Do not use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on the Project 2019-01 Modifications to TPL-007-3 Standard Authorization Request (SAR). Comments must be submitted by 8 p.m. Eastern, Tuesday, March 26, 2019.

Additional information is available on the project page. If you have questions, contact Senior Standards Developer, Alison Oswald (via email), or at 404-446-9668.

**Background Information**

The first version of the standard, TPL-007-1, requires entities to assess the impact to their systems from a defined event referred to as the “Benchmark GMD Event.” The second version of the standard adds new Requirements R8, R9, and R10 to require responsible entities to assess the potential implications of a “Supplemental GMD Event” on their equipment and systems in accordance with the FERC’s directives in Order No. 830. The third version of the standard adds a Canadian variance for Canadian Registered Entities 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 Background Information. This project will address 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 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).
Questions

1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

☐ Yes
☐ No

Comments:
The proposed scope of the SAR is appropriate to address FERC order 851. However, we suggest expanding the scope of the SAR to provide the Standard Drafting Team with the ability to consider making a revision to “Table 1: Steady State Planning GMD Event”. The recommendation is to add an item “d.” to the “Steady State:” criteria: “d. System steady state voltage performance shall be within the criteria established in Requirement R3.”

2. Provide any additional comments for the Standards Drafting Team to consider, if desired.

Comments: