

Violation Risk Factor and Violation Severity Level Justifications

Project 2015-08 Emergency Operations

This document provides the standard drafting team's (SDT's) justification for assignment of Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) for each requirement in EOP-005-3 – System Restoration from Blackstart Resources. Each requirement is assigned a VRF and a VSL. These elements support the determination of an initial value range for the Base Penalty Amount regarding violations of requirements in FERC-approved Reliability Standards, as defined in the Electric Reliability Organizations (ERO) Sanction Guidelines. The SDT applied the following NERC criteria and FERC Guidelines when developing the VRFs and VSLs for the requirements.

NERC Criteria for Violation Risk Factors

High Risk Requirement

A requirement that, if violated, could directly cause or contribute to Bulk Electric System instability, separation, or a cascading sequence of failures, or could place the Bulk Electric System at an unacceptable risk of instability, separation, or cascading failures; or, a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to Bulk Electric System instability, separation, or a cascading sequence of failures, or could place the Bulk Electric System at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition.

Medium Risk Requirement

A requirement that, if violated, could directly affect the electrical state or the capability of the Bulk Electric System, or the ability to effectively monitor and control the Bulk Electric System. However, violation of a medium risk requirement is unlikely to lead to Bulk Electric System instability, separation, or cascading failures; or, a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor, control, or restore the Bulk Electric System. However, violation of a medium risk requirement is unlikely, under emergency, abnormal, or restoration conditions anticipated by the preparations, to lead to Bulk Electric System instability, separation, or cascading failures, nor to hinder restoration to a normal condition.

Lower Risk Requirement

A requirement that is administrative in nature and a requirement that, if violated, would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor and control the Bulk Electric System; or, a requirement that is administrative in nature and a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor, control, or restore the Bulk Electric System.

FERC Guidelines for Violation Risk Factors

Guideline (1) – Consistency with the Conclusions of the Final Blackout Report

FERC seeks to ensure that VRFs assigned to Requirements of Reliability Standards in these identified areas appropriately reflect their historical critical impact on the reliability of the Bulk-Power System. In the VSL Order, FERC listed critical areas (from the Final Blackout Report) where violations could severely affect the reliability of the Bulk-Power System:

- Emergency operations
- Vegetation management
- Operator personnel training
- Protection systems and their coordination
- Operating tools and backup facilities
- Reactive power and voltage control
- System modeling and data exchange
- Communication protocol and facilities
- Requirements to determine equipment ratings
- Synchronized data recorders
- Clearer criteria for operationally critical facilities
- Appropriate use of transmission loading relief.

Guideline (2) – Consistency within a Reliability Standard

FERC expects a rational connection between the sub-Requirement VRF assignments and the main Requirement VRF assignment.

Guideline (3) – Consistency among Reliability Standards

FERC expects the assignment of VRFs corresponding to Requirements that address similar reliability goals in different Reliability Standards would be treated comparably.

Guideline (4) – Consistency with NERC’s Definition of the Violation Risk Factor Level

Guideline (4) was developed to evaluate whether the assignment of a particular VRF level conforms to NERC’s definition of that risk level.

Guideline (5) – Treatment of Requirements that Co-mingle More Than One Obligation

Where a single Requirement co-mingles a higher risk reliability objective and a lesser risk reliability objective, the VRF assignment for such Requirements must not be watered down to reflect the lower risk level associated with the less important objective of the Reliability Standard.

NERC Criteria for Violation Severity Levels

VSLs define the degree to which compliance with a requirement was not achieved. Each requirement must have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple “degrees” of noncompliant performance and may have only one, two, or three VSLs.

VSLs should be based on NERC’s overarching criteria shown in the table below:

Lower VSL	Moderate VSL	High VSL	Severe VSL
The performance or product measured almost meets the full intent of the requirement.	The performance or product measured meets the majority of the intent of the requirement.	The performance or product measured does not meet the majority of the intent of the requirement, but does meet some of the intent.	The performance or product measured does not substantively meet the intent of the requirement.

FERC Order of Violation Severity Levels

The FERC VSL guidelines are presented below, followed by an analysis of whether the VSLs proposed for each requirement in the standard meet the FERC Guidelines for assessing VSLs:

Guideline (1) – Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance

Compare the VSLs to any prior levels of non-compliance and avoid significant changes that may encourage a lower level of compliance than was required when levels of non-compliance were used.

Guideline (2) – Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties

A violation of a “binary” type requirement must be a “Severe” VSL.

Do not use ambiguous terms such as “minor” and “significant” to describe noncompliant performance.

Guideline (3) – Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement

VSLs should not expand on what is required in the requirement.

Guideline (4) – Violation Severity Level Assignment Should Be Based on A Single Violation, Not on a Cumulative Number of Violations

Unless otherwise stated in the requirement, each instance of non-compliance with a requirement is a separate violation. Section 4 of the Sanction Guidelines states that assessing penalties on a per violation per day basis is the “default” for penalty calculations.

VRF Justifications for EOP-005-3, R1	
Proposed VRF	High
NERC VRF Discussion	R1 is a requirement in an Operations Planning and a Real-time Operations time frame that, if violated, could directly prevent restoration to normal operations, cause or contribute to bulk electric system instability, separation, or a cascading sequence of failures, or could place the bulk electric system at an unacceptable risk of instability, separation, or cascading failures.
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report R1 requires Transmission Operator to develop, maintain and implement a restoration plan that is consistent with FERC guideline G1 regarding Emergency Operations.
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard The requirement has parts that are of equal importance and only one VRF was assigned so there is no conflict.
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards This requirement calls for development, maintenance and implementation of a restoration plan. This is similar to EOP-005-2, Requirement R1 which also places similar requirements of the Reliability Coordinator and is assigned a High VRF.
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs Failure to develop and implement a restoration plan could directly affect the electrical state or capability of the BES, or the ability to effectively monitor and control the BES. Violation of the requirement could lead to bulk electric system instability, separation, or cascading failures. The VRF for this requirement is “High” which is consistent with NERC guidelines for similar requirements.

VRF Justifications for EOP-005-3, R1

Proposed VRF	High
FERC VRF G5 Discussion	<p>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</p> <p>R1 contains only one objective which is to develop, maintain and implement a restoration plan. Since the requirement has only one objective, only one VRF was assigned.</p>

VSLs for EOP-005-3, R1

Lower	Moderate	High	Severe
The Transmission Operator has an approved plan, but failed to comply with one of the requirement parts within Requirement R1.	The Transmission Operator has an approved plan, but failed to comply with two of the requirement parts within Requirement R1.	The Transmission Operator has an approved plan, but failed to comply with three or more of the requirement parts within Requirement R1.	<p>The Transmission Operator does not have an approved restoration plan.</p> <p>OR</p> <p>The Transmission Operator has an approved restoration plan, but failed to implement the applicable requirement parts within Requirement R1.</p>

VSL Justifications for EOP-005-3, R1

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with restoration plans similar to EOP-005-2. The VSLs were revised slightly by replacing “subrequirement” with “requirement part” and adding a Severe VSL regarding the failure to implement the restoration plan. The VSLs for this requirement meet or exceed the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment for R1 is not binary.</p> <p>Guideline 2b: The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

VSL Justifications for EOP-005-3, R1

<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>

VRF Justifications for EOP-005-3, R2	
Proposed VRF	Medium
NERC VRF Discussion	R2 is a requirement in an Operations Planning time frame that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report R2 requires the Transmission Operator to distribute to entities identified in its approved restoration plan with description of any changes to their roles and specific tasks and is administrative in nature. A violation of this requirement has been assigned a Medium VRF, consistent with FERC guideline G1 regarding Emergency Operations.
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard The requirement has does not contain parts and only one VRF was assigned so there is no conflict.
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards This requirement calls for description of changes distribution of a restoration plan. This is a slight revision replacing “implementation date” to “effective date” requirement (EOP-005-2, Requirement R2) that is assigned a Medium VRF.
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs Failure to distribute changes of a restoration plan would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.
FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation R2 contains only one objective, which is to distribute changes of a restoration plan. Since the requirement has only one objective, only one VRF was assigned.

VSLs for EOP-005-3, R2			
Lower	Moderate	High	Severe
<p>The Transmission Operator failed to provide one of the entities identified in its approved restoration plan with a description of any changes to their roles and specific tasks prior to the effective date of the plan.</p>	<p>The Transmission Operator failed to provide two of the entities identified in its approved restoration plan with a description of any changes to their roles and specific tasks prior to the effective date of the plan.</p>	<p>The Transmission Operator failed to provide three of the entities identified in its approved restoration plan with a description of any changes to their roles and specific tasks prior to the effective date of the plan.</p>	<p>The Transmission Operator failed to provide four or more of the entities identified in its approved restoration plan with a description of any changes to their roles and specific tasks prior to the effective date of the plan.</p> <p>OR</p> <p>Transmission Operator failed to provide at least half of the entities identified in its approved restoration plan with a description of any changes to their roles and specific tasks prior to the effective date.</p>

VSL Justifications for EOP-005-3, R2

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with restoration plans similar to EOP-005-2. The VSLs were revised slightly by replacing “implementation” with “effective” and adding a Severe VSL regarding the failure to provide at least half of the entities identified in its approved restoration plan with a description of any changes to their roles and specific tasks prior to the effective date. The VSLs for this requirement meet or exceed the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment for R2 is not binary.</p> <p>Guideline 2b: The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

VSL Justifications for EOP-005-3, R2

<p>FERC VSL G4</p> <p>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5</p> <p>Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6</p> <p>VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>

VRF Justifications for EOP-005-3, R3	
Proposed VRF	Medium
NERC VRF Discussion	R3 is a requirement in an Operations Planning time frame that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report R3 requires the Transmission Operator to review its restoration plan within 15 calendar months of the last review. A violation of this requirement has been assigned a Medium VRF because, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system This is consistent with FERC guideline G1 regarding Emergency Operations.
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard The requirement has does not contain parts and only one VRF was assigned so there is no conflict.
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards This requirement calls for review of a restoration plan. This is a revised requirement (EOP-005-2, Requirement R3) that is assigned a Medium VRF.
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs Failure to review a restoration plan would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.
FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation R3 contains only one objective, which is to review the restoration plan. Since the requirement has only one objective, only one VRF was assigned.

VSLs for EOP-005-3, R3

Lower	Moderate	High	Severe
<p>The Transmission Operator submitted the reviewed restoration plan within 30 calendar days after the mutually-agreed, predetermined schedule.</p>	<p>The Transmission Operator submitted the reviewed restoration plan more than 30 and less than or equal to 60 calendar days after the mutually-agreed, predetermined schedule.</p>	<p>The Transmission Operator submitted the reviewed restoration plan more than 60 and less than or equal to 90 calendar days after the mutually-agreed, predetermined schedule.</p>	<p>The Transmission Operator submitted the reviewed restoration plan more than 90 calendar days after the mutually-agreed, predetermined schedule.</p>

VSL Justifications for EOP-005-3, R3

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with restoration plans similar to EOP-005-2. The VSLs for this requirement meet or exceed the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R3 is binary and assigned at the Severe level.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

VSL Justifications for EOP-005-3, R3

<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>

VRF Justifications for EOP-005-3, R4	
Proposed VRF	Medium
NERC VRF Discussion	R4 is a requirement in an Operations Planning time frame that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report R4 requires the Transmission Operator to update its restoration plan to reflect System modifications and submit it to its Reliability Coordinator for approval. A violation of this requirement has been assigned a Medium VRF because, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system This is consistent with FERC guideline G1 regarding Emergency Operations.
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard The requirement contains two parts regarding unplanned and planned System modifications timelines and only one VRF was assigned so there is no conflict.
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards This requirement calls for an update of its restoration plan and submission for Reliability Coordinator approval to reflect System modifications. This is a revised requirement (EOP-005-2, Requirement R4) that is assigned a Medium VRF.
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs Failure to update a restoration plan would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.
FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation

VRF Justifications for EOP-005-3, R4

Proposed VRF	Medium
	R4 contains only one objective, which is to update its restoration plan and submit for Reliability Coordinator approval to reflect System modifications. Since the requirement has only one objective, only one VRF was assigned.

VSLs for EOP-005-3, R4

Lower	Moderate	High	Severe
The Transmission Operator failed to submit its revised restoration plan to its Reliability Coordinator within 90 calendar days of an unplanned permanent System BES modification.	The Transmission Operator submitted its revised restoration plan to its Reliability Coordinator between 91 calendar days and 120 calendar days of an unplanned permanent System BES modification.	The Transmission Operator submitted its revised restoration plan to its Reliability Coordinator between 121 calendar days and 150 calendar days of an unplanned permanent System BES modification.	The Transmission Operator has failed to submit its revised restoration plan to its Reliability Coordinator within 150 calendar days of an unplanned permanent System BES modification. OR The Transmission Operator failed to submit its revised restoration plan to its Reliability Coordinator prior to a planned permanent BES modification.

VSL Justifications for EOP-005-3, R4

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with restoration plans similar to EOP-005-2. The VSLs for this requirement meet or exceed the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R4 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

VSL Justifications for EOP-005-3, R4

<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>

VRF Justifications for EOP-005-3, R5

Proposed VRF	Lower
NERC VRF Discussion	R5 is a requirement in an Operations Planning time frame that is administrative in nature and a requirement that, if violated, would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.
FERC VRF G1 Discussion	<p>Guideline 1- Consistency w/ Blackout Report</p> <p>R5 requires the Transmission Operator to have a copy of its latest Reliability Coordinator approved restoration plan in its primary and backup control rooms. A violation of this requirement has been assigned a Lower VRF because, if violated, would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. This is consistent with FERC guideline G1 regarding Emergency Operations.</p>
FERC VRF G2 Discussion	<p>Guideline 2- Consistency within a Reliability Standard</p> <p>The requirement contains a single part regarding coordination and compatibility of the plans and only one VRF was assigned so there is no conflict.</p>
FERC VRF G3 Discussion	<p>Guideline 3- Consistency among Reliability Standards</p> <p>This requirement calls for having its Reliability Coordinator approved restoration plan within its primary and backup control rooms. This is a simply revised requirement (EOP-005-2, Requirement R5) that is assigned a Lower VRF.</p>
FERC VRF G4 Discussion	<p>Guideline 4- Consistency with NERC Definitions of VRFs</p> <p>Failure to have a restoration plan within primary and backup control rooms would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.</p>
FERC VRF G5 Discussion	<p>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</p> <p>R5 contains only one objective, which is to have a restoration plan within primary and backup control rooms. Since the requirement has only one objective, only one VRF was assigned.</p>

VSLs for EOP-005-3, R5			
Lower	Moderate	High	Severe
N/A	N/A	N/A	The Transmission Operator did not make the latest Reliability Coordinator approved restoration plan available in its primary and backup control rooms prior to its effective date.

VSL Justifications for EOP-005-3, R5

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with restoration plans similar to EOP-005-2. The VSLs were revised slightly by replacing “implementation” with “effective.” The VSLs for this requirement meet or exceed the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment for R5 is not binary.</p> <p>Guideline 2b: The proposed VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

VSL Justifications for EOP-005-3, R5

<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>

VRF Justifications for EOP-005-3, R6	
Proposed VRF	Medium
NERC VRF Discussion	R6 is a requirement in a Long-term Planning time frame that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report R6 requires the Transmission Operator to verify that its restoration plan accomplishes its intended function. A violation of this requirement has been assigned a Medium VRF because, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. This is consistent with FERC guideline G1 regarding Emergency Operations.
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard The requirement contains three parts and only one VRF was assigned so there is no conflict.
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards This requirement calls for verification that its restoration plan accomplishes its intended function. This is a slightly revised requirement (EOP-005-2, Requirement R6) that is assigned a Medium VRF.
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs Failure to verify that its restoration plan accomplishes its intended function would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.
FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation R6 contains only one objective, which is to verify that its restoration plan accomplishes its intended function. Since the requirement has only one objective, only one VRF was assigned.

VSLs for EOP-005-3, R6

Lower	Moderate	High	Severe
<p>The Transmission Operator performed the verification within the required timeframe but did not comply with one of the requirement parts.</p>	<p>The Transmission Operator performed the verification within the required timeframe but did not comply with two of the requirement parts.</p>	<p>The Transmission Operator performed the verification but did not complete it within the required time frame.</p>	<p>The Transmission Operator did not perform the verification or it took more than six calendar years to complete the verification. OR The Transmission Operator performed the verification within the required timeframe but did not comply with any of the requirement parts.</p>

VSL Justifications for EOP-005-3, R6

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with restoration plans similar to EOP-005-2. The VSLs were revised slightly by replacing “subrequirements” with “requirement parts.” The VSLs for this requirement meet or exceed the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment for R6 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

VSL Justifications for EOP-005-3, R6

<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>

VRF Justifications for EOP-005-3, R7	
Proposed VRF	Medium
NERC VRF Discussion	R7 is a requirement in an Operations Planning time frame that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	<p>Guideline 1- Consistency w/ Blackout Report</p> <p>R7 requires the Transmission Operator to have Blackstart Resource testing requirements to verify that each Blackstart Resource is capable of meeting the requirements of its restoration plan. A violation of this requirement has been assigned a Medium VRF because, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. This is consistent with FERC guideline G1 regarding Emergency Operations.</p>
FERC VRF G2 Discussion	<p>Guideline 2- Consistency within a Reliability Standard</p> <p>The requirement contains several parts regarding Blackstart Resource testing topics and only one VRF was assigned so there is no conflict.</p>
FERC VRF G3 Discussion	<p>Guideline 3- Consistency among Reliability Standards</p> <p>This requirement calls for the Transmission Operator to have Blackstart Resource testing requirements to verify each Blackstart Resource is capable of meeting the requirements of its restoration plan. This is an unrevised requirement (EOP-005-2, Requirement R9) that is assigned a Medium VRF.</p>
FERC VRF G4 Discussion	<p>Guideline 4- Consistency with NERC Definitions of VRFs</p> <p>Failure to include Blackstart Resource testing requirements to verify each Blackstart Resource is capable of meeting the requirements of its restoration plan would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.</p>
FERC VRF G5 Discussion	<p>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</p>

VRF Justifications for EOP-005-3, R7

Proposed VRF	Medium
	R7 contains only one objective which is to include within its restoration plan requirements to verify each Blackstart Resource is capable of meeting the requirements of its restoration plan. Since the requirement has only one objective, only one VRF was assigned.

VSLs for EOP-005-3, R7

Lower	Moderate	High	Severe
N/A	N/A	N/A	The Transmission Operator's Blackstart Resource testing requirements do not address one or more of the requirement parts of Requirement R7.

VSL Justifications for EOP-005-3, R7

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with restoration plans similar to EOP-005-2. The VSLs were revised slightly by replacing “subrequirements” with “requirement parts.” The VSLs for this requirement meet or exceed the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R7 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

VSL Justifications for EOP-005-3, R7

<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>

VRF Justifications for EOP-005-3, R8	
Proposed VRF	Medium
NERC VRF Discussion	R8 is a requirement in an Operations Planning time frame that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report R8 requires the Transmission Operator to include within its operations training program System restoration training. A violation of this requirement has been assigned a Medium VRF because, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. This is consistent with FERC guideline G1 regarding Emergency Operations.
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard The requirement contains several parts regarding System restoration training. Only one VRF was assigned so there is no conflict.
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards This requirement calls for System restoration training to be included within its operations training program. This is a revised requirement (EOP-005-2, Requirement R10) that is assigned a Medium VRF.
FERC VRF G4 Discussion	Guideline 4- Consistency with NERC Definitions of VRFs Failure to include within its operations training program System restoration training would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.
FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation R8 contains only one objective, which is to include within its operations training program System restoration training. Since the requirement has only one objective, only one VRF was assigned.

VSLs for EOP-005-3, R8

Lower	Moderate	High	Severe
The Transmission Operator's training does not address one of the requirement parts of Requirement R8.	The Transmission Operator's training does not address two of the requirement parts of Requirement R8.	The Transmission Operator's training does not address three or more of the requirement parts of Requirement R8.	The Transmission Operator has not included System restoration training in its operations training program.

