Unofficial Comment Form

Project 2022-02 Uniform Modeling Framework for IBR

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project** **2022-02 Uniform Modeling Framework for IBR** by **8 p.m. Eastern, Thursday, October 10, 2024.**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project2022-02ModificationstoTPL-001-5-1andMOD-032-1.aspx). If you have questions, contact Senior Standards Developer, [Laura Anderson](mailto:laura.anderson@nerc.net) (via email), or at 404-782-1870.

## Background Information

Prior to FERC Order No. 901, Project 2022-02 was intended to address multiple Standard Authorization Requests (SARs) related to transmission planning and modeling data and analysis (MOD-032-1 Data for Power System Modeling and Analysis SAR from the NERC System Planning Impacts by the Distributed Energy Resources Working Group (SPIDERWG); TPL-001-5.1 Transmission System Planning Performance Requirements SAR from NERC Inverter-Based Resource Performance Working Group (IRPWG); and TPL-001-5.1 Transmission System Planning Performance Requirements SAR from the SPIDERWG).

The Project 2022-02 Drafting Team (DT) decided to break this project into two phases since there are two Reliability Standards involved and the project scopes are quite different. Phase I addresses MOD-032-1 in data collection and Phase II was intended to address TPL-001-5.1 in the accuracy of transmission system planning assessments. **This posting affects Phase I of the project for proposed Reliability Standard MOD-032-2 and does not contemplate the SAR related to FERC Order No. 901; the Milestone 3, Part 1 posted for industry comments May 17 – June 24, 2024.**

***Draft 3 relationship to FERC Order No. 901***

Around the time that Draft 3 of proposed Reliability Standard MOD-032-2 was prepared, NERC incorporated FERC Order No. 901, Milestone 3, Part 1 into the current Project 2022-02, expanding the scope of this project to include a uniform modeling framework for IBR and elevating the project to high priority. Given that the DT already modified Draft 3 of proposed Reliability Standard MOD-032-2 in response to Industry comments, and that industry need for DER data exchange continues to exist, this Draft 3 of proposed Reliability Standard MOD-032-2 is being posted for a 45-day comment period with 10-day ballot.

Additional changes to MOD-032 may be needed based on the proposed SAR resulting from FERC Order No. 901, Milestone 3, Part 1 and will be considered as part of the Project 2022-02 workplan once the SAR and workplan have been finalized.

***Proposed Distributed Energy Resources (DER) definition changes***

As included in the SAR, a DER definition is proposed that is suitable for application across NERC standards (i.e., definition is not specific to MOD-032). Based on industry comment, the DT suggested redlines to clarify that DER includes behind-the-meter resources. Further, the DT proposed a clarification to the term "Distribution Provider" (DP) to point to the NERC Glossary of Terms definition more clearly, rather than the NERC registration criteria. The Technical Rationale has additional information on the proposed DER definition.

***"Pass through" requirement removed***

The previous Footnotes 4 and 5 were consolidated to remove any “pass through” requirement and to clarify that the DP is the responsible entity for reporting DER data under currently available entity registration, while recognizing that DER data collection efforts may generally involve DP and Transmission Owner (TO) coordination.

## Questions

1. Given the explanation in the Technical Rationale and responses to industry comments, do you agree with the proposed definition for DER? If you do not agree, please suggest modifications to improve the definition.

Yes

No

Comments:

1. Do you agree that the modifications for the proposed reliability standard address the scope of the SAR, modifications to MOD-032-1, in a cost-effective manner? If you do not agree, please provide alternatives that would address the SAR scope in a more cost-effective manner.

Yes

No

Comments:

1. Given the explanation added in the Implementation Plan and in response to industry comments, do you agree with the Implementation Plan for proposed Reliability Standard MOD-032-2?

Yes

No

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

Comments: