

# Notice of Request to Waive the Standard Process

## Project 2013-03 – Geomagnetic Disturbance Mitigation

As required by Section 16 of the NERC [Standard Processes Manual](#) (SPM), this is official notice to stakeholders that the leadership of the Project 2013-03 Geomagnetic Disturbance Mitigation (GMD) Standards Drafting Team, the Project Management and Oversight Subcommittee liaison, the Standards Committee (SC) chair, and NERC Standards staff (Requesters) are requesting that the SC consider a waiver of the SPM. The Requesters ask to shorten the next formal comment and ballot period for draft standard TPL-007-1, and any subsequent formal comment and ballot periods prior to final ballot for that standard, from forty-five days to twenty-five days, with a ballot and non-binding poll during the last seven days of the twenty-five day period, and to shorten the final ballot for TPL-007-1 from ten days to seven days, in order to meet a Federal Energy Regulatory Commission (FERC) regulatory deadline. Section 16 of the SPM provides for the granting of a waiver for a regulatory deadline.

The SC will meet via teleconference to consider this waiver on its regularly scheduled Wednesday, October 22, 2014 call (to comply with the five business days' notice required by Section 16 of the SPM, this notice and its accompanying one-pager were submitted to the SC on October 15, 2014). The SC's teleconference will be noticed through an announcement and posted on the NERC website. Additional details about the waiver request are included below, and should a waiver be granted by the SC, it will be posted on the [project page](#).

### Justification for Current Waiver Request

In Order No. 779, the Commission directed the development of Reliability Standards to address GMDs in two stages.<sup>1</sup> In the first stage, NERC submitted Reliability Standard EOP-010-1, requiring owners and operators of the Bulk-Power System (BPS) to develop and implement Operating Procedures to mitigate the effects of GMDs consistent with the reliable operation of the BPS. The second stage of Reliability Standards to address GMDs, the subject of this waiver request, requires NERC to develop proposed Reliability Standards that require owners and operators of the BPS to conduct initial and ongoing vulnerability assessments of the potential impact of benchmark GMD events on BPS equipment and the BPS as a whole.

FERC directed the submission of the stage two Reliability Standard within 18 months of the effective date of the final rule, *i.e.*, **January 21, 2015**.

TPL-007-1 has been posted for one 30-day informal comment period and two 45-day comment periods and ballots, receiving approval ratings of 55.77% and 57.95%, respectively.

<sup>1</sup> *Reliability Standards for Geomagnetic Disturbances*, Order No. 779, 143 FERC ¶ 61,147 (2013) (“Order No. 779”).

The shortened comment period and ballot for TPL-007-1 serves several important purposes. First, should it be necessary to conduct more than one additional ballot to reach consensus on TPL-007-1, the shortened comment period will allow for one additional comment period and ballot, while still allowing the standard to be filed with the Commission by the January 21, 2015 deadline. This will also enable the drafting team to conduct additional outreach prior to the start of the ballot which may be important to ensure stakeholder support. Shortening the ballot period from ten days to seven days also provides scheduling flexibility that may be required to achieve the necessary milestones including scheduling a special call for NERC Board of Trustees adoption, while still allowing NERC and the industry to successfully meet the filing deadline.

### **Standards Development Process**

The [Standard Processes Manual](#) 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.

*For more information or assistance, please contact Mark Olson,  
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## Waiver Authorization for Project 2013-03 Geomagnetic Disturbance Mitigation

### Action

Authorize a waiver of the Standard Process Manual (SPM) to:

- a) Shorten the next additional formal comment period (and any subsequent additional formal comment periods) for draft standard TPL-007-1—Transmission System Planned Performance for Geomagnetic Disturbance (GMD) Events from forty-five days to twenty-five days, with a ballot and non-binding poll during the last seven days of the twenty-five day period; and
- b) Shorten the final ballot period from ten days to seven days.

### Background

The leadership of the GMD drafting team, NERC Staff, and the Project Management and Oversight Subcommittee liaison and Standards Committee (SC) chair have requested a waiver of the NERC Standards Processes Manual (SPM) as described in the actions above. Section 16 of the SPM provides for the granting of waivers to meet a regulatory deadline. As required in Section 16, NERC provided stakeholders with five business days' notice of this waiver. If a waiver is authorized, NERC will post notice of the waiver and notify the NERC Board of Trustees (Board) Standards Oversight and Technology Committee.

In Order No. 779, the Federal Energy Regulatory Commission (FERC) directed the development of Reliability Standards to address GMDs in two stages.<sup>1</sup> In the first stage, NERC submitted Reliability Standard EOP-010-1, requiring owners and operators of the Bulk-Power System (BPS) to develop and implement Operating Procedures to mitigate the effects of GMDs consistent with the reliable operation of the BPS. In the second stage, which is the subject of this waiver request, NERC is developing a proposed Reliability Standard that requires owners and operators of the BPS to conduct initial and ongoing vulnerability assessments of the potential impact of benchmark GMD events on BPS equipment and the BPS as a whole.

FERC directed the submission of the stage two Reliability Standard within 18 months of the effective date of the final rule, *i.e.*, **January 21, 2015**.

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The shortened comment period and ballot for TPL-007-1 serves several important purposes. First, should it be necessary to conduct more than one additional ballot to reach consensus on TPL-007-1, the shortened comment period will allow for one additional comment period and ballot, while still allowing the standard to be filed with FERC by the January 21, 2015 deadline. This will also enable the drafting team to conduct additional outreach prior to the start of the ballot which may be important to ensure stakeholder support. Shortening the ballot period from ten days to seven days also provides scheduling flexibility that may be required to achieve the necessary milestones including scheduling a special call for NERC Board adoption, while still allowing NERC and the industry to successfully meet the filing deadline.