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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 GOP).

As discussed more fully in this filing, NERC developed the proposed revisions to the Generator Owner and Generator Operator definitions in the NERC Glossary through Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator). The primary purpose of this project was to align the definitions of the Generator Owner and Generator Operator terms in the NERC Glossary with the recently revised Generator Owner and Generator Operator registration functions in the NERC Rules of Procedure Statement of Compliance Registry Criteria,⁵ approved by the Commission on June 27, 2024.⁶

Under the revised Registry Criteria, owners and operators of non-Bulk Electric System (“BES”) Inverter-Based Resources (“IBR”) that individually or collectively have an aggregate 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 will meet the “Category 2” criteria and be required to register with NERC as Generator Owner or Generator Operator, as applicable. The proposed revised definitions of Generator Owner and Generator Operator would carry these Commission-approved changes forward in the NERC Glossary and thereby the Reliability Standards in which these terms are used.

Collectively, the approved revisions to the Registry Criteria, the proposed revisions to the NERC Glossary definitions of Generator Owner and Generator Operator, and the implementation plan for the proposed definitions would ensure that owners and operators of IBRs on the Bulk-

⁵ The NERC Rules of Procedure, Appendix 5B, Statement of Compliance Registry Criteria, available at https://www.nerc.com/AboutNERC/RulesOfProcedure/Appendix%205B%20eff%2020240627_signed.pdf [hereinafter Registry Criteria].

⁶ *Order Approving Revisions to North American Electric Reliability Corporation Rules of Procedure and Requiring Compliance Filing*, 187 FERC ¶ 61,196 (2024) [hereinafter Registry Criteria Approval Order].

Power System (“BPS”) that are below the BES threshold but still have a material impact on BPS reliability will be registered and required to comply with applicable Reliability Standards by May 2026, in accordance with the relevant Commission orders.⁷ This will enhance reliability of the BPS by addressing the growing impacts associated with the transforming resource mix and increasing integration of IBRs.⁸

The proposed definitions were developed through NERC’s Commission-approved standard development process. NERC Board of Trustees adopted the proposed Generator Owner and Generator Operator definitions on August 14, 2025.

NERC requests that the Commission approve the proposed Generator Owner and Generator Operator definitions, as shown in **Exhibit A**, as just, reasonable, not unduly discriminatory or preferential, and in the public interest. NERC also requests that the Commission approve the proposed implementation plan (**Exhibit B**), under which the proposed Generator Owner and Generator Operator definitions would become effective on the first day of the first calendar quarter following regulatory approval. Eight Reliability Standards would become applicable to Generator Owners and Generator Operators with IBRs meeting the Category 2 criteria on May 15, 2026.

As required by Section 39.5(a)⁹ of the Commission’s regulations, this petition presents the technical basis and purpose of the proposed Generator Owner and Generator Operator definitions, along with relevant background (**Sections II and III**), a demonstration that the proposed

⁷ See e.g., *Registration of Inverter-Based Resources*, 181 FERC ¶ 61,124 (2022) [hereinafter *IBR Registration Order*]; *Order Approving Registration Work Plan*, 183 FERC ¶ 61,116 (2023) [hereinafter *Work Plan Approval Order*].

⁸ NERC, *Inverter-Based Resource Strategy: Ensuring Reliability of the Bulk Power System with Increased Levels of BPS-Connected IBRs* (June 2022), https://www.nerc.com/comm/Documents/NERC_IBR_Strategy.pdf.

⁹ 18 C.F.R. § 39.5(a).

definitions meet the criteria identified by the Commission in Order No. 672¹⁰ (**Exhibit C**), and a summary of the development history for the proposed definitions (**Exhibit D**).

I. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the following:¹¹

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II. BACKGROUND

A. Regulatory Framework

By enacting the Energy Policy Act of 2005,¹² Congress entrusted the Commission with the duties of approving and enforcing rules to ensure the reliability of the Bulk-Power System (“BPS”), and with the duties of certifying an ERO that would be charged with developing and enforcing mandatory Reliability Standards, subject to Commission approval. Section 215(b)(1)¹³

¹⁰ The Commission specified in Order No. 672 certain general factors it would consider when assessing whether a particular Reliability Standard is just and reasonable. *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards*, Order No. 672, 114 FERC ¶ 61,104, at P 262, 321-37 [hereinafter Order No. 672], *order on reh’g*, Order No. 672-A, 114 FERC ¶ 61,328 (2006).

¹¹ NERC requests waiver of 18 C.F.R. § 385.203(b) to permit the inclusion of more than two people on the service list.

¹² 16 U.S.C. § 824o.

¹³ *Id.* § 824o(b)(1).

of the FPA states that all users, owners, and operators of the BPS in the United States will be subject to Commission-approved Reliability Standards. Section 215(d)(5)¹⁴ of the FPA authorizes the Commission to order the ERO to submit a new or modified Reliability Standard. Section 39.5(a)¹⁵ of the Commission's regulations requires the ERO to file with the Commission for its approval each new Reliability Standard that the ERO proposes should become mandatory and enforceable in the United States, and each modification to a Reliability Standard that the ERO proposes should be made effective.

The Commission is vested with the regulatory responsibility to approve Reliability Standards that protect the reliability of the BPS and to ensure that Reliability Standards are just, reasonable, not unduly discriminatory or preferential, and in the public interest. Pursuant to Section 215(d)(2) of the FPA¹⁶ and Section 39.5(c)¹⁷ of the Commission's regulations, the Commission will give due weight to the technical expertise of the ERO with respect to the content of a Reliability Standard.

B. NERC Reliability Standards Development Procedure

NERC develops Reliability Standards and definitions of terms used in Reliability Standards in accordance with Section 300 (Reliability Standards Development) of its Rules of Procedure and the NERC Standard Processes Manual.¹⁸ In its order certifying NERC as the Commission's ERO, the Commission found that NERC's rules provide for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests in developing

¹⁴ *Id.* § 824o(d)(5).

¹⁵ 18 C.F.R. § 39.5(a).

¹⁶ 16 U.S.C. § 824o(d)(2).

¹⁷ 18 C.F.R. § 39.5(c)(1).

¹⁸ The NERC Rules of Procedure, including Appendix 3A, NERC Standard Processes Manual, are available at <https://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>.

Reliability Standards,¹⁹ and thus satisfy several of the Commission’s approval criteria.²⁰ The development process is open to any person or entity with a legitimate interest in the reliability of the BPS. NERC considers the comments of all stakeholders. Stakeholders must approve, and the NERC Board of Trustees must adopt, a new or revised Reliability Standard or definition before NERC submits the Reliability Standard or definition to the Commission for approval.

C. *Glossary of Terms used in NERC Reliability Standards*

NERC maintains a comprehensive, up-to-date document on its web site that reflects all defined terms used in Reliability Standards that have been adopted by the NERC Board of Trustees: the *Glossary of Terms used in NERC Reliability Standards* (“Glossary” or “NERC Glossary”). The NERC Glossary reflects the status of Commission approval and effective dates and contains links to the archive of the development of each definition. In Order No. 693²¹ approving the first mandatory and enforceable Reliability Standards and defined terms, the Commission highlighted the role the NERC Glossary plays in promoting a consistent and clear understanding of terms used throughout the Reliability Standards:

The terms defined in the glossary have an important role in establishing consistent understanding of the Reliability Standards Requirements and implementation. The approval of the glossary will provide continuity in application of the glossary definitions industry-wide, and will eliminate multiple interpretations of the same term or function, which may otherwise create miscommunication and jeopardize Bulk-Power System reliability.²²

¹⁹ *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062 at P 250 (2006).

²⁰ Order No. 672 at PP 268, 270.

²¹ *Mandatory Reliability Standards for the Bulk-Power System*, Order No. 693, 118 FERC ¶ 61,218 (2007) [hereinafter Order No. 693].

²² *Id.* at P 1893.

The Commission further stated, “The glossary should be updated through the Reliability Standards development process whenever a new or revised Reliability Standard that includes a new defined term is approved, or as needed to clarify compliance activities.”²³

Since the NERC Glossary was first approved in 2007, the Commission has approved new defined terms and revisions to the definitions of existing terms developed through the standard development process, as well as the retirement of previously effective terms and definitions. While defined terms typically accompany the new or revised Reliability Standards that will use those terms, NERC has on occasion proposed new or revised defined terms independent of a proposed Reliability Standard.²⁴

D. Development of the Proposed Generator Owner and Generator Operator Definitions

The Commission first approved definitions for the terms Generator Operator and Generator Owner in 2007 in Order No. 693.²⁵ In 2016, the Commission approved the current Glossary definitions of Generator Operator and Generator Owner.²⁶ NERC developed the current definitions to align with changes to the definitions of those terms in the Registry Criteria that the Commission approved as part of NERC’s 2014 Risk-based Registration Initiative.²⁷ Specifically, the current definitions were revised to replace the undefined term “unit” with the defined term “Facility” to refer to BES generation.²⁸

²³ *Id.*

²⁴ *See, e.g., Petition of NERC for Approval of Revised Definitions of Terms used in Reliability Standards*, Docket No. RD16-3-000 (Dec. 7, 2015); *Petition of NERC for Approval of New, Revised, and Retired Definitions of Terms used in NERC Reliability Standards*, Docket No. RD24-6-000 (Mar. 8, 2024).

²⁵ Order No. 693 at P 1893 (The Commission approves the glossary.).

²⁶ *N. Am. Elec. Reliability Corp.*, Docket No. RD16-3-000 (letter order) (Jan. 21, 2016).

²⁷ *Order on Electric Reliability Organization Risk Based Registration Initiative and Requiring Compliance Filing*, 150 FERC ¶ 61,213 (Mar. 19, 2015).

²⁸ *Petition of NERC for Approval of Revised Definitions of Terms used in Reliability Standards*, Docket No. RD16-3-000 (Dec. 7, 2015) at p. 15.

On November 17, 2022, FERC directed NERC to submit a work plan describing how it plans to identify and register owners and operators of IBRs that are connected to and have a material impact in the aggregate on the BPS but did not meet NERC’s BES definition and were not required to register with NERC as one of its registration functions.²⁹ On February 15, 2023, as amended in March 2023, NERC filed a work plan outlining concepts and milestones to achieve that directive. On May 18, 2023, FERC accepted NERC’s work plan to revise its Registry Criteria to include non-BES IBRs, and directed NERC to register the applicable owners and operators of these IBRs and require compliance with applicable Reliability Standards within 36 months of the work plan approval date.³⁰ Additionally, FERC directed NERC submit work plan updates every 90 days thereafter detailing NERC’s progress towards identifying and registering owners and operators of non-BES IBRs that have material impact on BPS reliability.³¹

On October 19, 2023, the Commission issued Order No. 901.³² In Order No. 901, the Commission directed NERC to develop new or modified Reliability Standards addressing reliability concerns related to IBRs at “all stages of interconnection, planning, and operations.”³³ Specifically, the Commission directed NERC to develop Reliability Standards for IBRs currently registered with NERC for compliance purposes, or would be in the future based on the revisions in response to the IBR Registration Order (“registered IBRs”); IBRs that are not registered with NERC (“unregistered IBRs”) but which need to be modeled for reliability; and IBRs that are

²⁹ See IBR Registration Order at P 6.

³⁰ See Work Plan Approval Order at P 52.

³¹ See e.g., IBR Registration Order at P 1; Work Plan Approval Order at P 38. NERC Work Plan Updates are provided in Docket No. RD22-4-000. The Work Plan Updates include NERC’s efforts to identify all the Generator Owners and Generator Operators with non-BES IBRs that are candidates for registration and the cumulative amount of megawatt generation accounted for by these resources.

³² *Reliability Standards to Address Inverter-Based Resources*, Order No. 901, 185 FERC ¶ 61,042 (2023) [hereinafter Order No. 901].

³³ *Id.* at P 25.

connected to the distribution system, but, in the aggregate, can impact BES reliability (“IBR-DERs”).³⁴ Therefore, the Reliability Standards being developed in response to the directives in Order No. 901 would be applicable to those non-BES IBRs that have a material impact in the aggregate on BPS reliability that FERC directed be registered in the IBR Registration Order.

In preparation for the Registry Criteria revisions, NERC staff conducted a preliminary review of all active Reliability Standards in October 2023 to evaluate their potential applicability and enforceability to those non-BES IBRs that have a material impact in the aggregate on BPS reliability. Based on this review, NERC staff determined that, of the full population of active Reliability Standards, eight (8) standards could be considered applicable and enforceable to those non-BES IBRs without further revisions beyond updating the definitions of Generator Operator and Generator Owner to match the updated Registry Criteria.³⁵

On March 24, 2024, NERC filed its proposed revisions to the registration functions of Generator Owner and Generator Operator within the NERC Registry Criteria. On June 27, 2024, the Commission issued an Order approving revisions to the NERC Registry Criteria for the registration functions of Generator Owner and Generator Operator to include non-BES IBRs that either have or contribute to an aggregate 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.³⁶ Owners and operators of IBRs that meet the Category 2 criteria will now be required to register as Generator Owners or Generator Operator, as applicable.

³⁴ *Id.* at P 4 n.14.

³⁵ The eight Reliability Standards identified for applicability are BAL-001-TRE, IRO-010-5, MOD-032-1, PRC-012-2, PRC-017-1, TOP-003-6.1, VAR-001-5, and VAR-002-4.1. NERC staff analysis is available at https://www.nerc.com/pa/Stand/202401%20Rules%20of%20Procedure%20Definitions%20Alignment%20GO/ComplianceDatesforGOs_GOPS.pdf.

³⁶ Registry Criteria Approval Order at PP 36-37.

Following approval of the revised Registry Criteria, NERC developed a Standard Authorization Request (“SAR”) to align the definitions of the Generator Owner and Generator Operator terms within the NERC Glossary with the corresponding registration functions in the NERC Registry Criteria. The purpose of the project was to ensure a constancy meaning of the Generator Owner and Generator Operator terms across all NERC materials and ensure that NERC Reliability Standards would be applicable to Generator Owners and Generator Operators with IBRs meeting the Category 2 criteria by May 2026.³⁷

In January 2025, the Standards Committee approved the SAR and assigned it to a new project, Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator). NERC developed the proposed revised definitions using NERC’s standard development process. The proposed revisions to the definitions of Generator Owner and Generator Operator were developed in an open and fair manner and in accordance with the Commission-approved development process for Reliability Standards and definitions of terms used in Reliability Standards, which included multiple comment and ballot periods. The proposed definitions were adopted by the NERC Board of Trustees on August 14, 2025. A summary of the development history and the complete record of development is attached to this petition as **Exhibit E**.

III. JUSTIFICATION FOR APPROVAL

NERC submits for Commission approval the proposed revised definitions of Generator Owner and Generator Operator for inclusion in the NERC Glossary. The proposed revisions to the NERC Glossary definitions of Generator Owner and Generator Operator definitions are necessary to enhance BPS reliability by expanding the applicability of Reliability Standards to owners and

³⁷ *Supra* note 30.

operators of IBRs meeting the Category 2 criteria. As recognized in the IBR Registration Order, these resources have contributed to multiple system events and grid disturbances due to widespread loss of IBR generating resources that abnormally tripped, ceased current injection, or reduced power output with control interactions.³⁸ To ensure Reliability Standards are applicable and effectively address these reliability risks, the Generator Owner and Generator Operator definition in the NERC Glossary must be expanded to include the Category 2 criteria.

The proposed revisions would also reestablish alignment with the revised Generator Owner and Generator Operator registration functions that were approved by the Commission in the Registry Criteria Approval Order.³⁹ Approving the proposed definitions would eliminate the inconsistency terminology differences that currently exists and ensure that owners and operators with IBRs meeting the Category 2 criteria are both registered with NERC and subject to the appropriate Reliability Standards.

NERC proposes the Commission approve the following revised definitions of Generator Owner and Generator Operator for inclusion in the NERC Glossary:

- **Generator Owner:** The entity that: 1) owns and maintains generating Facility(ies) (Category 1 GO); or 2) owns and maintains non-BES Inverter-Based Resource(s) that either have or contribute to an aggregate 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 (Category 2 GO).
- **Generator Operator:** The entity that: 1) operates generating Facility(ies) and performs the functions of supplying energy and Interconnected Operations Services (Category 1 GOP); or 2) operates non-BES Inverter-Based Resource(s) that either

³⁸ See e.g., IBR Registration Order at P 5; NERC, *Event Reports*, involving IBRs entering into momentary cessation or tripping in the aggregate: (1) the Blue Cut Fire (August 16, 2016); (2) the Canyon 2 Fire (October 9, 2017); (3) Angeles Forest (April 20, 2018); (4) Palmdale Roost (May 11, 2018); (5) San Fernando (July 7, 2020); (6) the first Odessa, Texas event (May 9, 2021); (7) the second Odessa, Texas event (June 26, 2021); (8) Victorville (June 24, 2021); (9) Tumbleweed (July 4, 2021); (10) Windhub (July 28, 2021); (11) Lytle Creek (August 26, 2021), and (12) Panhandle Wind Disturbance (March 22, 2022), <https://www.nerc.com/pa/rrm/ea/Pages/Major-Event-Reports.aspx>.

³⁹ See Registry Criteria Approval Order at P 36.

have or contribute to an aggregate 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 (Category 2 GOP).

The Registry Criteria revisions were designed to include owners and operators of non-BES IBRs that have either an individual or aggregate material impact on the reliable operation of the BPS for NERC registration as Generator Owners or Generator Operators. This approach was adopted because it was determined to be the most effective and efficient means of addressing the reliability gap with minimized burdens for registration implementation and Reliability Standards development.⁴⁰ Given the multiple disturbance events involving non-BES IBRs,⁴¹ it is critical that owners and operators of IBRs meeting the Category 2 criteria are subject to appropriate Reliability Standards as soon as possible to help prevent future reliability issues.

While adding the Category 2 criteria to the Generator Owner and Generator Operator terms in the NERC Glossary, NERC identified that eight (8) Reliability Standards could become applicable to entities registering under the Category 2 criteria without further revisions to the standards. The drafting team determined that all eight (8) Reliability Standards should in fact become applicable to such entities, as identified in the proposed implementation plan in **Exhibit B**. These standards include:

- BAL-001-TRE (Primary Frequency Response in the ERCOT Region)
- IRO-010-5 (Reliability Coordinator Data and information Specification and Collection)
- MOD-032-1 (Data for Power System Modeling and Analysis)

⁴⁰ *N. Am. Elec. Reliability Corp. Request for Approval of Proposed Revisions to the Rules of Procedure to Address Unregistered Inverter Based Resources and Request for Expedited Review*, Docket No. RD22-4-000 at 6 (March 19, 2024).

⁴¹ *Supra* note 38.

- PRC-012-2 (Remedial Action Schemes)
- PRC-017-1 (Remedial Action Scheme Maintenance and Testing)
- TOP-003-6.1 (Transmission Operator and Balancing Authority Data and Information Specification and Collection)
- VAR-001-5 (Voltage and Reactive Control)
- VAR-002-4.1 (Generator Operation for Maintaining Network Voltage Schedules)

The above-listed Reliability Standards address important matters relating to the reliability of the BPS, including requirements for providing data needed for operations planning and real-time monitoring and assessments, developing modeling data requirements and reporting procedures, ensuring Remedial Action Schemes are properly designed to avoid unintentional reliability risks, and ensuring voltage levels are monitored, controlled, and maintained to protect equipment. These standards help ensure the reliable operation of the BPS by requiring data sharing to increase situational awareness and by requiring equipment protection to safeguard generating resources. The proposed revisions to the Generator Owner and Generator Operator terms would advance reliability and efficiency by ensuring that owners and operators of IBRs meeting the Category 2 criteria, which the Commission has determined to be material to BPS reliability, are subject to these eight (8) Reliability Standards by May 15, 2026.

All other Reliability Standards currently applicable to Generator Owners and Generator Operators would require revisions through NERC's standard development process to be applicable to Generator Owners or Generator Operators with IBRs meeting the Category 2 criteria. Many Reliability Standards use the term "BES" or reference defined terms in the NERC Glossary that rely on the BES definition. This exclusionary language prevents certain Reliability Standards from applying to Generator Owners or Generator Operators with IBRs meeting the Category 2 criteria,

as the Category 2 criteria specifically refers to IBRs below the BES threshold. Using the standard development process, it may take additional time for NERC to determine which of these Reliability Standards should apply to Generator Owners or Generator Operators with IBRs meeting the Category 2 criteria, balancing all relevant considerations, and the appropriate revisions and timeframe to effectuate such applicability.

During the standard development process, the drafting team reviewed the revised Generator Owner and Generator Operator functions that incorporated the Category 2 criteria from the Registry Criteria Approval Order. The drafting team determined that the corresponding terms in the NERC Glossary should align exactly with those in the Registry Criteria. Additionally, the drafting team considered stakeholder recommendations to create new terms to describe the owners and operators of IBRs meeting the Category 2 criteria, rather than aligning the definitions in the NERC Glossary with the definitions approved in the Registry Criteria.⁴² Considering the Commission already approved the addition of the Category 2 criteria in the Registry Criteria Approval Order, the Commission's direction that Reliability Standards be applicable to owners and operators of such IBRs by May 2026, and the fact that eight (8) standards could become applicable with simple definition revisions and would require more extensive revisions if new terms were created, the drafting team determined to not pursue that recommendation.

In summary, the proposed revisions to the defined terms of Generator Owner and Generator Operator within the NERC Glossary would promote consistency, reduce confusion, and support the most effective and efficient approach with minimized burdens for standards development

⁴² See, Exhibit D Summary of Development and Complete Record of Development at item 9, July 2, 2025 Consideration of Comments, at 17 and 20. (responses to Question 1).

process to ensure Reliability Standards are applicable by the May 2026 deadline, in accordance with the IBR Registration Order⁴³ and Work Plan Approval Order.⁴⁴

As discussed in **Exhibit C**, the proposed revisions to the Generator Owner and Generator Operator definitions meet the Commission's criteria for approval in Order No. 672. They would advance reliability and expand applicability in the Reliability Standards in which they are used. Commission approval of the proposed revisions to the Generator Owner and Generator Operator definitions would be just, reasonable, not unduly discriminatory, and in the public interest. NERC respectfully requests that the Commission approve the proposed revisions to the Generator Owner and Generator Operator definitions, to become effective in accordance with the proposed implementation plan discussed in **Section IV**.

IV. EFFECTIVE DATE OF THE PROPOSED GENERATOR OWNER AND GENERATOR OPERATOR DEFINITIONS

NERC respectfully requests that the Commission approve the implementation plan attached to this petition as **Exhibit B**. The proposed implementation plan provides that the proposed Generator Owner and Generator Operator definitions would become effective on the first day of the first calendar quarter after applicable regulatory approval. The eight Reliability Standards identified as becoming applicable to Generator Owners and Generator Operators with IBRs meeting the Category 2 criteria following the approval of the revised definitions would become effective on May 15, 2026.

NERC has (or will) propose separate implementation plans to govern implementation of the new and revised Reliability Standards addressing IBR-related reliability risks identified in Order No. 901, including for Generator Owners and Generator Operators with IBRs meeting the

⁴³ *Supra* note 7.

⁴⁴ *Id.*

Category 2 criteria.⁴⁵ Additionally, and as noted above, NERC has identified that other Reliability Standards that are currently applicable to Generator Owners or Generator Operators would not be applicable to Generator Owners or Generator Operators with IBRs meeting the Category 2 criteria unless those standards are revised to make them applicable, in accordance with NERC standards development process.⁴⁶ At the time those standards are revised, NERC would propose one or more implementation plans to govern the implementation of those standards.

V. REQUEST FOR EXPEDITED ACTION

NERC respectfully requests that the Commission approve the proposed Generator Owner and Generator Operator definitions and associated implementation plan in an expedited manner. Expedited treatment would be necessary, appropriate, and in the public interest, as it would provide timely certainty regarding which Reliability Standards would be applicable to Generator Owners and Generator Operators with IBRs meeting the Category 2 criteria in May 2026. It would also ensure consistency of the Generator Owner and Generator Operator terms across NERC materials and resolve the current differences between how terms are defined between the NERC Registry Criteria and NERC Glossary. Expedited treatment would advance the public interest by supporting efficient implementation of Reliability Standards addressing important reliability matters and providing timely certainty for entities with new compliance obligations.

The IBR Registration Order and Work Plan Approval Order recognize the pressing need for registration and requiring compliance with appropriate Reliability Standards for non-BES

⁴⁵ See e.g. *N. Am. Elec. Reliability Corp.*, 190 FERC ¶ 61,098 (2025) (Order approving PRC-028-1 and PRC-030-1 that will be applicable to Generator Owners and Generator Operators with IBRs meeting the category 2 criteria in accordance with those standards' implementation plans); *Reliability Standards for Frequency and Voltage Protection Settings and Ride-Through for Inverter-Based Resources*, 192 FERC ¶ 61,076 (2025) (Order approving PRC-029-1 that will be applicable to Generator Owners and Generator Operators with IBRs meeting the Category 2 criteria in accordance with its implementation plan).

⁴⁶ *Supra* note 18, Appendix 3A Standards Process Manual

IBRs, and NERC seeks to address this need as soon as reasonably possible.⁴⁷ Expedited review and action on this petition would not impede due process, as the proposed revisions to the Generator Owner and Generator Operator terms have already been substantively approved by the Commission in the Registry Criteria Approval Order. The proposed revisions are simply to align the NERC Glossary with the Registry Criteria for consistency and ensure applicability of the Reliability Standards to the newly registered entities. Additionally, NERC's standard development process has provided ample opportunity for stakeholder participation as the revised Generator Owner and Generator Operator terms, and implementation plan were developed. Therefore, expedited review would appropriately balance due process with the urgent reliability need identified in the IBR Registration Order.

⁴⁷ See *Order Approving Cold Weather Reliability Standards*, 176 FERC ¶ 61,119 (2021) (approving NERC's Cold Weather Reliability Standards on an expedited basis after balancing due process with the public interest in having mandatory requirements in place as soon as reasonably possible as well as regulatory certainty to industry and potentially affected entities).

VI. CONCLUSION

For the reasons set forth above, NERC respectfully requests that the Commission approve:

- The proposed Generator Owner and Generator Operator definitions, as shown in **Exhibit A**; and
- The implementation plan included in **Exhibit B**.

Respectfully submitted,

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August 27, 2025

Exhibit A
Proposed Definitions for Inclusion in the *Glossary of Terms used in NERC Reliability Standards*

Exhibit A-1

Proposed Definitions for Inclusion in the *Glossary of Terms used in NERC Reliability Standards*

Clean

Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard is adopted by the NERC Board of Trustees (Board).

Description of Current Draft

This is the final draft of the proposed definitions for a 10-day ballot.

Completed Actions	Date
Standards Committee approved Standards Authorization Request (SAR)	June 12, 2024
SAR posted for comment	July 2 – August 20, 2024
45-day formal comment period with initial ballot	March 24 – May 7, 2025

Anticipated Actions	Date
10-day final ballot	July 2 – 14, 2025
Board adoption	August 2025

Modified Term(s) Used in NERC Reliability Standards

This section includes the modified terms that will be included in the NERC Glossary of Terms to be used in NERC Reliability Standards upon applicable regulatory approval. The terms proposed below are intended to be used in NERC Reliability Standards applicable to Category 2 Generator Owners and Generator Operators.

Terms:

Generator Owner (GO): The entity that: 1) owns and maintains generating Facility(ies) (Category 1 GO); or 2) owns and maintains non-BES Inverter-Based Resource(s) that either have or contribute to an aggregate 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 (Category 2 GO).

Generator Operator (GOP): The entity that: 1) operates generating Facility(ies) and performs the functions of supplying energy and Interconnected Operations Services (Category 1 GOP); or 2) operates non-BES Inverter-Based Resources(s) that either have or contribute to an aggregate 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 (Category 2 GOP).

Version History

Version	Date	Action	Change Tracking
1	TBD	Modified Generator Owner Definition Modified Generator Operator Definition	

Exhibit A-2

Proposed Definitions for Inclusion in the *Glossary of Terms used in NERC Reliability Standards*

Redline

Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard is adopted by the NERC Board of Trustees (Board).

Description of Current Draft

This is the initial draft of the proposed definitions for a formal 45-day comment period with an initial ballot.

Completed Actions	Date
Standards Committee approved Standards Authorization Request (SAR)	June 12, 2024
SAR posted for comment	July 2 – August 20, 2024

Anticipated Actions	Date
45-day formal comment period with initial ballot	March 19, 2025
Board adoption	August 2025

Modified Term(s) Used in NERC Reliability Standards

This section includes the modified terms that will be included in the NERC Glossary of Terms to be used in NERC Reliability Standards upon applicable regulatory approval. The terms proposed below are intended to be used in NERC Reliability Standards applicable to Category 2 Generator Owners and Generator Operators.

Terms:

Generator Owner (GO): The ~~E~~entity that: 1) owns and maintains generating Facility(ies) (Category 1 GO); or 2) owns and maintains non-BES Inverter-Based Resource(s) that either have or contribute to an aggregate 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 (Category 2 GO).

Generator Operator (GOP): The entity that: 1) operates generating Facility(ies) and performs the functions of supplying energy and Interconnected Operations Services (Category 1 GOP); or 2) operates non-BES Inverter-Based Resource(s) that either have or contribute to an aggregate 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 (Category 2 GOP).

Version History

Version	Date	Action	Change Tracking
1	TBD	Modified Generator Owner Definition Modified Generator Operator Definition	

Exhibit B Implementation Plan

Implementation Plan

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

Proposed Modified Definitions in the NERC Glossary of Terms

This section includes modified definitions for inclusion in the *Glossary of Terms used in NERC Reliability Standards* (“Glossary”), as well as current NERC *Glossary* terms proposed for retirement.

Proposed Modified Definition(s):

- Generator Owner (GO)
- Generator Operator (GOP)

Background

Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) was initiated in June 2024 and concerns the reliability impacts of Inverter-Based Resources (IBRs) on the Bulk-Power System (BPS) that do not meet the current definition of Bulk Electric System (BES) and have not historically been required to be registered with NERC for compliance with the NERC Reliability Standards. Such concerns are discussed in detail in the Federal Energy Regulatory Commission (FERC) November 17, 2022 order in Docket No. RD22-4-000, in which FERC directed NERC to develop a work plan to address the registration of these IBRs and ensure their compliance with Reliability Standards by certain milestone dates. See *Registration of IBRs*, 181 FERC ¶ 61,124 (2022).

FERC approved changes to the NERC Rules of Procedure (ROP) registry criteria to include certain non-BES IBRs in the Generator Owner (GO) and Generator Operator (GOP) categories. Revising the GO and GOP definitions in the NERC Glossary of Terms to align with the registry criteria will ensure these previously unregistered IBRs will be subject to the NERC Reliability Standards and mitigate their impact on the BPS. See *Order Approving Revisions to NERC ROP and Requiring Compliance Filing*, 187 FERC ¶ 61,196 (2024).

General Considerations

The Project 2024-01 Drafting Team (DT) has proposed modification to the definitions of “Generator Owner” and “Generator Operator” as defined in the NERC Glossary to ensure the inclusion of Category 2 criteria as referenced in the NERC ROP, which includes some IBRs connected to the BPS that do not meet the current definition of BES.

Effective Date for the Modified Definitions for NERC Glossary of Terms

Where approval by an applicable governmental authority is required, the modified definitions shall become effective on the first day of the first calendar quarter after the effective date of the

applicable governmental authority's order approving the definitions, or as otherwise provided for by the applicable governmental authority.

Where approval by an applicable governmental authority is not required, the modified definitions shall become effective on the first day of the first calendar quarter after the date the definitions are adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

Compliance Dates for the Listed Standards

Eight (8) Reliability Standards have been identified through a NERC staff analysis¹ as applicable and enforceable to generation assets that meet the Category 2 criteria without any revisions to those Reliability Standards or requirements.

For those generation assets that meet the Category 2 criteria in the modified definitions, GOs and GOPs shall comply with the below-listed Reliability Standards on May 15, 2026, or as otherwise provided for by the applicable governmental authorities in that jurisdiction.

These standards are as follows:

- BAL-001-TRE-2
- IRO-010-5
- MOD-032-1
- PRC-012-2
- PRC-017-1
- TOP-003-6.1
- VAR-001-5
- VAR-002-4.1

Reliability Standards that specify they are applicable only to BES Facilities will not be enforceable on Category 2 facilities unless there is a specific Reliability Standards project that revises them to include Category 2 facilities.

For requirements in the Reliability Standards that require an action be taken in response to an action or request by another functional entity (e.g., responding to data specifications or following voltage schedules), any GO or GOP with one or more facilities that meet the Category 2 criteria, shall be required to comply only after the action or request is made. This only applies to GO or GOP Category 2 facilities.

¹ [NERC GO-GOP Analysis Summary.docx](#)

Currently approved Reliability Standards PRC-028-1, PRC-030-1, and recently filed NERC Reliability Standard PRC-029-1 is drafted such that, if approved, will be enforceable for Category 2 GOs and GOPs based on the Implementation Plans for those Reliability Standards.

All other Reliability Standards using GO and GOP may become applicable and enforceable to generation assets that meet the Category 2 criteria upon their revision² and in accordance with their respective revised Reliability Standard language and Implementation Plans.

Definitions Proposed for Retirement

The definitions proposed for retirement shall be retired immediately prior to the effective date of the modified GO and GOP definitions in the particular jurisdiction in which these modified definitions become effective.

² [NERC ROP Appendix 3A](#)

Exhibit C
Order No. 672 Criteria

EXHIBIT C

Order No. 672 Criteria

In Order No. 672,¹ the Commission identified a number of criteria it will use to analyze Reliability Standards proposed for approval to ensure they are just, reasonable, not unduly discriminatory or preferential, and in the public interest. The discussion below identifies these factors and explains how the proposed revised definitions of Generator Owner and Generator Operator have met or exceeded the criteria.

1. Proposed Reliability Standards must be designed to achieve a specified reliability goal and must contain a technically sound means to achieve that goal.²

The proposed revised definitions of Generator Owner and Generator Operator within the NERC Glossary will establish consistency and common understanding of what Generator Owner and Generator Operator are for all standards projects and Reliability Standards going forward. The Generator Owner and Generator Operator definitions are intended to align the terms in the NERC Glossary with the recently revised Generator Owner and Generator Operator registration functions

¹ *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards*, Order No. 672, 114 FERC ¶ 61,104, *order on reh'g*, Order No. 672-A, 114 FERC ¶ 61,328 (2006) [hereinafter Order No. 672].

² *See* Order No. 672, *supra* note 1, at P 321 (“The proposed Reliability Standard must address a reliability concern that falls within the requirements of section 215 of the FPA. That is, it must provide for the reliable operation of Bulk-Power System facilities. It may not extend beyond reliable operation of such facilities or apply to other facilities. Such facilities include all those necessary for operating an interconnected electric energy transmission network, or any portion of that network, including control systems. The proposed Reliability Standard may apply to any design of planned additions or modifications of such facilities that is necessary to provide for reliable operation. It may also apply to Cybersecurity protection.”).

See Order No. 672, *supra* note 1, at P 324 (“The proposed Reliability Standard must be designed to achieve a specified reliability goal and must contain a technically sound means to achieve this goal. Although any person may propose a topic for a Reliability Standard to the ERO, in the ERO’s process, the specific proposed Reliability Standard should be developed initially by persons within the electric power industry and community with a high level of technical expertise and be based on sound technical and engineering criteria. It should be based on actual data and lessons learned from past operating incidents, where appropriate. The process for ERO approval of a proposed Reliability Standard should be fair and open to all interested persons.”).

in the NERC Rules of Procedure Statement of Compliance Registry Criteria,³ approved by the Commission on June 27, 2024.⁴

The addition of the revised defined terms to the NERC Glossary would promote consistency, avoid confusion, and ensure that owners and operators with IBRs meeting the Category 2 criteria are registered and subject to the appropriate Reliability Standards.

The proposed definitions of Generator Owner and Generator Operator are thus designed to achieve a specific reliability goal and contain a technically sound means to achieve that goal.

2. Proposed Reliability Standards must be applicable only to users, owners, and operators of the bulk power system, and must be clear and unambiguous as to what is required and who is required to comply.⁵

The proposed definitions of Generator Owner and Generator Operator are clear and unambiguous as to what is required and who is required to comply and support clear and consistent application in the Reliability Standards in which it is used, in accordance with Order No. 672. The proposed definitions of Generator Owner and Generator Operator will help clearly articulate which entities are required to take actions to comply with the applicable standards.

³ The NERC Rules of Procedure, Appendix 5B, Statement of Compliance Registry Criteria, available at https://www.nerc.com/AboutNERC/RulesOfProcedure/Appendix%205B%20eff%2020240627_signed.pdf [hereinafter Registry Criteria].

⁴ *Order Approving Revisions to North American Electric Reliability Corporation Rules of Procedure and Requiring Compliance Filing*, 187 FERC ¶ 61,196 (2024) [hereinafter Registry Criteria Approval Order].

⁵ *See* Order No. 672, *supra* note 1, at P 322 (“The proposed Reliability Standard may impose a requirement on any user, owner, or operator of such facilities, but not on others.”).

See Order No. 672, *supra* note 1, at P 325 (“The proposed Reliability Standard should be clear and unambiguous regarding what is required and who is required to comply. Users, owners, and operators of the Bulk-Power System must know what they are required to do to maintain reliability.”).

3. A proposed Reliability Standard must include clear and understandable consequences and a range of penalties (monetary and/or non-monetary) for a violation.⁶

The proposed definitions of Generator Owner and Generator Operator will help support the clear and consistent application of Reliability Standards in which they are used. No changes are proposed to the Reliability Standards in which those terms are used; thus, no changes are proposed to the approved Violation Severity Levels or Violation Risk Factors for those Reliability Standards.

4. A proposed Reliability Standard must identify clear and objective criteria or measures for compliance, so that it can be enforced in a consistent and non-preferential manner.⁷

The proposed definitions of Generator Owner and Generator Operator will help support the clear and consistent application of Reliability Standards in which they are used. No changes are proposed to those Reliability Standards; thus, no changes are made to the measures⁸ in those Reliability Standards that support each requirement by clearly identifying what is required and how the requirement will be enforced.

⁶ See Order No. 672, *supra* note 1, at P 326 (“The possible consequences, including range of possible penalties, for violating a proposed Reliability Standard should be clear and understandable by those who must comply.”).

⁷ See Order No. 672, *supra* note 1, at P 327 (“There should be a clear criterion or measure of whether an entity is in compliance with a proposed Reliability Standard. It should contain or be accompanied by an objective measure of compliance so that it can be enforced and so that enforcement can be applied in a consistent and non-preferential manner.”).

⁸ These measures help provide clarity regarding how the requirements would be enforced and help ensure that the requirements would be enforced in a clear, consistent, and non-preferential manner and without prejudice to any party.

5. Proposed Reliability Standards should achieve a reliability goal effectively and efficiently, but do not necessarily have to reflect “best practices” without regard to implementation cost or historical regional infrastructure design.⁹

The proposed definitions of Generator Owner and Generator Operator achieve the reliability goals of Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) effectively and efficiently in accordance with Order No. 672. The proposed definitions of Generator Owner and Generator Operator would eliminate the inconsistent terminology differences that currently exists and ensure that owners and operators with IBRs meeting the Category 2 criteria are registered and subject to the appropriate Reliability Standards

6. Proposed Reliability Standards cannot be “lowest common denominator,” i.e., cannot reflect a compromise that does not adequately protect Bulk-Power System reliability. Proposed Reliability Standards can consider costs to implement for smaller entities, but not at consequences of less than excellence in operating system reliability.¹⁰

⁹ See Order No. 672, *supra* note 1, at P 328 (“The proposed Reliability Standard does not necessarily have to reflect the optimal method, or ‘best practice,’ for achieving its reliability goal without regard to implementation cost or historical regional infrastructure design. It should however achieve its reliability goal effectively and efficiently.”).

¹⁰ See Order No. 672, *supra* note 1, at P 329 (“The proposed Reliability Standard must not simply reflect a compromise in the ERO’s Reliability Standard development process based on the least effective North American practice—the so-called ‘lowest common denominator’—if such practice does not adequately protect Bulk-Power System reliability. Although the Commission will give due weight to the technical expertise of the ERO, we will not hesitate to remand a proposed Reliability Standard if we are convinced it is not adequate to protect reliability.”).

See Order No. 672, *supra* note 1, at P 330 (“A proposed Reliability Standard may take into account the size of the entity that must comply with the Reliability Standard and the cost to those entities of implementing the proposed Reliability Standard. However, the ERO should not propose a ‘lowest common denominator’ Reliability Standard that would achieve less than excellence in operating system reliability solely to protect against reasonable expenses for supporting this vital national infrastructure. For example, a small owner or operator of the Bulk-Power System must bear the cost of complying with each Reliability Standard that applies to it.”).

The proposed definitions of Generator Owner and Generator Operator do not reflect a “lowest common denominator” approach. The proposed definitions of Generator Owner and Generator Operator would enhance BPS reliability by expanding the applicability of Reliability Standards to owners and operators of IBRs meeting the Category 2 criteria which have contributed to multiple system events and grid disturbances due to widespread loss of IBR generating resources that abnormally tripped, ceased current injection, or reduced power output with control interactions and currently not subject to NERC compliance obligations.

7. **Proposed Reliability Standards must be designed to apply throughout North America to the maximum extent achievable with a single Reliability Standard while not favoring one geographic area or regional model. It should take into account regional variations in the organization and corporate structures of transmission owners and operators, variations in generation fuel type and ownership patterns, and regional variations in market design if these affect the proposed Reliability Standard.**¹¹

The proposed definitions of Generator Owner and Generator Operator would continue to apply consistently throughout North America and do not favor one geographic area or regional model.

¹¹ See Order No. 672, *supra* note 1, at P 331 (“A proposed Reliability Standard should be designed to apply throughout the interconnected North American Bulk-Power System, to the maximum extent this is achievable with a single Reliability Standard. The proposed Reliability Standard should not be based on a single geographic or regional model but should take into account geographic variations in grid characteristics, terrain, weather, and other such factors; it should also take into account regional variations in the organizational and corporate structures of transmission owners and operators, variations in generation fuel type and ownership patterns, and regional variations in market design if these affect the proposed Reliability Standard.”).

8. Proposed Reliability Standards should cause no undue negative effect on competition or restriction of the grid beyond any restriction necessary for reliability.¹²

The proposed definitions of Generator Owner and Generator Operator would have no undue negative effect on competition and would not unreasonably restrict the available transmission capacity or limit the use of the BPS in a preferential manner. The Reliability Standards in which the proposed definitions of Generator Owner and Generator Operator are used are unchanged and would continue to require the same performance by each of the applicable entities.

9. The implementation time for the proposed Reliability Standard is reasonable.¹³

The proposed effective date for the proposed definitions of Generator Owner and Generator Operator is just and reasonable and appropriately balances the urgency in the need to implement the standard against the reasonableness of the time allowed for those who must comply to develop necessary procedures or other relevant capability. The proposed implementation plan provides that the proposed definitions of Generator Owner and Generator Operator would become effective on the first day of the first calendar quarter following regulatory approval. Additionally, the eight Reliability Standards identified as becoming applicable to Generator Owners and Generator Operators with IBRs meeting the Category 2 criteria following the approval of the revised definitions would become effective on May 15, 2026. This implementation timeline appropriately

¹² See Order No. 672, *supra* note 1, at P 332 (“As directed by section 215 of the FPA, the Commission itself will give special attention to the effect of a proposed Reliability Standard on competition. The ERO should attempt to develop a proposed Reliability Standard that has no undue negative effect on competition. Among other possible considerations, a proposed Reliability Standard should not unreasonably restrict available transmission capability on the Bulk-Power System beyond any restriction necessary for reliability and should not limit use of the Bulk-Power System in an unduly preferential manner. It should not create an undue advantage for one competitor over another.”).

¹³ See Order No. 672, *supra* note 1, at P 333 (“In considering whether a proposed Reliability Standard is just and reasonable, the Commission will consider also the timetable for implementation of the new requirements, including how the proposal balances any urgency in the need to implement it against the reasonableness of the time allowed for those who must comply to develop the necessary procedures, software, facilities, staffing or other relevant capability.”).

balances the urgency in the need to implement the standards against the time allowed for those who must comply to develop necessary procedures and other relevant capabilities. The proposed implementation plan is attached as **Exhibit B** to this petition.

10. The Reliability Standard was developed in an open and fair manner and in accordance with the Commission-approved Reliability Standard development process.¹⁴

The proposed definitions of Generator Owner and Generator Operator were developed in accordance with NERC's Commission-approved processes for developing and approving Reliability Standards. **Exhibit D** includes a summary of the development proceedings for the proposed definitions of Generator Owner and Generator Operator, and details the processes followed to develop the proposed definitions of Generator Owner and Generator Operator. These processes included, among other things, comment periods, pre-ballot review periods, and balloting periods. Additionally, all meetings of the standard drafting team were properly noticed and open to the public.

11. NERC must explain any balancing of vital public interests in the development of proposed Reliability Standards.¹⁵

NERC has identified no competing public interests regarding the request for approval of the proposed definitions of Generator Owner and Generator Operator. No comments were received

¹⁴ See Order No. 672, *supra* note 1, at P 334 ("Further, in considering whether a proposed Reliability Standard meets the legal standard of review, we will entertain comments about whether the ERO implemented its Commission-approved Reliability Standard development process for the development of the particular proposed Reliability Standard in a proper manner, especially whether the process was open and fair. However, we caution that we will not be sympathetic to arguments by interested parties that choose, for whatever reason, not to participate in the ERO's Reliability Standard development process if it is conducted in good faith in accordance with the procedures approved by the Commission.").

¹⁵ See Order No. 672, *supra* note 1, at P 335 ("Finally, we understand that at times development of a proposed Reliability Standard may require that a particular reliability goal must be balanced against other vital public interests, such as environmental, social and other goals. We expect the ERO to explain any such balancing in its application for approval of a proposed Reliability Standard.").

that indicated that the proposed definitions of Generator Owner and Generator Operator conflicts with other vital public interests.

12. Proposed Reliability Standards must consider any other appropriate factors.¹⁶

No other negative factors relevant to whether the proposed definitions of Generator Owner and Generator Operator are just and reasonable were identified.

¹⁶ See Order No. 672, *supra* note 1, at P 323 (“In considering whether a proposed Reliability Standard is just and reasonable, we will consider the following general factors, as well as other factors that are appropriate for the particular Reliability Standard proposed.”).

Exhibit D
Summary of Development and Complete Record of Development

Summary of Development History

The following is a summary of the development record for the proposed revised definitions of the terms Generator Owner and Generator Operator, developed through Project 2024-01 Rules of Procedure Definitions Alignment.

I. Overview of the Drafting Team

When evaluating a proposed Reliability Standard (to include definitions used in Reliability Standards), the Commission is expected to give “due weight” to the technical expertise of the ERO.¹ The technical expertise of the ERO is derived from the drafting team selected to lead each project in accordance with Section 4.3 of the NERC Standard Processes Manual.² For this project, the drafting team consisted of industry experts, all with a diverse set of experiences. A roster of the Project 2024-01 drafting team members is included in **Exhibit E**.

II. Definition Development History

A. Project Initiation

Project 2024-01 addresses concerns regarding the reliability impacts of Inverter-Based Resources (“IBRs”) on the Bulk-Power System that do not meet the current definition of Bulk Electric System (“BES”) and have not historically been required to be registered with NERC for compliance with the NERC Reliability Standards. On November 17, 2022, FERC issued an order which directed NERC to develop a work plan to address identification and the registration of these IBRs.³ On May 18 2023, FERC accepted the work plan and directed NERC to register the applicable IBRs.⁴ In March 2024, NERC proposed changes to its Rules of Procedure registry

¹ Section 215(d)(2) of the Federal Power Act; 16 U.S.C. § 824(d)(2).

² The NERC *Standard Processes Manual* is available at <https://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>.

³ *Registration of Inverter-Based Resources*, 181 FERC ¶ 61,124 (2022).

⁴ *Order Approving Registration Work Plan*, 183 FERC ¶ 61,116 (2023).

criteria to include criteria for certain non-BES IBRs that have a material impact on BPS reliability in the Generator Owner and Generator Operator functions. NERC developed a Standard Authorization Request (“SAR”) to align the definitions of the Generator Owner and Generator Operator terms in the NERC Glossary with the recently revised Generator Owner and Generator Operator registration functions in the NERC Rules of Procedure Statement of Compliance Registry Criteria,⁵ approved by the Commission on June 27, 2024.⁶

B. Standard Authorization Request Development

On May 15, 2024, the Standards Committee accepted the Generator Owner and Generator Operator Definition Alignment Standards Authorization Request to revise the Generator Owner and Generator Operator definitions in the NERC Glossary of Terms to match the registry criteria changes approved by FERC.⁷ The Standards Committee authorized posting the SAR for a 30-day formal comment period, and the solicitation of the SAR drafting team members. The SAR was posted for one 49-day formal comment period from July 2, 2024 through August 20, 2024. The drafting team (“DT”) revised the SAR to clarify that an implementation plan will be developed for the revised Generator Owner and Generator Operator definitions. On January 22, 2025, the Standards Committee authorized drafting new or modified definitions as identified in the Generator Owner and Generator Operator Definition Alignment SAR.⁸

⁵ The NERC Rules of Procedure, Appendix 5B, Statement of Compliance Registry Criteria, available at https://www.nerc.com/AboutNERC/RulesOfProcedure/Appendix%205B%20eff%2020240627_signed.pdf.

⁶ *Order approving Revisions to North American Electric Reliability Corporation Rules of Procedure and Requiring Compliance Filing*, 187 FERC ¶ 61,196 (2024) (the Commission approved revisions to the Generator Owner and Generator Operator functions in the Registry Criteria to include a new category, Category 2 Generator Owner and Category 2 Generator Operator, that own or operate non-BES IBRs).

⁷ NERC, *Standards Committee Meeting Minutes* (May 15, 2024), https://www.nerc.com/comm/SC/Agenda%20Highlights%20and%20Minutes/SC_Meeting_Minutes-May_15_2024.pdf.

⁸ NERC, *Standards Committee Meeting Agenda Package*, (Jan. 22, 2025), https://www.nerc.com/comm/SC/Agenda%20Highlights%20and%20Minutes/SC_Meeting_Agenda_Package_January_22_2025.pdf (a second SAR proposing to add new definitions for unregistered IBRs and for IBR-Distributed

C. First Formal Posting – Comment Period and Initial Ballot

On March 19, 2025, the Standards Committee authorized the initial posting of the proposed modified definitions for Generator Owner and Generator Operator and the associated Implementation Plan for a 45-day formal comment period.⁹ The initial posting took place from March 24, 2025 through May 7, 2025, with ballot pool formed in the first 30 days, and parallel initial ballots conducted during the last 10 days of the comment period. The results for the initial ballot are summarized below:

- Proposed modified definitions of Generator Owner and Generator Operator received 86.48 percent approval, reaching quorum at 89.89 percent of the ballot pool.¹⁰
- Proposed Generator Owner and Generator Operator Definitions Implementation Plan received 70.36 percent approval, reaching quorum at 90.64 percent of the ballot pool.¹¹

There were 53 sets of responses, including comments from approximately 148 different individuals and approximately 98 companies, representing 8 industry segments.¹²

D. Final Ballot

The proposed modified definitions of Generator Owner and Generator Operator and the associated Implementation Plan were posted for a 12-day final ballot period from July 2, 2025

Energy Resources (IBR-DERs) as part of this project was accepted and posted for comment. Comments were received and ultimately the Standards Committee determined to reject the SAR at its April 2025 meeting on the basis that the definitions related to unregistered IBR and IBR-DER were being considered by other projects in Milestone 3 and were outside the scope of this drafting team’s original SAR).

⁹ See NERC, *Standards Committee Meeting Minutes* (Mar. 19, 2025), https://www.nerc.com/comm/SC/Agenda%20Highlights%20and%20Minutes/SC_Meeting_Minutes_March_19_2025.pdf.

¹⁰ Exhibit D, Complete Record of Development at item 28.

¹¹ *Id.* at item 29.

¹² *Id.* at items 24, 25.

through July 14, 2025.¹³ The final ballot for the proposed modified definitions of Generator Owner and Generator Operator reached quorum at 91.01 percent of the ballot pool, receiving support from 85.98 percent of the voters.¹⁴ The final ballot for the Implementation Plan reached quorum at 91.76 percent of the ballot pool, receiving support from 73.83 percent of the voters.¹⁵

E. Board of Trustees Adoption

The NERC Board of Trustees adopted the proposed modified definitions of Generator Owner and Generator Operator on August 14, 2025.¹⁶

¹³ *Id.* at item 33.

¹⁴ *Id.* at item 34.

¹⁵ *Id.* at item 35.

¹⁶ *See* NERC Board of Trustees Agenda Package, Agenda Item 6bi (Rules of Procedure Definitions – Generator Owner and Generator Operator) (Aug. 14, 2025), <https://www.nerc.com/gov/bot/Agenda%20highlights%20and%20Minutes%202013/Board%20of%20Trustees%20Open%20Meeting%20Agenda%20Package%20-%20August%202025%20Attendees.pdf>.

Complete Record of Development

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

Related Files

Status

Final ballots for **Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)** revised definitions of Generator Owner and Generator Operator for inclusion in the *Glossary of Terms Used in NERC Reliability Standards* and the associated Implementation Plan concluded at **8 p.m. Eastern, Monday, July 14, 2025**.

The definitions will be submitted to the Board of Trustees for adoption and then filed with the appropriate regulatory authorities.

Background

The project will address the definitions for Generator Owners and Generator Operators 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 Rules of Procedure. See Federal Energy Regulatory Commission (FERC) [Docket No. RD22-4-000](#).

In March 2024, NERC proposed changes to its Rules of Procedure registry criteria to include certain non-BES IBRs in the Generator Owner (GOs) and Generator Operator (GOP) categories. Revising the GO and GOP definitions in the NERC Glossary of Terms to match the registry criteria will ensure these previously unregistered IBRs will be subject to the NERC Reliability Standards and mitigate their impacts on the BPS. The revisions to the NERC Rules of Procedure were submitted to FERC in response to direction to NERC to develop a work plan to address the registration of these IBRs and ensure their compliance with Reliability Standards by certain milestone dates. See *Registration of Inverter-Based Resources*, 181 FERC ¶ 61,124 (Nov. 17, 2022)

Standard(s) Affected: The following Standards will require no revisions to be applicable to Category 2 Generator Owners/Operators following the approval of revised definitions: BAL-001-TRE-2, IRO-010-5, MOD-032-1, PRC-012-2, PRC-017-1, TOP-003-6.1, VAR-001-5, VAR-002-4.1. The Implementation Plan for this project will provide more detailed information regarding effective dates and any phased-in implementation.

Purpose/Industry Need

The goal of this project is to match the NERC Glossary of Terms definitions of Generator Owner and Generator Operator with the revised definitions contained in the Rules of Procedure registry criteria for Generator Owner and Generator Operator.

Subscribe to this project's observer mailing list

Select "NERC Email Distribution Lists" from the "Service" drop-down menu and specify "Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) Observer List" in the Description Box.

Draft	Actions	Dates	Results	Consideration of Comments
<p>Final Draft</p> <p>(30) Generator Owner and Generator Operator Glossary of Terms Definitions</p> <p>Implementation Plan (31) Clean (32) Redline</p>	<p>Final Ballot</p> <p>(33) Info</p> <p>Vote</p>	07/02/25 – 07/14/25	<p>Ballot Results</p> <p>(34) GO and GOP Definitions</p> <p>(35) Implementation Plan</p>	
<p>Draft 1</p> <p>Generator Owner and Generator Operator Glossary of Terms Definitions</p> <p>(19) Clean (20) Redline</p> <p>(21) Implementation Plan</p> <p>Supporting Materials</p> <p>(22) Unofficial Comment Form</p>	<p>Initial Ballots Non-binding Poll is not applicable; only definitions and implementation plan are being balloted</p> <p>(26) Ballot Reminder</p> <p>(27) Info</p> <p>Vote</p>	04/28/25 – 05/07/25	<p>Ballot Results</p> <p>(28) GO and GOP Definitions</p> <p>(29) Implementation Plan</p>	<p>(25) Consideration of Comments</p>
	<p>Join Ballot Pools</p>	03/24/25 – 04/22/25	<p>(24) Comments Received</p>	
	<p>Comment Period</p> <p>(23) Info</p> <p>Submit</p>	03/24/25 – 05/07/25		

<p>Standard Authorization Request - GO and GOP Definition (17) Clean (18) Redline</p>	<p>The SC approved the SAR on January 22, 2025</p>			
<p>(11) Standard Authorization Request - IBR</p> <p>Supporting Materials</p> <p>(12) Unofficial Comment Form (Word) *updated</p>	<p>Comment Period (13) Updated Info (14) Info Submit Comment</p>	<p>08/13/24 – 09/16/24 (Extended)</p>	<p>(15) Comments Received</p>	<p>(16) Consideration of Comments</p>
<p>(10) SAR-IBR (Review only)</p>				
<p>(5) Standard Authorization Request</p> <p>Supporting Materials</p> <p>(6) Unofficial Comment Form (Word)</p>	<p>Comment Period (7) Info Submit Comment</p>	<p>07/02/24 – 08/20/24</p>	<p>(8) Comments Received</p>	<p>(9) Consideration of Comments</p>
<p>Drafting Team Nominations</p> <p>Supporting Materials</p> <p>(2) Unofficial Nomination Form (Word) Updated</p>	<p>Nomination Period (3) Updated Info (4) Info Submit Nominations</p>	<p>05/31/24 – 07/18/24 (Extended)</p>		
<p>(1) SAR (Review only)</p>				

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:	Generator Owner and Generator Operator Definition Alignment		
Date Submitted:	April 25, 2024		
SAR Requester			
Name:	Alison Oswald		
Organization:	NERC		
Telephone:	404-275-9410	Email:	alison.oswald@nerc.net
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 checked="" type="checkbox"/>	Emerging Risk (Reliability Issues Steering Committee) Identified	<input type="checkbox"/>	Enhanced Periodic Review Initiated
<input type="checkbox"/>	Reliability Standard Development Plan	<input 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?):			
<p>The project will address concerns regarding the reliability impacts of inverter-based resources (IBRs) on the Bulk-Power System that do not meet the current definition of Bulk Electric System (BES) and have not historically been required to be registered with NERC for compliance with the NERC Reliability Standards. Such concerns are discussed in detail in the Federal Energy Regulatory Commission (FERC) November 17, 2022 order in Docket No. RD22-4-000, in which FERC directed NERC to develop a work plan to address the registration of these IBRs and ensure their compliance with Reliability Standards by certain milestone dates. <i>See Registration of Inverter-Based Resources</i>, 181 FERC ¶ 61,124 (Nov. 17, 2022).</p> <p>In March 2024, NERC proposed changes to its Rules of Procedure registry criteria to include certain non-BES IBRs in the Generator Owner (GOs) and Generator Operator (GOP) categories. Revising the GO and GOP definitions in the NERC Glossary of Terms to match the registry criteria will ensure these previously</p>			

Requested information
unregistered IBRs will be subject to the NERC Reliability Standards and mitigate their impacts on the BPS.
Purpose or Goal (What are the reliability gap(s) or risk(s) to the BES being addressed, and how does this proposed project provide the reliability-related benefit described above?):
The goal of this project is to match the NERC Glossary of Terms definitions of Generator Owner and Generator Operator with the revised definitions contained in the Rules of Procedure registry criteria for Generator Owner and Generator Operator.
Project Scope (Define the parameters of the proposed project):
Match the NERC Glossary of Terms with the definitions contained in the Rules of Procedure for Generator Owner and Generator Operator and propose an implementation plan for these definitions that is consistent with the November 17, 2022 FERC order.
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 justification ¹ 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):
<p>The definitions of Generator Owner and Generator Operator in the NERC Rules of Procedure were revised in March 2024 to address the FERC directives from the November 17, 2022 order and NERC’s work plan for implementing that order. These revisions were filed with FERC March 19, 2024; NERC requested expedited action by June 2024.</p> <p>The NERC Glossary of Terms should be revised to match the definitions that FERC approves in the Rules of Procedure registry criteria. This team should also develop an implementation plan for applicable standards consistent with FERC’s November 17, 2022 IBR Registration order. Standards that may be applicable following a definition change include the following:</p> <ul style="list-style-type: none"> ▪BAL-001-TRE-2 ² ▪IRO-010-5 ▪MOD-032-1 ▪PRC-012-2 ▪PRC-017-1 ▪TOP-003-6.1 ▪VAR-001-5 ▪VAR-002-4.1
Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):

¹ 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.

² The Drafting team should collaborate with NERC and Regional Entity staff in the review and implementation of this standard.

Requested information	
The cost impact is unknown at this time. Updating the GO/GOP definitions in conjunction with the NERC Registry Criteria will ensure that new entities are registered as GOs or GOPs and must be compliant with NERC Reliability Standards.	
Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):	
This project will impact current non-BES IBRs with aggregate nameplate capacity greater than or equal to 20 MVA connected at a voltage greater than or equal to 60kv.	
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:	
Generator Owner, Generator Operator will be the primary affected entities. However, other entities have responsibilities with respect to GOs/GOPs under the above-listed standards (e.g. Reliability Coordinator, Balancing Authority, Transmission Operator, Transmission Planner, Planning Coordinator, Resource Planner, Transmission Service Provider).	
Do you know of any consensus building activities ³ in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.	
The Rules of Procedure changes including the new GO/GOP registry criteria definitions went through a formal comment process where input was solicited from industry before the final revisions. Additional information can be found here .	
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)?	
None	
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.	
None. The Glossary definitions of Generator Owner/Generator Operator must match those in the Rules of Procedure registry criteria to avoid conflict and confusion.	

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 checked="" 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 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.

³ 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.

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
n/a	n/a

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 checked="" 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

Unofficial Nomination Form

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

Do not use this form for submitting nominations. Use the [electronic form](#) to submit nominations for **Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)** drafting team members by **8 p.m. Eastern, July 18, 2024**. This unofficial version is provided to assist nominees in compiling the information necessary to submit the electronic form.

Additional information about this project is available on the Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) [project page](#). If you have questions, contact Senior Standards Developer, [Jessica Harris](#) (via email) or at 404-710-4885.

By submitting a nomination form, you are indicating your willingness and agreement to actively participate in face-to-face meetings and conference calls. Previous drafting or Standard review team experience is beneficial, but not required.

Project Information

Project Purpose

The goal of this project is to match the NERC Glossary of Terms definitions of Generator Owner and Generator Operator with the revised definitions contained in the Rules of Procedure registry criteria for Generator Owner and Generator Operator.

Standards Affected

BAL-001-TRE-2, IRO-010-5, MOD-032-1, PRC-012-2, PRC-017-1, TOP-003-6.1, VAR-001-5, VAR-002-4.1

Nominee Expertise Requested

Generator Owner, Generator Operator will be the primary affected entities. However, other entities have responsibilities with respect to GOs/GOPs under the above-listed standards (e.g. Reliability Coordinator, Balancing Authority, Transmission Operator, Transmission Planner, Planning Coordinator, Resource Planner, Transmission Service Provider).

Time Commitment Expectations

Time commitments for most projects include up to two face-to-face meetings per quarter (on average two full working days each meeting) with conference calls scheduled as needed. Team members can agree to individual or subgroup assignments, hold separate meetings, and present to the full drafting team for discussion and review. Another important component of quality reviews and drafting team efforts is outreach. Members of the team will be expected to conduct industry outreach during the development process to support a successful project outcome.

Project Priority

Each project will be developed according to that project’s priority status. While each standard project addresses particular industry needs, some will be identified as a higher priority. A high priority project can include a strict timeline, which may be needed to effectively respond to a FERC Directive or other factors determined by the NERC Board of Trustees. A high priority project may also need to increase the frequency of meetings at any time throughout the development process to account for project timeline needs. Similarly, low priority projects may adjust to less frequent meetings to reallocate resources to high priority projects.

This project has been identified as high priority at this time.

Name:	
Organization:	
Address:	
Telephone:	
Email:	
Please briefly describe your experience and qualifications to serve on the requested Standard Drafting Team (Bio):	
<p>If you are currently a member of any NERC drafting team, please list each team here:</p> <input type="checkbox"/> Not currently on any active SAR or standard drafting team. <input type="checkbox"/> Currently a member of the following SAR or standard drafting team(s):	
<p>If you previously worked on any NERC drafting team please identify the team(s):</p> <input type="checkbox"/> No prior NERC SAR or standard drafting team. <input type="checkbox"/> Prior experience on the following team(s):	
<p>Acknowledgement that the nominee has read and understands both the <i>NERC Participant Conduct Policy</i> and the <i>Standard Drafting Team Scope</i> documents, available on NERC Standards Resources.</p> <input type="checkbox"/> Yes, the nominee has read and understands these documents.	

Select each NERC Region in which you have experience relevant to the Project for which you are volunteering:

<input type="checkbox"/> MRO	<input type="checkbox"/> SERC	<input type="checkbox"/> NA – Not Applicable
<input type="checkbox"/> NPCC	<input type="checkbox"/> Texas RE	
<input type="checkbox"/> RF	<input type="checkbox"/> WECC	

Select each Industry Segment that you represent:

<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/>	2 — RTOs, ISOs
<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/>	9 — Federal, State, and Provincial Regulatory or other Government Entities
<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities
<input type="checkbox"/>	NA – Not Applicable

Select each Function in which you have current or prior expertise:

<input type="checkbox"/> Balancing Authority	<input type="checkbox"/> Transmission Operator
<input type="checkbox"/> Compliance Enforcement Authority	<input type="checkbox"/> Transmission Owner
<input type="checkbox"/> Distribution Provider	<input type="checkbox"/> Transmission Planner
<input type="checkbox"/> Generator Operator	<input type="checkbox"/> Transmission Service Provider
<input type="checkbox"/> Generator Owner	<input type="checkbox"/> Purchasing-selling Entity
<input type="checkbox"/> Interchange Authority	<input type="checkbox"/> Reliability Coordinator
<input type="checkbox"/> Load-serving Entity	<input type="checkbox"/> Reliability Assurer
<input type="checkbox"/> Market Operator	<input type="checkbox"/> Resource Planner
<input type="checkbox"/> Planning Coordinator	

Provide the names and contact information for two references who could attest to your technical qualifications and your ability to work well in a group:

Name:		Telephone:	
Organization:		Email:	
Name:		Telephone:	
Organization:		Email:	
Provide the name and contact information of your immediate supervisor or a member of your management who can confirm your organization's willingness to support your active participation.			
Name:		Telephone:	
Title:		Email:	

Version History

Version	Date	Revision Details
1.0	7/25/2023	Removed footnote to NERC Functional Model
2.0	8/22/2023	Updated to include project information headers, language regarding time commitments, and project priority

UPDATED

Standards Announcement

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

Drafting Team Nomination Period Now Open through July 18, 2024

Now Available

Nominations are being sought for standard drafting team members. The due date has been extended, and is now open through **8 p.m. Eastern, Thursday, July 18, 2024**.

Use the [electronic form](#) to submit a nomination. Contact [Linda Jenkins](#) regarding issues using the electronic form. An unofficial Word version of the nomination form is posted on the [Standard Drafting Team Vacancies](#) page and the [project page](#).

By submitting a nomination form, you are indicating your willingness and agreement to actively participate in face-to-face meetings and conference calls.

The time commitment for this project is expected to be two face-to-face meetings per quarter (on average two full working days each meeting) with conference calls scheduled as needed to meet the agreed upon timeline the team sets forth. Team members may also have side projects, either individually or by sub-group, to present for discussion and review. Lastly, an important component of the drafting team effort is outreach. Members of the team will be expected to conduct industry outreach during the development process to support a successful ballot.

Previous drafting team experience is beneficial but not required. This project has been identified as **High Priority**. See the project page and nomination form for additional information.

Next Steps

The Standards Committee is expected to appoint members to the drafting team during the Standards Committee meeting immediately following FERC's approval of the changes to the NERC Rules of Procedure. Nominees will be notified shortly after they have been appointed.

For more information on the Standards Development Process, refer to the [Standard Processes Manual](#).

For more information or assistance, contact Senior Standards Developer, [Jessica Harris](#) (via email) or at 404-710-4885. [Subscribe to this project's observer mailing list](#) by selecting "NERC Email Distribution Lists" from

the "Service" drop-down menu and specify "Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)" in the Description Box.



North American Electric Reliability Corporation

3353 Peachtree Rd, NE

Suite 600, North Tower

Atlanta, GA 30326

404-446-2560 | www.nerc.com

Standards Announcement

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

Drafting Team Nomination Period Open through July 1, 2024

[Now Available](#)

Nominations are being sought for standard drafting team members through **8 p.m. Eastern, Monday, July 1, 2024.**

Use the [electronic form](#) to submit a nomination. Contact [Linda Jenkins](#) regarding issues using the electronic form. An unofficial Word version of the nomination form is posted on the [Standard Drafting Team Vacancies](#) page and the [project page](#).

By submitting a nomination form, you are indicating your willingness and agreement to actively participate in face-to-face meetings and conference calls.

The time commitment for this project is expected to be two face-to-face meetings per quarter (on average two full working days each meeting) with conference calls scheduled as needed to meet the agreed upon timeline the team sets forth. Team members may also have side projects, either individually or by sub-group, to present for discussion and review. Lastly, an important component of the drafting team effort is outreach. Members of the team will be expected to conduct industry outreach during the development process to support a successful ballot.

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For more information or assistance, contact Senior Standards Developer, [Jessica Harris](#) (via email) or at 404-710-4885. [Subscribe to this project's observer mailing list](#) by selecting "NERC Email Distribution Lists" from the "Service" drop-down menu and specify "Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)" in the Description Box.



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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:	Generator Owner and Generator Operator Definition Alignment		
Date Submitted:	April 25, 2024		
SAR Requester			
Name:	Alison Oswald		
Organization:	NERC		
Telephone:	404-275-9410	Email:	alison.oswald@nerc.net
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 checked="" type="checkbox"/>	Emerging Risk (Reliability Issues Steering Committee) Identified	<input type="checkbox"/>	Enhanced Periodic Review Initiated
<input type="checkbox"/>	Reliability Standard Development Plan	<input 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?):			
<p>The project will address concerns regarding the reliability impacts of inverter-based resources (IBRs) on the Bulk-Power System that do not meet the current definition of Bulk Electric System (BES) and have not historically been required to be registered with NERC for compliance with the NERC Reliability Standards. Such concerns are discussed in detail in the Federal Energy Regulatory Commission (FERC) November 17, 2022 order in Docket No. RD22-4-000, in which FERC directed NERC to develop a work plan to address the registration of these IBRs and ensure their compliance with Reliability Standards by certain milestone dates. <i>See Registration of Inverter-Based Resources</i>, 181 FERC ¶ 61,124 (Nov. 17, 2022).</p> <p>In March 2024, NERC proposed changes to its Rules of Procedure registry criteria to include certain non-BES IBRs in the Generator Owner (GOs) and Generator Operator (GOP) categories. Revising the GO and GOP definitions in the NERC Glossary of Terms to match the registry criteria will ensure these previously</p>			

Requested information
unregistered IBRs will be subject to the NERC Reliability Standards and mitigate their impacts on the BPS.
Purpose or Goal (What are the reliability gap(s) or risk(s) to the BES being addressed, and how does this proposed project provide the reliability-related benefit described above?):
The goal of this project is to match the NERC Glossary of Terms definitions of Generator Owner and Generator Operator with the revised definitions contained in the Rules of Procedure registry criteria for Generator Owner and Generator Operator.
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Match the NERC Glossary of Terms with the definitions contained in the Rules of Procedure for Generator Owner and Generator Operator and propose an implementation plan for these definitions that is consistent with the November 17, 2022 FERC order.
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<p>The definitions of Generator Owner and Generator Operator in the NERC Rules of Procedure were revised in March 2024 to address the FERC directives from the November 17, 2022 order and NERC’s work plan for implementing that order. These revisions were filed with FERC March 19, 2024; NERC requested expedited action by June 2024.</p> <p>The NERC Glossary of Terms should be revised to match the definitions that FERC approves in the Rules of Procedure registry criteria. This team should also develop an implementation plan for applicable standards consistent with FERC’s November 17, 2022 IBR Registration order. Standards that may be applicable following a definition change include the following:</p> <ul style="list-style-type: none"> ▪BAL-001-TRE-2 ² ▪IRO-010-5 ▪MOD-032-1 ▪PRC-012-2 ▪PRC-017-1 ▪TOP-003-6.1 ▪VAR-001-5 ▪VAR-002-4.1
Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):

¹ 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.

² The Drafting team should collaborate with NERC and Regional Entity staff in the review and implementation of this standard.

Requested information	
The cost impact is unknown at this time. Updating the GO/GOP definitions in conjunction with the NERC Registry Criteria will ensure that new entities are registered as GOs or GOPs and must be compliant with NERC Reliability Standards.	
Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):	
This project will impact current non-BES IBRs with aggregate nameplate capacity greater than or equal to 20 MVA connected at a voltage greater than or equal to 60kv.	
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:	
Generator Owner, Generator Operator will be the primary affected entities. However, other entities have responsibilities with respect to GOs/GOPs under the above-listed standards (e.g. Reliability Coordinator, Balancing Authority, Transmission Operator, Transmission Planner, Planning Coordinator, Resource Planner, Transmission Service Provider).	
Do you know of any consensus building activities ³ in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.	
The Rules of Procedure changes including the new GO/GOP registry criteria definitions went through a formal comment process where input was solicited from industry before the final revisions. Additional information can be found here .	
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)?	
None	
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.	
None. The Glossary definitions of Generator Owner/Generator Operator must match those in the Rules of Procedure registry criteria to avoid conflict and confusion.	

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 checked="" 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 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.

³ 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.

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
n/a	n/a

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 checked="" 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

Unofficial Comment Form

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

Do not use this form for submitting comments. Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments on **Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)** Standard Authorization Request (SAR) by **8 p.m. Eastern, Tuesday, August 20, 2024**.

Additional information is available on the [project page](#). If you have questions, contact Senior Standards Developer, [Jessica Harris](#) (via email) or at 404-710-4885.

Background Information

The project will address concerns regarding the reliability impacts of inverter-based resources (IBRs) on the Bulk-Power System that do not meet the current definition of Bulk Electric System (BES) and have not historically been required to be registered with NERC for compliance with the NERC Reliability Standards. Such concerns are discussed in detail in the Federal Energy Regulatory Commission (FERC) November 17, 2022 order in [Docket No. RD22-4-000](#), in which FERC directed NERC to develop a work plan to address the registration of these IBRs and ensure their compliance with Reliability Standards by certain milestone dates. See Registration of Inverter-Based Resources, 181 FERC ¶ 61,124 (Nov. 17, 2022).

In March 2024, NERC proposed changes to its Rules of Procedure registry criteria to include certain non-BES IBRs in the Generator Owner (GOs) and Generator Operator (GOP) categories. Revising the GO and GOP definitions in the NERC Glossary of Terms to match the registry criteria will ensure these previously unregistered IBRs will be subject to the NERC Reliability Standards and mitigate their impacts on the BPS. On June 27, 2024 FERC approved the proposed revisions to the NERC Rules of Procedure.¹ Per the ruling:

Pursuant to section 215(f) of the FPA, we approve NERC's proposed revisions to its Rules of Procedure as just, reasonable, not unduly discriminatory or preferential, and in the public interest because these revisions should ensure that unregistered IBRs will become subject to Reliability Standards currently applicable to generator owners and operators in May 2026 and then become subject to additional Reliability Standards following the implementation of projects developed in accordance with Order No. 901.²

This project will continue to be apprised of updates to the NERC IBR Registration Initiative³ to ensure reasonable effective dates are implemented and consistent with the NERC Registration Rollout strategy for Category 2 Generator Owners and Generator Operators.

¹ <https://www.ferc.gov/media/e-6-rr24-2-000>

² Ibid at P 1.

³ https://www.nerc.com/pa/Documents/IBR_Quick%20Reference%20Guide.pdf

Questions

1. With revisions to Generator Owner and Generator Operator definitions, as proposed in the SAR to align with the June 27 FERC approval change of the registration criteria to the NERC Rules of Procedure, is there any other information that the team should consider when making these revisions?

Yes

No

Comments:

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

Comments:

Standards Announcement

Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) Standard Authorization Request

Formal Comment Period Open through August 20, 2024

[Now Available](#)

A formal comment period for the **Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)** Standard Authorization Request (SAR), is open through **8 p.m. Eastern, Tuesday, August 20, 2024.**

Commenting

Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments. An unofficial Word version of the comment form is posted on the [project page](#).

- *Contact NERC IT support directly at <https://support.nerc.net/> (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.*
- *Passwords expire every **6 months** and must be reset.*
- *The SBS **is not** supported for use on mobile devices.*
- *Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.*

Next Steps

The drafting team will review all responses received during the comment period and determine the next steps of the project.

For information on the Standards Development Process, refer to the [Standard Processes Manual](#).

For more information or assistance, contact Senior Standards Developer, [Jessica Harris](#) (via email) or at 404-710-4885. [Subscribe to this project's observer mailing list](#) by selecting "NERC Email Distribution Lists" from the "Service" drop-down menu and specify "Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)" in the Description Box.



North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Comment Report

Project Name: 2024-01 Rules of Procedure Definitions Alignment (GO and GOP) | Standard Authorization Request
Comment Period Start Date: 7/2/2024
Comment Period End Date: 8/20/2024
Associated Ballots:

There were 24 sets of responses, including comments from approximately 81 different people from approximately 56 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

- 1. With revisions to Generator Owner and Generator Operator definitions, as proposed in the SAR to align with the June 27 FERC approval change of the registration criteria to the NERC Rules of Procedure, is there any other information that the team should consider when making these revisions?**
- 2. Provide any additional comments for the SAR 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	1,3,5	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
Southwest Power Pool Regional Entity	Deborah Currie	2	MRO,WECC	IRC SRC	Charles Yeung	Southwest Power Pool	1	MRO
					Ali Miremadi	CAISO	1	WECC
					Helen Lainis	IESO	1	NPCC
					Matt Goldberg	ISO-NE	1	NPCC
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Elizabeth Davis	PJM	1	RF
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
FirstEnergy - FirstEnergy Corporation	Mark Garza	1,3,4,5,6		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

Black Hills Corporation	Rachel Schuldt	1,3,5,6		Black Hills Corporation - All Segments	Micah Runner	Black Hills Corporation	1	WECC
					Josh Combs	Black Hills Corporation	3	WECC
					Rachel Schuldt	Black Hills Corporation	6	WECC
					Carly Miller	Black Hills Corporation	5	WECC
					Sheila Suurmeier	Black Hills Corporation	5	WECC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	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
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC

					David Kwan	Ontario Power Generation	4	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
					Sean Cavote	PSEG	4	NPCC
					Jason Chandler	Con Edison	5	NPCC
					Tracy MacNicoll	Utility Services	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
					Jeffrey Streifling	NB Power Corporation	1,4,10	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
					Chantal Mazza	Hydro Quebec	1	NPCC
					Nicolas Turcotte	Hydro Quebec	2	NPCC
Western Electricity Coordinating Council	Steven Rueckert	10		WECC	Steve Rueckert	WECC	10	WECC
					Curtis Crews	WECC	10	WECC

1. With revisions to Generator Owner and Generator Operator definitions, as proposed in the SAR to align with the June 27 FERC approval change of the registration criteria to the NERC Rules of Procedure, is there any other information that the team should consider when making these revisions?

Teresa Krabe - Lower Colorado River Authority - 1,5

Answer No

Document Name

Comment

Nothing more at this time.

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

None at this time.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 3,4,5,6

Answer Yes

Document Name

Comment

Please refer to the SAR submitted by TAPS, APPA, and others which we feel better clarifies new IBR related definitions.

Likes 1

Oklahoma Municipal Power Authority, 5, Tuttle Patrick

Dislikes 0

Response

Thomas Foltz - AEP - 3,5,6

Answer Yes

Document Name

Comment

Once the definitions are implemented, Transmission Owners and Transmission Operators will be tasked with obtaining obligation-driven data (VAR-001 and TOP-003 for example) from entities who were not previously NERC-registered entities. Care must be taken to craft reasonable Implementation Plans, perhaps staggered as necessary, so that reasonable time is afforded to identify these entities and make arrangements to obtain the necessary data. Specifically, Transmission Owners and Operators with large footprints would be especially challenged by this, as they will have numerous, newly registered entities to identify and obtain data from.

Likes 0

Dislikes 0

Response**Kimberly Turco - Constellation - 5,6****Answer**

Yes

Document Name**Comment**

Constellation feels the SAR is confusing and could include a definition for sub-BES IBRs to later subject these non-BES IBRs to NERC reliability standards.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response**Alison MacKellar - Constellation - 5,6****Answer**

Yes

Document Name**Comment**

Constellation feels the SAR is confusing and could include a definition for sub-BES IBRs to later subject these non-BES IBRs to NERC reliability standards.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro

Answer Yes

Document Name

Comment

1. The draft SAR lists the Standards identified as directly applicable following the revision of the GO and GOP Glossary of Terms definitions. While the SAR acknowledges that “other entities have responsibilities with respect to GOs/GOPs under the above-listed standards (e.g. Reliability Coordinator, Balancing Authority, Transmission Operator, Transmission Planner, Planning Coordinator, Resource Planner, Transmission Service Provider)”, it also states that “This project will impact current non-BES IBRs with aggregate nameplate capacity greater than or equal to 20 MVA connected at a voltage greater than or equal to 60kv”.

BC Hydro suggests revising to alleviate this apparent discrepancy as these Standards will impact other entities with obligations of RC, BA, etc.

2. Once the revised GO and GOP definitions that will include non-BES generating facilities are in effect, the resulting increased number of entities and/or facilities in scope will also impact other existing Standards that have entities such as RC, PC, TP, BA, TOP who will have responsibilities with respect to the new GO/GOPs added under the revised definition.

For example, COM-001-3 Requirement R1 mandates that the TOP has Interpersonal Communication capabilities with each adjacent GOP in its Transmission Operator Area. Therefore, the TOP will need to ensure it meets its compliance obligations for an expanded footprint including new GOP entities. Similarly, VAR-001-5 R5 requires the TOP to provide GOPs with voltage or Reactive Power schedules and notification requirements.

BC Hydro recommends that the SAR should include additional considerations on such indirect impacts, and provisions for an implementation plan that allows all potentially impacted entities (e.g. RC, BA, TOP, PC, TP) adequate time to accommodate increased compliance scope post registration of new entities and/or facilities.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Duke Energy agrees with and recommends implementation of NAGF and EEI comments.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments

Answer Yes

Document Name

Comment

Black Hills Corporation agrees with the comments from EEI and NAGF:

While EEI does not oppose this SAR, we are concerned that the definitions contained in the NERC Rules of Procedure (Appendix 5B; Statement of Compliance Registry Criteria, Revision 8) do not have sufficient details to ensure consistent and unambiguous application within the NERC Reliability Standards. To address this concern, we recommend, similar to what was done with the Bulk Electric System definition, a companion Definition Reference document be developed for industry review, comment, and approval as a critical component of this project.

EEI also recommends that in addition to the development of the implementation plans for the identified Reliability Standards identified in this SAR, the DT should consider doing a comprehensive assessment of all other NERC Reliability Standards that contain applicability for GOs and GOPs to ensure the obligations under those standards are not impacted in ways that might not be intended with the changes to these two definitions.

The NAGF recommends that the "Other" check box be selected and specify "Implementation Plan development" in the SAR Type section to support the implementation plan to be created for the revised Generator Owner/Generator Operator (GO/GOP) definitions.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer Yes

Document Name

Comment

FirstEnergy supports EEI comments that state:

EEI does not support this SAR as currently drafted because it inappropriately plans to duplicate within the NERC Glossary of Terms the definitions for Generator Owner and Generator Operator as developed for use in the NERC Rules of Procedure (Appendix 5B; Statement of Compliance Registry Criteria, Revision 8), which is a document used for a different purpose from the definitions used in NERC Reliability Standards. We are also concerned that if these definitions are simply duplicated/mirrored without further clarification, those definitions would require all IBRs, regardless of size, ownership or method of control to be included in the NERC Reliability Standards, if those resources were connected at 60kV or above and aggregate to 20MVA or above on a single feeder. EEI does not agree that this was the intent of this project and therefore does not support this proposed change.

We are also concerned that there is nothing in this SAR that would obligate the DT to conduct an analysis/assessment of the impacts of these proposed changes on the full body of NERC Reliability Standards, which is required whenever a NERC Glossary Terms definition is modified. To address our concerns, we offer the following changes to the proposed SAR (in boldface below):

Purpose or Goal:

The goal of this project is to **revise the** NERC Glossary of Terms definitions **for** Generator Owner and Generator Operator **to include generator owners and operators that own and maintain non-BES inverter based generating resources (IBRs) that have an aggregate nameplate capacity**

of greater than or equal to 20 MVA, are operated together through a common facility-level controller as a single resource and 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.

Project Scope:

Revise the NERC Glossary of Terms definitions for Generator Owner and Generator Operator **to include generator owners and operators that own and maintain non-BES inverter based generating resources (IBRs) that have an aggregate nameplate capacity of greater than or equal to 20 MVA, are operated together through a common facility-level controller as a single resource and 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 and are controlled by a common plant controller** and propose an implementation plan for these definitions that is consistent with the November 17, 2022 FERC order.

Detailed Description:

Revise the definitions for Generator Owner and Generator Operator in the NERC Glossary of Terms to include generator owners and operators that own and maintain non-BES inverter based generating resources (IBRs) that have an aggregate nameplate capacity of greater than or equal to 20 MVA, are operated together through a common facility-level controller as a single resource and 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 and are controlled by a common plant controller

This **drafting team (DT)** should also **assess the impact of these changes on all affected NERC Reliability Standards and** develop an implementation plan for **those standards affected**, consistent with FERC's November 17, 2022 IBR Registration order.

Further, FirstEnergy asks for clarification of connections through the Distribution that would fall under the scope of the NERC Glossary of Terms and pending standards to ensure the assigned responsibility be defined for the GO and GOP.

We find situations on the Distribution side has little impact on the Transmission System and by clearly declaring this separation would ease monitoring, operating and reporting from the Distribution System that would otherwise be held for the Transmission System.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer

Yes

Document Name

Comment

Ameren would like more clarity around what NERC is asking for if these changes have already been incorporated into the Rules of Procedure and approved. Additionally, we agree with EEI's and NAGF's comments.

Likes 0

Dislikes 0

Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
<p>Please add the development of a Category 2 GO/GOP Definition Reference Document to this SAR explaining how to apply the Category 2 GO/GOP definition, similar to the BES Definition Reference Document that was developed for the application of the BES Definition.</p> <p>Please add that FERC approved the revised NERC Rules of Procedure on June 27, 2024, regarding the definitions of GO and GOP.</p> <p>Please add that a comprehensive assessment of all NERC Reliability Standards applicable to the GO and GOP functions should be done regarding the development of the implementation plan.</p>	
Likes	0
Dislikes	0

Response	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	Yes
Document Name	
Comment	
<p><i>The NAGF recommends that the "Other" check box be selected and specify "Implementation Plan development" in the SAR Type section to support the implementation plan to be created for the revised Generator Owner/Generator Operator (GO/GOP) definitions.</i></p>	
Likes	0
Dislikes	0

Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	

While EEI does not oppose this SAR, we are concerned that the definitions contained in the NERC Rules of Procedure (Appendix 5B; Statement of Compliance Registry Criteria, Revision 8) do not have sufficient details to ensure consistent and unambiguous application within the NERC Reliability Standards. To address this concern, we recommend, similar to what was done with the Bulk Electric System definition, a companion Definition Reference document be developed for industry review, comment, and approval as a critical component of this project.

