

# Project 2020-02 Transmission-connected Dynamic Reactive Resources

Summary Response to SAR Comments | February 2022

## Introduction

The Standard Authorization Request (SAR) drafting team thanks all who provided comments during the informal comment period. All comments received were reviewed and the identified common themes are addressed below. Some comments have been reserved for consideration during the standard drafting phase of the project, including the financial impact question and risk.

- 1. TCDRR definition(s) and Applicability section in standards should be clear which assets or technologies are considered a TCDRR and what is applicable within each Reliability Standard.**  
The Project 2020-02 standard drafting team (SDT) will use the definition of terms, revise applicability section(s), and revise standard language to make clear what assets/technologies are considered a transmission-connected dynamic reactive resource (TCDRR), and may define specific technologies (SVC, STATCOM, FACTS, HVDC, etc.). The SAR allows the SDT to add, modify or retire Glossary terms.
- 2. The SDT should coordinate drafting a Reliability Guideline with a NERC technical committee rather than revising the standards.**  
Though there is an existing [Reliability Guideline: Reactive Power Planning](#) (December 2016) covering reactive power planning and related issues, there is currently not a Reliability Guideline drafted or being drafted that addresses the reliability risks outlined in the SAR or in SAMS white paper, *Transmission Connected Dynamic Reactive Resources – Assessment of Applicability in Reliability Standards*. The 2020-02 SDT is tasked with determining whether revisions to the standards will appropriately address the reliability risk outlined in the SAR and white paper.
- 3. The SDT should consider defining addition terms such as essential reliability services.**  
The SAR allows the creation of new Glossary terms as part of the project scope. This can include new Glossary terms for all or some of the TCDRR noted in the SAMS white-paper. Essential reliability services is currently not a defined term in the Glossary of Terms used in NERC Reliability Standards. The SDT may consider adding new terms, such as essential reliability services, if they find it necessary as part of the project.
- 4. Dynamic reactive resources located at a generation Facility should not be considered TCDRR.**  
The SAR DT agrees with this comment. When a dynamic reactive resource (e.g. FACTS device or synchronous condenser) is located at a generation Facility, the asset would be covered under the applicability of existing standards. As described in the SAR, Project 2020-02 is meant to address non-generation TCDRR under the purview of the Transmission Owner. The SDT will attempt to make this distinction clear, either in the Applicability section of revised standards or in Glossary term(s).

**5. The SDT should determine the practicality of staged testing TCDRR as part of MOD-025, MOD-026, and MOD-027 implementation before revising the standards.**

Modeling data for synchronous condensers, FACTS and HVDC equipment is provided by the Transmission Owner to Transmission Planners & Planning Coordinators as part of MOD-032. However, the models are not subsequently validated, unless being reviewed by the Transmission Planner as part of MOD-033 following a system disturbance. MOD-025/026/027 could provide a means for the Transmission Owner to validate the models using a staged test, or verify the model(s) reflect in-service equipment by an alternate means. The Project 2020-02 SDT will coordinate and advise the SDTs for Project 2020-06 (MOD-026/027) & Project 2021-01 (MOD-025 and PRC-019) on the practicality of performing staged testing. However, the decision of whether and how to revise MOD-025, MOD-026, MOD-027 to include TCDRR will reside with those respective drafting teams.

## **Resources**

- [Project 2020-02 Transmission-connected Reactive Dynamic Resources](#)
- [TCR SAR \(MOD-026, MOD-027, MOD-025, PRC-019, PRC-024\)](#)
- [Industry Comments](#)