Unofficial Comment Form

Project 2013-03 Geomagnetic Disturbance Mitigation

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=cc33e237f4da4c86a23cba9a703f8f3d) to submit comments on the Standard. The electronic comment form must be completed by October 10, 2014.

If you have questions please contact Mark Olson at mark.olson@nerc.net or by telephone at 404-446-9760.

All documents for this project are available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-2013-03-Geomagnetic-Disturbance-Mitigation.aspx).

## Background Information

On May 16, 2013 FERC issued [Order No. 779](http://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=13260635), directing NERC to develop Standards that address risks to reliability caused by geomagnetic disturbances in two stages. Project 2013-03 responds to the FERC directives as follows:

* Stage 1. EOP-010-1 – Geomagnetic Disturbance Operations was approved by FERC in June, 2014.
* Stage 2. Proposed standard TPL-007-1 – Transmission System Planned Performance for Geomagnetic Disturbance Events requires applicable entities to conduct assessments of the potential impact of benchmark GMD events on their systems. If the assessments identify potential impacts, the proposed standard will require the applicable entity to develop corrective actions to mitigate the risk of voltage collapse, uncontrolled separation, or Cascading. The Stage 2 standard must be filed with FERC by January 2015.

A draft of TPL-007-1 and supporting white papers were posted for informal comments from June 13 – July 30, 2014. The standard drafting team (SDT) has made several revisions based on stakeholder input.

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

## Questions on Draft TPL-007-1

1. **TPL-007-1**. Do you agree with the changes made to TPL-007-1? If not, please provide a specific recommendation for revisions you could support and justification to support the proposed revisions.

[ ]  Yes

[ ]  No

Comments:

1. **Implementation**. The SDT has revised the proposed Implementation Plan from an overall four-year implementation to five years based on stakeholder comments. Do you agree with the changes made to the Implementation Plan? If not, please provide a specific recommendation and justification.

[ ]  Yes

[ ]  No

Comments:

1. **Violation Risk Factors (VRF) and Violation Severity Levels (VSL)**. The SDT has made revisions to conform with changes to requirements and respond to stakeholder comments. Do you agree with the VRFs and VSLs for TPL-007-1? If you do not agree, please explain why and provide recommended changes.

[ ]  Yes

[ ]  No

Comments:

1. Are there any other concerns with the proposed standard or white papers that have not been covered by previous questions and comments? If so, please provide your feedback to the SDT.

[ ]  Yes

[ ]  No

Comments: