

**Individual or group. (18 Responses)**  
**Name (13 Responses)**  
**Organization (13 Responses)**  
**Group Name (5 Responses)**  
**Lead Contact (5 Responses)**  
**IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS,**  
**YOU MAY DO SO HERE. (2 Responses)**  
**Comments (18 Responses)**  
**Question 1 (16 Responses)**  
**Question 1 Comments (16 Responses)**

Individual
Don Jones
Texas Reliability Entity
No
We do support the proposals except as noted below: EOP VSLs: 1. Regarding EOP-008-1 (R3, R4, R6): TRE suggests this VSL should be binary (Severe) with respect to having a backup control center/functionality only. We agree with FERC that the VSLs should not be based on violations of other standards, and we suggest the low, moderate and high VSLs should simply be deleted. 2. Regarding EOP-005-2 (R2): There are days that are not covered by this VSL, in particular on days 11, 21 and 31. Texas RE suggests the following changes: (a) Moderate should be "more than 10 days . . ."; (b) High should be "more than 20 days . . ."; and (c) Severe should be "more than 30 days . . .". 3. Regarding EOP-005-2 (R16): The Moderate VSL should include the same language ["and maintained records but did not supply ..."] as is included in Lower level. This would clarify that failure to maintain records results in a High VSL. IRO VSLs: 1. Regarding IRO-008-1 (R3): Please clarify whether "failed to share . . . with any of the entities" means "shared with some but not all of the entities" or "shared with none of the entities." 2. Regarding IRO-001-1.1 (R7): There could be more gradation associated with a violation of this requirement based on whether some or all agreements exist and are clear and comprehensive. In the Moderate VSL, what if some of the agreements are clear and comprehensive but some are not? In the Severe VSL, what if the RC has agreements with some adjacent RCs, but not with all of them? 3. Regarding IRO-002-2 (R5): (1) In the Severe VSL, the term "any" is ambiguous. Does "failed to monitor ANY BES elements" mean "monitored some but not all BES elements" or "monitored no BES elements." (2) We suggest that you consider moving the existing language from High to Moderate level, and then create a new High VSL for violations associated with failing to monitor some [but not all] of the main BES elements, and revise the Severe VSL to cover a violation where no BES elements were monitored. 4. Regarding IRO-002-2 (R7): Clarify to differentiate between the Moderate VSL and 1st part of the Severe VSL. If an entity "failed to ensure" such that there was no interruption in monitoring, is the violation a Moderate VSL or a Severe VSL?
Individual
Douglas Dickson
Puget Sound Energy
Yes
Group
Bonneville Power Administration
Jamison Dye
No
FAC-501-WECC-1, R 1/R 1.1, VSL Guideline While BPA agrees with the removal of the ambiguity for R1 when referring to Transmission Owners not performing maintenance and inspection for facilities, BPA does not agree with removing the reference to the section of the VSL about "one, two, or three of the paths identified". These considerations support the intent of R1.1 that the TMIP be annually reviewed but allow varying levels of VSL for R1. This varying level is also consistent with the other VSLs within FAC-501-WECC-1, such as seen in R2 and R3. Based on this, BPA recommends that the Lower, Moderate, and High VSL for R1 be modified to include the "one, two, or three of the paths identified" statements as included in the original VSL for R1. It would also be reasonable for R.1.1 to have varying levels of VSL when the process of annually reviewing the TMIP and getting official management approvals may take extra months beyond exactly 12. It is recommended that the Lower, Moderate and High VSL levels provide for one, two and three months past the annual review anniversary date, provided that the review is in progress. PER-005-1, R1/R3, VSL Guideline BPA disagrees with NERC's decision to change the VRF's for R1 and R3 from a medium to a high. The original justification for the medium VRF level still holds true as neither of these requirements are likely to lead to bulk power system instability if not followed. Because of this, BPA recommends maintaining these requirements at a medium violation level.
Group
Arizona Public Service Company
Jana Van Ness, Director Regulatory Compliance
No
FAC-010-2.1: FAC-010 standard is about methodology and most of the requirements are repeat of TPL requirements. Having a complicated VSL which checks item by item sub requirement does not serve any reliability purpose. This VSL should be simplified. It should be "lower" if the methodology is incomplete and "higher" if there is no methodology document. FAC-011-2 R4: An RC issues its methodology for hundreds of entities in its area. Incrementing VSL by failing to issue SOL to one entity is unreasonable. The VSL should be lower if it RC failed to issue the methodology to one or more entities and should be higher if it completely failed to issue the methodology. For this standard, VSL should not be based upon time delay. FAC-501-WECC-1: In a binary type of VSL it should be "low and severe" and not "higher and severe". There is no justification given for higher VSL for the first entry. TOP-006-2 R2: There are many TOPs which own and monitor far less than 100 BES lines. For them VSL based upon 1% increment is too stringent. FERC said 5% increments are too high for TOPs with thousands of lines. This does not mean NERC has to go down to 1% increment. Suggest it be based upon the number of BES lines not monitored and not on %.
Group
Southern Company

Shammara Hasty
Yes
No comments.
Individual
Andrew Gallo
City of Austin dba Austin Energy
No
Austin Energy (AE) voted "Affirmative" on this non-binding poll because we agree with a majority of the proposed revisions. However, AE does not agree with the two VRFs listed below: (1) EOP-008-1, R2 VRF - AE disagrees with the current proposal of a "Medium" VRF and supports the original proposal of a "Lower" VRF. The requirement to "have a copy of its current Operating Plan for backup functionality available at its primary control center and at the location providing backup functionality" is an administrative requirement. AE supports the original guideline explanation: "Failure to have a copy of the Operating Plan for backup functionality at each of its control locations should not have an adverse impact on the BPS because operations at the different locations should be essentially identical. This is mainly an administrative requirement and thus meets NERC's criteria for a Lower VRF." (2) PER-005-1, R1 VRF - AE disagrees with the current proposal of a "High" VRF and supports the original proposal of a "Medium" VRF. FERC staff noted that implementation activities are usually assigned a "High" VRF. For a requirement to be assigned a "High" VRF, the expectation should be that failure to meet the required performance "will" result in instability, separation or cascading failures. This requirement does not involve implementing actions on the BES. It covers training implementation and it would be over-reaching to assume the failure to implement a training program "will" result in instability, separation or cascading failures. See EOP-005-2, R10 for support of a training implementation requirement with a "Medium" VRF.
Individual
Tiffany Lake
Westar Energy
Yes
Group
PacifiCorp
Ryan Millard
No
PacifiCorp does not support the continued use of VRFs and VSLs. VRFs and VSLs are a flawed process to determine the level of severity for a potential violation. The increase in severity levels and risk factors during updates of existing standards provides little constructive information. The inclusion of the VRFs and VSLs in the balloting process (without binding balloting by the industry) is a drain on industry resources and the balloting process and serves no helpful purpose.
Individual
Anthony Jablonski
ReliabilityFirst
No
ReliabilityFirst generally votes in the Affirmative for all the families of VRF/VSL changes except we vote in the negative for the EOP and FAC family of standards. ReliabilityFirst votes in the Negative for the EOP and FAC family of standards for the reasons below. ReliabilityFirst offers the following comments for consideration: 1. EOP-008-1, Requirement R5 - Severe VSL a. ReliabilityFirst agrees with the commission in that the first part of the "Severe" VSL adds to the requirement. The "Severe" uses language such as "... its dated, current, in force..." to describe the operating plan which is not required in the actual requirement. ReliabilityFirst recommends removing the phrase "its dated, current, in force" from the Severe" VSL. 2. FAC-011-2, Requirement R4 (The specified day thresholds are not inclusive) a. For the Moderate, High and Severe VSLs, the gradation does not cover all the days in periodicity in which an entity is late. For example, the "Low" states "...no more than 10 calendar days after the effectiveness..." and the "Moderate" VSL states "...more than 11 calendar days after the effectiveness..." From the revised wording, it is unclear which VSL category an entity would fall under if they were 11 days late? ReliabilityFirst recommends revising the "Moderate VSL" to state: "more than or equal to 11 calendar days..." 3. PER-005-1, Requirement R1 a. For consistency with the other VSLs, ReliabilityFirst recommends adding the parenthetical "(R1.4)" to the second part under the Moderate VSL. 4. TPL-003-0a, Requirement R2 a. For consistency with the other VSLs in R2, ReliabilityFirst recommends adding the following language to the beginning of the third part under the "High" VSL: "The responsible entity provided documented evidence of corrective action plans in order to satisfy Category C planning requirements..."
Individual
Randy Young
Arizona Public Service Co.
No
FAC-010-2.1: FAC-010 standard is about methodology and most of the requirements are repeat of TPL requirements. Having a complicated VSL which checks item by item sub requirement does not serve any reliability purpose. This VSL should be simplified. It should be "lower" if the methodology is incomplete and "higher" if there is no methodology document. FAC-011-2 R4: An RC issues its methodology for hundreds of entities in its area. Incrementing VSL by failing to issue SOL to one entity is unreasonable. The VSL should be lower if it RC failed to issue the methodology to one or more entities and should be higher if it completely failed to issue the methodology. For this standard, VSL should not be based upon time delay. FAC-501-WECC-1: In a binary type of VSL it should be "low and severe" and not "higher and severe". There is no justification given for higher VSL for the first entry. TOP-006-2 R2: There are many TOPs which own and monitor far less than 100 BES lines. For them VSL based upon 1% increment is too stringent. FERC said 5% increments are too high for TOPs with thousands of lines. This does not mean NERC has to go down to 1% increment. Suggest it be based upon the number of BES lines not monitored and not on %.
Individual
Nazra Gladu

Manitoba Hydro
No
<p>Although we support most of the changes proposed, we have some minor concerns with the following: EOP-005-2, R2 (and others): The comments from NERC indicate that the requirement is administrative in nature but that the implications could be more than administrative; therefore the VRF would be changed to Medium. This does not match up with the VRF Guideline which refers to a requirement being 'administrative in nature', and does not include an assessment of the potential implications. VRF Guidelines: Each of the paragraphs (High Risk Requirement, Medium Risk Requirement and Lower Risk Requirement) could benefit from some punctuation, numbering, etc. to make clear what the specific requirements are as several criteria are lumped together and it is not always entirely clear. Furthermore, there is some repetitiveness in the criteria (for example, in the Medium Risk Requirement paragraph, the last sentence seems to be a repeat of the preceding sentence and the statement 'A planning requirement that is administrative in nature' does not seem necessary at the end of the Lower Risk Requirement paragraph). VSL Guidelines: Several documents are listed without reference or proper citations given (for example, the VSL Order, NERC's VSL Compliance filing, etc.). EOP-008-1: There are several references here made to the "Evil Three" and the 'big three' without explanation of what this is. EOP-008-1, R6: The comments from NERC indicate that they will not use the VSLs to fix a problem with the requirement language and that the VSLs simply use the language of the requirement. We agree with this idea. Our question is whether or not these comments then get forwarded to the SDT for that particular requirement and these concerns are noted there for potential revision of the requirement?</p>
Individual
Marie Knox
MISO
No
<p>EOP-005-2, R2: Lower &gt; Medium. FERC cites Guideline 4, consistency with NERC definition of VRF. Medium, "A requirement that, if violated, could directly affect the electrical state or the capability of the bulk electric system..." R2 states: "...shall provide the entities identified in its approved restoration plan with a description of any changes to their roles and specific tasks..." We recommend Lower VRF, this task is administrative and is effectively covered in R3. EOP-005-2, R5: Lower &gt; Medium. FERC cites Guideline 4, consistency with NERC definition of VRF. Medium, "A requirement that, if violated, could directly affect the electrical state or the capability of the bulk electric system..." R5 states: "...shall have a copy of its latest Reliability Coordinator approved restoration plan within its primary and backup control rooms so that it is available to all of its System Operators..." We recommend Lower VRF. This is an administrative requirement. EOP-006-2, R6: Lower &gt; Medium. Similar to EOP-005-2, R2, FERC cites Guideline 4. Overlaps with R1 and R3. We recommend Lower VRF. This is an administrative requirement. EOP-008-1, R1: Medium &gt; High. FERC cites Guideline 3, inconsistency with EOP-005-2, R1. NERC does Not believe EOP-005 &amp; EOP-008 addresses the aspect of operations. We disagree with the High VSL assignment. EOP-006-2, R6. The VRF should remain lower. EOP-008-1, R5: Lower &gt; Medium. FERC cites Guideline 3, inconsistency with EOP-005-2, R1. NERC does not believe EOP-005 &amp; EOP-008 address the aspect of operations. We disagree with the High VSL assignment. IRO-008-1, R1: Medium &gt; High. NERC cites: IRO-004-2 R1 requires next-day assessments to be treated in the same manner as Real-time operating events, it does seem appropriate to assign the same VRFs for IRO-008-1 R1 and IRO-008-1 R2. Thus, NERC staff proposes changing the R1 VRF assignment to High. NERC contradicts itself with: NERC staff believes that the distinction between the Operations Planning time frame in IRO-008-1 R1 and the Real-time Operations time frame in IRO-008-1 R2 is essential to the proper analysis of R1's Medium VRF and R2's High VRF. Based on those analyses, the difference in VRF assignments does seem appropriate. We do not agree with NERC's analysis, and we recommend the VRF stay at Medium. PER-005-1, R1: Medium &gt; High. This requirement is for establishing a training program. While training is important, it will not directly cause a separation, cascading outage or a blackout. We recommend VRF of Medium.</p>
Individual
Michael Falvo
Independent Electricity System Operator
No
<p>We agree with most of the proposed changes, but have the following comments/disagreements: • Non-substantive revisions: OK • BAL-003-0.1b: OK • BAL-005-0.1b: OK • EOP-005-2: OK • EOP-006-2: OK • EOP-008-1, R1: We do not agree with raising the VRFs for R1 from a Medium to a High, despite FERC's rationale. Having the backup control center capability is intended to be, as suggested by the name, a backup for continuous operation with the same level of capability. This is an insurance measure, not a primary measure for reliable operations. Unlike backup protection, which is needed to ensure faults are cleared when the primary protection fails to operate, experience has shown that actual use of BU control center has been very infrequent and far between, if at all. This illustrates that the loss of the primary control center (capability) is a rare event for which the risk impact is minimal. It follows that in the case of R1, we are unable to rationalize and justify that failure to have a current Operating Plan describing the manner in which the entity continues to meet an entity's functional obligations should be assigned a high VRF. Furthermore, the absence of a plan does not nor would not directly cause or contribute to Bulk-Power System instability, separation, or a cascading sequence of failures, or could place the Bulk- Power System at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition, these being the conditions for assignment of a high risk. We therefore suggest that the VRFs for R1 be retained at the Medium level. • FAC-010-2.1: OK • FAC-011-2: OK • IRO-001-1.1: OK • IRO-002-2: OK • IRO-005-3a: OK • IRO-008-1: OK • IRO-009-1: OK • IRO-010-1a: OK • IRO-015-1: OK • MOD-028-1: OK • MOD-029-1a: OK • NUC-001-2: OK • PER-005-1, R1: We do not believe that simply prescribing the methodology used to develop the training program should increase the VRF from medium to high for requirement R1. The requirement is administrative in nature and does not meet the guideline test for assignment of high risk. The risk of non-compliance does not increase as a result of the new methodology. • TOP-001-1a: OK • TOP-002-2b: OK • TOP-006-2: OK • TOP-007-0: OK • TPL-001-1.1: OK • TPL-002-0a: OK • TPL-003-0a: OK</p>
Individual
Darryl Curtis
Oncor Electric Delivery
No
<p>VRFs EOP-008-1 R1 Oncor recommends the VRF should remain at Medium. NERC Guidelines criteria for a "High VRF" is a requirement, if violated, will directly result in instability, separation, or cascading failures. The failure to have an Operating Plan for continued operations, backup control center, due to the loss of a primary control center does not rise to the level of an absolute whereas, it could directly affect the stability of the BES which would align to a "Medium VRF" criteria. EOP-008 R5 Oncor recommends the VRF should remain at Low. An annual review is administrative in nature and would have little to no impact on the continued operations; therefore this aligns with the "Low VRF" criteria. PER-005-1 R1 Oncor recommends the VRF should remain at Medium. NERC Guidelines criteria for a "High VRF" is a requirement, if violated, will directly result in instability, separation, or cascading failures. There are multiple methodologies which ensure training is</p>

successful and effective; it is not a one size fits all. The industry is very diverse and entities need to develop training which fits the organization and objectives. Whether a company trains its system operators by using a systematic approach to training or if they have other means of providing training does not warrant a High Violation Risk Factor. PER-005-1 R3 Oncor recommends the VRF should remain at Medium. Whether or not the entity trains its system operators for 32 hours in Emergency Operations every 12 months, does not create an absolute "will" result in instability, separation, or cascading failures. VSLs PER-005 R2 Oncor does not think R2 is a "pass or fail" requirement and as a result, the VSL should be established with a range for noncompliance performance. The VSL level could be defined as a percentage for example, ♣ Lower - The responsible entity failed to verify less than 5% of its System Operators capabilities to perform each new or modified task within six months of making a modification to its BES company specific reliability related task list ♣ Severe - The responsible entity failed to verify any of its System Operators capabilities to perform each new or modified task within six months of making a modification to its BES company specific reliability related task list Oncor also recommends the same criteria for the reliability related tasks should apply to new tasks and therefore the R2.1 criteria should be given the same consideration for a Moderate VSL when an entity failed to verify new tasks for 5% or less of its System Operators, High for over 5% to 10%, and Severe for over 10%. Those changes would align the new task verification with existing task verification which provides more consistency within the overall requirement. Implementing new or changes in existing tasks should not be given a higher VSL than those reliability related tasks that already exist and are assigned a graduated VSL. TOP-006-2 R3 Oncor does not support the distribution percentages as outlined in the new VSL. If the reliability objective is to ensure all operations personnel have access to every relay setting on every relay on an entity's area, then the lower percentages would be warranted. However, with fewer than 100 IEEE Device Numbers, there is a very small population of "appropriate technical information concerning protective relaying." Currently, IEEE has only 94 relay types identified and not all of those relays are utilized in the ERCOT system. If an entity failed to provide technical information for just one type of relay, the Lower VSL would never be reached, and the lowest possible VSL with the new percentages would be a moderate VSL. Oncor recommends keeping the current (5%, 10%, and 15%) VSL percentages.

