Unofficial Comment Form

Project 2020-06 Verification of Models and Data for Generators
Standard Authorization Request (SAR)

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on the **Project 2020-06 Verification of Models and Data for Generators SAR** by **8:00 p.m. Eastern, Wednesday, June 26, 2024.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2020_06-Verifications-of-Models-and-Data-for-Generators.aspx). If you have questions, contact Manager of Standard Developer, Jamie Calderon (via email), or at 404-960-0568.

## Background Information

FERC Order No. 901 – Milestone 3, Part 2: IBR Model Validation SAR addresses regulatory directives from NERC Standards Development Work Plan to respond to FERC Order No. 901. This SAR is intended to establish new or revised Reliability Standards to address FERC Order No. 901 directives related to modeling validation (and verification) activities by utilizing actual performance data, including performance of IBR performance during a disturbance. This will help ensure the facility’s model(s) reflect(s) the in-service equipment throughout the lifecycle of the IBR facility. NERC must file the Reliability Standards or definitions developed under Milestone 3 by November 4, 2025.

As this SAR includes anticipated revisions to model validation for IBR, NERC recommends it be assigned to Project 2020-06 Verifications of Models and Data for Generators. The drafting team will need to prioritize changes for this SAR over currently assigned SARs to remove IBR from MOD-026 and MOD-027 as this holistic approach includes some form of ongoing quality review and corrections based on new performance-based validation. This is necessary to prevent duplicative model validation requirements that do not align with the performance-based objectives of the regulatory directives. A second phase proposed by this SAR to incorporate the uniform model framework revisions into FAC-002 to assure a consistent holistic approach for model data sharing is established throughout the lifespan of IBR. As regulatory directives included within this SAR must be addressed in revisions to Reliability Standards that must be filed with FERC by November, 2025, NERC also recommends that this project remain prioritized as a High Priority project. No waivers to the Standard Processes Manual are being requested at this time.

At the July 21, 2021 meeting, the Standards Committee (SC) accepted the original SAR assigned to Project 2020-06 Verifications of Models and Data for Generators. The drafting team has only proposed revisions to MOD-026 at this time. The initial draft was posted May 20, 2022 through July 6, 2022. An additional draft was posted November 21, 2022 through January 18, 2023. Another additional draft was posted June 7, 2023 through July 21, 2023. The drafting team has also posted new definitions for IBRs to assure alignment between other 901-related projects. The drafting team will post one more draft of revisions before being assigned this SAR and moving forward with revisions.

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

## Questions

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

[ ]  Yes

[ ]  No

Comments:

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

[ ]  Yes

[ ]  No

Comments: