

Comment Report

Project Name: 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) - Standard Authorization Request - IBR

Comment Period Start Date: 8/16/2024

Comment Period End Date: 9/16/2024

Associated Ballots:

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

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.
2. 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.
3. 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.
4. Provide any additional comments for the 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
MRO	Anna Martinson	1,2,3,4,5,6	MRO	MRO Group	Shonda McCain	Omaha Public Power District (OPPD)	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jamison Cawley	Nebraska Public Power District	1,3,5	MRO
					Jay Sethi	Manitoba Hydro (MH)	1,3,5,6	MRO
					Husam Al-Hadidi	Manitoba Hydro (System Performance)	1,3,5,6	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Jaimin Patal	Saskatchewan Power Corporation (SPC)	1	MRO
					George Brown	Pattern Operators LP	5	MRO
					Larry Heckert	Alliant Energy (ALTE)	4	MRO
					Terry Harbour	MidAmerican Energy Company (MEC)	1,3	MRO
					Dane Rogers	Oklahoma Gas and Electric (OG&E)	1,3,5,6	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
					Andrew Coffelt	Board of Public Utilities-Kansas (BPU)	1,3,5,6	MRO
Peter Brown	Invenergy	5,6	MRO					

					Angela Wheat	Southwestern Power Administration	1	MRO
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Joshua Phillips	Southwest Power Pool	2	MRO
					Patrick Tuttle	Oklahoma Municipal Power Authority	4,5	MRO
Southwest Power Pool, Inc. (RTO)	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
DTE Energy - Detroit Edison Company	Mohamad Elhusseini	3,5		DTE Energy	Mohamad Elhusseini	DTE Energy	5	RF
					Patricia Ireland	DTE Energy	4	RF

					Marvin Johnson	DTE Energy - Detroit Edison Company	3	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	6	NPCC

				Resources, Inc.			
				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
				Steve Rueckert	WECC	10	WECC

Western Electricity Coordinating Council	Steven Rueckert			WECC Entity Monitoring	Curtis Crews	WECC	10	WECC
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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.

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer Yes

Document Name

Comment

Yes, this term should be defined by combining the now FERC approved registration threshold in the ROP revisions and the IBR definition approved by the ballot body.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

When it is stated SUB BES IBR, does that mean IBRs below 20 MW and connected at 60 KV or more? Or is it still using 100 KV connection as the definition of BES?

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Yes, although I would not call them "Sub-BES IBRs" as this could encompass both BPS connected IBRs and Distribution connected IBRs. I would recommend aligning the term to the new registrations and call them Category 2 IBRs, or Cat2 IBRs.

Likes 0

Dislikes 0

Response

Rebecca Baldwin - Transmission Access Policy Study Group - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

Yes. A definition of Sub-BES IBRs is needed to facilitate the development of Milestone 3 and 4 standards in compliance with Order 901, and for future IBR-related standards efforts. FERC has directed that non-BES IBR facilities that meet the new Category 2 registration criteria be subject to certain standards as laid out in Order 901. Drafting teams will thus need to be able to refer to this class of facilities in a way that is both clear and consistent. Clarity regarding what facilities are included in proposed standards/requirements is necessary so that stakeholders can comment effectively on drafts, and so that registered entities and regulators can be confident that the final standard is fair and enforceable and will achieve its reliability goals.

Some of the delay in the development of the Milestone 2 standards is attributable to (a) those projects' dependence on a definition of "Inverter-Based Resource" that was under development at the same time as the Milestone 2 projects, as well as (b) the lack of a defined term for non-BES IBR facilities that meet the Category 2 registration criteria, which led to inconsistencies in referring to those facilities across projects. While two of the Milestone 2 standards have been approved by the ballot pool, PRC-029 has not, and is the subject of the NERC Board's first exercise of Rule 321. In addition, despite attempts at coordination among the Milestone 2 drafting teams, the three standards' applicability sections are inconsistent; PRC-030 has been posted for an additional ballot to, among other things, remedy that inconsistency. This SAR will help to prevent a repeat of the Milestone 2 experience by proactively developing defined terms so that drafting teams working on Milestone 3 and 4 projects will have the appropriate tools at hand when they need them, allowing those SDTs to avoid unnecessary delays and to produce better standards that are clearer and more protective of reliability.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

The NAGF supports the creation of a new definition for Sub-BES IBRs.

Likes 0

Dislikes 0

Response

Bill Zuretti - Electric Power Supply Association - 5

Answer	Yes
Document Name	
Comment	
A definition of Sub-BES IBRs will enable a better focused standards development process and provide needed clarity in the development of Milestone 3 and 4 standards in compliance with Order 901, and for future IBR-related standards efforts. Clarity regarding what facilities are included in proposed standards/requirements is necessary so that stakeholders can understand their obligations and compliance capabilities, allowing them to comment effectively on drafts, leading to a final standard that is clear and enforceable.	
Likes 0	
Dislikes 0	
Response	
Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
SPP has collaborated with SRC on developing comments for this SAR. SPP agrees with SRC comments.	
Likes 0	
Dislikes 0	
Response	
Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3,5 - WECC	
Answer	Yes
Document Name	
Comment	
While other projects are defining what this SUB-BES definition is, it needs to be approved and balloted like othe NERC glossary of term definitions. A definition of Sub-BES IBRs is needed to facilitate the development of Milestone 3 and 4 standards in compliance with Order 901, and for future IBR-related standards efforts	
Likes 0	
Dislikes 0	
Response	

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer

Document Name

Comment

Yes, agree.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer

Document Name

Comment

Constellation agrees with NAGF comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

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

Answer

nO

Document Name

Comment

Duke Energy agrees with and recommends implementation of EEI comments.

Likes 0

Dislikes 0

Response

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

Answer

nO

Document Name

Comment

Use the “Non-BES Inverter-Based Resource” definition proposed for PRC-030-1. Simply add that to the Glossary and there should not be any real resistance as PRC-030-1 has passed. Creating a new definition may invalidate the efforts for PRC-030-1 (as well as others that may consider the use).

Likes 0

Dislikes 0

Response

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

Answer

nO

Document Name

Comment

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

EEI does not support defining in the Glossary of Terms facilities that fall outside of NERC Reliability Standards. However, we also believe that all of the concerns express in this SAR can be readily and effectively address through the development of a companion Technical Reference document similar to what was developed for the BES definition to provide additional clarity. And why we support some of the concerns expressed in this SAR, we do not support or believe there is a compelling need for this overly prescriptive approach as proposed.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5,6

Answer

nO

Document Name

Comment

AEP believes that the Category 2 for GOs and GOPs is explicitly clear as currently specified in the NERC ROP, and requests that this proposed SAR be withdrawn from consideration and not pursued in any way.

Notwithstanding the above response, if the primary intent is to determine which standards fall into a Category 2 classification, then we recommend a different approach be taken from what is suggested in the SAR. AEP sees value in clarifying the assets that the SAR refers to as Sub-BES DERs, but we do not believe that establishing a glossary definition for Sub-BES DERs is the best way to achieve this clarity. We also do not agree with pursuing glossary definitions for Non-Material DERs and IBR-DERs which are clearly out of scope. We believe a preferable approach would instead be for the establishment of new Functional Entities such as GO Category 1, GO Category 2, GOP Category 1, and GOP Category 2, the categories for which are provided in the two new definitions for GO and GOP. These two categorizations are provided within the new ROP definitions for GO and GOP, but if an entity cannot register as a Category 1 or 2, and thus cannot be added as a Functional Entity within a standard’s Applicability, then that specificity cannot be extended to the standards themselves. While we acknowledge that this would take time for them to be added to the ROP, for entities to register for

them as necessary, and for all the necessary standards to be revised, we believe the final results would be far superior to that of simply pursuing glossary definitions of the categorized assets. In addition, we believe establishing new Functional Entities for these categories would also allow improvements to be made for Category 1, as the current definitions in the ROP do not explicitly limit the category to the BES, unlike Category 2 which is clearly non-BES in nature.

Likes 0

Dislikes 0

Response

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

Answer

nO

Document Name

Comment

FirstEnergy requests clarification on how the DT will address 3rd party owned devices to ensure they follow these proposed updates.

