

Comment Report

Project Name: 2021-01 System Model Validation with IBRs | Draft 2
Comment Period Start Date: 8/8/2025
Comment Period End Date: 9/10/2025
Associated Ballots: 2021-01 System Model Validation with IBRs Implementation Plan AB 2 OT
2021-01 System Model Validation with IBRs MOD-033-3 AB 2 ST

There were 44 sets of responses, including comments from approximately 90 different people from approximately 64 companies representing 7 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree with the changes made to Requirement R1? If not, please provide the basis for your disagreement and any proposed revisions.
2. Do you agree with the proposed Implementation Plan? If not, please provide the basis for your disagreement and your proposed revisions.
3. Do you agree with the changes made to the Technical Rationale? If not, please provide the basis for your disagreement and any proposed revisions.
4. Do you agree that MOD-033-3 is cost effective to address the Directives in the FERC Order? If you do not agree, or if you agree but have suggestions for improvement to enable more cost-effective approaches, please provide your recommendation and, if appropriate, technical, or procedural justification.
5. Please 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
					George Brown	Pattern Operators LP	5	MRO
					Amy Key	MidAmerican Energy Company (MEC)	1	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
					Angela Wheat	Southwestern Power Administration	1	MRO
					Joshua Phillips	Southwest Power Pool	2	MRO
					Patrick Tuttle	Oklahoma Municipal Power Authority	4,5	MRO
					Hayden Maples	Evergy	1,3,5,6	MRO
					Kirsten Rowley	MISO	2	MRO
Andrew Coffelt	Kansas City Board of Public Utilities	1,3,5,6	MRO					
Exelon	Daniel Gacek	1		Exelon	Daniel Gacek	Exelon	1	RF

					Kinte Whitehead	Exelon	3	RF
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					John Nierenberg	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,NPCC,RF,SERC,Texas RE,WECC	ACES Collaborators	James Shultz	Hoosier Energy Electric Cooperative	1	RF
					Jason Procniar	Buckeye Power, Inc.	4	RF
					Nick Fogleman	Prairie Power, Inc.	1,3	SERC
					DJ Stone	North Carolina Electric Membership Corporation	3,4,5	SERC
					Kelly Heims	Central Iowa Power Cooperative	1	MRO
					Andrew Anderson	Wolverine Power Supply Cooperative, Inc.	1	MRO
Black Hills Corporation	Josh Schumacher	6		Black Hills Corporation Segments 1, 3, 5, 6	Trevor Rombough	Black Hills Corporation	1	WECC
					Josh Combs	Black Hills Corporation	3	WECC
					Sheila Suurmeier	Black Hills Corporation	5	WECC
					Josh Schumacher	Black Hills Corporation	6	WECC

Southwest Power Pool, Inc. (RTO)	Joshua Phillips	2		SRC Joint Comments	Joshua Phillips	Southwest Power Pool	2	MRO
					Elizabeth Davis	PJM	2	RF
					John Pearson	ISO New England, Inc.	2	RF
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
					Jamie Johnson	CAISO	2	WECC
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		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
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
					Leslie Burke	Southern Company - Southern	5	SERC

					Company Generation		
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1. Do you agree with the changes made to Requirement R1? If not, please provide the basis for your disagreement and any proposed revisions.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer No

Document Name

Comment

Until clarification is made on the intent of Category 2 IBRs for MOD-032-2, FirstEnergy cannot support the intent of MOD-033-2 Requirement 1.

Likes 0

Dislikes 0

Response

Kelly Heims - Central Iowa Power Cooperative - 1

Answer No

Document Name

Comment

Central Iowa Power Cooperative supports the comments submitted by ACES.

Likes 0

Dislikes 0

Response

Mia Wilson - Mia Wilson On Behalf of: Joshua Phillips, Southwest Power Pool, Inc. (RTO), 2; - Mia Wilson

Answer No

Document Name

Comment

SPP supports the comments submitted by ISO/RTO Council (IRC) Standards Review Committee (SRC).

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer No

Document Name

Comment

ACES agrees with the changes made to R1; however, ACES suggests that footnote 1 does not provide enough clarity around the PC's flexibility to include aggregate DERs and unregistered IBRs. Presently, footnote 1 reads:

“Such planning System models will thus include IBRs and aggregated DERs, as well as IBRs that are not DERs and that do not meet the criteria that would require the owner(s) to register with NERC for mandatory Reliability Standards compliance purposes, that are present in the existing System.”

Alternatively, ACES proposes revising footnote 1 to explicitly say:

“Such planning System models will thus include one or more registered IBRs, aggregated DERs, as well as unregistered IBRs that are not DERs only if their presence is consistent with the system model assembled in MOD-032.”

Likes 0

Dislikes 0

Response

Joshua Phillips - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC Joint Comments

Answer No

Document Name

Comment

The following comment was previously submitted, but the drafting team did not appear to address this comment in either the consideration of comments document or the MOD-033-3 revisions.

The SRC supports the 24-month timeframe in Part 1.2, but is concerned that the clause “using a dynamic local event that occurs within 24 calendar months of the last dynamic local event used in comparison” does not incentivize selection of a good event or the most relevant event to analyze. Rather, it incentivizes selection of events that occur towards the end of the 24-calendar-month period to avoid accelerating the schedule for selecting the next event. The SRC believes the intent of Part 1.2 is to establish a two-year window in which an event should be selected.

Modifying Requirement R1, Part 1.2 to read as follows would eliminate the incentive to select events based on when they occur and would avoid penalizing entities that select more useful or relevant events for comparison even if those events occur soon after the previous event.

1.2. Comparison of the dynamic local event simulation performance of the dynamic planning System model to actual System behavior, represented by Real-time data sources such as Disturbance data recording(s), at least once every two calendar years (at least one dynamic local event shall be selected for each two-calendar-year period) and completing each comparison within 24 calendar months of the dynamic local event. If no dynamic local event occurs within this two-calendar-year period, use the next dynamic local event that occurs.

The added phrase "including those for generating facilities in the planning System model" should be removed from Requirement R1, Part 1.3. The existing wording in Parts 1.1 and 1.2 already requires comparisons involving the planning System model, which implicitly includes generating facilities (based on the NERC Glossary definition of System and the Requirement R1 reference to MOD-032). Retaining this phrase adds no benefit and creates a risk of the requirement being misinterpreted, particularly since the term "generating facilities" is undefined and could raise unnecessary questions. Adding this extra phrase only to Part 1.3 creates inconsistency within Requirement R1 and may suggest an unintended special scope for generating facilities or an intent to exclude generating facilities from other portions of Requirement R1 or MOD-033-3.

MISO and AESO abstain from these comments

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

No

Document Name

Comment

Tri-State has an issue with the language in R1.2.

“(using a dynamic local event that occurs within 24 calendar months of the last dynamic local event used in comparison)”

The problem is we as Planners aren’t going to do this any more frequently than required (every 24 months), but dynamic events are unpredictable. Let’s say I always start this study on Jan 1st of even years (’24, ’26, etc.) with an objective of getting the report done by July 1st of that same year. But since I don’t have control over the dynamic events, I select events that occur every ~18 months since the last event, I will run into the following ‘time-slippage’ issue:

	Study Start Date	Study Finalized Date	Dynamic Event Date	Time between Event and Study Start
1	01/01/2024	07/01/2024	01/01/2023	12 Months
2	01/01/2026	07/01/2026	07/01/2024	18 Months
3	01/01/2028	07/01/2028	01/01/2026	24 Months
4	01/01/2030	07/01/2030	07/01/2027	30 Months
5	01/01/2032	07/01/2032	01/01/2029	36 Months

Over time, this ‘time-slippage’ will accumulate to the point where the events being assessed would have happened years ago. It’s Tri-State’s position that MOD-033 is meant to assess the model accuracy as the system is today (or near today) and not what the model accuracy was half a decade ago.

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 ISO/RTO Council (IRC) Standards Review Committee (SRC) and adopts them as its own.

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

BPA believes the inclusion of the footnote for R1 would be better suited to reference the technical rationale. BPA recommends the technical rationale be revised to cover the intent of the drafting team as it pertains to its reference regarding MOD-032.

Likes 0

Dislikes 0

Response

Brian Lindsey - Entergy - 1

Answer Yes

Document Name

Comment

Abstain, since this requirement does not apply to the TOP.

Likes 0

Dislikes 0

Response

Randy Peters - Manitoba Hydro - 1,3,5,6 - MRO

Answer Yes

Document Name

Comment

The clarifications to Requirement R1 enhance readability and align with the new "Model Validation" glossary term. Referencing MOD-032 and specifying "planning system models" helps clarify scope and promote consistent interpretation.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Josh Schumacher - Black Hills Corporation - 6, Group Name Black Hills Corporation Segments 1, 3, 5, 6

Answer Yes

Document Name

Comment

Black Hills Corporation supports the changes made to Requirement R1.

Likes 0

Dislikes 0

Response

Robert Jones - Seattle City Light - 4

Answer	Yes
Document Name	
Comment	
SCL supports Western Power Pool's comments.	
Likes 0	
Dislikes 0	
Response	
Carver Powers - Utility Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
USV agrees with the proposed language. However, USV would like the DT to consider the potential for double jeopardy for Planning Coordinators regarding MOD-032. A Planning Coordinator would not be able to accurately validate models if MOD-032 Requirement R1 was not done correctly. Due to this concern, USV would prefer the DT to remove the reference to MOD-032 in Requirement R1 or provide clarification on how double jeopardy will not occur.	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples	
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 1	
Likes 0	
Dislikes 0	
Response	

Daniela Atanasovski - APS - Arizona Public Service Co. - 1**Answer** Yes**Document Name****Comment**

None

Likes 0

Dislikes 0

Response**Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers****Answer** Yes**Document Name****Comment**

Ameren agrees with EEI's comments.

Likes 0

Dislikes 0

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

EEI supports the changes made to Requirement R1.

Likes 0

Dislikes 0

Response**Brooke Jockin - Portland General Electric Co. - 1****Answer** Yes

Document Name	
Comment	
Portland General Electric (PGE) aligns with EEI's comments.	
Likes	0
Dislikes	0
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Southern Company supports the changes made to Requirement R1 with a non-substantive change to recommend for language improvements and clarity.	
Requirement R1 - While the intention of the SDT is clear based upon the standard language, the language around what constitutes a "System" model could be improved to address vague and unclear language that could potentially be misinterpreted. The proposed language below is also more consistent with language utilized in other NERC reliability standards such as TPL-001-5 Requirement R1.	
"Each Planning Coordinator shall implement a documented Model Validation process for planning System models that are developed using data consistent with that provided in accordance with Reliability Standard MOD-032, representing its portion of the existing System,..."	
Likes	1
Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre	
Dislikes	0
Response	
Amy Key - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
MEC supports the comments of the MRO NSRF	
Likes	0
Dislikes	0

Response

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

Answer Yes

Document Name

Comment

The MRO NSRF agrees with modifications to R1 and appreciates returning the clarification about what to do when no local event occurred within 24 months to the requirement language instead of a footnote.

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer Yes

Document Name

Comment

See EEI Comments

Likes 0

Dislikes 0

Response

Stephanie Kenny - Edison International - Southern California Edison Company - 6

Answer Yes

Document Name

Comment

EEI supports the changes made to Requirement R1.

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Gul Khan - Gul Khan On Behalf of: Byron Booker, Oncor Electric Delivery, 1; - Gul Khan

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Bob Cardle - Bob Cardle On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

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

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 10

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Timothy Singh - Timothy Singh On Behalf of: Israel Perez, Salt River Project, 3, 6, 5, 1; Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Matthew Jaramilla, Salt River Project, 3, 6, 5, 1; - Timothy Singh

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Thompson - TXNM Energy - 1,3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1, Group Name Exelon

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Stephen Stafford - Georgia Transmission Corporation - 1 - SERC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Greg Sorenson - ReliabilityFirst - 10 - RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kera Schwartz - Southern Indiana Gas and Electric Co. - 2,3,4 - RF**Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Mike Magruder - Avista - Avista Corporation - 1****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Thomas Breen - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response

Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott

Answer

Document Name

Comment

ITC has no comments to submit

Likes 0

Dislikes 0

Response

2. Do you agree with the proposed Implementation Plan? If not, please provide the basis for your disagreement and your proposed revisions.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer No

Document Name

Comment

Until clarification is made on the intent of Category 2 IBRs for MOD-032-2 and its tie to MOD-033-2, FirstEnergy cannot support the intent of MOD-033-2's Implementation Plan.

Likes 0

Dislikes 0

Response

Mia Wilson - Mia Wilson On Behalf of: Joshua Phillips, Southwest Power Pool, Inc. (RTO), 2; - Mia Wilson

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Stephanie Kenny - Edison International - Southern California Edison Company - 6

Answer Yes

Document Name

Comment

EI supports the Implementation Plan as proposed.

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer	Yes
Document Name	
Comment	
See EEI Comments	
Likes 0	
Dislikes 0	
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	Yes
Document Name	
Comment	
The MRO NSRF appreciates the clarity on the impacts to prior timelines and separation of the various conditions impacting approval timing. The MRO NSRF would suggest one non-substantive change for the timing of approval where it currently states "later of" and should be "latest of" since there are 3 options.	
Likes 0	
Dislikes 0	
Response	
Amy Key - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	Yes
Document Name	
Comment	
MEC supports the comments of the MRO NSRF	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes

Document Name	
Comment	
Southern Company supports the Implementation Plan as proposed.	
Likes 0	
Dislikes 0	
Response	
Brooke Jockin - Portland General Electric Co. - 1	
Answer	Yes
Document Name	
Comment	
Portland General Electric (PGE) aligns with EEI's comments.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports the Implementation Plan as proposed.	
Likes 0	
Dislikes 0	
Response	
Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers	
Answer	Yes
Document Name	
Comment	

Ameren agrees with EEI's comments.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1

Answer

Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples

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 2

Likes 0

Dislikes 0

Response

Robert Jones - Seattle City Light - 4

Answer

Yes

Document Name

Comment

SCL supports Western Power Pool's comments.

Likes 0

Dislikes 0

Response

Josh Schumacher - Black Hills Corporation - 6, Group Name Black Hills Corporation Segments 1, 3, 5, 6

Answer

Yes

Document Name

Comment

Black Hills Corporation supports the Implementation Plan as proposed.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Randy Peters - Manitoba Hydro - 1,3,5,6 - MRO

Answer

Yes

Document Name

Comment

The implementation plan appears reasonable and provides sufficient time for entities to adapt to the clarified requirements. No concerns from a resource or timeline perspective.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Breen - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kera Schwartz - Southern Indiana Gas and Electric Co. - 2,3,4 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joshua Phillips - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC Joint Comments

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Greg Sorenson - ReliabilityFirst - 10 - RF

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Stephen Stafford - Georgia Transmission Corporation - 1 - SERC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1, Group Name Exelon

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott Thompson - TXNM Energy - 1,3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Timothy Singh - Timothy Singh On Behalf of: Israel Perez, Salt River Project, 3, 6, 5, 1; Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Matthew Jaramilla, Salt River Project, 3, 6, 5, 1; - Timothy Singh	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carver Powers - Utility Services, Inc. - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

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	
Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Kelly Heims - Central Iowa Power Cooperative - 1	
Answer	Yes
Document Name	
Comment	
Likes	0

Dislikes 0

Response

Bob Cardle - Bob Cardle On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Lindsey - Entergy - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Gul Khan - Gul Khan On Behalf of: Byron Booker, Oncor Electric Delivery, 1; - Gul Khan

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kevin Conway - Western Power Pool - 4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott	
Answer	
Document Name	
Comment	
ITC has no comments to submit	
Likes 0	
Dislikes 0	
Response	

3. Do you agree with the changes made to the Technical Rationale? If not, please provide the basis for your disagreement and any proposed revisions.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer No

Document Name

Comment

Until clarification is made on the intent of Category 2 IBRs for MOD-032-2, FirstEnergy cannot support the intent of MOD-033-2's Technical Rationale.

Likes 0

Dislikes 0

Response

Mia Wilson - Mia Wilson On Behalf of: Joshua Phillips, Southwest Power Pool, Inc. (RTO), 2; - Mia Wilson

Answer No

Document Name

Comment

SPP supports the comments submitted by ISO/RTO Council (IRC) Standards Review Committee (SRC).

Likes 0

Dislikes 0

Response

Joshua Phillips - Southwest Power Pool, Inc. (RTO) - 2, Group Name SRC Joint Comments

Answer No

Document Name

Comment

The Technical Rationale includes the following statement:

Determining when a dynamic local event might occur may be unpredictable, and because of the analytic complexities involved in simulation, the time parameters in Requirement R1, Part 1.2 specify that the comparison period of "at least once every 24 calendar months" is intended to both provide for at least 24 months between dynamic local events used in the comparisons and....

The language in MOD-033-3 does not align with this portion of the Technical Rationale because Requirement R1, Part 1.2 requires the use of “a dynamic local event that occurs within 24 calendar months of the last dynamic local event used in comparison” and therefore allows no more than (not at least) 24 months between local dynamic events.

MISO and AESO abstain from these comments

Likes 0

Dislikes 0

Response

Thomas Breen - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1

Answer

No

Document Name

Comment

We support the comments from the MRO NSRF and desire that the comments are considered, but feel the standard is sufficient for an affirmative vote.

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

Randy Peters - Manitoba Hydro - 1,3,5,6 - MRO

Answer

Yes

Document Name

Comment

The revised Technical Rationale clearly supports the updated requirements and reinforces that model validation is technology-agnostic—an important point given the rise of IBRs.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Josh Schumacher - Black Hills Corporation - 6, Group Name Black Hills Corporation Segments 1, 3, 5, 6

Answer

Yes

Document Name

Comment

Black Hills Corporation has no suggested changes to the Technical Rationale.

Likes 0

Dislikes 0

Response

Robert Jones - Seattle City Light - 4

Answer

Yes

Document Name

Comment

SCL supports Western Power Pool's comments.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers

Answer Yes

Document Name

Comment

Ameren agrees with EEI's comments.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

EEI has no suggested changes to the Technical Rationale.

Likes 0

Dislikes 0

Response

Brooke Jockin - Portland General Electric Co. - 1

Answer Yes

Document Name

Comment

Portland General Electric (PGE) aligns with EEL's comments.

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

Southern Company has no suggested changes to the Technical Rationale.

Likes 0

Dislikes 0

Response

Greg Sorenson - ReliabilityFirst - 10 - RF

Answer Yes

Document Name

Comment

The Technical Rationale seems appropriate for the purpose of model validation.
The rationale document does a good job advocating for a review of values against values in a tolerance range.
While tempting, it is important to avoid simple "curve fitting", which brings with it a host of unintended consequences. The Technical Rationale does not advocate for changing modeling parameters to exactly match past system behavior. That practice does not take into account the complexity of forecasting load and generation values in future year cases.

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer

Yes

Document Name

Comment

See EEI Comments

Likes 0

Dislikes 0

Response

Stephanie Kenny - Edison International - Southern California Edison Company - 6

Answer

Yes

Document Name

Comment

EEI has no suggested changes to the Technical Rationale.

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Gul Khan - Gul Khan On Behalf of: Byron Booker, Oncor Electric Delivery, 1; - Gul Khan

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Lindsey - Entergy - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Bob Cardle - Bob Cardle On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kelly Heims - Central Iowa Power Cooperative - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

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

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1**Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Carver Powers - Utility Services, Inc. - 4****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Ruida Shu - Northeast Power Coordinating Council - 10****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Hillary Creurer - Allete - Minnesota Power, Inc. - 1****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response

Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Timothy Singh - Timothy Singh On Behalf of: Israel Perez, Salt River Project, 3, 6, 5, 1; Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Matthew Jaramilla, Salt River Project, 3, 6, 5, 1; - Timothy Singh

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Thompson - TXNM Energy - 1,3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1, Group Name Exelon

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Stephen Stafford - Georgia Transmission Corporation - 1 - SERC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kera Schwartz - Southern Indiana Gas and Electric Co. - 2,3,4 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Amy Key - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott	
Answer	
Document Name	
Comment	
ITC has no comments to submit	
Likes 0	
Dislikes 0	
Response	

4. Do you agree that MOD-033-3 is cost effective to address the Directives in the FERC Order? If you do not agree, or if you agree but have suggestions for improvement to enable more cost-effective approaches, please provide your recommendation and, if appropriate, technical, or procedural justification.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer No

Document Name

Comment

Until clarification is made on the intent of Category 2 IBRs for MOD-032-2, FirstEnergy cannot determine the cost effectiveness of implementing MOD-033-2.

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

Southern Company agrees that MOD-033-3 is cost effective to address the Directives in the FERC Order.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Robert Jones - Seattle City Light - 4

Answer Yes

Document Name

Comment

SCL supports Western Power Pool's comments.

Likes 0

Dislikes 0

Response

Randy Peters - Manitoba Hydro - 1,3,5,6 - MRO

Answer Yes

Document Name

Comment

The proposed changes are primarily clarifications and do not introduce new technical burdens. By improving clarity and reducing ambiguity, MOD-033-3 supports cost-effective compliance and implementation.

Likes 0

Dislikes 0

Response

Brian Lindsey - Entergy - 1

Answer Yes

Document Name

Comment

Abstain; unknown if this standard is cost effective to other entities.

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC**Answer** Yes**Document Name****Comment**

BPA agrees non-substantive changes by definition do not represent a burdensome cost increase.

Likes 0

Dislikes 0

Response**Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Nierenberg, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Thomas Breen - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1****Answer** Yes**Document Name**

Comment

Likes 0

Dislikes 0

Response**Amy Key - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Mike Magruder - Avista - Avista Corporation - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Greg Sorenson - ReliabilityFirst - 10 - RF****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Stephen Stafford - Georgia Transmission Corporation - 1 - SERC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Thompson - TXNM Energy - 1,3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Timothy Singh - Timothy Singh On Behalf of: Israel Perez, Salt River Project, 3, 6, 5, 1; Laura Somak, Salt River Project, 3, 6, 5, 1; Mathew Weber, Salt River Project, 3, 6, 5, 1; Matthew Jaramilla, Salt River Project, 3, 6, 5, 1; - Timothy Singh

Answer Yes

Document Name

Comment	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Carver Powers - Utility Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kelly Heims - Central Iowa Power Cooperative - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Gul Khan - Gul Khan On Behalf of: Byron Booker, Oncor Electric Delivery, 1; - Gul Khan

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Kevin Conway - Western Power Pool - 4****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Donna Wood - Tri-State G and T Association, Inc. - 1****Answer****Document Name****Comment**

NA

Likes 0

Dislikes 0

Response**Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott****Answer****Document Name****Comment**

ITC has no comments to submit

Likes 0

Dislikes 0

Response

Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers

Answer

Document Name

Comment

Ameren will not comment on the cost effectiveness of the project.

Likes 0

Dislikes 0

Response

Josh Schumacher - Black Hills Corporation - 6, Group Name Black Hills Corporation Segments 1, 3, 5, 6

Answer

Document Name

Comment

Black Hills Corporation will not comment on cost effectiveness.

Likes 0

Dislikes 0

Response

Bob Cardle - Bob Cardle On Behalf of: Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle

Answer

Document Name

Comment

PGAE will not comment on cost-effectiveness.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Duke Energy's focus is on BES Reliability and will not address cost-effectiveness.

Likes 0

Dislikes 0

Response

5. Please provide any additional comments for the drafting team to consider, if desired.

Kevin Conway - Western Power Pool - 4

Answer

Document Name

Comment

We appreciate the time and effort put in by the Drafting Team on this project and commend them for finding the best resolution for addressing the FERC 901 directive.

Likes 0

Dislikes 0

Response

Brian Lindsey - Entergy - 1

Answer

Document Name

Comment

Abstain responses to Question 1 due to R1 does not apply to TOP and Question 4 due to unknown if this standard is cost effective to other entities.

Likes 0

Dislikes 0

Response

Randy Peters - Manitoba Hydro - 1,3,5,6 - MRO

Answer

Document Name

Comment

We appreciate the drafting team's effort to enhance clarity without introducing unnecessary complexity. The alignment with existing standards and definitions helps streamline compliance and supports consistent validation practices across the industry.

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

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Document Name

Comment

No additional comments.

Note - our comments tied to Project 2022-02 concerning scope of Unregistered IBRs related to inclusion of GO/GOP Category 2's definition in MOD-032-2.

Likes 0

Dislikes 0

Response

Kelly Heims - Central Iowa Power Cooperative - 1

Answer

Document Name

Comment

Central Iowa Power Cooperative supports the comments submitted by ACES.

Likes 0

Dislikes 0

Response

Jennifer Weber - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Document Name

Comment

It may be more reasonable for the Planning Coordinator to require various data from 'unregistered IBR's' through existing interconnection requirements than to require that all unregistered IBR's provide this data to the PC. The TP and PC could determine what level of unregistered IBR's could have a material impact on their systems and work directly with those unregistered entities.

It would be untenable to require a Planning Coordinator to obtain and study each "generator or energy storage technology connected to a distribution system that is capable of providing Real Power in a non-isolated parallel operation with the BPS, including those connected behind the meter of an end-use customer that is supplied from a distribution system. (DER)". It's also very likely that Distribution Providers would not know the full extent of the number of these systems, much less the dynamics modeling data being requested.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE requests the drafting team consider including examples of acceptable evidence in R2/M2:

M2. Acceptable evidence may include, but is not limited to, a copy of the dated communication(s) (for example email notices or postal receipts showing recipient and date that it has distributed the requested data or written response that it does not have the data) in accordance with Requirement R2.

Likes 0

Dislikes 0

Response

Robert Jones - Seattle City Light - 4

Answer

Document Name

Comment

SCL supports Western Power Pool's comments.

Likes 0

Dislikes 0

Response**Ruida Shu - Northeast Power Coordinating Council - 10****Answer****Document Name****Comment**

The Reliability Standards Committee (RSC) of NPCC supports the proposed draft standard.

Likes 0

Dislikes 0

Response**Hayden Maples - Hayden Maples On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Hayden Maples****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 5

Likes 0

Dislikes 0

Response**Daniela Atanasovski - APS - Arizona Public Service Co. - 1****Answer****Document Name****Comment**

None

Likes 0

Dislikes 0

Response

Chris Shultz - Seattle City Light - 5

Answer

Document Name

Comment

Support Western Power Pool Comments

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Document Name

Comment

No additional comments.

Likes 0

Dislikes 0

Response

Brooke Jockin - Portland General Electric Co. - 1

Answer

Document Name

Comment

Portland General Electric (PGE) aligns with EEI's comments.

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer

Document Name

Comment

Thank you for the opportunity to comment

Likes 0

Dislikes 0

Response

Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott

Answer

Document Name

Comment

ITC has no comments to submit

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

Document Name

Comment

NA

Likes 0

Dislikes 0

Response

Amy Key - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3

Answer

Document Name

Comment

MEC supports the comments of the MRO NSRF

Likes 0

Dislikes 0

Response

Thomas Breen - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1

Answer

Document Name

Comment

We support the comments from the MRO NSRF and desire that the comments are considered, but feel the standard is sufficient for an affirmative vote.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

The MRO NSRF appreciates the responsiveness to prior comments on this standard.

Likes 0

Dislikes 0

Response