Order No. 779 Citation	Directive/Guidance	Resolution in EOP-010-1
P 36	The Commission directs NERC to submit, within six months of the effective date of this Final Rule, one or more Reliability Standards requiring owners and operators of the Bulk-Power System to develop and implement operational procedures to mitigate the effects of GMDs consistent with the reliable operation of the Bulk-Power System.	Requirement R1 requires Reliability Coordinators to develop, maintain, and implement a GMD Operating Plan that coordinates GMD Operating Procedures or Operating Processes within its Reliability Coordinator Area. Requirement R3 requires Transmission Operators to develop, maintain, and implement a GMD Operating Procedure or Operating Process to mitigate the effects of GMD events on the reliable operation of its respective system.
		Analysis of the applicable functional entities is provided in a white paper posted on the project page. (http://www.nerc.com/pa/Stand/Pages/Project-2013-03-Geomagnetic-Disturbance-Mitigation.aspx)
P 38	The Commission is not directing NERC to develop Reliability Standards that include specific operational procedures. Instead, as proposed in the NOPR, the Reliability Standards should include a mechanism that requires responsible entities to develop and implement operational procedures because owners and operators of the Bulk-Power System are most familiar with their own equipment and system configurations. In addition, we do not expect that owners and operators of the Bulk-Power System will necessarily	EOP-010-1 is not prescriptive and allows entities to tailor their Operational Procedures or Operating Processes based on the responsible entity's assessment of entity-specific factors, such as geography, geology, and system topology.
	develop and implement the same operational procedures. Instead, the Reliability Standards, rather than include "one-size-fits-all" Requirements, should allow responsible entities to tailor their operational procedures based on the responsible entity's assessment of entity-specific factors, such as geography, geology, and system topology, identified in the Reliability Standards. In addition, as we stated in the NOPR, the coordination of operational procedures across regions is an important issue that should be considered in the NERC standards development process. ⁶⁸ The coordination	Requirement R1 addresses coordination and requires Reliability Coordinators to develop, maintain and implement a GMD Operating Plan that coordinates GMD Operating Procedures or Operating Processes within its Reliability Coordinator Area. The coordination of Operating Procedures and

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Citation		
	of operational procedures across regions and data sharing might be overseen	Operating Processes across regions is addressed
	by planning coordinators or another functional entity with a wide-area	through existing Reliability Standards.
	perspective. ⁶⁹ The NERC standards development process, as stated in the	
	NOPR, should also consider operational procedures for restoring GMD-	EOP-005 (System Restoration from Blackstart
	impacted portions of the Bulk-Power System that take into account the	Resources) and EOP-006 (System Restoration
	potential for damaged equipment that could be de-rated or out-of-service for	Coordination) address Bulk-Power System
	an extended period of time.	restoration following a Disturbance. These plans
		are expected to be effective for restoration
		following any unplanned event. A duplicative
		requirement was not included in EOP-010-1.