

May 29, 2025

Brian Evans-Mongeon (TAPS), Joe McClung (LPPC), Latif Nurani (APPA), and Bill Zuretti (EPSA)

To Whom It May Concern,

Thank you for submitting a Standard Authorization Request (SAR) dated May 17, 2024, titled IBR Registration and Standards Applicability Glossary Update.

Pursuant to Section 4.2 of the NERC Standard Processes Manual (SPM), Appendix 3A to the NERC Rules of Procedure, I write to inform you that on May 21, 2025, the Standards Committee (SC) reviewed and rejected the SAR submitted by NERC for good cause. The SAR was rejected on the grounds of insufficient stakeholder support and the purpose of the SAR has been or is addressed by the work of the following drafting teams:

- Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)
- Project 2022-02 Uniform Modeling Framework for IBR

For additional information on this matter, please see the attached background document and review this [link](#) to the comments received in response to the public SAR posting and the SAR itself. These documents were considered at the May 21, 2025 SC meeting.

Thank you for your continued support of the Standards Development process. I look forward to our future collaborations.

Sincerely,



Todd Bennett
Chair, NERC Standards Committee
tbennett@aeci.org

3353 Peachtree Road NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Project 2024-01 Rules of Procedure (ROP) Definitions Alignment (Generator Owner and Generator Operator)

Action

Reject the IBR Registration and Standards Applicability Glossary Update Standard Authorization Request (SAR), with a written response to the submitter.

Background

This project addresses the definitions for Generator Owner (GO) and Generator Operator (GOP) within the NERC Glossary of Terms to ensure the inclusion of Inverter-Based Resources (IBRs) on the bulk power system (BPS) that do not meet the current definition of Bulk Electric System (BES), but do meet registration criteria updated with the June 27, 2024 approved changes to the NERC ROP. *See Order Approving Revisions to the Rules of Procedure to Register Inverter Based Resources*, 187 FERC ¶ 61,196 (2024), [Docket No. RR24-2-000](#).

On May 15, 2024, the Standards Committee (SC) accepted the GO and GOP Definition Alignment SAR that was submitted by NERC staff to align the NERC Glossary of Terms definitions of GO and GOP with the revised definitions contained in the ROP registry criteria that were subsequently approved by FERC in June 2024. On January 22, 2025, the SC authorized drafting new or modified definitions as identified in the Generator Owner and Generator Operator Definition Alignment SAR. On March 19, 2025, the SC authorized the initial posting of modified definitions for GO and GOP and the associated Implementation Plan for a 45-day formal comment period from March 24, 2025, through May 7, 2025.

On July 17, 2024, the SC accepted an additional SAR submitted by industry stakeholders, the IBR Registration and Standards Applicability Glossary Update SAR, which was posted for a 35-day formal comment period, from August 13, 2024, through September 16, 2024. This SAR proposes that the Glossary definitions of Generator Owner and Generator Operator be revised to add the owners and operators of Sub-BES IBRs, consistent with the revised Registration Criteria. The SAR also proposes developing Glossary definitions for Non-Material IBRs and for IBR-Distributed Energy Resources (IBR-DERs) and should allow for ex-ante certainty regarding the compliance application of the definitions in the same way as the definition of Sub-BES IBRs.

The drafting team (DT) reviewed the IBR Registration and Standards Applicability Glossary Update SAR comments on March 11, 2025, and concluded that it had achieved the objective of the SAR through its proposed revisions to the GO and GOP definitions. The DT further determined that the definitions related to IBR-DER and other related non-BES IBRs are being addressed by Milestone 3 Project 2022-02 Uniform Modeling Framework for IBR. The Project 2024-01 DT chairs met with the Project 2022-02 Uniform Modeling Framework for IBR DT chairs to discuss overlap with Project 2022-02 which proposes to create a DER definition that includes distribution-connected IBRs. On April 1, 2025, the DT held a formal vote on the decision to recommend that the SC reject the SAR, with a 6 to 2 vote in favor of the rejection decision.

NERC Standard Processes Manual Section 4.2 SAR Posting provides as follows:

- The SC, once again considering the public comments received and their resolution, may then take one of the following actions:
 - Authorize drafting the proposed Reliability Standard or revisions to a Reliability Standard.
 - Reject the SAR with a written explanation to the sponsor and post that explanation.

Summary

NERC staff recommends that the SC reject the IBR Registration and Standards Applicability Glossary Update Standard Authorization Request SAR with a written response to the submitter.

Standard Authorization Request (SAR)

Complete and submit this form, with attachment(s) to the [NERC Help Desk](#). Upon entering the Captcha, please type in your contact information, and attach the SAR to your ticket. Once submitted, you will receive a confirmation number which you can use to track your request.

The North American Electric Reliability Corporation (NERC) welcomes suggestions to improve the reliability of the bulk power system through improved Reliability Standards.

Requested information			
SAR Title:		IBR Registration and Standards Applicability Glossary Update	
Date Submitted:		May 17, 2024	
SAR Requester			
Name:		Brian Evans-Mongeon (TAPS), Joe McClung (LPPC), Latif Nurani (APPA), Bill Zuretti (EPSA)	
Organization:		American Public Power Association, Electric Power Supply Association, Large Public Power Council, and Transmission Access Policy Study Group	
Telephone:		Email:	Inurani@publicpower.org bzuretti@epsa.org mcclja@jea.com bevans-mongeon@tapsgroup.org
SAR Type (Check as many as apply)			
<input type="checkbox"/> New Standard		<input type="checkbox"/> Imminent Action/ Confidential Issue (SPM Section 10)	
<input type="checkbox"/> Revision to Existing Standard		<input type="checkbox"/> Variance development or revision	
<input checked="" type="checkbox"/> Add, Modify or Retire a Glossary Term		<input type="checkbox"/> Other (Please specify)	
<input type="checkbox"/> Withdraw/retire an Existing Standard			
Justification for this proposed standard development project (Check all that apply to help NERC prioritize development)			
<input checked="" type="checkbox"/> Regulatory Initiation		<input type="checkbox"/> NERC Standing Committee Identified	
<input type="checkbox"/> Emerging Risk (Reliability Issues Steering Committee) Identified		<input type="checkbox"/> Enhanced Periodic Review Initiated	
<input type="checkbox"/> Reliability Standard Development Plan		<input checked="" type="checkbox"/> Industry Stakeholder Identified	
What is the risk to the Bulk Electric System (What Bulk Electric System (BES) reliability benefit does the proposed project provide?):			
FERC in the IBR Registration Order found that BPS-connected inverter-based resources (IBR) that do not meet the Bulk Electric System (BES) definition can have an aggregate material impact on Bulk Power System (BPS) reliability, and the owners and operators of such resources must therefore be registered and subject to NERC reliability standards. NERC has updated the Rules of Procedure (ROP) to allow for registration of the owners and operators of non-BES IBR aggregations of at least 20 MVA, connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV ("Category 2" GOs and GOPs); these ROP changes are pending			

Requested information

before FERC. FERC's Order 901 directives with respect to "registered IBRs" apply to both BES IBR facilities and those non-BES IBR facilities that meet the revised Registry Criteria thresholds. *See, e.g.,* Order 901 P 4 n.14. Order 901 also includes directives with respect to BPS-connected IBRs that do not meet the registration thresholds (which Order 901 refers to as "unregistered IBRs") and "IBR-DERs," i.e., distribution-connected IBRs.

To comply with Order 901's directives that both BES IBR facilities and the non-BES IBR facilities that meet the revised Registry Criteria thresholds be subject to particular standards, Standard Drafting Teams (SDTs) must be able to refer clearly to these sets of facilities in drafting standards. "BES" is already a Glossary-defined term, and a definition of "Inverter-Based Resource" is being developed, so an SDT can refer to "BES IBRs" in the facilities Applicability section of a standard and/or in particular requirements, as appropriate; no additional work is therefore needed to define BES IBRs. But there is no corresponding term for non-BES IBRs that meet the revised Registry Criteria thresholds. There is a similar need for defined terms for BPS-connected IBRs that do not meet the revised Registry Criteria thresholds and for distribution-connected IBRs.

In addition, in order to subject all "registered IBRs" to appropriate standards consistent with Order 901, the Glossary definitions of Generator Owner (GO) and Generator Operator (GOP) must be expanded to add Category 2 GOs and GOPs.¹

Defined terms for (a) non-BES IBRs that meet the revised Registry Criteria thresholds, (b) BPS-connected IBRs that fall below the revised Registry Criteria thresholds, and (c) distribution-connected IBRs are needed to avoid confusion and delay in standards development—including Order 901 compliance—and to allow the standards to provide clarity to registered entities and enforcers regarding each standard's facilities applicability. The risk of confusion and delay is not speculative: in the absence of a defined term for non-BES IBRs that meet the revised Registry Criteria thresholds (referred to for convenience as "Sub-BES IBRs," though the SDT is free to consider an alternative term), SDTs working on Order 901 compliance projects have resorted to vague facilities applicability terms such as "BPS IBRs." Similar confusion is to be expected once work begins on the standards involving BPS-connected IBRs that fall below the revised Registry Criteria thresholds (referred to for convenience as "Non-Material IBRs," again without limiting the SDT's ability to consider an alternative term) and distribution-connected IBRs (referred to for convenience as "IBR-DERs"). There are several significant negative consequences:

1. Because ballot pool members are aware of the problems inherent in unclear standards applicability, draft standards with vague applicability terms are likely to be voted down. The Order 901 compliance deadlines and the pressing reliability need to address IBR-specific risks are such that we cannot afford to waste time on unnecessary failed ballots. SDTs and ballot pool members should be able to focus on more substantive technical issues, rather than being distracted by drafting challenges.

¹ It is, of course, also necessary to revise existing standards themselves to apply to Category 2 GO/GOPs and to those non-BES IBR facilities that meet the revised Registry Criteria thresholds, but that work is within the scope of existing Order 901 compliance standards development projects, and not proposed as part of this SAR.

Requested information

2. Absent a clear and consistent statement of applicability that is used consistently throughout a proposed standard (and across related standards), there is an increased risk that FERC would reject the standard as overly vague and noncompliant with Order 901.
3. Finally, if a standard with such vague applicability were approved by FERC and allowed to go into effect, registered entities would not know which facilities are subject to the standard, or which entities have responsibilities with respect to each facility, leading to both reliability risks and unreasonable compliance risks.
 - a. An entity may be registered as a Category 2 GO/GOP based initially on one facility, but own or subsequently acquire another facility whose status vis a vis revised Registry Criteria thresholds is less clear.
 - b. Pursuant to Order 901, the owners and operators of IBRs that meet the criteria for owner/operator registration must be required to “provide IBR-specific modeling data and parameters . . . that accurately represent the registered IBRs to their [PCs], [TPs], [RCs], [TOPs], and [BAs] that are responsible for planning and operating the [BPS]” (P 76). In the case of IBR facilities that do *not* meet the thresholds for owner/operator registration, however—even if the facility is owned/operated by a registered GO/GOP—the interconnecting TO or DP, not the GO/GOP, is to be the entity responsible for providing data to system planners and operators. *Id.* P 107.
 - i. If an IBR facility’s status is unclear, it may “fall through the cracks,” with its data being reported by neither its GO/GOP owner/operator nor its interconnecting TO or DP. Alternatively, the facility could be double counted if both entities report it.
 - c. This lack of clarity results in inappropriate compliance risk for GO/GOPs, and (for data and modeling standards) TOs and DPs, as these entities will not know with certainty which facilities they must be able to demonstrate compliance for.

As explained in more detail in the “Purpose or Goal” section, the risks described above would be significantly lessened by the creation of Glossary definitions for Sub-BES IBRs, Non-Material IBRs, and IBR-DERs.

Any standard or definition carries some risk of ambiguity and need for interpretation. But given the fundamental nature of the question here—whether or not a facility is subject to the suite of Order 901 “registered IBR” standards, and which registered entity is responsible for providing data and models with respect to the facility—a failure to have a consistent understanding of each facility’s status would be particularly damaging, leading to reliability risk (double-counting, under-counting, etc.) and undue compliance risk. Having a clear definition as described above is vital in mitigating these risks, but to ensure a common understanding and more fully mitigate the risk, it would be worthwhile for the SDT to not only define the three sets of non-BES IBRs, but also go another step by providing *ex ante* clarity to affected registered entities and CMEP staff regarding which facilities meet each new definition.

Because the first set of standards dealing with Category 2 GO/GOPs and Sub-BES IBRs must be submitted to FERC by November 4, 2024, while standards affecting the other two sets of IBRs are due in November 2025, it is proposed that this project take place in two phases, so that revisions to the GO/GOP definitions

Requested information

and the new defined term for Sub-BES IBRs can be developed on an expedited timeline, followed by Phase 2 addressing BPS-connected IBRs that fall below the revised Registry Criteria thresholds and IBR-DERs.

Purpose or Goal (What are the reliability gap(s) or risk(s) to the Bulk Electric System being addressed, and how does this proposed project provide the reliability-related benefit described above?):

To facilitate standards drafting and clarify standards applicability, Phase 1 of the proposed project should develop a definition of Sub-BES IBRs. (As noted above, the SDT is free to consider another term instead). SDTs working on Order 901 compliance projects or other standards development projects would then be able to use the Sub-BES IBR definition in standards; for example, a Facilities Applicability section could state that the standard applies to “BES IBRs and Sub-BES IBRs”; a requirement could state that a GO should take a certain action with respect to each BES IBR and Sub-BES IBR that it owns.

In developing a definition of Sub-BES IBRs, the SDT should attempt to provide affected registered entities and CMEP staff with ex ante certainty regarding which IBR facilities qualify as Sub-BES IBRs. This could be done within the Glossary definition itself or via a new or revised Reliability Standard; and/or, if necessary, via recommending changes to NERC’s Rules of Procedure.

1. For example, rather than simply setting out the thresholds, the Glossary definition could be based on whether there has been a written determination by the applicable Regional Entity that a facility meets the thresholds (e.g., “As determined by the Regional Entity in written notice transmitted to the entity(ies) that own(s) the facility at the time the determination is made, non-BES inverter-based generating resources that aggregate to a total nameplate capacity of greater than or equal to 20 MVA, connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV.”)
 - a. Alternatively, to avoid overburdening Regional Entities, the definition could track the process set out for BES determinations, in which “in the absence of bad faith, if a registered entity applies the [BES] definition and determines that an element no longer qualifies as part of the [BES], upon notifying the appropriate Regional Entity that the element is no longer part of the [BES] the element should not be treated as part of the [BES] unless NERC makes a contrary determination in the exception process.” FERC Order 773-A P 110.
 - b. Either of these approaches would likely require changes to Appendix 5C of NERC’s Rules of Procedure to make the BES Exceptions Process applicable to determinations of Sub-BES IBR status.
2. Alternatively, a Reliability Standard approach could be modeled on the CIP-002 approach to BES Cyber System categorization.

Phase 1 of the proposed project should also update the Glossary definitions of Generator Owner and Generator Operator to add the owners and operators of Sub-BES IBRs, consistent with the revised Registration Criteria. The challenge, however, is that expanding the GO and GOP categories—which are already subject to existing standards—in this manner will subject newly-registered “Category 2” GOs and GOPs to the full set of GO/GOP standards (although such entities may not own/operate any facilities to

Requested information

which some GO/GOP standards apply).² Section 5.1 of the Standard Processes Manual requires that “If a term has already been defined, any proposal to modify or delete that term shall consider all uses of the definition in approved Reliability Standards, with a goal of determining whether the proposed modification is acceptable, and whether the proposed modification would change the scope or intent of any approved Reliability Standards.” It goes on to state that “[a]ny definition that is balloted separately from a proposed new or modified Reliability Standard or from a proposal for retirement of a Reliability Standard shall be accompanied by an implementation plan.” Accordingly, the SDT must consider the impact of the expansion of the GO and GOP definitions on each existing standard that applies to GO and/or GOP and must propose an appropriate implementation plan in light of those impacts. If the SDT determines that the expansion of the definitions of GO and/or GOP would inappropriately expand the applicability of a particular standard, the SDT should propose changes to the standard(s) at issue or, if the standard at issue is being revised by another drafting team in compliance with Order 901, should publicly notify the applicable SDT of its recommendation and account in its implementation plan for the time needed for such additional standards revisions.³

Phase 2 of the project should develop Glossary definitions for Non-Material IBRs and for IBR-DERs, and should allow for *ex ante* certainty regarding the application of the definitions in the same way as the definition of Sub-BES IBRs. In order to comply with Order 901’s differing directives regarding Non-Material (BPS-connected) IBRs and IBR-DERs, the SDT will need to attempt to distinguish between “BPS-connected” and “distribution connected” IBRs. Consistent with the Category 2 GO/GOP registration thresholds, 60 kV may be a reasonable place to draw the line. But because “Bulk Power System” and “local distribution” are both statutory terms affecting FERC’s jurisdiction, it will likely be necessary to account for the possibility of case-by-case jurisdictional determinations by FERC, similar to FERC “local distribution” determinations in the context of the BES definition.

Neither phase of this project is intended to result in any registered entity being subject to compliance with respect to Non-Material IBRs or IBR-DERs, although other standards projects are expected to use the definitions developed by this project in developing standards to apply to data and models of such facilities.

² As discussed below, NERC Staff has submitted a draft SAR to revise the GO/GOP Glossary definitions (“NERC Staff SAR”), and it is requested that this SAR be assigned to the same Standard Drafting Team as the NERC Staff SAR. The NERC Staff SAR includes an initial list of standards that may become applicable to Category 2 GOs and/or GOPs and to their non-BES facilities as a result of the expansion of the GO/GOP definitions. It will of course be necessary for the SDT to perform an independent review, using the SAR list as a starting point.

³ For example, as noted above, Order 901 directs that where “unregistered IBRs” and IBR-DERs are owned/operated by a registered GO/GOP, the interconnecting TO or DP, not the registered owner/operator, should be responsible for providing data regarding the unregistered IBRs and IBR-DERs. The SDT may determine that in the absence of additional changes to MOD-032, TOP-003, and/or IRO-010, the expansion of the GO/GOP categories would result in those standards being interpreted to require registered GO/GOPs to provide data on *all* of their non-BES generation, contrary to Order 901’s directive. See [February 2024 Board of Trustees Agenda Package](#), pdf p. 275, stating that expansion of the GO/GOP categories will make “IRO-010 and TOP-003 applicable with Glossary update without further revision.” Because TOP-003-5 Requirements R3-R5 and IRO-010-3 do not include explicit facilities applicability, if they are interpreted to apply to *some* non-BES facilities (i.e., those IBR aggregations that meet the revised Registry Criteria thresholds), it is unclear why they would not apply to *all* non-BES generation, including IBR aggregations that do not meet the revised thresholds and non-BES synchronous generation.

Requested information

Project Scope (Define the parameters of the proposed project):

Phase 1:

1. Reduce potential for confusion regarding applicability of standards to non-BES IBRs:
 - a. Develop a definition for Sub-BES IBRs, i.e., non-BES IBR aggregations meeting the Registry Criteria thresholds. If the SDT determines that another approach (a different Glossary term and/or Reliability Standards revisions) would more effectively provide clarity and transparency regarding non-BES IBR standards applicability in standards drafting and compliance, the SDT may pursue that alternative approach instead of or in addition to defining Sub-BES IBRs.
 - b. If possible (either in the Glossary definition itself or via a new or revised Reliability Standard, or, if necessary, via a recommended change to NERC's Rules of Procedure), provide for ex ante certainty regarding which IBR facilities are Sub-BES IBRs.
2. Update GO/GOP definitions:
 - a. Update the Glossary definitions of Generator Owner and Generator Operator to add the owners and operators of Sub-BES IBRs. (In the drafting team's discretion, in light of the time available and the team's judgment of the potential for controversy, the Glossary definitions may either (i) be made verbatim identical to the revised ROP definitions or (ii) incorporate the defined term "Sub-BES IBRs," or other equivalent term developed by the SDT to refer to the facilities that meet the revised Registry Criteria thresholds.)
 - b. Propose an appropriate implementation plan for the revised GO/GOP definitions.
 - c. The SDT should ensure that expansion of the GO/GOP definitions does not result in an inappropriate expansion of the facilities applicability of any existing standard. If necessary to avoid such an unintended consequence, the SDT should propose appropriate revisions to the standard(s) at issue or, if the standard is being revised by another project in compliance with Order 901, recommend such changes to the applicable SDT and account in its implementation plan for the time needed for the additional standards revisions.
 - d. This project is *not* intended to determine appropriate thresholds, because proposed thresholds are pending before FERC in the form of the revised Registration Criteria. To the extent that FERC directs changes to the proposed thresholds, this drafting team should incorporate those changes into its proposal.

Phase 2:

1. Reduce potential for confusion regarding applicability of standards to non-BES IBRs
 - a. Develop definitions for (i) Non-Material IBRs, i.e., BPS-connected IBRs that do not meet the revised Registry Criteria thresholds, and (ii) IBR-DERs, i.e., distribution-connected IBRs. If the SDT determines that another approach (different Glossary term(s) and/or Reliability Standards revisions) would more effectively provide clarity and transparency regarding non-BES IBR standards applicability in standards drafting and compliance, the SDT may pursue that alternative approach instead of or in addition to defining Non-Material IBRs and IBR-DERs.
 - b. If possible (either in the Glossary definition itself or via a new or revised Reliability Standard, or, if necessary, via a recommended change to NERC's Rules of Procedure),

Requested information

provide for ex ante certainty regarding whether a given non-BES IBR facility is a Sub-BES IBR, Non-Material IBR, or IBR-DER.

Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to execute the project. If you propose a new or substantially revised Reliability Standard or definition, provide: (1) a technical justification⁴ of developing a new or revised Reliability Standard or definition, which includes a discussion of the risk and impact to reliability-of the BES, and (2) a technical foundation document (e.g., research paper) to guide development of the Standard or definition):

1. The deliverables *must* include Glossary definitions of (a) IBR facilities that meet the new registration thresholds, (b) BPS-connected IBR facilities that fall below the new registration thresholds, and (c) distribution-connected IBRs (or other approach that addresses the problem of confusion regarding standards applicability to such classes of IBR facilities).
2. The deliverables *must* also include revisions to the Glossary definitions of GO and GOP to add the owners and operators of Sub-BES IBRs, with an appropriate implementation plan.
3. If possible, the deliverables *should* also include (via text in the proposed Glossary definition or a new/revised standard) some means of providing ex ante certainty regarding which non-BES IBR facilities meet each new definition.
4. *If necessary*, the deliverables *must* include revisions to affected standards to avoid inappropriate changes to standards applicability as a result of the expansion of the GO/GOP definitions, or recommendations that another pending project make such revisions.

Technical foundation documents include (or will include):

1. [IBR Registration Order](#)
2. [Order 901](#)
3. FERC order on revisions to Statement of Compliance Registry Criteria (not yet issued as of the date of submission of this draft SAR)

Subject to the binding nature of FERC orders, including Order 901, it is the SDT's responsibility to exercise its independent judgment regarding (a) the impact on standards applicability of expanding the GO/GOP definitions and (b) whether, and if so, on what implementation timeframe, any impacted standards *should* apply to Category 2 GO/GOPs and Sub-BES IBRs.

Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):

Adding newly registered "Category 2" GOs and GOPs to the Glossary definitions of GO and GOP is necessary for compliance with the IBR Registration Order and Order 901, which do not include cost estimates. However, the approach proposed in this SAR would minimize the confusion associated with complying with FERC's directives and thus minimize the burden on registered entities and the ERO.

⁴ The NERC Rules of Procedure require a technical justification for new or substantially revised Reliability Standards. Please attach pertinent information to this form before submittal to NERC.

Requested information
Similarly, the addition of defined terms for each of Order 901's three classes of non-BES IBR facilities will simplify standards drafting (including in response to Order 901 directives) and registered entity compliance with the resulting standards, decreasing the costs and risks associated with those activities.
Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):
<p>No BES facilities will be impacted by the proposed project; by design, the proposed project will address only <i>non</i>-BES IBR facilities.</p> <p>Unique characteristics of impacted facilities:</p> <ul style="list-style-type: none"> • Many Sub-BES IBRs, Non-Material IBRs, and IBR-DERs are dispersed and/or variable. • Affected resources may include hybrid aggregations, including: <ul style="list-style-type: none"> ○ IBR/IBR (e.g., solar/battery storage) hybrids; and ○ the IBR portion of IBR/non-IBR (e.g., gas/battery storage) hybrids.
To assist the NERC Standards Committee in appointing a drafting team with the appropriate members, please indicate to which Functional Entities the proposed standard(s) should apply (e.g., Transmission Operator, Reliability Coordinator, etc. See the NERC Rules of Procedure Appendix 5A:
Glossary terms will directly affect GOs and GOPs and will affect the compliance responsibilities of TOs and DPs.
Do you know of any consensus building activities ⁵ in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.
This proposal has been vetted by several trade associations and their members and revised and improved based on discussions with those entities. The most significant improvement resulting from those discussions is the addition of the proposal to develop definitions of Non-Material IBRs and IBR-DERs.
Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so, which standard(s) or project number(s)?
As noted above, NERC Staff has submitted a draft SAR to revise the GO/GOP Glossary definitions ("NERC Staff SAR"). We request that the Standards Committee assign this SAR to the same SDT as the NERC Staff SAR, and that the SDT merge the two SARs. As discussed above, development of defined terms for Sub-BES IBRs, Non-Material IBRs, and IBR-DERs is both necessary and urgent. And given the very close relationship between the proposed new IBR facilities definitions and the proposed revisions to the GO/GOP entity definitions, it would be most efficient for these efforts to be handled as a single project. Assigning the two SARs to the same SDT and merging them will eliminate the need for coordination between two separate SDTs, saving time and significantly reducing the potential for conflicting proposals.

⁵ Consensus building activities are occasionally conducted by NERC and/or project review teams. They typically are conducted to obtain industry inputs prior to proposing any standard development project to revise, or develop a standard or definition.

Requested information

Part of the SDT's responsibilities will include reviewing all standards applicable to GOs and GOPs to determine the appropriate implementation period(s) for the expansion of the definitions of GO and GOP. Affected standards likely include, among others, IRO-010, MOD-032, and TOP-003.

Affected projects may include the following Order 901 compliance projects:

2020-02 Modifications to PRC-024 (Generator Ride-through);
2020-06 Verifications of Models and Data for Generators;
2021-04 Modifications to PRC-002-2;
2023-02 Analysis and Mitigation of BES Inverter-Based Resource Performance Issues;
2021-01 Modifications to MOD-025 and PRC-019;
2023-01 EOP-004 IBR Event Reporting;
2021-02 Modifications to VAR-002-4.1;
2022-02 Modifications to TPL-001-5.1 and MOD-032-1;
2022-04 EMT Modeling; and
2023-05 Modifications to FAC-001 and FAC-002.

Are there alternatives (e.g., guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives with the benefits of using them.

A somewhat lower-effort approach would be to adopt the new Rules of Procedure definitions of GO and GOP into the Glossary, *without* developing defined terms for Order 901's three classes of non-BES IBR facilities. Such an approach is incomplete, however, because (a) by omitting development of defined terms for affected IBR facilities, the alternative approach would fail to remedy the significant existing confusion in standards drafting, and significant potential confusion in standards compliance, regarding such facilities; and (b) the alternative approach would not avoid the most resource-intensive aspect of the project: the need for the SDT to review all standards affected by the expansion of the GO and GOP definitions (i.e., all standards applicable to GO and/or GOP) and develop an appropriate implementation plan.

Reliability Principles

Does this proposed standard development project support at least one of the following Reliability Principles ([Reliability Interface Principles](#))? Please check all those that apply.

<input type="checkbox"/>	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input type="checkbox"/>	2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input checked="" type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.
<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.

Reliability Principles	
<input type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
<input type="checkbox"/>	8. Bulk power systems shall be protected from malicious physical or cyber attacks.

Market Interface Principles	
Does the proposed standard development project comply with all of the following Market Interface Principles ?	Enter (yes/no)
1. A reliability standard shall not give any market participant an unfair competitive advantage.	Yes
2. A reliability standard shall neither mandate nor prohibit any specific market structure.	Yes
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard.	Yes
4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards.	Yes

Identified Existing or Potential Regional or Interconnection Variances	
Region(s)/ Interconnection	Explanation
e.g., NPCC	

For Use by NERC Only

SAR Status Tracking (Check off as appropriate).	
<input type="checkbox"/> Draft SAR reviewed by NERC Staff	<input type="checkbox"/> Final SAR endorsed by the SC
<input type="checkbox"/> Draft SAR presented to SC for acceptance	<input type="checkbox"/> SAR assigned a Standards Project by NERC
<input type="checkbox"/> DRAFT SAR approved for posting by the SC	<input type="checkbox"/> SAR denied or proposed as Guidance document
Risk Tracking.	
<input type="checkbox"/> Grid Transformation	<input type="checkbox"/> Energy Policy
<input type="checkbox"/> Resilience/Extreme Events	<input type="checkbox"/> Critical Infrastructure Interdependencies
<input type="checkbox"/> Security Risks	

Version History

Version	Date	Owner	Change Tracking
1	June 3, 2013		Revised
1	August 29, 2014	Standards Information Staff	Updated template
2	January 18, 2017	Standards Information Staff	Revised
2	June 28, 2017	Standards Information Staff	Updated template
3	February 22, 2019	Standards Information Staff	Added instructions to submit via Help Desk
4	February 25, 2020	Standards Information Staff	Updated template footer
5	August 14, 2023	Standards Development Staff	Updated template as part of Standards Process Stakeholder Engagement Group