# Project 2009-03: Emergency Operations
## VRF and VSL Justifications for EOP-011-1
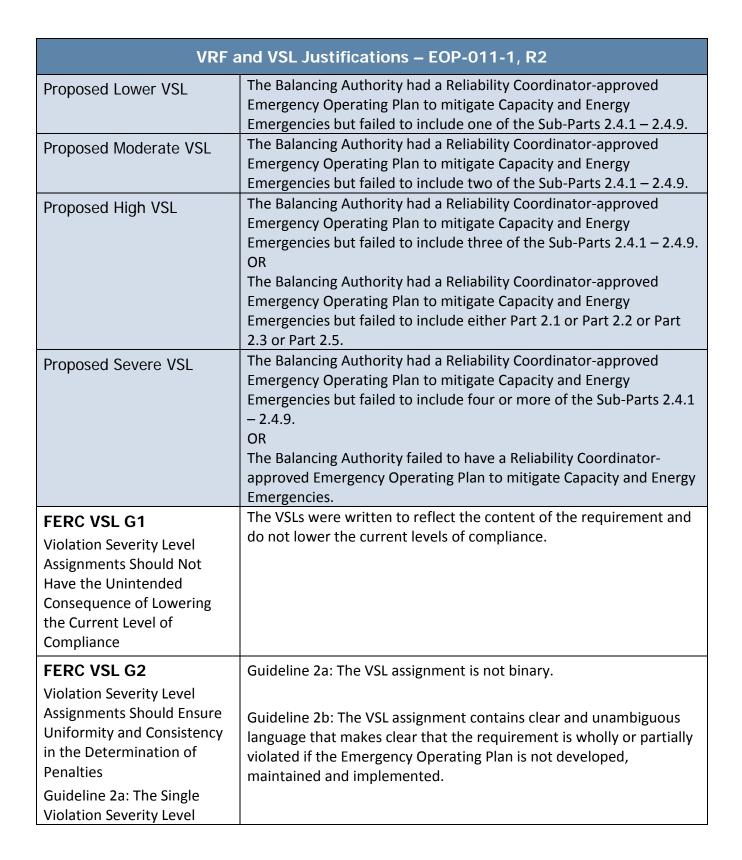
| VRF and VSL Justifications – EOP-011-1, R1 | |
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| **Proposed VRF** | High |
| NERC VRF Discussion | Developing, maintaining and implementing a Reliability Coordinator-approved Emergency Operating Plan to provide the Transmission Operator the means to mitigate operating Emergencies on the Transmission System. This is a requirement that, if violated, could directly cause or contribute to Bulk Electric System (BES) instability, separation or a Cascading sequence of failures; or could place the BES at an unacceptable risk of instability, separation or Cascading failures in Real-time. Since this requirement also is in the Operations Planning time frame, it could, if violated, under Emergency, abnormal or restorative conditions anticipated by the preparations directly cause or contribute to BES instability, separation or a Cascading sequence of failures; or could place the BES at an unacceptable risk of instability, separation or Cascading failures; or could hinder restoration to a normal condition. Since this is a Requirement in a planning time frame, a violation could, under Emergency, abnormal or restorative conditions anticipated by the preparations directly cause or contribute to BES instability, separation or a Cascading sequence of failures, or could place the BES at an unacceptable risk of instability, separation or Cascading failures; or could hinder restoration to a normal condition. This justifies a High VRF for this requirement. |
| FERC VRF G1 Discussion | *Guideline 1- Consistency w/ Blackout Report*<br>This requirement does not address any of the critical areas identified in the Final Blackout Report. |
| FERC VRF G2 Discussion | *Guideline 2- Consistency within a Reliability Standard*<br>The Requirement Parts for this Requirement provide additional detail regarding the Emergency Operating Plan and is consistent with Requirement R2. |
| FERC VRF G3 Discussion | *Guideline 3- Consistency among Reliability Standards*<br>The comparable EOP-003-2 R1, which deals with Load shedding under Emergency conditions, is assigned a High VRF. |