EEI also recommends that in addition to the development of the implementation plans for the identified Reliability Standards identified in this SAR, the DT should consider doing a comprehensive assessment of all other NERC Reliability Standards that contain applicability for GOs and GOPs to ensure the obligations under those standards are not impacted in ways that might not be intended with the changes to these two definitions.

Likes 0

Dislikes 0

Response

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer

Yes

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the North American Generator Forum (NAGF) on question 1

Likes 0

Dislikes 0

Response

Deborah Currie - Southwest Power Pool Regional Entity - 2 - MRO, Group Name IRC SRC

Answer

Yes

Document Name

Comment

The proposed SAR indicates that the Standard Drafting Team (SDT) should develop an implementation plan or plans for applicable standards consistent with FERC's November 17, 2022 IBR Registration order and provides a discrete list of standards that the SDT may need to address. The ISO/RTO Council (IRC) Standards Review Committee (SRC) is uncertain whether the SAR is directing the drafting team to develop a single, comprehensive implementation plan that addresses all applicable standards or a series of individual implementation plans, each of which addresses only one of the applicable standards. The SRC recommends that the SAR be revised to clarify which approach the drafting team is required to take, or whether the drafting team has the flexibility to choose either approach.

The SRC also believes the SAR should be more definitive about the need for the SDT to develop an implementation plan or plans for applicable standards. Instead of suggesting a set of standards that "may" be applicable, the SAR should positively identify all standards that the SDT should consider for applicability. Any standard that is currently applicable to GOs or GOPs should be considered for applicability – some standards that are conspicuously absent from the list in the SAR include: MOD-026-1, MOD-027-1, PRC-024-3, and PRC-025-2 - especially when the SAR section about

other standards that should be assessed for impact identifies "none". The SAR must be clear to ensure all known standards are identified, however through the course of SDT discussions and the comment process, there may be a need for the SDT to address standards not identified at the SAR stage.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

ERCOT joins the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and adopts them as its own.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Yes

Document Name

Comment

AZPS supports the following comments that were submitted by EEI on behalf of its members:

While EEI does not oppose this SAR, we are concerned that the definitions contained in the NERC Rules of Procedure (Appendix 5B; Statement of Compliance Registry Criteria, Revision 8) do not have sufficient details to ensure consistent and unambiguous application within the NERC Reliability Standards. To address this concern, we recommend, similar to what was done with the Bulk Electric System definition, a companion Definition Reference document be developed for industry review, comment, and approval as a critical component of this project.

EEI also recommends that in addition to the development of the implementation plans for the identified Reliability Standards identified in this SAR, the DT should consider doing a comprehensive assessment of all other NERC Reliability Standards that contain applicability for GOs and GOPs to ensure the obligations under those standards are not impacted in ways that might not be intended with the changes to these two definitions.

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Van Gheem - Radian Generation - NA - Not Applicable - NA - Not Applicable

Answer

Document Name

Comment

1. We observe that a second Standard Authorization Request (SAR) has been assigned to this project. That second SAR is significantly different. We believe the NERC Standards Committee should receive comments from both requests before directing a Standard Drafting Team (SDT) to proceed. Under this SAR, we understand the SDT was to revise the definitions of Generator Owner and Generator Operator with the language recently adopted under Appendix 2 of the NERC Rules of Procedure. This revision would split the current definitions into two separate categories with Category 1 defining the existing set of registered entities. While this approach does appear less complex than the second SAR:
 - i. We believe the NERC Standards Committee should delay action on this SAR to consult with the Compliance & Certification Committee (CCC). This would allow the CCC an opportunity in providing input on the consolidation of the two SARs and developing recommendations on specific skill sets that SDT candidates should possess to ensure the Standards Committee has qualified candidates to choose from when selecting the SDT members. Such an opportunity is in alignment with the CCC's ongoing responsibilities to support the rollout of key ERO Enterprise Compliance Monitoring and Enforcement activities.
 - ii. We believe NERC Staff should circulate a list of all NERC and Regional Reliability Standards that have an applicability of Generator Owner and Generator Operator that would be impacted by the change in definitions. We understand a similar list was circulated within the ERO Enterprise in late 2023 but was never formally shared with industry. The formal publication of that list will provide some initial insight.
 - iii. We believe this project's SDT should initially collect informal stakeholder feedback from various technical workshops. These workshops should individually focus on specific Reliability Standard Families, scheduled far enough in advance to gain industry support, and scheduled far enough apart to obtain constructive comments by limited industry resources. A period of two months between workshops should be sufficient to allow adequate participation.

Likes 0

Dislikes 0

Response

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

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC

Answer

Document Name

Comment

WECC suggests the DT consider excluding BAL-001-TRE-2 and delegate the change to Texas RE. The changes to the other Standards should not be delayed or inhibited because of possible additional efforts at the Regional level. There is the possibility that Texas RE participants may not agree to the same language or be on the same approval schedule based on the Regional Standards Development Process. As the Standard is a Regional Standard, Texas RE should handle the efforts and collaboration with NERC be handled accordingly.

SAR should also address other issues within the list of Standards. Case in point, consider adjustments to PRC-005-6 as PRC-017-1 will be retired March 31, 2027 per the PRC-005-2(i) and PRC-005-6 Implementation Plan. If the SAR team decides to make the change to applicability in PRC-017-1 it appears to be effort that will need to be spent again on PRC-005-6. Additionally, there are changes needed in PRC-017-1 that were not addressed during the development of the “new” RAS definition. Particularly, R2 references a “Regional Reliability Organization”, fails to utilize approved template language in the latter parts (e.g., “D: Compliance”), fails to identify Data Retention levels, and does not reflect VSL/VRF correctly. It would be more effective use of the teams time to address PRC-005-6.

The WECC Variance in VAR-001-5 is more than a simple applicability change. The approved definition of Generator Operator is:

“Generator Operator” means the entity that: 1) operates generating Facility(ies) and performs the functions of supplying energy and Interconnected Operations Services (Category 1 GOP); or 2) operates non-BES inverter based generating resources that either have or contribute to an aggregate 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 (Category 2 GOP).”

The WECC Variance completely changes Requirement R4 and R5 of the nationwide Standard and provides new language (Requirement R4 is deleted and R5 language was replaced). In E.A.13 the phrasing requires significant change as it currently states “Each.....to the Generator Operators for each of their generation resources that are on-line and part of the Bull Electric System within the Transmission Operator Area...” Significant issues to consider- Category 2 GOP operates “non-BES inverter based resources” which means for inclusion of Category 2 GOP in the WECC Interconnection for VAR-001-5 requires E.A. 13 changes in language. Additionally, the definition and use of Transmission Operator Area does not support non-BES inverter based generating resources. TOP Area definition is: “The collection of Transmission assets over which the Transmission Operator is responsible for operating. “ The definition of “Transmission” (used within TOP Area definition) is “An interconnected group of lines and associated equipment for the movement or transfer of electric energy between points of supply and points at which it is transformed for delivery to customers or is delivered to other electrical systems.” A TO may not have “lines and associated equipment” at the locations specified in the Transmission definition for the TOP to be responsible for operating.

WECC Variance E.A.14 language brings its own set of issues (e.g., What is considered the “point of interconnection”?) that will likely require language changes.

E.A.17 applicability for non-BES inverter-based generating resources would need researched to ensure the capability exists and would likely require language changes.

WECC will initiate a SAR to update the WECC Variance in VAR-001-5 and upon completion submit the proposed revisions to NERC for BOT approval and subsequent FERC filing.

For VAR-002-4.1 there is a footnote (Footnote 5) in Requirement R5 that would need revised that could impact language within the Requirement.

In short, WECC supports the approach to consistency and applicability but there are additional issues (in terms of applicability) that may need addressed in Requirement language to actually make GO/GOP Category 2 entities responsible for the actions within some of the Standards listed. It is

understood that this is a definition change and is not specifically addressing Standards changes as a result of the definition change, but the indication of applicability needs some more review regarding some of the Standards noted above.

Likes 0

Dislikes 0

Response

Brian Van Gheem - Radian Generation - NA - Not Applicable - NA - Not Applicable

Answer

Document Name

Comment

1. Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Deborah Currie - Southwest Power Pool Regional Entity - 2 - MRO, Group Name IRC SRC

Answer

Document Name

Comment

The implementation plan or plans developed by the SDT will lay out when each applicable Reliability Standard will become enforceable for the GO/GOP Category 2 entities. When the implementation plan or plans are posted so that the GO/GOP Category 2 entities will know when they are subject to compliance, the SRC notes that the entities responsible for modeling the Category 2 assets will also need to be informed of the implementation dates and provided with contact information for Category 2 entities.

Finally, the SRC notes that the project scope is very brief and only includes a task of matching the GO/GOP definition in the NERC Glossary of Terms with the Rules of Procedure. The detailed description goes on to identify a need to develop an implementation plan or plans that will impact many Reliability Standards. The need to develop an implementation plan or plans that will impact multiple standards is a significant part of this project and should be identified within the project scope.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Document Name

Comment

NAGF membership provides the following items for consideration: Consider the example of GO/GOP facilities connected at 69kV that are not connected to BES transmission and as such, the transmission facility could be owned by a non-registered entity. If this is the case, it is not clear who their PC, TO, TOP or TP would be. NAGF members have seen instances where TPs tell registered BES generators that they are not their TP and the Regional Entity tells the GO that they are. NERC will need to assist new entry GO/GOP facilities to resolve such issues.

Under VAR-001, the TOP must provide a voltage schedule to the GOP and then VAR-002 requires the GOP to maintain that schedule or notify the TOP. It is not clear if the voltage schedule must come from a registered TOP or if the voltage schedule is expected to come from the non-registered owner of the 69kV line. If the owner of the 69 kV line is not a registered TOP, is the expectation that a registered TOP will provide a schedule that supersedes the 69kV line's owners schedule?

For the Standards listed in the SAR, the above issues will cause registration and enforcement problems with the VAR Standards, MOD-032 and TOP-003. These issues must be addressed prior to or in parallel with GO/GOP definition changes.

Likes 0

Dislikes 0

Response

Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Document Name

Comment

BPA recognizes the need for changes regarding the IBR. BPA has no comments at this time but does support the need to define IBR characteristics.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer

Document Name

Comment

Terms already finalized without industry input and now is at mercy of FERC already approving. The process of assigning a project and posting a SAR for items and actions that NERC has already been initiated into their Registration seems out of step. FirstEnergy questions if this is going to be the normal mode of operation and request future integrations include the opportunity for industry input.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE supports the objective of the SAR to align the NERC Glossary of Terms definitions of Generator Owner and Generator Operator with the revised definitions contained in the Rules of Procedure registry criteria for Generator Owner and Generator Operator.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments

Answer

Document Name

Comment

Black Hills Corporation agrees with the additional comments provided by NAGF.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Duke Energy agrees with and recommends implementation of NAGF comments.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5,6

Answer

Document Name

Comment

Constellation feels the line should be drawn on what is subject to NERC standards as many small behind the meter IBR facilities would not be economical to run if subjected to NERC tests and modeling requirements.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5

Answer

Document Name

Comment

Definitions should align exactly with one another.

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 1 - NPCC

Answer

Document Name

Comment

Please change the sentence "these ROP changes are pending before FERC" to reflect FERC approval of the ROP changes on June 27th in docket RR24-2-000.

Please change "a definition of Inverter Based Resources is being developed" to has been developed and recently approved in project 2020-06.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer

Document Name

Comment

Constellation feels the line should be drawn on what is subject to NERC standards as many small behind the meter IBR facilities would not be economical to run if subjected to NERC tests and modeling requirements.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 3,4,5,6

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Consideration of Comments

Project Name: 2024-01 Rules of Procedure Definitions Alignment (GO and GOP) | Standard Authorization Request

Comment Period Start Date: 7/2/2024

Comment Period End Date: 8/20/2024

Associated Ballot(s):

There were 24 sets of responses, including comments from approximately 81 different people from approximately 56 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, contact Manager of Standards Information, [Nasheema Santos](#) (via email) or at (404) 290-6796.

Questions

1. With revisions to Generator Owner and Generator Operator definitions, as proposed in the SAR to align with the June 27 FERC approval change of the registration criteria to the NERC Rules of Procedure, is there any other information that the team should consider when making these revisions?
2. Provide any additional comments for the SAR drafting team to consider, if desired.

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

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	1,3,5	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
Southwest Power Pool Regional Entity	Deborah Currie	2	MRO,WECC	IRC SRC	Charles Yeung	Southwest Power Pool	1	MRO
					Ali Miremadi	CAISO	1	WECC
					Helen Lainis	IESO	1	NPCC
					Matt Goldberg	ISO-NE	1	NPCC
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Elizabeth Davis	PJM	1	RF
Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE					
FirstEnergy - FirstEnergy Corporation	Mark Garza	1,3,4,5,6		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
Black Hills Corporation	Rachel Schuldt	1,3,5,6		Black Hills Corporation - All Segments	Micah Runner	Black Hills Corporation	1	WECC
					Josh Combs	Black Hills Corporation	3	WECC
					Rachel Schuldt	Black Hills Corporation	6	WECC
					Carly Miller	Black Hills Corporation	5	WECC
					Sheila Suurmeier	Black Hills Corporation	5	WECC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	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
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
David Kwan	Ontario Power Generation	4	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
Sean Cavote	PSEG	4	NPCC
Jason Chandler	Con Edison	5	NPCC

Tracy MacNicoll	Utility Services	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
Jeffrey Streifling	NB Power Corporation	1,4,10	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
					Chantal Mazza	Hydro Quebec	1	NPCC
					Nicolas Turcotte	Hydro Quebec	2	NPCC
Western Electricity Coordinating Council	Steven Rueckert	10		WECC	Steve Rueckert	WECC	10	WECC
					Curtis Crews	WECC	10	WECC

1. With revisions to Generator Owner and Generator Operator definitions, as proposed in the SAR to align with the June 27 FERC approval change of the registration criteria to the NERC Rules of Procedure, is there any other information that the team should consider when making these revisions?

Teresa Krabe - Lower Colorado River Authority - 1,5

Answer No

Document Name

Comment

Nothing more at this time.

Likes 0

Dislikes 0

Response

Thank you for your participation.

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

None at this time.

Likes 0

Dislikes 0

Response

Thank you for your participation.

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your participation.

Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Thank you for your participation.

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC

Answer No

Document Name

Comment

Likes	0	
Dislikes	0	
Response		
Thank you for your participation.		
Marty Hostler - Northern California Power Agency - 3,4,5,6		
Answer	Yes	
Document Name		
Comment		
Please refer to the SAR submitted by TAPS, APPA, and others which we feel better clarifies new IBR related definitions.		
Likes	1	Oklahoma Municipal Power Authority, 5, Tuttle Patrick
Dislikes	0	
Response		
Thank you for your participation and comment. The drafting team will be working to address and incorporate the mentioned SAR.		
Thomas Foltz - AEP - 3,5,6		
Answer	Yes	
Document Name		
Comment		
Once the definitions are implemented, Transmission Owners and Transmission Operators will be tasked with obtaining obligation-driven data (VAR-001 and TOP-003 for example) from entities who were not previously NERC-registered entities. Care must be taken to craft reasonable Implementation Plans, perhaps staggered as necessary, so that reasonable time is afforded to identify these entities and make arrangements to obtain the necessary data. Specifically, Transmission Owners and Operators with large footprints would be especially challenged by this, as they will have numerous, newly registered entities to identify and obtain data from.		

Likes	0
Dislikes	0
Response	
Thank you for your participation and comment. The drafting team is in full agreement and will work diligently to keep this in the forefront of our thoughts throughout this process. The drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.	
Kimberly Turco - Constellation - 5,6	
Answer	Yes
Document Name	
Comment	
Constellation feels the SAR is confusing and could include a definition for sub-BES IBRs to later subject these non-BES IBRs to NERC reliability standards.	
Kimberly Turco on behalf of Constellation Segments 5 and 6	
Likes	0
Dislikes	0
Response	
Thank you for your participation and comment. Your concern has been addressed in a second SAR, in which this drafting team will also address.	
Alison MacKellar - Constellation - 5,6	
Answer	Yes
Document Name	
Comment	

Constellation feels the SAR is confusing and could include a definition for sub-BES IBRs to later subject these non-BES IBRs to NERC reliability standards.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Thank you for your participation and comment. Your concern has been addressed in a second SAR (the SAR submitted by TAPS), in which this drafting team will also address.

Adrian Andreoiu - BC Hydro and Power Authority - 1,3,5, Group Name BC Hydro

Answer Yes

Document Name

Comment

1. The draft SAR lists the Standards identified as directly applicable following the revision of the GO and GOP Glossary of Terms definitions. While the SAR acknowledges that “other entities have responsibilities with respect to GOs/GOPs under the above-listed standards (e.g. Reliability Coordinator, Balancing Authority, Transmission Operator, Transmission Planner, Planning Coordinator, Resource Planner, Transmission Service Provider)”, it also states that “This project will impact current non-BES IBRs with aggregate nameplate capacity greater than or equal to 20 MVA connected at a voltage greater than or equal to 60kv”.

BC Hydro suggests revising to alleviate this apparent discrepancy as these Standards will impact other entities with obligations of RC, BA, etc.

2. Once the revised GO and GOP definitions that will include non-BES generating facilities are in effect, the resulting increased number of entities and/or facilities in scope will also impact other existing Standards that have entities such as RC, PC, TP, BA, TOP who will have responsibilities with respect to the new GO/GOPs added under the revised definition.

For example, COM-001-3 Requirement R1 mandates that the TOP has Interpersonal Communication capabilities with each adjacent GOP in its Transmission Operator Area. Therefore, the TOP will need to ensure it meets its compliance obligations for an expanded footprint including new GOP entities. Similarly, VAR-001-5 R5 requires the TOP to provide GOPs with voltage or Reactive Power schedules and notification requirements.

BC Hydro recommends that the SAR should include additional considerations on such indirect impacts, and provisions for an implementation plan that allows all potentially impacted entities (e.g. RC, BA, TOP, PC, TP) adequate time to accommodate increased compliance scope post registration of new entities and/or facilities.

Likes 0

Dislikes 0

Response

Thank you for your participation and recommendation. The drafting team recognizes the potential for indirect impacts as indicated in your comment and mentioned within the SAR on page 3. As part of the SAR, the drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

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

Answer Yes

Document Name

Comment

Duke Energy agrees with and recommends implementation of NAGF and EEI comments.

Likes 0

Dislikes 0

Response

Thank you for your participation. Please see the drafting team's response to NAGF and EEI comments.

Rachel Schuldts - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments	
Answer	Yes
Document Name	
Comment	
<p>Black Hills Corporation agrees with the comments from EEI and NAGF:</p> <p>While EEI does not oppose this SAR, we are concerned that the definitions contained in the NERC Rules of Procedure (Appendix 5B; Statement of Compliance Registry Criteria, Revision 8) do not have sufficient details to ensure consistent and unambiguous application within the NERC Reliability Standards. To address this concern, we recommend, similar to what was done with the Bulk Electric System definition, a companion Definition Reference document be developed for industry review, comment, and approval as a critical component of this project.</p> <p>EEI also recommends that in addition to the development of the implementation plans for the identified Reliability Standards identified in this SAR, the DT should consider doing a comprehensive assessment of all other NERC Reliability Standards that contain applicability for GOs and GOPs to ensure the obligations under those standards are not impacted in ways that might not be intended with the changes to these two definitions.</p> <p>The NAGF recommends that the “Other” check box be selected and specify “Implementation Plan development” in the SAR Type section to support the implementation plan to be created for the revised Generator Owner/Generator Operator (GO/GOP) definitions.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your participation. Please see the drafting team's response to EEI and NAGF comments:</p> <p>As detailed in the Enhancing NERC Standard Processes document, recommendation 2c states: “NERC Staff recommends that the Standards Committee, working with NERC Staff, provide guidance to drafting teams on how they should approach the SAR phase for a given project. Drafting teams should describe accurately the scope of the issue, the technical foundation, and, where appropriate, provide illustrative solutions that could be considered. The drafting team, however, should not attempt to limit potential outcomes through prescriptive or limiting language, which could hamper a drafting team’s ability to consider alternate approaches raised by stakeholders during comment periods.” The purpose of the SAR is to document “why” a project is needed rather than “how” project objectives will be achieved or</p>	

implemented. As such the drafting team will modify the Generator Owner and Generator Operator definitions as described in the SAR and develop an implementation plan which supports the modifications. The drafting team will take your Definition Reference Document recommendation into consideration, in which the industry may use the document as an additional tool.

As part of the SAR, the drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

As a drafting team develops a proposed Reliability Standard, they are required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. The minimum requirements are outlined in the NERC Standard Processes Manual of Appendix 3A Section 4.4.3.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer	Yes
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Document Name	
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Comment

FirstEnergy supports EEI comments that state:

EEI does not support this SAR as currently drafted because it inappropriately plans to duplicate within the NERC Glossary of Terms the definitions for Generator Owner and Generator Operator as developed for use in the NERC Rules of Procedure (Appendix 5B; Statement of Compliance Registry Criteria, Revision 8), which is a document used for a different purpose from the definitions used in NERC Reliability Standards. We are also concerned that if these definitions are simply duplicated/mirrored without further clarification, those definitions would require all IBRs, regardless of size, ownership or method of control to be included in the NERC Reliability Standards, if those resources were connected at 60kV or above and aggregate to 20MVA or above on a single feeder. EEI does not agree that this was the intent of this project and therefore does not support this proposed change.

