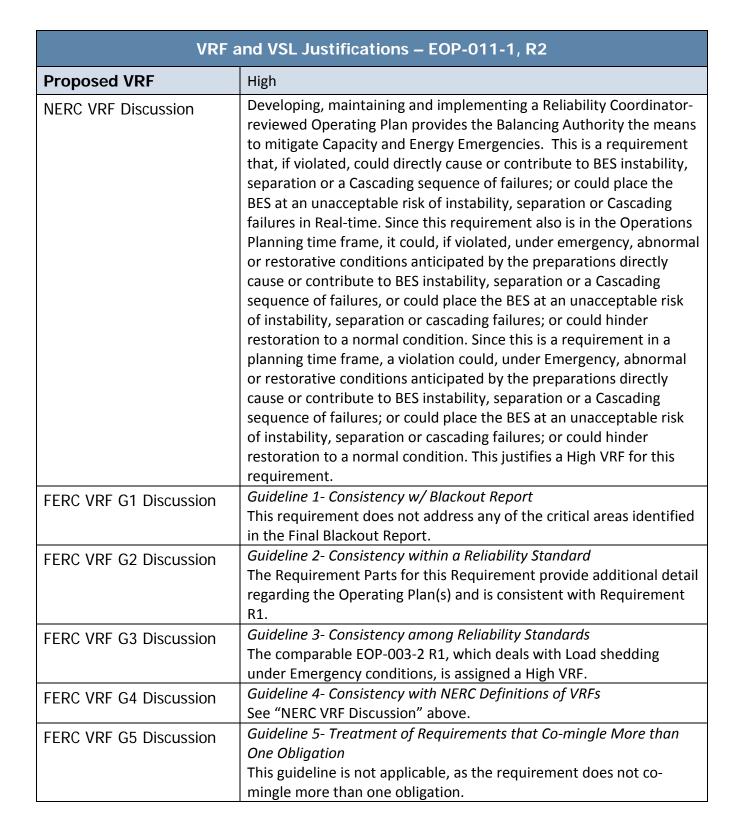


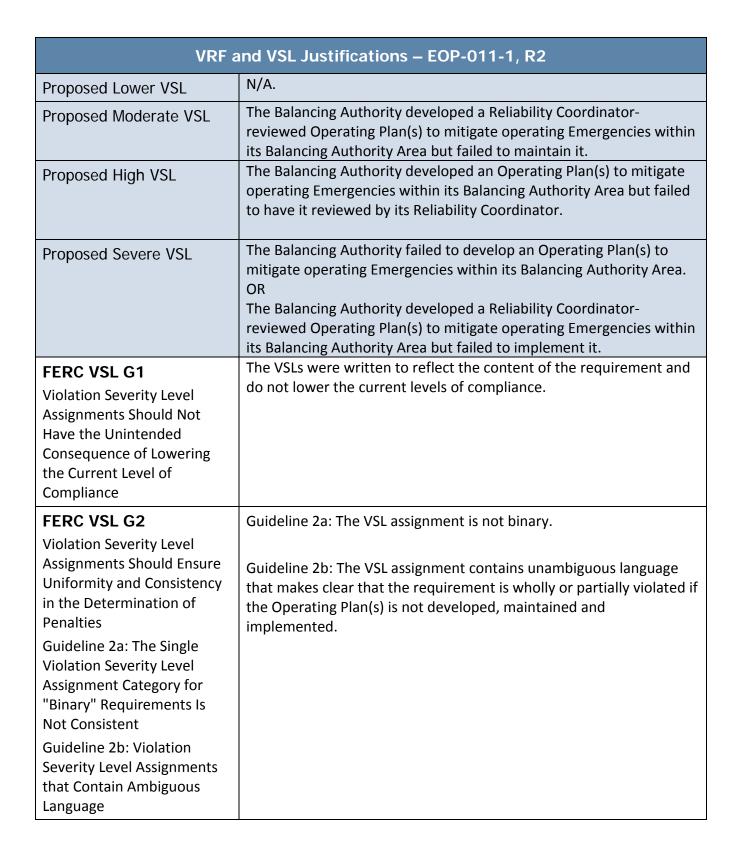
Project 2009-03: Emergency Operations VRF and VSL Justifications for EOP-011-1

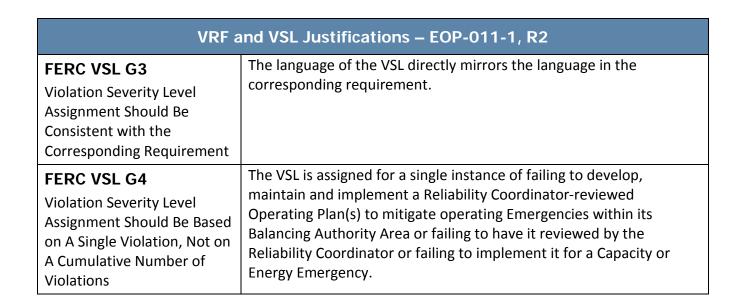
Proposed VRF	High
NERC VRF Discussion	Developing, maintaining and implementing a Reliability Coordinator-reviewed Operating Plan to provide the Transmission Operator the means to mitigate operating Emergencies in its
	Transmission Operator Area. This is a requirement that, if violated, could directly cause or contribute to Bulk Electric System (BES) instability, separation or a Cascading sequence of failures; or could place the BES at an unacceptable risk of instability, separation or Cascading failures in Real-time. Since this requirement also is in the Operations Planning time frame, it could, if violated, under Emergency, abnormal or restorative conditions anticipated by the
	preparations directly cause or contribute to BES instability, separation or a Cascading sequence of failures; or could place the BES at an unacceptable risk of instability, separation or Cascading
	failures; or could hinder restoration to a normal condition. Since this is a Requirement in a planning time frame, a violation could, under Emergency, abnormal or restorative conditions anticipated
	by the preparations directly cause or contribute to BES instability, separation or a Cascading sequence of failures, or could place the BES at an unacceptable risk of instability, separation or Cascading failures; or could hinder restoration to a normal condition. This justifies a High VRF for this requirement.
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report This requirement does not address any of the critical areas identified in the Final Blackout Report.
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard The Requirement Parts for this Requirement provide additional detail regarding the Operating Plan(s) and is consistent with Requirement R2.
FERC VRF G3 Discussion	<i>Guideline 3- Consistency among Reliability Standards</i> The comparable EOP-003-2 R1, which deals with Load shedding under Emergency conditions, is assigned a High VRF.
FERC VRF G4 Discussion	<i>Guideline 4- Consistency with NERC Definitions of VRFs</i> See "NERC VRF Discussion" above.

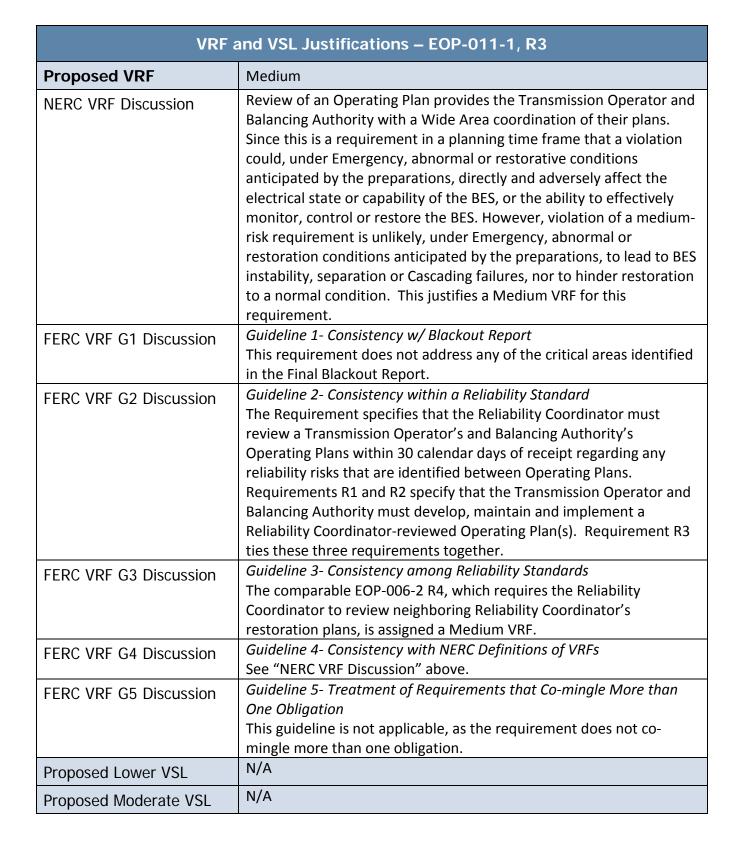
VRF and VSL Justifications – EOP-011-1, R1	
FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation This guideline is not applicable, as the requirement does not co- mingle more than one obligation.
Proposed Lower VSL	N/A
Proposed Moderate VSL	The Transmission Operator developed a Reliability Coordinator- reviewed Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area but failed to maintain it.
Proposed High VSL	The Transmission Operator developed an Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area but failed to have it reviewed by its Reliability Coordinator.
Proposed Severe VSL	The Transmission Operator failed to develop an Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area. OR The Transmission Operator developed a Reliability Coordinator- reviewed Operating Plan(s) to mitigate operating Emergencies in its Transmission Operator Area but failed to implement it.
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The VSLs were written to reflect the content of the requirement and do not lower the current levels of compliance.
FERC VSL G2 Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent	Guideline 2a: The VSL assignment is not binary. Guideline 2b: The VSL assignment contains unambiguous language that makes clear that the requirement is wholly or partially violated if the Operating Plan(s) is not developed, maintained and implemented.

VRF and VSL Justifications – EOP-011-1, R1	
Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	
FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	The language of the VSL directly mirrors the language in the corresponding requirement.
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	The VSL is assigned for a single instance of failing to develop, maintain and implement a Reliability Coordinator-reviewed Operating Plan(s) to mitigate operating Emergencies in its Transmission Operating Area, failing to have it reviewed by its Reliability Coordinator, or failing to implement it for an Operating emergency.







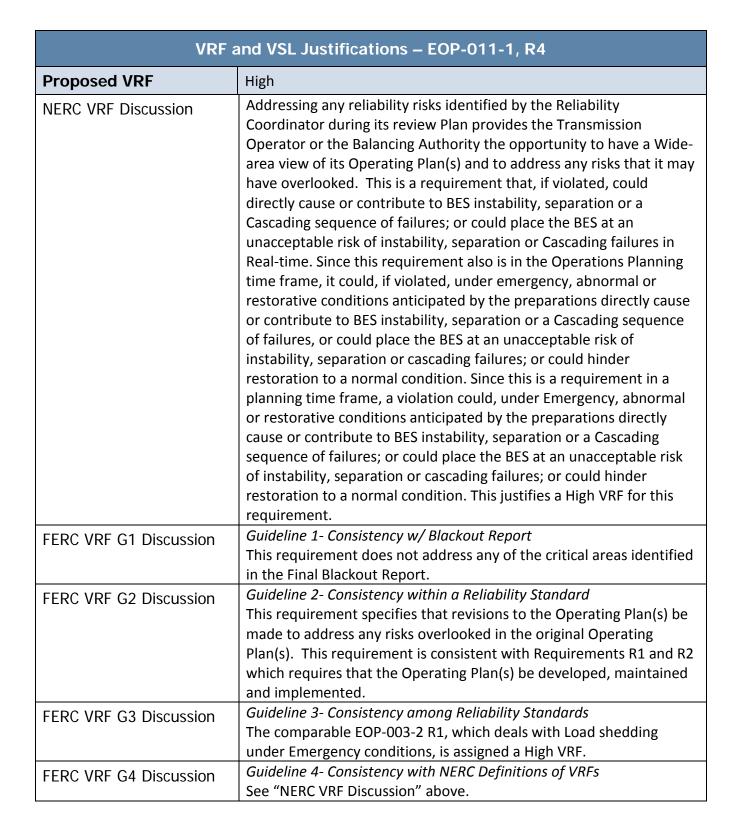


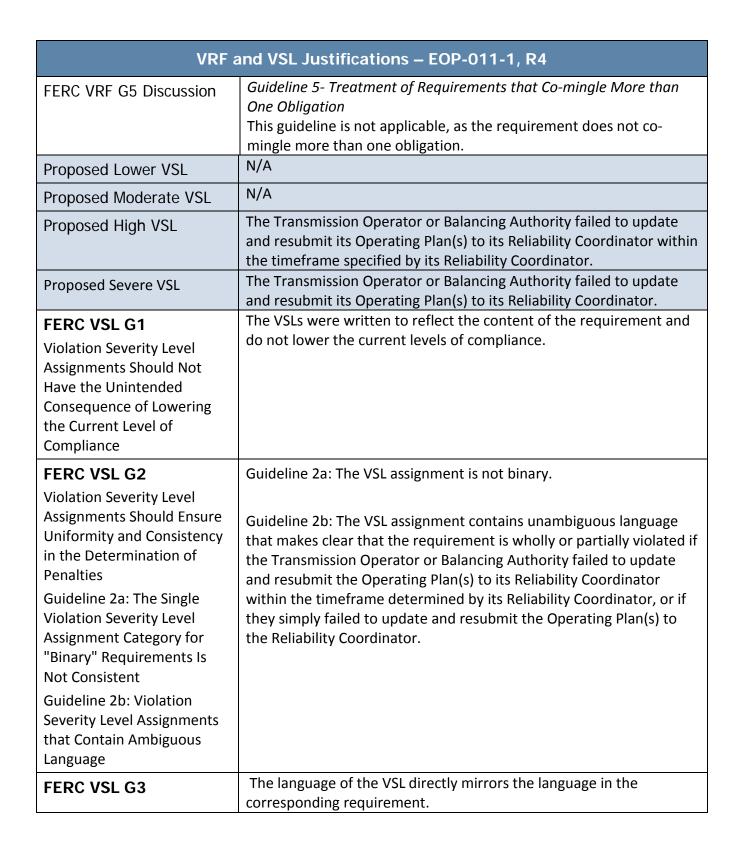


VRF and VSL Justifications – EOP-011-1, R3	
Proposed High VSL	The Reliability Coordinator identified a reliability risk but failed to notify the Balancing Authority or Transmission Operator within 30 calendar days.
Proposed Severe VSL	The Reliability Coordinator identified a reliability risk but failed to notify the Balancing Authority or Transmission Operator
FERC VSL G1 Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance	The VSLs were written to reflect the content of the requirement and do not lower the current levels of compliance.
FERC VSL G2	Guideline 2a: The VSL assignment is not binary.
Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties Guideline 2a: The Single Violation Severity Level Assignment Category for "Binary" Requirements Is Not Consistent Guideline 2b: Violation Severity Level Assignments that Contain Ambiguous Language	Guideline 2b: The VSL assignment contains unambiguous language that makes clear that the requirement is wholly or partially violated if the Reliability Coordinator failed to review a Transmission Operator and Balancing Authority Operating Plans that it received regarding any reliability risks that are identified between Operating Plans within the specified time frame.
FERC VSL G3 Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	The language of the VSL directly mirrors the language in the corresponding requirement.
FERC VSL G4 Violation Severity Level Assignment Should Be Based	The VSL is assigned for a single instance of failing to review a Transmission Operator and Balancing Authority Operating Plans that it received regarding any reliability risks that are identified between Operating Plans within the specified time frame.



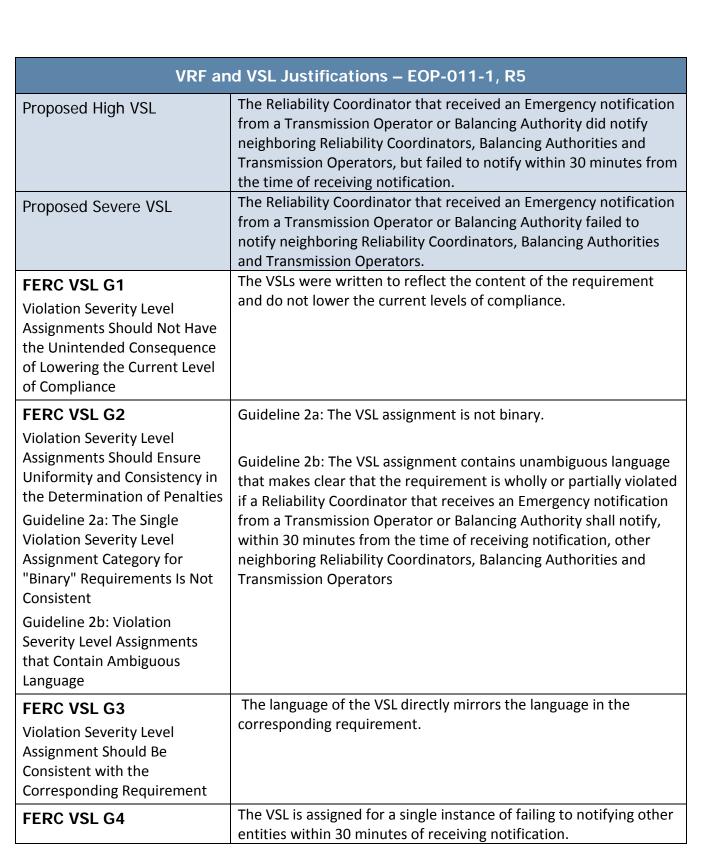
VRF and VSL Justifications – EOP-011-1, R3	
on A Single Violation, Not on A Cumulative Number of Violations	





VRF and VSL Justifications – EOP-011-1, R4	
Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement	
FERC VSL G4 Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	The VSL is assigned for a single instance of failure to update and resubmit the Operating Plan(s) to its Reliability Coordinator within the timeframe determined by the Reliability Coordinator, or if they simply failed to update and resubmit the Operating Plan(s) to its Reliability Coordinator.

VRF and VSL Justifications – EOP-011-1, R5	
Proposed VRF	High
NERC VRF Discussion	Notifying Balancing Authorities and Transmission Operators in its Reliability Coordinator Area, and neighboring Reliability Coordinators of an Emergency helps other entities have proper situational awareness and allows them the opportunity to implement measures to mitigate the Emergency. This is a requirement that, if violated, could directly cause or contribute to BES instability, separation or a Cascading sequence of failures; or could place the BES at an unacceptable risk of instability, separation or Cascading failures in Real-time. This justifies a High VRF for this requirement.
FERC VRF G1 Discussion	Guideline 1- Consistency w/ Blackout Report This requirement does not address any of the critical areas identified in the Final Blackout Report.
FERC VRF G2 Discussion	Guideline 2- Consistency within a Reliability Standard The Requirement specifies that the Reliability Coordinator that receives an Emergency notification from a Transmission Operator or Balancing Authority shall notify, within 30 minutes from the time of receiving notification, other Balancing Authorities and Transmission Operators in its Reliability Coordinator Area, and neighboring Reliability Coordinators. This relates to Requirements R1 and R2, whereby the Transmission Operator and the Balancing Authority implement their Operating Plans. These Requirements are all assigned a High VRF.
FERC VRF G3 Discussion	Guideline 3- Consistency among Reliability Standards The comparable EOP-011-1 Requirements R1, Part 1.2.1 and Requirement R2, Part 2.2, are assigned a High VRF.
FERC VRF G4 Discussion	<i>Guideline 4- Consistency with NERC Definitions of VRFs</i> See "NERC VRF Discussion" above.
FERC VRF G5 Discussion	Guideline 5- Treatment of Requirements that Co-mingle More than One Obligation This guideline is not applicable, as the requirement does not co- mingle more than one obligation.
Proposed Lower VSL	N/A
Proposed Moderate VSL	N/A





VRF and VSL Justifications – EOP-011-1, R5	
Violation Severity Level Assignment Should Be Based on A Single Violation, Not on A Cumulative Number of Violations	

