

## Comment Report

**Project Name:** 2023-08 Modifications of MOD-031 Demand and Energy Data | SAR  
Comment Period Start Date: 10/10/2023  
Comment Period End Date: 11/8/2023  
Associated Ballots:

There were 36 sets of responses, including comments from approximately 107 different people from approximately 81 companies representing 10 of the Industry Segments as shown in the table on the following pages.

## **Questions**

- 1. Do you agree with the proposed scope as described in the Project 2023-08 SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation and explanation.**
- 2. Provide any additional comments for the drafting team to consider, if desired.**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
MRO	Anna Martinson	1,2,3,4,5,6	MRO	MRO Group	Shonda McCain	Omaha Public Power District (OPPD)	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Jay Sethi	Manitoba Hydro (MH)	1,3,5,6	MRO
					Jaimin Patal	Saskatchewan Power Corporation (SPC)	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Marc Gomez	Southwestern Power Administration (SWPA)	1	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					George Brown	Pattern Operators LP	5	MRO
					Larry Heckert	Alliant Energy (ALTE)	4	MRO
					Terry Harbour	MidAmerican Energy Company (MEC)	1,3	MRO
					Bryan Sherrow	Board Of Public Utilities (BPU)	1	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
Michael Ayotte	ITC Holdings	1	MRO					
	Bobbi Welch	2	MRO,RF,SERC		Monika Montez	CAISO	2	WECC

Midcontinent ISO, Inc.				ISO/RTO Council Standards Review Committee Project 2023-08 Modifications to MOD-031 SAR	Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
					Helen Lainis	Independent Electricity System Operator	2	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Bobbi Welch	MISO	2	RF
					Greg Campoli	NYISO	2	NPCC
					Elizabeth Davis	PJM	2	RF
					Charles Yeung	SPP	2	MRO
Tacoma Public Utilities (Tacoma, WA)	Jennie Wike	1,3,4,5,6	WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					John Nierenberg	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
FirstEnergy - FirstEnergy Corporation	Mark Garza	1,3,4,5,6		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF

					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Southern Company - Southern Company Services, Inc.	Pamela Frazier	1,3,5,6	MRO,RF,SERC,Texas RE,WECC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Jim Howell, Jr.	Southern Company - Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
					Leslie Burke	Southern Company - Southern Company Generation	5	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Alain Mukama	Hydro One Networks, Inc.	1	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC

Randy Buswell	Vermont Electric Power Company	1	NPCC
James Grant	NYISO	2	NPCC
John Pearson	ISO New England, Inc.	2	NPCC
Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC
Randy MacDonald	New Brunswick Power Corporation	2	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
David Burke	Orange and Rockland	3	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
David Kwan	Ontario Power Generation	4	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
Glen Smith	Entergy Services	4	NPCC
Sean Cavote	PSEG	4	NPCC
Jason Chandler	Con Edison	5	NPCC
Tracy MacNicoll	Utility Services	5	NPCC
Shivaz Chopra	New York Power Authority	6	NPCC

					Vijay Puran	New York State Department of Public Service	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
					Joshua London	Eversource Energy	1	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	MRO,SPP RE,WECC	SPP RTO	Shannon Mickens	Southwest Power Pool Inc.	2	MRO
					Sheri Maxey	Southwest Power Pool Inc.	2	MRO
					Mia Wilson	Southwest Power Pool Inc.	2	MRO
					Mason Favazza	Southwest Power Pool Inc.	2	MRO
ReliabilityFirst	Stephen Whaite	10	RF	ReliabilityFirst Ballot Body Member and Proxies	Lindsey Mannion	ReliabilityFirst	10	RF
					Stephen Whaite	ReliabilityFirst	10	RF

1. Do you agree with the proposed scope as described in the Project 2023-08 SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation and explanation.

Thomas Foltz - AEP - 3,5,6

Answer No

Document Name

Comment

AEP appreciates the SAR's perceived need to obtain DER data for the purpose of ensuring accurate modeling, however we are concerned by the inability of TPs and DPs to obtain this type of data, as well as by the level of data granularity that would eventually be required.

AEP is concerned by any obligations which would be developed requiring TPs (as an "intermediary" or otherwise) or DPs to obtain DER data and/or forecasts that are not specifically related to their own customers. In many cases, this would include data from sources into which the TP and DP would have no visibility, nor would the TP and DP have any ability to compel the provision of such data. The entities in possession of the data would have no obligation to provide it, as they would not be registered as NERC Functional Entities.

While the concept of obtaining DER data may appear reasonable on the surface, there are several factors at play which would make its execution extremely challenging. The proposed SAR includes a variety of phrases such as DER Capacity, forecasted gross demand, forecasted DER information, and forecasted DER capacity to name just a few. The generic phrase "DER data" is also used, and because of this and the previous phrases, it is not clear at this stage what the expected levels of data granularity will eventually be. Further increasing these difficulties would be the challenges an entity would have in accessing or collecting the required data (including infrastructure limitations as well as seasonal and/or geographical differences where those DER assets reside). The level of data granularity, coupled by the difficulties mentioned, will collectively determine whether the eventual obligations would be achievable.

Likes 0

Dislikes 0

Response

Srikanth Chennupati - Entergy - 1,3,5,7 - SERC

Answer No

Document Name

Comment

1. Making the transmission planner as conduit to this DER data creates a tremendous amount of work for TP and does not bring any appreciable benefit.
2. We have no control over Third Party DPs in our footprint to provide Forecasted DER Data.
3. The DP should be responsible for providing this data to PC.

Likes 0

Dislikes 0



**Response**

**LaTroy Brumfield - American Transmission Company, LLC - 1**

**Answer** No

**Document Name**

**Comment**

ATC agrees that DER data is critical to bulk power system reliability and should be readily available to the PC and TP from the DP upon request. However, as a TP, ATC does not have access to DER data that is not supplied by the DP. Also, ATC does not 'project DER capacity\*' for its planning area, so double counting would not be an issue. Including a requirement that the TP act as an intermediary for passing historic and / or project DER data from the DP to the PC would ultimately be burdensome and likely ineffective as ATC does not have transparency into the DP's load and DER data. ATC would not be able to answer any substantive questions about this data.

While it is agreed that the PC and TP should have DER information, it should be collected through direct interactions between the DP and the PC (via existing processes) and the TP respectively, not through an intermediary.

Additionally, ATC requests clarity on what is meant by "projected DER capacity" in the proposed SAR. Is this projected DER growth or projected ability of the system to accommodate additional DER? This term should be clarified in the SAR.

Further, not every TP is part of an integrated utility. Information collected by the PC / BA under existing MOD-031-3 could be considered market data. Likewise, the DER data proposed to be included under the SAR would also be considered market data.

ATC does not perform market functions and should not receive market data. ATC does not have any agreements in place to receive market data. This process should be between market participants and market operators.

If the SAR or a subsequent Reliability Standard does require the TP to collect DER data from the DP and transmit it to the PC, the SAR should make clear that the TP should not be held responsible for any data that was not provided or inaccurate DER data. Further, there must be mechanisms that require the DPs to provide the specified DER data to necessary entities within the Reliability Standard itself.

Likes 0

Dislikes 0

**Response**

**Ben Hammer - Western Area Power Administration - 1,6**

**Answer** No

**Document Name**

**Comment**

The proposed scope should be solely limited to adding a MOD-031 requirement for the Distribution Provider to provide existing and forecasted demand-modifying DER data to its Planning Coordinator or Balancing Authority that identifies a need for the collection of Total Internal Demand, Net Energy for Load, and Demand Side Management data. To add a similar requirement of Transmission Planners is an overreach and implies a data collection obligation for which Transmission Planners have no force to obtain. Furthermore, the addition of a DER data requirement from Distribution Providers is only a partial solution which will allow significant reliability gaps to persist.

A key recommendation in the NERC Reliability and Security Technical Committee (RSTC) subcommittee-approved “Model Verification of Aggregate DER Models used in Planning Studies - Reliability Guideline” developed by the System Planning Impacts from Distributed Energy Resources Working Group (SPIDERWG) was:

“TPs, PCs, TOs, and other applicable entities that may need DER information should coordinate with DPs for facilities connected to distribution systems to determine the necessary measurement information that would be of use for DER modeling and model verification and jointly develop requirements or practices that will ensure this data is available. As the TPs, PCs, and TOs are dependent on the DP to have the data made available, this will likely require actions from state regulatory bodies and DPs to establish requirements to gather this information” (page 7 of 61).

The NERC Project 2023-08 SAR team should consider that Transmission Planners cannot be held accountable for DER data that they have no cognizance of and are equally as reliant upon the Distributions Providers to disseminate, as are the Planning Coordinators, Balancing Authorities, and Transmission Owners.

Additionally, the NERC Project 2023-08 SAR team should remember that most DER are smaller than the BES resource threshold or reside on a distribution system. The threshold for an entity to be registered as a Distribution Provider is 75 MW of load. This implies that the majority of DERs are and will be connected to systems outside the scope and visibility of direct interconnections to the BES, as well as beyond existing Distribution Providers. To emphasize this reality: as of 15 May 2023, there were 314 Distribution Providers registered with NERC (excluding UFLS-only DPs). Of those DPs, 96 were not otherwise registered as either a Planning Coordinator, Transmission Planner, or Transmission Owner. While it may be misunderstood that only 96 Distribution Providers may become newly applicable and participatory providing existing and forecasted DER data if proposed changes to MOD-031 move forward, this ignores that the latest EIA 861 data (collected in 2021; published in 2022) reflects about 1,190 distribution utilities reflecting almost 197,000 distribution circuits in the continental US. In other words, it may be reasonable to conclude that 74% of the distribution utilities in the US do not meet the NERC registration threshold. Furthermore, Planning Coordinators, Transmission Planners, and Transmission Owners have no regulatory relationship with these unregistered entities and cannot be held responsible for DER data for which that are not aware.

In June 2022, NERC published its “Inverter-Based Resource Strategy” that recognized efforts necessary to analyze the breakdown of resource size, location, type, and applicability with the BES definition to make a determination of whether the current BES threshold should be updated to reflect the changing resource mix” (page 9 of 10). Subsequently, the NERC Member Representatives Committee (MRC) and Board of Trustees (BOT) technical session on inverter-based resources in February 2023 emphasized the need for a focus on functional registration noting: “industry is increasingly challenged with addressing reliability issues for unregistered inverter-based resources, and those resources are reaching critical mass in some parts of the country. The lack of requirements currently imposed on those resources creates local and regional reliability risks to the BPS in aggregate. This issue compounds in many areas with the growing presence of distributed energy resources (DERs) connected to the distribution system.” In response to the FERC directive “Registration of Inverter-based Resources”, NERC filed a proposal to modify its Rules of Procedure to “include a new function comprised of owners of IBRs interconnected to the BPS.” The Generator Owner – Inverter-Based Resource (GO-IBR) registration would include “owners of IBRs which have aggregate nameplate capacity of less than or equal to 75 MVA and greater than or equal to 20 MVA interconnected at a voltage greater than or equal to 100 kV; or Owners of IBRs which have aggregate nameplate capacity of greater than or equal to 20 MVA interconnected at a voltage less than 100 kV.” Given the anticipated GO-IBR functional registration, the NERC Project 2023-08 SAR team should consider requiring Distribution Providers and Generator Owners – Inverter-Based Resource, not Transmission Planners, be responsible to provide existing and forecasted DER data to the Planning Coordinator or Balancing Authority.

Transmission Planners are not intermediaries, couriers, or nannies on behalf of Planning Coordinators and Balancing Authorities. No doubt, the industry faces a very real challenge collecting data for existing and forecasted distribution system and behind-the-meter DER. The solution to this problem is assuredly not making Transmission Planners intermediate conduits of DER information, nor is this problem well-communicated by implying that Transmission Planners are uniquely positioned to collect and pass on DER information. Do not make consumers of DER data (Transmission Planners) the obligatory owners and stewards of that data.

Likes	0
Dislikes	0

**Response**

**Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6**

**Answer** No

**Document Name**

**Comment**

AZPS supports the following comments that were submitted by EEI on behalf of their members:

EEI does not support the current SAR as written. The Industry Needs section states that MOD-031 needs to be updated to provide authority “to collect Demand, energy and related data to support reliability studies and assessments” yet requirement R1 already provides the PC and BA the authority to collect Total, Internal Demand, Net Energy for Load and Demand Side Management data from TPs, BAs and DPs. What is unclear is what is included in the “related data.” The intent and extent of this related data needs to be clarified before this SAR moves forward. While EEI does not dispute that DPs need to provide data on aggregate amounts of DER resources that impact Demand at points of interconnection (POIs), gathering specific data on DER resources (except those bidding into the organized market) exceeds NERC regulatory authority. We note that Section 215 is clear “facilities used in the local distribution of electric energy” are not included in the Bulk Power System definition and hence not under NERC authority. To address this issue, the SAR should be modified to limit these data requests to aggregate DERs impacts at the POIs and not include detailed data on DERs used in local distribution.

The proposed SAR as written includes DP obligations that exceed NERC authority. DERs that are used for supporting local distribution and are not intended to support the BPS fall outside of NERC authority. However, EEI recognized that there is a need to provide details on the impacts of aggregated DER impacts on Demand at the Point of Interconnection. For this reason, we agree that DPs should provide details on localized impacts on Demand due to DERs on their system. However, the level of detail included in this SAR is inappropriate, exceeding what is allowed by Section 215 and potentially places distribution planning outside of State regulation. To address these concerns, we offer the following suggested edited changes to the Detailed Description Section of the SAR below in boldface:

**MOD-031 revisions should be limited to specific language that would obligate DPs to provide DER data that identifies aggregated impacts on load Demand at Points of Interconnection (POI). TPs should be provided limited authority to act as an intermediary, if needed, to assist in helping the DP provide this data to the PC. In order to address PC concerns regarding entity’s forecast consistency with other interconnected DPs, the standard should make it clear that DPs and PCs should work together to ensure aggregated DER data meets the PC’s need to obtain existing and forecasted gross demand is met. The details of this process should not be specifically detailed in MOD-031-3 language but left to the responsible entities to address based on existing regional and responsible entity processes.**

Likes 0

Dislikes 0

**Response**

**Michael Foley - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6**

**Answer** No

**Document Name**

**Comment**

Con Edison does not support the proposed SAR. The proposed SAR exceeds the limits of NERC’s jurisdiction. There is somewhat of a comingling of requirements across the bulk power

and distributions systems. The level of DER details required in the SAR is beyond the scope of MOD-031 and should be dealt with in another or new MOD Standard that governs DERs and DER resource owner obligations. The proposed SAR appears to put the burden of very granular DER data reporting and forecasting on the DP, who relies on forecast information provided by DER resource owners. For a DP to manage the data, ever changing forecasts, points of interconnection, performance of DERS, and how they are treated (as supply or as negative load modifiers) will require additional resources and software applications. Such incremental costs are not likely considered in current DP electric rates.

Likes 0

Dislikes 0

**Response**

**Hillary Creurer - Allete - Minnesota Power, Inc. - 1**

**Answer**

No

**Document Name**

**Comment**

Minnesota Power supports EEI's comments.

Likes 0

Dislikes 0

**Response**

**Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group**

**Answer**

No

**Document Name**

**Comment**

The MRO NERC Standards Review Forum (NSRF) appreciates the opportunity to comment and offers the following recommendations.

**Clarify the data that must be provided:** The MRO NSRF believes it would be helpful for the SDT to provide a technical reference document describing the data being sought under MOD-031. For example, the word "capacity" as used in the 2nd paragraph on page 4:

Project 2022-02 covers the steady-state and dynamics data requirements pertaining to DERs, while this SAR is proposing a project to cover current and forecasted **capacity** projections for DERs.

Is “capacity” intended to mean nameplate capacity or something else? How does this “capacity” differ from that being collected pursuant to MOD-032? The MRO NSRF requests this be clarified. It is difficult to agree with the proposed scope not knowing what data is being sought.

**Clarify which entities provide the data:** For Planning Coordinators and Transmission Planners to have comprehensive and accurate models reflecting accurate and up-to-date information, the entities that own or have access to the data must be required to provide it as described under the “Project Scope” on page 2 of the SAR. There, the SAR “requires DPs and TPs to provide existing and forecasted DER data when the PC determines the need.” The MRO NSRF supports this provision as, in many cases, the PC will not have direct access to or ownership of DER data whereas, in most cases, the TP and/or DP will.

The MRO NSRF requests the SAR be clear and consistent on this point throughout the SAR. To that end, the MRO NSRF requests the below sections of the SAR be revised to align with the Project Scope on page 2:

Industry Need (page 1):

*MOD-031-3 should be revised to require DPs and TPs to provide existing and forecasted DER information to the PC when the PC determines the need. The TP should have the ability to act as an intermediary. Therefore, DPs should also be required to provide data to the TP upon request.*

Purpose or Goal (page 2):

*The purpose of this SAR is to revise and modify MOD-031-3 in the “Requirements and Measurements” section so that DPs and TPs are required to provide existing and forecasted DER information to the PC when the PC determines the need.*

Detailed Description (page 2):

*TPs should be an intermediary to provide this data from DPs to the PC as the DER from the DP affects the existing and forecasted demand amount of the TP’s planning area as well as the TP’s projected DER capacity for their planning area. To make this possible, DPs will be required to provide DER information to the TP upon request.*

Likes 0

Dislikes 0

### Response

**Kacie Fischer - Oncor Electric Delivery - 1 - Texas RE**

**Answer**

No

**Document Name**

**Comment**

Oncor’s foremost concern is directed towards the role of the TP in the data-gathering process as it relates to DER data. The SAR states that the TPs should act as an intermediary to the DPs for PC request for existing and forecasted DER capacity information. Oncor currently gathers data from DERs requesting interconnection and parallel operation with our distribution system; and Oncor submits DER data in the established Annual Load Data Request (ALDR) process. In locations where Oncor is the Distribution Provider, the ALDR process for gathering and submitting the DER data is well established. However, for scenarios where the DER is connected to another DP behind a wholesale point-of-delivery (that is a DP owned by another company such as a Coop or Municipality), retrieving DER data with the required accuracy would not be realistic. The ongoing SAR for MOD-032-2

(Project 2022-02) had similar language placing the onus of DER data gathering on the TP regardless of barriers; but in the most recent redline the SDT added language softening the TP's DER data gathering responsibilities. We ask that similar language be added if TPs must be involved in gathering DER data from the DPs (though we would rather have the DERs submit information themselves). Examples from Project 2022-02: 1) deleting the Transmission Owner responsibility when requesting aggregate demand for steady-state and dynamic modeling, 2) adding the following language to a footnote allowing the PC/TP to jointly develop reporting procedures: "A Distribution Provider is responsible for providing this information, generally through coordination with the Transmission Owner *or as specified in the joint PC/TP modeling data requirements and reporting procedures developed per R1.*"

Likes 0

Dislikes 0

### Response

#### Marcus Sabo - International Transmission Company Holdings Corporation - 1 - MRO,RF

**Answer** No

**Document Name**

#### Comment

ITC supports EEs comments pertaining to this SAR. Additionally, ITC does not concur that there is a need to require the TP to be an intermediary in the transfer of information between the DP and the PC. It is not clear in the SAR nor the SPIDERWG NERC Reliability Standards Review why the TP, acting as intermediary, would provide results that are better than a clear and concise request from the PC to the DP. The requirement for the TP to receive information from the DP and make the necessary modeling for the PC is going to add a level of complexity to a process that doesn't justify it. Additionally, the proposed path of information just adds to the potential for inadvertent errors in this data.

Likes 0

Dislikes 0

### Response

#### John Pearson - ISO New England, Inc. - 2

**Answer** No

**Document Name**

#### Comment

The NERC Glossary of Terms Used in NERC Reliability Standards does not have a definition for DER. We assume that the SAR is using the new NERC MOD-032 definition of DER and the revised standard will codify this with the standard revisions. We also assume that the drafting team will provide language that allows each PC to tailor the request for area needs. MOD-031 data collection should also be coordinated with other ongoing MOD Standard changes to collect DER performance information. It may be best to combine the SARs for the MOD-031 and MOD-032 Standards to ensure that PCs can obtain DER forecast and performance data in a coherent manner; otherwise, NERC should at least ensure that the two drafting teams coordinate on changes to both Standards.

Likes 0

Dislikes 0

**Response**

**Alan Kloster - Evergy - 1,3,5,6 - MRO**

**Answer** No

**Document Name**

**Comment**

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the MRO NSRF for question #1.

Likes 0

Dislikes 0

**Response**

**Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter**

**Answer** No

**Document Name**

**Comment**

FirstEnergy agrees with and parallels comments from AEP.

We are concerned by the inability of TPs and DPs to obtain this type of data, as well as by the level of data granularity that would eventually be required.

FirstEnergy is concerned by any obligations which would be developed requiring TPs (as an “intermediary” or otherwise) or DPs to obtain DER data and/or forecasts that are not specifically related to their own customers. In many cases, this would include data from sources into which the TP and DP would have no visibility, nor would the TP and DP have any ability to compel the provision of such data. The entities in possession of the data would have no obligation to provide it, as they would not be registered as NERC Functional Entities.

While the concept of obtaining DER data may appear reasonable on the surface, there are several factors at play which would make its execution extremely challenging. The proposed SAR includes a variety of phrases such as DER Capacity, forecasted gross demand, forecasted DER information, and forecasted DER capacity to name just a few. The generic phrase “DER data” is also used, and because of this and the previous phrases, it is not clear at this stage what the expected levels of data granularity will eventually be. Further increasing these difficulties would be the challenges an entity would have in accessing or collecting the required data (including infrastructure limitations as well as seasonal and/or geographical differences where those DER assets reside). The level of data granularity, coupled by the difficulties mentioned, will collectively determine whether the eventual obligations would be achievable.

Likes 0

Dislikes 0

**Response**

**Matt Lewis - Lower Colorado River Authority - 1,5**

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>LCRA TSC understands the need to obtain DER data to improve the outcomes of reliability studies and assessments, however LCRA TSC is concerned about the type of data described in the SAR and the ability of TPs to obtain that data, in particular with unregistered Distribution Providers.</p> <p>LCRA TSC has minimal visibility into the distribution system and has concern with the challenge of obtaining and/or providing “forecasted” gross demand, DER information, and DER capacity to the PC.</p> <p>LCRA TSC also doesn’t see the reliability improvement of having the Transmission Planner act as an intermediary between the PC and DP. PC’s can ask for that information directly from the DPs. This requirement would create an increased compliance burden on TPs with limited reliability improvement.</p> <p>Lastly, LCRA TSC requests that NERC Project 2023-08 (Modifications to MOD-031) work is deferred until work on NERC Project 2022-02 (Modification to MOD-032) is complete. This would allow more clarity on what DER information will be needed to perform steady state and dynamic studies.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Daniel Gacek - Exelon - 1,3</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>Exelon concurs with the comments submitted by the EEI.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>The MOD-031 standard was initially developed under Project 2010-04 (MOD-031-1) in an effort to consolidate five “MOD C” standards (MOD-016-1.1, MOD-017-0.1, MOD-018-0, MOD-019-0.1, and MOD-021-1). The MOD-016 standard included requirements for the Regional Reliability Organization that touched on other standards, including MOD-017, MOD-018, MOD-019 and MOD-021. To some extent, the data desires of the ERO/FERC have</p>	



been retained in MOD-031-3 (see Requirement R3) and have influenced the data specified in R1 Parts 1.3 through 1.5 that help support data collection for the ERO's annual long-term reliability assessments and the FERC Form 714 filing.

The proposed scope states that *"SPIDERWG recommends that a Standard Drafting Team (SDT) review and modify MOD-031-3, as necessary, such that the Standard requires DPs and TPs to provide existing and forecasted DER data when the PC determines the need as it is becoming critical to know how much actual demand is on the system given the amount being served by embedded generation."* It's unclear what data will be requested or required by the proposed changes, however it appears that DER aggregator/developers may be the responsible entity (although there is no registration for those entities) to provide the data and not the DP.

The proposed scope suggests that registered DPs and TPs have comprehensive access to the amount of existing and forecasted DER. The Industry Need section further suggests that *"The TP should have the ability to act as an intermediary to provide data from DPs to the PC."* We believe this proposal, along with others being pursued under the umbrella of DER / Inverter Based Resource concerns, adds responsibilities to Distribution Providers beyond what was envisioned in the current NERC Rules of Procedure's Compliance Registry Criteria (Appendix 5B). Would FERC's authority to approve and enforce reliability standards applicable to "users, owners and operators of the bulk-power system" under the Energy Policy Act of 2005 be stretched/exceeded if the standard modification suggested in the SAR is pursued? We are concerned that Distribution Provider's will be assigned this task simply because there is no reasonable alternative in the current compliance registry landscape. LSEs are no longer registered and GO-IBR / GOP-IBR registration hasn't begun. The DP, while aware of the presence of the resource, may not have the data or be able to acquire the data; the DP shouldn't be held accountable for providing such data that it does not own.

While we agree the collection of DER data suggested in the SAR would be beneficial to multiple entities that perform long-term planning (RP, TP, PC) and operational planning activities (BA, TOP, RC), we don't believe the SAR captures the usefulness of the information to all those entities (it primarily focuses on the PC's use). The standard could also be split to segregate the needs of long-term planning and operational planning needs (resulting in two standards).

The SPIDERWG Whitepaper considers potential thresholds for DER aggregation for IRO-001 (page 14, footnote 14). It's recommended that a similar approach be considered for MOD-031 related to DER so entities are not overly burdened for data requests when aggregated DER is insignificant to operations. We agree that due to the changing generation landscape, the PC should be aware of DER and it's potential impacts, however, reporting burden should be very light until such time that thresholds are met where BES operations could potentially be impacted (as defined by the PC or TP).

Likes 0

Dislikes 0

### Response

#### Diana Aguas - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

No

Document Name

Comment

CenterPoint Energy Houston Electric, LLC (CEHE) supports the comments as submitted by the Edison Electric Institute (EEI). CEHE is concerned with requiring Distribution Providers (DP) to provide forecasted load data if DPs have no authority over the facility owners (i.e. solar, battery energy storage systems, etc.) to require this data.

Likes 0

Dislikes 0

### Response

**Teresa Krabe - Lower Colorado River Authority - 1,5**

**Answer** No

**Document Name**

**Comment**

LCRA understands the need to obtain DER data to improve the outcomes of reliability studies and assessments, however LCRA is concerned about the type of data described in the SAR and the ability of TPs to obtain that data, in particular with unregistered Distribution Providers.

LCRA has minimal visibility into the distribution system and has concern with the challenge of obtaining and/or providing “forecasted” gross demand, DER information, and DER capacity to the PC.

LCRA also doesn’t see the reliability improvement of having the Transmission Planner act as an intermediary between the PC and DP. PC’s can ask for that information directly from the DPs. This requirement would create an increased compliance burden on TPs with limited reliability improvement.

Lastly, LCRA requests that NERC Project 2023-08 (Modifications to MOD-031) work is deferred until work on NERC Project 2022-02 (Modification to MOD-032) is complete. This would allow more clarity on what DER information will be needed to perform steady state and dynamic studies.

Likes 0

Dislikes 0

**Response**

**Nikki Carson-Marquis - Minnkota Power Cooperative Inc. - 1 - MRO**

**Answer** No

**Document Name**

**Comment**

Minnkota Power supports the MRO New Standards Review Forum's (NSRF) comments.

Likes 0

Dislikes 0

**Response**

**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5**

**Answer** No

**Document Name**

**Comment**

NV Energy appreciates the opportunity to comment and offers the following recommendations.

**Clarify the data that must be provided:** NV Energy believes it would be helpful for the SDT to provide a technical reference document describing the data being sought under MOD-031. For example, the word “capacity” as used in the 2nd paragraph on page 4:

*Project 2022-02 covers the steady-state and dynamics data requirements pertaining to DERs, while this SAR is proposing a project to cover current and forecasted **capacity** projections for DERs.*

Is “capacity” intended to mean nameplate capacity or something else? How does this “capacity” differ from that being collected pursuant to MOD-032? NV Energy requests this be clarified. It is difficult to agree with the proposed scope not knowing what data is being sought.

**Clarify which entities provide the data:** For Planning Coordinators and Transmission Planners to have comprehensive and accurate models reflecting accurate and up-to-date information, the entities that own or have access to the data must be required to provide it as described under the “Project Scope” on page 2 of the SAR. There, the SAR “requires DPs and TPs to provide existing and forecasted DER data when the PC determines the need.” NV Energy supports this provision as, in many cases, the PC will not have direct access to or ownership of DER data whereas, in most cases, the TP and/or DP will.

NV Energy requests the SAR be clear and consistent on this point throughout the SAR. To that end, NV Energy requests the below sections of the SAR be revised to align with the Project Scope on page 2:

Industry Need (page 1):

*MOD-031-3 should be revised to require DPs and TPs to provide allow for the PC to obtain existing and forecasted DER information to the PC when the PC determines the need from DPs or TPs. The TP should have the ability to act as an intermediary. Therefore, DPs should also be required to provide data from DPs to the TP PC upon request.*

Purpose or Goal (page 2):

*The purpose of this SAR is to revise and modify MOD-031-3 in the “Requirements and Measurements” section so that DPs and TPs are required to provide PC are allowed to obtain existing and forecasted DER information to the PC when the PC determines the need from DPs or TPs.*

Detailed Description (page 2):

*TPs should be an intermediary to provide this data from DPs to the PC as the DER from the DP affects the existing and forecasted demand amount of the TP’s planning area as well as the TP’s projected DER capacity for their planning area. To make this possible, DPs will be required to provide DER information to the TP upon request.*

Likes 0

Dislikes 0

**Response**

**David Jendras Sr - Ameren - Ameren Services - 1,3,6**

**Answer** No

**Document Name**

**Comment**

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

**Response**

**Bobbi Welch - Midcontinent ISO, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee Project 2023-08 Modifications to MOD-031 SAR**

**Answer** No

**Document Name** [2023-08\\_Unofficial\\_Comment\\_Form\\_SRC\\_11-08-23\\_FINAL.docx](#)

**Comment**

The **ISO/RTO Council (IRC) Standards Review Committee (SRC)**<sup>[1]</sup> believes it would be helpful if the SAR were accompanied by a technical justification or referenced a technical document that described in more detail the DER data that would be included, and how the data would be managed once collected, under the proposed revisions to MOD-031. The SRC supports improving the ability of PCs to collect Demand, energy, and related data but recognizes that entities have implemented data collection processes that have proven to be effective and efficient, and the SRC wants to ensure that existing successful data collection processes will not need to be discarded as a result of the revisions contemplated by this SAR. We therefore ask that the scope of this project include the ability to address the management of DER-related data. It is difficult for the SRC to take a position on whether the SAR scope references the appropriate functional entities without a thorough understanding of the data the SAR is intended to address. There seems to be an industry assumption that the TP and DP are the appropriate entities to provide DER data. However, due to corporate and market configurations, TPs and DPs may not necessarily possess comprehensive DER data.

The SRC also requests clarification of the word “capacity” as used in paragraph 2 on page 4 of the SAR:

*Project 2022-02 covers the steady-state and dynamics data requirements pertaining to DERs, while this SAR is proposing a project to cover current and forecasted capacity projections for DERs.*

Specifically, it is unclear whether this is intended to refer to nameplate capacity or a different metric. It is also unclear how this differs from the data being collected pursuant to MOD-032. The SRC requests that both of these ambiguities be clarified.

Additionally, the SRC notes that the Project Scope on page 2 of the SAR indicates that the resulting Reliability Standard is intended to require the TP and DP to provide DER data to the PC “when the PC determines the need.” The SRC supports this provision as, in many cases, the PC will not have direct access to or ownership of DER data whereas, in a majority of cases, the TP and/or DP will.

The SRC also notes that the proposed Industry Need section on page 1 of the SAR states “The TP should have the ability to act as an intermediary to provide data from DPs to the PC.” This is understandable for those entities that are not registered as both the TP and PC, but is not a good fit for entities that are registered as both the TP and the PC. Adding the TO to this statement would solve this concern. In addition, the last two sentences of the Industry Need section should be revised to align with the Project Scope, resulting in the following language: “. . . MOD-031-3 should be revised to require DPs, TPs, and TOs to provide existing and forecasted DER information to the PC when the PC determines the information is needed. The TP or

TO should have the ability to act as an intermediary to provide data from DPs to the PC. Therefore, DPs should also be required to provide data to the TP and TO upon request.”

Additionally, the SRC believes that the project scope should be revised to consider the impacts of DER participation in various programs, particularly aggregation programs, on data reporting, especially the risk of double reporting or an absence of reporting based on how impacted entities manage DER aggregation and FERC Order No. 2222 implementation. The SRC also requests that the following sections of the SAR be revised to align with the Project Scope on page 2:

Purpose or Goal (page 2):

*The purpose of this SAR is to revise and modify MOD-031-3 in the “Requirements and Measures” section so that DPs, TOs, and TPs are required to provide PC are allowed to obtain existing and forecasted DER information to the PC when the PC determines the information is needed. from DPs or TPs*

Detailed Description (page 2):

*TPs and TOs should be an intermediary to provide this data from DPs to the PC as the DER from the DP and TO affects the existing and forecasted demand amount of the TP’s planning area as well as the TP’s projected DER capacity for their planning area. Therefore, DPs and TOs should be required to provide data to the TP upon request.*

The SRC requests this SAR be revised to clearly state that all entities that possess the necessary DER-related data or have responsibilities related to the necessary DER-related data should be subject to the revised MOD-031 requirements that result from this SAR. It is inappropriate to require transmission modeling entities to produce and maintain comprehensive models reflecting accurate and up-to-date information if the entities who have the data necessary to produce those models are not subject to requirements to provide that data to the relevant transmission modeling entities or are not subject to NERC jurisdiction at all. The SRC has encountered this issue in other NERC Reliability Standards and believes that this SAR should be revised to ensure this problem does not arise in this project.

[\[1\]](#) For purposes of these comments, the IRC SRC includes the following entities: CAISO, ERCOT, IESO, ISO-NE, MISO, NYISO, PJM and SPP.

Likes 0

Dislikes 0

### Response

**Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2**

**Answer**

No

**Document Name**

**Comment**

ERCOT joins the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and adopts them as its own.

Likes 0

Dislikes 0

<b>Response</b>	
<b>Stephen Stafford - Georgia Transmission Corporation - 1 - SERC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>GTC twice previously submitted the following comment on the SAR during RSTC reviews:</p> <p>“The SAR should recognize that there are currently no regulatory obligations for DER resource owners to provide certain data and the SDT should consider provisions for this when developing the requirements.”</p> <p>This comment was not addressed in the SAR revision, and it is a very important issue. The SAR proposed to make the TP an intermediary to the DP, who is obligated to report information from the DER owner, who has no obligation to provide the information. Therefore, the DP and the TP can potentially suffer a non-compliance issue if the DER owner does not provide information.</p> <p>The SAR should express that the revisions to the standard allow for but does not mandate the TP to be an intermediary to the DP.</p> <p>Furthermore, the SAR should provide some direction to address the issue of the DER owner not being obligated to provide certain requested data to the DP.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>While Southern Indiana Gas &amp; Electric Co. (SIGE) agrees obtaining existing and forecasted DER data is critical to understanding the actual system load, SIGE does not support the current SAR, in its entirety, as written.</p> <p>SIGE believes more clarity is needed in the SAR and agrees with EEI's proposed changes to the Detailed Description Section of the SAR.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Andy Thomas - DTE Energy - 1,3,5,6 - SERC,RF</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>Duke Energy agrees with Project 2023-08 - Modifications of MOD-031 Demand and Energy Data SAR Scope as written contingent upon Section 215 not being violated relative to “facilities used in the local distribution of electric energy” are not included in the Bulk Power System definition and hence not under NERC authority as defined by EEI. States and other regulatory bodies and processes must be respected.</p> <p>Include a provision in the SAR Scope to allow for reasonable assumptions where DER data does not readily exist (e.g., rooftop solar). Include specific minimum rated kW output in the SAR Scope that discusses the applicability of this topic.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p><b>Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company</b></p>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>The SDT should give consideration to paragraph 105 of FERC Order No. 901 which states that if distribution providers are unable to gather adequate IBR-DERs data in the aggregate or unable to gather IBR-DERs data in the aggregate at all, provide instead to the Bulk-Power System planners and operators in their areas: (1) an estimate of the modeling data and parameters of IBR-DERs in the aggregate, (2) an explanation of the limitations of the availability of data, (3) an explanation of the limitations of the data provided by IBR-DERs, and (4) the method used for estimation.</p>	
Likes 1	ReliabilityFirst , 10, Whaite Stephen
Dislikes 0	
<b>Response</b>	
<p><b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b></p>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>EEI does not support the current SAR as written. The Industry Needs section states that MOD-031 needs to be updated to provide authority “to collect Demand, energy and related data to support reliability studies and assessments”, yet requirement R1 already provides the PC and BA the authority to collect Total, Internal Demand, Net Energy for Load and Demand Side Management data from TPs, BAs and DPs. What is unclear is what is included in the “related data.” The intent and extent of this related data needs to be clarified before this SAR moves forward. While EEI agrees that DPs need to provide data on aggregate amounts of DER resources that impact Demand at points of interconnection (POIs), however, EEI does not agree with</p>	

gathering specific data on DER resources (except those bidding into the organized markets) To address this issue, the SAR should be modified to limit these data requests to aggregate DERs impacts at the POIs and not include detailed data on DERs used in local distribution.

**Detailed Description Concerns:**

The proposed SAR as written includes DP obligations that exceed NERC authority. DERs used for supporting local distribution and are not intended to support the BPS and fall outside of NERC authority. However, EEI recognized that there is a need to provide details on the impacts of aggregated DER impacts on Demand at the Point of Interconnection. For this reason, we agree that DPs should provide details on localized impacts on Demand due to DERs on their system. However, the level of detail included in this SAR is inappropriate, exceeding what is allowed by Section 215 and potentially places distribution planning outside of State regulation. To address these concerns, we offer the following suggested changes to the Detailed Description Section of the SAR below in boldface:

**MOD-031 revisions should be limited to specific language that would obligate DPs to provide DERs data that identifies aggregated impacts on load Demand at Points of Interconnection (POI). TPs should be provided limited authority to act as an intermediary, if needed, to assist in helping the DP provide this data to the PC. In order to address PC concerns regarding entity's forecast consistency with other interconnected DPs, the standard should make it clear that DPs and PCs should work together to ensure to ensure aggregated DER data meets the PC's need to obtain existing and forecasted gross demand is met. The details of this process should not be specifically detailed in MOD-031-3 language but left to the responsible entities to address based on existing regional and responsible entity processes.**

Likes 0

Dislikes 0

**Response**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Chantal Mazza - Hydro-Quebec (HQ) - 1 - NPCC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0



**Response**

**Stephen Whaite - ReliabilityFirst - 10 - RF, Group Name** ReliabilityFirst Ballot Body Member and Proxies

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Israel Perez - Salt River Project - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Junji Yamaguchi - Hydro-Quebec (HQ) - 1,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name** SPP RTO

**Answer** Yes

**Document Name**

<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Jennie Wike - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6 - WECC, Group Name Tacoma Power</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

**2. Provide any additional comments for the drafting team to consider, if desired.**

**Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2**

**Answer**

**Document Name**

**Comment**

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

**Response**

**Bobbi Welch - Midcontinent ISO, Inc. - 2, Group Name ISO/RTO Council Standards Review Committee Project 2023-08 Modifications to MOD-031 SAR**

**Answer**

**Document Name**

**Comment**

It may be necessary for NERC or the SDT to review whether the NERC definition of a “Distribution Provider” is broad enough to include the entities that possess the DER data required to accomplish the objectives of this SAR. Appendix 5B of the NERC ROP currently defines DP as follows:

*Provides and operates the “wires” between the transmission system and the end-use customer. For those end-use customers who are served at transmission voltages, the Transmission Owner also serves as the Distribution Provider. Thus, the Distribution Provider is not defined by a specific voltage, but rather as performing the distribution function at any voltage.*

However, DER aggregators who may not be NERC-registered DPs operate in some planning regions. Relying on the NERC DP definition for purposes of this SAR would seem to include an assumption that the DP will have the authority to compel these entities to provide the necessary DER-related data. Existing DP registration requirements may be adequate to capture DERs; however, this will require analysis to ensure that a sufficient percentage of all DPs have this authority.

In addition, the SRC requests that work on this project be deferred until the work on MOD-032 in Project 2022-02 is complete. This approach will retain the MOD-031 project in queue, while taking a logical and sequential approach to DER standards development and allowing industry to implement the DER modeling efforts envisioned under MOD-032 as a first and necessary step prior to compounding that effort by implementing the provisions this SAR would add to MOD-031.

Finally, when Load Serving Entity (LSE) was removed from the list of functional registration categories, there was no direct resolution of the question of whether the DP was intended to assume the LSE responsibilities. Specifically, the LSE’s role was to:

*Secure energy and transmission service (and related Interconnected Operations Services) to serve the electrical demand and energy requirements of its end-use customers.*

NERC and the SDT should strongly consider whether these former LSE responsibilities need to be added to the DP's responsibilities in order to facilitate the collection of DER information. The SRC notes that the DP definition is currently silent on questions of demand and energy, which are fundamental questions when addressing DERs.

Another consideration to ensure all needed DER are captured is related to the NERC de-registration of low impact DPs from the compliance registry. Those loads were "subsumed" under the responsibility of the parent Transmission Owner/Transmission Provider. A gap may exist if that TO/TP must attempt to obtain DER data from a "sub-transmission" provider, such as the owner of a 69KV system that is not a NERC-registered TO/TP.

Likes 0

Dislikes 0

### Response

**David Jendras Sr - Ameren - Ameren Services - 1,3,6**

**Answer**

**Document Name**

**Comment**

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

### Response

**Dwanique Spiller - Berkshire Hathaway - NV Energy - 5**

**Answer**

**Document Name**

**Comment**

**Review the adequacy of Distribution Provider registration criteria.** It may be necessary to review whether the NERC definition of a "Distribution Provider" is sufficient to capture those entities which have access or "own" the DER data required. The current Rules of Procedure, Appendix B, Section III (excluding footnotes) state:

**III.a.1** Distribution Provider system serving >75 MW of peak Load that is directly connected to the BES; or

**III.a.2** Distribution Provider is the responsible entity that owns, controls, or operates Facilities that are part of any of the following Protection Systems or programs designed, installed, and operated for the protection of the BES:

• a required Undervoltage Load Shedding (UVLS) program and/or

• a required Special Protection System or Remedial Action Scheme and/or

&bull; a required transmission Protection System; or

**III.a.3** Distribution Provider that is responsible for providing services related to Nuclear Plant Interface Requirements (NPIRs) pursuant to an executed agreement; or

**III.a.4** Distribution Provider with field switching personnel identified as performing unique tasks associated with the Transmission Operator's restoration plan that are outside of their normal tasks.

NV Energy observes that in some cases, the entity owning DER information may not be a NERC registered DP. Therefore, although the SAR contemplates that the provision of DER data from registered TPs and DPs will be adequate to ensure reliable modeling, this should be verified. As with the registration of IBRs (where the approach proposed under Docket RD22-24-000 is expected to result in approximately 98% of BPS-connected IBRs being subject to applicable NERC Reliability Standards), likewise, existing DP registration requirements may be adequate to capture DER information. That said, NV Energy recommends NERC perform an analysis to validate this assumption.

Likes 0

Dislikes 0

### Response

#### Nikki Carson-Marquis - Minnkota Power Cooperative Inc. - 1 - MRO

Answer

Document Name

Comment

Minnkota Power supports the MRO New Standards Review Forum's (NSRF) comments.

Likes 0

Dislikes 0

### Response

#### Teresa Krabe - Lower Colorado River Authority - 1,5

Answer

Document Name

Comment

None at this time.

Likes 0

Dislikes 0

<b>Response</b>	
<b>Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
NPCC RSC supports the project.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>In general, we believe the existing MOD-031-3 language is far too prescriptive in the data and time frames in which data is allowed to be requested. The SAR drafting team should consider SAR language allowing more general descriptions of the data being requested to give the TP or PC more flexibility in what data, time frames, and formats they can use in making requests.</p> <p>The direction/advancement of this SAR should also take the recently issued FERC Order 901 (Reliability Standards to Address Inverter-Based Resources) into consideration.</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
N/A	
Likes 0	

Dislikes 0

**Response**

**Alan Kloster - Evergy - 1,3,5,6 - MRO**

**Answer**

**Document Name**

**Comment**

Evergy supports and incorporates by reference the comments of the MRO NSRF for question #2.

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP RTO**

**Answer**

**Document Name**

**Comment**

SPP has a concern about the appropriate Distributed Energy Resource (DER) data that needs to be collected for MOD-031 and its equivalency to DER data collection for the MOD-032 Standard.

In our assessment of the SAR, we noticed that the language in the description section of SAR suggests that there is a different applicability for a **maximum active power value** for the **entity’s footprint**, but this **does not equate** to the **equipment active power settings**.

At this point, we recommend that this drafting team coordinates with the Project 2022-02 drafting team to ensure appropriate DER data is identified as well as listed to meet the needs of the two standards from an efficient and reliability prospective.

Furthermore, we recommend that the drafting team remove the Guidelines and Technical Basis (GTB) from the standard and create an independent document for that language.

Finally, we recommend that drafting team align the rationale document with any changes made to the standard.

Likes 0

Dislikes 0

**Response**

**Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group**

**Answer**

**Document Name**

**Comment**

**Review the adequacy of Distribution Provider registration criteria.** It may be necessary to review whether the NERC definition of a “Distribution Provider” is sufficient to capture those entities which have access or “own” the DER data required. The current Rules of Procedure, Appendix B, Section III (excluding footnotes) state:

**III.a.1** Distribution Provider system serving >75 MW of peak Load that is directly connected to the BES; or

**III.a.2** Distribution Provider is the responsible entity that owns, controls, or operates Facilities that are part of any of the following Protection Systems or programs designed, installed, and operated for the protection of the BES:

&bull; a required Undervoltage Load Shedding (UVLS) program and/or

&bull; a required Special Protection System or Remedial Action Scheme and/or

&bull; a required transmission Protection System; or

**III.a.3** Distribution Provider that is responsible for providing services related to Nuclear Plant Interface Requirements (NPIRs) pursuant to an executed agreement; or

**III.a.4** Distribution Provider with field switching personnel identified as performing unique tasks associated with the Transmission Operator’s restoration plan that are outside of their normal tasks.

The MRO NSRF observes that in some cases, the entity owning DER information may not be a NERC registered DP. Therefore, although the SAR contemplates that the provision of DER data from registered TPs and DPs will be adequate to ensure reliable modeling, this should be verified. As with the registration of IBRs (where the approach proposed under Docket RD22-24-000 is expected to result in approximately 98% of BPS-connected IBRs being subject to applicable NERC Reliability Standards), likewise, existing DP registration requirements may be adequate to capture DER information. That said, the MRO NSRF recommends NERC perform an analysis to validate this assumption.

The MRO NSRF recommends that SAR’s scope include developing a floor apparent power/ Real Power magnitude for unregistered DER that would establish a brightline criteria.

**Defer work on MOD-031 until work on MOD-032 is complete.** Finally, the MRO NSRF requests that work on this project not be initiated until work on MOD-032 (pursuant to Project 2022-02) is complete. This approach will retain the MOD-031 project in queue, while taking a logical and sequential approach to developing DER standards. This approach would also allow industry time to consider and think through the DER modeling aspects envisioned under MOD-032 as a first and necessary step prior to compounding that effort with the provisions envisioned under MOD-031.



Dislikes 0

**Response**

**Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name** Southern Company

**Answer**

**Document Name**

**Comment**

No additional comments.

Likes 0

Dislikes 0

**Response**

**Stephen Whaite - ReliabilityFirst - 10 - RF, Group Name** ReliabilityFirst Ballot Body Member and Proxies

**Answer**

**Document Name**

**Comment**

RF recommends NERC staff, the Standards Committee, and any assigned SAR Drafting Team reevaluate the proposed project scope in light of the directives in FERC Order 901, issued October 19th, 2023.

Likes 0

Dislikes 0

**Response**

**Michael Foley - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6**

**Answer**

**Document Name**

**Comment**

MOD-031 is a document that is already overburdened with legal language and could use simplification and more clarity. Portions of the document are difficult to interpret and are circular. It is recommended that this SAR simplify MOD-031.

Likes 0

Dislikes 0

**Response**

**Andy Thomas - DTE Energy - 1,3,5,6 - SERC,RF**

**Answer**

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**Daniela Atanasovski - APS - Arizona Public Service Co. - 1,3,5,6**

**Answer**

**Document Name**

**Comment**

Because DP's do not always have access to DER modeling data, AZPS recommends that DP's should be required to provide the assumptions that they use or actual data when available.

Likes 0

Dislikes 0

**Response**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10**

**Answer**

**Document Name**

**Comment**

Texas RE encourages the drafting team to ensure the language clearly delineates the responsibilities between the DP and the TP.

Likes 0

Dislikes 0

**Response**

**Ben Hammer - Western Area Power Administration - 1,6**

**Answer**

**Document Name**

**Comment**

None beyond that stated above.

Likes 0

Dislikes 0

**Response**

**LaTroy Brumfield - American Transmission Company, LLC - 1**

**Answer**

**Document Name**

**Comment**

ATC requests that NERC Project 2023-08 (Modifications to MOD-031) work is deferred until work on NERC Project 2022-02 (Modification to MOD-032) is complete. This approach will retain the MOD-031 project in queue, while taking a logical and sequential approach to developing DER definition and inclusion into standards. This approach would also allow industry time to consider and think through the DER modeling aspects envisioned under MOD-032 as a first and necessary step prior to compounding that effort with the provisions envisioned under MOD-031.

ATC is registered as a Transmission Planner, Transmission Owner, and Transmission Operator with both the MRO and RF for the ATC transmission system.

ATC does not have controllable and dispatchable Demand Side Management under the control or supervision of the Transmission Operator. ATC is not directly responsible for serving wholesale and retail load. ATC does not have any Interruptible loads or loads under Direct Control Load Management and does not plan to have any within the planning horizon. ATC does not have direct knowledge of the DER on the DP system. Nor can ATC be able to vet any information obtained as "accurate" data.

ATC would also like to suggest that the DP entity may not be the correct functional entity to collect DER data as they are not always the ones who initiate these resources and sometimes may not know of some DER data. A new DER Owner/Aggregator functional entity could be created to require the entities who own larger DER resources (i.e., perhaps over 1 MVA) or who aggregate the DER resources to report the data to the DP, TP, and PC. This would eliminate any extra confusion on who the source of data really is. Wor

Likes 0

Dislikes 0

**Response**

### Question 1

1. Do you agree with the proposed scope as described in the Project 2023-08 SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation and explanation.

Yes

No

**Comments:** The ISO/RTO Council (IRC) Standards Review Committee (SRC) believes it would be helpful if the SAR were accompanied by a technical justification or referenced a technical document that described in more detail the DER data that would be included, and how the data would be managed once collected, under the proposed revisions to MOD-031. The SRC supports improving the ability of PCs to collect Demand, energy, and related data but recognizes that entities have implemented data collection processes that have proven to be effective and efficient, and the SRC wants to ensure that existing successful data collection processes will not need to be discarded as a result of the revisions contemplated by this SAR. We therefore ask that the scope of this project include the ability to address the management of DER-related data. It is difficult for the SRC to take a position on whether the SAR scope references the appropriate functional entities without a thorough understanding of the data the SAR is intended to address. There seems to be an industry assumption that the TP and DP are the appropriate entities to provide DER data. However, due to corporate and market configurations, TPs and DPs may not necessarily possess comprehensive DER data.

The SRC also requests clarification of the word “capacity” as used in paragraph 2 on page 4 of the SAR:

*Project 2022-02 covers the steady-state and dynamics data requirements pertaining to DERs, while this SAR is proposing a project to cover current and forecasted capacity projections for DERs.*

Specifically, it is unclear whether this is intended to refer to nameplate capacity or a different metric. It is also unclear how this differs from the data being collected pursuant to MOD-032. The SRC requests that both of these ambiguities be clarified.

Additionally, the SRC notes that the Project Scope on page 2 of the SAR indicates that the resulting Reliability Standard is intended to require the TP and DP to provide DER data to the PC “when the PC determines the need.” The SRC supports this provision as, in many cases, the PC will not have direct access to or ownership of DER data whereas, in a majority of cases, the TP and/or DP will.

The SRC also notes that the proposed Industry Need section on page 1 of the SAR states “The TP should have the ability to act as an intermediary to provide data from DPs to the PC.” This is understandable for those entities that are not registered as both the TP and PC, but is not a good fit for entities that are registered as both the TP and the PC. Adding the TO to this statement would solve this concern. In addition, the last two sentences of the Industry Need section should be revised to align with the Project Scope, resulting in the following language: “. . . MOD-031-3 should be revised to require DPs, TPs, and TOs to provide existing and forecasted DER information to the PC when the PC determines the information is needed. The TP or TO should have the ability to act as an intermediary to provide data from DPs to the PC. Therefore, DPs should also be required to provide data to the TP and TO upon request.”

Additionally, the SRC believes that the project scope should be revised to consider the impacts of DER participation in various programs, particularly aggregation programs, on data reporting, especially the risk of double reporting or an absence of reporting based on how impacted entities manage DER aggregation and FERC Order No. 2222 implementation. The SRC also requests that the following sections of the SAR be revised to align with the Project Scope on page 2:

Purpose or Goal (page 2): The purpose of this SAR is to revise and modify MOD-031-3 in the “Requirements and Measures” section so that *DPs, TOs, and TPs are required to provide PC*~~are allowed to obtain~~ existing and forecasted DER information to the PC when the PC determines the information is needed. ~~from DPs or TPs~~

Detailed Description (page 2): TPs and TOs should be an intermediary to provide this data from DPs to the PC as the DER from the DP and

TO affects the existing and forecasted demand amount of the TP's planning area as well as the TP's projected DER capacity for their planning area. *Therefore, DPs and TOs should be required to provide data to the TP upon request.*

The SRC requests this SAR be revised to clearly state that all entities that possess the necessary DER-related data or have responsibilities related to the necessary DER-related data should be subject to the revised MOD-031 requirements that result from this SAR. It is inappropriate to require transmission modeling entities to produce and maintain comprehensive models reflecting accurate and up-to-date information if the entities who have the data necessary to produce those models are not subject to requirements to provide that data to the relevant transmission modeling entities or are not subject to NERC jurisdiction at all. The SRC has encountered this issue in other NERC Reliability Standards and believes that this SAR should be revised to ensure this problem does not arise in this project.

2. Provide any additional comments for the drafting team to consider, if desired.

**Comments:** It may be necessary for NERC or the SDT to review whether the NERC definition of a "Distribution Provider" is broad enough to include the entities that possess the DER data required to accomplish the objectives of this SAR. Appendix 5B of the NERC ROP currently defines DP as follows:

*Provides and operates the "wires" between the transmission system and the end-use customer. For those end-use customers who are served at transmission voltages, the Transmission Owner also serves as the Distribution Provider. Thus, the Distribution Provider is not defined by a specific voltage, but rather as performing the distribution function at any voltage*

However, DER aggregators who may not be NERC-registered DPs operate in some planning regions. Relying on the NERC DP definition for purposes of this SAR would seem to include an assumption that the DP will have the authority to compel these entities to provide the necessary DER-related data. Existing DP registration requirements may be adequate to capture DERs; however, this will require analysis to ensure that a sufficient percentage of all DPs have this authority.

In addition, the SRC requests that work on this project be deferred until the work on MOD-032 in Project 2022-02 is complete. This approach will retain the MOD-031 project in queue, while taking a logical and sequential approach to DER standards development and allowing industry to implement the DER modeling efforts envisioned under MOD-032 as a first and necessary step prior to compounding that effort by implementing the provisions this SAR would add to MOD-031.

Finally, when Load Serving Entity (LSE) was removed from the list of functional registration categories, there was no direct resolution of the question of whether the DP was intended to assume the LSE responsibilities. Specifically, the LSE's role was to:

*Secure[] energy and transmission service (and related Interconnected Operations Services) to serve the electrical demand and energy requirements of its end-use customers.*

NERC and the SDT should strongly consider whether these former LSE responsibilities need to be added to the DP's responsibilities in order to facilitate the collection of DER information. The SRC notes that the DP definition is currently silent on questions of demand and energy, which are fundamental questions when addressing DERs.

Another consideration to ensure all needed DER are captured is related to the NERC de-registration of low impact DPs from the compliance registry. Those loads were "subsumed" under the responsibility of the parent Transmission Owner/Transmission Provider. A gap may exist if that TO/TP must attempt to obtain DER data from a "sub-transmission" provider, such as the owner of a 69KV system that is not a NERC-registered TO/TP.

**Cain Braveheart – Bonneville Power Administration**

BPA SMEs agree with the SAR scope but have some concerns.

**Comment:**

*“BPA agrees that there is the potential need for data on DERs to support operations and grid stability. We note that many of the customers we serve, who are the applicable load serving entities to which this standard would be applied, are not equipped with data systems and expertise to provide these data. It would likely fall upon BPA to provide the data via the LaRC process, and would entail significant upfront costs (such as contracting services and metering), and ongoing resources (such as metering and load forecasting analysts) to maintain the required set of DER forecasts, should the Planning Coordinator request it.”*