

September 25, 2018

**VIA E-MAIL**

Ms. Kirsten Walli, Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario, Canada  
M4P 1E4

**Re:** Independent Electricity System Operator / Hydro One Networks Inc.  
Application for Review of NERC Reliability Standard TPL-007-2  
Ontario Energy Board: File No.: EB-2018-0119

Dear Ms. Walli:

Intervenor North American Electric Reliability Corporation (NERC) hereby provides comments in response to the Ontario Energy Board (OEB) Procedural Order No. 1, filed in the above-referenced docket on September 11, 2018. In the Order, the OEB seeks submissions regarding whether proposed Reliability Standard TPL-007-2 - *Transmission System Planned Performance for Geomagnetic Disturbance Events* should be stayed in Ontario pending the OEB's determination of the application filed by the Independent Electricity System Operator (IESO) and Hydro One Networks Inc. (Hydro One).

NERC supports a stay of the proposed standard in Ontario pending the OEB's review. Such a stay would not harm reliability, as entities in Ontario are currently implementing requirements to perform GMD Vulnerability Assessments under the first version of the standard, TPL-007-1.

Also, and as noted in the Order, the IESO and Hydro One have submitted a standard authorization request to NERC to seek a variance to the proposed standard. This request was accepted, and a standard drafting team consisting of individuals from several Canadian provinces was appointed to develop a TPL-007 Canadian variance in accordance with NERC's standard development process. An initial draft of the variance was posted for informal comment from August 10, 2018 through September 9, 2018. The standard drafting team is currently reviewing the submitted comments and preparing a second draft of the variance. NERC anticipates that the draft variance will be posted for a 45-day public comment period and ballot beginning in October 2018.<sup>1</sup>

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<sup>1</sup> Additional information is available on the Project 2018-01 Canadian-specific Revisions to TPL-007-2 project page on NERC's website: <https://www.nerc.com/pa/Stand/Pages/Project201801CanadianspecificRevisionstoTPL0072.aspx>.

Any questions regarding this filing may be directed to Lauren A. Perotti, NERC Counsel, at (202) 400-3000 or [lauren.perotti@nerc.net](mailto:lauren.perotti@nerc.net).

Sincerely,

/s/ Lauren A. Perotti

Lauren A. Perotti

*Counsel for the North American Electric  
Reliability Corporation*

cc: Michael Bell, Case Manager  
Lawren Murray, OEB Counsel

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon all parties listed in Schedule A of Procedural Order No. 1 in this proceeding. Dated at Washington, D.C. this 25th day of September, 2018.

*/s/ Lauren A. Perotti*

Lauren A. Perotti  
*Counsel for the North American Electric Reliability  
Corporation*