

Project 2023-02 Analysis and Mitigation of BES Inverter-Based Resource Performance Issues Waiver

Action

- Approve the following waiver of provisions of the Standard Processes Manual (SPM) for Project 2023-02:
 - Initial formal comment and ballot period reduced from 45 days to as few as 25 calendar days, with ballot pools formed in the first 10 days and initial ballot and non-binding poll of Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) conducted during the last 10 days of the comment period (Sections 4.7 and 4.9)
 - Additional formal comment and ballot period (s) reduced from 45 days to as little as 15 days, with ballot conducted during the last 10 days of the comment period. (Sections 4.9 and 4.12)
 - Final ballot reduced from 10 days to 5 calendar days. (Section 4.9)

Background

The project addresses the reliability-related need by requiring analysis and mitigation of unexpected or unwarranted protection and control operations from Invert-Based Resources (IBRs). This includes any types of protections and controls that result in abnormal performance issues within the plant, including abnormal performance resulting in anomalous behavior of active power output from the facility during events. The SAR focuses on revisions to PRC-004-6 and should be applicable to all Bulk Electric System (BES) IBR generating resources, including battery storage.

At the January 25, 2023 meeting, the Standards Committee (SC) accepted the Standard Authorization Request (SAR) that was submitted by the Inverter-Based Resource Performance Subcommittee and authorized soliciting members for the Drafting Team (DT). The informal comment period and the solicitation for the drafting team members ran from February 22– March 23, 2023. The DT was appointed at the June 21, 2023 SC meeting. During the October SC meeting, the SC accepted the redlined SAR.

NERC Standard Processes Manual Section 16.0 Waiver provides as follows:

The SC may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:

- In response to a national emergency declared by the United States or Canadian governments that involves the reliability of the BES or cyber attack on the BES;
- Where necessary to meet regulatory deadlines;
- Where necessary to meet deadlines imposed by the NERC Board of Trustees or

- Where the SC determines that a modification to a proposed Reliability Standard or its requirement(s), a modification to a defined term, a modification to an interpretation, or a modification to a variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

FERC Order 901 directs the development of new or modified reliability standards, including new requirements for disturbance monitoring, data sharing, post-event performance validation, and correction of IBR performance. This set of directives from the report comprises the first of three standards projects that must be completed and filed with FERC. This first set (disturbance monitoring data sharing and post-event performance validation and correction of IBR performance) must be filed with FERC by November 4, 2024.

NERC Standards Development has identified three active projects (2020-02, 2021-04, and 2023-02) that are directly impacted by these associated FERC directives. Project 2023-02 DT leadership and NERC staff request that the SC approve a waiver for certain provisions of the SPM regarding the length of comment periods and ballots in order to meet the November 2024 development deadline for 2023-02 as established by FERC.

Summary

Project 2023-02 DT leadership and NERC staff recommend that the SC shorten the initial formal comment and ballot period from 45 days to as few as 25 days and any additional formal comment and ballot period(s) from 45 days to as few as 15 days. In addition, Project 2023-02 DT leadership and NERC staff recommend shortening the final ballot from 10 days to 5 days.