

April 1, 2019

VIA Email, Courier and RESS

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
27th Floor 2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli:

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

The Independent Electricity System Operator (“IESO”) and Hydro One Networks Inc. (“Hydro One”) (together the “Applicants”) wish to provide the Ontario Energy Board (“OEB”) with a summation of recent developments, which occurred since filing their joint application, and which are directly relevant to the OEB review processes pertaining to TPL-007-2 and TPL-007-3, for consideration.

In approving the Applicants’ request to stay TPL-007-2, the OEB noted that it was “*persuaded by the stay request from the Applicants since it provided for an efficient and effective opportunity for the Canadian Variance process to run its course given that a Reliability Standard is currently in force that addresses Geomagnetic Disturbance Events and that the Canadian Variance process may render the Proposed Standard application moot*”.¹

The Applicants now wish to inform the OEB that the Canadian Variance process has concluded with a positive outcome. NERC Reliability Standard TPL-007-3, which is the Canadian-specific Revision to TPL-007-2, was developed and achieved industry support. On February 20, 2019, NERC filed TPL-007-3 with the OEB. As stated in NERC’s petition² to the OEB, “*this Variance provides an option by which Canadian registered entities may leverage operating experience, observed GMD effects, and ongoing research to define alternative benchmark GMD events or supplemental GMD planning event(s) for their GMD Vulnerability Assessments. This Variance also recognizes the unique regulatory frameworks specific to Canadian jurisdictions,*

¹ EB-2018-0119, Decision and Order, October 31, 2018, page 4

² PETITION OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION FOR APPROVAL OF PROPOSED RELIABILITY STANDARD TPL-007-3, February 20, 2019



particularly with respect to provincial processes for approving investments identified in Corrective Action Plans."

On February 21, 2019, as required by the *Electricity Act, 1998*, the IESO publically posted TPL-007-3 to its website, thereby initiating a 21-day window, within which any Ontario Market Participant and the IESO may have requested an OEB review of the Standard; no such request was advanced.

For completeness, the Applicants note that the OEB remains within its own 120-day window (ending June 21, 2019), within which the OEB may, on its own motion, initiate a review of TPL-007-3. In the absence of such a review, NERC Reliability Standard TPL-007-3 and its Implementation Plan will become effective in Ontario, superseding TPL-007-2. In such a case, the Applicants' joint application, seeking an OEB review of NERC Reliability Standard TPL-007-2, would no longer be necessary.

All of which is respectfully submitted.

Yours truly,

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