Agenda Item 8 Standards Committee December 13, 2023

Project 2020-02 Modifications to PRC-024 (Generator Ride-through) Waiver

Action

- Approve the following waiver of provisions of the Standard Processes Manual (SPM) for Project 2020-02:
 - 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 few as 15 calendar days, with ballot(s) conducted during the last 5 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 SAR ensures generators remain connected to the bulk power system (BPS) during system disturbances. Specifically, this SAR focuses on the generator protection and control systems that can result in the reduction or disconnection of generating resources during these events. The SAR also ensures that protection or controls that fail to ride through system events are analyzed, addressed with a corrective action plan (if possible), and reported to necessary entities for situational awareness. However, those items are now covered within Project 2023-02. From a risk-based perspective, the goal of the standard is to mitigate the ongoing and systemic performance issues identified across multiple Interconnections and across many disturbances analyzed by NERC and the Regions. These issues have been identified in Inverter-Based Resources (IBR) and synchronous generators, with many causes of tripping entirely unrelated to voltage and frequency protection settings as dictated by the currently effective version of PRC-024.

At the April 19, 2023 meeting, the Standards Committee (SC) accepted the most recent revised SAR submitted by the Project 2020-02 Standard Drafting Team.

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 Bulk Electric System (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 that include 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 three sets of 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 2020-02 DT leadership and NERC staff request that the SC approve a waiver for specific provisions of the SPM regarding the length of comment periods and ballots in order to meet the November 2024 development deadline for 2020-02 as established by FERC.

Summary

Project 2020-02 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 2020-02 DT leadership and NERC staff recommend that the SC shorten the final ballot from 10 days to 5 days.