Unofficial Comment Form
Project 2018-01 Canadian-specific Revisions to TPL-007-2

Do not use this form for submitting comments. Use the electronic form to submit comments on the proposed TPL-007-3 (Canadian Variance) – Transmission System Planned Performance for Geomagnetic Disturbance Events. The electronic comment form must be completed by 8:00 p.m. Eastern, Thursday, November 15, 2018.

Documents and information about this project are available on the project page. If you have questions, contact Standards Developer, Mat Bunch (via email), or at (404) 446-9785.

Project Purpose
The purpose of this project is to provide Canadian entities the latitude 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. This project also addresses regulatory frameworks specific to Canadian jurisdictions.

Background and Summary
Reliability Standard TPL-007-2 – Transmission System Planned Performance for Geomagnetic Disturbance Events was approved by industry in 2017 and filed with the Federal Energy Regulatory Commission on January 22, 2018 and the Canadian authorities on February 27, 2018. On June 13, 2018, the Standards Committee approved a SAR and appointed a standard drafting team (SDT) to make Canadian-specific revisions to TPL-007-2.

Reliability Standard TPL-007-3 adds a Variance for Canadian entities. The Canadian Variance replaces, in its entirety, Requirement R7, Part 7.3 of the continent-wide standard for Canadian entities and adds an alternate methodology for GMD Vulnerability Assessments, as described in Attachment 1-CAN. None of the continent-wide Requirements have been changed.

Please provide your responses to the questions listed below along with any detailed comments.
Questions

1. The SDT developed a Canadian Variance to Requirement R7, Part 7.3 to accommodate for required regulatory approvals in different Canadian jurisdictions. For example, Canadian entities may be required to obtain a regulatory approval for investments associated with Corrective Action Plans (CAPs). Such approval may limit the scope or modify the timeline of a CAP. Do you agree that the proposed Variance to Part 7.3 allows for the necessary flexibility to take into account the required regulatory approvals within your jurisdiction? If you do not agree, or if you agree but have comments or suggestions for the Variance, provide your recommendation, explanation, and proposed modification.

☐ Yes
☐ No
Comments: The proposed language change provides the flexibility to account for the regulatory approval process in Canada.

2. Do you agree that the language in the introduction section of Attachment 1-CAN adequately describes the Canadian Variance? If you do not agree, or if you agree but have comments or suggestions, provide your recommendation, explanation, and proposed modification.

☐ Yes
☐ No
Comments: The effective geo-electric field depends on the both geomagnetic latitude and earth conductivity. Both of these factors tend to be larger in Canada compared with most with other places subject to NERC standards so the risk of higher GICs in Canada is higher. The introduction adequately describes the balance the Canadian variance will achieve: preserving an equivalent level of reliability (e.g. 1-in-100 year event) while allowing the flexibility to use an approach that can be demonstrated to better match Canadian circumstances.

3. The SDT developed the Attachment 1-CAN, as an alternative to Attachment 1, for defining a 1-in-100 year GMD planning event to be used in the benchmark and supplemental GMD Vulnerability Assessment(s). The proposed alternative approach in Attachment 1-CAN for the GMD planning event is to be based on Canadian-specific data and statistical analyses. Do you agree that the proposed approach to define a 1-in-100 year GMD event is sufficiently clear and flexible for Canadian entities while achieving an equivalent level of reliability of TPL-007-2? If you do not agree, or if you agree but have comments or suggestions for defining a GMD event, provide your recommendation, explanation, and proposed modification.

☐ Yes
☐ No
Comments:
Requiring the methodology and assumptions specified in TPL-007-2 to be used unless the data and sensitivity assessment conditions in the Canadian Variance are both satisfied is sufficiently clear and flexible for Canadian entities while achieving an equivalent level of reliability.

4. The SDT proposed that the calculation of the geoelectric fields, which is based on geomagnetic field variations and earth transfer function, must be based on technically justified information. Technically justified information includes technical documents produced by governmental entities, technical papers published in peer-reviewed journals, or data sets gathered using sound scientific principles. Do you agree that technical documents, as defined in Attachment 1-CAN, are credible sources of technically justified information? If you do not agree, or if you agree but have comments or suggestions for defining what constitute a technically justified information, provide your recommendation, explanation, and proposed modification.

☐ Yes
☐ No
Comments:
The technical documents defined in Attachment 1-CAN are a credible source of technically justified information. Direct measurements (e.g. GIC current, magnetic field) in Canada should be given the highest weighting when assessing technically justified information.

5. If you have any additional comments regarding the completeness, the adequacy, and the accuracy of the proposed modifications for the SDT to consider, provide them here.
Comments: