

Comment Report

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 Ballots:

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.

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.**

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

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

Answer No

Document Name

Comment

None at this time.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 3,4,5,6

Answer Yes

Document Name

Comment

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

Response

Thomas Foltz - AEP - 3,5,6

Answer Yes

Document Name

Comment

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

Response**Kimberly Turco - Constellation - 5,6****Answer**

Yes

Document Name**Comment**

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

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

Yes

Document Name**Comment**

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

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

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Black Hills Corporation agrees with the comments from EEI and NAGF:

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.

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.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

FirstEnergy supports EEI comments that state:

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.

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):

Purpose or Goal:

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

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

Answer	Yes
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Document Name	
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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	
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	
<p>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.</p> <p>Please add that FERC approved the revised NERC Rules of Procedure on June 27, 2024, regarding the definitions of GO and GOP.</p> <p>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.</p>	
Likes	0
Dislikes	0

Response	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	Yes
Document Name	
Comment	
<p><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></p>	
Likes	0
Dislikes	0

Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	

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

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer

Yes

Document Name

Comment

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

Response

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

Answer

Yes

Document Name

Comment

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.

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 - 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

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

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

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

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

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

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

Answer

Document Name

Comment

1. Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

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

Answer

Document Name

Comment

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.

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?

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.

Likes 0

Dislikes 0

Response

Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Document Name

Comment

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

Response

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

Answer

Document Name

Comment

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

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

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

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

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

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

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

Answer

Document Name

Comment

Definitions should align exactly with one another.

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 1 - NPCC

Answer

Document Name

Comment

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

Response

Kimberly Turco - 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.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 3,4,5,6

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response