Unofficial Comment Form

Project 2019-01 Modifications to TPL-007-3

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **TPL-007-4 – Transmission System Planned Performance for Geomagnetic Disturbance Events**. Comments must be submitted by **8 p.m. Eastern, Monday, September 9, 2019.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project2019-01ModificationstoTPL-007-3.aspx). If you have questions, contact Senior Standards Developer, Alison Oswald (via email), or at 404-446-9668.

## Background Information

The first version of the standard, [TPL-007-1](http://www.nerc.com/_layouts/PrintStandard.aspx?standardnumber=TPL-007-1&title=Transmission%20System%20Planned%20Performance%20for%20Geomagnetic%20Disturbance%20Events), requires entities to assess the impact to their systems from a defined event referred to as the “Benchmark GMD Event.” The second version of the standard, TPL-007-2, adds new Requirements R8, R9, and R10 to require responsible entities to assess the potential implications of a “Supplemental GMD Event” on their equipment and systems in accordance with the FERC’s directives in [Order No. 830](http://www.nerc.com/filingsorders/us/FERCOrdersRules/E-4.pdf). The third version of the standard, TPL-007-3, adds a Canadian variance for Canadian Registered Entities 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. No continent-wide requirements were changed between the second and the third versions of the standard. This project will address the directives issued by FERC in [Order No. 851](https://www.nerc.com/FilingsOrders/us/FERCOrdersRules/E-3_Order%20No%20851.pdf) to modify Reliability Standard TPL-007-3. FERC directed NERC to submit modifications to: (1) require the development and implementation of corrective action plans to mitigate assessed supplemental GMD event vulnerabilities (P 29); and (2) to replace the corrective action plan time-extension provision in TPL-007-3 Requirement R7.4 with a process through which extensions of time are considered on a case-by-case basis (P 54).

## Questions

1. The SDT approach was to modify Requirement R7.4 to meet the directive in Order 851 to require prior approval of extension requests for completing corrective action plan tasks. Do you agree that R7 meets the directive? If you disagree please explain and provide alternative language and rationale for how it meets the directive of the order.

[ ]  Yes

[ ]  No

Comments:

1. The SDT approach was to add Requirement R11 to meet the directive in Order No. 851 to “require corrective action plans for assessed supplemental GMD event vulnerabilities.” R7 and R11 are the same language applied to the benchmark and supplemental events respectively. Do you agree that R11 meets the directive? If you disagree please explain and provide alternative language and rationale for how it meets the directive of the order.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that the Canadian variance is written in a way that accommodates the regulatory processes in Canada? If you disagree please explain and provide alternative language and rationale for how it meets the directive of the order while accommodating Canadian regulatory processes.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree that the standard language changes in Requirement R7, R8, and R11 proposed by the SDT adequately address the directives in FERC Order No. 851? If you disagree please explain and provide alternative language and rationale for how it meets the directive of the order.

[ ]  Yes

[ ]  No

Comments:

1. Do you have any comments on the modified VRF/VSL for Requirements R7, R8, and R11?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the proposed Implementation Plan? If you think an alternate, shorter or longer implementation time period is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

[ ]  Yes

[ ]  No

Comments:

1. The SDT proposes that the modifications in TPL-007-4 meet the FERC directives in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

[ ]  Yes

[ ]  No

Comments:

1. Provide any additional comments for the standard drafting team to consider, if desired.

Comments: