

# Consideration of Comments

## Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)

### Comments Received Summary

There were 29 sets of responses, including comments from approximately 104 different people from approximately 77 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, contact Manager of Standards Information, [Nasheema Santos](#) (via email) or at (404) 290-6796.

### Consideration of Comments

The Project 2024-01 Drafting Team (DT) would like to thank all of industry for their time and comments. Due to the similar nature of multiple comments received during the comment period, the DT has chosen to respond to comments in summary format as provided for by section 4.2 of the Standard Processes Manual.

### New Defined Terms

**The DT received multiple comments specific to the industry need to define multiple terms to adequately identify various Distributed Energy Resources (DER).**

Comments specific to Generator Owner and Generator Operator definitions have been addressed by the work completed by the Project 2024-01 DT by revising the Generator Owner and Generator Operator defined terms per the scope of the Generator Owner and Generator Operator Definition Alignment SAR.

The DT recommends the NERC Standards Committee reject the IBR Registration and Standards Applicability Glossary Update SAR, given the duplicative nature of the work already under consideration in Project 2022-02 Uniform Modeling Framework for IBR and Project 2020-06 Verifications of Models and Data for Generators DTs to address additional defined terms for DERs.

The IBR Registration and Standards Applicability Glossary Update SAR proposed the development or expansion of definitions as outlined below:

- **Sub-BES IBR Definition:** Develop a clear definition for Sub-BES IBRs (non-BES IBRs that meet registry criteria thresholds), ensuring there's certainty around which IBR facilities qualify. This could involve updates to the Glossary, Reliability Standards, or NERC's Rules of Procedure.

- **GO/GOP Definitions:** Revise the Glossary definitions for Generator Owners (GOs) and Generator Operators (GOPs) to include Sub-BES IBRs, ensuring no unintended expansion of standards applicability. A detailed implementation plan will be proposed to address any impact on existing standards.
- **Non-Material IBR and IBR-DER Definitions:** Develop definitions for Non-Material IBRs (BPS-connected IBRs not meeting the criteria) and IBR-DERs (distribution-connected IBRs), clarifying their applicability in standards. The goal is to ensure clarity on the classification of each type of IBR.

The proposed term Sub-BES IBR, the DT believes, is addressed with the terminology used in the revised GO and GOP definitions, specifically the Category 2 GO and Category 2 GOP. These definitions clarify that IBRs that meet the Category 2 registration criteria are what the SAR proposed to be defined by the Sub-BES IBR definition. In addition, Projects 2020-06 and 2022-02 are both looking to define DER resources for the purpose of NERC Standards. For these reasons, the 2024-01 DT believes the desired outcome of the IBR Registration and Standards Applicability Glossary Update SAR is already being completed by these other DTs and any efforts by this team would be duplicative of those teams.

The proposed Sub-BES IBR definition for Category 2 IBRs was not created by the DTs associated with Milestone 2 projects of order 901 standards due to the Applicability section of the PRC-028-1, PRC-029-1, and PRC-030-1 standards to specify what generation are applicable to the standards requirements. This approach to identifying the applicable generation for each standard is clear, consistent, and enforceable.

The development of any new or revised standards that will address *aggregated non-registered IBR* by the GO, the *aggregated IBR-DER* by the TO, are associated with Milestone 3 of 901 and are within the scope of project 2022-02 Uniform Modeling Framework for IBR DT. A definition of DER is currently being proposed in Project 2022-02 consistent with section 5.0 of the Standard Processes Manual.

Milestone 3 projects will address the scope of issues related to the current state of model quality. Industry is encouraged to engage with these active DTs to ensure the approach taken regarding identification of these generation types is clear, consistent, and enforceable.

- [Project 2020-06 Verifications of Models and Data for Generators](#)
- [Project 2021-01 – System Model Validation with IBRs](#)
- [Project 2022-02 – Uniform Framework Model Framework for IBR](#)