

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Reliability Standard for Geomagnetic
Disturbance Operations**)

Docket No. RM14-1-000

COMMENTS OF THE ISO/RTO COUNCIL

Pursuant to Rule 213 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission¹ (the “Commission”), the ISO/RTO Council (“IRC”) submits these supporting comments in response to the Notice of Proposed Rulemaking issued by the Commission in the referenced docket on January 16, 2014, proposing approval of Reliability Standard EOP-010-1 (Geomagnetic Disturbance Operations) (the “NOPR”).²

The proposed reliability standard is designed to mitigate the effects of geomagnetic disturbances (“GMDs”) on the Bulk-Power System by requiring responsible entities to implement Operating Plans and Operating Procedures or Processes.³ The Commission also proposes to approve the associated violation risk factors and violation severity levels, implementation plan, and effective dates proposed by the North American Electric Reliability Corporation (“NERC”).⁴

I. IDENTIFICATION OF FILING PARTY

The IRC is comprised of the Alberta Electric System Operator (“AESO”); California Independent System Operator Corporation (“CAISO”); Electric Reliability Council of Texas,

¹ 18 C.F.R. § 385.213 (2013).

² See *Reliability Standard for Geomagnetic Disturbance Operations*, 146 FERC ¶ 61,015 (2014), 79 Fed. Reg. 3547 (January 22, 2014).

³ NOPR at P 1.

⁴ *Id.*

Inc. (“ERCOT”); the Independent Electricity System Operator (“IESO”); ISO New England Inc. (“ISO-NE”); Midcontinent Independent System Operator, Inc. (“MISO”); New York Independent System Operator, Inc. (“NYISO”); PJM Interconnection, L.L.C. (“PJM”); and Southwest Power Pool, Inc. (“SPP”).⁵

II. COMMENTS

The IRC supports the Commission’s proposal to approve the proposed GMD standard as submitted by NERC. With respect to the scope of the applicability of the proposed standard, the IRC believes that for the First Stage GMD Reliability Standards, the Reliability Coordinator (“RC”) and the Transmission Operator (“TOP”) are the appropriate reliability functions to which the standard should apply. As the Commission notes in the NOPR, the RC has the wide-area view and, accordingly, operational oversight of the relevant RC area.

Coordinating GMD plans and related operational responses across RC areas makes sense in terms of regional management of these circumstances in an effective and efficient manner by aligning with a wide area, but also ensuring that area aligns with the overarching operational reliability function under the standards – *i.e.*, the RC function. This captures the operational realities and efficiencies established under the NERC reliability functions and standards. Any regional coordination that did not align with the NERC reliability functions and standards would potentially require redefining relationships and roles, or establishing new ones, which would be ineffective and inefficient.

In terms of obligations, the proposed standard strikes a reasonable balance between establishing appropriate structures and interactions/relationships, and provides the requisite flexibility necessary to allow subject entities to develop their respective plans and procedures

⁵ AESO and IESO are not FERC-jurisdictional. AESO does not join in these comments.

based on their particular circumstances. As the Commission correctly notes, the impact of GMD events can differ due to regional differences, both in terms of externalities, such as geology, and in terms of system topology and structure. Accordingly, any GMD rule must accommodate such distinctions by ensuring that entities have adequate flexibility to develop plans and procedures that best meet their respective needs and circumstances. Thus, similar to the general rule for NERC standards, the GMD standard should focus on the “what,” leaving the “how” to the functional entities.

The proposed standard is reasonable in terms of both the scope of applicability and the substantive and procedural obligations. Accordingly, the IRC supports the Commission’s proposal to approve the proposed standard as filed by NERC, and looks forward to working with the Commission, NERC and other interested entities in developing the Second Stage GMD Reliability Standard(s).

III. CONCLUSION

The IRC respectfully requests that the Commission proceed in a manner consistent with the comments submitted herein.⁶

Respectfully submitted,

/s/ Matthew Morais

Matthew Morais
Director, Federal Policy
Electric Reliability Council of Texas, Inc.
7620 Metro Center Drive
Austin, Texas 78744

/s/Theodore J. Paradise

Raymond W. Hepper
Vice President, General
Counsel, and Secretary
Theodore J. Paradise
Assistant General Counsel – Operations and
Planning
Margoth R. Caley
Regulatory Counsel
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040-2841

/s/ Stephen G. Kozey

Stephen G. Kozey
Senior Vice-President, Legal and
Compliance Services, General Counsel and
Secretary
**Midcontinent Independent System
Operator, Inc.**
P.O. Box 4202
Carmel, Indiana 46082-4202

/s/ Paul Suskie

Paul Suskie
Executive Vice President, Regulatory Policy and
General Counsel
Southwest Power Pool, Inc.
201 Worthen Drive
Little Rock, AR 72223

⁶ Due to the need for final coordination among multiple ISOs/RTOs on these comments, the comments are filed just after the close of business. The IRC respectfully moves for leave to file these comments out of time, given that no party will be prejudiced thereby.

/s/ Anna McKenna

Roger E. Collanton
General Counsel
Anna A. McKenna
Assistant General Counsel-Regulatory
**California Independent System Operator
Corporation**
250 Outcropping Way
Folsom, California 95630

/s/ Craig Glazer

Craig Glazer
Vice President – Federal Government Policy
Robert Eckenrod
Senior Counsel
PJM Interconnection, LLC
1200 G Street, N.W. Suite 600
Washington, D.C. 20005

/s/ Carl F. Patka

Carl F. Patka
Assistant General Counsel
Raymond Stalter
Director, Regulatory Affairs
**New York Independent System Operator,
Inc.**
10 Krey Boulevard
Rensselaer, New York 12144

/s/ Jessica Savage

Jessica Savage
Supervisor, Government and Regulatory Affairs
Independent Electricity System Operator
Station A, Box 4474
Toronto, Ontario M5W 4E5

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