

## Consideration of Issues and Directives

### Project 2019-01 Modifications to TPL-007-3

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Issue or Directive	Source	Consideration of Issue or Directive
<p>Modify the provision in Reliability Standard TPL-007-2, Requirement R7.4 that allows applicable entities to exceed deadlines for completing corrective action plan tasks when “situations beyond the control of the responsible entity [arise]”, by requiring that NERC and the Regional Entities, as appropriate, consider requests for extension of time on a case-by-case basis. Under this option, responsible entities seeking an extension would submit the information required by Requirement R7.4 to NERC and the Regional Entities for their consideration of the request.</p>	<p>FERC Order No. 851, P 5 and P 50</p>	<p>The SDT proposed the modified language in Requirement R7.3 and R7.4 to require time extensions for completing CAPs be submitted to the ERO for approval. The proposed modified language reads as follows:</p> <p>7.3. Include a timetable, subject <del>to revision by the responsible entity approval for any extension sought under in</del> Part 7.4, for implementing the selected actions from Part 7.1. The timetable shall:</p> <ul style="list-style-type: none"> <li>7.3.1. Specify implementation of non-hardware mitigation, if any, within two years of development of the CAP; and</li> <li>7.3.2. Specify implementation of hardware mitigation, if any, within four years of development of the CAP.</li> </ul> <p>7.4. Be <u>submitted to the Compliance Enforcement Authority (CEA) with a request for extension of time</u> <del>revised if situations beyond the control of the</del> responsible entity <del>is unable to determined in Requirement R1 prevent implementation of</del> the CAP within the timetable <del>for implementation</del> provided in Part</p>

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		<p>7.3. The <del>submitted revised</del> CAP shall document the following, <del>and be updated at least once every 12 calendar months until implemented:</del></p> <p>7.4.1 Circumstances causing the delay for fully or partially implementing the selected actions in Part 7.1 <u>and how those circumstances are beyond the control of the responsible entity;</u></p> <p><del>7.4.2 Description of the original CAP, and any previous changes to the CAP, with the associated timetables(s) for implementing the selected actions in Part 7.1; and</del></p> <p><del>7.4.3</del> <u>7.4.2</u> Revisions to the selected actions in Part 7.1, if any, including utilization of Operating Procedures, if applicable, <del>and the updated timetable for implementing the selected actions.</del></p> <p><del>7.4.4</del> <u>7.4.3</u> Updated timetable for implementing the selected actions in Part 7.1.</p>
<p>Submit modifications to Reliability Standard TPL-007-2 to require corrective action plans for assessed supplemental GMD event vulnerabilities.</p>	<p>FERC Order No. 851, P 4 and P 39</p>	<p>The SDT drafted TPL-007-4 Requirement R11 to address require CAPs for supplemental GMD vulnerabilities and to require extensions to these plans to be approved by NERC and the Regional Entities, as appropriate, <del>in where</del> situations beyond the control of the responsible entity <u>prevent implementation of the CAP in the two and four year timelines provided in the standard for non-hardware and hardware</u></p>

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		<p><u>mitigation, respectively.</u> This language is the same as the modified Requirement R7 which addresses CAPs for the benchmark GMD vulnerability assessment. Requirement R8 was also modified to remove the original R8.3 which stated “an evaluation of possible actions designed to reduce the likelihood or mitigate the consequences and adverse impacts of the event(s) shall be conducted.”</p>