Installation and Data Reporting

Description of Standard
PRC-018 is intended to ensure that Disturbance Monitoring Equipment (DME) is installed and that Disturbance data is reported in accordance with regional requirements to facilitate analyses of events

To date, there is only one FERC-approved version of the standard.

Historical Performance
For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There were several violations of the standard in 2007, none in 2008, and only one in 2009.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for requirements R1, R2, R3, R4, R5, and R6.

Level 1 Violation	• DMEs that meet all the Regional Reliability Organization's installation requirements (in accordance with Requirement 2) were installed at 90% or more but not all of the required locations. • Recorded Disturbance data that meets all Regional Reliability Organization's Disturbance data requirements (in accordance with Requirement 4) was provided for 90% or more but not all of the required locations. • Data on required DMEs was incomplete (in accordance with R3) • Documentation of the DME maintenance and testing program provided was

	incomplete as required in R6, but records indicate maintenance and testing did occur within the identified intervals for the portions of the program that were documented.
Level 2 Violation	• DMEs that meet all Regional Reliability Organization's installation requirements (in accordance with R2) were installed at 80% or more but less than 90% of the required locations. • Recorded Disturbance data that meets all Regional Reliability Organization's Disturbance data requirements (in accordance with R4) was provided for 80% or more but less than 90% of the required locations. • Recorded Disturbance data was not provided to all required entities (in accordance with R4) • Archived data was not retained for three years (in accordance with Requirement 5). • Documentation of the DME maintenance and testing program provided was complete as required in R6, but records indicate that maintenance and testing did not occur within the defined intervals.
Level 3 Violation	• DMEs that meet all Regional Reliability Organization's installation requirements (in accordance with R2) were installed at 70% or more but less than 80% of the required locations. • Recorded Disturbance data that meets all Regional Reliability Organization's Disturbance data requirements (in accordance with R4) was provided for 70% or more but less than 80% of the required locations. • Documentation of the DME maintenance and testing program provided was incomplete as required in R6, and records indicate implementation of the documented portions of the maintenance and testing program did not occur within the identified intervals.
Level 4 Violation	• DMEs that meet all Regional Reliability Organization's installation requirements (in accordance with R2) were installed at less than 70% of the required locations. • Recorded Disturbance data that meets all Regional Reliability Organization's Disturbance data requirements (in accordance with R4) was provided for less than 70% of the required locations. • DMEs that meet all functional requirements (in accordance with R1) were not installed at all required locations. • Documentation of the DME maintenance and testing program was not provided, or no evidence that the testing program did occur within the identified intervals

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1, R2, R3, R4, R5, and R6.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLS for requirements R1, R2, R3, R4, R5 and R6 to be consistent with FERC Guideline 2.
- Modified the VSLs for requirements R2, R4, R5, and R6 for clarity and consistency with other standards and VSLs.
- VSLs for components of requirements R1 and R3 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

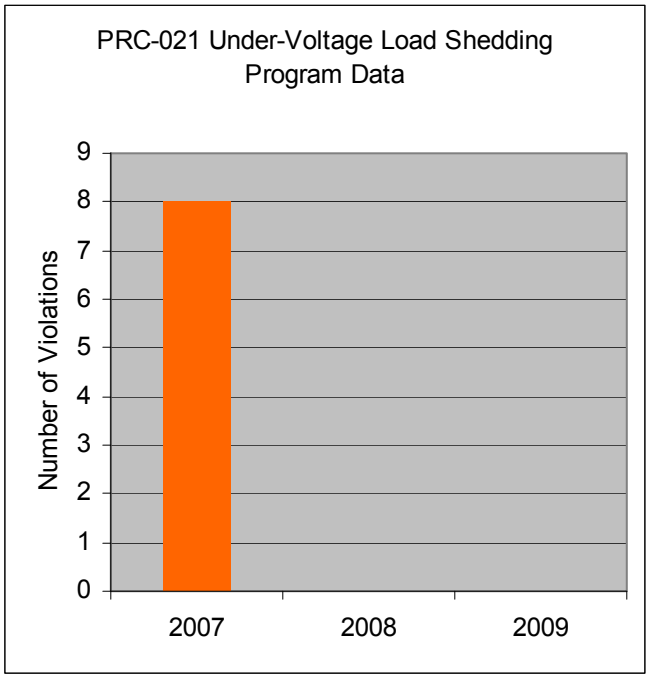
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency with NERC's approach for incorporating VSLs from sub-requirements into those of the main requirement. However, the VSLs have not changed significantly over time. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of PRC-021 — Under-Voltage Load Shedding Program Data

Description of Standard
PRC-021 is intended to ensure data is provided to support the Regional database maintained for Under-Voltage Load Shedding (UVLS) programs that were implemented to mitigate the risk of voltage collapse or voltage instability in the Bulk Electric System (BES).

To date, there is only one FERC-approved version of the standard.

Historical Performance
For 2007, 2008, and 2009, compliance data is charted below based on the annual number of violations:



There were eight violations in 2007, and none in 2008 and 2009.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for requirements R1 and R2.

Level 1 Violation	Did not update its UVLS data annually.
Level 2 Violation	UVLS data was provided, but did not address one of the items identified in R1.1 through R1.5.
Level 3 Violation	UVLS data was provided, but did not address two or more of the items identified in R1.1 through R1.5
Level 4	Did not provide any UVLS data.

Violation	

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance and incorporated them into the VSLs for requirements R1 and R2. Additional detail was also added for requirements R1 and R2.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLS for requirements R1 and R2 to be consistent with FERC Guideline 2.
- Modified the VSLs for Requirement R1 for clarity and consistency with other standards and VSLs.
- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

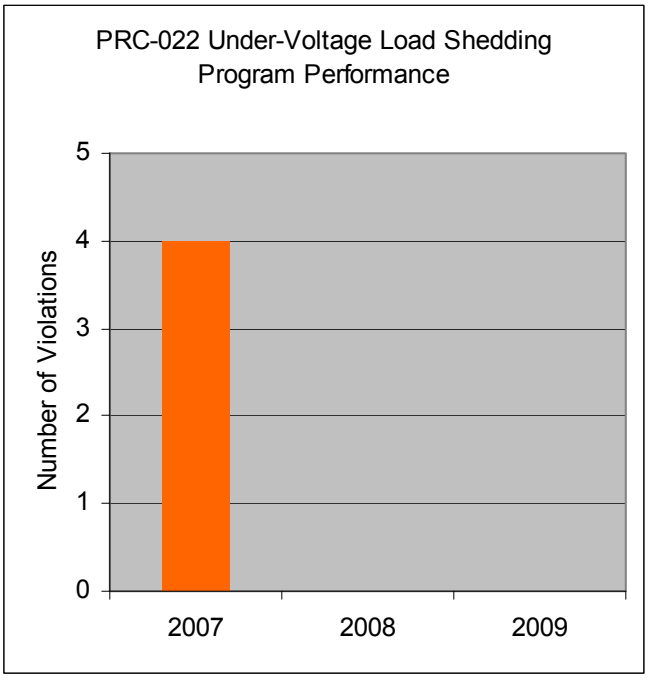
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency with NERC's approach for incorporating VSLs from sub-requirements into those of the main requirement. The compliance data for this standard is limited, and 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 1 Analysis of PRC-022 — Under-Voltage Load Shedding Program Performance

Description of Standard
PRC-022 is intended to ensure that Under Voltage Load Shedding (UVLS) programs perform as intended to mitigate the risk of voltage collapse or voltage instability in the Bulk Electric System (BES).

To date, there is only one FERC-approved version of the standard.

Historical Performance
For 2007, 2008, and 2009, the data is presented graphically based on the number of violations:



There were four violations in 2007, and none in 2008 and 2009.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for requirements R1 and R2.

Level 1 Violation	N/A
Level 2 Violation	Documentation of the analysis of UVLS performance was provided but did not include one of the five requirements in R1.
Level 3 Violation	Documentation of the analysis of UVLS performance was provided but did not include two or more of the five requirements in R1.

Level 4 Violation	Documentation of the analysis of UVLS performance was not provided.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1 and R2. Additional detail was provided as well.

Proposed Compliance Criteria Following FERC Guideline Review

NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLS for requirements R1 and R2 to be consistent with FERC Guideline 2.
- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

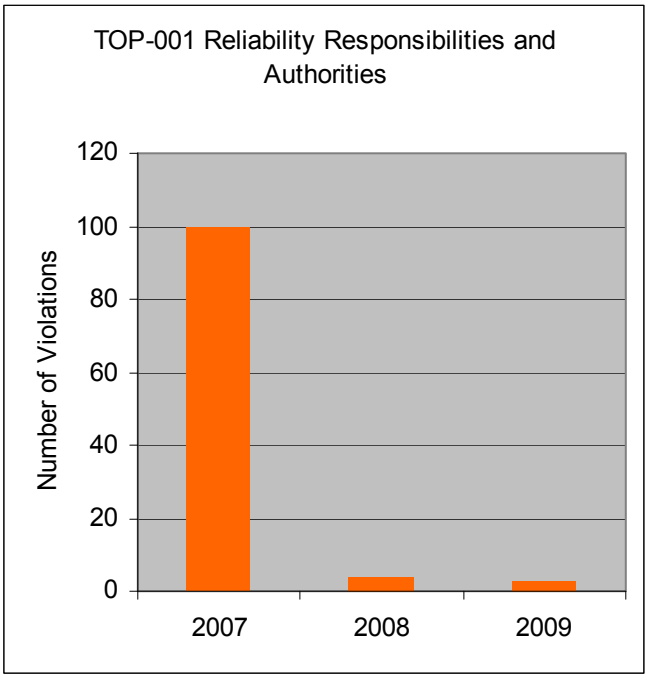
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and NERC's approach for incorporating VSLs from sub-requirements into those of the main requirement. There is limited available compliance data on this standard, while 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 1 Analysis of TOP-001 — Reliability Responsibilities and Authorities

Description of Standard
TOP-001 is intended to ensure reliability entities have clear decision-making authority and capabilities to take appropriate actions or direct the actions of others to return the transmission system to normal conditions during an emergency

To date, there have been two versions of the standard — TOP-001-0 and TOP-001-1.

Historical Performance
For 2007, 2008, and 2009, compliance data is charted below based on the annual number of violations:



There were a large number of violations in 2007, and a limited number of violations in 2008 and 2009.

Past Compliance Criteria
In Version 1 of this standard, Levels of Non-Compliance were established for requirements R1, R2, R3, R4, R5, R6, and R7.

Level 1 Violation	N/A
Level 2 Violation	N/A
Level 3 Violation	N/A

Level 4 Violation	Balancing Authority • Did not comply with a Reliability Coordinator's or Transmission Operator's reliability directive or did not immediately inform the Reliability Coordinator or Transmission Operator of its inability to perform that directive (R3) • Did not render emergency assistance to others as requested, in accordance with R6. Transmission Operator • Does not have the documented authority to act as specified in R1. • Does not have evidence it acted with the authority specified in R1. • Did not take immediate actions to alleviate operating emergencies as specified in R2. • Did not comply with its Reliability Coordinator's reliability directive or did not immediately inform the Reliability Coordinator of its inability to perform that directive, as specified in R3. • Did not inform its Reliability Coordinator and other potentially affected Transmission Operators of real time or anticipated emergency conditions as specified in R5. • Did not take actions to avoid, when possible, or to mitigate an emergency as specified in R5. • Did not render emergency assistance to others as requested, as specified in R6. • Removed Bulk Electric System facilities from service under conditions other than those specified in R7.1, 7.2, and 7.3, and removing those facilities burdened a neighbor system. Generator Operator • Did not comply with a Reliability Coordinator or Transmission Operator's reliability directive or did not immediately inform the Reliability Coordinator or Transmission Operator of its inability to perform that directive, as specified in R3. • Did not render all available emergency assistance to others as requested, unless such actions would violate safety, equipment, or regulatory or statutory requirements as specified in R6. • Removed Bulk Electric System facilities from service under conditions other than those specified in R7.1, 7.2, and 7.3, and burdened a neighbor system. Distribution Provider or Load Serving Entity • Did not comply with a Transmission Operator's reliability directive or immediately inform the Transmission Operator of its inability to perform that directive, as specified in R4.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1, R2, R3, R4, R5, R6, and R7. Additionally, VSLs were added to address Requirement R8, which was not previously assigned Levels of Non-Compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLS for requirements R1, R5, and R8 for clarity and consistency with other standards and VSLs.
- Modified the VSLS for Requirement R5, R7 and R8 to be consistent with FERC Guideline 2.
- VSLs for components of Requirement R7 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency with NERC's approach for incorporating VSLs from sub-requirements into those of the main requirement. 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 1 Analysis of TOP-002 — Normal Operations Planning

Description of Standard
TOP-002 is intended to ensure that current operations plans and procedures are available so that entities are prepared for reliable operations, including response for unplanned events.

To date, there have been three versions of the standard — TOP-002-0, TOP-002-1, and TOP-002-2.

Historical Performance
For 2007, 2008, and 2009, compliance data is charted below based on the annual number of violations:

There were a large number of violations in 2007, far less in 2008, and still less in 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R1, R5, R6, R7, R8, R9, R10, R11, R16, and R18.

Level 1 Violation	Balancing Authorities • Did not use uniform line identifiers when referring to transmission facilities of an interconnected network as specified in R18. Transmission Operators • Did not use uniform line identifiers when referring to transmission facilities of an interconnected network as specified in R18.
Level 2 Violation	N/A
Level 3 Violation	Transmission Operators • One or more of Bulk Electric System studies were not made available as specified in R11.
Level 4 Violation	Balancing Authorities • Did not maintain an updated set of current-day plans as specified in R1. • Plans did not meet one or more of the requirements specified in R5 through R10. Transmission Operators • Did not maintain an updated set of current-day plans as specified in R1. • Plans did not meet one or more of the requirements in R5, R6, and R10. • Studies not updated to reflect current system conditions as specified in R11. • Did not notify its Balancing Authority and Reliability Coordinator of changes in capabilities and characteristics as specified in R16.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1, R5, R6, R7, R8, R9, R10, R11, R16, and R18. Additional detail was added, and new VSLs were included for requirements R2, R3, R4, R12, R13, R14, R15, R17, and R19, which were not previously assigned Levels of Non-Compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLS for requirements R1 and R15 for clarity and consistency with other standards and VSLs.
- Modified the VSLS for requirements R3, R4, R11, and R17 to be consistent with FERC Guideline 3.

- VSLs for components of requirements R14 and R16 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

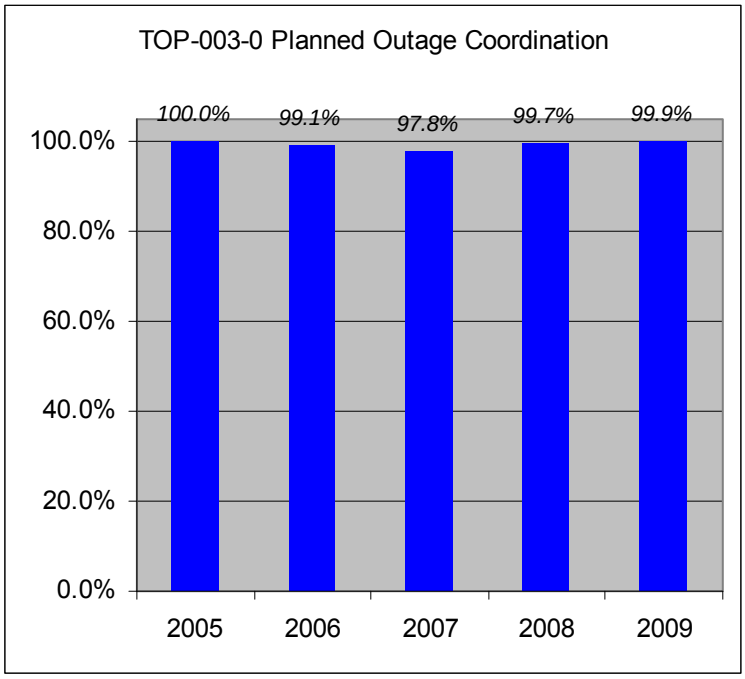
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency with NERC's approach for incorporating VSLs from sub-requirements into those of the main requirement. The compliance data for this standard is limited, and with the exception of adding VSLs, 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 1 Analysis of TOP-003 — Planned Outage Coordination

Description of Standard
TOP-003 is intended to ensure that scheduled generation and transmission outages are appropriately coordinated between Generator Operators, Transmission Operators, Balancing Authorities, and Reliability Coordinators.

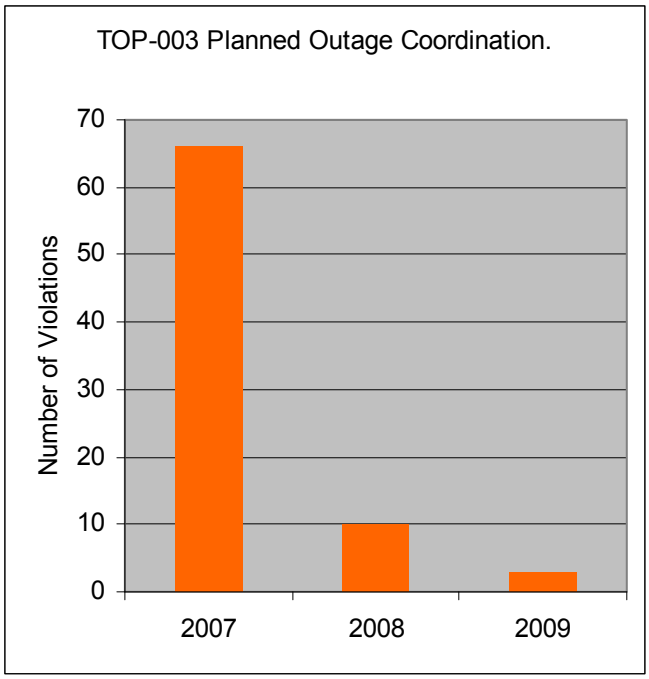
To date, there is only one FERC-approved version of the standard.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is charted below based on the percentage of annual compliant entities.



TOP-003 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically below based on the annual number of violations:



There were several violations in 2007, ten in 2008, but three in 2009.

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established based on the provision of information (from Requirement R1, and to some extent, R3) and whether or not entities followed Reliability Coordinator directives that may have arisen from implementation of Requirement R4. There were two defined Levels of Non-Compliance:

Level 1 Violation	Each entity responsible for reporting information under Requirements R1 and R3 has a process in place to provide information to their Reliability Coordinator but does not have a process in place (where permitted by legal agreements) to provide this information to the neighboring Balancing Authority or Transmission Operator.
Level 2 Violation	N/A
Level 3 Violation	N/A
Level 4 Violation	There is no process in place to exchange outage information, or the entity responsible for reporting information under Requirements R1 to R3 does not follow the directives of the Reliability Coordinator to cancel or reschedule an outage.

TOP-003-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs included the limited criteria from the Levels of Non-Compliance but provided significantly more detail, adding multiple specific VSLs for each requirement. In other words, the original criteria were retained, and several more added.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R1.3 for clarity and consistency with other standards and VSLs.
- Modified the VSLs for requirements R1.1, R1.2, and R3 to be consistent with FERC Guideline 3.

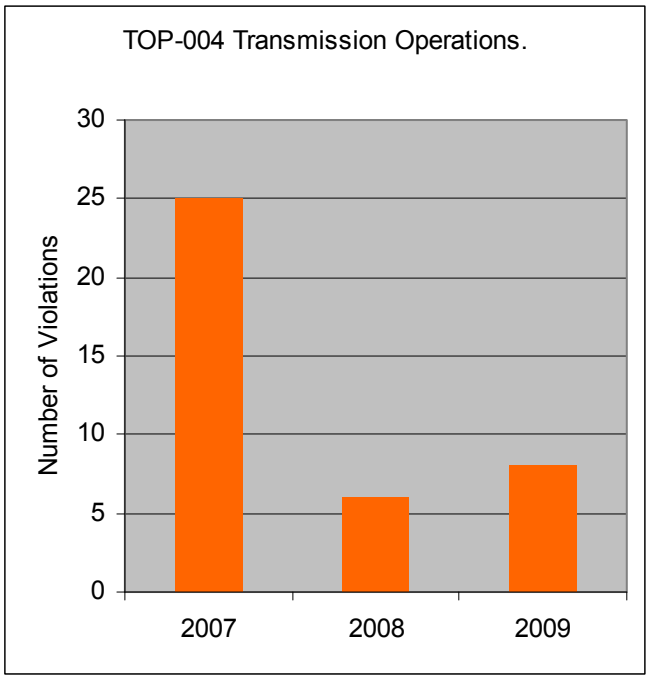
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were more stringent than those defined in the original Levels of Non-Compliance. The VSLs within this filing are consistent with those VSLs, and for requirements R1.3 and R3, the VSLs are more stringent than the March 2008 filing. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of TOP-004 — Transmission Operations

Description of Standard
TOP-004 is intended to ensure that the transmission system is operated so that instability, uncontrolled separation, or cascading outages will not occur as a result of the most severe single Contingency or specified multiple Contingencies.

To date, there have been three versions of the standard — TOP-004-0, TOP-004-1, and TOP-004-2.

Historical Performance
For 2007, 2008, and 2009, compliance data is charted below based on the annual number of violations:



There were twenty-five violations in 2007, six in 2008, and eight in 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R4 and R6.

Level 1 Violation	N/A
Level 2 Violation	• Did not have formal policies and procedures to address one of the topics listed in R6.1 through R6.4.
Level 3 Violation	• Did not have formal policies and procedures to address two of the topics listed in R6.1 through R6.4.
Level 4 Violation	• Did not restore operations to respect proven reliable power system limits within 30 minutes as specified in R4. • Did not have formal policies and procedures to address three or all of the topics listed in R6.1 through R6.4.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R4 and R6. Additional detail was added, and new VSLs were added to address requirements R1, R2, R3, and R5, which were not previously assigned Levels of Non-Compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLS for requirements R1, R3, R4, R5, and R6 to be consistent with FERC Guideline 3.
- VSLs for components of Requirement R6 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

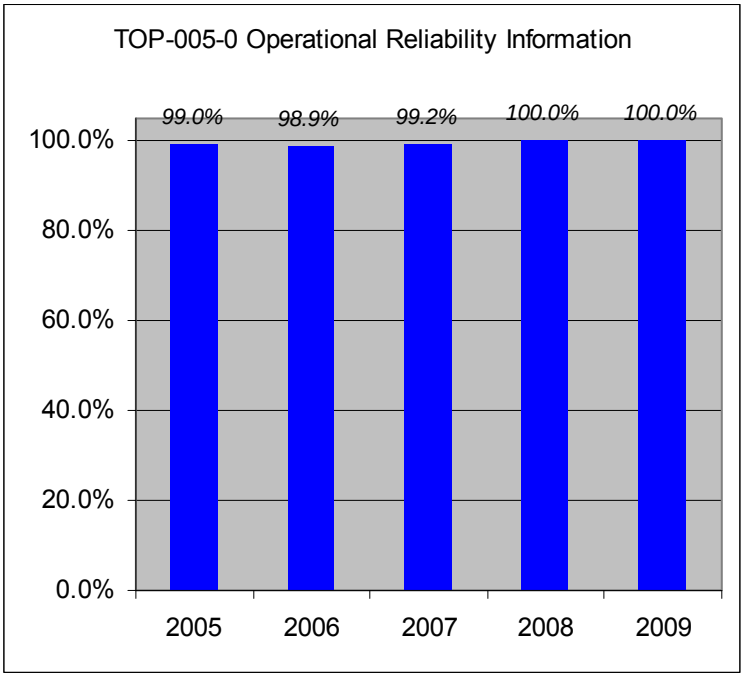
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and NERC's approach for incorporating VSLs from sub-requirements into those of the main requirement. With the exception of adding new VSLs, 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 1 Analysis of TOP-005 — Operational Reliability Information

Description of Standard
TOP-005 is intended to ensure that reliability entities have the operational data needed to monitor systems conditions within their area.

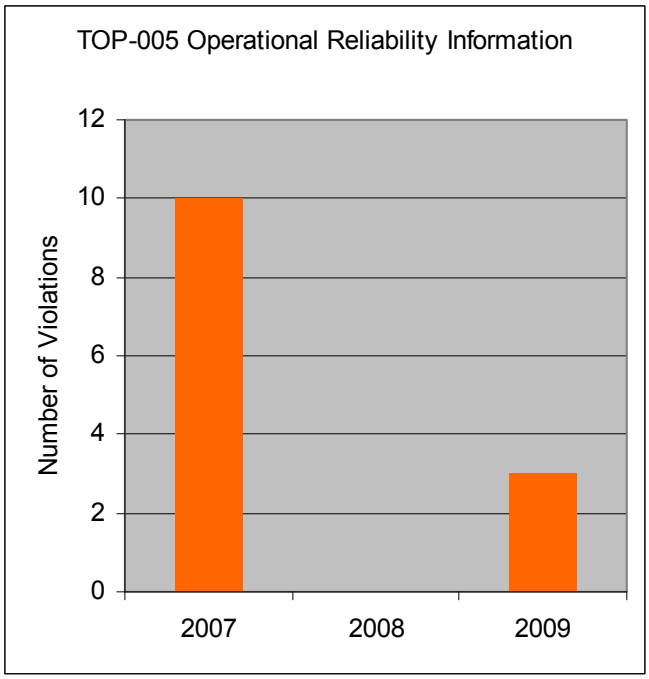
To date, there have been two versions of the standard: TOP-005-0, TOP-005-1.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is charted below based on the annual percentage of compliant entities.



TOP-005 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically below based on the annual number of violations:



There were ten violations in 2007, none in 2008, and three in 2009.

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established based on whether or not data was communicated reliably (or at all). There were two defined Levels of Non-Compliance:

Level 1 Violation	Each entity responsible for reporting information under Requirements R1 to R5 is providing the requesting entities with the data required, in specified time intervals and format, but there are problems with consistency of delivery identified in the measuring process that need remedy (e.g.. the data is not supplied consistently due to equipment malfunctions, or scaling is incorrect).
Level 2 Violation	N/A
Level 3 Violation	N/A
Level 4 Violation	Each entity responsible for reporting information under Requirements R1 to R5 is not providing the requesting entities with data with the specified content, timeliness, or format. The information missing is included in the requesting entity's list of data.

TOP-005-0 and TOP-005-1 Levels of Non-Compliance

Version 1 of the standard retained l Levels of Non-Compliance identical to those for Version 0.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs included the limited criteria from the Levels of Non-

Compliance but provided significantly more detail, adding multiple specific VSLs for each requirement. In other words, the original criteria were retained, and several more added. However, in R1, R3, and R4, the VSLs were split into multiple categories based on the amount of data provided, potentially lowering the thresholds of non-compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Per FERC Guideline 1, modified R1, R3, and R4 to be consistent with the Levels of Non-Compliance.
- Modified the VSLS for Requirement R1 to be consistent with FERC Guideline 3.

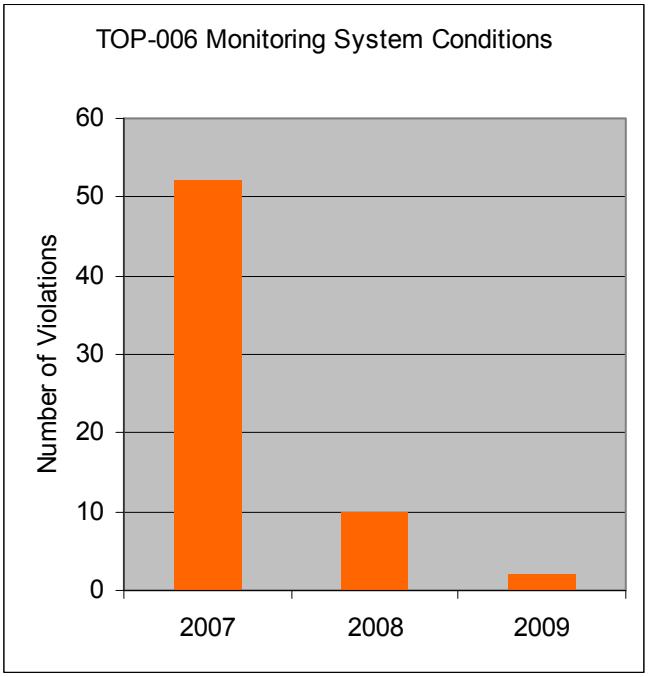
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines. Although proposed for modification, the VSLs as proposed do not signal a lower compliance threshold than previously existed. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of TOP-006 — Monitoring System Conditions

Description of Standard
TOP-006 is intended to ensure critical reliability parameters are monitored in real-time.

To date, there have been three versions of the standard — TOP-006-0, TOP-006-1, and TOP-006-2.

Historical Performance
For 2007, 2008, and 2009, compliance data is charted below based on the annual number of violations:



There were several violations in 2007, ten in 2008, and two in 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R1, R2, R4, R5, and R7.

Level 1 Violation	N/A
Level 2 Violation	N/A
Level 3 Violation	N/A
Level 4 Violation	Reliability Coordinator • Does not monitor all of the applicable items listed in Requirement 2. • Did not have the information specified in R4. • Did not bring to the attention of its operators, important deviations in operating conditions and the need for corrective actions. (Requirement 5) • No evidence it monitors system frequency. (Requirement 7) Generator Operator • Did not inform its Host Balancing Authority and/or the Transmission Operator of all generation resources available for use. (R1.1) Transmission Operator and Balancing Authority • Did not inform the Reliability Coordinator and/or other affected Balancing Authorities and Transmission Operators of all generation and transmission resources available for use in accordance with R1.2. • Does not monitor all the applicable items listed in R2. • Did not have the information specified in R4. • Does not have monitoring to bring to the attention of operating personnel important deviations in operating conditions and the need for corrective actions as specified in R5. • No evidence it monitors system frequency. (R7).

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1, R2, R4, R5, and R7. However, the VSLs for R2, R4, and R5 were split into multiple VSLs, potentially lowering the thresholds of non-compliance. Additional detail and VSLs for requirements R3 and R6 were added as well to address areas that were not assigned Levels of Non-Compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R3 for clarity and consistency with other standards and VSLs.
- Per FERC Guideline 1, modified the VSLs for R2, R4, and R5 to be consistent with the Levels of Non-Compliance.

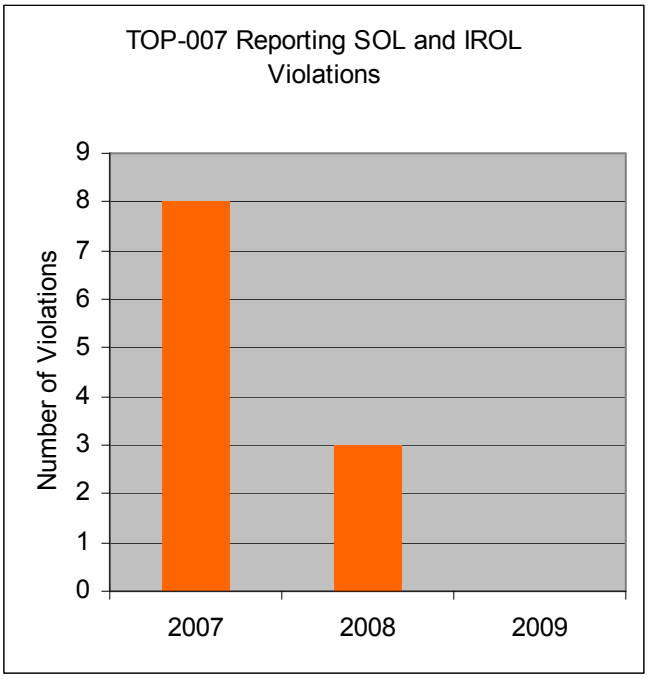
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs for R3 have been modified for clarity and consistency. The VSLs for R2, R4, and R5 have been modified to be consistent with FERC Guideline 1 while the remaining VSLs have not changed significantly over time. Although proposed for modification, the VSLs as proposed 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 1 Analysis of TOP-007 — Reporting SOL and IROL Violations

Description of Standard
TOP-007 is intended to ensure SOL and IROL violations are being reported to the Reliability Coordinator so that the Reliability Coordinator may evaluate actions being taken and direct additional corrective actions as needed.

To date, there is only one FERC-approved version of the standard.

Historical Performance
For 2007, 2008, and 2009, compliance data is charted below based on the annual number of violations:



There were eight violations in 2007, three in 2008, and none in 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established based on the severity of a limit violation. These Levels of Non-Compliance are in a non-standard format; the information below is intended to represent them in a more standardized way.

Level 1 Violation	The Transmission Operator did not inform the Reliability Coordinator of an IROL or an SOL that has become an IROL because of changed system conditions, and the actions they are taking to return the system to within limits OR The Transmission Operator did not take corrective actions as directed by the Reliability Coordinator to return the system to within the IROL within 30

	minutes. (See Table 1-TOP-007-0 below.)
Level 2 Violation	The Transmission Operator did not take corrective actions as directed by the Reliability Coordinator to return the system to within the IROL within 30 minutes. (See Table 1-TOP-007-0 below.)
Level 3 Violation	The limit violation was reported to the Reliability Coordinator, who did not provide appropriate direction to the Transmission Operator, resulting in an IROL violation in excess of 30 minutes duration. OR The Transmission Operator did not take corrective actions as directed by the Reliability Coordinator to return the system to within the IROL within 30 minutes. (See Table 1-TOP-007-0 below.)
Level 4 Violation	The Transmission Operator did not take corrective actions as directed by the Reliability Coordinator to return the system to within the IROL within 30 minutes. (See Table 1-TOP-007-0 below.)

Table 1-TOP-007-0 IROL and SOL Reporting Levels of Non-Compliance

Percentage by which IROL or SOL that has become an IROL is exceeded*	Limit exceeded for more than 30 minutes, up to 35 minutes.	Limit exceeded for more than 35 minutes, up to 40 minutes.	Limit exceeded for more than 40 minutes, up to 45 minutes.	Limit exceeded for more than 45 minutes.
Greater than 0%, up to and including 5%	Level 1	Level 2	Level 2	Level 3
Greater than 5%, up to and including 10%	Level 2	Level 2	Level 3	Level 3
Greater than 10%, up to and including 15%	Level 2	Level 3	Level 3	Level 4
Greater than 15%, up to and including 20%	Level 3	Level 3	Level 4	Level 4
Greater than 20%, up to and including 25%	Level 3	Level 4	Level 4	Level 4
Greater than 25%	Level 4	Level 4	Level 4	Level 4

*Percentage used in the left column is the flow measured at the end of the time period (30, 35, 40, or 45 minutes).

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1, R2, and R4. Additional detail and VSLs for Requirement R3 were added as well to address areas that were not assigned Levels of Non-Compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R2 to be consistent with FERC Guideline 2.
- Modified the VSLs for Requirements R3 and R4 for clarity and consistency with other standards and VSLs.

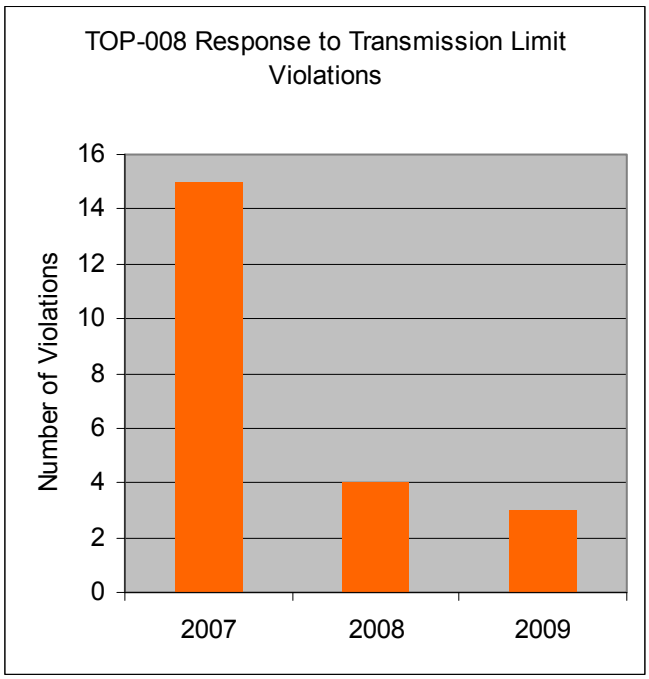
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified to be consistent with FERC Guidelines and for clarity and consistency. However, the VSLs have not changed significantly over time. Although proposed for modification, the 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 1 Analysis of TOP-008 — Response to Transmission Limit Violations

Description of Standard
TOP-008 is intended to ensure Transmission Operators take actions to mitigate SOL and IROL violations.

To date, there have been two versions of the standard — TOP-008-0 and TOP-008-1.

Historical Performance
For 2007, 2008, and 2009, compliance data is charted below based on the annual number of violations:



There were fifteen violations in 2007, four in 2008, and three in 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R1, R3, and R4.

Level 1 Violation	N/A
Level 2 Violation	• Disconnected an overloaded facility as specified in R3 but did not notify its Reliability Coordinator and all neighboring Transmission Operators impacted by the disconnection prior to switching, or immediately thereafter.
Level 3 Violation	N/A
Level 4 Violation	• Did not take immediate steps to relieve an IROL or SOL violation in accordance with R1. • Did not disconnect an overloaded facility as specified in R3. • Does not have sufficient information and analysis tools to determine the cause(s) of SOL violations. (R4 Part 1) • Did not use the results of analyses to immediately mitigate an SOL violation. (R4 Part 3)

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1, R3, and R4. However, the VSLs for R4 were split into multiple VSLs, potentially lowering the thresholds of non-compliance. Additional detail and a new set of VSLs for Requirement R2 were added to address areas that were not previously assigned Levels of Non-Compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R2 and R3 for clarity and consistency with other standards and VSLs.
- Per FERC Guideline 1, modified the VSLs for Requirement R4 to be consistent with the Levels of Non-Compliance.

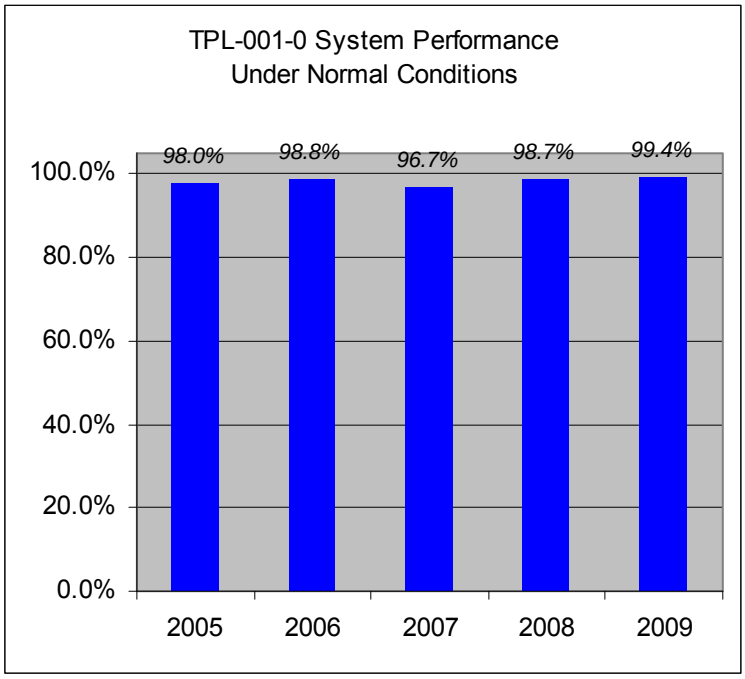
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified only to be consistent with FERC Guidelines and for clarity and consistency. VSLs for R2 and R3 in particular are more stringent in this proposal than in those approved in the June, 2008 VSL Order, and the VSLs for R4 have been made consistent with the Levels of Non-Compliance. 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 1 Analysis of TPL-001 — System Performance Under Normal Conditions

Description of Standard
TPL-001 requires periodic assessments and simulations to ensure that the bulk power system is planned such that it can be operated under normal conditions and that all demand is supplied, as well as all firm transmission services supported.

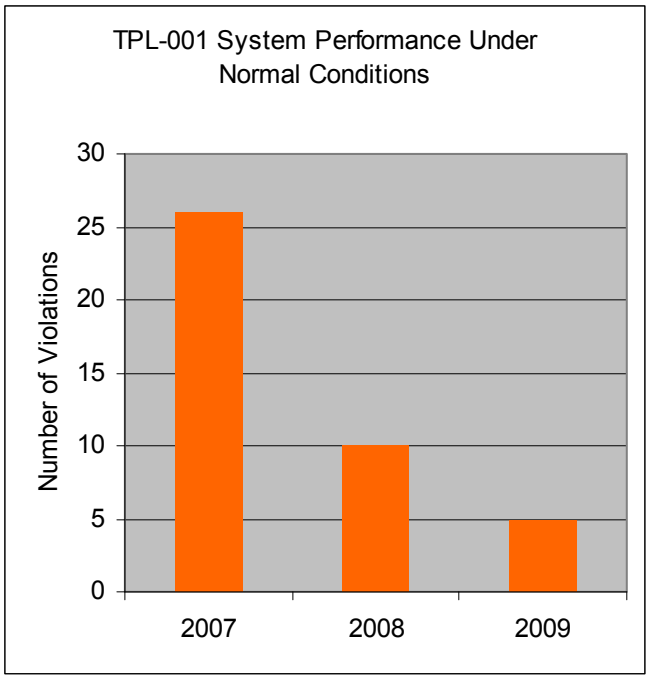
To date, there is only one FERC-approved version of the standard.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is charted below based on the annual percentage of compliant entities.



TPL-001 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically below based on the annual number of violations:



There were several violations in 2007, ten in 2008, and five in 2009.

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established based on whether or not an assessment and any associated corrective plans were available — one for the longer-term planning horizon, and one for the near-term planning horizon. These were the only two Levels of Non-Compliance defined.

Level 1 Violation	Not applicable.
Level 2 Violation	A valid assessment and corrective plan for the longer-term planning horizon is not available.
Level 3 Violation	Not applicable.
Level 4 Violation	A valid assessment and corrective plan for the near-term planning horizon is not available.

TPL-001-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs included the limited criteria from the Levels of Non-Compliance but provided significantly more detail, adding multiple specific VSLs for each requirement. However, the VSLs for R1.2 (which aligns with the Levels of Non-Compliance above) were split across the Lower, Moderate, and Severe VSLs, potentially lowering the thresholds of non-compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLS for Requirement R1 to be consistent with FERC Guideline 3.
- Per FERC Guideline 1, modified the VSLs for R1 to be consistent with the Levels of Non-Compliance.
- VSLs for components of requirements R1 and R2 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.
- Modified the VSLs for Requirements R2 and R3 for clarity and consistency with other standards and VSLs.

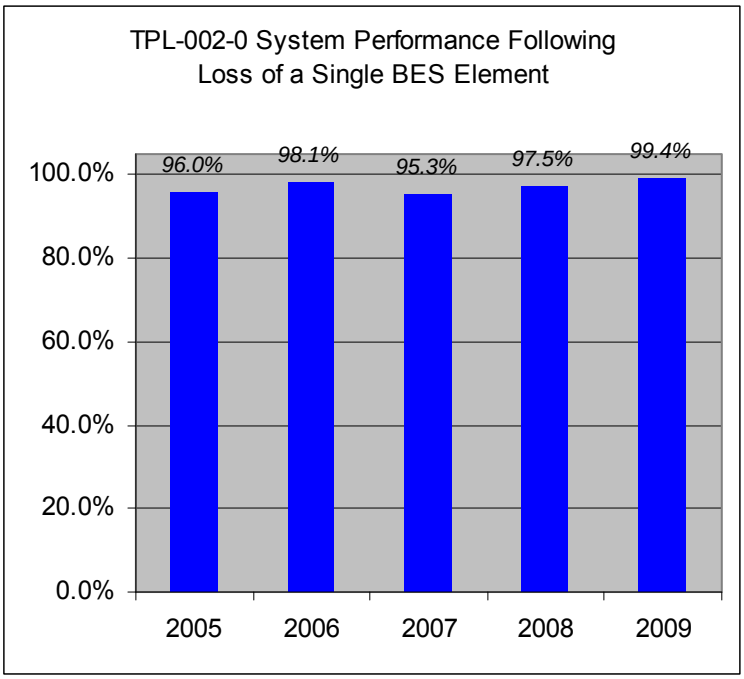
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were in many areas more stringent than those defined in the original Levels of Non-Compliance, but with regard to R1.2, less stringent. For this reason, the VSLs for Requirement R1 have been modified to be consistent with the levels used prior to June 2008. NERC believes that these VSLs as proposed do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of TPL-002 — System Performance Following Loss of a Single BES Element

Description of Standard
TPL-002 requires periodic assessments and simulations to ensure that the bulk power system is planned such that it can be operated under single-contingency scenarios and that all demand is supplied, as well as all firm transmission services supported.

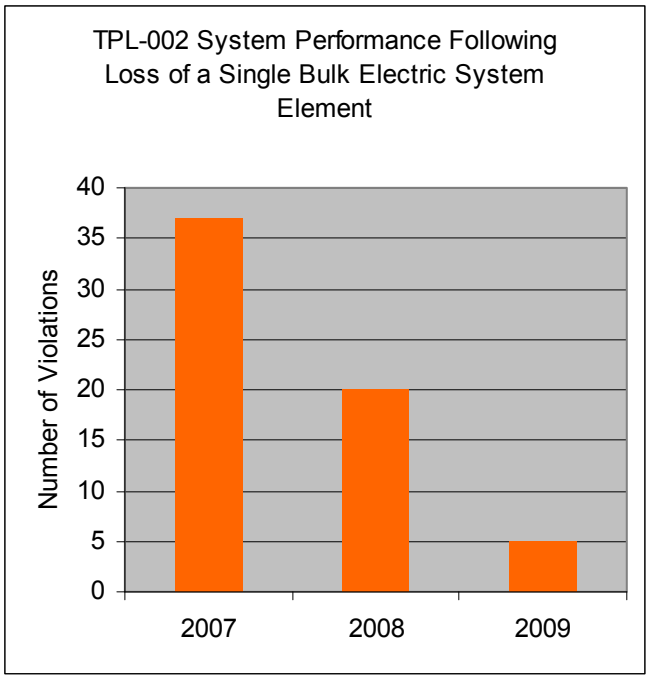
To date, there is only one FERC-approved version of the standard.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is presented graphically below based on the annual percentage of compliant entities.



TPL-002 Historical Performance

For 2007, 2008, and 2009, the data is charted below based on the annual number of violations:



There were several violations in 2007, twenty in 2008, and five in 2009.

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established based on whether or not an assessment and any associated corrective plans were available — one for the longer-term planning horizon, and one for the near-term planning horizon. These were the only two Levels of Non-Compliance defined.

Level 1 Violation	Not applicable.
Level 2 Violation	A valid assessment and corrective plan for the longer-term planning horizon is not available.
Level 3 Violation	Not applicable.
Level 4 Violation	A valid assessment and corrective plan for the near-term planning horizon is not available.

TPL-002-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs included the limited measures from the Levels of Non-Compliance but provided significantly more detail, adding multiple specific VSLs for each requirement. However, the VSLs for R1.2 (which aligns with the Levels of Non-Compliance above) were split across the Lower, Moderate, and Severe VSLs, potentially lowering the thresholds of non-compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLS for Requirement R1 to be consistent with FERC Guideline 3.
- Per FERC Guideline 1, modified the VSLs for R1 to be consistent with the Levels of Non-Compliance.
- VSLs for components of requirements R1 and R2 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.
- Modified the VSLs for Requirement R3 for clarity and consistency with other standards and VSLs.

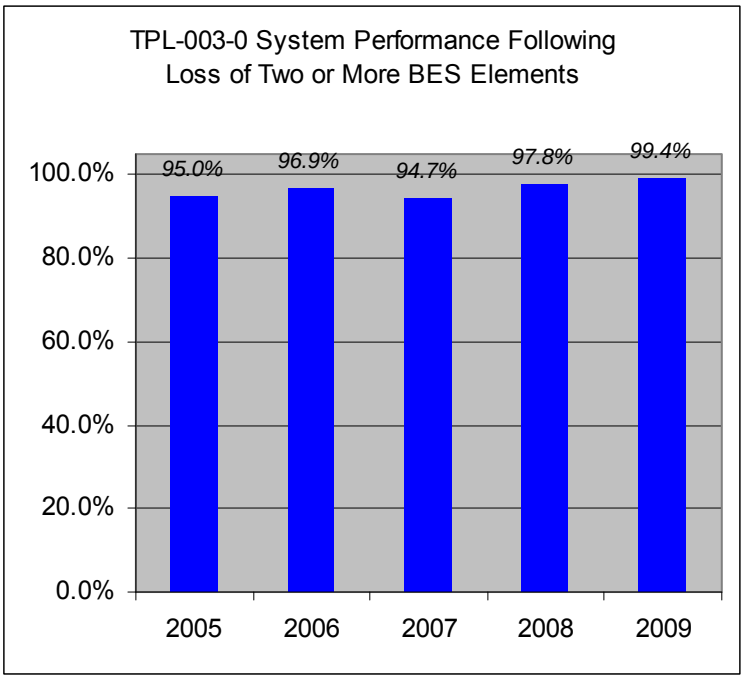
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were in many areas more stringent than those defined in the original Levels of Non-Compliance, but with regard to R1.2, less stringent. , Accordingly, the VSLs for Requirement R1 have been modified to be consistent with the levels used prior to June 2008. NERC believes that these VSLs as proposed do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of TPL-003 — System Performance Following Loss of a Two or More BES Elements

Description of Standard
TPL-003 requires periodic assessments and simulations to ensure that the bulk power system is planned such that it can be operated under multiple-contingency scenarios and that all demand is supplied, as well as all firm transmission services supported.

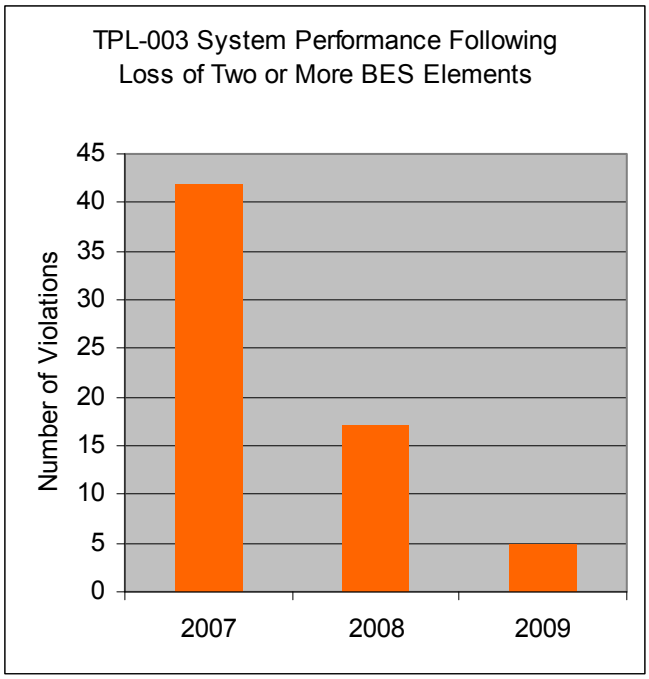
To date, there is only one FERC-approved version of the standard.

Historical Performance
NERC has compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is presented graphically based on the annual percentage of compliant entities:



TPL-003 Historical Performance

For 2007, 2008, and 2009, the data is charted below based on the annual number of violations:



There were several violations on 2007, seventeen in 2008, and five in 2009.

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established based on whether or not an assessment and any associated corrective plans were available — one for the longer-term planning horizon, and one for the near-term planning horizon. These were the only two Levels of Non-Compliance defined.

Level 1 Violation	Not applicable.
Level 2 Violation	A valid assessment and corrective plan for the longer-term planning horizon is not available.
Level 3 Violation	Not applicable.
Level 4 Violation	A valid assessment and corrective plan for the near-term planning horizon is not available.

TPL-003-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs included the limited measures from the Levels of Non-Compliance but provided significantly more detail, adding multiple specific VSLs for each requirement. However, the VSLs for R1.2 (which aligns with the Levels of Non-Compliance above) were split across the Lower, Moderate, and Severe VSLs, potentially lowering the thresholds of non-compliance.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- VSLs for components of requirements R1 and R2 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.
- Per FERC Guideline 1, modified the VSLs for R1 to be consistent with the Levels of Non-Compliance.
- Modified the VSLs for requirements R2 and R3 for clarity and consistency with other standards and VSLs.

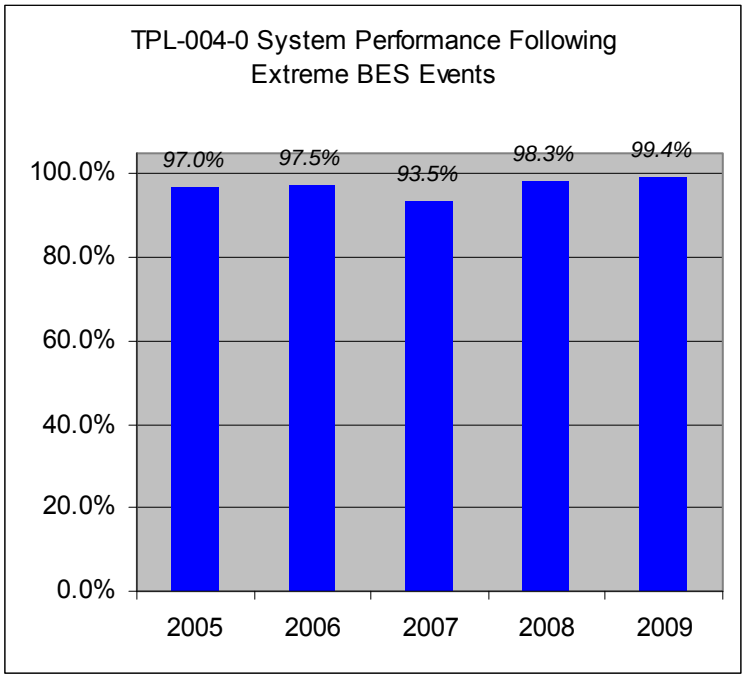
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were in many areas more stringent than those defined in the original Levels of Non-Compliance, but with regard to R1.2, less stringent. , Accordingly, the VSLs for Requirement R1 have been modified to be consistent with the levels used prior to June 2008. NERC believes that these VSLs as proposed do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of TPL-004 — System Performance Following Extreme BES Events

Description of Standard
TPL-003 requires periodic assessments and simulations to ensure that the performance of the bulk power system is evaluated against various extreme scenarios.

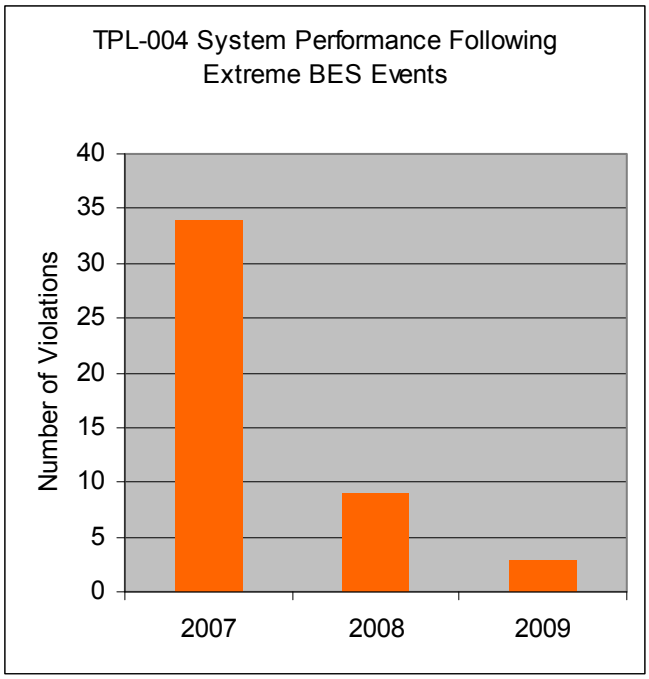
To date, there is only one FERC-approved version of the standard.

Historical Performance
NERC has reviewed compliance data for this standard for 2005, 2006, 2007, 2008, and 2009. This data is charted below based on the annual percentage of compliant entities.



TPL-004 Historical Performance

For 2007, 2008, and 2009, the data is presented graphically below based on the annual number of violations:



There were several violations in 2007, nine in 2008, and three in 2009.

Past Compliance Criteria

In Version 0 of this standard, Levels of Non-Compliance were established based on whether or not an assessment of performance during extreme scenarios for the near-term planning horizon was available. This was the first, and only, Level of Non-Compliance defined.

Level 1 Violation	A valid assessment, as defined above, for the near-term planning horizon is not available.
Level 2 Violation	Not applicable.
Level 3 Violation	Not applicable.
Level 4 Violation	Not applicable.

TPL-004-0 Levels of Non-Compliance

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs included the limited criteria from the Levels of Non-Compliance but provided significantly more detail, adding multiple specific VSLs for each requirement. In other words, the original criteria were retained, and several more added.

Proposed Compliance Criteria Following FERC Guideline Review

NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLS for Requirement R1 to be consistent with FERC Guideline 3.
- VSLs for components of Requirement R1 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirement.
- Modified the VSLs for Requirement R2 for clarity and consistency with other standards and VSLs.

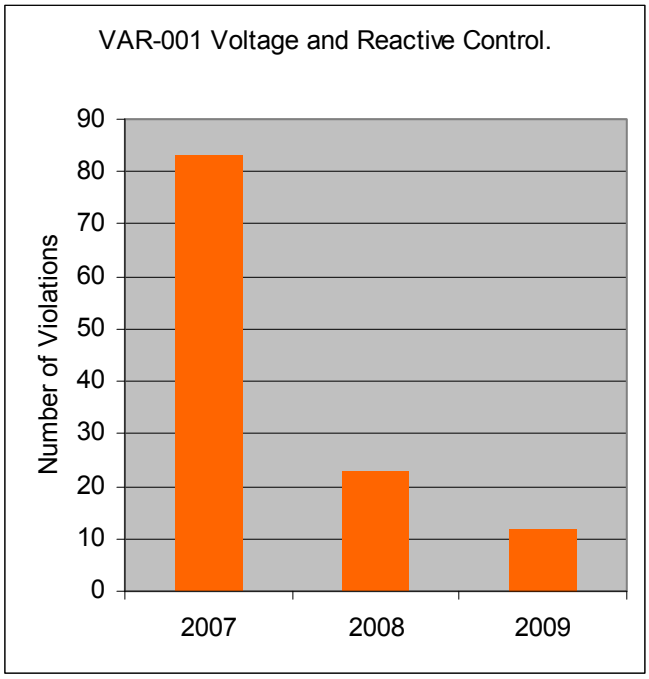
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs approved by FERC in the June 19, 2008 Order were more stringent than those defined in the original Levels of Non-Compliance. NERC believes that these VSLs do not have the effect of decreasing reliability below historic levels.

