

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

North American Electric Reliability Corporation))	Docket Nos. RM18-8-000 RD20-3-000
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**INFORMATIONAL FILING OF
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
REGARDING TPL-007-4 CORRECTIVE ACTION PLAN EXTENSION REQUESTS**

Pursuant to paragraph 30 of Order No. 851¹ issued by the Federal Energy Regulatory Commission (“FERC” or the “Commission”), the North American Electric Reliability Corporation (“NERC”) hereby submits this informational filing in response to a directive to prepare and submit a report addressing Corrective Action Plan (“CAP”)² time extension requests under TPL-007-4.³ The Commission directed NERC to submit the report by January 1, 2025.⁴ As of the date of this filing, the ERO Enterprise has received no CAP time extension requests under Reliability Standard TPL-007-4 – Transmission System Planned Performance for Geomagnetic Disturbance Events.

I. Background

Reliability Standard TPL-007-4 requires owners and operators of the Bulk Power System (“BPS”) to conduct initial and on-going vulnerability assessments of the potential impact of defined geomagnetic disturbance (“GMD”) events on BPS equipment and the BPS as a whole. If

¹ *Geomagnetic Disturbance Reliability Standard*, Order No. 851, 165 FERC ¶ 61,124 P 30 (2018) [hereinafter Order No. 851].

² Unless otherwise indicated, all capitalized terms used in this petition shall have the meaning set forth in the Glossary of Terms used in NERC Reliability Standards (“NERC Glossary”), https://www.nerc.com/pa/Stand/Glossary%20of%20Terms/Glossary_of_Terms.pdf.

³ Order No. 851, *supra*. While the original directive addressed requirements in TPL-007-2, the implementation plan for Reliability Standard TPL-007-4 carries forward the existing phased-in compliance schedule established by the TPL-007-2 implementation plan.

⁴ *Id.* January 1, 2025 is 12 months from the date on which applicable entities must comply with the last requirement of Reliability Standard TPL-007-4.

entities identify system performance issues through their assessments, they must take action to mitigate these issues through a CAP.

While Reliability Standard TPL-007-4 is currently enforceable in the United States, the directive to submit a report on CAP time extension requests originated in the FERC order approving Reliability Standard TPL-007-2. In Order No. 851, the Commission approved Reliability Standard TPL-007-2 and directed NERC to develop and submit two sets of modifications to the standard relating to requirements for CAPs.⁵ In addition, the Commission directed NERC “to prepare and submit a report addressing how often and why applicable entities are exceeding [CAP] deadlines as well as the disposition of time extension requests. The report is due within 12 months from the date on which applicable entities must comply with the last requirement of Reliability Standard TPL-007-2.”⁶

Subsequently, on February 21, 2019, NERC provided an informational notice to the Commission regarding Reliability Standard TPL-007-3, which added a regional Variance option for Canadian jurisdictions.⁷ All phased-in compliance dates for U.S.-based entities were carried forward unchanged from the Commission-approved TPL-007- 2 implementation plan.

To address the Commission’s directive regarding standards modifications in Order No. 851, NERC developed Reliability Standard TPL-007-4, which the Commission approved on March 19, 2020.⁸ The TPL-007-4 implementation plan integrated the new and revised CAP requirements in Reliability Standard TPL-007-4 with the existing phased-in compliance date timeframe under the TPL-007-3 implementation plan.

⁵ *Id.* at PP 29 and 39.

⁶ *Id.* at P 30.

⁷ Informational Filing regarding Reliability Standard TPL-007-3, Docket No. RM18-8-000 (Feb. 21, 2019).

⁸ *N. Am. Elec. Reliability Corp.*, Letter Order, Docket No. RD20-3-000 (Mar. 19, 2020).

As the implementation plan for TPL-007-4 carried forward the phased-in compliance dates from previous versions, the last requirements became effective on January 1, 2024 for United States entities. Accordingly, the report directed by the Commission in Order No. 851 is due by January 1, 2025.

II. Notices and Communications

Notices and communications with respect to this filing may be addressed to the following:

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III. Information on Time Extension Requests

Under Requirement R7 and Requirement R11 of TPL-007-4, each responsible entity must develop a CAP if the benchmark GMD Vulnerability Assessment⁹ or supplemental GMD Vulnerability Assessment¹⁰ indicate their System does not meet the performance requirements for the steady state planning benchmark or supplemental GMD event. The requirement parts within Requirement R7 and Requirement R11 further detail what a responsible entity must include in the CAP. Additionally, Part 7.4 and Part 11.4 require the responsible entity to submit the CAP to a

⁹ This assessment is conducted pursuant to TPL-007-4, Requirement R4.

¹⁰ This assessment is conducted pursuant to TPL-007-4, Requirement R8.

Compliance Enforcement Authority¹¹ with a request for extension of time if the responsible entity is unable to implement the CAP within the timetable provided in Part 7.3 or Part 11.3, respectively.

While proposed TPL-007-4 properly focuses on the responsibilities of applicable entities, the ERO Enterprise recognized the Commission's expectation in Order No. 851 that the process for considering such extensions "will be timely and efficient such that applicable entities will receive prompt responses" after submitting their requests.¹² To that end, the ERO Enterprise developed its TPL-007-4 CAP Extension Request Review Process, which is posted as part of its annual Periodic Data Submittal Schedule.¹³

The ERO Enterprise reports that it has received no CAP time extension requests as of the date of this filing. NERC requests the Commission consider this informational filing as satisfying the directive in Order No. 851 to submit a report on CAP time extension requests.

IV. Conclusion

NERC requests that the Commission accept this informational filing in satisfaction of the Order No. 851 directive to submit a report on CAP time extension requests.

Respectfully submitted,

¹¹ According to TPL-007-4, "Compliance Enforcement Authority" means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

¹² Order No. 851, *supra*, at P 55.

¹³ The 2025 ERO Enterprise Periodic Data Submittals Schedule includes the TPL-007-4 CAP Extension Request Review Process as Appendix C. The 2025 ERO Enterprise Periodic Data Submittals Schedule is available at <https://www.nerc.com/pa/comp/CAOneStopShop/2025%20ERO%20Enterprise%20Periodic%20Data%20Submittal%20Schedule.pdf>.

/s/ Marisa Hecht

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December 6, 2024

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this submittal upon all parties listed on the official service lists compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 6th day of December 2024.

/s/ Marisa Hecht

Marisa Hecht
*Counsel for the North American Electric Reliability
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