

Response to Comments Project 2018-01 Canadian-specific Revisions to TPL-007-2

Background

NERC received a Standard Authorization Request (SAR) proposing an option for Canadian Registered Entities to leverage operating experience, observed Geomagnetic Disturbance (GMD) effects, and on-going research efforts for defining alternative benchmark GMD events and/or supplemental GMD events specific to their unique topology.

NERC posted the SAR for formal comment period on March 30, 2018, and industry comments significantly supported the SAR as written. The SAR drafting team (SAR DT) reviewed the comments and made clarifying changes regarding the implementation of Corrective Action Plan(s) requiring capital investments.

The SAR DT appreciates all comments in support of the SAR as written as well as any minority or adverse comments provided, the responses to which are below. All comments received can be accessed via the [NERC Standards Balloting & Commenting System](#).

Comment

BPA does not believe an additional benchmark event is needed because the existing standard accounts for latitude, longitude and the earth's conductivity variation adjustments for the benchmark and supplemental benchmark event. BPA believes it is not clear what would be achieved by creating a new benchmark event for Canadian entities since the existing benchmark event is based on the 1989 event that blacked out the Quebec system.

Response

The SAR does not specify that the project will create a new Benchmark GMD Event for Canada. The project will make revisions to allow Canadian Registered Entities to take into account specific data that has been gathered for the range of latitude and longitude in their jurisdiction, as well as the specifics in the earth's conductivity.

Comment

While BPA does not understand the need for the SAR, BPA acknowledges that if the Canadian provinces deem it necessary, there will be no negative impact to the North American interconnected power grid.

Response

The SAR DT contends that any Variance created will meet the reliability objectives of continent-wide standard and adhere to the NERC Standard Processes Manual and the NERC Rules of Procedure.

Comment

The SAR DT agrees with the scope of the SAR. We also recommend the drafting team consider adding review of the revisions made to Requirement 7 in TPL-007-2, specifically R7.3 that introduced fixed timelines for implementation of potential Corrective Action Plans. Requiring fixed timelines for implementing Corrective Action Plans, especially in cases where capital investment maybe required, may not be compatible with existing electricity regulations in Canadian jurisdictions.

Response

The SAR DT agrees that considerations for implementing Corrective Action Plans should be addressed, including a review Requirement R7.