Unofficial Comment Form

Project 2018-01 Canadian-specific

Revisions to TPL-007-2

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on the proposed **TPL-007-3 (Canadian Variance)** **− Transmission System Planned Performance for Geomagnetic Disturbance Events**. The electronic comment form must be completed by **8:00 p.m. Eastern, Thursday, November 15, 2018**.

Documents and information about this project are available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project201801CanadianspecificRevisionstoTPL0072.aspx). If you have questions, contact Standards Developer, [Mat Bunch](mailto:mat.bunch@nerc.net) (via email), or at (404) 446-9785.

## Project Purpose

The purpose of this project is to provide Canadian entities the latitude to leverage operating experience, observed GMD effects, and on-going research efforts for defining alternative Benchmark GMD Events and/or Supplemental GMD Events that appropriately reflect their specific geographical and geological characteristics. This project also addresses regulatory frameworks specific to Canadian jurisdictions.

## Background and Summary

Reliability Standard TPL-007-2 – Transmission System Planned Performance for Geomagnetic Disturbance Events was approved by industry in 2017 and filed with the Federal Energy Regulatory Commission on January 22, 2018 and the Canadian authorities on February 27, 2018. On June 13, 2018, the Standards Committee approved a SAR and appointed a standard drafting team (SDT) to make Canadian-specific revisions to TPL-007-2.

Reliability Standard TPL-007-3 adds a Variance for Canadian entities. The Canadian Variance replaces, in its entirety, Requirement R7, Part 7.3 of the continent-wide standard for Canadian entities and adds an alternate methodology for GMD Vulnerability Assessments, as described in Attachment 1-CAN. **None of the continent-wide Requirements have been changed.**

Please provide your responses to the questions listed below along with any detailed comments.

## Questions

1. The SDT developed a Canadian Variance to Requirement R7, Part 7.3 to accommodate for required regulatory approvals in different Canadian jurisdictions. For example, Canadian entities may be required to obtain a regulatory approval for investments associated with Corrective Action Plans (CAPs). Such approval may limit the scope or modify the timeline of a CAP. Do you agree that the proposed Variance to Part 7.3 allows for the necessary flexibility to take into account the required regulatory approvals within your jurisdiction? If you do not agree, or if you agree but have comments or suggestions for the Variance, provide your recommendation, explanation, and proposed modification.

Yes

No

Comments:

2. Do you agree that the language in the introduction section of Attachment 1-CAN adequately describes the Canadian Variance? If you do not agree, or if you agree but have comments or suggestions, provide your recommendation, explanation, and proposed modification.

Yes

No

Comments:

3. The SDT developed the Attachment 1-CAN, as an alternative to Attachment 1, for defining a 1-in-100 year GMD planning event to be used in the benchmark and supplemental GMD Vulnerability Assessment(s)*.* The proposed alternative approach in Attachment 1-CAN for the GMD planning event is to be based on Canadian-specific data and statistical analyses. Do you agree that the proposed approach to define a 1-in-100 year GMD event is sufficiently clear and flexible for Canadian entities while achieving an equivalent level of reliability of TPL-007-2? If you do not agree, or if you agree but have comments or suggestions for defining a GMD event, provide your recommendation, explanation, and proposed modification.

Yes

No

Comments:

4. The SDT proposed that the calculation of the geoelectric fields, which is based on geomagnetic field variations and earth transfer function, must be based on technically justified information. Technically justified information includes technical documents produced by governmental entities, technical papers published in peer-reviewed journals, or data sets gathered using sound scientific principles. Do you agree that technical documents, as defined in Attachment 1-CAN, are credible sources of technically justified information? If you do not agree, or if you agree but have comments or suggestions for defining what constitute a technically justified information, provide your recommendation, explanation, and proposed modification.

Yes

No

Comments:

5. If you have any additional comments regarding the completeness, the adequacy, and the accuracy of the proposed modifications for the SDT to consider, provide them here.

Comments: