

## Web Meeting Agenda Project 2013-03 (Geomagnetic Disturbance) Standard Drafting Team

August 30, 2013 | 9:00 a.m. - 10:00 a.m. EDT

Dial-in: 866.740.1260 | Access Code: 6251541 | Security Code: 0102  
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### Administrative

1. **NERC Antitrust Compliance Guidelines and Public Announcement\***
2. **Participant Conduct Policy\***
3. **Email List Policy\***
4. **Review Meeting Agenda and Objectives**

### Agenda Items

1. **Final Review of EOP-010-1\***
2. **Final Review of Response to Comments**
3. **Review Comment Form and Questions for Second Posting**
4. **Final Review of Technical Briefing Sheets**
  - a. BA Applicability
  - b. 200 kV Threshold
  - c. GOP Applicability
5. **Future Dates**
  - a. Industry Webinar Thursday, September 5, 2013 | 1:00 p.m. - 2:30 p.m. EDT
    - i. 200 kV Justification
    - ii. Changes made to initial draft
  - b. Industry Webinar Thursday, October 3, 2013 | 3:00 p.m. - 4:30 p.m. EDT
  - c. Drafting Team Meeting, NERC HQ Atlanta | October 23-24, 2013

\*Background materials included.

# Antitrust Compliance Guidelines

## I. General

It is NERC's policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct that violates, or that might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition.

It is the responsibility of every NERC participant and employee who may in any way affect NERC's compliance with the antitrust laws to carry out this commitment.

Antitrust laws are complex and subject to court interpretation that can vary over time and from one court to another. The purpose of these guidelines is to alert NERC participants and employees to potential antitrust problems and to set forth policies to be followed with respect to activities that may involve antitrust considerations. In some instances, the NERC policy contained in these guidelines is stricter than the applicable antitrust laws. Any NERC participant or employee who is uncertain about the legal ramifications of a particular course of conduct or who has doubts or concerns about whether NERC's antitrust compliance policy is implicated in any situation should consult NERC's General Counsel immediately.

## II. Prohibited Activities

Participants in NERC activities (including those of its committees and subgroups) should refrain from the following when acting in their capacity as participants in NERC activities (e.g., at NERC meetings, conference calls and in informal discussions):

- Discussions involving pricing information, especially margin (profit) and internal cost information and participants' expectations as to their future prices or internal costs.
- Discussions of a participant's marketing strategies.
- Discussions regarding how customers and geographical areas are to be divided among competitors.
- Discussions concerning the exclusion of competitors from markets.
- Discussions concerning boycotting or group refusals to deal with competitors, vendors or suppliers.

- Any other matters that do not clearly fall within these guidelines should be reviewed with NERC's General Counsel before being discussed.

### **III. Activities That Are Permitted**

From time to time decisions or actions of NERC (including those of its committees and subgroups) may have a negative impact on particular entities and thus in that sense adversely impact competition. Decisions and actions by NERC (including its committees and subgroups) should only be undertaken for the purpose of promoting and maintaining the reliability and adequacy of the bulk power system. If you do not have a legitimate purpose consistent with this objective for discussing a matter, please refrain from discussing the matter during NERC meetings and in other NERC-related communications.

You should also ensure that NERC procedures, including those set forth in NERC's Certificate of Incorporation, Bylaws, and Rules of Procedure are followed in conducting NERC business.

In addition, all discussions in NERC meetings and other NERC-related communications should be within the scope of the mandate for or assignment to the particular NERC committee or subgroup, as well as within the scope of the published agenda for the meeting.

No decisions should be made nor any actions taken in NERC activities for the purpose of giving an industry participant or group of participants a competitive advantage over other participants. In particular, decisions with respect to setting, revising, or assessing compliance with NERC reliability standards should not be influenced by anti-competitive motivations.

Subject to the foregoing restrictions, participants in NERC activities may discuss:

- Reliability matters relating to the bulk power system, including operation and planning matters such as establishing or revising reliability standards, special operating procedures, operating transfer capabilities, and plans for new facilities.
- Matters relating to the impact of reliability standards for the bulk power system on electricity markets, and the impact of electricity market operations on the reliability of the bulk power system.
- Proposed filings or other communications with state or federal regulatory authorities or other governmental entities.

Matters relating to the internal governance, management and operation of NERC, such as nominations for vacant committee positions, budgeting and assessments, and employment matters; and procedural matters such as planning and scheduling meetings.

## Public Announcements

REMINDER FOR USE AT BEGINNING OF MEETINGS AND CONFERENCE CALLS THAT HAVE BEEN PUBLICLY NOTICED AND ARE OPEN TO THE PUBLIC

**Conference call version:**

Participants are reminded that this conference call is public. The access number was posted on the NERC website and widely distributed. Speakers on the call should keep in mind that the listening audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.

**Face-to-face meeting version:**

Participants are reminded that this meeting is public. Notice of the meeting was posted on the NERC website and widely distributed. Participants should keep in mind that the audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.

**For face-to-face meeting, with dial-in capability:**

Participants are reminded that this meeting is public. Notice of the meeting was posted on the NERC website and widely distributed. The notice included the number for dial-in participation. Participants should keep in mind that the audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.

# Standards Development Process

## Participant Conduct Policy

### I. General

To ensure that the standards development process is conducted in a responsible, timely and efficient manner, it is essential to maintain a professional and constructive work environment for all participants. Participants include, but are not limited to, members of the standard drafting team and observers.

Consistent with the NERC Rules of Procedure and the NERC Standard Processes Manual, participation in NERC's Reliability Standards development balloting and approval processes is open to all entities materially affected by NERC's Reliability Standards. In order to ensure the standards development process remains open and to facilitate the development of reliability standards in a timely manner, NERC has adopted the following Participant Conduct Policy for all participants in the standards development process.

### II. Participant Conduct Policy

All participants in the standards development process must conduct themselves in a professional manner at all times. This policy includes in-person conduct and any communication, electronic or otherwise, made as a participant in the standards development process. Examples of unprofessional conduct include, but are not limited to, verbal altercations, use of abusive language, personal attacks or derogatory statements made against or directed at another participant, and frequent or patterned interruptions that disrupt the efficient conduct of a meeting or teleconference.

### III. Reasonable Restrictions in Participation

If a participant does not comply with the Participant Conduct Policy, certain reasonable restrictions on participation in the standards development process may be imposed as described below.

If a NERC Standards Developer determines, by his or her own observation or by complaint of another participant, that a participant's behavior is disruptive to the orderly conduct of a meeting in progress, the NERC Standards Developer may remove the participant from a meeting. Removal by the NERC Standards Developer is limited solely to the meeting in progress and does not extend to any future meeting. Before a participant may be asked to leave the meeting, the NERC Standards Developer must first remind the participant of the obligation to conduct himself or herself in a professional manner and provide an opportunity for the participant to comply. If a participant is requested to leave a meeting by a NERC Standards Developer, the participant must cooperate fully with the request.

Similarly, if a NERC Standards Developer determines, by his or her own observation or by complaint of another participant, that a participant's behavior is disruptive to the orderly conduct of a

teleconference in progress, the NERC Standards Developer may request the participant to leave the teleconference. Removal by the NERC Standards Developer is limited solely to the teleconference in progress and does not extend to any future teleconference. Before a participant may be asked to leave the teleconference, the NERC Standards Developer must first remind the participant of the obligation to conduct himself or herself in a professional manner and provide an opportunity for the participant to comply. If a participant is requested to leave a teleconference by a NERC Standards Developer, the participant must cooperate fully with the request. Alternatively, the NERC Standards Developer may choose to terminate the teleconference.

At any time, the NERC Director of Standards, or a designee, may impose a restriction on a participant from one or more future meetings or teleconferences, a restriction on the use of any NERC-administered list server or other communication list, or such other restriction as may be reasonably necessary to maintain the orderly conduct of the standards development process. Restrictions imposed by the Director of Standards, or a designee, must be approved by the NERC General Counsel, or a designee, prior to implementation to ensure that the restriction is not unreasonable. Once approved, the restriction is binding on the participant. A restricted participant may request removal of the restriction by submitting a request in writing to the Director of Standards. The restriction will be removed at the reasonable discretion of the Director of Standards or a designee.

Any participant who has concerns about NERC's Participant Conduct Policy may contact NERC's General Counsel.

## NERC Email List Policy

NERC provides email lists, or “listservs,” to NERC committees, groups, and teams to facilitate sharing information about NERC activities; including balloting, committee, working group, and drafting team work, with interested parties. All emails sent to NERC listserv addresses must be limited to topics that are directly relevant to the listserv group’s assigned scope of work. NERC reserves the right to apply administrative restrictions to any listserv or its participants, without advance notice, to ensure that the resource is used in accordance with this and other NERC policies.

Prohibited activities include using NERC-provided listservs for any price-fixing, division of markets, and/or other anti-competitive behavior.<sup>1</sup> Recipients and participants on NERC listservs may not utilize NERC listservs for their own private purposes. This may include announcements of a personal nature, sharing of files or attachments not directly relevant to the listserv group’s scope of responsibilities, and/or communication of personal views or opinions, unless those views are provided to advance the work of the listserv’s group. Use of NERC’s listservs is further subject to NERC’s Participant Conduct Policy for the Standards Development Process.

- *Updated April 2013*

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<sup>1</sup> Please see NERC’s Antitrust Compliance Guidelines for more information about prohibited antitrust and anti-competitive behavior or practices. This policy is available at <http://www.nerc.com/commondocs.php?cd=2>

## Standard Development Timeline

*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

### Development Steps Completed

#### Description of Current Draft

This draft is the first posting of the proposed standard and is being done in conjunction with the posting of the SAR for this project.

Anticipated Actions	Anticipated Date
<del>3045</del> -day Formal Comment Period <u>with Initial Ballot</u>	June 2013
45-day Formal Comment Period with <del>Parallel Initial</del> Ballot	<del>August</del> <u>September</u> 2013
<del>Successive Ballot (if needed)</del>	<del>September</del> 2013
<del>Recirculation</del> <u>Final</u> ballot	<del>November</del> <u>October</u> 2013
BOT adoption	November 2013



## Effective Dates

The first day of the first calendar quarter that is six months beyond the date that this standard is approved by applicable regulatory authorities. In those jurisdictions where regulatory approval is not required, the standard shall become effective on the first day of the first calendar quarter that is six months beyond the date this standard is approved by the NERC Board of Trustees, or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities.

## Version History

Version	Date	Action	Change Tracking
1	TBD	Project 2013-03	N/A

## Definitions of Terms Used in Standard

*This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.*

None

## A. Introduction

1. **Title: Geomagnetic Disturbance Operations**
2. **Number:** EOP-010-1
3. **Purpose:** To mitigate the effects of geomagnetic disturbance (GMD) events by implementing Operating Plans, Processes, and Procedures.
4. **Applicability:**
  - 4.1. **Functional Entities:**
    - 4.1.1 Reliability Coordinator
    - ~~4.1.2 Balancing Authority with a Balancing Authority Area that includes any transformer with high side terminal voltage greater than 200 kV~~
    - 4.1.34.1.2 Transmission Operator with a Transmission Operator Area that includes any a power transformer with a high side high sidewye-grounded winding with terminal voltage greater than 200 kV
5. **Background:**

Geomagnetic disturbance (GMD) events have the potential to negatively adversely impact the reliable operation of interconnected transmission systems. During a GMD event, geomagnetically-induced currents (GIC) may cause transformer hot-spot heating or damage, loss of Reactive Power sources, increased Reactive Power demand, and protection system Misoperation, the combination of which ~~can lead to~~may result in voltage collapse and blackout.

## B. Requirements and Measures

- R1.** Each Reliability Coordinator shall develop, maintain, and implement a GMD Operating Plan ~~to that~~ that coordinates GMD Operating Procedures within its Reliability Coordinator Area. At a minimum, the GMD Operating Plan shall include: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning, Operations Planning, Real-time Operations]*
- 1.1 A description of activities designed to mitigate the effects of GMD events on the reliable operation of the interconnected transmission system within the Reliability Coordinator Area.
  - 1.2 A process for the Reliability Coordinator to ~~determine review that~~ the GMD Operating Procedures of ~~all~~ Transmission Operators ~~and Balancing Authorities~~ in the

An operating plan is implemented by carrying out its stated actions.

Coordination should ensure that operating procedures are not in conflict with one another.

An operating plan is maintained when it is kept relevant by taking into consideration system configuration, conditions, or operating experience, as needed to accomplish its purpose.

Reliability Coordinator Area ~~are~~  
~~coordinated and compatible.~~

**M1.** Each Reliability Coordinator shall have a GMD Operating Plan meeting all the provisions of Requirement R1, evidence such as a review or revision history to indicate that the GMD Operating Plan has been maintained, and evidence to show that the plan was implemented such as dated operator logs. ~~correspondence with Transmission Operators and Balancing Authorities.~~

~~**R2.** Each Reliability Coordinator shall review its GMD Operating Plan at least once every 36 calendar months from the last effective date. [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning, Operations Planning]~~

~~**M2.** Each Reliability Coordinator shall have evidence that it has reviewed its GMD Operating Plan within the timeframe of Requirement R2 such as a dated review signature sheet or revision history.~~

**R2.** Each Reliability Coordinator shall disseminate forecasted and current space weather information as specified in the Reliability Coordinator's GMD Operating Plan. [Violation Risk Factor: Medium] [Time Horizon: Real-Time Operations] (IRO-005-3.1a Requirement R3 must remain effective until EOP-010-1 becomes effective.)

Space weather forecast information can be used for situational awareness and safe posturing of the system. Current space weather information can be used for monitoring ~~storm~~ progress of a GMD event.

The Reliability Coordinator is responsible for disseminating space weather information to ensure consistency and coordination in the Reliability Coordinator Area.

**M2.** Each Reliability Coordinator shall have evidence such as dated operator logs, voice recordings, or transcripts to indicate that forecasted and current space weather information was disseminated as stated.

**R3.** Each Transmission Operator ~~and Balancing Authority~~ shall develop, maintain, and implement an Operating Procedures or Operating Process to mitigate the effects of GMD events on the reliable operation of its respective system. At a minimum, the Operating Procedures or Operating Process shall include: [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning, Operations Planning, Real-Time Operations]

An Operating Procedure or Operating Process is implemented by carrying out its stated actions.

An Operating Procedure or Operating Process is maintained when it is kept relevant by taking into consideration system configuration, conditions, or operating experience, as needed to accomplish its purpose.

- 3.1. ~~The Steps or tasks to receive for the acquisition and dissemination of space weather information to its System Operators.~~
- 3.2. ~~The steps or tasks to be employed by System Operator actions to be initiated based on predetermined conditions, that are coordinated with its Reliability Coordinator's GMD Operating Plan to mitigate the effects on the system from GMD events.~~
- 3.3. The ~~predetermined trigger~~ conditions for ~~initiating and terminating steps or tasks in~~ the Operating Procedure or Operating Process.

**M3.** Each Transmission Operator ~~and Balancing Authority~~ shall have GMD Operating Procedures meeting all the provisions of Requirement R3.

~~**R4.** Each Transmission Operator and Balancing Authority shall review its GMD Operating Procedures at least once every 36 calendar months from the last effective date. [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning, Operations Planning]~~

~~**M4.** Each Transmission Operator and Balancing Authority shall have evidence that it has reviewed its GMD Operating Procedures within the timeframe of Requirement R4 such as a dated review signature sheet or revision history.~~

~~**R5.** Each Transmission Operator and Balancing Authority shall have a copy of its GMD Operating Procedures in its primary control room and any applicable backup control rooms so that it is available to its operating personnel prior to its implementation date. [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning, Operations Planning]~~

~~**M5.** Each Transmission Operator and Balancing Authority shall have hard copies or electronic copies of its GMD Operating Procedure available for inspection as stated.~~

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

#### 1.2. Evidence Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since

the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Reliability Coordinator, ~~and~~ Transmission Operator ~~and Balancing Authority~~ shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

The responsible entities shall retain documentation as evidence for 3 years.

If a responsible entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

### **1.3. Compliance Monitoring and Assessment Processes:**

Compliance Audits

Self-Certifications

Spot Checking

Compliance Violation Investigations

Self-Reporting

Complaints Text

### **1.4. Additional Compliance Information**

None

**Table of Compliance Elements**

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Long-term Planning, Operations Planning, <u>Real-time Operations</u>	Medium	The Reliability Coordinator failed to maintain a GMD Operating Plan	N/A	The Reliability Coordinator's GMD Operating Plan failed to include one of the elements listed in Requirement R1, parts 1.1 or 1.2.	The Reliability Coordinator did not have a GMD Operating Plan OR The Reliability Coordinator failed to implement a GMD Operating Plan within its Reliability Coordinator Area
<del>R2</del>	<del>Long-term Planning, Operations Planning</del>	<del>Medium</del>	<del>The Reliability Coordinator reviewed its GMD Operating Plan more than 36 months, but less than 39 months, since the effective date.</del>	<del>The Reliability Coordinator reviewed its GMD Operating Plan more than 39 months, but less than 42 months, since the effective date.</del>	<del>The Reliability Coordinator reviewed its GMD Operating Plan more than 42 months since the effective date.</del>	<del>The Reliability Coordinator did not review its GMD Operating Plan</del>
<u>R2</u>	<u>Real-time Operations</u>	<u>Medium</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>The Reliability Coordinator failed to disseminate forecasted and current space weather information as specified in the</u>

						<u>Reliability Coordinator's GMD Operating Plan.</u>
R3	Long-term Planning, Operations Planning, <u>Real-time Operations</u>	Medium	The <del>responsible entity</del> <u>Transmission Operator</u> failed to maintain <u>a GMD Operating Procedures or Operating Process</u>	The <del>responsible entity</del> <u>Transmission Operator's</u> GMD Operating Procedures <u>or Operating Process</u> failed to include one element in Requirement R3, parts 3.1 through 3.3.	The <del>responsible entity</del> <u>Transmission Operator's</u> GMD Operating Procedures <u>or Operating Process</u> failed to include two or more elements in Requirement R3, parts 3.1 through 3.3.	The <del>responsible entity</del> <u>Transmission Operator</u> did not have <u>a GMD Operating Procedure or Operating Process</u>  OR The responsible entity failed to implement its GMD Operating Procedures <u>or Operating Process</u> .
R4	Long-term Planning, Operations Planning	Medium	The <del>responsible entity</del> reviewed its <del>GMD Operating Procedures</del> and submitted them for approval more than 36 months, but less than 39 months, since the last effective date.	The <del>responsible entity</del> reviewed its <del>GMD Operating Procedures</del> and submitted them for approval more than 39 months, but less than 42 months, since the last effective date.	The <del>responsible entity</del> reviewed its <del>GMD Operating Procedures</del> and submitted them for approval more than 42 months since the last effective date.	The <del>responsible entity</del> did not review its <del>GMD Operating Procedures</del> and submit them for approval.
R5	Long-term Planning, Operations Planning	Medium	N/A	N/A	N/A	The <del>responsible entity</del> did not have copies of its <del>GMD Operating Procedures</del> in its primary control room

						and all backup control rooms if applicable.
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**D. Regional Variances**

None.

**E. Interpretations**

None.

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## Standard Development Timeline

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*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

### Development Steps Completed

#### Description of Current Draft

This draft is the first posting of the proposed standard and is being done in conjunction with the posting of the SAR for this project.

Anticipated Actions	Anticipated Date
45-day Formal Comment Period with Initial Ballot	June 2013
45-day Formal Comment Period with Ballot	September 2013
Final ballot	October 2013
BOT adoption	November 2013

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  - 4.1. **Functional Entities:**
    - 4.1.1 Reliability Coordinator
    - 4.1.2 Transmission Operator with a Transmission Operator Area that includes a power transformer with a high side wye-grounded winding with terminal voltage greater than 200 kV
5. **Background:**

Geomagnetic disturbance (GMD) events have the potential to adversely impact the reliable operation of interconnected transmission systems. During a GMD event, geomagnetically-induced currents (GIC) may cause transformer hot-spot heating or damage, loss of Reactive Power sources, increased Reactive Power demand, and protection system Misoperation, the combination of which may result in voltage collapse and blackout.

## B. Requirements and Measures

- R1. Each Reliability Coordinator shall develop, maintain, and implement a GMD Operating Plan that coordinates GMD Operating Procedures within its Reliability Coordinator Area. At a minimum, the GMD Operating Plan shall include: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning, Operations Planning, Real-time Operations]*
  - 1.1 A description of activities designed to mitigate the effects of GMD events on the reliable operation of the interconnected transmission system within the Reliability Coordinator Area.
  - 1.2 A process for the Reliability Coordinator to review the GMD Operating Procedures of Transmission Operators in the Reliability Coordinator Area.
- M1. Each Reliability Coordinator shall have a GMD Operating Plan meeting all the provisions of Requirement R1, evidence such as a review or revision history to

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indicate that the GMD Operating Plan has been maintained, and evidence to show that the plan was implemented such as dated operator logs.

- R2.** Each Reliability Coordinator shall disseminate forecasted and current space weather information as specified in the Reliability Coordinator's GMD Operating Plan. *[Violation Risk Factor: Medium] [Time Horizon: Real-Time Operations]* (IRO-005-3.1a Requirement R3 must remain effective until EOP-010-1 becomes effective.)

Space weather forecast information can be used for situational awareness and safe posturing of the system. Current space weather information can be used for monitoring progress of a GMD event.

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An Operating Procedure or Operating Process is implemented by carrying out its stated actions.

An Operating Procedure or Operating Process is maintained when it is kept relevant by taking into consideration system configuration, conditions, or operating experience, as needed to accomplish its purpose.

- 3.1.** Steps or tasks to receive space weather information.
- 3.2.** System Operator actions to be initiated based on predetermined conditions.
- 3.3** The conditions for terminating the Operating Procedure or Operating Process.

- M3.** Each Transmission Operator shall have GMD Operating Procedures meeting all the provisions of Requirement R3.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

## **1.2. Evidence Retention**

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Reliability Coordinator and Transmission Operator shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

The responsible entities shall retain documentation as evidence for 3 years.

If a responsible entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

## **1.3. Compliance Monitoring and Assessment Processes:**

Compliance Audits

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Complaints Text

## **1.4. Additional Compliance Information**

None

**Table of Compliance Elements**

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
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R2	Real-time Operations	Medium	N/A	N/A	N/A	The Reliability Coordinator failed to disseminate forecasted and current space weather information as specified in the Reliability Coordinator's GMD Operating Plan.
R3	Long-term Planning, Operations Planning, Real-time	Medium	The Transmission Operator failed to maintain a GMD Operating Procedure or Operating Process	The Transmission Operator's GMD Operating Procedures or Operating Process failed to include one	The Transmission Operator's GMD Operating Procedures or Operating Process failed to include two or	The Transmission Operator did not have a GMD Operating Procedure or Operating Process

	Operations			element in Requirement R3, parts 3.1 through 3.3.	more elements in Requirement R3, parts 3.1 through 3.3.	OR The responsible entity failed to implement its GMD Operating Procedures or Operating Process.
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**D. Regional Variances**

None.

**E. Interpretations**

None.

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