

## Rui Da Shu

---

**From:** Guy V. Zito <gzito@npcc.org>  
**Sent:** Tuesday, October 07, 2014 8:21 PM  
**To:** rsballot  
**Cc:** rscmembers; pheidrich@frcc.com; Steve@wecc.biz  
**Subject:** NERC Ballot- Project 2013-03 Geomagnetic Disturbance Mitigation

**Importance:** High

NPCC Entities and Members of the NERC Registered Ballot Body,

The NPCC Regional Standards Committee (RSC) has reviewed the subject standard currently posted for an Additional Ballot through **8pm October 8<sup>th</sup>, 2014**.

The RSC has not reached a consensus position for a ballot recommendation. The following issues precluding support by some of the NPCC participants are as follows:

- 1) The 8kv/KM remains to be seen as too conservative and will result in excess expenditure
- 2) The standard should allow Planning Coordinators to use consensus processes to address GMD performance issues with individual entities.
- 3) There remains question if the provisions for obtaining data and requirements as outlined in the MOD standards were sufficient to perform the analysis in TPL-007.
- 4) Earth Surface Impedance - Soil resistivity -values from the USGS have been questioned, especially in the lower latitudes and the accuracy of those models has come under scrutiny, especially in Florida
- 5) Benchmark GMD based on a 1 in 100 year frequency is too conservative.
- 6) Studies should allow restriction to those transformers with specific core designs that are susceptible to GIC heating

Positive changes the SDT has made in response to industry concerns may be found in the redline standard, most notably in Table 1 Footnote 3 outlines the ability to use manual load shedding as a means of meeting performance requirements during GMD events.

In light of the above and recognizing the regulatory deadline requiring NERC to file the standard with the Commission by January 2015, NPCC as the Regional Entity, will be voting "**Affirmative**" to accept the standard.

If you have any questions please contact me.

Thanks,

Guy V. Zito  
Assistant Vice President Standards  
Northeast Power Coordinating Council, Inc.  
1040 Avenue of the Americas, 10<sup>th</sup> Floor  
New York, NY 10018  
212-840-1070  
212-302-2782 Fax  
[gzito@npcc.org](mailto:gzito@npcc.org)