Guideline 1 Analysis of VAR-001 — Voltage and Reactive Control

Description of Standard
VAR-001 is intended to ensure that voltage levels, reactive flows, and reactive resources are monitored, controlled, and maintained within limits in real time to protect equipment and the reliable operation of the interconnection.

To date, there have been two versions of the standard — VAR-001 -0 and VAR-001-1.

Historical Performance
For 2007, 2008, and 2009, compliance data is presented graphically below based on the annual number of violations:



There were several violations in 2007, twenty-three in 2008, and twelve in 2009.

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for parts of requirements R3, R4, R6, and R11.

Level 1 Violation	• No evidence that exempt Generator Owners were notified of their exemption as specified under R3.2
Level 2 Violation	• No evidence to show that directives were issued in accordance with R6.1. • No evidence that documentation was provided to Generator Owner when a change was needed to a generating unit's step-up transformer tap in accordance with R11.
Level 3 Violation	• Voltage or Reactive Power schedules were provided for some but not all generating units as required in R4.
Level 4 Violation	• No evidence voltage or Reactive Power schedules were provided to Generator Operators as required in R4.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R3, R4, R6, and R11. Several additional VSLs were added to provide additional detail and to address requirements that were not previously assigned Levels of Non-Compliance.

On July 21, 2008, NERC filed changes to these VSLs based on directives from FERC. On November 20, 2008, FERC accepted changes to some of the VAR-001 VSLs proposed by NERC.

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs previously approved by FERC, with the following changes.

- Modified the VSLs for Requirement R4 to be consistent with FERC Guideline 3.
- Modified the VSLs for requirements R1, R2, R3, R3.1, R3.2, R5, R6, R7, R8, R9, R9.1, R10, and R11 for clarity and consistency with other standards and VSLs.

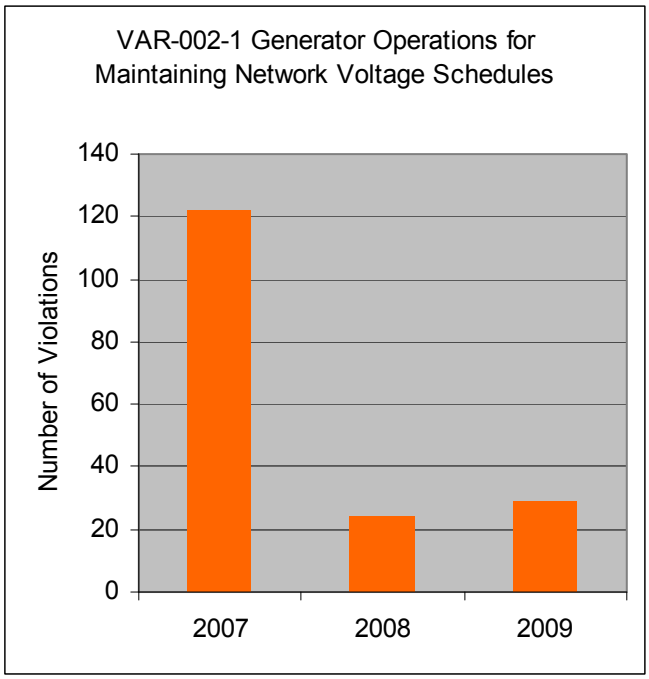
Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency.. With the exception of adding VSLs, the VSLs have not changed significantly over time. Although proposed 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 1 Analysis of VAR-002 — Generator Operations for Maintaining Network Voltage Schedules

Description of Standard
VAR-002 is intended to ensure that generators provide reactive and voltage control necessary to maintain voltage levels, reactive levels, and reactive resources within applicable facility ratings to protect equipment and support the reliable operation of the Interconnection.

To date, there is only one FERC-approved version of the standard.

Historical Performance
For 2007, 2008, and 2009, compliance data is presented graphically below based on the annual number of violations:



There were a significant number of violations in 2007, approximately one fifth that number in 2008, and 29 in 2009

Past Compliance Criteria
In Version 0 of this standard, Levels of Non-Compliance were established for requirements R1, R2, R3, R4, and R5.

Level 1 Violation	Generator Operator • One incident of failing to notify the Transmission Operator as identified in R3.1, R3.2 or R5.1. • One incident of failing to maintain a voltage or reactive power schedule (R2).
Level 2 Violation	Generator Operator • More than one but less than five incidents of failing to notify the Transmission as identified in R1, R3.1, R3.2 or R5.1. • More than one but less than five incidents of failing to maintain a voltage or reactive power schedule (R2). Generator Owner • Documentation of generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage was missing two of the data types identified in R4.1.1 through R4.1.4.
Level 3 Violation	Generator Operator • More than five but less than ten incidents of failing to notify the Transmission Operator as identified in R1, R3.1, R3.2 or R5.1. • More than five but less than ten incidents of failing to maintain a voltage or reactive power schedule (R2). Generator Owner • No documentation of generator step-up transformers and auxiliary transformers with primary voltages equal to or greater than the generator terminal voltage
Level 4 Violation	Generator Operator • Failed to comply with the Transmission Operator's directives as identified in R2. • Ten or more incidents of failing to notify the Transmission Operator as identified in R1, R3.1, R3.2 or R5.1. • Ten or more incidents of failing to maintain a voltage or reactive power schedule (R2). Generator Owner • Did not ensure generating unit step-up transformer settings were changed in compliance with the specifications provided by the Transmission Operator as identified in R5.

In the June 19, 2008 VSL Order, FERC approved a set of VSLs to supersede the Levels of Non-Compliance for this standard. Those VSLs retained the criteria used in the Level of Non-Compliance criteria and incorporated them into VSLs for requirements R1, R2, R3, R4, and R5. Several additional VSLs were added to provide additional detail and to address areas that were not previously assigned Levels of Non-Compliance.

Subsequently, on June 24, 2009, FERC approved a set of VSLs assigning binary VSLs as "Severe."

Proposed Compliance Criteria Following FERC Guideline Review
NERC proposes to retain the majority of the content of the VSLs that have been previously approved by FERC, with the following changes.

- Modified the VSLs for requirements R1, R4, and R5 to be consistent with FERC Guideline 2.
- Modified the VSLs for Requirement R2 to be consistent with FERC Guideline 3.
- Modified the VSLS for requirement R3, R4, R5, and R5.1 to be consistent with FERC Guideline 4.
- Modified the VSLs for Requirement R2 for clarity and consistency with other standards and VSLs.
- VSLs for components of requirements R2, R3, and R4 (previously referred to as sub-requirements) have been incorporated into the VSL for the main requirements.

Conclusions Regarding Proposed Compliance Criteria and Historical Performance
The VSLs included in this filing have been modified for consistency with FERC Guidelines and for clarity and consistency with NERC's approach for incorporating VSLs from sub-requirements into those of the main requirement. 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.

Exhibit E — NERC Certification

County of Mercer)
City of New Jersey)

CERTIFICATION

Gerry Adamski hereby certifies that he is Vice President and Director of Standards for the North American Electric Reliability Corporation ("NERC"); and that he is authorized to execute this certification; that he is familiar with the NERC's compliance filing in response to the Federal Energy Regulatory Commission's ("FERC") Orders directing NERC to conduct an analysis of Violation Severity Level ("VSL") assignments for specific FERC-approved Reliability Standards to determine consistency with FERC's VSL assignment Guidelines 2b, 3, and 4; that, to the best of his information, knowledge and belief, the statements and supporting documents included in this response and appended to this certification are true and correct as of the date of signing.

Gerry Adamski
Vice President and Director of Standards
North American Electric Reliability Corporation

Subscribed and sworn to before me on the 5th day of March, 2010.

Notary Public

My Commission Expires:

JULIE MORGAN
NOTARY PUBLIC OF NEW JERSEY
Commission Expires 7/9/2013