Likes 0

Dislikes 0

Response

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

Answer

nO

Document Name

Comment

Black Hills Corporation agrees that Applicable Facilities need to be clearly identified for each NERC Standard. However, it is unclear if this project is duplicating work already being performed within the NERC SAR that intends to align the ROP definitions for Category 2 GO and GOP with the NERC Glossary of Terms for Reliability Standards. If not, then defining the non-BES IBRs which will be required to register (Category 2 GO/GOP IBRs) and subject to compliance with NERC Standards is necessary. Black Hills Corporation also supports EEI comments regarding creation of a Technical Reference document.

Likes 0

Dislikes 0

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name IRC SRC

Answer

nO

Document Name**Comment**

The ISO/RTO Council's (IRC) Standard Review Committee (SRC) believes that the SAR should be revised to give the SDT the flexibility to determine whether to develop additional defined terms instead of requiring the SDT to develop certain terms. The SRC agrees that the SDT may find it appropriate to develop definitions for Sub-BES IBRs as identified in FERC Order 901 in the course of its work developing an implementation plan(s) for the Reliability Standards impacted by the Category 2 GO/GOP Rules of Procedure change. However, the SRC believes that the SDT might instead determine that the Category 2 definition is sufficient, and no further definitions are necessary. Consequently, the SRC recommends that the SAR be revised to give the SDT this flexibility.

Likes 0

Dislikes 0

Response**Hayden Maples - Evergy - 1,3,5,6 - MRO****Answer**

nO

Document Name**Comment**

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) on question 1

Likes 0

Dislikes 0

Response**Hillary Creurer - Allete - Minnesota Power, Inc. - 1****Answer**

nO

Document Name**Comment**

Minnesota Power supports EEI's comments.

Likes 0

Dislikes 0

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

Answer	nO
Document Name	
Comment	
<p>EI does not support defining in the Glossary of Terms facilities that fall outside of NERC Reliability Standards. However, the concerns expressed in this SAR can be addressed through the development of a companion Technical Reference document similar to what was developed for the BES definition to provide additional clarity. And while we support some of the concerns expressed in this SAR, we do not support or believe there is a compelling need for this overly prescriptive approach as proposed.</p>	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	nO
Document Name	
Comment	
<p>ERCOT joins the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and adopts them as its own.</p>	
Likes 0	
Dislikes 0	
Response	

2. 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.

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

Answer No

Document Name

Comment

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

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

EI does not support the proposal to develop new definitions for Sub-BES IBRs because this issue is already being addressed within the NERC SAR that intends to align the ROP definitions for GO and GOP with the NERC Glossary of Terms for Reliability Standards. We further note that IBR is defined by the Project 2020-06 DT. However, we are supportive of a companion Technical Reference document similar to what was developed for the BES definition.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer No

Document Name

Comment

Part 1 seems to be a path by which responsibility for identifying which IBRs (non-BES, at least) with material impact to the BPS could be shifted back onto the Regional Entities. A lot of commenters asked for similar method to PRC-029 regarding evaluation of what IBRs should require monitoring, but

this text doesn't seem to indicate in any way that facilities meeting the registration threshold would ever be excluded. I would absolutely oppose the method proposed in item 2. No one needs that, and it runs contrary to providing certainty.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer

No

Document Name

Comment

Minnesota Power supports EEI's comments.

Likes 0

Dislikes 0

Response

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC

Answer

No

Document Name

Comment

SPP has collaborated with SRC on developing comments for this SAR. SPP agrees with SRC comments

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 2

Likes 0

Dislikes 0

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name IRC SRC

Answer No

Document Name

Comment

The SRC does not disagree with the principle of providing ex ante certainty for Category 2 IBRs, but believes that in this case this certainty is more appropriately provided through the ERO Enterprise (such as through the registration and certification process and the associated provisions in the NERC Rules of Procedure) rather than through the standards drafting process. Consequently, we recommend that the Section beginning with "In developing a definition of Sub-BES IBRs..." on Page 4 of the SAR be removed in its entirety.

Should this section remain within the SAR, the SRC recommends referencing Appendix 5C of NERC's Rules of Procedure, which contains the process for BES Exception determinations, instead of referencing FERC Order 773-A P110.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

The SAR seeks to Define "Sub-BES IBR" It seems like defining "Non-BES IBRs" would make more sense and allow standards to have a clear alignment to the FERC order, rather than establishing a different term in "SUB-BES IBR". Provide more detail and clarity on applicable terminology.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Black Hills Corporation agrees with comments provided by both EEI and NAGF.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

FirstEnergy requests clarifying the intent of forecasting methods - if this is to include IBR or would IBR be removed, and a forecasting method could be used.

FirstEnergy inquires if the DT would need to consider FERC Order 1920 FERC Order for inclusion in the SAR.

Regarding Aggregation – FirstEnergy requests the need for this to be addressed and clarified as far as what information would be required, who would be responsible and how this would be shared and used.

FirstEnergy finds the devices modifying the load today could become an economic action as this moves forward and questions if NERC is the applicable body to govern this.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5,6

Answer

No

Document Name

Comment

As stated in our response to Question #1, we agree in part with the reliability need as stated in the SAR but do not believe that new glossary definitions for the assets themselves is the best approach for achieving this clarity.

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer	No
Document Name	
Comment	
<p>Part 1 seems to be a path by which responsibility for identifying which IBRs (non-BES, at least) with material impact to the BPS could be shifted back onto the Regional Entities. A lot of commenters asked for similar method to PRC-029 regarding evaluation of what IBRs should require monitoring, but this text doesn't seem to indicate in any way that facilities meeting the registration threshold would ever be excluded. I would absolutely oppose the method proposed in item 2. No one needs that, and it runs contrary to providing certainty.</p> <p>Relevant text from the SAR:</p> <p>In developing a definition of Sub-BES IBRs, the SDT should attempt to provide affected registered entities and CMEP staff with ex ante certainty regarding which IBR facilities qualify as Sub-BES IBRs. This could be done within the Glossary definition itself or via a new or revised Reliability Standard; and/or, if necessary, via recommending changes to NERC's Rules of Procedure.</p> <p>1. For example, rather than simply setting out the thresholds, the Glossary definition could be based on whether there has been a written determination by the applicable Regional Entity that a facility meets the thresholds (e.g., "As determined by the Regional Entity in written notice transmitted to the entity(ies) that own(s) the facility at the time the determination is made, non-BES inverter-based generating resources that aggregate to a total 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.")</p> <p>a. Alternatively, to avoid overburdening Regional Entities, the definition could track the process set out for BES determinations, in which "in the absence of bad faith, if a registered entity applies the [BES] definition and determines that an element no longer qualifies as part of the [BES], upon notifying the appropriate Regional Entity that the element is no longer part of the [BES] the element should not be treated as part of the [BES] unless NERC makes a contrary determination in the exception process." FERC Order 773-A P 110.</p> <p>b. Either of these approaches would likely require changes to Appendix 5C of NERC's Rules of Procedure to make the BES Exceptions Process applicable to determinations of Sub-BES IBR status.</p> <p>2. Alternatively, a Reliability Standard approach could be modeled on the CIP-002 approach to BES Cyber System categorization.</p>	
Likes	0
Dislikes	0
Response	
Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	No
Document Name	
Comment	
<p>AZPS supports the following comments submitted by EEI on behalf of its members:</p>	

EEl does not support the proposal to develop new definitions for Sub-BES IBRs because this issue is already being addressed within the NERC SAR that intends to align the ROP definitions for GO and GOP with the NERC Glossary of Terms for Reliability Standards. We further note that IBR was already defined by the Project 2020-06 DT. However, we are supportive of a companion Technical Reference document similar to what was developed for the BES definition

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Use the "Non-BES Inverter-Based Resource" definition proposed for PRC-030-1. Simply add that to the Glossary and there should not be any real resistance as PRC-030-1 has passed. Creating a new definition may invalidate the efforts for PRC-030-1 (as well as others that may consider the use).

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Duke Energy agrees with and recommends implementation of EEl comments.

Likes 0

Dislikes 0

Response

Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3,5 - WECC

Answer

Yes

Document Name

Comment

Yes. Registered entities and compliance monitoring staff should know from the outset which generation facilities are subject to which standards. This issue is too fundamental, and implicates too many standards, to leave to auditor discretion, potentially subjecting registered entities to extensive noncompliance findings if an auditor interprets the applicable definition differently from the registered entity

Likes 0

Dislikes 0

Response

Bill Zuretti - Electric Power Supply Association - 5

Answer

Yes

Document Name

Comment

It is critical that registered entities and regulators have clarity about which standards will apply to certain generation facilities. Having a clearly defined and more comprehensive set of definitions will allow for a more effective and efficient compliance process for registered entities and auditors/regulators.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

The NAGF provides the following items for consideration: The use of "ex ante certainty" in the SAR document is problematic and requires clarification or removal. This terminology introduces unnecessary complexity and may lead to confusion among industry participants. Identifying facilities that fall under the new sub-BES IBR definition is crucial. However, the proposed approaches raise concerns:

- 1. Regional entity definitions may lead to inconsistencies across different areas.*
- 2. A self-assessment process similar to CIP-002 could be challenging for entities unfamiliar with NERC standards. This approach may result in incomplete or inaccurate identifications, potentially compromising the effectiveness of the new definition.*

NERC should consider alternative methods for facility identification that are clear, consistent, and accessible to all relevant entities, regardless of their familiarity with NERC standards. This may include developing a standardized assessment tool or providing detailed guidance documents to assist entities in determining their status under the new definition. Additionally, NERC must address the potential impact on existing standards and processes before implementing these changes to ensure a smooth transition and avoid unintended consequences.

Likes 0

Dislikes 0

Response	
Rebecca Baldwin - Transmission Access Policy Study Group - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
<p>Yes. Registered entities and compliance monitoring staff should know from the outset which generation facilities are subject to which standards. This issue is too fundamental, and implicates too many standards, to leave to auditor discretion, potentially subjecting registered entities to extensive noncompliance findings if an auditor interprets the applicable definition differently from the registered entity.</p> <p>In addition, where an IBR facility does <i>not</i> meet the new registration thresholds, that facility's host TO or DP will be responsible (pursuant to Order 901 and Milestone 3 standards) for providing data and models of the IBR to grid planners and operators. It is thus vital that the GO/GOP, interconnecting TO/DP, and Regional Entity have a shared understanding regarding the status of each IBR. In the absence of that understanding, IBR data may either be double-counted (reported by both the owner and the host TO/DP) or fall through the cracks (reported by neither entity), undermining the ability to achieve the reliability goal set by FERC.</p>	
Likes	0
Dislikes	0
Response	
Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	
<p>Yes, I think a new definition is appropriate should be called out in the Reliability Standard when appropriate to determine if the Reliability Standard applies to both BES and Sub-BES IBRs.</p>	
Likes	0
Dislikes	0
Response	
Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer

Document Name

Comment

Constellation agrees with NAGF comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer

Document Name

Comment

Yes, agree.

Likes 0

Dislikes 0

Response

3. 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.

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

Answer No

Document Name

Comment

Duke Energy agrees with and recommends implementation of EEI comments.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

It would be beneficial to consider IBR-DER definition but not necessarily a "Non-Material IBR" definition. By default, those IBRs not meeting the Non-BES Inverter-Based Resource definition (proposed PRC-030-1) and a new IBR-DER definition are non-material. Defining a new definition will be a struggle as application of the definition will likely dominate conversations. If this SAR moves forward, focus on defining the term to capture the reliability impacts. Suggest getting data about IBR-DER levels (individual and overall aggregate in a defined area (BA perhaps)) currently implemented to help determine a value threshold if needed.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

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

EEl does not support the proposal to define non-material IBRs and IBR-DERs. However, we are supportive of a companion Technical Reference document similar to what was developed for the BES definition

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5,6

Answer

No

Document Name

Comment

As stated in our response to Question #1, we disagree with creating NERC glossary definitions for Non-Material IBRs and IBR-DERs, as we see no purpose in creating formal terms for assets that are out of scope.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

FirstEnergy does not support the proposal to define non-material IBRs and IBR-DERs given these facilities fall outside of NERC authority and their owners have no obligations under the NERC Reliability Standards. Moreover, there is no confusion over the term DER or which BPS IBRs must register.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Black Hills Corporation agrees with the comments provided by both EEI and NAGF. Black Hills Corporation does not believe NERC should be defining generating units/facilities which fall outside of NERC registration criteria and are not Applicable Facilities within the NERC Standards.

Likes 0

Dislikes 0

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name IRC SRC

Answer

No

Document Name

Comment

See Response to Question 1.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer

No

Document Name

Comment

Minnesota Power supports EEI's comments.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

EEl does not support the proposal to define non-material IBRs and IBR-DERs. However, we are supportive of a companion Technical Reference document similar to what was developed for the BES definition.

Likes 0

Dislikes 0

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

Answer

No

Document Name

Comment

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

Likes 0

Dislikes 0

Response**Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group**

Answer

Yes

Document Name

Comment

Yes, while respecting the IBR definition that has now been approved by the ballot body.

Likes 0

Dislikes 0

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

Answer

Yes

Document Name

Comment

When developing definitions, provide granular explanations, applicability, provide general examples of each category.

Likes 0

Dislikes 0

Response

Rebecca Baldwin - Transmission Access Policy Study Group - NA - Not Applicable - NA - Not Applicable

Answer

Yes

Document Name

Comment

Yes. Order 901's directives apply differently with respect to (1) BES IBR facilities and Sub-BES IBRs (as defined in the SAR); (2) IBR facilities that fall below the revised registration thresholds but are connected to the Bulk Power System (which the SAR refers to as "Non-Material IBRs"); and (3) IBR facilities that are connected to the distribution system (which the SAR mirrors Order 901 in calling "IBR-DERs"). To avoid unnecessary delays, defined terms for all three classes of non-BES IBRs should be developed on an expedited timeframe so that drafting teams working on Milestone 3 and 4 standards can refer to the appropriate classes of IBR facilities clearly and consistently.

It is important to provide some means of ex ante certainty regarding which IBRs fall into each category of facilities. As noted in response to question 2, the categorization of an IBR determines which registered entity—GO/GOP or TO/DP—is responsible for providing data and models of the IBR to grid planners and operators. It is thus vital that a facility's owner/operator, the utility to which it is interconnected, and the Regional Entity be on the same page regarding the status of each IBR.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

The NAGF provides the following items for consideration: The proposed definitions for non-material IBRs and IBR DERs are necessary and warranted. However, incorporating these definitions into the current project scope raises concerns about potential delays and unintended consequences.

- 1. Project timeline: Including these additional definitions may impede the primary objective of aligning glossary terms with Category 2 GO/GOP definitions, which is time-sensitive and critical.*
- 2. Scope expansion: The original intent of this project was to address Category 2 GO/GOP definitions. Broadening the scope to include non-material IBRs and IBR DERs introduces complexity that may not be fully addressed within the current project framework.*
- 3. Separate initiative: NERC should consider developing definitions for non-material IBRs and IBR DERs as a standalone Phase 2 project. This approach would allow for a more focused and thorough examination of these concepts without compromising the timely completion of the primary project goals.*

NERC must carefully weigh the benefits of including these additional definitions against the potential risks of project delays and reduced effectiveness in addressing the core Category 2 GO/GOP alignment issue

Likes 0

Dislikes 0

Response

Bill Zuretti - Electric Power Supply Association - 5

Answer

Yes

Document Name

Comment

IBR facilities that fall below the revised registration thresholds but are connected to the Bulk Power System (referred to in the SAR as “Non-Material IBRs”) and IBR facilities that are connected to the distribution system (which the SAR refers to as “IBR-DERs”) are subject to Order 901’s directives in ways that are different and distinct from each other. As such, it is appropriate and necessary that these facilities have a clear, specific definition.

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 Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 3

Likes 0

Dislikes 0

Response

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC

Answer

Yes

Document Name

Comment

SPP has collaborated with SRC on developing comments for this SAR. SPP agrees with SRC comments

Likes 0

Dislikes 0

Response

Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3,5 - WECC

Answer

Yes

Document Name

Comment

Yes. Order 901's directives apply differently with respect to (1) BES IBR facilities and Sub-BES IBRs (as defined in the SAR); (2) IBR facilities that fall below the revised registration thresholds but are connected to the Bulk *Power* System (which the SAR refers to as "Non-Material IBRs"); and (3) IBR facilities that are connected to the distribution system (which the SAR mirrors Order 901 in calling "IBR-DERs"). To avoid unnecessary delays, defined terms for all three classes of non-BES IBRs should be developed on an expedited timeframe so that drafting teams working on Milestone 3 and 4 standards can refer to the appropriate classes of IBR facilities clearly and consistently.

It is important to provide some means of ex ante certainty regarding which IBRs fall into each category of facilities. As noted in response to question 2, the categorization of an IBR determines which registered entity—GO/GOP or TO/DP—is responsible for providing data and models of the IBR to grid planners and operators. It is thus vital that a facility's owner/operator, the utility to which it is interconnected, and the Regional Entity be on the same page regarding the status of each IBR.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	
Document Name	
Comment	
Yes, agree.	
Likes 0	

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer

Document Name

Comment

Constellation agrees with NAGF comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

4Provide any additional comments for the drafting team to consider, if desired.

Kimberly Turco - Constellation - 5,6

Answer

Document Name

Comment

Constellation agrees with NAGF comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer

Document Name

Comment

Manitoba Hydro would like to submit the following comment for consideration on the SAR issued between 07/02/24 - 8/20/24 for this project. *Question 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?* - MH response: Yes, the SAR lists the standards that may be applicable following a definition change. Should this list be expanded to include all those with Generator Owner (and Generator Operator) as applicable entities, such as PRC-023-6, PRC-025-2, PRC-026-2, PRC-027-1, PRC-005-6, FAC-001-4, FAC-002-4, and FAC-008-5, and etc.?

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

BPA agrees If FERC (via Order 901) will be requiring the modeling of IBR below the current BES threshold (20 MW individual, 75 MW aggregate) then coming up with clear definitions will be important.

BPA has a few questions:

1. Is there a new threshold for IBR where it is not required to be modeled? For example, does FERC envision the modeling of 1 MW IBRs? How about 500 kW IBRs? Therefore, along with the new definitions there needs to be an establishment of a new lower IBR modeling threshold.
2. For IBR-DER, does the GO/GOP terms apply?
3. Is it typical for a single GO to own a DER? If not, then maybe the IBR-DER is only applicable to the DP?

Finally, BPA feels there needs to be a threshold for when the GO/GOP has to register due to their "Sub-BES IBR". For example, should the GO/GOP have to register if they have a 10 MW Sub-BES IBR? How about a 5 MW or a 2 MW? At some threshold the GO/GOP should not have to register due to the Sub-BES IBR because it is too small and is now considered a Non-Material IBR."

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

Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3,5 - WECC

Answer

Document Name

Comment

Given that there is no longer time for terms developed by this project to be incorporated into the Milestone 2 projects, there is no longer a need to take a phased approach. Instead, all three defined terms should be developed on an expedited basis so that they are available for use by the Milestone 3 drafting teams.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Document Name

Comment

OPG supports NPCC Regional Standards Committee's comments and supports the SAR.

Likes 0

Dislikes 0

Response

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC

Answer

Document Name

Comment

SPP has collaborated with SRC on developing comments for this SAR. SPP agrees with SRC comments

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 3

Likes 0

Dislikes 0

Response

Junji Yamaguchi - Hydro-Quebec (HQ) - 1,5

Answer

Document Name

Comment

Approve this SAR

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

HQ has no comments and supports the SAR.

Likes 0

Dislikes 0

Response

Bill Zuretti - Electric Power Supply Association - 5

Answer

Document Name

Comment

While the definitions contained in the SAR will not be developed in time to be incorporated into Milestone 2 efforts, it is important that this SAR move forward on an expedited basis so that Milestones 3 and 4 can proceed with a more clearly defined and granular set of definitions. This will aid the standards drafting teams, allow the standards development process to move forward on better defined standards, and should also assist in moving the standard through the notice and comment proceeding before FERC. Absent specific definitions as proposed in this SAR, there is a risk that the proposed standard's imprecision hampers the NERC approval process and raises concerns over applicability and compliance among those who need to comply in order to maintain a reliable system

Likes 0

Dislikes 0

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name IRC SRC

Answer

Document Name

Comment

This SAR appears to overlap with the other SAR that has been assigned to this project. To reduce the potential for confusion, the SRC recommends that the two SARs be combined into a single SAR before work begins under either SAR. The SRC also supports the two phases proposed within the SAR.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

The NAGF has no additional comments.

Likes 0

Dislikes 0

Response

Rebecca Baldwin - Transmission Access Policy Study Group - NA - Not Applicable - NA - Not Applicable

Answer

Document Name

Comment

Given that there is no longer time for terms developed by this project to be incorporated into the Milestone 2 projects, there is no longer a need to take a phased approach. Instead, all three defined terms should be developed on an expedited basis so that they are available for use by the Milestone 3 drafting teams.

We do not anticipate that the majority of the work proposed in the SAR will prove controversial, given that the general parameters of the three categories to be defined are established by Order 901, and that FERC has already approved the thresholds for Sub-BES IBRs in its order accepting

NERC’s revisions to the Statement of Compliance Registry Criteria. However, in order to define “Non-Material” (BPS-connected) IBRs and “IBR-DERs,” the SDT will need to determine a reasonable proxy for the boundary between the BPS and the distribution system. Because the definition of the Bulk Power System—a statutory term that is relevant to the limits of FERC’s and NERC’s reliability jurisdiction—is significantly less granular than the NERC-developed definition of the Bulk *Electric* System, it may be challenging to draw this boundary. As with the remainder of the work proposed in this SAR, however, defining the boundary between Non-Material IBRs and IBR-DERs cannot be avoided: if the Project 2024-01 SDT were to refrain from doing so, the Milestone 3 SDTs would instead need to set a boundary on a piecemeal basis, because data and models of IBR-DERs may be provided “in the aggregate,” whereas data and models of Non-Material IBRs may not be aggregated. The SDT may be able to minimize the potential for controversy by (1) using the same 60 kV boundary as the Category 2 GO/GOP and Sub-BES IBR definitions, because FERC has accepted that boundary as satisfying its 2022 directive to “register owners and operators of IBRs *that are connected to the Bulk-Power System*” (*Registration of Inverter-Based Resources*, 181 FERC ¶ 61,124 P 1 (2022) (emphasis added)), and (2) indicating clearly that the 60 kV threshold is merely a proxy for the lower limit of the BPS, and that FERC is the ultimate authority regarding the BPS/local distribution boundary. See *N. Am. Elec. Reliability Corp.*, Order Approving Revisions to North American Electric Reliability Corporation Rules of Procedure and Requiring Compliance Filing, 187 FERC ¶ 61,196 P 54 & n.127 (2024).

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

Document Name

Comment

NPCC RSC supports the Project.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

BPS connected IBRs that will fall under the Category 2 GO/GOP registrations should be called Category 2 IBRs (CAT2-IBR) to align with the registrations. This would make it very clear that these are the IBRs that relate to the Category 2 GO/GOP registrations.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

In addition, FirstEnergy finds this process of inserting sub-transmission IBRs into the Reliability Standards needs to be more transparent and geared toward the adopted practice of definition and standard development. The objective of the previously adopted standards may potentially expand beyond their original intent of providing protection toward the grid.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

AZPS has no additional comments at this time.

Likes 0

Dislikes 0

Response

Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group

Answer

Document Name

[2024-01_Unofficial_Comment_Form IBR SAR_updated_081524.docx](#)

Comment

SAR Scope includes updating GO and GOP Glossary terms. From SAR:

Accordingly, the SDT must consider the impact of the expansion of the GO and GOP definitions on each existing standard that applies to GO and/or GOP, and must propose an implementation plan appropriate in light of those impacts. If the SDT determines that the expansion of the definitions of GO and/or GOP would inappropriately expand the applicability of a particular standard, the SDT should propose changes to the standard(s) at issue or, if the standard at issue is being revised by another drafting team in compliance with Order 901, should publicly notify the applicable SDT of its recommendation and account in its implementation plan for the time needed for such additional standards revisions.

Also of note:

In order to comply with Order 901's differing directives regarding Non-Material (BPS-connected) IBRs and IBR-DERs, the SDT will need to attempt to distinguish between "BPS-connected" and "distribution connected" IBRs. Consistent with the Category 2 GO/GOP registration thresholds, 60 kV may be a reasonable place to draw the line. But because "Bulk Power System" and "local distribution" are both statutory terms affecting FERC's jurisdiction, it will likely be necessary to account for the possibility of case-by-case jurisdictional determinations by FERC, similar to FERC "local distribution" determinations in the context of the BES definition.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

No other comments.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer

Document Name

Comment

The rationale behind the selection of the standards listed under “Standards Affected” by this project is not clear. This SAR scope is to update the Glossary definitions of GO and GOP, add owners and operators for Sub-BES IBRs, and then develop Glossary definitions for Non-Material IBRs and IBR-DERs. Therefore, should this list be expanded to include all NERC standards applicable to Generator Owner (and Generator Operator)?

Likes 0

Dislikes 0

Response