

Mapping Document Consideration of FERC Order 901 Directives

Project 2023-02 Unexpected Inverter-Based Resource Event Mitigation
July 2024

The Federal Energy Regulatory Commission (FERC) issued Order No. 901 on October 19, 2023, which includes directives on new or modified NERC Reliability Standard projects. Order No. 901 addresses a wide spectrum of reliability risks to the grid from the application of inverter-based resources (IBR); including both utility scale and behind the meter or distributed energy resources. Within the Order, there are four milestones that include sets of directives to NERC. The first milestone was achieved on January 17, 2024 as NERC filed its initial work plan to address all aspects of Order No. 901 throughout the next three years.¹ The filed work plan includes extensive detail on Standards Development approach and next steps to accomplish the suite of directives addressing IBR. The work plan was intended to be an initial roadmap to guide development for each of the Reliability Standards Projects identified as a 901-related project.

FERC Order 901 Directives

| Directive Language | Consideration of Directives |
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| <p>P58. 208 “Further, the Reliability Standards must require generator owners to communicate to the relevant planning coordinators, transmission planners, reliability coordinators, transmission operators, and balancing authorities the actual post-disturbance ramp rates and the ramp rates to meet expected dispatch levels (i.e., generation-load balance).”</p> | <p>The ERO will work with respective subject matter experts to develop a new reliability standard to have Generator Owners (GO) communicate Corrective Action Plans with Reliability Coordinators (RC), Balancing Authorities (BA), Transmission Operators (TOP) after a disturbance occurs.</p> |

¹ INFORMATIONAL FILING OF THE NORTH AMERICAN RELIABILITY CORPORATION REGARDING THE DEVELOPMENT OF RELIABILITY STANDARDS RESPONSIVE TO ORDER NO. 901; 01/17/2024; https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/NERC%20Compliance%20Filing%20Order%20No%20901%20Work%20Plan_packaged%20-%20public%20label.pdf

The drafting team addressed this directive in proposed PRC-030-1 through Requirements R1, R2, R3, and R4.

Requirement R1 requires GOs to implement a documented process to identify any complete facility loss of output or certain changes in Real Power output. Requirement R1 also includes exclusions to these identification measures.

Requirement R2 requires that GOs, within 90 calendars of identifying a Real Power change under Requirement R1 or a request from the applicable RC, BA, or TOP that identified a Disturbance and change in IBR Real Power output, to analyze IBR facility performance during the event, and, provide the analysis results to the requesting applicable RC, BA, or TOP.

Requirements R3 and R4 require the GO to develop a Corrective Action Plan (CAP), implement the CAP, and update the CAP if actions or timetables change. The GO will need to notify and provide the CAP, or the justification why no corrective actions are needed, to the applicable entity.