

## Consideration of Comments

**Project Name:** 2024-01 Rules of Procedure Definitions Alignment (GO and GOP) | Standard Authorization Request

**Comment Period Start Date:** 7/2/2024

**Comment Period End Date:** 8/20/2024

**Associated Ballot(s):**

There were 24 sets of responses, including comments from approximately 81 different people from approximately 56 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.

## Questions

1. With revisions to Generator Owner and Generator Operator definitions, as proposed in the SAR to align with the June 27 FERC approval change of the registration criteria to the NERC Rules of Procedure, is there any other information that the team should consider when making these revisions?
2. Provide any additional comments for the SAR drafting team to consider, if desired.

## The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1,3,5	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
Southwest Power Pool Regional Entity	Deborah Currie	2	MRO,WECC	IRC SRC	Charles Yeung	Southwest Power Pool	1	MRO
					Ali Miremadi	CAISO	1	WECC
					Helen Lainis	IESO	1	NPCC
					Matt Goldberg	ISO-NE	1	NPCC
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Elizabeth Davis	PJM	1	RF
Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE					
FirstEnergy - FirstEnergy Corporation	Mark Garza	1,3,4,5,6		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF

					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Black Hills Corporation	Rachel Schuldt	1,3,5,6		Black Hills Corporation - All Segments	Micah Runner	Black Hills Corporation	1	WECC
					Josh Combs	Black Hills Corporation	3	WECC
					Rachel Schuldt	Black Hills Corporation	6	WECC
					Carly Miller	Black Hills Corporation	5	WECC
					Sheila Suurmeier	Black Hills Corporation	5	WECC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC

Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC
Randy Buswell	Vermont Electric Power Company	1	NPCC
James Grant	NYISO	2	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
David Burke	Orange and Rockland	3	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
David Kwan	Ontario Power Generation	4	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
Sean Cavote	PSEG	4	NPCC
Jason Chandler	Con Edison	5	NPCC

Tracy MacNicoll	Utility Services	5	NPCC
Shivaz Chopra	New York Power Authority	6	NPCC
Vijay Puran	New York State Department of Public Service	6	NPCC
David Kiguel	Independent	7	NPCC
Joel Charlebois	AESI	7	NPCC
Joshua London	Eversource Energy	1	NPCC
Jeffrey Streifling	NB Power Corporation	1,4,10	NPCC
Joel Charlebois	AESI	7	NPCC
John Hastings	National Grid	1	NPCC
Erin Wilson	NB Power	1	NPCC
James Grant	NYISO	2	NPCC
Michael Couchesne	ISO-NE	2	NPCC
Kurtis Chong	IESO	2	NPCC
Michele Pagano	Con Edison	4	NPCC
Bendong Sun	Bruce Power	4	NPCC

					Carvers Powers	Utility Services	5	NPCC
					Wes Yeomans	NYSRC	7	NPCC
					Chantal Mazza	Hydro Quebec	1	NPCC
					Nicolas Turcotte	Hydro Quebec	2	NPCC
Western Electricity Coordinating Council	Steven Rueckert	10		WECC	Steve Rueckert	WECC	10	WECC
					Curtis Crews	WECC	10	WECC

**1. With revisions to Generator Owner and Generator Operator definitions, as proposed in the SAR to align with the June 27 FERC approval change of the registration criteria to the NERC Rules of Procedure, is there any other information that the team should consider when making these revisions?**

**Teresa Krabe - Lower Colorado River Authority - 1,5**

**Answer** No

**Document Name**

**Comment**

Nothing more at this time.

Likes 0

Dislikes 0

**Response**

Thank you for your participation.

**Israel Perez - Salt River Project - 1,3,5,6 - WECC**

**Answer** No

**Document Name**

**Comment**

None at this time.

Likes 0

Dislikes 0

**Response**

Thank you for your participation.



<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your participation.	
<b>Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your participation.	
<b>Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	

Likes	0	
Dislikes	0	
<b>Response</b>		
Thank you for your participation.		
<b>Marty Hostler - Northern California Power Agency - 3,4,5,6</b>		
Answer	Yes	
Document Name		
<b>Comment</b>		
Please refer to the SAR submitted by TAPS, APPA, and others which we feel better clarifies new IBR related definitions.		
Likes	1	Oklahoma Municipal Power Authority, 5, Tuttle Patrick
Dislikes	0	
<b>Response</b>		
Thank you for your participation and comment. The drafting team will be working to address and incorporate the mentioned SAR.		
<b>Thomas Foltz - AEP - 3,5,6</b>		
Answer	Yes	
Document Name		
<b>Comment</b>		
Once the definitions are implemented, Transmission Owners and Transmission Operators will be tasked with obtaining obligation-driven data (VAR-001 and TOP-003 for example) from entities who were not previously NERC-registered entities. Care must be taken to craft reasonable Implementation Plans, perhaps staggered as necessary, so that reasonable time is afforded to identify these entities and make arrangements to obtain the necessary data. Specifically, Transmission Owners and Operators with large footprints would be especially challenged by this, as they will have numerous, newly registered entities to identify and obtain data from.		

Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your participation and comment. The drafting team is in full agreement and will work diligently to keep this in the forefront of our thoughts throughout this process. The drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.	
<b>Kimberly Turco - Constellation - 5,6</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Constellation feels the SAR is confusing and could include a definition for sub-BES IBRs to later subject these non-BES IBRs to NERC reliability standards.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your participation and comment. Your concern has been addressed in a second SAR, in which this drafting team will also address.	
<b>Alison MacKellar - Constellation - 5,6</b>	
Answer	Yes
Document Name	
<b>Comment</b>	

Constellation feels the SAR is confusing and could include a definition for sub-BES IBRs to later subject these non-BES IBRs to NERC reliability standards.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response**

Thank you for your participation and comment. Your concern has been addressed in a second SAR (the SAR submitted by TAPS), in which this drafting team will also address.

**Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro**

**Answer** Yes

**Document Name**

**Comment**

1. The draft SAR lists the Standards identified as directly applicable following the revision of the GO and GOP Glossary of Terms definitions. While the SAR acknowledges that “other entities have responsibilities with respect to GOs/GOPs under the above-listed standards (e.g. Reliability Coordinator, Balancing Authority, Transmission Operator, Transmission Planner, Planning Coordinator, Resource Planner, Transmission Service Provider)”, it also states that “This project will impact current non-BES IBRs with aggregate nameplate capacity greater than or equal to 20 MVA connected at a voltage greater than or equal to 60kv”.

BC Hydro suggests revising to alleviate this apparent discrepancy as these Standards will impact other entities with obligations of RC, BA, etc.

2. Once the revised GO and GOP definitions that will include non-BES generating facilities are in effect, the resulting increased number of entities and/or facilities in scope will also impact other existing Standards that have entities such as RC, PC, TP, BA, TOP who will have responsibilities with respect to the new GO/GOPs added under the revised definition.

For example, COM-001-3 Requirement R1 mandates that the TOP has Interpersonal Communication capabilities with each adjacent GOP in its Transmission Operator Area. Therefore, the TOP will need to ensure it meets its compliance obligations for an expanded footprint including new GOP entities. Similarly, VAR-001-5 R5 requires the TOP to provide GOPs with voltage or Reactive Power schedules and notification requirements.

BC Hydro recommends that the SAR should include additional considerations on such indirect impacts, and provisions for an implementation plan that allows all potentially impacted entities (e.g. RC, BA, TOP, PC, TP) adequate time to accommodate increased compliance scope post registration of new entities and/or facilities.

Likes	0
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Dislikes	0
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**Response**

Thank you for your participation and recommendation. The drafting team recognizes the potential for indirect impacts as indicated in your comment and mentioned within the SAR on page 3. As part of the SAR, the drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

**Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF**

Answer	Yes
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Document Name	
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**Comment**

Duke Energy agrees with and recommends implementation of NAGF and EEI comments.

Likes	0
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Dislikes	0
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**Response**

Thank you for your participation. Please see the drafting team's response to NAGF and EEI comments.

<b>Rachel Schuldts - Black Hills Corporation - 1,3,5,6, Group Name</b> Black Hills Corporation - All Segments	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>Black Hills Corporation agrees with the comments from EEI and NAGF:</p> <p>While EEI does not oppose this SAR, we are concerned that the definitions contained in the NERC Rules of Procedure (Appendix 5B; Statement of Compliance Registry Criteria, Revision 8) do not have sufficient details to ensure consistent and unambiguous application within the NERC Reliability Standards. To address this concern, we recommend, similar to what was done with the Bulk Electric System definition, a companion Definition Reference document be developed for industry review, comment, and approval as a critical component of this project.</p> <p>EEI also recommends that in addition to the development of the implementation plans for the identified Reliability Standards identified in this SAR, the DT should consider doing a comprehensive assessment of all other NERC Reliability Standards that contain applicability for GOs and GOPs to ensure the obligations under those standards are not impacted in ways that might not be intended with the changes to these two definitions.</p> <p>The NAGF recommends that the “Other” check box be selected and specify “Implementation Plan development” in the SAR Type section to support the implementation plan to be created for the revised Generator Owner/Generator Operator (GO/GOP) definitions.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your participation. Please see the drafting team's response to EEI and NAGF comments:</p> <p>As detailed in the Enhancing NERC Standard Processes document, recommendation 2c states: “NERC Staff recommends that the Standards Committee, working with NERC Staff, provide guidance to drafting teams on how they should approach the SAR phase for a given project. Drafting teams should describe accurately the scope of the issue, the technical foundation, and, where appropriate, provide illustrative solutions that could be considered. The drafting team, however, should not attempt to limit potential outcomes through prescriptive or limiting language, which could hamper a drafting team’s ability to consider alternate approaches raised by stakeholders during comment periods.” The purpose of the SAR is to document “why” a project is needed rather than “how” project objectives will be achieved or</p>	

implemented. As such the drafting team will modify the Generator Owner and Generator Operator definitions as described in the SAR and develop an implementation plan which supports the modifications. The drafting team will take your Definition Reference Document recommendation into consideration, in which the industry may use the document as an additional tool.

As part of the SAR, the drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

As a drafting team develops a proposed Reliability Standard, they are required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. The minimum requirements are outlined in the NERC Standard Processes Manual of Appendix 3A Section 4.4.3.

**Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>FirstEnergy supports EEI comments that state:</p> <p>EEI does not support this SAR as currently drafted because it inappropriately plans to duplicate within the NERC Glossary of Terms the definitions for Generator Owner and Generator Operator as developed for use in the NERC Rules of Procedure (Appendix 5B; Statement of Compliance Registry Criteria, Revision 8), which is a document used for a different purpose from the definitions used in NERC Reliability Standards. We are also concerned that if these definitions are simply duplicated/mirrored without further clarification, those definitions would require all IBRs, regardless of size, ownership or method of control to be included in the NERC Reliability Standards, if those resources were connected at 60kV or above and aggregate to 20MVA or above on a single feeder. EEI does not agree that this was the intent of this project and therefore does not support this proposed change.</p> <p>We are also concerned that there is nothing in this SAR that would obligate the DT to conduct an analysis/assessment of the impacts of these proposed changes on the full body of NERC Reliability Standards, which is required whenever a NERC Glossary Terms definition is modified. To address our concerns, we offer the following changes to the proposed SAR (in boldface below):</p> <p><b>Purpose or Goal:</b></p>	

The goal of this project is to **revise the NERC Glossary of Terms definitions for Generator Owner and Generator Operator to include generator owners and operators that own and maintain non-BES inverter based generating resources (IBRs) that have an aggregate nameplate capacity of greater than or equal to 20 MVA, are operated together through a common facility-level controller as a single resource and connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV.**

**Project Scope:**

**Revise the NERC Glossary of Terms definitions for Generator Owner and Generator Operator to include generator owners and operators that own and maintain non-BES inverter based generating resources (IBRs) that have an aggregate nameplate capacity of greater than or equal to 20 MVA, are operated together through a common facility-level controller as a single resource and connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV and are controlled by a common plant controller** and propose an implementation plan for these definitions that is consistent with the November 17, 2022 FERC order.

**Detailed Description:**

**Revise the definitions for Generator Owner and Generator Operator in the NERC Glossary of Terms to include generator owners and operators that own and maintain non-BES inverter based generating resources (IBRs) that have an aggregate nameplate capacity of greater than or equal to 20 MVA, are operated together through a common facility-level controller as a single resource and connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV and are controlled by a common plant controller**

This **drafting team (DT)** should also **assess the impact of these changes on all affected NERC Reliability Standards** and develop an implementation plan for **those standards affected**, consistent with FERC's November 17, 2022 IBR Registration order.

Further, FirstEnergy asks for clarification of connections through the Distribution that would fall under the scope of the NERC Glossary of Terms and pending standards to ensure the assigned responsibility be defined for the GO and GOP.



We find situations on the Distribution side has little impact on the Transmission System and by clearly declaring this separation would ease monitoring, operating and reporting from the Distribution System that would otherwise be held for the Transmission System.

Likes 0

Dislikes 0

**Response**

Thank you for your participation and comments. The drafting team understands these concerns and will be working to address this SAR in conjunction with SAR submitted by TAPS (another SAR) to ensure the definition meets the intent of reliability. The drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

**David Jendras Sr - Ameren - Ameren Services - 1,3,6**

**Answer** Yes

**Document Name**

**Comment**

Ameren would like more clarity around what NERC is asking for if these changes have already been incorporated into the Rules of Procedure and approved. Additionally, we agree with EEI's and NAGF's comments.

Likes 0

Dislikes 0

**Response**

Thank you for your participation and comment. The change in the Rules of Procedure modified the definitions of the Generator Owner and Generator Operator entities. This change in definitions under the Rules of Procedure did not modify the definition of Generator Owner or Generator Operator as used in the "Glossary of Terms Used in NERC Reliability Standards". This project will modify the terms used in the "Glossary of Terms Used in NERC Reliability Standards" to include the Class 2 generator entities. The drafting team will be working on industry outreach to promote better understanding of this particular project and the SARs associated.

Please see the drafting team's response to NAGF and EEI comments.

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC**

**Answer** Yes

**Document Name**

**Comment**

Please add the development of a Category 2 GO/GOP Definition Reference Document to this SAR explaining how to apply the Category 2 GO/GOP definition, similar to the BES Definition Reference Document that was developed for the application of the BES Definition.

Please add that FERC approved the revised NERC Rules of Procedure on June 27, 2024, regarding the definitions of GO and GOP.

Please add that a comprehensive assessment of all NERC Reliability Standards applicable to the GO and GOP functions should be done regarding the development of the implementation plan.

Likes 0

Dislikes 0

**Response**

Thank you for your participation and recommendations.

As detailed in the Enhancing NERC Standard Processes document, recommendation 2c states: “NERC Staff recommends that the Standards Committee, working with NERC Staff, provide guidance to drafting teams on how they should approach the SAR phase for a given project. Drafting teams should describe accurately the scope of the issue, the technical foundation, and, where appropriate, provide illustrative solutions that could be considered. The drafting team, however, should not attempt to limit potential outcomes through prescriptive or limiting language, which could hamper a drafting team’s ability to consider alternate approaches raised by stakeholders during comment periods.” The purpose of the SAR is to document “why” a project is needed rather than “how” project objectives will be achieved or implemented. As such the drafting team will modify the Generator Owner and Generator Operator definitions as described in the SAR and

develop an implementation plan which supports the modifications. The drafting team will take your Definition Reference Document recommendation into consideration, in which the industry may use the document as an additional tool.

The drafting team has added the FERC approved, as listed in your recommendation. The drafting team is working diligently to ensure all impacted applicable standards are identified.

In addition, and as listed within the SAR, the drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

**Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<i>The NAGF recommends that the "Other" check box be selected and specify "Implementation Plan development" in the SAR Type section to support the implementation plan to be created for the revised Generator Owner/Generator Operator (GO/GOP) definitions.</i>	
Likes 0	
Dislikes 0	

**Response**

Thank you for your participation and comment. The drafting team has taken your recommendation into consideration and has updated the SAR to include the Implementation Plan.

As a drafting team develops a proposed Reliability Standard, they are required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. The minimum requirements are outlined in the NERC Standard Processes Manual of Appendix 3A Section 4.4.3.

**Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable**

<b>Answer</b>	Yes
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<b>Document Name</b>	
<b>Comment</b>	
<p>While EEI does not oppose this SAR, we are concerned that the definitions contained in the NERC Rules of Procedure (Appendix 5B; Statement of Compliance Registry Criteria, Revision 8) do not have sufficient details to ensure consistent and unambiguous application within the NERC Reliability Standards. To address this concern, we recommend, similar to what was done with the Bulk Electric System definition, a companion Definition Reference document be developed for industry review, comment, and approval as a critical component of this project.</p> <p>EEI also recommends that in addition to the development of the implementation plans for the identified Reliability Standards identified in this SAR, the DT should consider doing a comprehensive assessment of all other NERC Reliability Standards that contain applicability for GOs and GOPs to ensure the obligations under those standards are not impacted in ways that might not be intended with the changes to these two definitions.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your participation and recommendations. As detailed in the Enhancing NERC Standard Processes document, recommendation 2c states: “NERC Staff recommends that the Standards Committee, working with NERC Staff, provide guidance to drafting teams on how they should approach the SAR phase for a given project. Drafting teams should describe accurately the scope of the issue, the technical foundation, and, where appropriate, provide illustrative solutions that could be considered. The drafting team, however, should not attempt to limit potential outcomes through prescriptive or limiting language, which could hamper a drafting team’s ability to consider alternate approaches raised by stakeholders during comment periods.” The purpose of the SAR is to document “why” a project is needed rather than “how” project objectives will be achieved or implemented. As such the drafting team will modify the Generator Owner and Generator Operator definitions as described in the SAR and develop an implementation plan which supports the modifications. The drafting team will take your Definition Reference Document recommendation into consideration, in which the industry may use the document as an additional tool.</p> <p>As part of the SAR, the drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.</p>	

<b>Hayden Maples - Evergy - 1,3,5,6 - MRO</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the North American Generator Forum (NAGF) on question 1	
Likes	0
Dislikes	0
<b>Response</b>	
Thank you for your participation. Please see the drafting team's response to NAGF and EEI comments.	
<b>Deborah Currie - Southwest Power Pool Regional Entity - 2 - MRO, Group Name IRC SRC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>The proposed SAR indicates that the Standard Drafting Team (SDT) should develop an implementation plan or plans for applicable standards consistent with FERC’s November 17, 2022 IBR Registration order and provides a discrete list of standards that the SDT may need to address. The ISO/RTO Council (IRC) Standards Review Committee (SRC) is uncertain whether the SAR is directing the drafting team to develop a single, comprehensive implementation plan that addresses all applicable standards or a series of individual implementation plans, each of which addresses only one of the applicable standards. The SRC recommends that the SAR be revised to clarify which approach the drafting team is required to take, or whether the drafting team has the flexibility to choose either approach.</p> <p>The SRC also believes the SAR should be more definitive about the need for the SDT to develop an implementation plan or plans for applicable standards. Instead of suggesting a set of standards that “may” be applicable, the SAR should positively identify all standards that the SDT should consider for applicability. Any standard that is currently applicable to GOs or GOPs should be considered for applicability – some standards that are conspicuously absent from the list in the SAR include: MOD-026-1, MOD-027-1, PRC-024-3, and PRC-025-2 -</p>	

especially when the SAR section about other standards that should be assessed for impact identifies “none”. The SAR must be clear to ensure all known standards are identified, however through the course of SDT discussions and the comment process, there may be a need for the SDT to address standards not identified at the SAR stage.

Likes 0

Dislikes 0

**Response**

Thank you for your participation and recommendation. As detailed in the Enhancing NERC Standard Processes document, recommendation 2c states: “NERC Staff recommends that the Standards Committee, working with NERC Staff, provide guidance to drafting teams on how they should approach the SAR phase for a given project. Drafting teams should describe accurately the scope of the issue, the technical foundation, and, where appropriate, provide illustrative solutions that could be considered. The drafting team, however, should not attempt to limit potential outcomes through prescriptive or limiting language, which could hamper a drafting team’s ability to consider alternate approaches raised by stakeholders during comment periods.” The purpose of the SAR is to document “why” a project is needed rather than “how” project objectives will be achieved or implemented. As such the drafting team will modify the Generator Owner and Generator Operator definitions as described in the SAR and develop an implementation plan which supports the modifications. As part of the SAR, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

**Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2**

**Answer** Yes

**Document Name**

**Comment**

ERCOT joins the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and adopts them as its own.

Likes 0

Dislikes 0

**Response**

Thank you for your participation. Please see the drafting team's response to ISO/RTO Council (IRC) Standards Review Committee (SRC).

**Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6**

**Answer** Yes

**Document Name**

**Comment**

AZPS supports the following comments that were submitted by EEI on behalf of its members:

While EEI does not oppose this SAR, we are concerned that the definitions contained in the NERC Rules of Procedure (Appendix 5B; Statement of Compliance Registry Criteria, Revision 8) do not have sufficient details to ensure consistent and unambiguous application within the NERC Reliability Standards. To address this concern, we recommend, similar to what was done with the Bulk Electric System definition, a companion Definition Reference document be developed for industry review, comment, and approval as a critical component of this project.

EEI also recommends that in addition to the development of the implementation plans for the identified Reliability Standards identified in this SAR, the DT should consider doing a comprehensive assessment of all other NERC Reliability Standards that contain applicability for GOs and GOPs to ensure the obligations under those standards are not impacted in ways that might not be intended with the changes to these two definitions.

Likes 0

Dislikes 0

**Response**

Thank you for your participation. Please see the drafting team's response to EEI comments:

As detailed in the Enhancing NERC Standard Processes document, recommendation 2c states: "NERC Staff recommends that the Standards Committee, working with NERC Staff, provide guidance to drafting teams on how they should approach the SAR phase for a given project. Drafting teams should describe accurately the scope of the issue, the technical foundation, and, where appropriate, provide illustrative solutions that could be considered. The drafting team, however, should not attempt to limit potential outcomes through prescriptive or limiting language, which could hamper a drafting team's ability to consider alternate approaches raised by stakeholders during comment periods." The purpose of the SAR is to document "why" a project is needed rather than "how" project objectives will be achieved or implemented. As such the drafting team will modify the Generator Owner and Generator Operator definitions as described in the SAR and

develop an implementation plan which supports the modifications. The drafting team will take your Definition Reference Document recommendation into consideration, in which the industry may use the document as an additional tool.

As part of the SAR, the drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

**Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0

**Response**

Thank you for your participation and comment.

**Brian Van Gheem - Radian Generation - NA - Not Applicable - NA - Not Applicable**

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	

1. We observe that a second Standard Authorization Request (SAR) has been assigned to this project. That second SAR is significantly different. We believe the NERC Standards Committee should receive comments from both requests before directing a Standard Drafting Team (SDT) to proceed. Under this SAR, we understand the SDT was to revise the definitions of Generator Owner and Generator Operator with the language recently adopted under Appendix 2 of the NERC Rules of Procedure. This revision would split the current definitions into two separate categories with Category 1 defining the existing set of registered entities. While this approach does appear less complex than the second SAR:
  - i. We believe the NERC Standards Committee should delay action on this SAR to consult with the Compliance & Certification Committee (CCC). This would allow the CCC an opportunity in providing input on the consolidation of the two SARs and



developing recommendations on specific skill sets that SDT candidates should possess to ensure the Standards Committee has qualified candidates to choose from when selecting the SDT members. Such an opportunity is in alignment with the CCC’s ongoing responsibilities to support the rollout of key ERO Enterprise Compliance Monitoring and Enforcement activities.

- ii. We believe NERC Staff should circulate a list of all NERC and Regional Reliability Standards that have an applicability of Generator Owner and Generator Operator that would be impacted by the change in definitions. We understand a similar list was circulated within the ERO Enterprise in late 2023 but was never formally shared with industry. The formal publication of that list will provide some initial insight.
- iii. We believe this project’s SDT should initially collect informal stakeholder feedback from various technical workshops. These workshops should individually focus on specific Reliability Standard Families, scheduled far enough in advance to gain industry support, and scheduled far enough apart to obtain constructive comments by limited industry resources. A period of two months between workshops should be sufficient to allow adequate participation.

Likes 0

Dislikes 0

**Response**

Thank you for your participation and recommendations. The drafting team, in conjunction with both the NERC Standards Committee and Compliance & Certification Committee, is working to address both industry SARs. Your suggestion as been considered, but unfortunately is not plausible at this time due to federal constraints. The drafting team understands the confusion in which both SARs may cause, but is prepared to run both paths in parallel, ensuring the outcome of the definitions meet the intent of reliability. The drafting team will be working on industry outreach and further educational engagements to help clarify both SARs and the overall path that must be taken.

**2. Provide any additional comments for the SAR drafting team to consider, if desired.**

**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC**

**Answer**

**Document Name**

**Comment**

WECC suggests the DT consider excluding BAL-001-TRE-2 and delegate the change to Texas RE. The changes to the other Standards should not be delayed or inhibited because of possible additional efforts at the Regional level. There is the possibility that Texas RE participants may not agree to the same language or be on the same approval schedule based on the Regional Standards Development Process. As the Standard is a Regional Standard, Texas RE should handle the efforts and collaboration with NERC be handled accordingly.

