

Q&A Session for SC and NERC Generator Ride-Through (PRC-029-1) Industry Webinar

Session number: 23024028859

September 19, 2024

1: Does the technical documentation needing to be provided for an exception in R3, R4 need to be documentation provided only by the OEM? Or could an entity provide its own technical documentation, say results from testing, that would suffice? The Standard and TR are silent on this. I understand that the Measure identifies OEM frequency curves, but Measures are not enforceable. If must be OEM documentation, what that be added to Requirement language?

This question has been answered verbally. (Jamie Calderon)

2: Given the testimony of inverter and wind turbine manufacturers that the supply chain is 3-5 years out for compliance; why was the implementation plan on not changed for new generation that will be put into service between now and the end of 2030?

This question has been answered verbally. (Jamie Calderon)

3: Are there any exemptions for out of business OEMs or can they be considered hardware-based limitations?

This question has been answered verbally. (Jamie Calderon)

4: What would an entity do if an OEM is out of business and cannot provide limitation documentation?

This question has been answered verbally. (Jamie Calderon)

5: I think on slide 11 or 12 or somewhere in that area, the bulleted section had the "or" struck through at the last part of each bullet sentence so it seems like it must meet most all bullets. I think the last bullet did not have the "or" struck through. Is this correct?

This question has been answered verbally. (Jamie Calderon)

6: It was brought up a couple of times during the tech conference that in addition to hardware limitation, there is also corresponding software limitation/challenges that need to be considered. Can you provide rationale for not including software exemptions?

This question has been answered verbally. (Jamie Calderon)

7: Has the drafting team considered the difficulties OEMs may encounter when trying to identify specific pieces of equipment that may cause a hardware limitation? An OEM may not be able to identify the

specific piece of equipment, especially on older equipment that may be discontinued. R4.1.3. is largely out of the hands of the GO.

This question has been answered verbally. (Jamie Calderon)

8: The proprietary information (R4.2) addition is quite broad. It may put the RC, TOP, etc. in an impossible position of ensuring reliability if critical information is withheld under proprietary claims.

This question has been answered verbally. (Jamie Calderon)

9: Will Regional Entities be given authority to allow exemptions on Software limitations and OEM being out of business if appropriate evidence is provided?

This question has been answered verbally. (Jamie Calderon)

10: Will the Standards Committee consider Ballot 4 filed comments in its final ballot recommendations to the October NERC BOT?

This question has been answered verbally. (Jamie Calderon)

11: Can you clarify whether bullet 10 in Attachment 1 applies at the IBR unit-level?

This question has been answered verbally. (Jamie Calderon)

12: Why did NERC not follow feedback provided by some panelists and participants of the NERC Ride-through Technical Conference to relax requirements for legacy IBRs down to PRC-024 voltage and frequency trip settings?

This question has been answered verbally. (Jamie Calderon)

13: Can NERC define "legacy". FERC Order 901 states "existing IBR". Does this also include IBR plants that are under construction?

This question has been answered verbally. (Jamie Calderon)

14: New comments received during the current Draft 4 commenting period - could these comments be considered to shape the final draft recommendation to the NERC BOT. Could the present draft 4 ballot be modified before submission to the NERC BOT in October?

This question has been answered verbally. (Jamie Calderon)

15: Can you elaborate on the path forward following this ballot, both in the case it receives greater than 60% and in the event, it receives less than 60%?

This question has been answered verbally. (Jamie Calderon)

16: One more clarification reg. PRC-024: the way I interpreted the comments at the conference was that many of the "new" IBRs can meet the proposed PRC-029 if aligned with IEEE 2800-2022. But for "legacy"

IBRs, one panelist's data suggested that only if requirements were relaxed to PRC-024 an assessment of thousands of existing IBRs could be avoided. Is it NERC's intention to have capability limitations be documented for almost all "legacy" IBRs within the time frame of the Implementation Plan?

This question has been answered verbally. (Jamie Calderon)

17: Can you define "in service" in relation to NERC defined COD and GIA signature date?

This question has been answered verbally. (Jamie Calderon)

18: Hi Jamie, can you help us understand why the exemption eligibility date threshold is the in-service date in lieu of something else, like GIA execution date? We're concerned about potential hardware limitations of equipment already procured for late-stage projects that would go in-service soon after the standard's effective date, and I'm struggling to understand why those projects would be ineligible for exemption.

This question has been answered verbally. (Jamie Calderon)

19: Will there be a separate vote for the implementation plan?

This question has been answered verbally. (Jamie Calderon)

20: Will the Draft 4 ballot results be publicly published before the Oct NERC BOT meeting?

This question has been answered verbally. (Jamie Calderon)

21: Can errata changes be posted to the NERC project page?

This question has been answered verbally. (Jamie Calderon)