VSL Justifications for EOP-005-3, R8

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with System restoration from Blackstart Resources similar to EOP-005-2. The VSLs were revised slightly by replacing “subrequirement” with “requirement parts.” The VSLs for this requirement meet the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R8 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

VSL Justifications for EOP-005-3, R8

<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>

VRF Justifications for EOP-005-3, R9

Proposed VRF	Medium
NERC VRF Discussion	R9 is a requirement in an Operations Planning time frame that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	<p>Guideline 1- Consistency w/ Blackout Report</p> <p>R9 requires the Transmission Operator, applicable Transmission Owners, and applicable Distribution Providers to provide a minimum of two hours of System restoration training to their field switching personnel identified as performing unique tasks associated with the transmission Operator’s restoration plan that are outside of their normal tasks. A violation of this requirement has been assigned a Medium VRF because, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. This is consistent with FERC guideline G1 regarding Emergency Operations.</p>
FERC VRF G2 Discussion	<p>Guideline 2- Consistency within a Reliability Standard</p> <p>The requirement contains no parts and only one VRF was assigned so there is no conflict.</p>
FERC VRF G3 Discussion	<p>Guideline 3- Consistency among Reliability Standards</p> <p>This requirement calls for System restoration training to field switching personnel identified as performing unique tasks associated with the transmission Operator’s restoration plan that are outside of their normal tasks. This is a revised requirement (EOP-005-2, Requirement R11) that is assigned a Medium VRF.</p>
FERC VRF G4 Discussion	<p>Guideline 4- Consistency with NERC Definitions of VRFs</p> <p>Failure to provide a minimum of two hours of System restoration training to their field switching personnel identified as performing unique tasks associated with the transmission Operator’s restoration plan that are outside of their normal tasks would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.</p>

VRF Justifications for EOP-005-3, R9

Proposed VRF	Medium
FERC VRF G5 Discussion	<p>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</p> <p>R9 contains only one objective, which is to provide a minimum of two hours of System restoration training to their field switching personnel identified as performing unique tasks associated with the transmission Operator’s restoration plan that are outside of their normal tasks. Since the requirement has only one objective, only one VRF was assigned.</p>

VSLs for EOP-005-3, R9

Lower	Moderate	High	Severe
The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider failed to train 5% or less of the personnel required by Requirement R9 within a two-calendar-year period.	The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider failed to train more than 5% and up to 10% of the personnel required by Requirement R9 within a two-calendar-year period.	The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider failed to train more than 10% and up to 15% of the personnel required by Requirement R9 within a two-calendar-year period.	The Transmission Operator, applicable Transmission Owner, or applicable Distribution Provider failed to train more than 15% of the personnel required by Requirement R9 within a two-calendar-year period.

VSL Justifications for EOP-005-3, R9

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with System restoration from Blackstart Resources similar to EOP-005-2. The VSLs for this requirement meet or exceed the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R9 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

VSL Justifications for EOP-005-3, R9

<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>

VRF Justifications for EOP-005-3, R10	
Proposed VRF	Medium
NERC VRF Discussion	R10 is a requirement in an Operations Planning time frame that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	<p>Guideline 1- Consistency w/ Blackout Report</p> <p>R10 requires the Transmission Operator to participate in its Reliability Coordinator’s restoration drills, exercises, or simulations as requested by its Reliability Coordinator. A violation of this requirement has been assigned a Medium VRF because, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. This is consistent with FERC guideline G1 regarding Emergency Operations.</p>
FERC VRF G2 Discussion	<p>Guideline 2- Consistency within a Reliability Standard</p> <p>The requirement contains no parts and only one VRF was assigned so there is no conflict.</p>
FERC VRF G3 Discussion	<p>Guideline 3- Consistency among Reliability Standards</p> <p>This requirement calls for restoration drills, exercises, or simulations. This is an unrevised requirement (EOP-005-2, Requirement R12) that is assigned a Medium VRF.</p>
FERC VRF G4 Discussion	<p>Guideline 4- Consistency with NERC Definitions of VRFs</p> <p>Failure to participate in its Reliability Coordinator’s restoration drills, exercises, or simulations as requested by its Reliability Coordinator would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.</p>
FERC VRF G5 Discussion	<p>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</p> <p>R10 contains only one objective, which is to participate in restoration drills. Since the requirement has only one objective, only one VRF was assigned.</p>

VSLs for EOP-005-3, R10			
Lower	Moderate	High	Severe
N/A	N/A	N/A	The Transmission Operator has failed to comply with a request for its participation from its Reliability Coordinator.

VSL Justifications for EOP-005-3, R10

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with System restoration from Blackstart Resources similar to EOP-005-2. The VSLs were revised slightly by replacing “their” with “its.” The VSLs for this requirement meet or exceed the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R10 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

<p>FERC VSL G4</p> <p>Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5</p> <p>Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6</p> <p>VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>

VRF Justifications for EOP-005-3, R11	
Proposed VRF	Medium
NERC VRF Discussion	R11 is a requirement in an Operations Planning time frame that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	<p>Guideline 1- Consistency w/ Blackout Report</p> <p>R11 requires each Transmission Operator and each Generator Operator with a Blackstart Resource to have written Blackstart Resource Agreements or mutually-agreed upon procedures or protocols that specify the terms and conditions of their agreement. A violation of this requirement has been assigned a Medium VRF because, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. This is consistent with FERC guideline G1 regarding Emergency Operations.</p>
FERC VRF G2 Discussion	<p>Guideline 2- Consistency within a Reliability Standard</p> <p>The requirement contains no parts and only one VRF was assigned so there is no conflict.</p>
FERC VRF G3 Discussion	<p>Guideline 3- Consistency among Reliability Standards</p> <p>This requirement calls for Blackstart Resource Agreements. This is an unrevised requirement (EOP-005-2, Requirement R13) that is assigned a Medium VRF.</p>
FERC VRF G4 Discussion	<p>Guideline 4- Consistency with NERC Definitions of VRFs</p> <p>Failure to have written Blackstart Resource Agreements or mutually-agreed upon procedures or protocols that specify the terms and conditions of their agreement would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.</p>
FERC VRF G5 Discussion	<p>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</p>

VRF Justifications for EOP-005-3, R11

Proposed VRF	Medium
	R11 contains only one objective, which is to have written Blackstart Resource Agreements. Since the requirement has only one objective, only one VRF was assigned.

VSLs for EOP-005-3, R11

Lower	Moderate	High	Severe
N/A	The Transmission Operator and Generator Operator with a Blackstart Resource do not reference Blackstart Resource Testing requirements in their written Blackstart Resource Agreements or mutually-agreed upon procedures or protocols.	N/A	The Transmission Operator and Generator Operator with a Blackstart resource do not have a written Blackstart Resource Agreement or mutually-agreed upon procedure or protocol.

VSL Justifications for EOP-005-3, R11

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with System restoration from Blackstart Resources similar to EOP-005-2. The VSLs for this requirement meet or exceed the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R11 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

VSL Justifications for EOP-005-3, R11

<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>

VRF Justifications for EOP-005-3, R12	
Proposed VRF	Medium
NERC VRF Discussion	R12 is a requirement in an Operations Planning time frame that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	<p>Guideline 1- Consistency w/ Blackout Report</p> <p>R12 requires each Generator Operator with a Blackstart Resource to have documented procedures for starting each Blackstart Resource and energizing a bus. A violation of this requirement has been assigned a Medium VRF because, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. This is consistent with FERC guideline G1 regarding Emergency Operations.</p>
FERC VRF G2 Discussion	<p>Guideline 2- Consistency within a Reliability Standard</p> <p>The requirement contains no parts and only one VRF was assigned so there is no conflict.</p>
FERC VRF G3 Discussion	<p>Guideline 3- Consistency among Reliability Standards</p> <p>This requirement calls for documented procedures for starting each Blackstart Resource and energizing a bus. This is an unrevised requirement (EOP-005-2, Requirement R14) that is assigned a Medium VRF.</p>
FERC VRF G4 Discussion	<p>Guideline 4- Consistency with NERC Definitions of VRFs</p> <p>Failure to have documented procedures for starting each Blackstart Resource and energizing a bus would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.</p>
FERC VRF G5 Discussion	<p>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</p> <p>R12 contains only one objective, which is to have to have documented procedures for starting each Blackstart Resource and energizing a bus. Since the requirement has only one objective, only one VRF was assigned.</p>

VSLs for EOP-005-3, R12			
Lower	Moderate	High	Severe
N/A	N/A	N/A	The Generator Operator does not have documented starting and bus energizing procedures for each Blackstart Resource.

VSL Justifications for EOP-005-3, R12

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with System restoration from Blackstart Resources similar to EOP-005-2. The VSLs for this requirement meet or exceed the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R12 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

VSL Justifications for EOP-005-3, R12

<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>

VRF Justifications for EOP-005-3, R13

Proposed VRF	Medium
NERC VRF Discussion	R13 is a requirement in an Operations Planning time frame that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	<p>Guideline 1- Consistency w/ Blackout Report</p> <p>R13 requires each Generator Operator with a Blackstart Resource to notify its Transmission Operator of any known changes to the capabilities of that Blackstart Resource affecting the ability to meet the Transmission Operator’s restoration plan. A violation of this requirement has been assigned a Medium VRF because, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. This is consistent with FERC guideline G1 regarding Emergency Operations.</p>
FERC VRF G2 Discussion	<p>Guideline 2- Consistency within a Reliability Standard</p> <p>The requirement contains no parts and only one VRF was assigned so there is no conflict.</p>
FERC VRF G3 Discussion	<p>Guideline 3- Consistency among Reliability Standards</p> <p>This requirement calls for each Generator Operator with a Blackstart Resource to notify its Transmission Operator of any known changes to the capabilities of that Blackstart Resource affecting the ability to meet the Transmission Operator’s restoration plan. This is an unrevised requirement (EOP-005-2, Requirement R15) that is assigned a Medium VRF.</p>
FERC VRF G4 Discussion	<p>Guideline 4- Consistency with NERC Definitions of VRFs</p> <p>Failure to have each Generator Operator with a Blackstart Resource notify its Transmission Operator of any known changes to the capabilities of that Blackstart Resource affecting the ability to meet the Transmission Operator’s restoration plan would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.</p>

