Official Comment Form for Project 2007-23 — Violation Severity Levels
Please **DO NOT** use this form. Please use the electronic comment form to submit comments on the proposed revisions to 14 sets of VSLs. Comments must be submitted by **February 18, 2011**. If you have questions please contact Mallory Huggins at mallory.huggins@nerc.net or by telephone at 609-619-1629.

### Individual Commenter Information
(Complete this page for comments from one organization or individual.)

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<th>Organization:</th>
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### NERC Region

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Group Comments (Complete this page if comments are from a group.)

Group Name: Regional Standards Committee of the NPCC
Lead Contact:
Contact Organization:
Contact Segment:
Contact Telephone:
Contact E-mail:

*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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Background Information

In its June 19, 2008 VSL Order, FERC directed NERC to review all Violation Severity Level (VSL) assignments – with the exception of those for which the Commission directed specific modification – for compliance with the following Guidelines 2b, 3, and 4 and submit a compliance filing either validating the current VSL assignments or proposing revision.

- **Guideline 2b** — VSLs should not use ambiguous terms such as "minor" or "significant" to describe noncompliant performance.
- **Guideline 3** — VSLs should be consistent with the corresponding requirement (VSLs should not expand on what is in the requirement).
- **Guideline 4** — VSLs should be based on a single violation, not on a cumulative number of violations (unless stated otherwise in the requirement).

The VSL Drafting Team (VSL DT) posted the proposed VSLs for stakeholder comment from April 1-30, 2009. The drafting team produced a redline version of each set of VSLs to show stakeholders the original set of VSLs that was balloted in 2008, the changes proposed by the VSL DT in April 2009, and additional changes made based on stakeholder comments in June 2009.

The modifications made during this process were filed with FERC on March 5, 2010. In December 2010, NERC and FERC staffs met to discuss 14 sets of VSLs in need of modification. In some cases, changes were needed for clarity, and in other cases, there was a need to modify a VSL to ensure compliance with FERC’s VSL Guidelines.

In coordination with members of the VSL DT for Project 2007-23, NERC staff made changes to ensure clarity and compliance with FERC Guidelines, and these changes have been posted here for industry review. A ballot pool from the last VSL comment period and nonbinding poll, which took place from September 27, 2010 through November 6, 2010, has been cloned to create the ballot pool for this concurrent comment period and nonbinding poll.

Included in this posting are a clean version of the affected VSLs and a redline version of the VSLs compared to the current FERC-approved VSLs. The documents have been posted for a 30-day concurrent formal comment and nonbinding poll period that will end at 8 p.m. EST on February 18, 2010. The nonbinding poll will take place during the last ten days of this period, beginning at 8 a.m. EST on February 9, 2010.

NERC staff, in coordination with the VSL Drafting Team, will consider and respond to comments and make conforming changes where necessary. The revised VSLs will be presented to the Board of Trustees for approval, and then will be filed with applicable regulatory authorities.


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1 BAL-001 through BAL-006; CIP-001; COM-001 and COM-002; FAC-001, FAC-002, FAC-003, FAC-008, FAC-009, and FAC-013; INT-001, INT-003 through INT-010; IRO-001 through IRO-006 and IRO-014 through IRO-016; MOD-006, MOD-007, MOD-010, MOD-012, and MOD-016 through MOD-021; PER-001 through PER-004; NUC-001; PRC-001, PRC-004, PRC-005, PRC-007 through PRC-011, PRC-015 through PRC-018, PRC-021, and PRC-022; TOP-001 through TOP-008; TPL-001 through TPL-004; VAR-001 and VAR-002
Official Comment Form for Project 2007-23 — Violation Severity Levels

You do not have to answer all questions. Enter all comments in Simple Text Format.

1. Do you agree with the proposed VSL(s) modifications for BAL-003-0.1b, R1? If not, please offer your suggested alternative language.
   ☑ Yes
   ☐ No
   Comments:

2. Do you agree with the proposed VSL(s) modifications for COM-001-1.1, R2? If not, please offer your suggested alternative language.
   ☐ Yes
   ☑ No
   Comments: In the Severe VSLs insert "telecommunications facilities" after "vital" to improve sentence clarity.
   The High and Severe VSLs need to be clarified. We understand "emergency telecommunications facilities and equipment not used for routine communications" to be a subset of "vital telecommunications facilities". However as written, the VSLs seem to treat these "emergency telecommunications facilities" as separate from the "vital telecommunications facilities". If these emergency telecommunications facilities and equipment ARE considered vital, we suggest removing the High VSL, and in the Severe VSL, replacing "and" before "emergency telecommunications facilities" with "including".