| VRF and VSL Justifications – EOP-011-1, R1 | |
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| FERC VRF G4 Discussion | *Guideline 4- Consistency with NERC Definitions of VRFs*<br>See "NERC VRF Discussion" above. |
| FERC VRF G5 Discussion | *Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation*<br>This guideline is not applicable, as the requirement does not co-mingle more than one obligation. |
| Proposed Lower VSL | The Transmission Operator had a Reliability Coordinator-approved Emergency Operating Plan to mitigate operating Emergencies on its Transmission System but failed to include one of the Sub-Parts 1.2.1 - 1.2.7. |
| Proposed Moderate VSL | The Transmission Operator had a Reliability Coordinator-approved Emergency Operating Plan to mitigate operating Emergencies on its Transmission System but failed to include two of the Sub-Parts 1.2.1 - 1.2.7. |
| Proposed High VSL | The Transmission Operator had a Reliability Coordinator-approved Emergency Operating Plan to mitigate operating Emergencies on its Transmission System but failed to include three of the Sub-Parts 1.2.1 - 1.2.7.<br>OR<br>The Transmission Operator had a Reliability Coordinator-approved Emergency Operating Plan to mitigate operating Emergencies on its Transmission System but failed to include either Part 1.1 or Part 1.3. |
| Proposed Severe VSL | The Transmission Operator had a Reliability Coordinator-approved Emergency Operating Plan to mitigate operating Emergencies on its Transmission System but failed to include four or more of the Sub-Parts 1.2.1 - 1.2.7.<br>OR<br>The Transmission Operator failed to have a Reliability Coordinator-approved Emergency Operating Plan to mitigate operating Emergencies on its Transmission System. |
| **FERC VSL G1**<br>Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance | The VSLs were written to reflect the content of the requirement and do not lower the current levels of compliance. |

| VRF and VSL Justifications – EOP-011-1, R1 | |
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| **FERC VSL G2**<br><br>Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties<br><br>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent<br><br>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language | Guideline 2a: The VSL assignment is not binary.<br><br>Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly or partially violated if the Emergency Operating Plan is not developed, maintained and implemented. |
| **FERC VSL G3**<br><br>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement | The language of the VSL directly mirrors the language in the corresponding requirement. |
| **FERC VSL G4**<br><br>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations | The VSL is assigned for a single instance of failing to develop, maintain and implement a Reliability Coordinator-approved Emergency Operating Plan to mitigate operating Emergencies on its Transmission System or failing to include any of the Requirement Parts. |

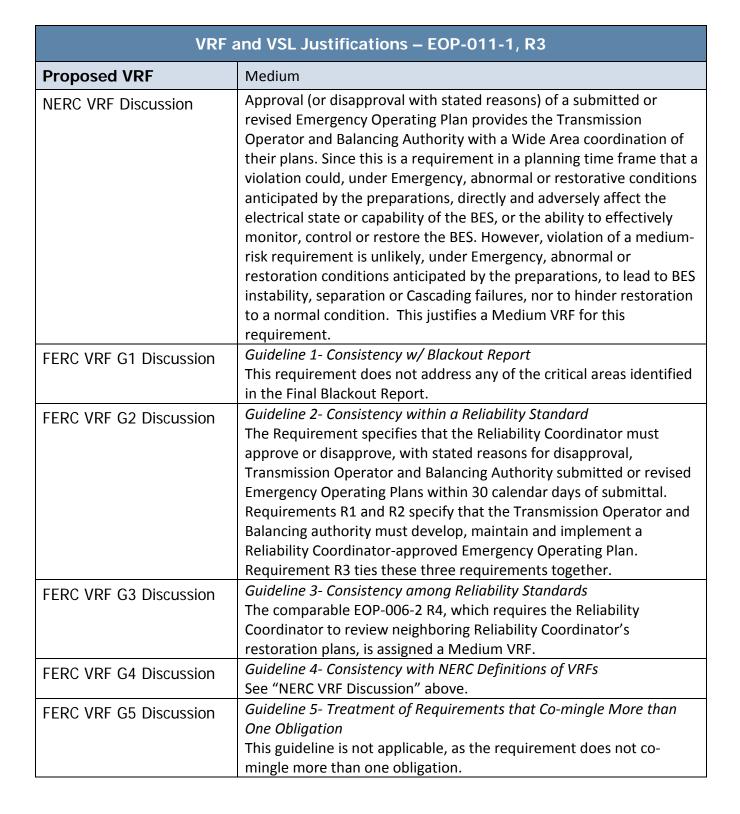| VRF and VSL Justifications – EOP-011-1, R2 | |
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| **Proposed VRF** | High |
| NERC VRF Discussion | Developing, maintaining and implementing a Reliability Coordinator-approved Emergency Operating Plan provides the Balancing Authority the means to mitigate Capacity and Energy Emergencies. This is a requirement that, if violated, could directly cause or contribute to BES instability, separation or a Cascading sequence of failures; or could place the BES at an unacceptable risk of instability, separation or Cascading failures in Real-time. Since this requirement also is in the Operations Planning time frame, it could, if violated, under emergency, abnormal or restorative conditions anticipated by the preparations directly cause or contribute to BES instability, separation or a Cascading sequence of failures, or could place the BES at an unacceptable risk of instability, separation or cascading failures; or could hinder restoration to a normal condition. Since this is a requirement in a planning time frame, a violation could, under Emergency, abnormal or restorative conditions anticipated by the preparations directly cause or contribute to BES instability, separation or a Cascading sequence of failures; or could place the BES at an unacceptable risk of instability, separation or cascading failures; or could hinder restoration to a normal condition. This justifies a High VRF for this requirement. |
| FERC VRF G1 Discussion | *Guideline 1- Consistency w/ Blackout Report*<br>This requirement does not address any of the critical areas identified in the Final Blackout Report. |
| FERC VRF G2 Discussion | *Guideline 2- Consistency within a Reliability Standard*<br>The Requirement Parts for this Requirement provide additional detail regarding the Emergency Operating Plan and is consistent with Requirement R1. |
| FERC VRF G3 Discussion | *Guideline 3- Consistency among Reliability Standards*<br>The comparable EOP-003-2 R1, which deals with Load shedding under Emergency conditions, is assigned a High VRF. |
| FERC VRF G4 Discussion | *Guideline 4- Consistency with NERC Definitions of VRFs*<br>See "NERC VRF Discussion" above. |
| FERC VRF G5 Discussion | *Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation*<br>This guideline is not applicable, as the requirement does not co-mingle more than one obligation. |

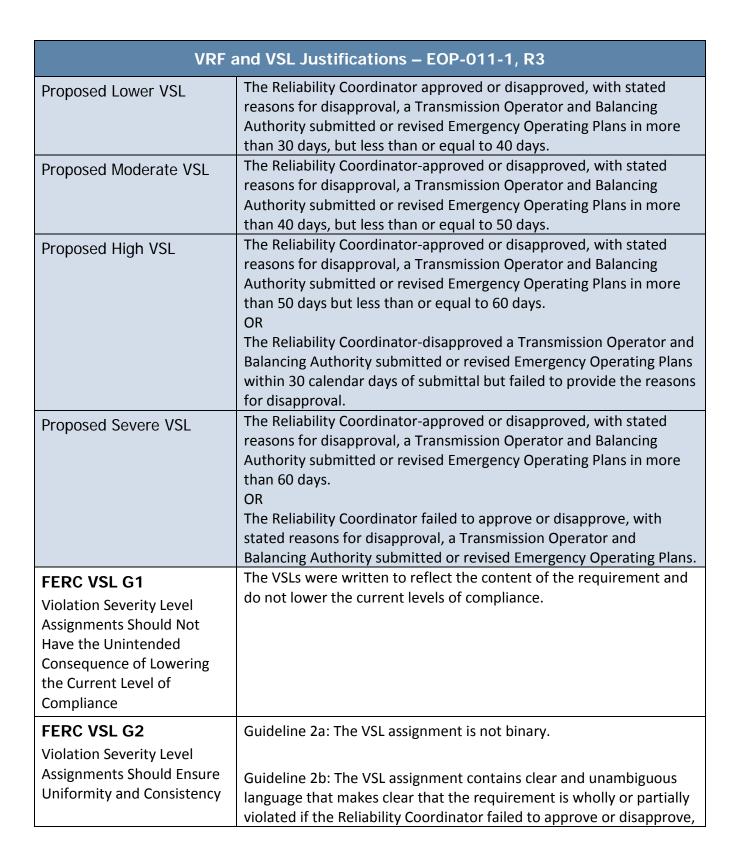| VRF and VSL Justifications – EOP-011-1, R2 | |
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| Proposed Lower VSL | The Balancing Authority had a Reliability Coordinator-approved Emergency Operating Plan to mitigate Capacity and Energy Emergencies but failed to include one of the Sub-Parts 2.4.1 – 2.4.9. |
| Proposed Moderate VSL | The Balancing Authority had a Reliability Coordinator-approved Emergency Operating Plan to mitigate Capacity and Energy Emergencies but failed to include two of the Sub-Parts 2.4.1 – 2.4.9. |
| Proposed High VSL | The Balancing Authority had a Reliability Coordinator-approved Emergency Operating Plan to mitigate Capacity and Energy Emergencies but failed to include three of the Sub-Parts 2.4.1 – 2.4.9. OR The Balancing Authority had a Reliability Coordinator-approved Emergency Operating Plan to mitigate Capacity and Energy Emergencies but failed to include either Part 2.1 or Part 2.2 or Part 2.3 or Part 2.5. |
| Proposed Severe VSL | The Balancing Authority had a Reliability Coordinator-approved Emergency Operating Plan to mitigate Capacity and Energy Emergencies but failed to include four or more of the Sub-Parts 2.4.1 – 2.4.9. OR The Balancing Authority failed to have a Reliability Coordinator-approved Emergency Operating Plan to mitigate Capacity and Energy Emergencies. |
| **FERC VSL G1** Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance | The VSLs were written to reflect the content of the requirement and do not lower the current levels of compliance. |
| **FERC VSL G2** Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level | Guideline 2a: The VSL assignment is not binary. Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly or partially violated if the Emergency Operating Plan is not developed, maintained and implemented. |

| VRF and VSL Justifications – EOP-011-1, R2 |  |
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| Assignment Category for "Binary" Requirements Is Not Consistent<br><br>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language |  |
| **FERC VSL G3**<br><br>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement | The language of the VSL directly mirrors the language in the corresponding requirement. |
| **FERC VSL G4**<br><br>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations | The VSL is assigned for a single instance of failing to develop, maintain and implement a Reliability Coordinator-approved Emergency Operating Plan to mitigate Capacity or Energy Emergencies or failing to include any of the Requirement Parts. |

| VRF and VSL Justifications – EOP-011-1, R3 | |
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| **Proposed VRF** | Medium |
| NERC VRF Discussion | Approval (or disapproval with stated reasons) of a submitted or revised Emergency Operating Plan provides the Transmission Operator and Balancing Authority with a Wide Area coordination of their plans. Since this is a requirement in a planning time frame that a violation could, under Emergency, abnormal or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state or capability of the BES, or the ability to effectively monitor, control or restore the BES. However, violation of a medium-risk requirement is unlikely, under Emergency, abnormal or restoration conditions anticipated by the preparations, to lead to BES instability, separation or Cascading failures, nor to hinder restoration to a normal condition. This justifies a Medium VRF for this requirement. |
| FERC VRF G1 Discussion | *Guideline 1- Consistency w/ Blackout Report*<br>This requirement does not address any of the critical areas identified in the Final Blackout Report. |
| FERC VRF G2 Discussion | *Guideline 2- Consistency within a Reliability Standard*<br>The Requirement specifies that the Reliability Coordinator must approve or disapprove, with stated reasons for disapproval, Transmission Operator and Balancing Authority submitted or revised Emergency Operating Plans within 30 calendar days of submittal. Requirements R1 and R2 specify that the Transmission Operator and Balancing authority must develop, maintain and implement a Reliability Coordinator-approved Emergency Operating Plan. Requirement R3 ties these three requirements together. |
| FERC VRF G3 Discussion | *Guideline 3- Consistency among Reliability Standards*<br>The comparable EOP-006-2 R4, which requires the Reliability Coordinator to review neighboring Reliability Coordinator's restoration plans, is assigned a Medium VRF. |
| FERC VRF G4 Discussion | *Guideline 4- Consistency with NERC Definitions of VRFs*<br>See "NERC VRF Discussion" above. |
| FERC VRF G5 Discussion | *Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation*<br>This guideline is not applicable, as the requirement does not co-mingle more than one obligation. |

