Unofficial Comment Form

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

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on an additional Standard Authorization Request (SAR) for **Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator); SAR IBR Registration and Standards Applicability Glossary Update** by **8 p.m. Eastern, Monday, September 16, 2024.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2024-01-Rules-of-Procedure-Definitions-Alignment_GO-and-GOP.aspx). If you have questions, contact Senior Standards Developer, Jessica Harris (via email) or at 404-710-4885.

## Background Information

The project will address concerns regarding the reliability impacts of inverter-based resources (IBRs) on the Bulk-Power System that do not meet the current definition of Bulk Electric System (BES) and have not historically been required to be registered with NERC for compliance with the NERC Reliability Standards. Such concerns are discussed in detail in the Federal Energy Regulatory Commission (FERC) November 17, 2022 order in [Docket No. RD22-4-000](https://www.ferc.gov/media/e-1-rd22-4-000), in which FERC directed NERC to develop a work plan to address the registration of these IBRs and ensure their compliance with Reliability Standards by certain milestone dates. See Registration of Inverter-Based Resources, 181 FERC ¶ 61,124 (Nov. 17, 2022).

This additional SAR concerns an additional definition to be considered for those IBRs that fall below the BES criteria and meet the new registration classification. This SAR also concerns additional definitions for “non-material IBR” and “IBR-DER” as referenced within FERC Order No. 901.[[1]](#footnote-2)

In March 2024, NERC proposed changes to its Rules of Procedure registry criteria to include certain non-BES IBRs in the Generator Owner (GOs) and Generator Operator (GOP) categories. Revising the GO and GOP definitions in the NERC Glossary of Terms to match the registry criteria will ensure these previously unregistered IBRs will be subject to the NERC Reliability Standards and mitigate their impacts on the BPS. On June 27, 2024 FERC approved the proposed revisions to the NERC Rules of Procedure.[[2]](#footnote-3) Per the ruling:

Pursuant to section 215(f) of the FPA, we approve NERC’s proposed revisions to its Rules of Procedure as just, reasonable, not unduly discriminatory or preferential, and in the public interest

because these revisions should ensure that unregistered IBRs will become subject to Reliability Standards currently applicable to generator owners and operators in May 2026 and then become subject to additional Reliability Standards following the implementation of projects developed in accordance with Order No. 901.[[3]](#footnote-4)

This project will continue to be apprised of updates to the NERC IBR Registration Initiative[[4]](#footnote-5) to ensure reasonable effective dates are implemented and consistent with the NERC Registration Rollout strategy for Category 2 Generator Owners and Generator Operators.

## Questions

1. Do you agree with the proposed project scope to create a new definition for Sub-BES IBRs? Please provide any additional information to support your response.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the proposed project scope to include in a new definition for Sub-BES IBRs or within a new or revised Standard to provide for “ex ante certainty” regarding which IBR facilities are considered to be Sub-BES IBRs? Please provide any additional information to support your response.

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the proposed project scope to create a new definition for Non-Material IBRs and IBR-DERs? Please provide any additional information to support your response.

[ ]  Yes

[ ]  No

Comments:

1. Provide any additional comments for the drafting team to consider, if desired.

Comments:

1. <https://www.ferc.gov/media/e-1-rm22-12-000> [↑](#footnote-ref-2)
2. <https://www.ferc.gov/media/e-6-rr24-2-000> [↑](#footnote-ref-3)
3. Ibid at P 1. [↑](#footnote-ref-4)
4. <https://www.nerc.com/pa/Documents/IBR_Quick%20Reference%20Guide.pdf> [↑](#footnote-ref-5)