

**RSSC Members: Expedited Ballot Period for Supplemental Violation Risk Factors (VRFs)**

Please review the attached information from NERC – The ballot window for the supplemental Violation Risk Factors (VRFs) for some of the requirements in certain standards, is open until 8 p.m. (EDT) Saturday, April 21, 2007:

**Background:** Violation Risk Factors play an important role in the assessment of non-compliance levels and associated sanctions. VRFs for Version 0 and Version 1 standards were balloted and approved previously. However, it was noticed that a handful of requirements for certain standards were missing these crucial risk factors. Hence NERC, through its Urgent Action Process, is following an expedited schedule for the balloting of the remaining VRFs “Supplemental Violation Risk Factors”.

**IESO Position:** Though there are some requirements for which the NERC established VRFs could be argued upon, the IESO plans to vote in the AFFIRMATIVE for the entire set.

Please let us know if you need additional information or clarification on the subject matter.

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**Sent:** April 16, 2007 9:26 AM

**Subject:** Announcement: Standards Ballot Window Open - Supplemental Version 1 Violation Risk Factors April 16-21, 2007

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**Maureen E.Long**  
Standards ProcessManager



April 16, 2007

TO: REGISTERED BALLOT BODY

Ladies and Gentlemen:

**Announcement: Standards Ballot Window Open — Supplemental Version 1 Violation Risk Factors April 16–21, 2007**

**The Standards Committee (SC) announces the following standards action:**

**Expedited Ballot Window Open for Supplemental Version 1 Violation Risk Factors**

The [ballot](#) window (six days) for the [Supplemental V1 Violation Risk Factors](#) for some of the requirements in the following standards is open until 8 p.m. (EDT) Saturday, April 21, 2007:

- COM-002-2 — Communication and Coordination
- FAC-003-1 — Transmission Vegetation Management Program
- FAC-010-1 — System Operating Limits Methodology for the Planning Horizon
- FAC-014-1 — Establish and Communicate System Operating Limits
- PRC-005-1 — Transmission and Generation Protection System Maintenance and Testing

NERC staff discovered that some requirements in some of the approved Version 1 standards were not assigned violation risk factors. To correct this error, violation risk factors were drafted for those requirements associated with standards that are expected to become enforceable in June 2007. Because violation risk factors are proposed for use when determining a penalty or sanction for a violation of the associated requirement and need to be “in place” and ready for use in June 2007, the Standards Committee authorized use of the Urgent Action process in the *Reliability Standards Development Procedure*.

If a recirculation ballot is needed, it will also follow an expedited schedule and will be conducted from Monday, April 23, 2007 through Friday, April 27, 2007. This expedited schedule will complete the balloting in time to submit the violation risk factors to the NERC Board of Trustees for consideration during its May 2, 2007 meeting.

**Standards Development Process**

The [Reliability Standards Development Procedure](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate. If you have any questions, please contact me at 813-468-5998 or [maureen.long@nerc.net](mailto:maureen.long@nerc.net).

Sincerely,

***Maureen E. Long***

cc: Registered Ballot Body Registered Users  
Standards Mailing List  
NERC Roster