VRF Justifications for EOP-005-3, R13

Proposed VRF	Medium
FERC VRF G5 Discussion	<p>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</p> <p>R13 contains only one objective, which is to have to have each Generator Operator with a Blackstart Resource to notify its Transmission Operator of any known changes to the capabilities of that Blackstart Resource affecting the ability to meet the Transmission Operator’s restoration plan. Since the requirement has only one objective, only one VRF was assigned.</p>

VSLs for EOP-005-3, R13

Lower	Moderate	High	Severe
The Generator Operator with a Blackstart Resource did not notify the Transmission Operator of a known change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan within 24 hours but did make the notification within 48 hours.	The Generator Operator with a Blackstart Resource did not notify the Transmission Operator of a known change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan within 48 hours but did make the notification within 72 hours.	The Generator Operator with a Blackstart Resource did not notify the Transmission Operator of a known change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan within 72 hours but did make the notification within 96 hours.	The Generator Operator with a Blackstart Resource did not notify the Transmission Operator of a known change in Blackstart Resource capability affecting the ability to meet the Transmission Operator’s restoration plan for more than 96 hours.

VSL Justifications for EOP-005-3, R13

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with System restoration from Blackstart Resources similar to EOP-005-2. The VSLs for this requirement meet or exceed the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R13 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

VSL Justifications for EOP-005-3, R13

<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>

VRF Justifications for EOP-005-3, R14

Proposed VRF	Medium
NERC VRF Discussion	R14 is a requirement in an Operations Planning time frame that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	<p>Guideline 1- Consistency w/ Blackout Report</p> <p>R14 requires each Generator Operator with a Blackstart Resource to perform Blackstart Resource tests in accordance with the testing requirements set by the Transmission Operator. A violation of this requirement has been assigned a Medium VRF because, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. This is consistent with FERC guideline G1 regarding Emergency Operations.</p>
FERC VRF G2 Discussion	<p>Guideline 2- Consistency within a Reliability Standard</p> <p>The requirement contains two parts and only one VRF was assigned so there is no conflict.</p>
FERC VRF G3 Discussion	<p>Guideline 3- Consistency among Reliability Standards</p> <p>This requirement calls for each Generator Operator with a Blackstart Resource to perform Blackstart Resource tests in accordance with the testing requirements set by the Transmission Operator. This is an unrevised requirement (EOP-005-2, Requirement R16) that is assigned a Medium VRF.</p>
FERC VRF G4 Discussion	<p>Guideline 4- Consistency with NERC Definitions of VRFs</p> <p>Failure to have each Generator Operator with a Blackstart Resource to perform Blackstart Resource tests in accordance with the testing requirements set by the Transmission Operator would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.</p>
FERC VRF G5 Discussion	<p>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</p>

VRF Justifications for EOP-005-3, R14

Proposed VRF	Medium
	R14 contains only one objective, which is to have to have each Generator Operator with a Blackstart Resource to perform Blackstart Resource tests in accordance with the testing requirements set by the Transmission Operator. Since the requirement has only one objective, only one VRF was assigned.

VSLs for EOP-005-3, R14

Lower	Moderate	High	Severe
<p>The Generator Operator with a Blackstart Resource performed tests and maintained records but the records did not include all of the items in Requirement R14, Part 14.1.</p> <p>OR</p> <p>The Generator Operator did not supply the Blackstart Resource testing records as requested for 31 to 60 calendar days after the request.</p>	<p>The Generator Operator with a Blackstart Resource performed tests and maintained records but did not supply the Blackstart Resource testing records as requested for 61 to 90 calendar days after the request.</p>	<p>The Generator Operator with a Blackstart Resource performed tests but either did not maintain records or did not supply the Blackstart Resource testing records as requested within 91 or more calendar days after the request.</p>	<p>The Generator Operator with a Blackstart Resource did not perform Blackstart Resource tests.</p>

VSL Justifications for EOP-005-3, R14

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with System restoration from Blackstart Resources similar to EOP-005-2. The VSLs for this requirement meet or exceed the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R14 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

VSL Justifications for EOP-005-3, R14

<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>

VRF Justifications for EOP-005-3, R15	
Proposed VRF	Medium
NERC VRF Discussion	R15 is a requirement in an Operations Planning time frame that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	<p>Guideline 1- Consistency w/ Blackout Report</p> <p>R15 requires each Generator Operator with a Blackstart Resource to provide training to its operating personnel responsible for the startup of its Blackstart Resource generation units and energizing a bus. A violation of this requirement has been assigned a Medium VRF because, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. This is consistent with FERC guideline G1 regarding Emergency Operations.</p>
FERC VRF G2 Discussion	<p>Guideline 2- Consistency within a Reliability Standard</p> <p>The requirement contains two parts and only one VRF was assigned so there is no conflict.</p>
FERC VRF G3 Discussion	<p>Guideline 3- Consistency among Reliability Standards</p> <p>This requirement calls for each Generator Operator with a Blackstart Resource to provide training to its operating personnel responsible for the startup of its Blackstart Resource generation units and energizing a bus. This is an unrevised requirement (EOP-005-2, Requirement R17) that is assigned a Medium VRF.</p>
FERC VRF G4 Discussion	<p>Guideline 4- Consistency with NERC Definitions of VRFs</p> <p>Failure to have each Generator Operator with a Blackstart Resource to provide training to its operating personnel responsible for the startup of its Blackstart Resource generation units and energizing a bus would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.</p>
FERC VRF G5 Discussion	<p>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</p>

VRF Justifications for EOP-005-3, R15

Proposed VRF	Medium
	R15 contains only one objective, which is to have to have each Generator Operator with a Blackstart Resource to provide training to its operating personnel responsible for the startup of its Blackstart Resource generation units and energizing a bus. Since the requirement has only one objective, only one VRF was assigned.

VSLs for EOP-005-3, R15

Lower	Moderate	High	Severe
The Generator Operator with a Blackstart Resource did not train less than or equal to 10% of the personnel required by Requirement R15 within a two-calendar-year period.	The Generator Operator with a Blackstart Resource did not train more than 10% and less than or equal to 25% of the personnel required by Requirement R15 within a two-calendar-year period.	The Generator Operator with a Blackstart Resource did not train more than 25% and less than or equal to 50% of the personnel required by Requirement R15 within a two-calendar-year period.	The Generator Operator with a Blackstart Resource did not train more than 50% of the personnel required by Requirement R15 within a two-calendar-year period.

VSL Justifications for EOP-005-3, R15

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with System restoration from Blackstart Resources similar to EOP-005-2. The VSLs for this requirement meet or exceed the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R15 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

VSL Justifications for EOP-005-3, R15

<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>

VRF Justifications for EOP-005-3, R16

Proposed VRF	Medium
NERC VRF Discussion	R16 is a requirement in an Operations Planning time frame that, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures.
FERC VRF G1 Discussion	<p>Guideline 1- Consistency w/ Blackout Report</p> <p>R16 requires each Generator Operator to participate in the Reliability Coordinator’s restoration drills, exercises, or simulations as requested by the Reliability Coordinator. A violation of this requirement has been assigned a Medium VRF because, if violated, could directly affect the electrical state or the capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system. This is consistent with FERC guideline G1 regarding Emergency Operations.</p>
FERC VRF G2 Discussion	<p>Guideline 2- Consistency within a Reliability Standard</p> <p>The requirement contains one part and only one VRF was assigned so there is no conflict.</p>
FERC VRF G3 Discussion	<p>Guideline 3- Consistency among Reliability Standards</p> <p>This requirement calls for each Generator Operator to participate in the Reliability Coordinator’s restoration drills, exercises, or simulations. This is an unrevised requirement (EOP-005-2, Requirement R18) that is assigned a Medium VRF.</p>
FERC VRF G4 Discussion	<p>Guideline 4- Consistency with NERC Definitions of VRFs</p> <p>Failure to have each Generator Operator to participate in the Reliability Coordinator’s restoration drills, exercises, or simulations would not be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor and control the bulk electric system.</p>
FERC VRF G5 Discussion	<p>Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation</p>

VRF Justifications for EOP-005-3, R16

Proposed VRF	Medium
	R16 contains only one objective, which is to have to have each Generator Operator participate in the Reliability Coordinator’s restoration drills, exercises, or simulations. Since the requirement has only one objective, only one VRF was assigned.

VSLs for EOP-005-3, R16

Lower	Moderate	High	Severe
N/A	N/A	N/A	The Generator Operator failed to participate in the Reliability Coordinator’s restoration drills, exercises, or simulations as requested by its Reliability Coordinator.

VSL Justifications for EOP-005-3, R16

<p>FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance</p>	<p>EOP-005-3 deals with System restoration from Blackstart Resources similar to EOP-005-2. The VSLs for this requirement meet or exceed the current level of compliance.</p>
<p>FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties <u>Guideline 2a:</u> The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent <u>Guideline 2b:</u> Violation Severity Level Assignments that Contain Ambiguous Language</p>	<p>Guideline 2a: The VSL assignment is for R16 is not binary.</p> <p>Guideline 2b: The propose VSL does not use any ambiguous terminology, thereby supporting uniformity and consistency in the determination of similar penalties for similar violations.</p>
<p>FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement</p>	<p>The proposed VSL uses similar terminology to that used in the associated requirement, and is therefore consistent with the requirement.</p>

VSL Justifications for EOP-005-3, R16

<p>FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations</p>	<p>Proposed VSLs are based on a single violation and not a cumulative violation methodology.</p>
<p>FERC VSL G5 Requirements where a single lapse in protection can compromise computer network security, i.e., the 'weakest link' characteristic, should apply binary VSLs</p>	<p>Non CIP</p>
<p>FERC VSL G6 VSLs for cyber security requirements containing interdependent tasks of documentation and implementation should account for their interdependence</p>	<p>Non CIP</p>