

Standard Authorization Request (SAR)

Complete and submit this form, with attachment(s) to the [NERC Help Desk](#). Upon entering the Captcha, please type in your contact information, and attach the SAR to your ticket. Once submitted, you will receive a confirmation number which you can use to track your request.

The North American Electric Reliability Corporation (NERC) welcomes suggestions to improve the reliability of the bulk power system through improved Reliability Standards.

| Requested information | | | |
|--|---|--------|--|
| SAR Title: | EMT Modeling | | |
| Date Submitted: | June 8, 2022 (Revised on May 15, 2023) | | |
| SAR Requester | | | |
| Name: | Allen Schriver, NextEra Energy (NERC IRPS Chair) Julia Matevosyan, ESIG (NERC IRPS Vice Chair) | | |
| Organization: | NERC Inverter-Based Resource Performance Subcommittee (IRPS) (Revised by Project 2022-04 SAR DT) | | |
| Telephone: | Allen – 561-904-3234 Julia – 512-994-7914 | Email: | allen.schriver@fpl.com julia@esig.energy |
| SAR Type (Check as many as apply) | | | |
| <input checked="" type="checkbox"/> New Standard | <input type="checkbox"/> Imminent Action/ Confidential Issue (SPM Section 10) | | |
| <input checked="" type="checkbox"/> Revision to Existing Standard | <input type="checkbox"/> Variance development or revision | | |
| <input checked="" type="checkbox"/> Add, Modify or Retire a Glossary Term | <input type="checkbox"/> Other (Please specify) | | |
| <input type="checkbox"/> Withdraw/retire an Existing Standard | | | |
| Justification for this proposed standard development project (Check all that apply to help NERC prioritize development) | | | |
| <input type="checkbox"/> Regulatory Initiation | <input checked="" type="checkbox"/> NERC Standing Committee Identified | | |
| <input type="checkbox"/> Emerging Risk (Reliability Issues Steering Committee) Identified | <input type="checkbox"/> Enhanced Periodic Review Initiated | | |
| <input type="checkbox"/> Reliability Standard Development Plan | <input checked="" type="checkbox"/> Industry Stakeholder Identified | | |
| Industry Need (What Bulk Electric System (BES) reliability benefit does the proposed project provide?): | | | |
| <p>The bulk power system (BPS) in North America is undergoing a rapid transformation towards high penetrations of inverter-based resources (IBR). Transmission Planners (TP) and Planning Coordinators (PC) are concerned about the lack of accurate modeling data and the need to perform electromagnetic transient (EMT) studies during the interconnection and planning processes. The growth of inverter technology has pushed conventional planning tools to their limits in many ways. TPs and PCs are now faced with the need to conduct more detailed studies using EMT models for issues related to inverter-based resource integration. This SAR proposes including EMT models and studies in planning-related NERC Standards to ensure reliable operation of the BPS moving forward. See supporting paper¹ for more details.</p> | | | |

¹ [IRPS Supporting Paper](#)

| Requested information |
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| Purpose or Goal (How does this proposed project provide the reliability-related benefit described above?): |
| <p>This project addresses the reliability-related need and benefit by ensuring TPs and PCs have accurate models necessary to adequately conduct reliability studies under increasing levels of inverter-based resources. This requires the collection of EMT models by applicable entities in order to conduct EMT studies. Furthermore, this proposed project addresses reliability issues identified in the NERC disturbance reports by accomplishing the following:</p> <ul style="list-style-type: none"> • Ensuring that the TP and PC defined interconnection study process is clear on the modeling and study requirements needed to ensure reliable operation of the BPS, inclusive of EMT modeling and studies. • Ensuring that EMT models are available to TPs and PCs for the purposes of reliability studies. • Ensuring that model quality issues are addressed both during interconnection study process and post facility commissioning. • Ensuring that EMT studies are conducted per TPs and PCs defined processes during the interconnection study process and after commercial operation. • Ensuring that relevant modeling data is collected and verified. |
| Project Scope (Define the parameters of the proposed project): |
| <p>This scope of the project is to modify applicable NERC standards and/or develop new NERC standards in order to:</p> <ol style="list-style-type: none"> i. Create and incorporate EMT model and study requirements, and ii. Include EMT model quality verification² processes and functional tests³ to ensure models meet the requirements defined in item i. |
| Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to execute the project. If you propose a new or substantially revised Reliability Standard or definition, provide: (1) a technical justification ⁴ which includes a discussion of the reliability-related benefits of developing a new or revised Reliability Standard or definition, and (2) a technical foundation document (e.g., research paper) to guide development of the Standard or definition): |
| <p>Defined terms will be created as needed. It is anticipated that the following standards may be impacted: FAC-002, MOD-032, and TPL-001.</p> <p>The proposed modifications would address the following identified gaps:</p> |

² For the purposes of this SAR, the term “verification” refers to the static process of checking documents and files, and comparing them to model parameters, model structure, or equipment settings.

³ For the purposes of this SAR, the term “functional tests” refers to tests that confirm model usability, initialization, and interoperability.

⁴ The NERC Rules of Procedure require a technical justification for new or substantially revised Reliability Standards. Please attach pertinent information to this form before submittal to NERC.

Requested information

- NERC FAC-002 Enhancements or New Standard:
 - **TP and PC Create and Incorporate EMT Model and Study Requirements:** Consider requirements for TP and PC to establish EMT model and study requirements as part of the interconnection process.
 - **Ensure Accurate Models are Provided, Verified, and Validated Prior to Commercial Operation:** Consider a requirement that TP and PC shall follow a defined process to verify that the model and study requirements used in FAC-002 interconnection studies meet the TP and PC defined model requirements. Consider a requirement that Generator Owner (GO) shall provide accurate models along with sufficient evidence to support verification of requirements by the TP and PC. The benchmarking between the positive sequence and EMT models should be conducted by the GO. The final verification of the models should be conducted at the time of plant commissioning or during trial operations. The requirement should state that an updated model (if required) be provided to ensure the models used in studies match the actual plant configuration, equipment, and settings. Proof of accuracy for EMT models should be provided for the type of phenomena these models will be used to assess. The GO shall provide sufficient documentation to ensure control modes, settings, protections, and performance match between the models and the installed equipment. Discrepancies between models or validation⁵ results throughout the interconnection process may require re-studies by the TP to ensure reliable operation prior to commercial operation. The GO may be subject to any operational constraints by the Transmission Operator (TOP) and Reliability Coordinator (RC) until the facility can be operated in a planned and studied operating state.
 - **Clarify Requirements on Applicable Entities Providing Accurate Models:** Clarify existing requirements that use vague terms like “coordinate and cooperate” to more explicitly state that the applicable entities will provide accurate models meeting the TP and PC modeling requirements (including model quality specifications), and that any modifications to equipment or settings shall be communicated to the TP and PC for determination if any additional reliability studies are necessary.

- NERC MOD-032 Enhancements or New Standard:

***NOTE*:** The IRPS believes that these enhancements could be made by either modifying MOD-032 or introducing a new NERC Standard specifically focused on gathering EMT models and modeling data for the purposes of reliability studies. The IRPS generally believes that concepts of Requirement R1 and Attachment 1 are applicable for EMT modeling/studies; however, the development of interconnection-wide cases to the MOD-032 designee and annual case creation process may not be applicable for EMT studies.

⁵ For the purposes of this SAR, the term “validation” refers to the dynamic process of testing or monitoring the equipment behavior, and then using the testing or monitoring results and comparing them to the model simulated response.

Requested information

- **Explicit Inclusion of EMT Models:** Consider a requirement that explicitly states the TP and PC should define EMT modeling requirements. The TP and PC defined EMT modeling requirements should at minimum include a clearly documented process for determining when EMT models shall be required from applicable entities. The process should directly specify that all models, including EMT, represent the equipment installed in the field. Any modeling deficiencies identified by the TP and PC should be addressed by the applicable entity in a timely manner. The standard should ensure that any TP or PC conducting EMT studies are able to obtain sufficient modeling information. Any TP and PC should have the authority to secure EMT models and/or modeling data from any applicable entity within a time limit defined in the standard.
- NERC TPL-001 Enhancements or New Standard:
 - **Process for Conducting EMT Studies:** Consider a requirement that the TP and PC shall develop a process/rationale for determining when detailed studies using EMT models are required as per TP and PC requirements. TPs and PCs shall then perform EMT studies for situations that meet the rationale.
 - **Stability Criteria:** The drafting team should ensure that the criteria is appropriate and applicable for the EMT studies.

The standards revisions will apply to TPs and PCs as they conduct interconnection and planning studies. Transmission Owners need to supply EMT modeling data for the transmission network, and GOs need to provide accurate EMT models to the TP/PC for studies. FAC-002 presently applies implicitly to the developers of new facilities since the TP/PC have a study process for studying new resources prior to interconnection. The inclusion of EMT modeling requirements apply to, but not limited to; generating resources (inverter-based and synchronous), synchronous condensers, transmission-connected dynamic reactive devices (e.g., FACTS controllers), transmission elements, remedial action schemes (RAS), and any other elements necessary for reliability study purposes. Models of all elements in the areas for which an EMT study is required are needed to create an accurate network model to study possible reliability risks.

The supporting paper⁶ provides a list of reference materials and documentation that serve as a strong technical basis for these changes to the NERC Standards. Most notably, the Odessa disturbance report (2021) and CA disturbance report (2022) strongly emphasize enhancements to the NERC Standards. These specifically focus on inclusion of accurate and reliable EMT models (in addition to accurate and reliable positive sequence models) along with updates to address model quality for reliability studies.

Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):

Exact costs for this project are unknown. Near-term costs are likely to increase as industry develops

⁶ [IRPS Supporting Paper](#)

| Requested information |
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| <p>practices around development, collection, and use of EMT models for reliability studies; however, the team believes that long-term costs will likely be minor as industry is already expanding necessary skills and expertise in this area across many areas of the world. OEMs are developing real-code models, generator owners are gaining familiarity with existing EMT modeling requirements, and transmission planners are gaining experience conducting or managing EMT studies. Generation and transmission entities will likely experience up-front and ongoing costs in areas where EMT studies are becoming increasingly necessary from a grid reliability standpoint. These costs are recognized; however, the team has made a focused and concerted effort to minimize costs while achieving necessary reliability outcomes for this project. Outcomes from this project, ensuring an adequate level of reliability for the BES, significantly outweigh the incremental costs of implementation from this proposed project.</p> |
| <p>Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):</p> |
| <p>No BES facilities will be directly impacted by the proposed standard modifications. Asset owners of BES facilities (GOs, Transmission Owners) will be required to provide EMT models and/or modeling data, where applicable, and ensure quality of the models submitted to the TP and PC.</p> |
| <p>To assist the NERC Standards Committee in appointing a drafting team with the appropriate members, please indicate to which Functional Entities the proposed standard(s) should apply (e.g., Transmission Operator, Reliability Coordinator, etc. See the most recent version of the NERC Functional Model for definitions):</p> |
| <p>Transmission Owners, Transmission Planners, Planning Coordinators, Generator Owners, Distribution Provider, Resource Planner, Transmission Service Provider, equipment manufacturers, consultants conducting EMT studies, and any other EMT modeling and studies experts.</p> |
| <p>Do you know of any consensus building activities⁷ in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.</p> |
| <p>This SAR was developed by the NERC IRPS, a large group of industry experts focused specifically on ensuring reliable operation of the BPS under increasing penetrations of BPS-connected inverter-based resources. This SAR was also endorsed by the NERC RSTC.</p> |
| <p>Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so, which standard(s) or project number(s)?</p> |
| <p>Project 2020-06, Project 2022-02, Project 2023-02, Project 2021-01, EMT Task Force, IRPS, and other projects that might impact this effort.</p> |
| <p>Are there alternatives (e.g., guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives.</p> |

⁷ Consensus building activities are occasionally conducted by NERC and/or project review teams. They typically are conducted to obtain industry inputs prior to proposing any standard development project to revise or develop a standard or definition.

Requested information

NERC has published a number of disturbance reports and guidelines highlighting the need for these changes to be made to NERC Standards. NERC has also published modeling-related Alerts for inverter-based resources to raise industry awareness of ongoing modeling challenges. NERC IRPS has also published numerous guidelines, technical reports, white papers, etc. to help educate industry and recommend best practices. However, the recommendations are not sufficient to ensure accurate EMT studies are conducted for ensuring BES reliability with increasing levels of inverter-based resources.

Reliability Principles

Does this proposed standard development project support at least one of the following Reliability Principles ([Reliability Interface Principles](#))? Please check all those that apply.

| | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | 1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards. |
| <input type="checkbox"/> | 2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand. |
| <input checked="" type="checkbox"/> | 3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably. |
| <input type="checkbox"/> | 4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented. |
| <input type="checkbox"/> | 5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems. |
| <input type="checkbox"/> | 6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions. |
| <input type="checkbox"/> | 7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis. |
| <input type="checkbox"/> | 8. Bulk power systems shall be protected from malicious physical or cyber attacks. |

Market Interface Principles

Does the proposed standard development project comply with all of the following [Market Interface Principles](#)?

| | Enter (yes/no) |
|--|----------------|
| 1. A reliability standard shall not give any market participant an unfair competitive advantage. | Yes |
| 2. A reliability standard shall neither mandate nor prohibit any specific market structure. | Yes |
| 3. A reliability standard shall not preclude market solutions to achieving compliance with that standard. | Yes |
| 4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. | Yes |

Identified Existing or Potential Regional or Interconnection Variances

| Region(s)/ Interconnection | Explanation |
|-------------------------------|-------------|
| None | None |

For Use by NERC Only

SAR Status Tracking (Check off as appropriate).

| | |
|---|--|
| <input type="checkbox"/> Draft SAR reviewed by NERC Staff | <input type="checkbox"/> Final SAR endorsed by the SC |
| <input type="checkbox"/> Draft SAR presented to SC for acceptance | <input type="checkbox"/> SAR assigned a Standards Project by NERC |
| <input type="checkbox"/> DRAFT SAR approved for posting by the SC | <input type="checkbox"/> SAR denied or proposed as Guidance document |

Version History

| Version | Date | Owner | Change Tracking |
|---------|-------------------|-----------------------------|--|
| 1 | June 3, 2013 | | Revised |
| 1 | August 29, 2014 | Standards Information Staff | Updated template |
| 2 | January 18, 2017 | Standards Information Staff | Revised |
| 2 | June 28, 2017 | Standards Information Staff | Updated template |
| 3 | February 22, 2019 | Standards Information Staff | Added instructions to submit via Help Desk |
| 4 | February 25, 2020 | Standards Information Staff | Updated template footer |