

Project 2021-04 Modifications to Disturbance Monitoring and Reporting Requirements

Action

- Approve the following waiver of provisions of the Standard Processes Manual (SPM) for Project 2021-04:
 - Additional formal comment and ballot period (s) reduced from 45 days to as little as 15 days, with ballot conducted during the last 10 days of the comment period. (Sections 4.9 and 4.12)
 - Final ballot reduced from 10 days to 5 calendar days. (Section 4.9)

Background

The Project 2021-04 drafting team (DT) was charged with addressing two Standard Authorization Requests (SARs) related to PRC-002, to be addressed in two separate phases. The first SAR was submitted by Glencoe Light, who sought clarification of notifications and data requirements. The second SAR was submitted by the NERC Inverter-based Resource Performance Task Force (IRPTF). In its March 2020 white paper, *IRPTF Review of NERC Reliability Standards White Paper*, the IRPTF identified issues with PRC-002-2 that should be addressed.

At the Standards Committee (SC) January 20, 2021 meeting, the SC accepted both PRC-002 SARs referenced above and authorized soliciting for members for the DT. At the September 23, 2021 meeting, the SC appointed chair, vice chair, and members to the Project 2021-04 Modifications to PRC-002 DT. At its January 19, 2022 meeting, the SC accepted the revised SARs, authorized drafting revisions to the Reliability Standards identified in the SARs and appointed the SAR DT as the project DT.

The DT completed the first phase of work to address the Glencoe Light SAR in winter 2023 with the development of Reliability Standard PRC-002-4.

After much debate, the DT strongly believes that to address the needs identified in the IRPTF SAR, a new standard for monitoring requirements for Inverter-Based Resources (IBRs) should be created instead of revising PRC-002. As such, the DT submitted a revised SAR for SC approval on April 19, 2023. At that meeting, SC authorized drafting revisions to the Reliability Standards identified in the SAR, i.e., to create a new standard (PRC-028-1) to address needs identified in the IRPTF SAR and to make minor revisions to PRC-002 as necessary to align with the new standard.

NERC Standard Processes Manual Section 16.0 Waiver provides as follows:

The SC may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:

- In response to a national emergency declared by the United States or Canadian government that involves the reliability of the Bulk Electric System (BES) or cyber attack on the BES;
- Where necessary to meet regulatory deadlines;

- Where necessary to meet deadlines imposed by the NERC Board of Trustees; or
- Where the SC determines that a modification to a proposed Reliability Standard or its requirement(s), a modification to a defined term, a modification to an Interpretation, or a modification to a variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

FERC Order 901 directs the development of new or modified reliability standards, including new requirements for disturbance monitoring, data sharing, post-event performance validation, and correction of IBR performance. This set of directives from the report comprises the first of three sets of Standards Projects that must be completed and filed with FERC. This first set (disturbance monitoring data sharing and post-event performance validation and correction of IBR performance) must be filed with FERC by November 4, 2024.

NERC Standards Development has identified three active projects (2020-02, 2021-04, and 2023-02) that are directly impacted by these associated FERC directives. Project 2021-04 DT leadership and NERC staff request that the SC approve a waiver for certain provisions of the SPM regarding the length of comment periods and ballots in order to meet the November 2024 development deadline for 2021-04 as established by FERC.

Summary

Project 2021-04 DT leadership and NERC staff recommend that the SC shorten additional formal comment and ballot period(s) from 45 days to as few as 15 days. NERC staff is only recommending this reduction for additional comment and ballot period(s) because initial ballot was completed August 1 – September 14, 2023. In addition, Project 2021-04 DT leadership and NERC staff recommend that the final ballot be shortened from 10 days to 5 days.