Unofficial Comment Form

Project 2013-03 Geomagnetic Disturbance Mitigation

**DO NOT** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on proposed **TPL-007-2 − Transmission System Planned Performance for Geomagnetic Disturbance Events**. The electronic comment form must be completed by **8:00 p.m. Eastern, Friday, August 11, 2017**.

Documents and information about this project are available on the [project page](http://www.nerc.com/pa/Stand/Pages/Project-2013-03-Geomagnetic-Disturbance-Mitigation.aspx). If you have any questions, contact Standards Developer, Mark Olson (via email), or at (404) 446-9760.

## Background Information

On September 22, 2016, the Federal Energy Regulatory Commission (FERC) issued Order No. 830 approving Reliability Standard TPL-007-1 − Transmission System Planned Performance for Geomagnetic Disturbance Events. In the order, FERC directed NERC to develop certain modifications to the Standard, including:

* Modify the benchmark geomagnetic disturbance (GMD) event definition used for GMD Vulnerability Assessments;
* Make related modifications to requirements pertaining to transformer thermal impact assessments;
* Require collection of GMD-related data; and
* Require deadlines for Corrective Action Plans (CAPs) and GMD mitigating actions.

FERC established a deadline of 18 months from the effective date of Order No. 830 for completing the revisions, which is May 2018.

The standard drafting team (SDT) has developed proposed TPL-007-2 to address the above directives.

## Questions

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

1. The SDT developed proposed Requirements R8 – R10 and the supplemental GMD event to address FERC concerns with the benchmark GMD event used in GMD Vulnerability Assessments. (Order No. 830 P.44, P.47-49, P.65). The requirements will obligate responsible entities to perform a supplemental GMD Vulnerability Assessment based on the supplemental GMD event that accounts for potential impacts of localized peak geoelectric fields. Do you agree with the proposed requirements? If you do not agree, or if you agree but have comments or suggestions for the proposed requirements provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

2. The SDT developed the *Supplemental GMD Event Description* white paper to provide technical justification for the supplemental GMD event. The purpose of the supplemental GMD event description is to provide a defined event for assessing system performance for a GMD event which includes a local enhancement of the geomagnetic field. Do you agree with the proposed supplemental GMD event and the description in the white paper? If you do not agree, or if you agree but have comments or suggestions for the supplemental GMD event and the description in the white paper provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

3. The SDT established an 85 A per phase screening criterion for determining which power transformers are required to be assessed for thermal impacts from a supplemental GMD event in Requirement R10. Justification for this threshold is provided in the revised *Screening Criterion for Transformer Thermal Impact Assessment* white paper. Do you agree with the proposed 85 A per phase screening criterion and the technical justification for this criterion that has been added to the white paper? If you do not agree, or if you agree but have comments or suggestions for the screening criterion and revisions to the white paper provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

4. The SDT revised the *Transformer Thermal Impact Assessment* white paper to include the supplemental GMD event. Do you agree with the revisions to the white paper? If you do not agree, or if you agree but have comments or suggestions on the revisions to the white paper provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

5. The SDT developed proposed Requirement R7 to address FERC directives in Order No. 830 for establishing Corrective Action Plan (CAP) deadlines associated with GMD Vulnerability Assessments (P. 101, 102). Do you agree with the proposed requirement? If you do not agree, or if you agree but have comments or suggestions for the proposed requirement provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

6. The SDT developed Requirements R11 and R12 to address FERC directives in Order No. 830 for requiring responsible entities to collect GIC monitoring and magnetometer data (P. 88; P. 90-92). Do you agree with the proposed requirements? If you do not agree, or if you agree but have comments or suggestions for the proposed requirements provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

7. Do you agree with the proposed Implementation Plan for TPL-007-2? If you do not agree, or if you agree but have comments or suggestions for the Implementation Plan provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

8. Do you agree with the Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) for the requirements in proposed TPL-007-2? If you do not agree, or if you agree but have comments or suggestions for the VRFs and VSLs provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

9. The SDT believes proposed TPL-007-2 provide entities with flexibility to meet the reliability objectives in the project Standards Authorization Request (SAR) in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable additional cost effective approaches to meet the reliability objectives, please provide your recommendation and, if appropriate, technical justification.

[ ]  Yes

[ ]  No

Comments:

10. Provide any additional comments for the SDT to consider, if desired.

Comments: