Unofficial Comment Form

Project 2021-01 Modifications to MOD-025 and PRC-019  
Standard Authorization Request (SAR)

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on the **Project 2021-01 Modifications to MOD-025 and PRC-019 SAR** by **8:00 p.m. Eastern, Friday, June 28, 2024.   
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project_2021-01_Modifications_to_MOD-025_and_PRC-019.aspx). If you have questions, contact Standard Developer, [Josh Blume](mailto:Josh.Blume@nerc.net) (via email), or at 470-755-0346.

## Background Information

The PPMVTF developed this project to revise MOD-025-2 to address issues regarding verification and data reporting of generator active and reactive power capability. As stated in the original SAR, implementation of the standard has rarely produced data that is suitable for planning models. The current MOD-025-2 verification testing activities require significant time, expertise, and coordination; however, they do not result in data that should be used by planners for modeling purposes. The project aims to retain testing activities are useful and focus on more effective means of collecting useful data for planning models. The Reliability, Security, and Technology Committee endorsed the SAR on October 19, 2020.

PRC-019-2 addresses the reliability issue of miscoordination between generator capability, control systems, and protection functions. However, PRC-019-2 was developed with a bias toward synchronous generation and does not sufficiently outline the requirements for all generation resource types. The proposed project aims to address a number of issues identified by the System Protection and Control Subcommittee and revise the standard to be inclusive of all types of generation resources. The SAR was endorsed by the NERC Planning Committee on March 4, 2020.

The MOD-025-2 and PRC-019-2 SARs were accepted and authorized for informal posting at the January 20, 2021 SC meeting.

The Federal Energy Regulatory Commission (FERC) Order No. 901 – Milestone 3, Part 3: IBR Modeling Revisions SAR does not directly address regulatory directives from NERC Standards Development Work Plan to respond to FERC Order No. 901. The additional SAR is intended to modify Reliability Standards within the scope of current Project 2021-01 Modifications to MOD-025 and PRC-019 to ensure that obligations to conduct model validation for IBR are not duplicative in nature or create competing expectations for IBR to conduct verification/validation of model data for IBR. As revisions to address model validation and improving quality will be fully addressed by the drafting team assigned to this SAR, it requires an adjustment of scope to remove IBR from the applicability of affected Reliability Standards.

**This project has been identified as higher priority at this time**. This project has a FERC deadline under Milestone 3 of November 4, 2025.

## Questions

1. Are there any areas of concern that duplicative coverage or competing expectations would occur, if so, what are these areas the team should be aware of when drafting?

Yes

No

Comments:

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

Yes

No

Comments: