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 for **Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)** by **8 p.m. Eastern,** **Wednesday, May 7, 2025.   
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](mailto:Jessica.Harris@nerc.net) (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 (November 17, 2022).

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.[[1]](#footnote-2) 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.[[2]](#footnote-3)

This project will continue to be apprised of updates to the NERC IBR Registration Initiative[[3]](#footnote-4) 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 that the proposed modified definitions of Generator Owner and Generator Operator within the NERC Glossary of Terms align with the FERC approved definitions in the NERC Rules of Procedure registry criteria to ensure the inclusion of ​ inverter-based resources (IBRs) on the Bulk-Power System (BPS) that do not meet the current definition of Bulk Electric System (BES), but do meet registration criteria? If you do not agree, or if you agree but have suggestions for improvement, please provide your recommendation, if desired.

Yes

No

Comments:

1. Do you agree that the proposed Implementation Plan for the standards that are enforceable with the modified definitions of Generator Owner and Generator Operator within the NERC Glossary of Terms are consistent with FERC’s November 17, 2022 IBR Registration order in Docket No. RR22-4-000? If you do not agree, or if you agree but have suggestions for improvement, please provide your recommendation, if desired.

Yes

No

Comments:

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

Comments:

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