

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

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Reliability Standards for)	Docket No. RM15-11-000
Transmission System Planned)	
Performance for Geomagnetic)	
Disturbances)	

**ADDITIONAL COMMENTS OF THE EDISON ELECTRIC INSTITUTE,
AMERICAN PUBLIC POWER ASSOCIATION, ELECTRICITY
CONSUMERS RESOURCE COUNCIL, AND NATIONAL RURAL
ELECTRIC COOPERATIVE ASSOCIATION**

On behalf of our respective memberships, the Edison Electric Institute, American Public Power Association, Electricity Consumers Resource Council, and National Rural Electric Cooperative Association (collectively, the “Trade Associations”), hereby provide brief late-filed comments in support of the filing made on October 22, 2015 in this docket by the North American Electric Reliability Corporation (“NERC”), responsive to the September 2015 technical paper prepared by the Los Alamos National Laboratory (“Los Alamos”) titled *Review of the GMD Benchmark Event in TPL-007-1* (“Los Alamos report”). As NERC states in its October 22 filing, the Los Alamos report offers another important contribution in the consideration of the complex technical issues involved with seeking to develop a mathematical depiction of a 100-year benchmark GMD event. EEI supports the NERC comments regarding reference peak geoelectric field, latitudinal scaling, and earth conductivity.

The Trade Associations strongly believe that the Los Alamos report offers additional evidence on the need to continue supporting scientific inquiry on GMD phenomena, including GMD monitoring and data gathering, and modeling. Continued inquiry will inform future considerations of the issue by NERC and other potentially affected critical infrastructure industries in this country. As the record in this docket suggests, the Trade Associations appreciate that capable and credible scientists can have legitimate differences over how to characterize in mathematical terms an intensive GMD wave form that may exhibit wildly varying physical qualities over a very large geographic area and for a fairly long period of time. While scientific inquiry will continue to evolve, the Trade Associations view the technical analyses performed in support of TPL-007 as offering a technically sound approach that has been developed in an open and transparent process, a process overseen by NERC, and ultimately by the Commission.

The NERC October 22 NERC filing provides concise responses to the three critical issue areas for defining the 100-year benchmark, responses supported by the Trade Associations. We do not view the Los Alamos report as providing a compelling basis for the Commission to amend its proposal to approve TPL-007 or to direct NERC to reconsider the findings and conclusions of the standards development project.

The Trade Associations continue to recommend timely approval of TPL-007 as proposed by the Commission in this docket.

Respectfully submitted,

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