

From: [Guy V. Zito](#)
To: [rsballot](#)
Cc: [rsc](#)
Subject: NERC Ballot- Project 2019-01 Modifications to TPL-007-3
Date: Thursday, September 5, 2019 11:22:07 AM
Importance: High

NPCC Members and Entities of the NERC Registered Ballot Body,

A 45-day formal comment period for TPL-007-4 – Transmission System Planned Performance for Geomagnetic Disturbance Events is 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 is available through 8pm - 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: (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 (CAP) 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). The Regional Standard Committee has not reached consensus on a ballot position. Dissenting members expressed concern regarding the NERC process to approve the proposed CAP extension and believe the affected Reliability Coordinator should have this role.

NPCC, as the Regional Entity, believes the proposed revised standard will support reliable operation of the BES and addresses the FERC Directives in Order 830. Regarding the involvement of the RC in the determination of the validity of the CAP extension request; RC involvement in the reliability decision, may and in all likelihood, will be done irrespective of the existence of a standard requirement. **NPCC as the Regional Entity will be voting Affirmative on the revised standard and also will be casting a positive opinion on the non-binding poll.**

If you have any questions please contact me.

Guy V. Zito
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NPCC Asst. Vice President - Standards