

Standard 100 – Coordinate Operations

These definitions will be posted and balloted along with the standard, but will not be restated in the standard. Instead, they will be included in a separate “Definitions” document containing definitions relevant to all standards that NERC develops.

DEFINITIONS

- 1. Operating Procedure** – A document that identifies specific steps or tasks that must be taken by one or more specific operating positions to achieve a single specific operating goal. The steps in an Operating Procedure must be followed in the order in which they are presented, and must be performed by the position(s) identified. A document that lists the specific steps to take in removing a specific transmission line from service is an example of an Operating Procedure.
- 2. Operating Process** – A document that identifies general steps for achieving a generic operating goal. An Operating Process includes steps with options that may be selected depending upon real-time conditions. A guideline for controlling high voltage is an example of an Operating Process.
- 3. Operating Plan**- A document that identifies a group of activities that may be used to achieve some goal. An Operating Plan may contain Operating Procedures and Operating Processes. A company-specific system restoration plan that includes an Operating Procedure for black-starting units, Operating Processes for communicating restoration progress with other entities, etc., is an example of an Operating Plan.
- 4. Operating Scenario** – An operating contingency that if left untended, could have an adverse impact that extends beyond the boundaries of a single Reliability Authority Area.
- 5. Outage** – The planned or unplanned removal of equipment from service.

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100 — COORDINATE OPERATIONS

- 101 Procedures
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Purpose: To ensure that each Reliability Authority's operations are coordinated such that they will not have an adverse impact on the reliability of other Reliability Authorities and to preserve the reliability benefits of interconnected operations.

Effective Period: This standard shall become effective upon the date of NERC Board of Trustees adoption.

Applicability: This standard applies to entities performing various electric system functions, as identified in the version 2 of NERC's Functional Model. NERC is now developing standards and procedures for the identification and certification of such entities. Until that identification and certification is complete, these standards apply to the existing entities (such as control areas, transmission owners and operators, and generation owners and operators) that are currently performing the defined functions.

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101 Procedures

(a) Requirements

- (1) The Reliability Authority shall have Operating Procedures, Processes, or Plans in place for activities that require notification, exchange of information or coordination of actions with one or more other Reliability Authorities to support Interconnection reliability. These Operating Procedures, Processes or Plans shall include documents the Reliability Authority has developed, as well as Operating Procedures, Processes or Plans developed by other Reliability Authorities.
- (2) Each Reliability Authority's Operating Procedures, Processes or Plans shall be approved by all the Reliability Authorities required to make notifications, exchange information, or coordinate actions as part of that Operating Procedure, Process or Plan and shall be distributed to all Reliability Authorities that are expected to make a notification, exchange information or coordinate actions as part of that document.
- (3) Reliability Authority Operating Procedures, Processes, and Plans shall collectively address:
 - (i) Identified normal and emergency system conditions that require making notifications to other Reliability Authorities, exchanging information with other Reliability Authorities or the coordination of actions with other Reliability Authorities.
 - (ii) Identified operating scenarios within one Reliability Authority Area that could have an adverse impact on another Reliability Authority's Area.
 - (iii) Activities that require notifying other Reliability Authorities, exchanging reliability-related information with other Reliability Authorities or coordinating actions between Reliability Authorities:
 - (A) Daily communications and real time notifications, including the conditions under which one Reliability Authority notifies other Reliability Authorities; the process to follow in making those notifications; and the data and information to be exchanged with other Reliability Authorities.
 - (B) Resolution of energy and capacity shortages
 - (C) Exchange of planned or unplanned outage information
 - (D) System restoration
 - (E) Voltage control
 - (F) Coordination of information exchange to support reliability assessments
- (4) For each Operating Procedure, Process or Plan developed by another Reliability Authority, each Reliability Authority that receives a copy may develop a company-specific Operating Procedure, Process or Plan to support the source document. If a company-specific version of an Reliability Authority to Reliability Authority Operating Procedure, Process or Plan is developed, the company-specific version shall:
 - (i) Include a reference to the associated Reliability Authority to Reliability Authority Operating Procedure, Process or Plan.
 - (ii) Support the agreed-upon actions from the associated Reliability Authority to Reliability Authority Operating Procedure, Process or Plan.
- (5) The Reliability Authority shall have a document change control procedure for obtaining document approvals from other Reliability Authorities, and for maintaining

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and distributing the Operating Procedures, Processes and Plans authored by that Reliability Authority.

- (i) The Reliability Authority shall follow its document change control Procedure in obtaining approvals and in maintaining and distributing Operating Procedures, Processes or Plans it has developed to support reliability that require notifications, the exchange of information or the coordination of actions between Reliability Authorities.

(b) Measures

- (1) The Reliability Authority's system operators shall have the latest approved version of Operating Procedures, Processes or Plans for identified normal and emergency system conditions that require notifications, the exchange of information or the coordination of actions between Reliability Authorities available for real-time use.
- (2) The Reliability Authority's system operators shall have the latest approved version of Operating Procedures, Processes or Plans for identified operating scenarios that could have an adverse impact on another Reliability Authority's Area available for real-time use.
- (3) The Reliability Authority's system operators shall have available for real-time use, the latest approved version of Operating Procedures, Processes, or Plans that require notifications, information exchange or the coordination of actions between Reliability Authorities. These Operating Procedures, Processes, or Plans shall address:
 - (i) Daily communications and real time notifications, including the conditions under which one Reliability Authority notifies other Reliability Authorities; the process to follow in making those notifications; and the data and information to be exchanged with other Reliability Authorities
 - (ii) Resolution of energy and capacity shortages
 - (iii) Exchange of planned or unplanned outage information
 - (iv) System restoration
 - (v) Voltage control
 - (vi) Coordination of information exchange to support reliability assessments
- (4) If a company-specific version of an Operating Procedure, Process or Plan was developed to support a source document received from another Reliability Authority, then the company-specific version shall be available to the Reliability Authority's system operators for real-time use, shall include a reference to the associated source document, and shall include additional details to support the agreed-upon actions identified in the source document.
- (5) The Reliability Authority shall have a document change control Procedure that addresses obtaining the approval of all Reliability Authorities required to act as part of one of its Operating Procedures, Processes or Plans that involve notification, exchange of information or coordination of actions with one or more other Reliability Authorities. This document change control procedure shall address maintenance and distribution of these Operating Procedures, Processes or Plans.
- (6) The Reliability Authority shall have evidence that it followed its document change control procedure in obtaining approval from all Reliability Authorities required to

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take action as part of an Operating Procedure, Process or Plan and in maintaining and distributing its Operating Procedures, Processes and Plans.

(c) Regional Differences

None identified.

(d) Compliance Monitoring Process

- (1) The Reliability Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually. The self-certification shall include a list of the latest approved version of documents distributed to other Reliability Authorities that address the following:
 - (i) Identified normal and emergency system conditions that require making notifications to other Reliability Authorities, exchanging information with other Reliability Authorities or the coordination of actions with other Reliability Authorities.
 - (ii) Identified operating scenarios within one Reliability Authority Area that could have an adverse impact on another Reliability Authority's Area.
 - (iii) Daily communications and real time notifications, including the conditions under which one Reliability Authority notifies other Reliability Authorities; the process to follow in making those notifications; and the data and information to be exchanged with other Reliability Authorities.
 - (iv) Resolution of energy and capacity shortages.
 - (v) Exchange of planned or unplanned outage information.
 - (vi) System restoration.
 - (vii) Voltage control.
 - (viii) Coordination of information exchange to support reliability assessments.
- (2) The self-certification shall also include a list of the latest version of company-specific Operating Procedures, Processes or Plans developed to support a source Operating Procedure, Process or Plan received from another Reliability Authority.
- (3) The Compliance Monitor shall also use an annual spot check with 3 business days' notice, or sufficient time to comply with the control center's security access procedure. As part of the spot check, the Compliance Monitor shall interview other Reliability Authorities to:
 - (i) Verify that the Document Change Control Procedure has been followed.
 - (ii) Identify Operating Procedures, Processes or Plans that were distributed to the Reliability Authority being audited to verify that these documents are available for real-time use by the receiving Reliability Authority's system operators.
- (4) The Compliance Monitor shall conduct an investigation upon a complaint that is received within 30 days of the alleged infraction's discovery date. The Compliance Monitor shall complete the investigation and report back to all involved Reliability Authorities (the Reliability Authority that complained as well as the Reliability Authority that was investigated) within 45 days after the start of the investigation. The results of the spot check shall be assessed and returned to the Reliability Authority within 30 days of the date of the spot check.

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- (5) The performance-reset period shall be one calendar year. The reliability authority shall keep documentation for prior year and current calendar year. The Compliance Monitor shall keep compliance data for a minimum of 3 years or until the Reliability Authority has achieved full compliance — whichever is longer.
- (6) The Reliability Authority shall have the following documents available for the Compliance Monitor's inspection:
 - (i) The latest version of its Operating Procedures, Processes or Plans that address the following:
 - (A) Identified normal and emergency system conditions that require the exchange of information or the coordination of actions between Reliability Authorities.
 - (B) Identified operating scenarios within one Reliability Authority Area that could have an adverse impact on another Reliability Authority's Area.
 - (ii) Activities that require coordination between Reliability Authorities:
 - (A) Daily communications and real-time notifications, including the conditions under which one Reliability Authority notifies other Reliability Authorities; the process used for such notifications; and the data and information to be exchanged
 - (B) Resolution of energy and capacity shortages
 - (C) Exchange of planned or unplanned outage information
 - (D) System restoration
 - (E) Voltage control
 - (F) Coordination of information exchange to support reliability assessments
 - (iii) The latest copy of its Document Change Control Procedure
 - (iv) Evidence that its Operating Procedures, Processes or Plans were approved, updated and distributed in accordance with its Document Change Control Procedure.

(e) Levels of Noncompliance

- (1) **Level One:** Up to 10% of the latest approved version (identified through self-certification) of Operating Procedures, Processes or Plans it has developed or received from other Reliability Authorities that include Reliability Authority to Reliability Authority notification, exchange of information or coordination of actions were either:
 - (i) Not available for real-time system operator use, or
 - (ii) Missing required approvals, or
 - (iii) Had no evidence of being updated according to the Document Change Control Procedure, or
 - (iv) Had no evidence of being distributed to the other Reliability Authorities that were required to make notifications, exchange information or coordinate actions as part of that document

OR

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Up to 10% of the latest approved version (identified through self-certification) of company-specific Operating Procedures, Processes or Plans developed to support an Operating Procedure, Process or Plan developed by another Reliability Authority were either:

- (i) Not available for real-time system operator use, or
- (ii) Missing a reference to the associated source document, or
- (iii) Didn't support the agreed-upon actions identified in the source document.

(2) **Level Two:** There shall be a level two noncompliance if either of the following conditions exist:

- (i) Operating Procedures, Processes or Plans (identified through self-certification) addressed only five of the following topics:
 - (A) Daily communications and real time notifications
 - (B) Resolution of energy and capacity shortages
 - (C) Exchange of planned or unplanned outage information
 - (D) System restoration
 - (E) Voltage control
 - (F) Coordination of information exchange to support reliability assessments

OR

- (ii) Between 11 and 20% of the latest approved version (identified through self-certification) of Operating Procedures, Processes or Plans it has developed or received from other Reliability Authorities that include Reliability Authority to Reliability Authority notification, exchange of information or coordination of actions were:
 - (A) Not available for real-time system operator use, or
 - (B) Missing required approvals, or
 - (C) Had no evidence of being updated according to the Document Change Control Procedure, or
 - (D) Had no evidence of being distributed to the other Reliability Authorities that were required to make notifications, exchange information or coordinate actions as part of that document

OR

- (iii) Between 11 and 20% of the latest approved version (identified through self-certification) of company-specific Operating Procedures, Processes or Plans developed to support an Operating Procedure, Process of Plan developed by another Reliability Authority were either:
 - (A) Not available for real-time system operator use, or
 - (B) Missing a reference to the associated source document, or
 - (C) Didn't support the agreed-upon actions identified in the source document.

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(2) **Level Three:** There shall be a level three noncompliance if any of the following conditions are present:

- (i) Operating Procedures, Processes or Plans (identified through self-certification) addressed only four of the following topics:
 - (A) Daily communications and real time notifications
 - (B) Resolution of energy and capacity shortages
 - (C) Exchange of planned or unplanned outage information
 - (D) System restoration
 - (E) Voltage control
 - (F) Coordination of information exchange to support reliability assessments

OR

- (ii) Between 21 and 30% of the latest approved version (identified through self-certification) of Operating Procedures, Processes or Plans it has developed or received from other Reliability Authorities that include Reliability Authority to Reliability Authority notification, exchange of information or coordination of actions were:
 - (A) Not available for real-time system operator use, or
 - (B) Missing required approvals, or
 - (C) Had no evidence of being updated according to the Document Change Control Procedure, or
 - (D) Had no evidence of being distributed to the other Reliability Authorities that were required to make notifications, exchange information or coordinate actions as part of that document

OR

- (iii) Between 21 and 30% of the latest approved versions (identified through self-certification) of company-specific Operating Procedures, Processes of Plans developed to support an Operating Procedure, Process of Plan developed by another Reliability Authority were either:
 - (A) Not available for real-time system operator use, or
 - (B) Missing a reference to the associated source document, or
 - (C) Didn't support the agreed-upon actions identified in the source document.

(3) **Level Four:** There shall be a level four noncompliance if any of the following conditions are present:

- (i) Operating Procedures, Processes or Plans (identified through self-certification) addressed less than four of the following topics:
 - (A) Daily communications and real time notifications
 - (B) Resolution of energy and capacity shortages

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- (C) Exchange of planned or unplanned outage information
- (D) System restoration
- (E) Voltage control
- (F) Coordination of information exchange to support reliability assessments

OR

- (ii) More than 30% of the latest approved version (identified through self-certification) of Operating Procedures, Processes or Plans it has developed or received from other Reliability Authorities that include Reliability Authority to Reliability Authority notification, exchange of information or coordination of actions were:

- (A) Not available for real-time system operator use, or
- (B) Missing required approvals, or
- (C) Had no evidence of being updated according to the Document Change Control Procedure, or
- (D) Had no evidence of being distributed to the other Reliability Authorities that were required to make notifications, exchange information or coordinate actions as part of that document

OR

- (iii) More than 30% of the latest approved versions (identified through self-certification) of company-specific Operating Procedures, Processes or Plans developed to support an Operating Procedure, Process or Plan developed by another Reliability Authority were either:

- (A) Not available for real-time system operator use, or
- (B) Missing a reference to the associated source document, or
- (C) Didn't support the agreed-upon actions identified in the source document.

(f) Sanctions

Sanctions for noncompliance shall be applied consistent with the NERC compliance and enforcement matrix. In places where financial sanctions are applied for noncompliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the dollars per MW sanctions.

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102 Notifications and Information Exchange

(a) Requirement

- (1) The Reliability Authority shall follow its Operating Procedures, Processes or Plans for making notifications and exchanging reliability-related information with other Reliability Authorities.
 - (i) The Reliability Authority shall make notifications to other Reliability Authorities of conditions in its Reliability Authority Area that may impact other Reliability Authority Areas.
 - (ii) The Reliability Authority shall participate in agreed upon daily conference calls and other communication forums.
- (2) The Reliability Authority shall provide reliability related information as requested by other Reliability Authorities.

(b) Measures

- (1) The Reliability Authority shall have evidence it has followed its Operating Procedures, Processes or Plans for notifying other Reliability Authorities of specific conditions in its Reliability Authority Area that may impact other Reliability Authority Areas.
- (2) The Reliability Authority shall have evidence that it participated in agreed upon daily conference calls and other communication forums.
- (3) When questioned by its Compliance Monitor, each Reliability Authority shall identify other Reliability Authorities that have:
 - (i) Notified them of conditions that may impact other Reliability Authority Areas.
 - (ii) Participated with them in daily conference calls and other communication forums.
 - (iii) If requested, provided them with reliability-related information.

(c) Regional Differences

None Identified

(d) Compliance Monitoring

- (1) The reliability authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually. The Compliance Monitor shall also use a scheduled on-site review at least once every three years, spot checks and investigations upon complaint. The Compliance Monitor shall interview other Reliability Authorities within the Interconnection and verify that the Reliability Authority being audited has been making notifications and exchanging reliability-related information according to approved procedures.

The Compliance Monitor shall conduct an investigation upon a complaint that is received within 30 days of the alleged infraction's discovery date. The Compliance Monitor shall complete the investigation within 45 days after the start of the investigation.

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- (2) The compliance-reset period shall be one calendar year. The reliability authority shall keep auditable documentation for a rolling 12 months. The Compliance Monitor shall keep compliance data for a minimum of 3 years or until the Reliability Authority has achieved full compliance — whichever is longer.
- (3) The reliability authority shall have the following available upon the request of its Compliance Monitor:
 - (i) Evidence it has participated in agreed-upon daily conference calls or other communications forums.
 - (ii) Operating logs or other data sources that document notifications made to other Reliability Authorities.

(e) Levels of Noncompliance

- (1) Level one: Not Applicable
- (2) Level two: There shall be a level two noncompliance if any of the following conditions are present:
 - (i) One or more of the Reliability Authorities interviewed by the Compliance Monitor indicated that the Reliability Authority being audited:
 - (A) On one occasion, did not provide notification of conditions that may impact their Reliability Authority Area, or
 - (B) On one occasion, did not provide reliability-related information, as requested
 - OR**
 - (ii) Evidence shows that the Reliability Authority did not participate in up to 5% of the agreed-upon daily conference calls or other communications forums.
- (3) Level three: There shall be a level three noncompliance if any of the following conditions are present:
 - (i) One or more of the Reliability Authorities interviewed by the Compliance Monitor indicated that the Reliability Authority being audited:
 - (A) On two occasions, did not provide notification of conditions that may impact their Reliability Authority Area, or
 - (B) On two occasions, did not provide reliability-related information, as requested
 - OR**
 - (ii) Evidence shows that the Reliability Authority did not participate in 6–10% of the agreed-upon daily conference calls or other communications forums.
- (4) Level four: There shall be a level four noncompliance if any of the following conditions are present:
 - (i) One or more of the Reliability Authorities interviewed by the Compliance Monitor indicated that the Reliability Authority being audited:

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(A) On more than two occasions, did not provide notification of conditions that may impact their Reliability Authority Area, or

(B) On more than two occasion, did not provide reliability-related information, as requested

OR

(ii) Evidence shows that the Reliability Authority did not participate in more than 10% of the agreed-upon daily conference calls or other communications forums.

(f) Sanctions

Sanctions for noncompliance shall be applied consistent with the NERC compliance and enforcement matrix. In places where financial sanctions are applied for noncompliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the dollars per MW sanctions.

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103 Coordination

(a) Requirement

- (1) The Reliability Authority that identifies a potential, expected, or actual problem that adversely impacts the reliability of one or more other Reliability Authorities shall contact the other Reliability Authority(s) to confirm that there is a problem and then discuss options and decide upon a solution to prevent or resolve the identified problem.
 - (i) If the involved Reliability Authorities agree on the problem and the actions to take to prevent or mitigate the problem:
 - (A) Each involved Reliability Authority shall document and implement the agreed-upon solution.
 - (B) Each Reliability Authority shall notify all involved or affected Reliability Authorities of the problem and the action being taken.
 - (ii) If the involved Reliability Authorities cannot agree on the problem or upon agreeing on the problem can not agree on a solution:
 - (A) Each Reliability Authority shall re-evaluate conflicting system status or studies. If time permits, this should be done before taking corrective actions.
 - (B) Each Reliability Authority shall notify all Reliability Authorities in the Interconnection of the potential, expected or actual problem, along with the actions being taken by that Reliability Authority.
 - (C) Each Reliability Authority shall take actions in its own Reliability Area to prevent or minimize adverse effects on Interconnection reliability.

(b) Measures

- (1) The Reliability Authority shall have a list of coordination events it initiated with other Reliability Authorities that contains the date of the event and the names of the Reliability Authorities contacted.
- (2) For each event on its list of coordination events, the Reliability Authority shall have evidence that it contacted other impacted Reliability Authority(s) to coordinate actions to prevent or resolve a potential, expected, or actual problem that adversely impacts the reliability of one or more other Reliability Authorities. Each involved Reliability Authority shall have documentation for the event (operations log or other data source) that includes all of the following:
 - (i) Date and time of information exchanges
 - (ii) Reliability Authority(s) involved in discussion
 - (iii) Description of the reported potential, expected or actual problem
 - (iv) Note to indicate whether problem was agreed upon
 - (v) Solution identified and agreed upon or a note indicating no solution was agreed upon
 - (vi) Date and time actions taken
 - (vii) Description of actions taken
 - (viii) List of notifications made

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- (ix) Results of investigation into conflicting system status or studies
- (3) Other Reliability Authorities within the Interconnection shall verify that the Reliability Authority being audited has coordinated actions to prevent or resolve potential, expected or actual problems that adversely impact one or more other Reliability Authorities.

(c) Regional Differences

None identified.

(d) Compliance Monitoring Process

- (1) The Reliability Authority shall demonstrate compliance through self-certification submitted to its Compliance Monitor annually. The self-certification shall include a list of the prior year's dates on which this Reliability Authority identified a potential, expected, or actual problem that adversely impacted the reliability of one or more other Reliability Authorities and the names of the Reliability Authorities that were contacted. The Compliance Monitor shall also use an annual spot check with 3 business days' notice, or sufficient time to comply with the control center's security access procedure; and investigations upon complaint, to assess performance. The Compliance Monitor shall interview other Reliability Authorities within the Interconnection and verify that the Reliability Authority being audited has been coordinating actions to prevent or resolve potential, expected or actual problems that adversely impact the Interconnection.
- (2) The Compliance Monitor shall conduct an investigation upon a complaint that is received within 30 days of the alleged infraction's discovery date. The Compliance Monitor shall complete the investigation and report back to all involved Reliability Authorities (the Reliability Authority that complained as well as the Reliability Authority that was investigated) within 45 days after the start of the investigation. The results of the spot check shall be assessed and returned to the Reliability Authority within 30 days of the date of the spot check
- (2) The compliance-reset period shall be one calendar year. The reliability authority shall keep auditable documentation for the prior year and current calendar year. The Compliance Monitor shall keep compliance data for a minimum of 3 years or until the Reliability Authority has achieved full compliance — whichever is longer.
- (3) The Reliability Authority shall have the following available upon the request of its Compliance Monitor for:
 - (i) Operating logs or other data sources with the following information for each instance of coordination with another Reliability Authority to agree upon and resolve a potential, expected or actual problem that impacts more than one Reliability Authority Area:
 - (A) Date and time of information exchanges
 - (B) Reliability Authority(s) involved in discussion
 - (C) Description of the reported potential, expected or actual problem
 - (D) Note to indicate whether problem was agreed upon
 - (E) Solution identified and agreed upon or a note indicating no solution was agreed upon
 - (F) Date and time actions taken

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(G) Description of actions taken

(H) List of notifications made

(I) Results of any investigation into conflicting system status or studies

(e) Levels of Non-compliance

(1) Level one: There shall be a level one noncompliance if all of the following conditions are present:

- (i) Less than five events (identified through self-certification of all Reliability Authorities in the Interconnection), did not have all required documentation, and
- (ii) All events did have evidence of being coordinated with other impacted Reliability Authorities, and
- (iii) Each event that involved conflicting system status or studies had documented results to show that there was a re-evaluation of the conflicting system status or studies.

(2) Level two: There shall be a level two noncompliance if all of the following conditions are present:

- (i) More than five events (identified through self-certification of all Reliability Authorities in the Interconnection), did not have all required documentation, and
- (ii) All events did have evidence of being coordinated with other impacted Reliability Authorities, and
- (iii) Each event that involved conflicting system status or studies had documented results to show that there was a re-evaluation of the conflicting system status or studies.

(3) Level three: There shall be a level three noncompliance if either of the following conditions are present:

- (i) One event (identified through self-certification of all Reliability Authorities in the Interconnection), did not have evidence of being coordinated with other impacted Reliability Authorities,

OR

- (ii) One event that involved conflicting system status or studies had no documented results to show that there was a re-evaluation of the conflicting system status or studies

(4) Level four: There shall be a level four noncompliance if either of the following conditions are present:

- (i) More than one event (identified through self-certification of all Reliability Authorities in the Interconnection), did not have evidence of being coordinated with other impacted Reliability Authorities,

OR

- (ii) More than one event that involved conflicting system status or studies had no documented results to show that there was a re-evaluation of the conflicting system status or studies.

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(f) Sanctions

Sanctions for noncompliance shall be applied consistent with the NERC compliance and enforcement matrix. In places where financial sanctions are applied for noncompliance, these penalties shall be the fixed dollar sanctions listed in the matrix, not the dollars per MW sanctions.