

Comment Report

Project Name:	2022-02 Uniform Modeling Framework for IBR Draft 2
Comment Period Start Date:	8/8/2025
Comment Period End Date:	9/10/2025
Associated Ballots:	2022-02 Uniform Modeling Framework for IBR Draft 1 Implementation Plan AB 2 OT 2022-02 Uniform Modeling Framework for IBR Draft 1 IRO-010-6 Non-binding Poll AB 2 NB 2022-02 Uniform Modeling Framework for IBR Draft 1 IRO-010-6 AB 2 ST 2022-02 Uniform Modeling Framework for IBR Draft 1 MOD-032-2 Non-binding Poll AB 2 NB 2022-02 Uniform Modeling Framework for IBR Draft 1 MOD-032-2 AB 2 ST 2022-02 Uniform Modeling Framework for IBR Draft 1 TOP-003-8 Non-binding Poll AB 2 NB 2022-02 Uniform Modeling Framework for IBR Draft 1 TOP-003-8 AB 2 ST

There were 68 sets of responses, including comments from approximately 153 different people from approximately 103 companies representing 8 of the Industry Segments as shown in the table on the following pages.

Questions

- 1. Do you agree with the proposed MOD-032-2 modifications? If you do not support the modifications made, please provide rationale and proposed language on how you would address the FERC Order 901 directives.**
- 2. Do you agree with the proposed IRO-010-6 and TOP-003-8 modifications? If you do not support the modifications made, please provide rationale and proposed language on how you would address the FERC Order 901 directives.**
- 3. Do you agree that the modifications for the proposed reliability standards (MOD-032-2, IRO-010-6, and TOP-003-8) address the scope of the standard authorization request (SAR) 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.**
- 4. Do you agree with the proposed ERO Unacceptable Models List? If you do not agree, please provide alternative language and explain the rationale that, if made, would result in your support.**
- 5. 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
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
Adrian Harris	Adrian Harris		MRO,RF,SERC	RTO/ISO Council Standard Review Committee	Elizabeth Davis	PJM	2	RF
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Adrian Harris	MISO	2	RF
					Helen Lainis	Independent Electricity System Operator	2	NPCC
					Joshua Phillips	SPP	2	MRO
					Ali Miremadi	CAISO	2	WECC
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	1	MRO

						Company (MEC)		
						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
Con Ed - Consolidated Edison Co. of New York	Dermot Smyth	1	NPCC	Con Edison	Dermot Smyth	Con Edison Company of New York	1,3,5,6	NPCC
					Edward Bedder	Orange & Rockland		NPCC
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 Procuniar	Buckeye Power, Inc.	4	RF
					Kelly Heims	Central Iowa Power Cooperative	1	MRO
					Nick Fogleman	Prairie Power, Inc.	1,3	SERC
					DJ Stone	North Carolina Electric Membership Corporation	3,4,5	SERC
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
Eversource Energy	Joshua London	1,3		Eversource	Joshua London	Eversource Energy	1	NPCC
					Vicki O'Leary	Eversource Energy	3	NPCC
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 Company Generation	5	SERC
Northeast Power Coordinating Council	Ruida Shu	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

Salvatore Spagnolo	New York Power Authority	1	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
Sean Cavote	PSEG	4	NPCC
Jason Chandler	Con Edison	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
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
Emma Halilovic	Hydro One	1,3	NPCC
Philip Nichols	National Grid	1	NPCC
Emma Halilovic	Hydro One	1,3	NPCC

					Caver Powers	Utility Services	5	NPCC
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1. Do you agree with the proposed MOD-032-2 modifications? If you do not support the modifications made, please provide rationale and proposed language on how you would address the FERC Order 901 directives.

Thomas Foltz - AEP - 5

Answer No

Document Name

Comment

The SDT's response to AEP's previous comments states that "Attachment 1 does not create obligations for entities to provide data, but specifies the data items that need to be covered by the PC/TP data reporting procedures and requirements." While this is true, a compliance obligation nonetheless remains on the PC/TP to document data reporting requirements that address or cover the items in Attachment 1. We maintain that the items as given in 7a and 10a of the Dynamics column are too all-encompassing for positive sequence modeling, particularly "momentary cessation" and "ride-through," so the recommendations made in our previously submitted comments remain the same. While there are provisions for representing voltage and frequency protection settings in positive sequence simulations, "momentary cessation, tripping, and ride-through" are too open-ended, and may not be able to be represented completely in positive sequence phasor domain simulations, and lack the clarity needed to be certain of compliance. AEP suggests the following be used instead:

7a. "In the absence of project specific data, include estimated, assumed, or typical voltage and frequency protection settings."

10a. "Include estimated, assumed, or typical aggregate voltage and frequency protection settings."

The SDT's response also stated that they "received an overwhelming response from industry stating that there are different functional entities who could collect and provide data for DER where there is no associated registered DP between the DER connection point" and that "this could be the Transmission Owner, Distribution Provider, Generator Owner, Balancing Authority, Resource Planner, etc." While AEP appreciates the addition of footnote 7 of Attachment 1 Data Reporting Requirements and the flexibility it provides in allowing aggregate thresholds to be specified, it is difficult to envision GOs, BAs, and RPs as being potentially held responsible for DER aggregation modeling. As stated in our previous comments, FERC Order 2222 DER aggregators would seem to be well-positioned to coordinate with their constituent DERs, consolidate the necessary modeling and planning data, and meet compliance obligations. AEP recommends that consideration be given in pursuing FERC Order 2222 DER aggregators for this purpose.

AEP is concerned that R1.1 allows the PC and TP to determine the entity who is ultimately responsible to obtain each of the required items in Attachment 1. In effect, two Functional Entities are essentially given authority to decide who bears both the responsibility and ultimate risk of obtaining data from entities with no obligations to provide it. Our concern is if the assigned entity is one that neither owns nor operates the equipment, and this possibility is a contributor to our decision to vote negative on MOD-032.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Duke Energy supports the incorporation of the following EEI comment:

...”EEI appreciates the inclusion of the Abeyance Language, however, the language could be clearer and less repetitive. The subjectivity of the language (e.g., sincere intent) should be removed because it places unnecessary compliance risk the functional entities responsible. To resolve our concerns, we offer the following edits in boldface for NERC consideration.”

Duke Energy supports the incorporation of the following EEI edits with one additional time change (see strike-through):

“For a period of two [three] years following the **enforcement** date of Reliability Standard MOD-032-2 Requirement R2 under the associated implementation plan, the CEA will not pursue an action under Sections 4A.0 or 5.0 of Appendix 4C of the Rules of Procedure for a failure to comply with Reliability Standard MOD-032-2 Requirement R2 Part 2.1 with respect to the provision of estimated aggregate DER data or estimated data for **unregistered IBRs. While the CEA will not pursue compliance actions during this period for entities who develop estimates for aggregate DER data and unregistered IBR data that include the supporting data explanation and methods used as detailed in Requirement R2 subpart 2.1, they will pursue actions against entities who do not supply the required estimates, or the explanation of the limits or their methods used to create the estimates provided.** Entities shall participate in any compliance monitoring activities undertaken by the CEA during this potential noncompliance abeyance period and submit documentation as requested.”

Additionally, Duke Energy does not agree with the modifications to IRO-010-6 and TOP-003-8, specifically for requirement R1.5.3 (both standards). MOD-032 and MOD-26 require models, and the PC and TP are required to jointly develop the models without RC or TOP input. Multiple modeling tasks may be required with significant additional cost if all four entities (RC, PC, TP, and TOP) do not coordinate their modeling needs. Therefore, Duke Energy recommends adding RC and TOP coordination language to R1 requirement of MOD-032-2. (Reference: Q1 – NERC Project 2022-02 Comment Form, due 9/10/2025)

Likes1	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre
Dislikes0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	No
Document Name	
Comment	
<p>FirstEnergy offers the following concerns toward the scope of Unregistered IBRs related to inclusion of GO/GOP Category 2’s definition in MOD-032-2.</p> <p>Requirement R2.1. states “Data for an IBR that is not a DER and does not meet the criteria that would require the owner to register with NERC for mandatory Reliability Standards compliance purposes.</p> <p>R2.1. refers to IBRs that do not meet the BES Definition or Generator Owner Category 2 criteria. This requirement brings all IBRs into applicability of the standard regardless of size or interconnectivity.</p> <p>Project 2024-01 passed on May 7, 2025, and adds “Category 2” non-BES IBRs to the Generator Owner definition in the NERC Glossary of Terms. Category 2 IBRs include generation facilities that meet or exceed 20 MVA and are interconnected at or above 60 kV. The intent of Project 2024-01 was to include IBRs that do not meet the BES Definition but have a material impact on the reliability of the BES. Including IBRs that do not have a material impact on the reliability of the BES does not contribute to the reliability of the BES and adds unnecessary work for registered Generator Owners.</p> <p>The reliability standard itself should not define applicability to reliability standards. The BES Definition and Generator Owner category 2 criteria alone should define applicability.</p> <p>In addition, entities that own IBRs that do not meet the BES Definition or Generator Owner Category 2 criteria may not be required to register as a</p>	

Generator Owner and therefore are not held to compliance with the reliability standards. This creates an unfair advantage. FirstEnergy considers it a bad precedent to bring in generation facilities that do not meet the BES Definition or Generator Owner category 2 criteria.

For FirstEnergy offers the following 3rd bullet under R2.1:

“Data for an IBR that is not a DER and meets the criteria for Generator Owner registration under the NERC Glossary of Terms, including Category 2 IBRs as defined in Project 2024-01. Data for IBRs that do not meet these criteria may be requested only if the Planning Coordinator or Transmission Planner determines that such resources have a material impact on the reliability of the BES.”

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

Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 6

Answer No

Document Name

Comment

We do not agree with R2.1; estimating parameters is not appropriate. If additional data is needed, then it should be required for those GO/GOP entities to submit it to the applicable authority.

Likes 0

Dislikes 0

Response

Randy Peters - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	No
Document Name	
Comment	
<p>MH appreciates the SDT 's consideration of our comments in the previous revision of the draft standard. In general, we are OK with the changes made to Requirement R1 of MOD-032-2; however, we would like to propose some wording and format changes to improve the clarity, as indicated below.</p> <p>1.4. Specifications of the following items for dynamic model submissions:</p> <p>1.4.1. The type of dynamic models accepted:</p> <p>standard library models incorporated within the software(s) utilized to create the Interconnection-wide case(s);</p> <p>user-defined models; or</p> <p>both standard library models and user-defined models.</p> <p>1.4.2. Where user-defined models are accepted,</p> <p>1.4.2.1. Usability requirements for any submitted user-defined models, including, at a minimum, requirements to provide model documentation and instructions for model set up and use.</p> <p>1.4.2.2. Each Planning Coordinator and Transmission Planner shall provide their user-defined model requirements within 90 calendar days of receiving a written request for such data from other Planning Coordinators and Transmission Planners within the Interconnection.</p>	
Likes 0	
Dislikes 0	
Response	
Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 5	
Answer	No
Document Name	
Comment	
<p>We do not agree with R2.1; estimating parameters is not appropriate. If additional data is needed, then it should be required for those GO/GOP entities to submit it to the applicable authority.</p>	
Likes 0	
Dislikes 0	
Response	
Dermot Smyth - Con Ed - Consolidated Edison Co. of New York - 1, Group Name Con Edison	

Answer	No
Document Name	
Comment	
We do not agree with R2.1; estimating parameters is not appropriate. If additional data is needed, then it should be required for those GO/GOP entities to submit it to the applicable authority.	
Likes 0	
Dislikes 0	
Response	
Brian Lindsey - Entergy - 1	
Answer	No
Document Name	
Comment	
Attachment 1, Footnote 3 effectively requires that all DERs are modeled, despite Footnote 7 allowing the procedure developed per R1 to define aggregation thresholds for DERs. Footnote 3 should instead read “For purposes of this item, aggregate Demand at each bus under item 1 is the Demand aggregated at the bus after removing any offsets due to DERs modeled at that bus according to the data requirements and reporting procedures developed by the PC and TPs per R1.”	
Likes 0	
Dislikes 0	
Response	
Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	
Comment	
<p>LG&E/KU does not support the revisions to MOD-032 due to the introduction of ambiguous compliance scenarios that are likely to arise from the revisions. The modifications to Requirement R1 Part 1.1 requiring the Transmission Planner (TP) to identify the entity responsible for providing data for all items in Attachment 1: (1) exceeded the scope of changes necessary to address FERC Order 901 directives, (2) removed certainty for functional entities regarding their obligations, and (3) failed to address FERC’s explicit directive “to determine the appropriate registered entity responsible for providing data of IBR-DERs that in the aggregate have a material impact on the Bulk-Power System.” In regard to point 3, it should be noted that the revised MOD-032 standard not only hands off the assignment of a responsible entity to TPs, it also fails to require that such entities be “registered entities.”</p> <p>The formerly described issues aside, the revisions to MOD-032 have the potential to put TPs in a spot where compliance with the standard is unclear. If a TP assigns an unregistered entity responsibility for providing DER data under Requirement R1 Part 1.1, and the unregistered entity fails to provide</p>	

data (or estimated data), it is not clear who is in violation. The TP has correctly performed its job under Requirement R1 Part 1.1, but the unregistered entity is not subject to NERC standards. The standard does not explicitly give the TP the right to provide its own estimate in these cases, nor does it say that the TP must assume the compliance burden on behalf of the unregistered entities. Ultimately, whether the TP supplements their own estimate or proceeds with no DER data, they venture into territory with unknown compliance repercussions.

Suggesting that TPs have other means to enforce compliance, such as stakeholder processes, is unsatisfactory. If this were always the case, compliance enforcement authorities would be redundant. LG&E/KU suggests that entities with sufficiently regulated processes that provide a reliable means of obtaining data from entities unregistered with NERC could be granted a regional variation of the standard. However, LG&E/KU maintains that the base NERC standard should be unambiguous on who provides data and that, in the case of DER connected to unregistered entities, NERC must select a registered, functional entity to bear the compliance burden. LG&E/KU suggests striking modifications to Requirement R1 Part 1.1 and all associated changes.

As an alternative means of addressing the FERC Order 901 directives, LG&E/KU suggests either (1) that the Transmission Owner (TO) bear the responsibility for the data associated with unregistered IBRs and DERs connected to unregistered distribution providers, or (2) that the TO bear the responsibility for data associated with unregistered IBRs, and that the TP be responsible only for estimating the data associated with DERs connected to unregistered distribution providers (i.e., direct estimation rather than mandatory attempted data collection and subsequent estimation). For both options, registered Distribution Providers (DPs) should bear the responsibility for data associated with DERs connected to their systems. These options (1) do not make edits outside of the necessary scope to address FERC Order 901 directives, (2) preserve clarity of compliance obligations for functional entities, and (3) address FERC's explicit directive to determine the appropriate registered entity for providing data for DERs connected to unregistered distribution providers.

Likes 0

Dislikes 0

Response

Isidoro Behar - Long Island Power Authority - 1

Answer

No

Document Name

Comment

As written, MOD-032-2, MOD-33, and MOD-026 reviews should be coordinated simultaneously to prevent potential conflicts and/or contradictory requirements. R2.1 should include a new measure that requires to provide evidence of estimation methods, assumptions, etc., for estimated data. As for the ERO Unacceptable Model List process, a decision-making window should be considered to not hamper case builds, and the process should coincide with interconnection case build cycles to streamline compliance.

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

No

Document Name

Comment	
SRP Supports the comments submitted by AEP related to the use of an unacceptable model in R2. The submission of an unapproved model should not be acceptable. The focus should be on unregistered IBRs as mentioned by other participants.	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1	
Answer	No
Document Name	
Comment	
<p>The proposed MOD-032-2 modifications contain inconsistencies to the term used throughout the standard (i.e.: “entity responsible”. “functional entity”, and “entity”). The only term defined is “functional entity” within Footnote 2. The inconsistency in language is confusing. The references need to be consistent throughout the document. The standard needs to clearly state who is responsible for the evidence required for Compliance. If a single designation is not possible, make clear that the PC and TP shall designated who is responsible in R1.1 and be consistent with the language throughout the Standard.</p> <p>Requirement R2: Registered Tos and DP do not have the ability to provide or collect DER data from unregistered distribution providers. If this data is critical to the reliability of the BPS, then those unregistered distribution providers that have interconnecte4d DER that have a material impact on the BPS should be registered through NER registration criteria and added under 4.1 as a functional entity. We suggest the following language:</p> <p style="padding-left: 40px;">Distribution Providers (DPs) shall provide aggregate Distributed Energy Resource (DER) data for DERs that have been identified by the responsible PC and TP to have a material impact on the BPS. The DP shall estimate the modeling data and parameters and include an explanation of the limitations of the availability of data, and explanation of the limitations of the data provided, and the method used for estimation.</p> <p>Requirement R3: There doesn’t seem to be a mechanism that a PC or TP can use to compel the model provider to submit a model or data that is acceptable. There is a 90-day response period that could end as an end-less loop if the TP doesn’t accept that the explanation where the technical basis doesn’t respond to the technical concerns.</p>	
Likes 0	
Dislikes 0	
Response	
Steven Taddeucci - NiSource - Northern Indiana Public Service Co. - 3	
Answer	No
Document Name	
Comment	

NIPSCO supports the comments made by AEP.

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

The DT's Consideration of FERC Order 901 Directives said the following: “ the DT did not know how to interpret **material affect** and therefore, left it up to the Planning Coordinator (PC) and each of its Transmission Planners (TP) to review, consider, and determine all unregistered IBR that would be materially impacted.”

ACES asserts that the drafting team (DT) remains well within the scope of the directive in establishing a threshold to define “**material affect**” and suggests revising R2.1 as follows:

R2.1 – Each PC/TP shall, at their discretion, require R1 data from functional entities with 20 MVA or greater in total IBR-DER generation within their service territory.

R2.1.1 – For each functional entity with 20 MVA or greater in total IBR-DER generation within their service territory, the entity shall provide R1 data for individual IBR-DER units with a nameplate rating greater than or equal to 5 MVA.

Rationale for 20 MVA Threshold

Historical Precedent

- The 20 MVA threshold has historically served as a continent-wide bright-line criterion distinguishing facilities that materially affect Bulk Power System (BPS) reliability from those that do not.
- This threshold is further supported by its use in defining Category 2 GO/GOP IBRs.

Consistency Across Resource Types

- Fossil fuel generation units under 20 MVA are not required to provide this modeling data. Requiring non-BES IBR-DER data below this threshold would create an inconsistent and potentially inequitable standard.

Avoiding Regional Discrepancies

- Without a DT-defined threshold, PCs/TPs will inevitably apply varying criteria.
- Entities operating in multiple PC/TP areas could face inconsistent and burdensome reporting requirements.

Improved Data Quality and Model Accuracy

- Setting the threshold at 20 MVA total, with mandatory reporting for units >=5 MVA, increases the likelihood of obtaining verifiable, high-quality data from functional entities.
- This approach reduces reliance on estimates for small units, resulting in more accurate models.
- Better models directly enhance BPS reliability.

ACES' member North Carolina's Electric Cooperatives shares the following in addition to the threshold advocated for by ACES: **“Without waiving any rights to assert jurisdiction overreach by NERC/FERC, and assuming for the sake of argument that authority exists: Each DP will coordinate with the RC/TP on projects < 5MVA as needed”.**

Likes	0	
Dislikes	0	

Response

George Goddard - DTE Energy - 5

Answer	No
Document Name	

Comment

I still struggle with R2 2.1: "If the responsible entity, as identified in Requirement R1 Part 1.1, is unable to gather unregistered Inverter-based Resource (IBR)1 data or aggregate Distributed Energy Resource (DER) data, the responsible entity shall estimate the modeling data and parameters and include an explanation of the limitations of 1 As used in this standard, the phrase “unregistered IBR” refers to a Bulk-Power System connected IBR that does not meet the criteria that would require the owner to register with NERC for mandatory Reliability Standards compliance purposes. MOD-032-21 — Data for Power System Modeling and Analysis Initial Draft of MOD-032-2 April 2025 Page 6 of 25 the availability of data, an explanation of the limitations of any data provided, and the method used for estimation. " This creates a burden to the DP and the data may not be accurate enough for study purposes. Documenting the limitations will not address the data inaccuracies. A possible recommendation is to provide a mechanism for the unregistered DER's to become registered and therefore subjected to the same compliance obligations as registered DER's

Likes	0	
Dislikes	0	

Response

Greg Sorenson - ReliabilityFirst - 10 - RF

Answer	No
Document Name	

Comment

It does not appear that the language of the MOD-032 Supporting Document: Process for Updating the Unacceptable Models List Maintained by the Electric Reliability Organization (ERO) has considered the role of the Acceptable Models Working Group (AMWG) under Eastern Interconnection Reliability Assessment Group (ERAG) for building and maintaining the Eastern Interconnection models. But as part of the Standard, the Supporting Document likely supersedes the AMWG, and describes a more centralized process for the maintenance of the official Unacceptable Models List. It

does not appear that the language provided by the SDT aligns with the charter of the AMWG, unless the AMWG fits into the general description of the "ERO Staff" under items 2 and 3.

It should be noted that the MOD-032 designee and associated industry groups comprised of Planning Coordinators may have a modeling group that reviews the technical rationale for using models on the ERO Unacceptable Models List (in R3). While outside of the Standard, this should provide consensus on the validity associated with any technical rationale provided by data submitters.

The present draft of MOD-032 does not include any requirement to modify or replace models that are submitted and are on the ERO Unacceptable Models List and do not have a valid technical rationale. This could be accomplished through the addition of a sub-requirement (R3.3).

To facilitate a timely model building process it may be beneficial to reduce the time that the functional entity has to respond to a technical concern from the PC/TP from 90 to 30 days (R3.2.).

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

The MRO NSRF appreciates the SDT's consideration of comments in the previous ballot and the revisions to the standard made in response. However, the MRO NSRF still has the following concerns:

- The inconsistency of terms used throughout the standard (i.e.: "entity responsible", "functional entity", "entity"). None of these terms are defined except "functional entity" in Footnote 2, and the inconsistency in language is confusing at best or even misleading, bringing ambiguity to a Reliability Standard. These references need to use a consistent term throughout the document. A Reliability Standard should clearly state who is responsible for the evidence required for Compliance. If a single designation is not possible, make it clear that the PC and TP shall designate who is responsible in R1.1 and be consistent with this language throughout the Standard.

- Requirement R2

While the MRO NSRF understands the need for improved modeling, Distribution Providers (DP) are the only entities who have information on DERs interconnected to their distribution systems. Registered entities (TO and DP) do not have the ability to provide or collect DER data from unregistered distribution providers. If this data is critical to the reliability of the BPS, then those unregistered distribution providers that have interconnected DERs that have a material impact on the BPS should be registered through NERC registration criteria and added under 4.1 as a Functional Entity. Moreover, DPs are to provide DER data that has a material impact on the BPS and subpart 2.1 should reflect this important consideration. To address our concerns, Distribution Providers (DPs) shall provide aggregate Distributed Energy Resource (DER) data for DERs that have been identified by the responsible PC and TP to have a material impact on the BPS. The DP shall estimate the modeling data and parameters and include an explanation of the limitations of the availability of data, an explanation of the limitations of any data provided, and the method used for estimation.

- Requirement R3 Concerns

There doesn't seem to be any mechanism whereby a PC or TP can compel the model provider to submit a model or data that is acceptable. There is a 90-day response period that potentially become an end-less loop if the TP doesn't accept the explanation where the technical basis doesn't respond to the technical concerns.

· Section C: Compliance Concerns

Potential Noncompliance (PNC) Abeyance Period

This does not provide any sense of comfort to those entities that are providing estimates to the best of their knowledge that they will not be held in non-compliance by an auditor. This section needs further clarification and not be subject to any Auditor's interpretation. Use of ambiguous words such as "Good Faith" are not auditable and are very subjective and therefore inappropriate in a Reliability Standard. Additionally, there is no guarantee that the Abeyance Period is 1) long enough for NERC to create a new Registered entity (DP-DER) which was the original intent of the Abeyance, 2) will even be approved as it is still a "Potential".

· Section E: Associated Documents

"MOD-032 Supporting Document, Process for Updating the Unacceptable Models List Maintained by the Electric Reliability Organization (ERO)"

As currently presented, this document is NOT part of the Reliability Standard and is NOT enforceable as such and should be maintained as a separate standalone document with the ERO Unacceptable Models List. To keep it at the end of the Standard gives the impression that it is enforceable and part of the standard. However, we believe that the Model Criteria should be included in the affected Reliability Standards and only changed when those Standards are modified and as such it should be an enforceable part of the standard and NOT an Associated Document as listed in Section E.

The MRO NSRF recommends removing the title from Section E as an Associated Document and making it part of MOD-032. Replace the title: MOD-032 Supporting Document with Attachment 2.

· Footnote concerns

o Footnote 1:

The MRO NSRF does not agree with Footnote 1. Data required should be specified within each sub-bullet of each column for both steady-state and dynamics. Failure to do this creates potential confusion. This situation is further amplified by the inclusion of new registered entities such as category 2 GOs.

o Footnote 6:

TO and DP have no ability to collect or provide aggregate data for DERs that are not connected to their system. If DER data is needed from unregistered DP to preserve the reliability of the BPS, then those entities should be registered.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

MEC agrees with the comments of the MRO NSRF. However, none of these concerns rise to the level of a negative ballot for MEC. Consideration and clarifications around the concerns expressed in the MRO NSRF comments would make for a better Reliability Standard if there is opportunity for substantive revisions.

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

Amy Wilke - American Transmission Company, LLC - 1

Answer	No
Document Name	

Comment

While we support the efforts of the drafting team for Draft 2 of MOD-032, there are concerns.

{C}· Use of varying phrases of “entity responsible “or “functional entity”, or “entity”. None of these terms are defined except “functional entity” in Footnote 2 and are confusing at best or misleading, bringing ambiguity to a Reliability Standard. This needs to be consistent throughout the document whichever term is used. A Reliability Standard should know who is responsible for what is required for Compliance. If not, make it clear that the PC and TP shall designate who is responsible in R1.1 and be consistent with this language throughout the Standard.

R1.1 The data listed in Attachment 1, including the entity responsible for each required item **as determined by the PC and TP**.

{C}· Alignment with Project 2024-01

ATC does not agree that MOD-032-2 has been sufficiently aligned with the Project 2024-01 Implementation Plan. As stated in the Project 2024-01 Implementation Plan that Category 2 GOs will be held responsible for GO requirements contained in MOD-032, yet the currently proposed MOD-032-2 Reliability Standard Applicability Section does not clearly identify those entities. While we recognize the proposed definition of GO includes both Category 1 & 2, ATC submits that that the following clarifying addition be added to 4.1.3 of the Applicability Section of MOD-032-2 (shown in **boldface**):

4.1.3 Generator Owner - **Category 1 and 2**

{C}· Requirement R2 Concerns

While it is understood that there is a need for improved modeling, Distribution Providers (DP) are the only entities who have information on DERs interconnected to their distribution systems. Registered entities (TO and DP) do not have the ability to provide or collect DER data from unregistered DP. If this data is critical to the reliability of the BPS, then unregistered DPs that have interconnected DERs that have a material impact on the BPS should be registered through NERC registration criteria and added as under 4.1 as a Functional Entity. Moreover, DPs are to provide DER data that has a material impact on the BPS and subpart 2.1 should reflect this important consideration. To address our concerns, **Distribution Providers (DPs) shall provide** aggregate Distributed Energy Resource (DER) data **for DERs that have been identified by the responsible PC and TP that have a material impact on the BPS.** The **DP** shall estimate the modeling data and parameters and include an explanation of the limitations of the availability of data, an explanation of the limitations of any data provided, and the method used for estimation.

{C}· Requirement R3 Concerns

There doesn't seem to be any mechanism whereby a PC or TP can compel the model provider to submit a model or data that is acceptable. There is a 90-day response period that potentially could end as an end-less loop if the TP doesn't accept that the explanation where the technical basis doesn't respond to the technical concerns.

{C}· Attachment 1 Concerns

Steady State Concerns

Item 9 – TOs are entirely dependent on DPs and should therefore be removed from have direct responsibility for Aggregate DER data.

Dynamics Concerns

Item 10 – Consistent with previous comments, TOs should be removed from Item 10. They have no ability to provide aggregate DER data on any distribution system (registered or unregistered) because they do not own or interconnect those resources directly.

For DERs that are connected to UFLS Only DPs distribution providers, aggregated DER data connected to their distribution systems and information detailing DERs connected to UFLS schemes should be obtained from those registered entities. Additionally, UFLS and UVLS tripping capacity of DERs should be provided

The term “aggregate” should also be clarified for Item 10.

To address our concerns, we offer the following edits (in **boldface** and strikethrough):

10. Aggregate Distributed Energy Resource (DER) data [DP, TOs ~~UFLS DPs~~]

b. Indication whether DERs is subject to tripping in conjunction with are part of any UFLS or UVLS schemes ~~and provide estimates of the affected aggregated tripping capacity on those schemes.~~

{C}· Section C: Compliance Concerns

Potential Noncompliance (PNC) Abeyance Period

This does not provide any sense of comfort to those entities that are providing estimates to the best of their knowledge that they will not be held in non-compliance by an auditor. This section needs further clarification and not subject to any Auditor's interpretation. Use of ambiguous words such as Good Faith are not auditable and very subjective and inappropriate in a Reliability Standard. And there is no guarantee that the Abeyance Period is 1)

long enough for NERC to create a new Registered entity (DP-DER) which was the original intent of the Abeyance, 2) will even be approved as it is still a “Potential”.

{C}· Section E: Associated Documents

MOD-032 Supporting Document, Process for Updating the Unacceptable Models List Maintained by the Electric Reliability Organization (ERO) in the standard. It is NOT part of the Reliability Standard and is NOT enforceable as such and should be maintained as a separate standalone document with the ERO Unacceptable Models List.

To keep it at the end of the Standard gives the impression that it is enforceable and part of the standard.

However, we believe that the Model Criteria should be included in the affected Reliability Standards and only changed when those Standards are modified and as such it should be an enforceable part of the standard and NOT an Associated Document as listed in Section E.

Recommendation is to remove the title from Section E as an Associated Document and make it part of MOD-032. Replace the title: *MOD-032 Supporting Document* with *Attachment 2*.

{C}· Footnote concerns

Footnote 1:

ATC does not agree with Footnote 1. Data required should be specified within each sub-bullet of each column for both steady-state and dynamics. Failure to do this creates potential confusion. This situation is further amplified by the inclusion of new registered entities such as category 2 GOs.

Footnote 6:

TO and DP have no ability to collect or provide aggregate data for DERs that are not connected to their system. If DER data is needed from unregistered DP to preserve the reliability of the BPS, then those entities should be registered.

Likes 0	
Dislikes 0	
Response	
Eric Sutlief - CMS Energy - Consumers Energy Company - 3,4,5 - RF	
Answer	No
Document Name	

Comment	
<p>While the drafting team has attempted to acknowledge the need for an aggregation threshold for DER that materially affects the reliability of the Bulk Power system and has added footnote 7 to attachment 1, footnote 3 contradicts this consideration by omitting a minimum threshold for which gross demand and DER aggregation would not need to be segregated, therefore inadvertently requiring a DP to have all information necessary to account for the DER and rendering provisions under requirement R2.1. useless. R2.1 focuses on aggregate DER data and not gross demand data which is impacted by DER data. DP's may have specific RERRA-jurisdictional regulatory limitations that prevent a DP's ability to parse gross demand from net demand due to BTMG. This is potentially avoided by setting an adequate minimum threshold for DER sizing determined to materially affect the reliability of the bulk power system, filtering out the smaller DER installations where separate metering is unavailable. We recommend the drafting team should expand the intent of footnote 7 to apply to gross vs net demand aggregations in footnote 3 or expand provisions in R2.1 to acknowledge aggregations of gross demand and DER resources, allowing for explanation of limitations in supporting data reporting for aggregate demand as currently defined in attachment 1.</p>	
Likes 0	
Dislikes 0	
Response	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	No
Document Name	
Comment	
<p>We do not agree with R2.1; estimating parameters is not appropriate. If additional data is needed, then it should be required for those GO/GOP entities to submit it to the applicable authority.</p>	
Likes 0	
Dislikes 0	
Response	
Richard Vendetti - NextEra Energy - 5	
Answer	Yes
Document Name	
Comment	
<p>NextEra agrees with the modifications to MOD-032, however supports EEI's request to modify the Abeyance language of Section C, as provided below:</p> <p>For a period of two years following the enforcement date of Reliability Standard MOD-032-2 Requirement R2 under the associated implementation plan, the CEA will not pursue an action under Sections 4A.0 or 5.0 of Appendix 4C of the Rules of Procedure for a failure to comply with Reliability Standard MOD-032-2 Requirement R2 Part 2.1 with respect to the provision of estimated aggregate DER data or estimated data for unregistered IBRs. While the CEA will not pursue compliance actions during this period for entities who develop estimates for aggregate DER data and unregistered IBR data that include the supporting data explanation and methods used as detailed in Requirement R2 subpart 2.1, they will</p>	

pursue actions against entities who do not supply the required estimates, or the explanation of the limits or their methods used to create the estimates provided. Entities shall participate in any compliance monitoring activities undertaken by the CEA during this potential noncompliance abeyance period and submit documentation as requested.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

BPA reiterates its previous comment regarding the TO not being the “appropriate registered entity to be responsible for providing estimations of unregistered load”. BPA asserts ‘actual’ data is the foundation for modeling of the bulk-power system. Without this crucial information, BPA believes estimating small/discrete unregistered IBRs is vague and doesn’t lend itself to creating models aligned with industry ‘best practice’ standards. BPA continues to recommend estimated base information come from the Regional Entity or require the submission of valid data from registered DER and IBR generators.

Additionally, as the DT mentioned in its response to industry comments “modifying NERC registration criteria is not a feasible option for addressing FERC 901 directives within the required timelines”, BPA believes a better, more ‘actual’ data driven alternative for future consideration, is requiring unregistered entities register under a new compliance registry type, such as “DP-DER”.

As this is a new area of focus, opportunity to learn, and refine, BPA agrees with the DT’s Technical Rationale that this standard is a great candidate for an abeyance period. BPA appreciates the inclusion of Section C, bullet 2, CMEP, Potential Noncompliance (PNC) Abeyance Period. This will allow industry to adapt, gain a better understanding, and make the necessary improvements.

In conclusion, BPA appreciates the urgency that NERC is responding to FERC directives but asserts NERC reliability standards should drive reliability. BPA believes grid modeling from ‘actual’ data leads to reliable outcomes.

Likes 0

Dislikes 0

Response

Lincoln Burton - Con Ed - Consolidated Edison Co. of New York - 3

Answer Yes

Document Name

Comment

We do not agree with R2.1; estimating parameters is not appropriate. If additional data is needed, then it should be required for those GO/GOP entities to submit it to the applicable authority.

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	
<p>Black Hills Corporation does not object to the proposed changes made to MOD-032-2, however we do agree with EEI's suggested non-substantive changes for the drafting team to consider.</p> <p>We agree with the concerns shared by EEI members that the lack of specificity regarding the delegation to the PC & TP to determine which entities are responsible for the data requirements in Attachment 1 could lead to some unforeseen difficulties in requesting the data, especially when non-registered entities are involved. The Abeyance Language helps for the short term but may not be the best long-term solution.</p> <p>Black Hills Corporation agrees with EEI on removing bullet 4 from Section E "Process for Updating the Unacceptable Models List Maintained by the ERO" since this is already an attachment to MOD-032-2. This process document should be marked as Attachment 2 to clearly show separation between it and Attachment 1.</p> <p>Black Hills Corporation also agrees with the changes to the Abeyance Language suggested by EEI to make it more clear. The suggested changes from EEI are in bold below:</p> <p>For a period of two years following the enforcement date of Reliability Standard MOD-032-2 Requirement R2 under the associated implementation plan, the CEA will not pursue an action under Sections 4A.0 or 5.0 of Appendix 4C of the Rules of Procedure for a failure to comply with Reliability Standard MOD-032-2 Requirement R2 Part 2.1 with respect to the provision of estimated aggregate DER data or estimated data for unregistered IBRs. While the CEA will not pursue compliance actions during this period for entities who develop estimates for aggregate DER data and unregistered IBR data that include the supporting data explanation and methods used as detailed in Requirement R2 subpart 2.1, they will pursue actions against entities who do not supply the required estimates, or the explanation of the limits or their methods used to create the estimates provided. Entities shall participate in any compliance monitoring activities undertaken by the CEA during this potential noncompliance abeyance period and submit documentation as requested.</p>	
Likes	0
Dislikes	0
Response	
Thomas Brinckman - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CEHE supports EEI comments as proposed.	

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 understands the FERC Order 901 directives and the need to approve the MOD-032 modifications as proposed. However, there are still concerns with the resources required for entities to fulfill the obligations, this is particularly important for smaller entities with limited budgets and time. USV believes that once the standard is implemented, the industry can gain a better understanding of how to achieve the same reliability gain without any additional burdens on entities.	
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 Edison Electric Institute (EEI) on question 1	

Likes	0
Dislikes	0
Response	
Daniel Gacek - Exelon - 1, Group Name Exelon	
Answer	Yes
Document Name	
Comment	
Exelon supports the enhancements suggested in the comments submitted by the EEI.	
Likes	0
Dislikes	0
Response	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	
<p>AZPS supports the following comments submitted by EEI on behalf of its members.</p> <p>EEI members continue to have concerns related to the decision to delegate to the PC and TP, in Requirement 1, the determination of which entities are responsible for the data requirements contained in Attachment 1. To clarify their concerns, this lack of specificity has the potential of creating unforeseen difficulties for both the PCs and TPs requesting the data and those entities identified as being responsible for supplying this data, particularly where non-registered entities are involved. And while the Abeyance language will likely be helpful at alleviating these problems in the short term, it is unclear whether this temporary solution will remedy this issue over the long term.</p> <p>EEI suggests deleting from Section E (Associated Documents) bullet 4, “Process for Updating the Unacceptable Models List Maintained by the ERO” since this document is an attachment to MOD-032-2. Additionally, this process document should be marked and identified as Attachment 2, because as currently contained within MOD-032-2 there is no separation between Attachment 1 and this process document.</p> <p>Finally, EEI appreciates the inclusion of the Abeyance Language, however, the language could be clearer and less repetitive. The subjectivity of the language (e.g., sincere intent) should be removed because it places unnecessary compliance risk on the functional entities responsible. To resolve our concerns, we offer the following suggested language for NERC consideration.</p> <p>For a period of two years following the enforcement date of Reliability Standard MOD-032-2 Requirement R2 under the associated implementation plan, the CEA will not pursue an action under Sections 4A.0 or 5.0 of Appendix 4C of the Rules of Procedure for a failure to comply with Reliability Standard MOD-032-2 Requirement R2 Part 2.1 with respect to the provision of estimated aggregate DER data or estimated data for unregistered IBRs. While the CEA will not pursue compliance actions during this period for entities who develop estimates for aggregate DER data and unregistered IBR data that include the supporting data explanation and methods used as detailed in Requirement R2 subpart 2.1, they will pursue actions against entities who do</p>	

not supply the required estimates, or the explanation of the limits or their methods used to create the estimates provided. Entities shall participate in any compliance monitoring activities undertaken by the CEA during this potential noncompliance abeyance period and submit documentation as requested.

Likes 0

Dislikes 0

Response

Zahid Qayyum - New York Power Authority - 5

Answer

Yes

Document Name

Comment

Regarding R1.4.2 - It is unclear whether this should be applied retroactively to the existing user written models. Its better that this be explicitly clarified within the standard itself .

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Southern Indiana Gas and Electric d/b/a CenterPoint Energy Indiana South (SIGE) supports EEL's comments.

Likes 0

Dislikes 0

Response

Adrian Harris - Adrian Harris On Behalf of: Kirsten Rowley, Midcontinent ISO, Inc., 2; - Adrian Harris, Group Name RTO/ISO Council Standard Review Committee

Answer

Yes

Document Name

[2022-02_Unofficial_Comment_Form SRC.docx](#)

Comment	
<p>In Attachment 1, page 15, the ISO/RTO Council (IRC) Standards Review Committee (SRC) requests additional clarity regarding the following statement:</p> <p><i>“The joint Planning Coordinator/Transmission Planner modeling data requirements and reporting procedures developed under Requirement R1 will specify each entity’s responsibility and data flow processes.”</i></p> <p>In the Consideration of Comments, could the drafting team please clarify how detailed the expectations are with respect to the data flow? Specifically, to what level of granularity should entities describe responsibilities and data exchanges within these processes?</p>	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
<p>ITC does not object to the proposed changes made to MOD-032-2 and appreciates the improvements made since Draft 1. However, we offer some input and non-substantive changes for DT consideration.</p> <p>ITC continues to have concerns related to the decision to delegate to the PC and TP, in Requirement 1, the determination of which entities are responsible for the data requirements contained in Attachment 1. To clarify our concern, this lack of specificity has the potential of creating unforeseen difficulties for both the PCs and TPs requesting the data and those entities identified as being responsible for supplying this data, particularly where non-registered entities are involved. And while the Abeyance language will likely be helpful at alleviating these problems in the short term, it is unclear how this will affect compliance on this issue over the long term.</p>	
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	
<p>Ameren agrees with EEI's comments.</p>	
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	
<p>EEI does not object to the proposed changes made to MOD-032-2 and appreciates the improvements made since Draft 1. However, we offer some non-substantive changes for DT consideration.</p> <p>Some EEI members continue to have concerns related to the decision to delegate to the PC and TP, in Requirement 1, the determination of which entities are responsible for the data requirements contained in Attachment 1. This lack of specificity has the potential of creating unforeseen difficulties for both the PCs and TPs requesting the data and those entities identified as being responsible for supplying this data, particularly where non-registered entities are involved. And while the Abeyance language will likely be helpful at alleviating these problems in the short term, it is unclear whether this temporary solution will remedy this issue over the long term. Nevertheless, we look forward to working with NERC to resolve any issues that might arise surrounding this concern, should this issue manifest itself into legitimate problems.</p> <p>EEI suggests deleting from Section E (Associated Documents) bullet 4, “Process for Updating the Unacceptable Models List Maintained by the ERO” since this document is an attachment to MOD-032-2. Additionally, this process document should be marked and identified as Attachment 2, because as currently contained within MOD-032-2 there is no separation between Attachment 1 and this process document.</p> <p>Finally, EEI appreciates the inclusion of the Abeyance Language, however, the language could be clearer. The subjectivity of the language (e.g., sincere intent) should be removed because it places unnecessary compliance risk the functional entities responsible. To resolve our concerns, we offer the following edits in boldface for NERC consideration. (<i>STRIKETHROUGHS REMOVED</i>)</p> <p>For a period of two years following the enforcement date of Reliability Standard MOD-032-2 Requirement R2 under the associated implementation plan, the CEA will not pursue an action under Sections 4A.0 or 5.0 of Appendix 4C of the Rules of Procedure for a failure to comply with Reliability Standard MOD-032-2 Requirement R2 Part 2.1 with respect to the provision of estimated aggregate DER data or estimated data for unregistered IBRs. While the CEA will not pursue compliance actions during this period for entities who develop estimates for aggregate DER data and unregistered IBR data that include the supporting data explanation and methods used as detailed in Requirement R2 subpart 2.1, they will pursue actions against entities who do not supply the required estimates, or the explanation of the limits or their methods used to create the</p>	

estimates provided. Entities shall participate in any compliance monitoring activities undertaken by the CEA during this potential noncompliance abeyance period and submit documentation as requested.

Likes 0

Dislikes 0

Response

Joshua Phillips - Southwest Power Pool, Inc. (RTO) - 2

Answer

Yes

Document Name

Comment

SPP supports the comments provided by the IRC Standards Review Committee

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 does not object to the proposed changes made to MOD-032-2 and appreciates the improvements made since Draft 1. However, we offer some non-substantive changes for DT consideration.

Some EEI members continue to have concerns related to the decision to delegate to the PC and TP, in Requirement 1, the determination of which entities are responsible for the data requirements contained in Attachment 1. This lack of specificity has the potential of creating unforeseen difficulties for both the PCs and TPs requesting the data and those entities identified as being responsible for supplying this data, particularly where non-registered entities are involved. And while the Abeyance language will likely be helpful at alleviating these problems in the short term, it is unclear whether this temporary solution will remedy this issue over the long term. Nevertheless, we look forward to working with NERC to resolve any issues that might arise surrounding this concern, should this issue manifest itself into legitimate problems.

EEI suggests deleting from Section E (Associated Documents) bullet 4, “Process for Updating the Unacceptable Models List Maintained by the ERO” since this document is an attachment to MOD-032-2. Additionally, this process document should be marked and identified as Attachment 2, because as currently contained within MOD-032-2 there is no separation between Attachment 1 and this process document.

Finally, EEI appreciates the inclusion of the Abeyance Language, however, the language could be clearer. The subjectivity of the language (e.g., sincere intent) should be removed because it places unnecessary compliance risk the functional entities responsible. To resolve our concerns, we offer the following edits in boldface for NERC consideration. (*STRIKETHROUGHS REMOVED*)

For a period of two years following the **enforcement** date of Reliability Standard MOD-032-2 Requirement R2 under the associated implementation plan, the CEA will not pursue an action under Sections 4A.0 or 5.0 of Appendix 4C **of** the Rules of Procedure for a failure to comply with Reliability Standard MOD-032-2 Requirement R2 Part 2.1 with respect to the provision of estimated aggregate DER data or estimated data **for unregistered IBRs. While the CEA will not pursue compliance actions during this period for entities who develop**

EEI does not object to the proposed changes made to MOD-032-2 and appreciates the improvements made since Draft 1. However, we offer some non-substantive changes for DT consideration.

Some EEI members continue to have concerns related to the decision to delegate to the PC and TP, in Requirement 1, the determination of which entities are responsible for the data requirements contained in Attachment 1. This lack of specificity has the potential of creating unforeseen difficulties for both the PCs and TPs requesting the data and those entities identified as being responsible for supplying this data, particularly where non-registered entities are involved. And while the Abeyance language will likely be helpful at alleviating these problems in the short term, it is unclear whether this temporary solution will remedy this issue over the long term. Nevertheless, we look forward to working with NERC to resolve any issues that might arise surrounding this concern, should this issue manifest itself into legitimate problems.

EEI suggests deleting from Section E (Associated Documents) bullet 4, “Process for Updating the Unacceptable Models List Maintained by the ERO” since this document is an attachment to MOD-032-2. Additionally, this process document should be marked and identified as Attachment 2, because as currently contained within MOD-032-2 there is no separation between Attachment 1 and this process document.

Finally, EEI appreciates the inclusion of the Abeyance Language, however, the language could be clearer. The subjectivity of the language (e.g., sincere intent) should be removed because it places unnecessary compliance risk the functional entities responsible. To resolve our concerns, we offer the following edits in boldface for NERC consideration. (*STRIKETHROUGHS REMOVED*)

For a period of two years following the **enforcement** date of Reliability Standard MOD-032-2 Requirement R2 under the associated implementation plan, the CEA will not pursue an action under Sections 4A.0 or 5.0 of Appendix 4C **of** the Rules of Procedure for a failure to comply with Reliability Standard MOD-032-2 Requirement R2 Part 2.1 with respect to the provision of estimated aggregate DER data or estimated data **for unregistered IBRs. While the CEA will not pursue compliance actions during this period for entities who develop**

EEI does not object to the proposed changes made to MOD-032-2 and appreciates the improvements made since Draft 1. However, we offer some non-substantive changes for DT consideration.

Some EEI members continue to have concerns related to the decision to delegate to the PC and TP, in Requirement 1, the determination of which entities are responsible for the data requirements contained in Attachment 1. This lack of specificity has the potential of creating unforeseen difficulties for both the PCs and TPs requesting the data and those entities identified as being responsible for supplying this data, particularly where non-registered entities are involved. And while the Abeyance language will likely be helpful at alleviating these problems in the short term, it is unclear whether this

temporary solution will remedy this issue over the long term. Nevertheless, we look forward to working with NERC to resolve any issues that might arise surrounding this concern, should this issue manifest itself into legitimate problems.

EEl suggests deleting from Section E (Associated Documents) bullet 4, “Process for Updating the Unacceptable Models List Maintained by the ERO” since this document is an attachment to MOD-032-2. Additionally, this process document should be marked and identified as Attachment 2, because as currently contained within MOD-032-2 there is no separation between Attachment 1 and this process document.

Finally, EEl appreciates the inclusion of the Abeyance Language, however, the language could be clearer. The subjectivity of the language (e.g., sincere intent) should be removed because it places unnecessary compliance risk the functional entities responsible. To resolve our concerns, we offer the following edits in boldface for NERC consideration. (*STRIKETHROUGHS REMOVED*)

For a period of two years following the **enforcement** date of Reliability Standard MOD-032-2 Requirement R2 under the associated implementation plan, the CEA will not pursue an action under Sections 4A.0 or 5.0 of Appendix 4C **of** the Rules of Procedure for a failure to comply with Reliability Standard MOD-032-2 Requirement R2 Part 2.1 with respect to the provision of estimated aggregate DER data or estimated data **for unregistered IBRs. While the CEA will not pursue compliance actions during this period for entities who develop**

EEl does not object to the proposed changes made to MOD-032-2 and appreciates the improvements made since Draft 1. However, we offer some non-substantive changes for DT consideration.

Some EEl members continue to have concerns related to the decision to delegate to the PC and TP, in Requirement 1, the determination of which entities are responsible for the data requirements contained in Attachment 1. This lack of specificity has the potential of creating unforeseen difficulties for both the PCs and TPs requesting the data and those entities identified as being responsible for supplying this data, particularly where non-registered entities are involved. And while the Abeyance language will likely be helpful at alleviating these problems in the short term, it is unclear whether this temporary solution will remedy this issue over the long term. Nevertheless, we look forward to working with NERC to resolve any issues that might arise surrounding this concern, should this issue manifest itself into legitimate problems.

EEl suggests deleting from Section E (Associated Documents) bullet 4, “Process for Updating the Unacceptable Models List Maintained by the ERO” since this document is an attachment to MOD-032-2. Additionally, this process document should be marked and identified as Attachment 2, because as currently contained within MOD-032-2 there is no separation between Attachment 1 and this process document.

Finally, EEl appreciates the inclusion of the Abeyance Language, however, the language could be clearer. The subjectivity of the language (e.g., sincere intent) should be removed because it places unnecessary compliance risk the functional entities responsible. To resolve our concerns, we offer the following edits in boldface for NERC consideration. (*STRIKETHROUGHS REMOVED*)

For a period of two years following the **enforcement** date of Reliability Standard MOD-032-2 Requirement R2 under the associated implementation plan, the CEA will not pursue an action under Sections 4A.0 or 5.0 of Appendix 4C **of** the Rules of Procedure for a failure to comply with Reliability Standard MOD-032-2 Requirement R2 Part 2.1 with respect to the provision of estimated aggregate DER data or estimated data **for unregistered IBRs. While the CEA will not pursue compliance actions during this period for entities who develop estimates for aggregate DER data and unregistered IBR data that include the supporting data explanation and methods used as detailed in Requirement R2 subpart 2.1, they will pursue actions against entities who do not supply the required estimates, or the explanation of the limits or their methods used to create the estimates provided.** Entities shall participate in any compliance monitoring activities undertaken by the CEA during this potential noncompliance abeyance period and submit documentation as requested.

Likes	0
Dislikes	0
Response	
Kevin Conway - Western Power Pool - 4	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jonathon Flores - Los Angeles Department of Water and Power - 1,3,5,6	
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		
Karina Valencia - Karina Valencia On Behalf of: Byron Booker, Oncor Electric Delivery, 1; - Karina Valencia		
Answer	Yes	
Document Name		
Comment		
Likes	0	
Dislikes	0	
Response		
Alain Mukama - Alain Mukama On Behalf of: Emma Halilovic, Hydro One Networks, Inc., 1; - Alain Mukama		
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		
Joshua London - Eversource Energy - 1,3, Group Name Eversource		
Answer	Yes	

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 10, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5	
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	
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	
Scott Thompson - TXNM Energy - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Fausto Serratos - Los Angeles Department of Water and Power - 3	
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	
Robert Follini - Avista - Avista Corporation - 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	
Brittany Millard - Lincoln Electric System - 5	
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	
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	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
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	
<p>Southern Company does not object to the proposed changes made to MOD-032-2 and appreciates the drafting team's efforts in addressing concerns from Draft 1 of MOD-032-2. However, we offer some input and non-substantive changes for the DT consideration.</p> <p>Requirement R1 Part 1.1 and Attachment 1 - While Southern Company appreciates the clarification provided in the technical rationale, Southern Company is concerned that not requiring the PC/TP to designate NERC registered functional entities in Requirement R1 could lead to a gap in enforceability. Southern Company recommends adding the word 'Functional' in front of entities to make it clear that the standard requires the PC/TP to designate registered functional entities. While Southern Company agrees that data can be sourced from both registered and unregistered entities, a registered entity must be specified as responsible in Requirement R1 for Requirement R2 to be fully enforceable.</p> <p>Requirement R2 Part 2.2 – Southern Company appreciates the alignment of proposed standards MOD-032-2 and MOD-026-2. While the intent is clear in the technical rationale, Southern Company proposes the language below to better align with MOD-026-2.</p> <p>“..., the functional entity shall provide the models that its Transmission Planner received and provided a written notification that the model(s) and accompanying documentation are acceptable in accordance with MOD-026, where such models are available.”</p> <p>Additionally, Southern Company supports EEI Comments.</p>	
Likes 0	
Dislikes 0	
Response	

2. Do you agree with the proposed IRO-010-6 and TOP-003-8 modifications? If you do not support the modifications made, please provide rationale and proposed language on how you would address the FERC Order 901 directives.

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

Answer No

Document Name

Comment

As IRO-010-6, Requirement R1, Part 1.1 is currently drafted, it is unclear if the phrase “as deemed necessary by the Reliability Coordinator” at the end of Part 1.1 applies only to “identification of the entities responsible for responding to the specification” or if it applies to every category of data and information listed in Part 1.1. To address this ambiguity, ERCOT recommends that the phrase “as deemed necessary by the Reliability Coordinator” be moved from the end of Part 1.1 to the beginning of the list of data and information in Part 1.1, as follows:

A list of data and information needed by the Reliability Coordinator to support its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments, **as deemed necessary by the Reliability Coordinator**, including non-BES data and information, external network data and information, Inverter-based Resource (IBR)-specific data and parameters, and identification of the entities responsible for responding to the specification.

A similar ambiguity exists in the current draft of TOP-003-8. Consequently, ERCOT recommends that corresponding modifications be made to Requirement R1, Part 1.1 and Requirement R2, Part 2.1 in TOP-003-8.

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 No

Document Name

Comment

Tacoma Power does not support TOP-003 R1.5.3 because there is a lack of clarity and ambiguity in the Requirement language, as noted by other entities' comments (specifically, BPA).

Likes 0

Dislikes 0

Response

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

Answer No

Document Name	
Comment	
MEC agrees with the comments of the MRO NSRF. However, none of these concerns rise to the level of a negative ballot for MEC. Consideration and clarifications around the concerns expressed in the MRO NSRF comments would make for a better Reliability Standard if there is opportunity for substantive revisions.	
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>The MRO NSRF would appreciate more clarity on “as applicable” as it is used in multiple sub-requirements throughout these two standards.</p> <p>Additionally, the MRO NSRF requests the changes to TOP and IRO be based upon requirements for using the data, potentially as envisioned in Milestone 4. As written, the use of planning models in the real-time operations, “as applicable”, seems to create a requirement the RC or BA gather data that may be of no value to these entities. Under the current standards, the information needed may be gathered by those entities if it is needed for reliability. If this change stands, it may require the RC and BA gather data for compliance purposes only and provide no real time value.</p>	
Likes 0	
Dislikes 0	
Response	
Joshua Phillips - Southwest Power Pool, Inc. (RTO) - 2	
Answer	No
Document Name	
Comment	
SPP supports the comments provided by the IRC Standards Review Committee	
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	
<p>It is the opinion of ACES that NERC registered entities should not be subjected to potential violations of multiple NERC Reliability Standards Requirements for a single action. In other words, we contend that by including requirements for model submissions in both MOD-032-2 and in a documented data specification(s), responsible entities will now be subject to a form of double jeopardy (i.e., claim preclusion).</p> <p>ACES recommends only requiring model submissions under MOD-032-2 and subsequently striking the following newly proposed requirement parts: IRO-010-6 Requirement R1 Part 1.5.3, TOP-003-8 Requirement R1 Part 1.5.3, and TOP-003-8 Requirement R2 Part 2.5.3.</p>	
Likes 0	
Dislikes 0	
Response	
Adrian Harris - Adrian Harris On Behalf of: Kirsten Rowley, Midcontinent ISO, Inc., 2; - Adrian Harris, Group Name RTO/ISO Council Standard Review Committee	
Answer	No
Document Name	2022-02_Unofficial_Comment_Form SRC.docx
Comment	
<p>The RC and BA are able to obtain the necessary model information to support real time assessments, real-time monitoring, and analysis within the current standards. Accordingly, we believe the proposed modification is unnecessary. Until such time as there is an obligation on the RC or BA to use the data in real time, then these changes are premature or unwarranted</p> <p>SRC is concerned about the phrasing with “as applicable” and the requirements to use planning models. This phrase is unclear for how it may be applied during an audit. Additional clarity could be added by clarifying at the discretion of the RC, these models may be used. If there are criteria envisioned it would be more appropriate to document those in the standard itself rather than leverage the planning models in the operational requirements.</p>	
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 No

Document Name

Comment

The focus should be on using data for real-time operations that do not gather data as mentioned by other participants. These standards (IRO-010/TOP-003) were created to have needed data that have been produced by other standards.

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5

Answer No

Document Name

Comment

TAL believes the intent of 2.5.3 is well intended, but that this standard does not belong in TOP-003-8, R2. R2 is a BA standard. R2.5.3 seems to be a modeling standard. R2.5.3 seems redundant with respect to other modeling and commissioning standards being developed. TAL believes that in all practical sense, this must be accomplished in planning standards, which come into play during interconnection studies, model verification and validation processes and commissioning.

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer No

Document Name

Comment

BC Hydro appreciates the drafting team responsiveness to our comments and the subsequent revisions to Requirements R1 Part 1.5.3 in IRO-010-6 and TOP-003-8 and Requirement R2 Part 2.5.3 in TOP-003-8, which now require the RC, BA and TOP functions to maintain in their data specs methods for entities to provide data and information, including "Requirements for model submissions to be consistent with the model submitted for planning purposes". We noted in the Technical Rationale the stated objective of aligning the planning and operations models with reference to MOD-032-2, applicable on the Long-term Planning Time Horizon, as the typical driver for planning models submission. However, BC Hydro suggests that

additional clarity in the context of the IRO-010 and TOP-003 standards, which are applicable in the Operations Planning Time Horizon, on modeling requirements possibly not in scope of the RC/BA/TOP.

If the intent is to mandate that entities identified in R1 Part 1.1 to submit system models consistent with those generated per MOD-032-3 (where possible as discussed in the Technical Rationale), BC Hydro suggests that the wording be revised to better reflect this. As drafted, it is not immediately clear which requirements the data spec documentation must include, and whether these requirements pertain to the models, models submission, or both.

Proposed wording for 1.5.3: Provisions for any model required for submission under the R1 data specification be consistent with the models created in accordance with MOD-032-2.

Likes 1	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre
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Dislikes 0	
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Response

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

Answer	No
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Document Name	
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Comment

Modeling data requirements should not be part of real-time data and information specification documents. Modeling data should remain in MOD standard.

Likes 0	
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Dislikes 0	
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Response

Kelly Heims - Central Iowa Power Cooperative - 1

Answer	No
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Document Name	
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Comment

Central Iowa Power Cooperative supports the comments submitted by ACES.

Likes 0	
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Dislikes 0	
------------	--

Response

Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Stephanie Kenny - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
EEI supports the proposed modification contained in both IRO-010-6 and TOP-003-8.	
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	
Thomas Breen - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1	
Answer	Yes
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

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 proposed IRO-010-6 and TOP-003-8 modifications.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

EEl supports the proposed modification contained in both IRO-010-6 and TOP-003-8.

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	
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	
Robert Jones - Seattle City Light - 4	
Answer	Yes
Document Name	
Comment	
SCL supports Western Power Pool's comments.	
Likes	0
Dislikes	0

Response	
Thomas Brinckman - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
CEHE has no further comment.	
Likes 0	
Dislikes 0	
Response	
Lincoln Burton - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
FirstEnergy found no issues with updates to IRO-010-6 and TOP-003-8.	
Likes 0	
Dislikes 0	
Response	

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
<p>Per the NERC ROP, Section 300, reliability standards should use ‘clear language’: “Responsible entities, using reasonable judgment and in keeping with good utility practices, are able to arrive at a consistent interpretation of the required performance”. With that, BPA has concerns as to how the proposed TOP-003 R1.5.3 language “consistent with the model submitted for planning purposes, as applicable” will be interpreted by an auditor. BPA believes the current state estimation model and planning models differ in many cases. Where there are differences, those differences are usually driven by the unavailability of real time data for that model or the need to simplify it to obtain consistent solutions. In the technical rationale document, the drafting team claims the “as applicable” addresses that. Based on the seemingly open nature of R1.5.3, BPA has uncertainty that industry’s interpretation of “as applicable” will be the same as that of an auditor. BPA seeks clarity from the drafting team.</p>	
Likes 1	Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merre
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Amy Wilke - American Transmission Company, LLC - 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**Brittany Millard - Lincoln Electric System - 5****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

Robert Follini - Avista - Avista Corporation - 3

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

Ben Hammer - Western Area Power Administration - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott Thompson - TXNM Energy - 3	
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

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Zahid Qayyum - New York Power Authority - 5

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

Isidoro Behar - Long Island Power Authority - 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	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 10, Group Name NPCC RSC	
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

Joshua London - Eversource Energy - 1,3, Group Name Eversource

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

Josh Schumacher - Black Hills Corporation - 6, Group Name Black Hills Corporation Segments 1, 3, 5, 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Alain Mukama - Alain Mukama On Behalf of: Emma Halilovic, Hydro One Networks, Inc., 1; - Alain Mukama	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Brian Lindsey - Entergy - 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		
Dermot Smyth - Con Ed - Consolidated Edison Co. of New York - 1, Group Name Con Edison		
Answer	Yes	
Document Name		
Comment		
Likes	0	
Dislikes	0	
Response		
Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 5		
Answer	Yes	
Document Name		
Comment		
Likes	0	
Dislikes	0	
Response		
Randy Peters - Manitoba Hydro - 1,3,5,6 - MRO		
Answer	Yes	
Document Name		
Comment		
Likes	0	
Dislikes	0	
Response		
Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 6		

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Vendetti - NextEra Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
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	
Karina Valencia - Karina Valencia On Behalf of: Byron Booker, Oncor Electric Delivery, 1; - Karina Valencia	
Answer	
Document Name	
Comment	
Abstain	
Likes 0	
Dislikes 0	
Response	

3. Do you agree that the modifications for the proposed reliability standards (MOD-032-2, IRO-010-6, and TOP-003-8) address the scope of the standard authorization request (SAR) 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.

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

Answer No

Document Name

Comment

Regarding FirstEnergy's response to Q1 and Q2, FirstEnergy cannot determine the cost-effectiveness of achieving compliance toward this modification of MOD-032-2.

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

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer No

Document Name

Comment

Texas RE does not have comments.

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	No
Document Name	
Comment	
Obtaining data from unregistered entities is not cost efficient. Having redundant tasks in multiple standards does not add to cost savings as mentioned by other participants.	
Likes 0	
Dislikes 0	
Response	
Adrian Harris - Adrian Harris On Behalf of: Kirsten Rowley, Midcontinent ISO, Inc., 2; - Adrian Harris, Group Name RTO/ISO Council Standard Review Committee	
Answer	No
Document Name	2022-02_Unofficial_Comment_Form SRC.docx
Comment	
TOP-003 and IRO-010 Requirements to gather data that is not needed or utilized by the RC or BA become an administrative burden to track and assess. Other expenses to store the unnecessary data highlight the ineffectiveness of costs.	
Likes 0	
Dislikes 0	
Response	
Steven Taddeucci - NiSource - Northern Indiana Public Service Co. - 3	
Answer	No
Document Name	

Comment	
TOP-003 and IRO-010 Requirements to gather data that is not needed or utilized by the RC or BA become an administrative burden to track and assess. Other expenses to store the unnecessary data highlight the ineffectiveness of costs.	
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	
<p>ACES does not believe the proposed modifications to MOD-032-2 represent the most cost-effective means of addressing FERC Directive 901. ACES asserts that the DT remains well within the scope of the directive in establishing a threshold to define “material affect.” By proactively setting a threshold of 20 MVA or greater in aggregate and requiring mandatory reporting for inverter-based resource - distributed energy resources (IBR-DER) with individual nameplate ratings of 5 MVA or greater, the DT can satisfy the intent of the Standard Authorization Request (SAR) while enabling a more economically viable implementation for industry stakeholders.</p> <p>This approach allows entities to provide more meaningful and actionable data to the Planning Coordinator (PC) and Transmission Planner (TP), without incurring the significant compliance, legal, and accounting burdens associated with parsing and aggregating distribution-level interconnection agreements for small-scale IBR-DER units. Distribution providers would be able to leverage existing billing and metering systems to determine aggregate IBR-DER values and assess applicability under MOD-032-2 Requirement R2.1. This methodology is expected to offer a more practical and cost-effective path to compliance with FERC Directive 901.</p> <p>Furthermore, the resulting data provided to the PC/TP would likely be of higher quality, as individual nameplate data for IBR-DER units rated at or above 5 MVA is more readily obtainable and verifiable. This targeted reporting would yield more reliable data than estimates derived from significantly smaller IBR-DER units. Finally, this approach would reduce the volume of data sets requiring manual review and integration by the PC/TP, thereby lowering resource demands and improving overall cost efficiency.</p>	
Likes 0	
Dislikes 0	
Response	
Joshua Phillips - Southwest Power Pool, Inc. (RTO) - 2	
Answer	No
Document Name	
Comment	

SPP supports the comments provided by the IRC Standards Review Committee

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

For MOD-032, there will be an administrative burden due to the need to:

- Develop a methodology and process for the estimation process for data that is not available to the TO. This would not be a one-time effort but year over year as DER increases.
- Increased outreach to other entities such as registered DPs for their best estimate on the modeling.
- There will be a need to increase personnel to do the work that is already a tight market for applicable employees.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

MEC agrees with the comments of the MRO NSRF. However, none of these concerns rise to the level of a negative ballot for MEC. Consideration and clarifications around the concerns expressed in the MRO NSRF comments would make for a better Reliability Standard if there is opportunity for substantive revisions.

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	
Amy Wilke - American Transmission Company, LLC - 1	
Answer	No
Document Name	
Comment	
For MOD-032, this will be an administrative burden due to the need to:	
{C}· Develop a methodology and process for the estimation process for data that is not available to the TO. This would not be a one-time effort but year over year as DER increases.	
{C}· Increased outreach to other entities such as registered DPs for their best estimate on the modeling.	
{C}· There will be a need to increase personnel to do the work that is already a tight market for applicable employees.	
There are no foreseen issues with IRO-010-6 or TOP-003-8.	
Likes 0	
Dislikes 0	
Response	
Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Lincoln Burton - Con Ed - Consolidated Edison Co. of New York - 3**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**Daniela Atanasovski - APS - Arizona Public Service Co. - 1****Answer** Yes**Document Name****Comment**

none

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 the modifications for the proposed reliability standards address the scope of the SAR in a cost-effective manner.	
Likes 0	
Dislikes 0	
Response	
Kevin Conway - Western Power Pool - 4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Vendetti - NextEra Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jonathon Flores - Los Angeles Department of Water and Power - 1,3,5,6	
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	
Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 6	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Randy Peters - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 5	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dermot Smyth - Con Ed - Consolidated Edison Co. of New York - 1, Group Name Con Edison	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Brian Lindsey - Entergy - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Alain Mukama - Alain Mukama On Behalf of: Emma Halilovic, Hydro One Networks, Inc., 1; - Alain Mukama	
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	
Joshua London - Eversource Energy - 1,3, Group Name Eversource	
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	
Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5	
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	
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	
Zahid Qayyum - New York Power Authority - 5	
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	
Scott Thompson - TXNM Energy - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Fausto Serratos - Los Angeles Department of Water and Power - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
George Goddard - DTE Energy - 5	
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	
Robert Follini - Avista - Avista Corporation - 3	
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	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Brittany Millard - Lincoln Electric System - 5	
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	
Wesley Yeomans - New York State Reliability Council - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	
Document Name	
Comment	
No comment on cost effectiveness as Duke Energy's focus is on reliability of the BES.	

Likes	0	
Dislikes	0	
Response		
Karina Valencia - Karina Valencia On Behalf of: Byron Booker, Oncor Electric Delivery, 1; - Karina Valencia		
Answer		
Document Name		
Comment		
Abstain		
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		
Thomas Brinckman - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE		
Answer		
Document Name		
Comment		
CEHE has no comment.		
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	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	

4. Do you agree with the proposed ERO Unacceptable Models List? If you do not agree, please provide alternative language and explain the rationale that, if made, would result in your support.

Steven Taddeucci - NiSource - Northern Indiana Public Service Co. - 3

Answer No

Document Name

Comment

NIPSCO does not believe that models on the unapproved list should be allowed to be used, even if technical justification is provided for doing so. There are legitimate reasons why these models should not be used, so a path for their potential inclusion should not be provided.

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 No

Document Name

Comment

Transmission Planners cannot submit models to the regional case build process that are not approved models. By allowing this, we will create a very costly and unproductive loop where DER models that are unacceptable keep getting sent back from the TP to the DP until they are acceptable. A standalone methodology would be better as mentioned by other participants.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

The act of renaming is creating a new list, not just replacing the old, acceptable model list. The ERO Unacceptable Models List does not have industry consensus and was not established through the standards process. TVA does not believe it should be referenced in a compliance standard. In its place, TVA recommends specifications for standard models (where appropriate and available), user-written models (where appropriate and with adequate documentation), and other models (when no alternative is available and requiring justification for use).

Likes	0
Dislikes	0
Response	
Thomas Foltz - AEP - 5	
Answer	No
Document Name	
Comment	
AEP does not believe that models on the unapproved list should be allowed to be used, even if technical justification is provided for doing so. There are legitimate reasons why these models should not be used, so a path for their potential inclusion should not be provided.	
Likes	0
Dislikes	0
Response	
Adrian Harris - Adrian Harris On Behalf of: Kirsten Rowley, Midcontinent ISO, Inc., 2; - Adrian Harris, Group Name RTO/ISO Council Standard Review Committee	
Answer	No
Document Name	2022-02_Unofficial_Comment_Form SRC.docx
Comment	
Likes	0
Dislikes	0
Response	
Devin Shines - PPL - Louisville Gas and Electric Co. - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	
Comment	
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 ERO's Unacceptable Model List.

Likes 0

Dislikes 0

Response**Greg Sorenson - ReliabilityFirst - 10 - RF****Answer** Yes**Document Name****Comment**

It does not appear that the language of the MOD-032 Supporting Document: Process for Updating the Unacceptable Models List Maintained by the Electric Reliability Organization (ERO) has considered the role of the AMWG under ERAG for building and maintaining the Eastern Interconnection models. I believe this document is more formal, and describes a more centralized process for the maintenance of the official Unacceptable Models List. It does not appear that the language provided by the SDT aligns with the charter of the AMWG, unless the AMWG fits into the general description of the "ERO Staff" under items 2 and 3.

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 ERO's Unacceptable Model List.

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 ERO's Unacceptable Model List.

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	
Carver Powers - Utility Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	
USV agrees with the ERO Unacceptable Model List but requests that the reason for models being unacceptable be made public to provide clarity on Requirement R2.3.	
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	
Thomas Brinckman - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	

Comment	
CEHE has no further comment.	
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 agrees with the proposed ERO Unacceptable Models List.	
Likes 0	
Dislikes 0	
Response	
Lincoln Burton - Con Ed - Consolidated Edison Co. of New York - 3	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	

No additional comments.

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

Wesley Yeomans - New York State Reliability Council - 10

Answer

Yes

Document Name

Comment

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	
Amy Wilke - American Transmission Company, LLC - 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	
Amy Key - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
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	
Brittany Millard - Lincoln Electric System - 5	
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	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joshua Phillips - Southwest Power Pool, Inc. (RTO) - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Robert Follini - Avista - Avista Corporation - 3	
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	
George Goddard - DTE Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Fausto Serratos - Los Angeles Department of Water and Power - 3	
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	

Ben Hammer - Western Area Power Administration - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Allie Gavin - Allie Gavin On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Scott Thompson - TXNM Energy - 3	
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	
Zahid Qayyum - New York Power Authority - 5	
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	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Isidoro Behar - Long Island Power Authority - 1	
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	
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	
Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5	
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	
Alain Mukama - Alain Mukama On Behalf of: Emma Halilovic, Hydro One Networks, Inc., 1; - Alain Mukama	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Karina Valencia - Karina Valencia On Behalf of: Byron Booker, Oncor Electric Delivery, 1; - Karina Valencia

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Lindsey - Entergy - 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

Dermot Smyth - Con Ed - Consolidated Edison Co. of New York - 1, Group Name Con Edison

Answer Yes

Document Name

Comment

Likes 0	
Dislikes 0	
Response	
Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Randy Peters - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 6	
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	
Jonathon Flores - Los Angeles Department of Water and Power - 1,3,5,6	
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	
Richard Vendetti - NextEra Energy - 5	
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		

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

Thomas Foltz - AEP - 5

Answer

Document Name

Comment

AEP recommends that the Attachment “Process for Updating the Unacceptable Models List Maintained by the Electric Reliability Organization (ERO)” be removed from the MOD-032 standard, and added instead to the ERO Unacceptable Models List document.

Likes 0

Dislikes 0

Response

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

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

Answer

Document Name

Comment

Duke Energy believes MOD-032-2 R2.2 creates Requirement duplication by providing models already outlined and required in NERC MOD-026. The duplication creates the potential for non-compliance in two separate Standards, while also introducing overlapping documentation and reporting and possibly conflicting deadlines. Because MOD-032-2 R2.2 results in increased risk of Non-Compliance for the applicable entities, Duke Energy recommends R2.2 be deleted from the Standard.

Likes 0

Dislikes	0
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	
Document Name	
Comment	
FirstEnergy offers no additional comments.	
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	
TVA appreciates the efforts by the standard draft team. Regarding Attachment 1 Dynamics 10.b, this data could be difficult to accurately model for situations where the DP will often reconfigure their systems and move DERs between feeders. TVA recommends removing 10.b.	
Likes	0
Dislikes	0
Response	

Lincoln Burton - Con Ed - Consolidated Edison Co. of New York - 3**Answer****Document Name****Comment**

We do not agree that the TO is the appropriate entity for collecting and providing data for DER where there is no associated registered DP between the DER connection point and the TO's system. In the NY area, the most appropriate entity would be the NYISO; this requirement should be moved to the BA/PC. The NYISO is in a better position to require entities to submit the required data when they join the market; individual TOs cannot. The NYISO has processes for maintaining the necessary system representation data to comply with FERC, NERC, NPCC, and NYSRC requirements.

Likes 0

Dislikes 0

Response**Jason Chandler - Con Ed - Consolidated Edison Co. of New York - 6****Answer****Document Name****Comment**

We do not agree that the TO is the appropriate entity for collecting and providing data for DER where there is no associated registered DP between the DER connection point and the TO's system. In the NY area, the most appropriate entity would be the NYISO; this requirement should be moved to the BA/PC. The NYISO is in a better position to require entities to submit the required data when they join the market; individual TOs cannot. The NYISO has processes for maintaining the necessary system representation data to comply with FERC, NERC, NPCC, and NYSRC requirements.

Likes 0

Dislikes 0

Response**Michelle Pagano - Con Ed - Consolidated Edison Co. of New York - 5****Answer****Document Name****Comment**

We do not agree that the TO is the appropriate entity for collecting and providing data for DER where there is no associated registered DP between the DER connection point and the TO's system. In the NY area, the most appropriate entity would be the NYISO; this requirement should be moved to the BA/PC. The NYISO is in a better position to require entities to submit the required data when they join the market; individual TOs cannot. The NYISO has processes for maintaining the necessary system representation data to comply with FERC, NERC, NPCC, and NYSRC requirements.

Likes	0
Dislikes	0
Response	
Dermot Smyth - Con Ed - Consolidated Edison Co. of New York - 1, Group Name Con Edison	
Answer	
Document Name	
Comment	
<p>We do not agree that the TO is the appropriate entity for collecting and providing data for DER where there is no associated registered DP between the DER connection point and the TO's system. In the NY area, the most appropriate entity would be the NYISO; this requirement should be moved to the BA/PC. The NYISO is in a better position to require entities to submit the required data when they join the market; individual TOs cannot. The NYISO has processes for maintaining the necessary system representation data to comply with FERC, NERC, NPCC, and NYSRC requirements.</p>	
Likes	0
Dislikes	0
Response	
Brian Lindsey - Entergy - 1	
Answer	
Document Name	
Comment	
No additional comments	
Likes	0
Dislikes	0
Response	
Alain Mukama - Alain Mukama On Behalf of: Emma Halilovic, Hydro One Networks, Inc., 1; - Alain Mukama	
Answer	
Document Name	
Comment	
None	

Likes	0
Dislikes	0
Response	
Thomas Brinckman - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	
Document Name	
Comment	
CEHE supports EEI comments as proposed.	
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	
Joshua London - Eversource Energy - 1,3, Group Name Eversource	
Answer	
Document Name	
Comment	
Eversource suggests defining or modifying the phrase “standard library models” in MOD-032 R1.4.1 to make it less application-specific as this phrase has no set meaning in some software.	

Eversource suggests the removal of Footnote 5 from Attachment 1 of MOD-032. This phrase provides little to no value and only provides speculation whereas Requirement R1.1 already defines a mechanism to assign ownership. In some regions, these data points may not be provided by the TO, but the footnote seems to imply that it should.

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer

Document Name

Comment

The 2022-02 Technical Rationale (TR) in its IRO-010-6 and TOP-003-8 section (page 14) seems to indicate that modifications were made to “add reference to MOD-032”, however the only reference to MOD-032 has been added in the 2022-02 TR via the clarification on the intent behind the revised R1 Part 1.5.3 (and R2 Part 2.5.3 for TOP-003 only).

Please clarify if the intention is to add a MOD-032 reference to Standards as well.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 10, Group Name NPCC RSC

Answer

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Scott Langston - Tallahassee Electric (City of Tallahassee, FL) - 1,5

Answer

Document Name

Comment	
To reiterate, TAL believes the intent of 2.5.3 is well intended, but that this standard does not belong in TOP-003-8, R2. R2 is a BA standard. R2.5.3 seems to be a modeling standard. R2.5.3 seems redundant with respect to other modeling and commissioning standards being developed. TAL believes that in all practical sense, this must be accomplished in planning standards, which come into play during interconnection studies, model verification and validation processes and commissioning.	
Likes 0	
Dislikes 0	
Response	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Kera Schwartz - Southern Indiana Gas and Electric Co. - 2,3,4 - RF	
Answer	
Document Name	
Comment	
Southern Indiana Gas and Electric d/b/a CenterPoint Energy Indiana South (SIGE) supports EEl's comments on the revisions.	
Likes 0	
Dislikes 0	
Response	
Scott Thompson - TXNM Energy - 3	
Answer	
Document Name	

Comment	
Regional Entities may or may not have a list of acceptable and unacceptable models, how does the STD take into account certain unacceptable models vs acceptable per RE?	
Likes 0	
Dislikes 0	
Response	
Rommel Aquino - Edison International - Southern California Edison Company - 3	
Answer	
Document Name	Project 2022-02 _ EEI Final Draft Comments _ MOD-032 IRO-10 TOP-003 Draft 2_ Rev. 0i _ 9_05_2025.docx
Comment	
See comments submitted by the Edison Electric Institute	
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	
Ben Hammer - Western Area Power Administration - 1	
Answer	
Document Name	
Comment	

The currently proposed MOD-032-2 Standard does not clearly identify which generations assets the standard is applicable to. We suggest that the following clarifying addition be added to 4.1.3 of the Applicability section of MOD-032-2

4.1.3 Generator Owner – Category 1 and 2

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

Steven Taddeucci - NiSource - Northern Indiana Public Service Co. - 3

Answer

Document Name

Comment

NIPSCO recommends that the Attachment “Process for Updating the Unacceptable Models List Maintained by the Electric Reliability Organization (ERO)” be removed from the MOD-032 standard, and added instead to the ERO Unacceptable Models List document.

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 share comments and suggestions. ACES realizes this has been a huge undertaking and we appreciate all the time and effort the DT has put into executing the FERC 901 Directive under such a short timeframe.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

[2022-02_Unofficial_Comment_Form_Additional_Posting_NSRF v9.10.2025.docx](#)

Comment

The MRO NSRF encourages clear and consistent identification of which generation assets standards are applicable to. The currently proposed MOD-032-2 Reliability Standard Applicability Section does not clearly identify those entities. While we recognize the proposed definition of GO includes both Category 1 & 2, the MRO NSRF proposes that the following be added to 4.1.3 of the Applicability Section of MOD-032-2 (shown in boldface):

4.1.3 Generator Owner - **Category 1 and 2**

Likes 0

Dislikes 0

Response

Brittany Millard - Lincoln Electric System - 5

Answer

Document Name

Comment

R1.5.3 should be removed from TOP-003-8. Model submissions don't belong in the data spec.

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 agrees with the comments of the MRO NSRF. However, none of these concerns rise to the level of a negative ballot for MEC. Consideration and clarifications around the concerns expressed in the MRO NSRF comments would make for a better Reliability Standard if there is opportunity for substantive revisions.	
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	
Eric Sutlief - CMS Energy - Consumers Energy Company - 3,4,5 - RF	
Answer	
Document Name	
Comment	

DP’s likely do not have in-house expertise available to comply with providing dynamic models of aggregated DER resources; even estimated modeling when certified modeling is unavailable due to regulatory limitations. NERC and the drafting team should consider resource availability of the consultants who will be required to support DP’s in the new compliance obligation as implementation plans are determined.

Likes0

Dislikes0

Response

Wesley Yeomans - New York State Reliability Council - 10

Answer

Document Name

Comment

We do not agree that the TO is the appropriate entity for collecting and providing data for DER where there is no associated registered DP between the DER connection point and the TO’s system. In the NY area, the most appropriate entity would be the NYISO; this requirement should be moved to the BA/PC. The NYISO is in a better position to require entities to submit the required data when they join the market; individual TOs cannot. The NYISO has processes for maintaining the necessary system representation data to comply with FERC, NERC, NPCC, and NYSRC requirements.

Likes0

Dislikes0

Response