| VRF and VSL Justifications – EOP-011-1, R3 ||
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| Proposed Lower VSL | The Reliability Coordinator approved or disapproved, with stated reasons for disapproval, a Transmission Operator and Balancing Authority submitted or revised Emergency Operating Plans in more than 30 days, but less than or equal to 40 days. |
| Proposed Moderate VSL | The Reliability Coordinator-approved or disapproved, with stated reasons for disapproval, a Transmission Operator and Balancing Authority submitted or revised Emergency Operating Plans in more than 40 days, but less than or equal to 50 days. |
| Proposed High VSL | The Reliability Coordinator-approved or disapproved, with stated reasons for disapproval, a Transmission Operator and Balancing Authority submitted or revised Emergency Operating Plans in more than 50 days but less than or equal to 60 days.<br>OR<br>The Reliability Coordinator-disapproved a Transmission Operator and Balancing Authority submitted or revised Emergency Operating Plans within 30 calendar days of submittal but failed to provide the reasons for disapproval. |
| Proposed Severe VSL | The Reliability Coordinator-approved or disapproved, with stated reasons for disapproval, a Transmission Operator and Balancing Authority submitted or revised Emergency Operating Plans in more than 60 days.<br>OR<br>The Reliability Coordinator failed to approve or disapprove, with stated reasons for disapproval, a Transmission Operator and Balancing Authority submitted or revised Emergency Operating Plans. |
| **FERC VSL G1**<br><br>Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance | The VSLs were written to reflect the content of the requirement and do not lower the current levels of compliance. |
| **FERC VSL G2**<br><br>Violation Severity Level Assignments Should Ensure Uniformity and Consistency | Guideline 2a: The VSL assignment is not binary.<br><br>Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly or partially violated if the Reliability Coordinator failed to approve or disapprove, |

| VRF and VSL Justifications – EOP-011-1, R3 | |
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| in the Determination of Penalties<br><br>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent<br><br>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language | with stated reasons for disapproval, a Transmission Operator and Balancing Authority submitted or revised Emergency Operating Plans within the specified time frame. |
| **FERC VSL G3**<br><br>Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement | The language of the VSL directly mirrors the language in the corresponding requirement. |
| **FERC VSL G4**<br><br>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations | The VSL is assigned for a single instance of failing to approve or disapprove, with stated reasons for disapproval, a Transmission Operator and Balancing Authority submitted or revised Emergency Operating Plans within the specified time frame. |

| VRF and VSL Justifications – EOP-011-1, R4 | |
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| **Proposed VRF** | High |
| NERC VRF Discussion | Notifying impacted Reliability Coordinators, Balancing Authorities and Transmission Operators of an Emergency helps other entities have proper situational awareness and allows them the opportunity to implement measures to mitigate the Emergency. This is a requirement that, if violated, could directly cause or contribute to BES instability, separation or a Cascading sequence of failures; or could place the BES at an unacceptable risk of instability, separation or Cascading failures in Real-time. This justifies a High VRF for this requirement. |
| FERC VRF G1 Discussion | *Guideline 1- Consistency w/ Blackout Report* <br> This requirement does not address any of the critical areas identified in the Final Blackout Report. |
| FERC VRF G2 Discussion | *Guideline 2- Consistency within a Reliability Standard* <br> The Requirement specifies that the Reliability Coordinator that receives an Emergency notification from a Transmission Operator or Balancing Authority shall notify, as soon as practical, other impacted Reliability Coordinators, Balancing Authorities and Transmission Operators. This relates to Requirements R1 and R2, whereby the Transmission Operator and the Balancing Authority implement their Emergency Operating Plans. These Requirements are all assigned a High VRF. |
| FERC VRF G3 Discussion | *Guideline 3- Consistency among Reliability Standards* <br> The comparable EOP-011-1 Requirements R1, Part 1.2.1 and Requirement R2, Part 2.2, are assigned a High VRF. |
| FERC VRF G4 Discussion | *Guideline 4- Consistency with NERC Definitions of VRFs* <br> See "NERC VRF Discussion" above. |
| FERC VRF G5 Discussion | *Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation* <br> This guideline is not applicable, as the requirement does not co-mingle more than one obligation. |
| Proposed Lower VSL | N/A |
| Proposed Moderate VSL | N/A |
| Proposed High VSL | The Reliability Coordinator that received an Emergency notification from a Transmission Operator or Balancing Authority and did notify |

| VRF and VSL Justifications – EOP-011-1, R4 | |
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| | other impacted Reliability Coordinators, Balancing Authorities and Transmission Operators, but did not do so as soon as practical. |
| Proposed Severe VSL | The Reliability Coordinator that received an Emergency notification from a Transmission Operator or Balancing Authority and failed to notify, as soon as practical, other impacted Reliability Coordinators, Balancing Authorities and Transmission Operators. |
| **FERC VSL G1** <br> Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance | The VSLs were written to reflect the content of the requirement and do not lower the current levels of compliance. |
| **FERC VSL G2** <br> Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <br> Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <br> Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language | Guideline 2a: The VSL assignment is not binary. <br><br> Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly or partially violated if a Reliability Coordinator that receives an Emergency notification from a Transmission Operator or Balancing Authority shall notify, as soon as practical, other impacted Reliability Coordinators, Balancing Authorities and Transmission Operators |
| **FERC VSL G3** <br> Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement | The language of the VSL directly mirrors the language in the corresponding requirement. |
| **FERC VSL G4** <br> Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A | The VSL is assigned for a single instance of failing to notifying other entities as soon as practical. |

| VRF and VSL Justifications – EOP-011-1, R4 |
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| Cumulative Number of Violations | |

| VRF and VSL Justifications – EOP-011-1, R5 | |
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| **Proposed VRF** | High |
| NERC VRF Discussion | Initiation of an Energy Emergency alert helps other entities have proper situational awareness and allows them the opportunity to implement measures to mitigate the Emergency.  This is a requirement that, if violated, could directly cause or contribute to BES instability, separation or a Cascading sequence of failures; or could place the BES at an unacceptable risk of instability, separation or Cascading failures in Real-time. This justifies a High VRF for this requirement. |
| FERC VRF G1 Discussion | *Guideline 1- Consistency w/ Blackout Report*<br>This requirement does not address any of the critical areas identified in the Final Blackout Report. |
| FERC VRF G2 Discussion | *Guideline 2- Consistency within a Reliability Standard*<br>The Requirement and Attachment 1 provide additional detail regarding the initiation of a potential or actual Energy Emergency. This links to Requirement R2, Part 2.3 regarding the criteria for an Energy Emergency alert. Both of these Requirements are assigned a High VRF |
| FERC VRF G3 Discussion | *Guideline 3- Consistency among Reliability Standards*<br>The comparable EOP-011-1 Requirement R2, Part 2.3, is assigned a High VRF. |
| FERC VRF G4 Discussion | *Guideline 4- Consistency with NERC Definitions of VRFs*<br>See "NERC VRF Discussion" above. |
| FERC VRF G5 Discussion | *Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation*<br>This guideline is not applicable, as the requirement does not co-mingle more than one obligation. |
| Proposed Lower VSL | N/A |
| Proposed Moderate VSL | The Reliability Coordinator that had a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area and failed to notify the other Reliability Coordinators, Balancing Authorities and Transmission Operators when the alert has ended. |
| Proposed High VSL | The Reliability Coordinator that had a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area and failed to initiate an Energy |

| VRF and VSL Justifications − EOP-011-1, R5 | |
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| | Emergency alert and hold conference calls between Reliability Coordinators as necessary to communicate System conditions. |
| Proposed Severe VSL | The Reliability Coordinator that had a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area failed to initiate an Energy Emergency alert and notify all other Reliability Coordinators of the situation via the Reliability Coordinator Information System (RCIS).<br>OR<br>The Reliability Coordinator that had a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area failed to initiate an Energy Emergency alert and notify all Balancing Authorities and Transmission Operators in its reliability area. |
| **FERC VSL G1**<br><br>Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance | The VSLs were written to reflect the content of the requirement and do not lower the current levels of compliance. |
| **FERC VSL G2**<br><br>Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties<br>Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent<br>Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language | Guideline 2a: The VSL assignment is not binary.<br><br>Guideline 2b: The VSL assignment contains clear and unambiguous language that makes clear that the requirement is wholly or partially violated if a Reliability Coordinator that has a Balancing Authority or Load-Serving Entity experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area and fails to initiate a an NERC Energy Emergency alert, as detailed in Attachment 1. |
| **FERC VSL G3**<br><br>Violation Severity Level Assignment Should Be | The language of the VSL directly mirrors the language in the corresponding requirement. |

| VRF and VSL Justifications — EOP-011-1, R5 | |
|---|---|
| Consistent with the Corresponding Requirement | |
| **FERC VSL G4**<br><br>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations | The VSL is assigned for a single instance of a Reliability Coordinator that has a Balancing Authority or Load-Serving Entity experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area and fails to initiate a an NERC Energy Emergency alert, as detailed in Attachment 1. |