

**NSRS Meeting Notes**  
**December 10, 2008**

Only two scheduled meeting left for this year. Wednesday 12/17 and 12/31. There will not be a call on 12/24.

Discussed the MOD-030-2 ballot - NSRS Recommendation to Abstain (vote due today)

Draft a note to the MRO Standards Committee about the NSRS participating on FERC NOPRs

Contact NERC about comments NERC submits to FERC.

NUC-001 - research the implementation date.

CIP Standards 2 thru 9 Comments: \*\* Note due on Monday 1/5.

Highlighted some points, prepare for full discussion next Wednesday 12/17.

Send your comments to Pam Sordet, [pamela.j.sordet@xcelenergy.com](mailto:pamela.j.sordet@xcelenergy.com) Comment about CIP-006 R4

US Army COE Request for Interpretation (CIP-006-1a, R4) Leaning to Affirmative. Coordinate comments with CIP-006 comments.

Ken Goldsmith sent out comments about Transmission Operations Violation Severity Levels (TOP-004-2) No position was considered. However there was a discussion about "Double Jeopardy". I have attached Ken's comments

About Double Jeopardy:

From the NERC Sanctions Guidelines Section 3.10 (see attached) 3.10 Multiple Violations A violation is a failure or inadequacy to meet a requirement of a reliability standard by a party responsible to comply with that requirement.

The failure or inadequacy of a violator to comply may involve more than one standard or several requirements of a single standard; as such, multiple individual violations may be in play when penalties, sanctions, or remedial actions for an incident or situation of noncompliance are being determined. Strictly speaking, NERC or the regional entity can determine and levy a separate penalty or sanction, or direct remedial action, upon a violator for each individual violation. However, in instances of multiple violations related to a single act or common incidence of noncompliance, NERC or the regional entity will generally determine and issue a single aggregate penalty, sanction, or remedial action directive bearing reasonable relationship to the aggregate of the related violations. The penalty, sanction, or remedial action will not be that determined individually for the least serious of the violations; it will generally be at least as large or expansive as what would be called for individually for the most serious of the violations.

Some entities may be registered as being responsible for more than one function (e.g., transmission owner, transmission operator, balancing authority, generation operator), and a single requirement in some reliability standards may apply to the responsible entity for several functions. Where several functions are performed by the same entity, a violation will be assessed against the entity, not against each function.