Individual

Tony Kroskey

Brazos Electric Power Cooperative

Agree

ACES Power Marketing

Individual

Molly Devine

Idaho Power Co.

Yes

Additionally for FAC-008, FAC-009, and VAR standards.

Individual

Don Schmit

Nebraska Public Power District

Agree

MRO NSRF (Midwest Reliability Organization - NERC Standards Review Forum)

Group

ACES Power Marketing Standards Collaborators

Ben Engelby

No

(1) General comments: We agree with NERC's effort to fix the typographical errors contained in the VSLs and to roll up subrequirements to the main requirement. However, we found several issues contained in the VSLs that NERC needs to address. Our comments on these issues are below. (2) Paragraph 81 candidates. The following requirements were included in the VSL Filing One or Filing Two that have "N/A" in the Lower, Moderate, High and Severe VSL categories and should be included in the P81 project for retirement. If these requirements do not have severity levels, then it can be assumed that these requirements have little or no impact to Bulk Electric System reliability. The P81 candidates include: BAL-001-0.1a R4, EOP-004-1 R1, EOP-004-1 R4, EOP-004-1 R5, FAC-003-1 R4, IRO-001-1.1 R1, and MOD-016-1.1 R2. (3) BAL-003-0.1b R2: The rationale for increasing the VSL from Lower to Moderate for R2 is that calculating Frequency Bias Setting is a Guideline 1 issue. Please explain how this Guideline 1 warrants escalating the VSL from Lower to Moderate. How exactly will the historical level of compliance be lowered with a Lower VSL? We believe that calculating Frequency Bias Setting is an administrative task and should remain as a Lower VSL to ensure consistency in the determination of penalties. (4) BAL-005-0.1b R14: The additional language to the Severe VSL could be divided among the Lower, Moderate and High VSLs instead of just Severe. The responsible entity could have a Lower VSL for failing to provide tools to monitor control performance and generation response, but not after-the-fact analysis. Moderate could also be a combination of having some tools but not all. NERC should revise the VSL to ensure consistency with the corresponding requirement. This would still satisfy FERC's concerns and provide more consistent application and determination of penalties. (5) EOP-005-2 R11: The changes to the percentages will result in inconsistent determination of penalties. In the prior version of the VSL, 25% of operating personnel was acceptable for Lower VSL and the revision now makes it a Severe VSL. There are no specific justifications why NERC chose these percentages, and there is no reference in the FERC Order on VSLs that state the maximum percentage should be 15%. In large companies, 15% could amount to dozens of personnel, where in a small entity, 15% of operating personnel could be a single person or two operators. The prior percentages were reasonable and should remain at those levels. These changes will ensure consistency with the corresponding requirement and ensure uniformity and consistency in the determination of penalties. (6) EOP-005-2 R15: The VSLs are missing a very important word in each category - "known" changes. The timeframe is fine as long as the entity knew about the change to the capabilities of the Blackstart Resource. Penalizing an entity with a Severe VSL for not notifying the TOP within 96 hours of an unknown change is unreasonable. We recommend adding "known" to each category to ensure consistency with the corresponding requirement. (7) FAC-011-2 R3.6: We recommend rolling the sub-requirement R3.6 into the main VSL for Requirement R3. This revision will ensure consistency with the corresponding requirement and ensure uniformity and consistency in the determination of penalties. (8) EOP-006-2 R6: Having a copy of the latest restoration plan is administrative in nature and should be a Lower Risk Requirement for the VRF. R6 is a planning requirement. In regard to the VSL, there are several metrics that could be graduated in this requirement: the amount of time the restoration plan was made available (previous version), the amount of personnel that did/did not have access to the plan, whether the most recent version was available, and whether there was a restoration plan at all. This requirement should have Lower and Moderate VSLs to capture the other aspects of the requirement to be consistent with the corresponding requirement and to ensure consistency in the determination of penalties. (9) EOP-006-2 R9: We agree with NERC and the drafting team that failure to provide training, while important, would not directly lead to instability, separation, or a cascading sequence of failures. Medium risk is appropriate for the VRF. (10) EOP-008-1 R1: The VRF for EOP-008-

1 does not need to match the same VRF for EOP-005-2, because, as NERC mentioned, the two standards do not address the same aspect of operations and are not dependent upon each. There is not an inconsistency to have a Medium VRF for EOP-008-1. The modification of the VSL for R1 is reasonable and consistent with other VSLs. (11) EOP-008-1 R2: We respectfully disagree with the proposed change to the R2 VRF. Having a procedure "available" is much different than the implementation of that procedure. The availability of the procedure should remain a "Lower" risk factor. There are other standards that address the implementation, which are appropriately labeled with elevated risk factors. Furthermore, this requirement appears to meet criteria (i.e. it is administrative) established in Paragraph 81 and would be a candidate for retirement. (12) EOP-008-1 R5: Again, the VRF for EOP-008-1 does not need to match VRF for EOP-005-2 R4, because, as NERC mentioned, the two standards do not address the same aspect of operations and are not dependent upon each. There is not an inconsistency to have a Medium VRF for EOP-008-1. We recommend keeping the VRF as is. Furthermore, this requirement appears to meet criteria (i.e. it is administrative, periodic update) established in Paragraph 81 and would be a candidate for retirement. (13) EOP-008-1 R6: We agree that no change to the VRF is needed. The modification of the VSL for R6 is reasonable and consistent with other VSLs. (14) EOP-008-1 R7: We agree that no change to the VRF is needed. No comments on VSL – errata change. (15) FAC-010-2.1 R2: We agree that no change to the VSL is needed and support the "rolling up" of sub-requirements into the main requirement. (16) FAC-011-2 R4: We agree with the errata change (deleting "not" in Lower VSL) that was made for consistency. However, we have concerns regarding why NERC changed the starting time to 10 days. When entities must coordinate with other entities, such as Planning Authorities and Transmission Planners in R4.2, delays may occur. It is a more reasonable approach to allow up to 30 days to remain a Lower VSL and then graduate the Moderate, High and Severe after that baseline as the previous draft had stated. We recommend no change on this VSL. (17) MOD-004-1 R3: We respectfully disagree with changing the VRF from Lower to Medium. In the compliance filings, NERC stated that R3 was balloted and approved by industry stakeholders with a Lower VRF and complying with this requirement will "aid in the establishment of an appropriate CBM, but it is not the only source of information from which the appropriate level of CBM may be derived. Additionally, entities are not required to use CBM" and many have chosen not to as a result. If the requirement did not meet the threshold at the time of filing, it should not meet the elevated threshold now. We suggest keeping Requirement R3 as a Lower VRF. (18) MOD-004-1 R4: We respectfully disagree with changing the VRF from Lower to Medium. In the compliance filings, NERC stated that R4 was balloted and approved by industry stakeholders with a Lower VRF and complying with this requirement will "aid in the establishment of an appropriate CBM, but it is NOT the only source of information from which the appropriate level of CBM may be derived. Additionally, entities are NOT required to use CBM" and many have chosen not to as a result. If the requirement did not meet the threshold at the time of filing, it should not meet the elevated threshold now. We suggest keeping Requirement R4 as a Lower VRF. (19) MOD-028-1 R8: We agree that no changes to the VSLs are needed. (20) MOD-028-1 R9: We agree that no changes to the VSLs are needed. (21) MOD-029-1a R5: We agree that no changes to the VSLs are needed. (22) MOD-029-1a R6: We agree that no changes to the VSLs are needed. (23) PER-005-1 R1: While we understand that FERC believes that requirement commingles two requirements, one of having the plan and another of implementing it, we disagree with the outcome to elevate the VRF from Medium to High. This standard is to implement a systematic approach to training, which does not have a direct impact on Bulk Electric System reliability. We agree that each system operator must be competent for the job role in which they perform, but not having a formal systematic approach to training will not directly cause separation, blackouts or cascading outages. We recommend keeping the VRF for R1 at Medium. For the R1 VSL, we agree with the errata changes. However, there is enough language in the requirement to add a Lower VSL for R1. Even FERC recognized that there are lower level administrative tasks as part of R1, which should be in the Lower VSL category. We recommend revising the VSL and replacing the "N/A" with a lower-level violation, such as failing to document or having incomplete documentation for training that was delivered. (24) PER-005-1 R2: We believe that there should be graduated timelines for the R2 VSL. For instance, the Severe VSL is over six months, but could be revised to be over nine months, the High VSL could be eight to nine months, Moderate could be seven to eight months, and the Lower could be six to seven months. This revision would ensure consistency with the applicable requirement and other requirements with time-based VSLs and in the determination of penalties. (25) PER-005-1 R3: We recommend Requirement R3 should have higher percentages to account for smaller entities, such as below 25%, 25%-50%, 50%-75%, and above 75% of personnel trained. In a smaller entity, one person could amount to more than 15% of applicable staff, which would result in a Severe VSL. To ensure consistent application to entities large and small, we recommend adjusting the percentages accordingly. (26) TOP-006-2 R2: We recommend Requirement R2 should have higher percentages than the proposed modifications, such as below 3%, 3%-5%, 5%-10%, and above 10% of the applicable elements. FERC's comment may be true for a large entity, but in a smaller entity, the change in percentages could result in a disproportionate penalty. To ensure consistent application to entities large and small, we recommend adjusting the percentages accordingly. (27) TOP-006-2 R3: There should not be percentages in this Requirement. How can someone determine that an entity was 5% less than "appropriate" amount of technical information it provided to its operating personnel? Appropriate could be any reasonable level of technical information and this VSL is too subjective to determine the sufficient amount. This is an inadequate metric and the VSL needs to be rewritten to ensure consistency in the determination of penalties. (28) Thank you for the opportunity to comment.