SAR should also address other issues within the list of Standards. Case in point, consider adjustments to PRC-005-6 as PRC-017-1 will be retired March 31, 2027 per the PRC-005-2(i) and PRC-005-6 Implementation Plan. If the SAR team decides to make the change to applicability in PRC-017-1 it appears to be effort that will need to be spent again on PRC-005-6. Additionally, there are changes needed in PRC-017-1 that were not addressed during the development of the “new” RAS definition. Particularly, R2 references a “Regional Reliability Organization”, fails to utilize approved template language in the latter parts (e.g., “D: Compliance”), fails to identify Data Retention levels, and does not reflect VSL/VRF correctly. It would be more effective use of the teams time to address PRC-005-6.

The WECC Variance in VAR-001-5 is more than a simple applicability change. The approved definition of Generator Operator is:

“Generator Operator” means the entity that: 1) operates generating Facility(ies) and performs the functions of supplying energy and Interconnected Operations Services (Category 1 GOP); or 2) operates non-BES inverter based generating resources that either have or contribute to an aggregate nameplate capacity of greater than or equal to 20 MVA, connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV (Category 2 GOP).”

The WECC Variance completely changes Requirement R4 and R5 of the nationwide Standard and provides new language (Requirement R4 is deleted and R5 language was replaced). In E.A.13 the phrasing requires significant change as it currently states “Each.....to the Generator Operators for each of their generation resources that are on-line and part of the Bull Electric System within the Transmission Operator Area...” Significant issues to consider- Category 2 GOP operates “non-BES inverter based resources” which means for inclusion of Category 2

GOP in the WECC Interconnection for VAR-001-5 requires E.A. 13 changes in language. Additionally, the definition and use of Transmission Operator Area does not support non-BES inverter based generating resources. TOP Area definition is: “The collection of Transmission assets over which the Transmission Operator is responsible for operating. “ The definition of “Transmission” (used within TOP Area definition) is “An interconnected group of lines and associated equipment for the movement or transfer of electric energy between points of supply and points at which it is transformed for delivery to customers or is delivered to other electrical systems.” A TO may not have “lines and associated equipment” at the locations specified in the Transmission definition for the TOP to be responsible for operating.

WECC Variance E.A.14 language brings its own set of issues (e.g., What is considered the “point of interconnection”?) that will likely require language changes.

E.A.17 applicability for non-BES inverter-based generating resources would need researched to ensure the capability exists and would likely require language changes.

WECC will initiate a SAR to update the WECC Variance in VAR-001-5 and upon completion submit the proposed revisions to NERC for BOT approval and subsequent FERC filing.

For VAR-002-4.1 there is a footnote (Footnote 5) in Requirement R5 that would need revised that could impact language within the Requirement.

In short, WECC supports the approach to consistency and applicability but there are additional issues (in terms of applicability) that may need addressed in Requirement language to actually make GO/GOP Category 2 entities responsible for the actions within some of the Standards listed. It is understood that this is a definition change and is not specifically addressing Standards changes as a result of the definition change, but the indication of applicability needs some more review regarding some of the Standards noted above.

Likes	0
Dislikes	0

**Response**

Thank you for your participation and recommendation. As part of the SAR, the drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

**Brian Van Gheem - Radian Generation - NA - Not Applicable - NA - Not Applicable**

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
1. Thank you for the opportunity to comment.	
Likes 0	
Dislikes 0	
<b>Response</b>	
The drafting team appreciates your participation and comments.	
<b>Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
None	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your participation.	
<b>Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

**Response**

Thank you for your participation and comment.

**Deborah Currie - Southwest Power Pool Regional Entity - 2 - MRO, Group Name IRC SRC**

**Answer**

**Document Name**

**Comment**

The implementation plan or plans developed by the SDT will lay out when each applicable Reliability Standard will become enforceable for the GO/GOP Category 2 entities. When the implementation plan or plans are posted so that the GO/GOP Category 2 entities will know when they are subject to compliance, the SRC notes that the entities responsible for modeling the Category 2 assets will also need to be informed of the implementation dates and provided with contact information for Category 2 entities.

Finally, the SRC notes that the project scope is very brief and only includes a task of matching the GO/GOP definition in the NERC Glossary of Terms with the Rules of Procedure. The detailed description goes on to identify a need to develop an implementation plan or plans that will impact many Reliability Standards. The need to develop an implementation plan or plans that will impact multiple standards is a significant part of this project and should be identified within the project scope.

Likes 0

Dislikes 0

**Response**

The DT team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

**Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF**

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p><i>NAGF membership provides the following items for consideration: Consider the example of GO/GOP facilities connected at 69kV that are not connected to BES transmission and as such, the transmission facility could be owned by a non-registered entity. If this is the case, it is not clear who their PC, TO, TOP or TP would be. NAGF members have seen instances where TPs tell registered BES generators that they are not their TP and the Regional Entity tells the GO that they are. NERC will need to assist new entry GO/GOP facilities to resolve such issues.</i></p> <p><i>Under VAR-001, the TOP must provide a voltage schedule to the GOP and then VAR-002 requires the GOP to maintain that schedule or notify the TOP. It is not clear if the voltage schedule must come from a registered TOP or if the voltage schedule is expected to come from the non-registered owner of the 69kV line. If the owner of the 69 kV line is not a registered TOP, is the expectation that a registered TOP will provide a schedule that supersedes the 69kV line's owners schedule?</i></p> <p><i>For the Standards listed in the SAR, the above issues will cause registration and enforcement problems with the VAR Standards, MOD-032 and TOP-003. These issues must be addressed prior to or in parallel with GO/GOP definition changes.</i></p>	
Likes	0
Dislikes	0
<b>Response</b>	
<p>Thank you for your participation and recommendation. As part of the SAR, the drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.</p>	
<b>Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	

<b>Document Name</b>	
<b>Comment</b>	
BPA recognizes the need for changes regarding the IBR. BPA has no comments at this time but does support the need to define IBR characteristics.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your participation and comment.	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Terms already finalized without industry input and now is at mercy of FERC already approving. The process of assigning a project and posting a SAR for items and actions that NERC has already been initiated into their Registration seems out of step. FirstEnergy questions if this is going to be the normal mode of operation and request future integrations include the opportunity for industry input.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your participation and comment. While your concern is understood it falls outside the process of the drafting team.	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	
<b>Document Name</b>	

**Comment**

Texas RE supports the objective of the SAR to align the NERC Glossary of Terms definitions of Generator Owner and Generator Operator with the revised definitions contained in the Rules of Procedure registry criteria for Generator Owner and Generator Operator.

Likes 0

Dislikes 0

**Response**

Thank you for your participation and comment.

**Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name** Black Hills Corporation - All Segments

**Answer**

**Document Name**

**Comment**

Black Hills Corporation agrees with the additional comments provided by NAGF.

Likes 0

Dislikes 0

**Response**

Thank you for your participation and comment.

**Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF**

**Answer**

**Document Name**

**Comment**



Duke Energy agrees with and recommends implementation of NAGF comments.

Likes 0

Dislikes 0

**Response**

Thank you for your participation and comment.

**Alison MacKellar - Constellation - 5,6**

**Answer**

**Document Name**

**Comment**

Constellation feels the line should be drawn on what is subject to NERC standards as many small behind the meter IBR facilities would not be economical to run if subjected to NERC tests and modeling requirements.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

**Response**

Thank you for your participation and comment. While your concern is understood it falls out of the realm of this SAR. This concern would be better addressed within the scope of the following milestone 3 projects:

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

**Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5**

**Answer**

<b>Document Name</b>	
<b>Comment</b>	
Definitions should align exactly with one another.	
Likes 0	
Dislikes 0	
<b>Response</b>	
Thank you for your participation and comment.	
<b>Chantal Mazza - Hydro-Quebec (HQ) - 1 - NPCC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Please change the sentence “these ROP changes are pending before FERC” to reflect FERC approval of the ROP changes on June 27th in docket RR24-2-000.	
Please change “a definition of Inverter Based Resources is being developed” to has been developed and recently approved in project 2020-06.	
Likes 0	
Dislikes 0	
<b>Response</b>	
The drafting team agrees with the comment and moving forward we will be using the approved definitions as needed.	
<b>Kimberly Turco - Constellation - 5,6</b>	
<b>Answer</b>	

<b>Document Name</b>	
<b>Comment</b>	
<p>Constellation feels the line should be drawn on what is subject to NERC standards as many small behind the meter IBR facilities would not be economical to run if subjected to NERC tests and modeling requirements.</p> <p>Kimberly Turco on behalf of Constellation Segments 5 and 6</p>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<p>Thank you for your participation and comment. While your concern is understood it falls out of the realm of this SAR. This concern would be better addressed within the scope of the following milestone 3 projects:</p> <p>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</p>	
<b>Marty Hostler - Northern California Power Agency - 3,4,5,6</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
None	
Likes 0	
Dislikes 0	
<b>Response</b>	

