

Comparison between NYSRC Rule C.4 R2 – Operating During a Severe Magnetic Disturbance and NERC Standard EOP-010 – Geomagnetic Disturbance Operations.

NERC Purpose	NYSRC Rule	Comments / Conclusion
To mitigate the effects of geomagnetic disturbance (GMD) events by implementing Operating Plans, Processes, and Procedures.	The NYISO shall maintain procedures and systems which allow for more stringent than normal operating restrictions prior to, and during severe weather conditions and solar magnetic disturbances.	The intent of the NERC Purpose Statement and NYSRC Rule Statement is the same
NERC Requirement	NYSRC Requirement	Comments / Conclusion
<p>R1 Each Reliability Coordinator shall develop, maintain, and implement a GMD Operating Plan that coordinates GMD Operating Procedures or Operating Processes within its Reliability Coordinator Area. At a minimum, the GMD Operating Plan shall include:</p> <p>R 1.1 A description of activities designed to mitigate the effects of GMD events on the reliable operation of the interconnected transmission system within the Reliability Coordinator Area.</p> <p>1.2 A process for the Reliability Coordinator to review the GMD Operating Procedures or Operating Processes of Transmission Operators within its Reliability Coordinator Area.</p>	<p>R2. Operation during Severe Solar Magnetic <i>Disturbance</i></p> <p>During periods when a severe solar magnetic <i>disturbance</i> (“SMD”) exists or is forecast to occur, it may be necessary for the <i>NYISO</i> and <i>Transmission Owners</i> to take steps in addition to those procedures normally followed to maintain system <i>security</i>. Such steps may include, but are not limited to, restoration of transmission facilities that are out of service, cancellation of scheduled outages, and adjustment of <i>reactive power</i> dispatch.</p> <p>The <i>NYISO</i> shall enter this mode of operation for those portions of the <i>NYS Bulk Power System</i> affected by an SMD when requested to do so by the affected <i>Transmission Owners</i>, or at any other times when it deems necessary to preserve the <i>security</i> and <i>reliability</i> of the <i>NYS Bulk Power System</i>.</p>	<p>NERC R1, R1.1, and R1.2 and NYSRC R2 both require the NYISO to be prepared to implement more stringent operations in case of a GMD, but NERC R1, R1.1, and R1.2 are more specific. The NYISO T&D Manual sec 4.2.11 details the procedures and actions required by NERC (hence, those required by NYSRC).</p> <p>There is a companion requirement in EOP-010 R3 for all TOPs to have GMD procedures, while R2 obligates the NYISO to review those TOP procedures.</p>

<p>R2. Each Reliability Coordinator shall disseminate forecasted and current space weather information to functional entities identified as recipients in the Reliability Coordinator's GMD Operating Plan.</p>		<p>It appears NYSRC R2 is no longer needed.</p>
NERC	NYSRC	Comments / Conclusion
<p>R1 Each Reliability Coordinator shall develop, maintain, and implement a GMD Operating Plan that coordinates GMD Operating Procedures or Operating Processes within its Reliability Coordinator Area. At a minimum, the GMD Operating Plan shall include:</p>	<p>R3. The <i>NYISO</i> shall maintain procedures and systems which allow for more stringent operating restrictions prior to, and during, severe weather conditions and solar magnetic <i>disturbances</i>. The <i>NYISO</i> shall notify the <i>NYSRC</i> of any changes to these procedures and systems.</p>	<p>NERC EOP-010 R1 clearly requires the same procedures envisioned by NYSRC C.4 R3. The reference to GMDs in C.4 R3 should be removed, as it appears it is no longer needed.</p>