3. Do you agree with the proposed VSL(s) modifications for COM-002-2, R1.1? If not, please offer your suggested alternative language.
   ☐ Yes
   ☑ No
   Comments: Consistent with NERC’s VSL Guidelines applied in the previous posting, the VSL of the sub-requirement should be incorporated into the VSL of the main requirement. Suggest the stated VSLs be "OR-ed" with the corresponding VLSs of the main requirement.
   For the High VSL, replace "all" with "at least one" and make consequential changes to avoid a problem if some but not all entities were notified. The text would read "failed to notify at least one other potentially affected Balancing Authority or Transmission Operator".

4. Do you agree with the proposed VSL(s) modifications for FAC-003-1, R1.2.2.17? If not, please offer your suggested alternative language.
   ☑ Yes
   ☐ No
   Comments: Consistent with NERC’s VSL Guidelines applied in the previous posting, the VSL of the sub-requirement should be incorporated into the VSL
of the main requirement. Suggest the stated VSLs be "OR-ed" with the corresponding VLSs of the main requirement. Consistent with NERC’s VSL Guidelines applied in the previous posting, the VSL of the sub-requirement should be incorporated into the VSL of the main requirement. Suggest the stated VSLs be “OR-ed” with the corresponding VLSs of the main requirement.

5. Do you agree with the proposed VSL(s) modifications for IRO-004-1, R1? If not, please offer your suggested alternative language.

☐ Yes
☒ No

Comments: For the Severe VSL, “or” should be replaced by “OR” to make it clear that what follows is a second part to the VSL and “contingency” (following “or”) should be capitalized.

6. Do you agree with the proposed VSL(s) modifications for IRO-004-1, R3? If not, please offer your suggested alternative language.

☐ Yes
☒ No

Comments: For the Severe VSL, replace “reducing” with “reduction of”. For the Severe VSL, replace “reducing” with “reduction of”.

7. Do you agree with the proposed VSL(s) modifications for IRO-004-1, R4? If not, please offer your suggested alternative language.

☐ Yes
☒ No

Comments: For the Lower VSL we suggest replacing "provided after the required time (but not more than one hour after the required time)" with “provided up to one hour after the required time”.

For the Moderate VSL we suggest the sentence structure “more than one hour and up to (and including) two hours after the required time.”

A similar structure is suggested for the High VSL.

8. Do you agree with the proposed VSL(s) modifications for IRO-004-1, R5? If not, please offer your suggested alternative language.

☐ Yes
☒ No

Comments: For consistency in language across all VSLs of this requirement, “information” in the Moderate, High and Severe VSLs should be changed to “results”.

We also suggest a sentence structure for the Lower, Moderate and High VSLs similar to what was proposed in our response to Q7.

9. Do you agree with the proposed VSL(s) modifications for IRO-006-4.1, R3? If not, please offer your suggested alternative language.

☒ Yes
☐ No
Comments:

10. Do you agree with the proposed VSL(s) modifications for PRC-001-1, R1? If not, please offer your suggested alternative language.
☑ Yes
☐ No
Comments:

11. Do you agree with the proposed VSL(s) modifications for PRC-001-1, R3.1? If not, please offer your suggested alternative language.
☐ Yes
☑ No
Comments: Consistent with NERC’s VSL Guidelines applied in the previous posting, the VSL of the sub-requirement should be incorporated into the VSL of the main requirement. We therefore suggest the stated VSLs be “OR-ed” with the corresponding VLSs of Requirement R3.2 into a set of VSLs for the main requirement.

Also, for consistency with the other VSLs, we suggest inserting “either” after “with” for the Severe VSL.

The VSLs as proposed are not consistent with Guideline 4.

12. Do you agree with the proposed VSL(s) modifications for PRC-001-1, R3.2? If not, please offer your suggested alternative language.
☐ Yes
☑ No
Comments: Consistent with NERC’s VSL Guidelines applied in the previous posting, the VSL of the sub-requirement should be incorporated into the VSL of the main requirement. We therefore suggest the stated VSLs be “OR-ed” with the corresponding VLSs of the main requirement.

The VSLs as proposed are not consistent with Guideline 4.

13. Do you agree with the proposed VSL(s) modifications for PRC-005-1, R1? If not, please offer your suggested alternative language.
☐ Yes
☑ No
Comments: For the High VSL, replace “was” with “were”.

14. Do you agree with the proposed VSL(s) modifications for PRC-010-0, R1? If not, please offer your suggested alternative language.
☑ Yes
☐ No
Comments: