

**Official Comment Form for Project 2007-23 — Violation Severity Levels**

Please use this form to submit comments on the proposed Violation Severity Levels (VSLs) developed in response to FERC’s June 19, 2008 Order on Violation Severity Levels.

**Comments must be submitted by April 30, 2009.** You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words “VSL Order Comment Form” in the subject line. If you have any questions on the subject information please contact Al Calafiore at [Al.Calafiore@nerc.net](mailto:Al.Calafiore@nerc.net).

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<b>ERCOT</b>		1 – Transmission Owners
<b>FRCC</b>		2 – RTOs and ISOs
<b>MRO</b>		3 – Load-serving Entities
<b>NPCC</b>		4 – Transmission-dependent Utilities
<b>RFC</b>		5 – Electric Generators
<b>SERC</b>		6 – Electricity Brokers, Aggregators, and Marketers
<b>SPP</b>		7 – Large Electricity End Users
<b>WECC</b>		8 – Small Electricity End Users
<b>NA – Not Applicable</b>		9 – Federal, State, Provincial Regulatory or other Government Entities
		10 – Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)			
<b>Group Name:</b>		MRO NERC Standards Review Subcommittee	
<b>Lead Contact:</b>		Michael Brytowski	
<b>Contact Organization:</b>		MRO	
<b>Contact Segment:</b>		10	
<b>Contact Telephone:</b>		651-855-1728	
<b>Contact E-mail:</b>		mj.brytowski@midwestreliability.org	
Additional Member Name	Additional Member Organization	Region*	Segment*
Carol Gerou	MP	MRO	1,3,5,6
Neal Balu	WPS	MRO	3,4,5,6
Terry Bilke	MISO	MRO	2
Joe DePoorter	MGE	MRO	3,4,5,6
Ken Goldsmith	ALTW	MRO	4
Jim Haigh	WAPA	MRO	1,6
Terry Harbour	MEC	MRO	1,3,5,6
Joseph Knight	GRE	MRO	1,3,5,6
Scott Nickels	RPU	MRO	3,4,5,6
Dave Rudolph	BEPC	MRO	1,3,5,6
Eric Ruskamp	LES	MRO	1,3,5,6
Pam Sordet	XCEL	MRO	1,3,5,6


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

### Background Information:

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

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

FERC also directed NERC to modify some VSLs and identified these VSLs in Appendix A of its VSL Order. These revised VSLs are shown in the VSLs posted for comment.

With this comment form, stakeholders are being asked to comment on eight separate sets of VSLs. Each set of VSLs is in a separate file that will, eventually, be posted for ballot. Each of the seven sets of VSLs covers several standards as identified below:

- BAL — Standards BAL-001 through BAL-006
- CIP, COM, and VAR — Standards CIP-001, COM-001, COM-002, VAR-001, VAR-002
- FAC and MOD — Standards FAC-001, FAC-002, FAC-003, FAC-008, FAC-009, and FAC-013 and MOD-006, MOD-007, MOD-010, MOD-012 and MOD-016 through MOD-021
- INT, PER, and NUC — Standards INT-001, INT-003 through INT-010, PER-001 through PER-004, and NUC-001
- IRO — Standards IRO-001 through IRO-006 and IRO-014 through IRO-016
- PRC — Standards PRC-001, PRC-004, PRC-005, PRC-007 through PRC-011, PRC-015 through PRC-018, PRC-021, and PRC-022
- TOP — Standards TOP-001 through TOP-008
- TPL — Standards TPL-001 through TPL-004

The drafting team for Project 2007-23 Violation Severity Levels is requesting industry comments on the proposed VSLs. Accordingly, we request that you complete and submit this form to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **April 30, 2009**.

**If you need to add a row to the tables below please select “Table” from the MS Word toolbar than select “Insert” then select “Row Above” or “Row Below”**

















- 9. If there any other comments you wish to provide (relative to the VSLs) that you have not already provided in responses to the questions above, please provide them here.**

Comments: The MRO NSRS commends the work of the VSLDT. The MRO NSRS does not have any additional comments on the VSLs.