Unofficial Comment Form

Project 2013-03 Geomagnetic Disturbance Mitigation
EOP-010-1 (Geomagnetic Disturbance Operations)

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the Standard. The electronic comment form must be completed by 8:00 p.m. ET Friday, October 18, 2013.

If you have questions please contact Mark Olson at mark.olson@nerc.net or by telephone at 404-446-9760.

The project page may be accessed by clicking here.

Background Information

The Project 2013-03 Geomagnetic Disturbance (GMD) Mitigation Standard Drafting Team posted an initial draft of the Standard EOP-010-1 (GMD Operations) for comment from June 26 to August 12, 2013. The drafting team has revised the standard based on stakeholder recommendations that the drafting team considered appropriate. The following is a summary of changes the drafting team has made:

- A new Requirement R2 has been added to the standard, which would require RCs to disseminate space weather forecast information to TOPs in the Reliability Coordinator Area (RCA). IRO-005-3.1a Requirement R3 currently provides this obligation. However, NERC Board has approved IRO-005-4 which would result in retirement of the requirement. The new Requirement R2 in EOP-010-1 will maintain the RCs responsibility for providing space weather forecast information. The implementation plan includes guidance to avoid a situation where both IRO-005-3.1a Requirement R3 and EOP-010-1 Requirement R2 are effective at the same time.

- In response to stakeholder comments that certain Requirements met Paragraph 81 criteria, administrative requirements for reviewing GMD Operating Plans and Procedures within a 36-month period and for having a copy in the control room were removed.

- Several changes in language were made to improve clarity.

- Applicability:
  - Balancing Authorities (BA) have been removed from the applicable functional entities because there are no additional steps or tasks for a BA to perform beyond their normal balancing functions to mitigate GMD events. The BA is not expected to initiate specific mitigating actions during a GMD event and would instead respond to the direction of the Transmission Operator (TOP) and Reliability Coordinator (RC). Existing standards provide the required authority for action. A whitepaper with the drafting team’s analysis is posted on the project page.
The applicable TOP has been clarified to include only those that operate power transformers with a high side wye-grounded winding with terminal voltage greater than 200 kV. This applicability statement describes the functional entity in terms of the assets that they operate, which could include non-BES assets. The applicability statement is not intended to define equipment to be protected by the Operating Procedures. The drafting team views 200 kV as the minimum network voltage for which a reliability benefit can be expected from the application of GMD Operating Procedures. A whitepaper with the drafting team's analysis is posted on the project page.

Although some stakeholders suggested that Generator Operators (GOP) be added to the standard as applicable entities, the drafting team maintains that a GOP’s Operating Procedures specifically to mitigate the effects of GMD would need to be supported by an equipment-specific study and might require the use of GMD monitoring equipment. Because it is not reasonable to assume that all GOPs have such studies or monitoring equipment, GOPs have not been added to EOP-010-1. Consistent with Order No. 779, vulnerability assessments and mitigation plans will be addressed in stage 2 of Project 2013-03. Generator Owners (GO) and GOPs will be considered for applicability with stage 2. A whitepaper with the drafting team's analysis supporting the applicability of EOP-010-1 is posted on the project page.

Some stakeholders also commented that the six-month implementation period was too short. The drafting team is sympathetic to the challenge of completing the necessary coordination in a six-month time period. However, this implementation period was suggested in FERC Order No. 779 and the drafting team lacks strong justification for a specific longer period.

This posting solicits comment on the revised EOP-010-1 standard. The standard responds to FERC Order No. 779, directing NERC to develop Stage 1 Standard(s) that require applicable entities to develop and implement Operating Procedures. Stage 1 Standard(s) must be filed by January 2014.

Questions on EOP-010-1

1. The drafting team has revised EOP-010-1 in response to stakeholder comments. Changes include removing the BA from applicability, clarifying applicability for TOPs, adding a Requirement for RCs to disseminate space weather information, removal of administrative requirements that do not benefit reliability, and clarifying changes to the language of requirements and measures. Do you agree that the revised standard correctly addresses the Stage 1 directives of Order No. 779 and is acceptable? If you do not agree or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

☐ Yes
☐ No

Comments: The Time Horizon brackets for Requirement R1 incorporate four (4) Time Horizons shown as:

It is not clear which Time Horizon goes with what part of Requirement R1. Suggest adding the clarification in a Rationale Box as follows:

Development of the GMD Operating Plan is in the Long-Term Planning Time Horizon. Maintenance of the GMD Operating Plan is in the Operations Planning Time Horizon. Implementation of the GMD Operating Plan is in the Same-Day and Real-Time Time Horizons.

2. Do you agree that the VRFs and VSLs support the reliability objectives of the standard and meet FERC and NERC guidelines? If you do not agree or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

☐ Yes
☐ No
Comments:

3. The Implementation Plan provides conditions for determining when the Requirements in EOP-010-1 become effective in each jurisdiction. Do you agree with the Implementation Plan as written? If you do not agree or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

☐ Yes
☐ No
Comments:

4. If you have any other comments for the drafting team to consider that you haven’t already mentioned, please provide them here:

Comments: The text of the "Effective Dates" section should be consistent with the EOP family of standards to reduce the variance between EOP Standards.

Regarding Requirement R1 and its Measure M1, times for completion need to be added. The Violation Severity Levels have to be revised accordingly.

The contents of the Rationale Boxes for R1 and R3 as they shown are obvious, and can be removed. In the response to Question 1 above we suggested an addition to the Rationale Box for R1.

The Rationale Box for R2 should not repeat wording from R2.