

**From:** [Guy V. Zito](#)  
**To:** [rscmembers](#)  
**Subject:** NERC Formal Comment and Initial Ballot-Project 2019-01 Modifications to TPL-007-3  
**Date:** Thursday, August 29, 2019 1:45:32 PM  
**Importance:** High

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RSC Members,

A 45-day formal comment period for the draft TPL-007-4 – Transmission System Planned Performance for Geomagnetic Disturbance Events is currently open through 8 p.m. Eastern, Monday, September 9, 2019. An initial ballot for the standard, along with non-binding polls for the associated Violation Risk Factors and Violation Severity Levels, will be conducted August 30 - September 9, 2019. This project addresses the directives issued by FERC in Order No. 851 to modify Reliability Standard TPL-007-3. FERC directed NERC to submit modifications to:

- require the development and implementation of corrective action plans to mitigate assessed supplemental GMD event vulnerabilities (P 29); and
- to replace the corrective action plan time-extension provision in Requirement R7.4 with a process through which extensions of time are considered on a case-by-case basis (P 54).

A draft ERO process to review extensions of time for CAPs has been posted to accompany the initial posting. The ERO process is provided for information purposes only and is not being balloted. Additionally there is a CMEP Implementation Guidance document which I emailed about earlier today which is not part of the ballot but NPCC will comment on it.

NPCC will be voting **Affirmative** on the draft standard and casting a **positive opinion** on the non-binding poll, as the Regional Entity. Please indicate if you don't intend to support the draft standard and share your concerns either with me or the RSC Members no later than COB September 5, 2019. At this time I am not aware of anyone expressing concern with the standard. Additionally, we have engaged with NPCC's Canadian entities to revise the Variance section of the standard with conforming changes reflective of their regulatory environments.

Let me know if you have any questions.

Thanks,

Guy