We are also concerned that there is nothing in this SAR that would obligate the DT to conduct an analysis/assessment of the impacts of these proposed changes on the full body of NERC Reliability Standards, which is required whenever a NERC Glossary Terms definition is modified. To address our concerns, we offer the following changes to the proposed SAR (in boldface below):

Purpose or Goal:

The goal of this project is to **revise the NERC Glossary of Terms definitions for Generator Owner and Generator Operator to include generator owners and operators that own and maintain non-BES inverter based generating resources (IBRs) that have an aggregate nameplate capacity of greater than or equal to 20 MVA, are operated together through a common facility-level controller as a single resource and 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.**

Project Scope:

Revise the NERC Glossary of Terms definitions for Generator Owner and Generator Operator to include generator owners and operators that own and maintain non-BES inverter based generating resources (IBRs) that have an aggregate nameplate capacity of greater than or equal to 20 MVA, are operated together through a common facility-level controller as a single resource and 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 and are controlled by a common plant controller and propose an implementation plan for these definitions that is consistent with the November 17, 2022 FERC order.

Detailed Description:

Revise the definitions for Generator Owner and Generator Operator in the NERC Glossary of Terms to include generator owners and operators that own and maintain non-BES inverter based generating resources (IBRs) that have an aggregate nameplate capacity of greater than or equal to 20 MVA, are operated together through a common facility-level controller as a single resource and 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 and are controlled by a common plant controller

This **drafting team (DT)** should also **assess the impact of these changes on all affected NERC Reliability Standards** and develop an implementation plan for **those standards affected**, consistent with FERC's November 17, 2022 IBR Registration order.

Further, FirstEnergy asks for clarification of connections through the Distribution that would fall under the scope of the NERC Glossary of Terms and pending standards to ensure the assigned responsibility be defined for the GO and GOP.

We find situations on the Distribution side has little impact on the Transmission System and by clearly declaring this separation would ease monitoring, operating and reporting from the Distribution System that would otherwise be held for the Transmission System.

Likes 0

Dislikes 0

Response

Thank you for your participation and comments. The drafting team understands these concerns and will be working to address this SAR in conjunction with SAR submitted by TAPS (another SAR) to ensure the definition meets the intent of reliability. The drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

David Jendras Sr - Ameren - Ameren Services - 1,3,6

Answer Yes

Document Name

Comment

Ameren would like more clarity around what NERC is asking for if these changes have already been incorporated into the Rules of Procedure and approved. Additionally, we agree with EEI's and NAGF's comments.

Likes 0

Dislikes 0

Response

Thank you for your participation and comment. The change in the Rules of Procedure modified the definitions of the Generator Owner and Generator Operator entities. This change in definitions under the Rules of Procedure did not modify the definition of Generator Owner or Generator Operator as used in the "Glossary of Terms Used in NERC Reliability Standards". This project will modify the terms used in the "Glossary of Terms Used in NERC Reliability Standards" to include the Class 2 generator entities. The drafting team will be working on industry outreach to promote better understanding of this particular project and the SARs associated.

Please see the drafting team's response to NAGF and EEI comments.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer Yes

Document Name

Comment

Please add the development of a Category 2 GO/GOP Definition Reference Document to this SAR explaining how to apply the Category 2 GO/GOP definition, similar to the BES Definition Reference Document that was developed for the application of the BES Definition.

Please add that FERC approved the revised NERC Rules of Procedure on June 27, 2024, regarding the definitions of GO and GOP.

Please add that a comprehensive assessment of all NERC Reliability Standards applicable to the GO and GOP functions should be done regarding the development of the implementation plan.

Likes 0

Dislikes 0

Response

Thank you for your participation and recommendations.

As detailed in the Enhancing NERC Standard Processes document, recommendation 2c states: “NERC Staff recommends that the Standards Committee, working with NERC Staff, provide guidance to drafting teams on how they should approach the SAR phase for a given project. Drafting teams should describe accurately the scope of the issue, the technical foundation, and, where appropriate, provide illustrative solutions that could be considered. The drafting team, however, should not attempt to limit potential outcomes through prescriptive or limiting language, which could hamper a drafting team’s ability to consider alternate approaches raised by stakeholders during comment periods.” The purpose of the SAR is to document “why” a project is needed rather than “how” project objectives will be achieved or implemented. As such the drafting team will modify the Generator Owner and Generator Operator definitions as described in the SAR and

develop an implementation plan which supports the modifications. The drafting team will take your Definition Reference Document recommendation into consideration, in which the industry may use the document as an additional tool.

The drafting team has added the FERC approved, as listed in your recommendation. The drafting team is working diligently to ensure all impacted applicable standards are identified.

In addition, and as listed within the SAR, the drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer	Yes
Document Name	
Comment	
<i>The NAGF recommends that the "Other" check box be selected and specify "Implementation Plan development" in the SAR Type section to support the implementation plan to be created for the revised Generator Owner/Generator Operator (GO/GOP) definitions.</i>	
Likes 0	
Dislikes 0	

Response

Thank you for your participation and comment. The drafting team has taken your recommendation into consideration and has updated the SAR to include the Implementation Plan.

As a drafting team develops a proposed Reliability Standard, they are required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated Reliability Standard or Standards. The minimum requirements are outlined in the NERC Standard Processes Manual of Appendix 3A Section 4.4.3.

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

Answer	Yes
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Document Name	
Comment	
<p>While EEI does not oppose this SAR, we are concerned that the definitions contained in the NERC Rules of Procedure (Appendix 5B; Statement of Compliance Registry Criteria, Revision 8) do not have sufficient details to ensure consistent and unambiguous application within the NERC Reliability Standards. To address this concern, we recommend, similar to what was done with the Bulk Electric System definition, a companion Definition Reference document be developed for industry review, comment, and approval as a critical component of this project.</p> <p>EEI also recommends that in addition to the development of the implementation plans for the identified Reliability Standards identified in this SAR, the DT should consider doing a comprehensive assessment of all other NERC Reliability Standards that contain applicability for GOs and GOPs to ensure the obligations under those standards are not impacted in ways that might not be intended with the changes to these two definitions.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your participation and recommendations. As detailed in the Enhancing NERC Standard Processes document, recommendation 2c states: “NERC Staff recommends that the Standards Committee, working with NERC Staff, provide guidance to drafting teams on how they should approach the SAR phase for a given project. Drafting teams should describe accurately the scope of the issue, the technical foundation, and, where appropriate, provide illustrative solutions that could be considered. The drafting team, however, should not attempt to limit potential outcomes through prescriptive or limiting language, which could hamper a drafting team’s ability to consider alternate approaches raised by stakeholders during comment periods.” The purpose of the SAR is to document “why” a project is needed rather than “how” project objectives will be achieved or implemented. As such the drafting team will modify the Generator Owner and Generator Operator definitions as described in the SAR and develop an implementation plan which supports the modifications. The drafting team will take your Definition Reference Document recommendation into consideration, in which the industry may use the document as an additional tool.</p> <p>As part of the SAR, the drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.</p>	

Hayden Maples - Evergy - 1,3,5,6 - MRO	
Answer	Yes
Document Name	
Comment	
Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the North American Generator Forum (NAGF) on question 1	
Likes	0
Dislikes	0
Response	
Thank you for your participation. Please see the drafting team's response to NAGF and EEI comments.	
Deborah Currie - Southwest Power Pool Regional Entity - 2 - MRO, Group Name IRC SRC	
Answer	Yes
Document Name	
Comment	
<p>The proposed SAR indicates that the Standard Drafting Team (SDT) should develop an implementation plan or plans for applicable standards consistent with FERC’s November 17, 2022 IBR Registration order and provides a discrete list of standards that the SDT may need to address. The ISO/RTO Council (IRC) Standards Review Committee (SRC) is uncertain whether the SAR is directing the drafting team to develop a single, comprehensive implementation plan that addresses all applicable standards or a series of individual implementation plans, each of which addresses only one of the applicable standards. The SRC recommends that the SAR be revised to clarify which approach the drafting team is required to take, or whether the drafting team has the flexibility to choose either approach.</p> <p>The SRC also believes the SAR should be more definitive about the need for the SDT to develop an implementation plan or plans for applicable standards. Instead of suggesting a set of standards that “may” be applicable, the SAR should positively identify all standards that the SDT should consider for applicability. Any standard that is currently applicable to GOs or GOPs should be considered for applicability – some standards that are conspicuously absent from the list in the SAR include: MOD-026-1, MOD-027-1, PRC-024-3, and PRC-025-2 -</p>	

especially when the SAR section about other standards that should be assessed for impact identifies “none”. The SAR must be clear to ensure all known standards are identified, however through the course of SDT discussions and the comment process, there may be a need for the SDT to address standards not identified at the SAR stage.

Likes 0

Dislikes 0

Response

Thank you for your participation and recommendation. As detailed in the Enhancing NERC Standard Processes document, recommendation 2c states: “NERC Staff recommends that the Standards Committee, working with NERC Staff, provide guidance to drafting teams on how they should approach the SAR phase for a given project. Drafting teams should describe accurately the scope of the issue, the technical foundation, and, where appropriate, provide illustrative solutions that could be considered. The drafting team, however, should not attempt to limit potential outcomes through prescriptive or limiting language, which could hamper a drafting team’s ability to consider alternate approaches raised by stakeholders during comment periods.” The purpose of the SAR is to document “why” a project is needed rather than “how” project objectives will be achieved or implemented. As such the drafting team will modify the Generator Owner and Generator Operator definitions as described in the SAR and develop an implementation plan which supports the modifications. As part of the SAR, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

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

Answer Yes

Document Name

Comment

ERCOT joins the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and adopts them as its own.

Likes 0

Dislikes 0

Response

Thank you for your participation. Please see the drafting team's response to ISO/RTO Council (IRC) Standards Review Committee (SRC).

Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

AZPS supports the following comments that were submitted by EEI on behalf of its members:

While EEI does not oppose this SAR, we are concerned that the definitions contained in the NERC Rules of Procedure (Appendix 5B; Statement of Compliance Registry Criteria, Revision 8) do not have sufficient details to ensure consistent and unambiguous application within the NERC Reliability Standards. To address this concern, we recommend, similar to what was done with the Bulk Electric System definition, a companion Definition Reference document be developed for industry review, comment, and approval as a critical component of this project.

EEI also recommends that in addition to the development of the implementation plans for the identified Reliability Standards identified in this SAR, the DT should consider doing a comprehensive assessment of all other NERC Reliability Standards that contain applicability for GOs and GOPs to ensure the obligations under those standards are not impacted in ways that might not be intended with the changes to these two definitions.

Likes 0

Dislikes 0

Response

Thank you for your participation. Please see the drafting team's response to EEI comments:

As detailed in the Enhancing NERC Standard Processes document, recommendation 2c states: "NERC Staff recommends that the Standards Committee, working with NERC Staff, provide guidance to drafting teams on how they should approach the SAR phase for a given project. Drafting teams should describe accurately the scope of the issue, the technical foundation, and, where appropriate, provide illustrative solutions that could be considered. The drafting team, however, should not attempt to limit potential outcomes through prescriptive or limiting language, which could hamper a drafting team's ability to consider alternate approaches raised by stakeholders during comment periods." The purpose of the SAR is to document "why" a project is needed rather than "how" project objectives will be achieved or implemented. As such the drafting team will modify the Generator Owner and Generator Operator definitions as described in the SAR and

develop an implementation plan which supports the modifications. The drafting team will take your Definition Reference Document recommendation into consideration, in which the industry may use the document as an additional tool.

As part of the SAR, the drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5

Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response

Thank you for your participation and comment.

Brian Van Gheem - Radian Generation - NA - Not Applicable - NA - Not Applicable

Answer	
Document Name	
Comment	

1. We observe that a second Standard Authorization Request (SAR) has been assigned to this project. That second SAR is significantly different. We believe the NERC Standards Committee should receive comments from both requests before directing a Standard Drafting Team (SDT) to proceed. Under this SAR, we understand the SDT was to revise the definitions of Generator Owner and Generator Operator with the language recently adopted under Appendix 2 of the NERC Rules of Procedure. This revision would split the current definitions into two separate categories with Category 1 defining the existing set of registered entities. While this approach does appear less complex than the second SAR:
 - i. We believe the NERC Standards Committee should delay action on this SAR to consult with the Compliance & Certification Committee (CCC). This would allow the CCC an opportunity in providing input on the consolidation of the two SARs and

developing recommendations on specific skill sets that SDT candidates should possess to ensure the Standards Committee has qualified candidates to choose from when selecting the SDT members. Such an opportunity is in alignment with the CCC’s ongoing responsibilities to support the rollout of key ERO Enterprise Compliance Monitoring and Enforcement activities.

- ii. We believe NERC Staff should circulate a list of all NERC and Regional Reliability Standards that have an applicability of Generator Owner and Generator Operator that would be impacted by the change in definitions. We understand a similar list was circulated within the ERO Enterprise in late 2023 but was never formally shared with industry. The formal publication of that list will provide some initial insight.
- iii. We believe this project’s SDT should initially collect informal stakeholder feedback from various technical workshops. These workshops should individually focus on specific Reliability Standard Families, scheduled far enough in advance to gain industry support, and scheduled far enough apart to obtain constructive comments by limited industry resources. A period of two months between workshops should be sufficient to allow adequate participation.

Likes 0

Dislikes 0

Response

Thank you for your participation and recommendations. The drafting team, in conjunction with both the NERC Standards Committee and Compliance & Certification Committee, is working to address both industry SARs. Your suggestion as been considered, but unfortunately is not plausible at this time due to federal constraints. The drafting team understands the confusion in which both SARs may cause, but is prepared to run both paths in parallel, ensuring the outcome of the definitions meet the intent of reliability. The drafting team will be working on industry outreach and further educational engagements to help clarify both SARs and the overall path that must be taken.

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

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC

Answer

Document Name

Comment

WECC suggests the DT consider excluding BAL-001-TRE-2 and delegate the change to Texas RE. The changes to the other Standards should not be delayed or inhibited because of possible additional efforts at the Regional level. There is the possibility that Texas RE participants may not agree to the same language or be on the same approval schedule based on the Regional Standards Development Process. As the Standard is a Regional Standard, Texas RE should handle the efforts and collaboration with NERC be handled accordingly.

SAR should also address other issues within the list of Standards. Case in point, consider adjustments to PRC-005-6 as PRC-017-1 will be retired March 31, 2027 per the PRC-005-2(i) and PRC-005-6 Implementation Plan. If the SAR team decides to make the change to applicability in PRC-017-1 it appears to be effort that will need to be spent again on PRC-005-6. Additionally, there are changes needed in PRC-017-1 that were not addressed during the development of the “new” RAS definition. Particularly, R2 references a “Regional Reliability Organization”, fails to utilize approved template language in the latter parts (e.g., “D: Compliance”), fails to identify Data Retention levels, and does not reflect VSL/VRF correctly. It would be more effective use of the teams time to address PRC-005-6.

The WECC Variance in VAR-001-5 is more than a simple applicability change. The approved definition of Generator Operator is:

“Generator Operator” means the entity that: 1) operates generating Facility(ies) and performs the functions of supplying energy and Interconnected Operations Services (Category 1 GOP); or 2) operates non-BES inverter based generating resources that either have or contribute to an aggregate 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 (Category 2 GOP).”

The WECC Variance completely changes Requirement R4 and R5 of the nationwide Standard and provides new language (Requirement R4 is deleted and R5 language was replaced). In E.A.13 the phrasing requires significant change as it currently states “Each.....to the Generator Operators for each of their generation resources that are on-line and part of the Bull Electric System within the Transmission Operator Area...” Significant issues to consider- Category 2 GOP operates “non-BES inverter based resources” which means for inclusion of Category 2

GOP in the WECC Interconnection for VAR-001-5 requires E.A. 13 changes in language. Additionally, the definition and use of Transmission Operator Area does not support non-BES inverter based generating resources. TOP Area definition is: “The collection of Transmission assets over which the Transmission Operator is responsible for operating. “ The definition of “Transmission” (used within TOP Area definition) is “An interconnected group of lines and associated equipment for the movement or transfer of electric energy between points of supply and points at which it is transformed for delivery to customers or is delivered to other electrical systems.” A TO may not have “lines and associated equipment” at the locations specified in the Transmission definition for the TOP to be responsible for operating.

WECC Variance E.A.14 language brings its own set of issues (e.g., What is considered the “point of interconnection”?) that will likely require language changes.

E.A.17 applicability for non-BES inverter-based generating resources would need researched to ensure the capability exists and would likely require language changes.

WECC will initiate a SAR to update the WECC Variance in VAR-001-5 and upon completion submit the proposed revisions to NERC for BOT approval and subsequent FERC filing.

For VAR-002-4.1 there is a footnote (Footnote 5) in Requirement R5 that would need revised that could impact language within the Requirement.

In short, WECC supports the approach to consistency and applicability but there are additional issues (in terms of applicability) that may need addressed in Requirement language to actually make GO/GOP Category 2 entities responsible for the actions within some of the Standards listed. It is understood that this is a definition change and is not specifically addressing Standards changes as a result of the definition change, but the indication of applicability needs some more review regarding some of the Standards noted above.

Likes	0
Dislikes	0

Response

Thank you for your participation and recommendation. As part of the SAR, the drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

Brian Van Gheem - Radian Generation - NA - Not Applicable - NA - Not Applicable

Answer	
Document Name	
Comment	
1. Thank you for the opportunity to comment.	
Likes 0	
Dislikes 0	
Response	
The drafting team appreciates your participation and comments.	
Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for your participation.	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	
Document Name	
Comment	

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Thank you for your participation and comment.

Deborah Currie - Southwest Power Pool Regional Entity - 2 - MRO, Group Name IRC SRC

Answer

Document Name

Comment

The implementation plan or plans developed by the SDT will lay out when each applicable Reliability Standard will become enforceable for the GO/GOP Category 2 entities. When the implementation plan or plans are posted so that the GO/GOP Category 2 entities will know when they are subject to compliance, the SRC notes that the entities responsible for modeling the Category 2 assets will also need to be informed of the implementation dates and provided with contact information for Category 2 entities.

Finally, the SRC notes that the project scope is very brief and only includes a task of matching the GO/GOP definition in the NERC Glossary of Terms with the Rules of Procedure. The detailed description goes on to identify a need to develop an implementation plan or plans that will impact many Reliability Standards. The need to develop an implementation plan or plans that will impact multiple standards is a significant part of this project and should be identified within the project scope.

Likes 0

Dislikes 0

Response

The DT team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer	
Document Name	
Comment	
<p><i>NAGF membership provides the following items for consideration: Consider the example of GO/GOP facilities connected at 69kV that are not connected to BES transmission and as such, the transmission facility could be owned by a non-registered entity. If this is the case, it is not clear who their PC, TO, TOP or TP would be. NAGF members have seen instances where TPs tell registered BES generators that they are not their TP and the Regional Entity tells the GO that they are. NERC will need to assist new entry GO/GOP facilities to resolve such issues.</i></p> <p><i>Under VAR-001, the TOP must provide a voltage schedule to the GOP and then VAR-002 requires the GOP to maintain that schedule or notify the TOP. It is not clear if the voltage schedule must come from a registered TOP or if the voltage schedule is expected to come from the non-registered owner of the 69kV line. If the owner of the 69 kV line is not a registered TOP, is the expectation that a registered TOP will provide a schedule that supersedes the 69kV line's owners schedule?</i></p> <p><i>For the Standards listed in the SAR, the above issues will cause registration and enforcement problems with the VAR Standards, MOD-032 and TOP-003. These issues must be addressed prior to or in parallel with GO/GOP definition changes.</i></p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your participation and recommendation. As part of the SAR, the drafting team will complete the proposed definition. In addition, the drafting team will review the listed standards within the SAR and take both direct and indirect impacts into consideration when composing the Implementation Plan.</p>	
Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	

Document Name	
Comment	
BPA recognizes the need for changes regarding the IBR. BPA has no comments at this time but does support the need to define IBR characteristics.	
Likes	0
Dislikes	0
Response	
Thank you for your participation and comment.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter	
Answer	
Document Name	
Comment	
Terms already finalized without industry input and now is at mercy of FERC already approving. The process of assigning a project and posting a SAR for items and actions that NERC has already been initiated into their Registration seems out of step. FirstEnergy questions if this is going to be the normal mode of operation and request future integrations include the opportunity for industry input.	
Likes	0
Dislikes	0
Response	
Thank you for your participation and comment. While your concern is understood it falls outside the process of the drafting team.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	

Comment

Texas RE supports the objective of the SAR to align the NERC Glossary of Terms definitions of Generator Owner and Generator Operator with the revised definitions contained in the Rules of Procedure registry criteria for Generator Owner and Generator Operator.

Likes 0

Dislikes 0

Response

Thank you for your participation and comment.

Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments

Answer

Document Name

Comment

Black Hills Corporation agrees with the additional comments provided by NAGF.

Likes 0

Dislikes 0

Response

Thank you for your participation and comment.

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

Answer

Document Name

Comment

Duke Energy agrees with and recommends implementation of NAGF comments.	
Likes	0
Dislikes	0
Response	
Thank you for your participation and comment.	
Alison MacKellar - Constellation - 5,6	
Answer	
Document Name	
Comment	
Constellation feels the line should be drawn on what is subject to NERC standards as many small behind the meter IBR facilities would not be economical to run if subjected to NERC tests and modeling requirements.	
Alison Mackellar on behalf of Constellation Segments 5 and 6	
Likes	0
Dislikes	0
Response	
Thank you for your participation and comment. While your concern is understood it falls out of the realm of this SAR. This concern would be better addressed within the scope of the following milestone 3 projects: Project 2020-06 – Verifications of Models and Data for Generators Project 2021-01 – System Model Validation with IBRs Project 2022-02 – Uniform Framework Model Framework for IBR	
Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5	
Answer	

Document Name	
Comment	
Definitions should align exactly with one another.	
Likes 0	
Dislikes 0	
Response	
Thank you for your participation and comment.	
Chantal Mazza - Hydro-Quebec (HQ) - 1 - NPCC	
Answer	
Document Name	
Comment	
Please change the sentence “these ROP changes are pending before FERC” to reflect FERC approval of the ROP changes on June 27th in docket RR24-2-000.	
Please change “a definition of Inverter Based Resources is being developed” to has been developed and recently approved in project 2020-06.	
Likes 0	
Dislikes 0	
Response	
The drafting team agrees with the comment and moving forward we will be using the approved definitions as needed.	
Kimberly Turco - Constellation - 5,6	
Answer	

Document Name	
Comment	
<p>Constellation feels the line should be drawn on what is subject to NERC standards as many small behind the meter IBR facilities would not be economical to run if subjected to NERC tests and modeling requirements.</p> <p>Kimberly Turco on behalf of Constellation Segments 5 and 6</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your participation and comment. While your concern is understood it falls out of the realm of this SAR. This concern would be better addressed within the scope of the following milestone 3 projects:</p> <p>Project 2020-06 – Verifications of Models and Data for Generators Project 2021-01 – System Model Validation with IBRs Project 2022-02 – Uniform Framework Model Framework for IBR</p>	
Marty Hostler - Northern California Power Agency - 3,4,5,6	
Answer	
Document Name	
Comment	
None	
Likes	0
Dislikes	0
Response	



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 mcllja@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"/> Variance development or revision	<input type="checkbox"/> Other (Please specify)
<input type="checkbox"/> Revision to Existing Standard			
<input checked="" type="checkbox"/> Add, Modify or Retire a Glossary Term			
<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"/> Enhanced Periodic Review Initiated	<input checked="" type="checkbox"/> Industry Stakeholder Identified
<input type="checkbox"/> Emerging Risk (Reliability Issues Steering Committee) Identified			
<input type="checkbox"/> Reliability Standard Development Plan			
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 the 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 and the new defined term for Sub-BES IBRs can be developed on an expedited

Requested information

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

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facilities to 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 implementation plan appropriate 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.

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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),

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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.

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<p>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.</p>
<p>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>
<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.
<p>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:</p>
<p>Glossary terms will directly affect GOs and GOPs, and will affect the compliance responsibilities of TOs and DPs.</p>
<p>Do you know of any consensus building activities⁵ in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.</p>
<p>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.</p>
<p>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)?</p>
<p>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.</p>

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.

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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
<i>e.g.</i> , 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

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 mcllja@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"/> Variance development or revision	<input type="checkbox"/> Other (Please specify)
<input type="checkbox"/> Revision to Existing Standard			
<input checked="" type="checkbox"/> Add, Modify or Retire a Glossary Term			
<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"/> Enhanced Periodic Review Initiated	<input checked="" type="checkbox"/> Industry Stakeholder Identified
<input type="checkbox"/> Emerging Risk (Reliability Issues Steering Committee) Identified			
<input type="checkbox"/> Reliability Standard Development Plan			
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			

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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.

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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 the 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 and the new defined term for Sub-BES IBRs can be developed on an expedited

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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

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facilities to 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 implementation plan appropriate 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 justification ⁴ 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):
<ol style="list-style-type: none"> 1. The deliverables <i>must</i> 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 <i>must</i> 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 <i>should</i> 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. <i>If necessary</i>, the deliverables <i>must</i> 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. <p>Technical foundation documents include (or will include):</p> <ol style="list-style-type: none"> 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) <p>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 <i>should</i> apply to Category 2 GO/GOPs and Sub-BES IBRs.</p>
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.

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<p>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.</p>
<p>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>
<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.
<p>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:</p>
<p>Glossary terms will directly affect GOs and GOPs, and will affect the compliance responsibilities of TOs and DPs.</p>
<p>Do you know of any consensus building activities⁵ in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.</p>
<p>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.</p>
<p>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)?</p>
<p>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.</p>

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

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

Unofficial Comment Form

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

Do not use this form for submitting comments. Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments on an additional Standard Authorization Request (SAR) for **Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator); SAR IBR Registration and Standards Applicability Glossary Update** by 8 p.m. Eastern, Monday, September 16, 2024.

Additional information is available on the [project page](#). If you have questions, contact Senior Standards Developer, [Jessica Harris](#) (via email) or at 404-710-4885.

Background Information

The project will address concerns regarding the reliability impacts of inverter-based resources (IBRs) on the Bulk-Power System that do not meet the current definition of Bulk Electric System (BES) and have not historically been required to be registered with NERC for compliance with the NERC Reliability Standards. Such concerns are discussed in detail in the Federal Energy Regulatory Commission (FERC) November 17, 2022 order in [Docket No. RD22-4-000](#), in which FERC directed NERC to develop a work plan to address the registration of these IBRs and ensure their compliance with Reliability Standards by certain milestone dates. See Registration of Inverter-Based Resources, 181 FERC ¶ 61,124 (Nov. 17, 2022).

This additional SAR concerns an additional definition to be considered for those IBRs that fall below the BES criteria and meet the new registration classification. This SAR also concerns additional definitions for “non-material IBR” and “IBR-DER” as referenced within FERC Order No. 901.¹

In March 2024, NERC proposed changes to its Rules of Procedure registry criteria to include certain non-BES IBRs in the Generator Owner (GOs) and Generator Operator (GOP) categories. Revising the GO and GOP definitions in the NERC Glossary of Terms to match the registry criteria will ensure these previously unregistered IBRs will be subject to the NERC Reliability Standards and mitigate their impacts on the BPS. On June 27, 2024 FERC approved the proposed revisions to the NERC Rules of Procedure.² Per the ruling:

Pursuant to section 215(f) of the FPA, we approve NERC’s proposed revisions to its Rules of Procedure as just, reasonable, not unduly discriminatory or preferential, and in the public interest because these revisions should ensure that unregistered IBRs will become subject to Reliability Standards currently applicable to generator owners and operators in May 2026 and then become subject to additional Reliability Standards following the implementation of projects developed in accordance with Order No. 901.³

¹ <https://www.ferc.gov/media/e-1-rm22-12-000>

² <https://www.ferc.gov/media/e-6-rr24-2-000>

³ Ibid at P 1.

This project will continue to be apprised of updates to the NERC IBR Registration Initiative⁴ to ensure reasonable effective dates are implemented and consistent with the NERC Registration Rollout strategy for Category 2 Generator Owners and Generator Operators.

⁴ https://www.nerc.com/pa/Documents/IBR_Quick%20Reference%20Guide.pdf

Questions

1. Do you agree with the proposed project scope to create a new definition for Sub-BES IBRs? Please provide any additional information to support your response.

Yes
 No

Comments:

2. Do you agree with the proposed project scope to include in a new definition for Sub-BES IBRs or within a new or revised Standard to provide for “ex ante certainty” regarding which IBR facilities are considered to be Sub-BES IBRs? Please provide any additional information to support your response.

Yes
 No

Comments:

3. Do you agree with the proposed project scope to create a new definition for Non-Material IBRs and IBR-DERs? Please provide any additional information to support your response.

Yes
 No

Comments:

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

Comments:

UPDATED

Standards Announcement

Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) Standard Authorization Request - IBR

Formal Comment Period Open through September 16, 2024

[Now Available](#)

Additional questions have been added to the comment form to encompass thorough feedback from industry. Original comments will be preserved and reviewed by the assigned drafting team members. The closing date for the updated comment form has been updated to September 16, 2024.

A formal comment period for the **Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) Standard Authorization Request (SAR) - IBR**, is open through **8 p.m. Eastern, Monday, September 16, 2024**.

Commenting

Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments. An unofficial Word version of the comment form is posted on the [project page](#).

- *Contact NERC IT support directly at <https://support.nerc.net/> (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.*
- *Passwords expire every **6 months** and must be reset.*
- *The SBS **is not** supported for use on mobile devices.*
- *Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.*

Next Steps

The drafting team will review all responses received during the comment period and determine the next steps of the project.

For information on the Standards Development Process, refer to the [Standard Processes Manual](#).

For more information or assistance, contact Senior Standards Developer, [Jessica Harris](#) (via email) or at 404-710-4885. [Subscribe to this project's observer mailing list](#) by selecting "NERC Email Distribution Lists" from the "Service" drop-down menu and specify "Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)" in the Description Box.



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Standards Announcement

Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) Standard Authorization Request - IBR

Formal Comment Period Open through September 11, 2024

[Now Available](#)

A formal comment period for the **Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) Standard Authorization Request (SAR) - IBR**, is open through **8 p.m. Eastern, Wednesday, September 11, 2024**.

Commenting

Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments. An unofficial Word version of the comment form is posted on the [project page](#).

- Contact NERC IT support directly at <https://support.nerc.net/> (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.
- Passwords expire every **6 months** and must be reset.
- The SBS **is not** supported for use on mobile devices.
- Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.

Next Steps

The drafting team will review all responses received during the comment period and determine the next steps of the project.

For information on the Standards Development Process, refer to the [Standard Processes Manual](#).

For more information or assistance, contact Senior Standards Developer, [Jessica Harris](#) (via email) or at 404-710-4885. [Subscribe to this project's observer mailing list](#) by selecting "NERC Email Distribution Lists" from the "Service" drop-down menu and specify "Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)" in the Description Box.



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Comment Report

Project Name: 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) - Standard Authorization Request - IBR

Comment Period Start Date: 8/16/2024

Comment Period End Date: 9/16/2024

Associated Ballots:

There were 29 sets of responses, including comments from approximately 104 different people from approximately 77 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree with the proposed project scope to create a new definition for Sub-BES IBRs? Please provide any additional information to support your response.
2. Do you agree with the proposed project scope to include in a new definition for Sub-BES IBRs or within a new or revised Standard to provide for “ex ante certainty” regarding which IBR facilities are considered to be Sub-BES IBRs? Please provide any additional information to support your response.
3. Do you agree with the proposed project scope to create a new definition for Non-Material IBRs and IBR-DERs? Please provide any additional information to support your response.
4. 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
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
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Jaimin Patal	Saskatchewan Power Corporation (SPC)	1	MRO
					George Brown	Pattern Operators LP	5	MRO
					Larry Heckert	Alliant Energy (ALTE)	4	MRO
					Terry Harbour	MidAmerican Energy Company (MEC)	1,3	MRO
					Dane Rogers	Oklahoma Gas and Electric (OG&E)	1,3,5,6	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
					Andrew Coffelt	Board of Public Utilities-Kansas (BPU)	1,3,5,6	MRO
Peter Brown	Invenergy	5,6	MRO					

					Angela Wheat	Southwestern Power Administration	1	MRO
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Joshua Phillips	Southwest Power Pool	2	MRO
					Patrick Tuttle	Oklahoma Municipal Power Authority	4,5	MRO
Southwest Power Pool, Inc. (RTO)	Deborah Currie	2	MRO,WECC	IRC SRC	Charles Yeung	Southwest Power Pool	1	MRO
					Ali Miremadi	CAISO	1	WECC
					Helen Lainis	IESO	1	NPCC
					Matt Goldberg	ISO-NE	1	NPCC
					Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Elizabeth Davis	PJM	1	RF
					Kennedy Meier	Electric Reliability Council of Texas, Inc.	2	Texas RE
FirstEnergy - FirstEnergy Corporation	Mark Garza	1,3,4,5,6		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
DTE Energy - Detroit Edison Company	Mohamad Elhusseini	3,5		DTE Energy	Mohamad Elhusseini	DTE Energy	5	RF
					Patricia Ireland	DTE Energy	4	RF

					Marvin Johnson	DTE Energy - Detroit Edison Company	3	RF
Black Hills Corporation	Rachel Schuldt	1,3,5,6		Black Hills Corporation - All Segments	Micah Runner	Black Hills Corporation	1	WECC
					Josh Combs	Black Hills Corporation	3	WECC
					Rachel Schuldt	Black Hills Corporation	6	WECC
					Carly Miller	Black Hills Corporation	5	WECC
					Sheila Suurmeier	Black Hills Corporation	5	WECC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	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
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Sean Bodkin	Dominion - Dominion	6	NPCC

				Resources, Inc.			
				David Kwan	Ontario Power Generation	4	NPCC
				Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
				Sean Cavote	PSEG	4	NPCC
				Jason Chandler	Con Edison	5	NPCC
				Tracy MacNicoll	Utility Services	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
				Jeffrey Streifling	NB Power Corporation	1,4,10	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
				Chantal Mazza	Hydro Quebec	1	NPCC
				Nicolas Turcotte	Hydro Quebec	2	NPCC
				Steve Rueckert	WECC	10	WECC

Western Electricity Coordinating Council	Steven Rueckert			WECC Entity Monitoring	Curtis Crews	WECC	10	WECC
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1. Do you agree with the proposed project scope to create a new definition for Sub-BES IBRs? Please provide any additional information to support your response.

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

Answer Yes

Document Name

Comment

Yes, this term should be defined by combining the now FERC approved registration threshold in the ROP revisions and the IBR definition approved by the ballot body.

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

When it is stated SUB BES IBR, does that mean IBRs below 20 MW and connected at 60 KV or more? Or is it still using 100 KV connection as the definition of BES?

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer Yes

Document Name

Comment

Yes, although I would not call them "Sub-BES IBRs" as this could encompass both BPS connected IBRs and Distribution connected IBRs. I would recommend aligning the term to the new registrations and call them Category 2 IBRs, or Cat2 IBRs.

Likes 0

Dislikes 0

Response

Rebecca Baldwin - Transmission Access Policy Study Group - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

Yes. A definition of Sub-BES IBRs is needed to facilitate the development of Milestone 3 and 4 standards in compliance with Order 901, and for future IBR-related standards efforts. FERC has directed that non-BES IBR facilities that meet the new Category 2 registration criteria be subject to certain standards as laid out in Order 901. Drafting teams will thus need to be able to refer to this class of facilities in a way that is both clear and consistent. Clarity regarding what facilities are included in proposed standards/requirements is necessary so that stakeholders can comment effectively on drafts, and so that registered entities and regulators can be confident that the final standard is fair and enforceable and will achieve its reliability goals.

Some of the delay in the development of the Milestone 2 standards is attributable to (a) those projects' dependence on a definition of "Inverter-Based Resource" that was under development at the same time as the Milestone 2 projects, as well as (b) the lack of a defined term for non-BES IBR facilities that meet the Category 2 registration criteria, which led to inconsistencies in referring to those facilities across projects. While two of the Milestone 2 standards have been approved by the ballot pool, PRC-029 has not, and is the subject of the NERC Board's first exercise of Rule 321. In addition, despite attempts at coordination among the Milestone 2 drafting teams, the three standards' applicability sections are inconsistent; PRC-030 has been posted for an additional ballot to, among other things, remedy that inconsistency. This SAR will help to prevent a repeat of the Milestone 2 experience by proactively developing defined terms so that drafting teams working on Milestone 3 and 4 projects will have the appropriate tools at hand when they need them, allowing those SDTs to avoid unnecessary delays and to produce better standards that are clearer and more protective of reliability.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer Yes

Document Name

Comment

The NAGF supports the creation of a new definition for Sub-BES IBRs.

Likes 0

Dislikes 0

Response

Bill Zuretti - Electric Power Supply Association - 5

Answer	Yes
Document Name	
Comment	
A definition of Sub-BES IBRs will enable a better focused standards development process and provide needed clarity in the development of Milestone 3 and 4 standards in compliance with Order 901, and for future IBR-related standards efforts. Clarity regarding what facilities are included in proposed standards/requirements is necessary so that stakeholders can understand their obligations and compliance capabilities, allowing them to comment effectively on drafts, leading to a final standard that is clear and enforceable.	
Likes 0	
Dislikes 0	
Response	
Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
SPP has collaborated with SRC on developing comments for this SAR. SPP agrees with SRC comments.	
Likes 0	
Dislikes 0	
Response	
Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3,5 - WECC	
Answer	Yes
Document Name	
Comment	
While other projects are defining what this SUB-BES definition is, it needs to be approved and balloted like othe NERC glossary of term definitions. A definition of Sub-BES IBRs is needed to facilitate the development of Milestone 3 and 4 standards in compliance with Order 901, and for future IBR-related standards efforts	
Likes 0	
Dislikes 0	
Response	

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer

Document Name

Comment

Yes, agree.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer

Document Name

Comment

Constellation agrees with NAGF comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

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

Answer

nO

Document Name

Comment

Duke Energy agrees with and recommends implementation of EEI comments.

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer

nO

Document Name

Comment

Use the “Non-BES Inverter-Based Resource” definition proposed for PRC-030-1. Simply add that to the Glossary and there should not be any real resistance as PRC-030-1 has passed. Creating a new definition may invalidate the efforts for PRC-030-1 (as well as others that may consider the use).

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6

Answer

nO

Document Name

Comment

AZPS supports the following comments submitted by EEI on behalf of its members:

EEI does not support defining in the Glossary of Terms facilities that fall outside of NERC Reliability Standards. However, we also believe that all of the concerns express in this SAR can be readily and effectively address through the development of a companion Technical Reference document similar to what was developed for the BES definition to provide additional clarity. And why we support some of the concerns expressed in this SAR, we do not support or believe there is a compelling need for this overly prescriptive approach as proposed.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5,6

Answer

nO

Document Name

Comment

AEP believes that the Category 2 for GOs and GOPs is explicitly clear as currently specified in the NERC ROP, and requests that this proposed SAR be withdrawn from consideration and not pursued in any way.

Notwithstanding the above response, if the primary intent is to determine which standards fall into a Category 2 classification, then we recommend a different approach be taken from what is suggested in the SAR. AEP sees value in clarifying the assets that the SAR refers to as Sub-BES DERs, but we do not believe that establishing a glossary definition for Sub-BES DERs is the best way to achieve this clarity. We also do not agree with pursuing glossary definitions for Non-Material DERs and IBR-DERs which are clearly out of scope. We believe a preferable approach would instead be for the establishment of new Functional Entities such as GO Category 1, GO Category 2, GOP Category 1, and GOP Category 2, the categories for which are provided in the two new definitions for GO and GOP. These two categorizations are provided within the new ROP definitions for GO and GOP, but if an entity cannot register as a Category 1 or 2, and thus cannot be added as a Functional Entity within a standard’s Applicability, then that specificity cannot be extended to the standards themselves. While we acknowledge that this would take time for them to be added to the ROP, for entities to register for

them as necessary, and for all the necessary standards to be revised, we believe the final results would be far superior to that of simply pursuing glossary definitions of the categorized assets. In addition, we believe establishing new Functional Entities for these categories would also allow improvements to be made for Category 1, as the current definitions in the ROP do not explicitly limit the category to the BES, unlike Category 2 which is clearly non-BES in nature.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer

nO

Document Name

Comment

FirstEnergy requests clarification on how the DT will address 3rd party owned devices to ensure they follow these proposed updates.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments

Answer

nO

Document Name

Comment

Black Hills Corporation agrees that Applicable Facilities need to be clearly identified for each NERC Standard. However, it is unclear if this project is duplicating work already being performed within the NERC SAR that intends to align the ROP definitions for Category 2 GO and GOP with the NERC Glossary of Terms for Reliability Standards. If not, then defining the non-BES IBRs which will be required to register (Category 2 GO/GOP IBRs) and subject to compliance with NERC Standards is necessary. Black Hills Corporation also supports EEI comments regarding creation of a Technical Reference document.

Likes 0

Dislikes 0

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name IRC SRC

Answer

nO

Document Name	
Comment	
<p>The ISO/RTO Council's (IRC) Standard Review Committee (SRC) believes that the SAR should be revised to give the SDT the flexibility to determine whether to develop additional defined terms instead of requiring the SDT to develop certain terms. The SRC agrees that the SDT may find it appropriate to develop definitions for Sub-BES IBRs as identified in FERC Order 901 in the course of its work developing an implementation plan(s) for the Reliability Standards impacted by the Category 2 GO/GOP Rules of Procedure change. However, the SRC believes that the SDT might instead determine that the Category 2 definition is sufficient, and no further definitions are necessary. Consequently, the SRC recommends that the SAR be revised to give the SDT this flexibility.</p>	
Likes 0	
Dislikes 0	
Response	
Hayden Maples - Evergy - 1,3,5,6 - MRO	
Answer	nO
Document Name	
Comment	
<p>Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) on question 1</p>	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	nO
Document Name	
Comment	
<p>Minnesota Power supports EEI's comments.</p>	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	

Answer	nO
Document Name	
Comment	
<p>EI does not support defining in the Glossary of Terms facilities that fall outside of NERC Reliability Standards. However, the concerns expressed in this SAR can be addressed through the development of a companion Technical Reference document similar to what was developed for the BES definition to provide additional clarity. And while we support some of the concerns expressed in this SAR, we do not support or believe there is a compelling need for this overly prescriptive approach as proposed.</p>	
Likes 0	
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	nO
Document Name	
Comment	
<p>ERCOT joins the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and adopts them as its own.</p>	
Likes 0	
Dislikes 0	
Response	

2. Do you agree with the proposed project scope to include in a new definition for Sub-BES IBRs or within a new or revised Standard to provide for “ex ante certainty” regarding which IBR facilities are considered to be Sub-BES IBRs? Please provide any additional information to support your response.

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

Answer No

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

EI does not support the proposal to develop new definitions for Sub-BES IBRs because this issue is already being addressed within the NERC SAR that intends to align the ROP definitions for GO and GOP with the NERC Glossary of Terms for Reliability Standards. We further note that IBR is defined by the Project 2020-06 DT. However, we are supportive of a companion Technical Reference document similar to what was developed for the BES definition.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer No

Document Name

Comment

Part 1 seems to be a path by which responsibility for identifying which IBRs (non-BES, at least) with material impact to the BPS could be shifted back onto the Regional Entities. A lot of commenters asked for similar method to PRC-029 regarding evaluation of what IBRs should require monitoring, but

this text doesn't seem to indicate in any way that facilities meeting the registration threshold would ever be excluded. I would absolutely oppose the method proposed in item 2. No one needs that, and it runs contrary to providing certainty.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer

No

Document Name

Comment

Minnesota Power supports EEI's comments.

Likes 0

Dislikes 0

Response

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC

Answer

No

Document Name

Comment

SPP has collaborated with SRC on developing comments for this SAR. SPP agrees with SRC comments

Likes 0

Dislikes 0

Response

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer

No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) and the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 2

Likes 0

Dislikes 0

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name IRC SRC

Answer

No

Document Name

Comment

The SRC does not disagree with the principle of providing ex ante certainty for Category 2 IBRs, but believes that in this case this certainty is more appropriately provided through the ERO Enterprise (such as through the registration and certification process and the associated provisions in the NERC Rules of Procedure) rather than through the standards drafting process. Consequently, we recommend that the Section beginning with "In developing a definition of Sub-BES IBRs..." on Page 4 of the SAR be removed in its entirety.

Should this section remain within the SAR, the SRC recommends referencing Appendix 5C of NERC's Rules of Procedure, which contains the process for BES Exception determinations, instead of referencing FERC Order 773-A P110.

Likes 0

Dislikes 0

Response

Israel Perez - Salt River Project - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

The SAR seeks to Define "Sub-BES IBR" It seems like defining "Non-BES IBRs" would make more sense and allow standards to have a clear alignment to the FERC order, rather than establishing a different term in "SUB-BES IBR". Provide more detail and clarity on applicable terminology.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments

Answer

No

Document Name

Comment

Black Hills Corporation agrees with comments provided by both EEI and NAGF.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer

No

Document Name

Comment

FirstEnergy requests clarifying the intent of forecasting methods - if this is to include IBR or would IBR be removed, and a forecasting method could be used.

FirstEnergy inquires if the DT would need to consider FERC Order 1920 FERC Order for inclusion in the SAR.

Regarding Aggregation – FirstEnergy requests the need for this to be addressed and clarified as far as what information would be required, who would be responsible and how this would be shared and used.

FirstEnergy finds the devices modifying the load today could become an economic action as this moves forward and questions if NERC is the applicable body to govern this.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5,6

Answer

No

Document Name

Comment

As stated in our response to Question #1, we agree in part with the reliability need as stated in the SAR but do not believe that new glossary definitions for the assets themselves is the best approach for achieving this clarity.

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>Part 1 seems to be a path by which responsibility for identifying which IBRs (non-BES, at least) with material impact to the BPS could be shifted back onto the Regional Entities. A lot of commenters asked for similar method to PRC-029 regarding evaluation of what IBRs should require monitoring, but this text doesn't seem to indicate in any way that facilities meeting the registration threshold would ever be excluded. I would absolutely oppose the method proposed in item 2. No one needs that, and it runs contrary to providing certainty.</p> <p>Relevant text from the SAR:</p> <p>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.</p> <p>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.")</p> <p>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.</p> <p>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.</p> <p>2. Alternatively, a Reliability Standard approach could be modeled on the CIP-002 approach to BES Cyber System categorization.</p>	
Likes	0
Dislikes	0
Response	
Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6	
Answer	No
Document Name	
Comment	
<p>AZPS supports the following comments submitted by EEI on behalf of its members:</p>	

EEl does not support the proposal to develop new definitions for Sub-BES IBRs because this issue is already being addressed within the NERC SAR that intends to align the ROP definitions for GO and GOP with the NERC Glossary of Terms for Reliability Standards. We further note that IBR was already defined by the Project 2020-06 DT. However, we are supportive of a companion Technical Reference document similar to what was developed for the BES definition

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer

No

Document Name

Comment

Use the "Non-BES Inverter-Based Resource" definition proposed for PRC-030-1. Simply add that to the Glossary and there should not be any real resistance as PRC-030-1 has passed. Creating a new definition may invalidate the efforts for PRC-030-1 (as well as others that may consider the use).

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Duke Energy agrees with and recommends implementation of EEl comments.

Likes 0

Dislikes 0

Response

Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3,5 - WECC

Answer

Yes

Document Name

Comment

Yes. Registered entities and compliance monitoring staff should know from the outset which generation facilities are subject to which standards. This issue is too fundamental, and implicates too many standards, to leave to auditor discretion, potentially subjecting registered entities to extensive noncompliance findings if an auditor interprets the applicable definition differently from the registered entity

Likes 0

Dislikes 0

Response

Bill Zuretti - Electric Power Supply Association - 5

Answer

Yes

Document Name

Comment

It is critical that registered entities and regulators have clarity about which standards will apply to certain generation facilities. Having a clearly defined and more comprehensive set of definitions will allow for a more effective and efficient compliance process for registered entities and auditors/regulators.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Yes

Document Name

Comment

The NAGF provides the following items for consideration: The use of "ex ante certainty" in the SAR document is problematic and requires clarification or removal. This terminology introduces unnecessary complexity and may lead to confusion among industry participants. Identifying facilities that fall under the new sub-BES IBR definition is crucial. However, the proposed approaches raise concerns:

- 1. Regional entity definitions may lead to inconsistencies across different areas.*
- 2. A self-assessment process similar to CIP-002 could be challenging for entities unfamiliar with NERC standards. This approach may result in incomplete or inaccurate identifications, potentially compromising the effectiveness of the new definition.*

NERC should consider alternative methods for facility identification that are clear, consistent, and accessible to all relevant entities, regardless of their familiarity with NERC standards. This may include developing a standardized assessment tool or providing detailed guidance documents to assist entities in determining their status under the new definition. Additionally, NERC must address the potential impact on existing standards and processes before implementing these changes to ensure a smooth transition and avoid unintended consequences.

Likes 0

Dislikes 0

Response	
Rebecca Baldwin - Transmission Access Policy Study Group - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
<p>Yes. Registered entities and compliance monitoring staff should know from the outset which generation facilities are subject to which standards. This issue is too fundamental, and implicates too many standards, to leave to auditor discretion, potentially subjecting registered entities to extensive noncompliance findings if an auditor interprets the applicable definition differently from the registered entity.</p> <p>In addition, where an IBR facility does <i>not</i> meet the new registration thresholds, that facility's host TO or DP will be responsible (pursuant to Order 901 and Milestone 3 standards) for providing data and models of the IBR to grid planners and operators. It is thus vital that the GO/GOP, interconnecting TO/DP, and Regional Entity have a shared understanding regarding the status of each IBR. In the absence of that understanding, IBR data may either be double-counted (reported by both the owner and the host TO/DP) or fall through the cracks (reported by neither entity), undermining the ability to achieve the reliability goal set by FERC.</p>	
Likes	0
Dislikes	0
Response	
Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	
<p>Yes, I think a new definition is appropriate should be called out in the Reliability Standard when appropriate to determine if the Reliability Standard applies to both BES and Sub-BES IBRs.</p>	
Likes	0
Dislikes	0
Response	
Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC	
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

Kimberly Turco - Constellation - 5,6

Answer

Document Name

Comment

Constellation agrees with NAGF comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer

Document Name

Comment

Yes, agree.

Likes 0

Dislikes 0

Response

3. Do you agree with the proposed project scope to create a new definition for Non-Material IBRs and IBR-DERs? Please provide any additional information to support your response.

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

Answer No

Document Name

Comment

Duke Energy agrees with and recommends implementation of EEI comments.

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer No

Document Name

Comment

It would be beneficial to consider IBR-DER definition but not necessarily a "Non-Material IBR" definition. By default, those IBRs not meeting the Non-BES Inverter-Based Resource definition (proposed PRC-030-1) and a new IBR-DER definition are non-material. Defining a new definition will be a struggle as application of the definition will likely dominate conversations. If this SAR moves forward, focus on defining the term to capture the reliability impacts. Suggest getting data about IBR-DER levels (individual and overall aggregate in a defined area (BA perhaps)) currently implemented to help determine a value threshold if needed.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6

Answer No

Document Name

Comment

AZPS supports the following comments submitted by EEI on behalf of its members:

EEl does not support the proposal to define non-material IBRs and IBR-DERs. However, we are supportive of a companion Technical Reference document similar to what was developed for the BES definition

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5,6

Answer

No

Document Name

Comment

As stated in our response to Question #1, we disagree with creating NERC glossary definitions for Non-Material IBRs and IBR-DERs, as we see no purpose in creating formal terms for assets that are out of scope.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer

No

Document Name

Comment

FirstEnergy does not support the proposal to define non-material IBRs and IBR-DERs given these facilities fall outside of NERC authority and their owners have no obligations under the NERC Reliability Standards. Moreover, there is no confusion over the term DER or which BPS IBRs must register.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Black Hills Corporation - 1,3,5,6, Group Name Black Hills Corporation - All Segments

Answer

No

Document Name

Comment

Black Hills Corporation agrees with the comments provided by both EEI and NAGF. Black Hills Corporation does not believe NERC should be defining generating units/facilities which fall outside of NERC registration criteria and are not Applicable Facilities within the NERC Standards.

Likes 0

Dislikes 0

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name IRC SRC

Answer

No

Document Name

Comment

See Response to Question 1.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer

No

Document Name

Comment

Minnesota Power supports EEI's comments.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

EEl does not support the proposal to define non-material IBRs and IBR-DERs. However, we are supportive of a companion Technical Reference document similar to what was developed for the BES definition.

Likes 0

Dislikes 0

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

Answer

No

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

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

Answer

Yes

Document Name

Comment

Yes, while respecting the IBR definition that has now been approved by the ballot body.

Likes 0

Dislikes 0

Response**Israel Perez - Salt River Project - 1,3,5,6 - WECC**

Answer

Yes

Document Name

Comment

When developing definitions, provide granular explanations, applicability, provide general examples of each category.

Likes 0

Dislikes 0

Response

Rebecca Baldwin - Transmission Access Policy Study Group - NA - Not Applicable - NA - Not Applicable

Answer

Yes

Document Name

Comment

Yes. Order 901's directives apply differently with respect to (1) BES IBR facilities and Sub-BES IBRs (as defined in the SAR); (2) IBR facilities that fall below the revised registration thresholds but are connected to the Bulk Power System (which the SAR refers to as "Non-Material IBRs"); and (3) IBR facilities that are connected to the distribution system (which the SAR mirrors Order 901 in calling "IBR-DERs"). To avoid unnecessary delays, defined terms for all three classes of non-BES IBRs should be developed on an expedited timeframe so that drafting teams working on Milestone 3 and 4 standards can refer to the appropriate classes of IBR facilities clearly and consistently.

It is important to provide some means of ex ante certainty regarding which IBRs fall into each category of facilities. As noted in response to question 2, the categorization of an IBR determines which registered entity—GO/GOP or TO/DP—is responsible for providing data and models of the IBR to grid planners and operators. It is thus vital that a facility's owner/operator, the utility to which it is interconnected, and the Regional Entity be on the same page regarding the status of each IBR.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Yes

Document Name

Comment

The NAGF provides the following items for consideration: The proposed definitions for non-material IBRs and IBR DERs are necessary and warranted. However, incorporating these definitions into the current project scope raises concerns about potential delays and unintended consequences.

- 1. Project timeline: Including these additional definitions may impede the primary objective of aligning glossary terms with Category 2 GO/GOP definitions, which is time-sensitive and critical.*
- 2. Scope expansion: The original intent of this project was to address Category 2 GO/GOP definitions. Broadening the scope to include non-material IBRs and IBR DERs introduces complexity that may not be fully addressed within the current project framework.*
- 3. Separate initiative: NERC should consider developing definitions for non-material IBRs and IBR DERs as a standalone Phase 2 project. This approach would allow for a more focused and thorough examination of these concepts without compromising the timely completion of the primary project goals.*

NERC must carefully weigh the benefits of including these additional definitions against the potential risks of project delays and reduced effectiveness in addressing the core Category 2 GO/GOP alignment issue

Likes 0

Dislikes 0

Response

Bill Zuretti - Electric Power Supply Association - 5

Answer

Yes

Document Name

Comment

IBR facilities that fall below the revised registration thresholds but are connected to the Bulk Power System (referred to in the SAR as “Non-Material IBRs”) and IBR facilities that are connected to the distribution system (which the SAR refers to as “IBR-DERs”) are subject to Order 901’s directives in ways that are different and distinct from each other. As such, it is appropriate and necessary that these facilities have a clear, specific definition.

Likes 0

Dislikes 0

Response

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer

Yes

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 3

Likes 0

Dislikes 0

Response

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC

Answer

Yes

Document Name

Comment

SPP has collaborated with SRC on developing comments for this SAR. SPP agrees with SRC comments

Likes 0

Dislikes 0

Response

Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3,5 - WECC

Answer

Yes

Document Name

Comment

Yes. Order 901's directives apply differently with respect to (1) BES IBR facilities and Sub-BES IBRs (as defined in the SAR); (2) IBR facilities that fall below the revised registration thresholds but are connected to the Bulk *Power* System (which the SAR refers to as "Non-Material IBRs"); and (3) IBR facilities that are connected to the distribution system (which the SAR mirrors Order 901 in calling "IBR-DERs"). To avoid unnecessary delays, defined terms for all three classes of non-BES IBRs should be developed on an expedited timeframe so that drafting teams working on Milestone 3 and 4 standards can refer to the appropriate classes of IBR facilities clearly and consistently.

It is important to provide some means of ex ante certainty regarding which IBRs fall into each category of facilities. As noted in response to question 2, the categorization of an IBR determines which registered entity—GO/GOP or TO/DP—is responsible for providing data and models of the IBR to grid planners and operators. It is thus vital that a facility's owner/operator, the utility to which it is interconnected, and the Regional Entity be on the same page regarding the status of each IBR.

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

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	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO	
Answer	
Document Name	
Comment	
Yes, agree.	
Likes 0	

Dislikes 0

Response

Kimberly Turco - Constellation - 5,6

Answer

Document Name

Comment

Constellation agrees with NAGF comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

4Provide any additional comments for the drafting team to consider, if desired.

Kimberly Turco - Constellation - 5,6

Answer

Document Name

Comment

Constellation agrees with NAGF comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6.

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1,3,5,6

Answer

Document Name

Comment

Manitoba Hydro would like to submit the following comment for consideration on the SAR issued between 07/02/24 - 8/20/24 for this project. *Question 1. With revisions to Generator Owner and Generator Operator definitions, as proposed in the SAR to align with the June 27 FERC approval change of the registration criteria to the NERC Rules of Procedure, is there any other information that the team should consider when making these revisions?* - MH response: Yes, the SAR lists the standards that may be applicable following a definition change. Should this list be expanded to include all those with Generator Owner (and Generator Operator) as applicable entities, such as PRC-023-6, PRC-025-2, PRC-026-2, PRC-027-1, PRC-005-6, FAC-001-4, FAC-002-4, and FAC-008-5, and etc.?

Likes 0

Dislikes 0

Response

Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Document Name

Comment

BPA agrees If FERC (via Order 901) will be requiring the modeling of IBR below the current BES threshold (20 MW individual, 75 MW aggregate) then coming up with clear definitions will be important.

BPA has a few questions:

1. Is there a new threshold for IBR where it is not required to be modeled? For example, does FERC envision the modeling of 1 MW IBRs? How about 500 kW IBRs? Therefore, along with the new definitions there needs to be an establishment of a new lower IBR modeling threshold.
2. For IBR-DER, does the GO/GOP terms apply?
3. Is it typical for a single GO to own a DER? If not, then maybe the IBR-DER is only applicable to the DP?

Finally, BPA feels there needs to be a threshold for when the GO/GOP has to register due to their "Sub-BES IBR". For example, should the GO/GOP have to register if they have a 10 MW Sub-BES IBR? How about a 5 MW or a 2 MW? At some threshold the GO/GOP should not have to register due to the Sub-BES IBR because it is too small and is now considered a Non-Material IBR."

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.

Likes 0

Dislikes 0

Response

Scott Thompson - PNM Resources - Public Service Company of New Mexico - 1,3,5 - WECC

Answer

Document Name

Comment

Given that there is no longer time for terms developed by this project to be incorporated into the Milestone 2 projects, there is no longer a need to take a phased approach. Instead, all three defined terms should be developed on an expedited basis so that they are available for use by the Milestone 3 drafting teams.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Document Name

Comment

OPG supports NPCC Regional Standards Committee's comments and supports the SAR.

Likes 0

Dislikes 0

Response

Mia Wilson - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC

Answer

Document Name

Comment

SPP has collaborated with SRC on developing comments for this SAR. SPP agrees with SRC comments

Likes 0

Dislikes 0

Response

Hayden Maples - Evergy - 1,3,5,6 - MRO

Answer

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Midwest Reliability Organization's NERC Standards Review Forum (MRO NSRF) on question 3

Likes 0

Dislikes 0

Response

Junji Yamaguchi - Hydro-Quebec (HQ) - 1,5

Answer

Document Name

Comment

Approve this SAR

Likes 0

Dislikes 0

Response

Chantal Mazza - Hydro-Quebec (HQ) - 1 - NPCC

Answer

Document Name

Comment

HQ has no comments and supports the SAR.

Likes 0

Dislikes 0

Response

Bill Zuretti - Electric Power Supply Association - 5

Answer

Document Name

Comment

While the definitions contained in the SAR will not be developed in time to be incorporated into Milestone 2 efforts, it is important that this SAR move forward on an expedited basis so that Milestones 3 and 4 can proceed with a more clearly defined and granular set of definitions. This will aid the standards drafting teams, allow the standards development process to move forward on better defined standards, and should also assist in moving the standard through the notice and comment proceeding before FERC. Absent specific definitions as proposed in this SAR, there is a risk that the proposed standard's imprecision hampers the NERC approval process and raises concerns over applicability and compliance among those who need to comply in order to maintain a reliable system

Likes 0

Dislikes 0

Response

Deborah Currie - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name IRC SRC

Answer

Document Name

Comment

This SAR appears to overlap with the other SAR that has been assigned to this project. To reduce the potential for confusion, the SRC recommends that the two SARs be combined into a single SAR before work begins under either SAR. The SRC also supports the two phases proposed within the SAR.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Document Name

Comment

The NAGF has no additional comments.

Likes 0

Dislikes 0

Response

Rebecca Baldwin - Transmission Access Policy Study Group - NA - Not Applicable - NA - Not Applicable

Answer

Document Name

Comment

Given that there is no longer time for terms developed by this project to be incorporated into the Milestone 2 projects, there is no longer a need to take a phased approach. Instead, all three defined terms should be developed on an expedited basis so that they are available for use by the Milestone 3 drafting teams.

We do not anticipate that the majority of the work proposed in the SAR will prove controversial, given that the general parameters of the three categories to be defined are established by Order 901, and that FERC has already approved the thresholds for Sub-BES IBRs in its order accepting

NERC's revisions to the Statement of Compliance Registry Criteria. However, in order to define "Non-Material" (BPS-connected) IBRs and "IBR-DERs," the SDT will need to determine a reasonable proxy for the boundary between the BPS and the distribution system. Because the definition of the Bulk Power System—a statutory term that is relevant to the limits of FERC's and NERC's reliability jurisdiction—is significantly less granular than the NERC-developed definition of the Bulk *Electric* System, it may be challenging to draw this boundary. As with the remainder of the work proposed in this SAR, however, defining the boundary between Non-Material IBRs and IBR-DERs cannot be avoided: if the Project 2024-01 SDT were to refrain from doing so, the Milestone 3 SDTs would instead need to set a boundary on a piecemeal basis, because data and models of IBR-DERs may be provided "in the aggregate," whereas data and models of Non-Material IBRs may not be aggregated. The SDT may be able to minimize the potential for controversy by (1) using the same 60 kV boundary as the Category 2 GO/GOP and Sub-BES IBR definitions, because FERC has accepted that boundary as satisfying its 2022 directive to "register owners and operators of IBRs *that are connected to the Bulk-Power System*" (*Registration of Inverter-Based Resources*, 181 FERC ¶ 61,124 P 1 (2022) (emphasis added)), and (2) indicating clearly that the 60 kV threshold is merely a proxy for the lower limit of the BPS, and that FERC is the ultimate authority regarding the BPS/local distribution boundary. See *N. Am. Elec. Reliability Corp.*, Order Approving Revisions to North American Electric Reliability Corporation Rules of Procedure and Requiring Compliance Filing, 187 FERC ¶ 61,196 P 54 & n.127 (2024).

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer

Document Name

Comment

NPCC RSC supports the Project.

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 3,5, Group Name DTE Energy

Answer

Document Name

Comment

BPS connected IBRs that will fall under the Category 2 GO/GOP registrations should be called Category 2 IBRs (CAT2-IBR) to align with the registrations. This would make it very clear that these are the IBRs that relate to the Category 2 GO/GOP registrations.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6, Group Name FE Voter

Answer

Document Name

Comment

In addition, FirstEnergy finds this process of inserting sub-transmission IBRs into the Reliability Standards needs to be more transparent and geared toward the adopted practice of definition and standard development. The objective of the previously adopted standards may potentially expand beyond their original intent of providing protection toward the grid.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 1,3,5,6

Answer

Document Name

Comment

AZPS has no additional comments at this time.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

[2024-01_Unofficial_Comment_Form IBR SAR_updated_081524.docx](#)

Comment

SAR Scope includes updating GO and GOP Glossary terms. From SAR:

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 implementation plan appropriate 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.

Also of note:

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.

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer

Document Name

Comment

No other comments.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer

Document Name

Comment

The rationale behind the selection of the standards listed under “Standards Affected” by this project is not clear. This SAR scope is to update the Glossary definitions of GO and GOP, add owners and operators for Sub-BES IBRs, and then develop Glossary definitions for Non-Material IBRs and IBR-DERs. Therefore, should this list be expanded to include all NERC standards applicable to Generator Owner (and Generator Operator)?

Likes 0

Dislikes 0

Response

Consideration of Comments

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

Comments Received Summary

There were 29 sets of responses, including comments from approximately 104 different people from approximately 77 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, contact Manager of Standards Information, [Nasheema Santos](#) (via email) or at (404) 290-6796.

Consideration of Comments

The Project 2024-01 Drafting Team (DT) would like to thank all of industry for their time and comments. Due to the similar nature of multiple comments received during the comment period, the DT has chosen to respond to comments in summary format as provided for by section 4.2 of the Standard Processes Manual.

New Defined Terms

The DT received multiple comments specific to the industry need to define multiple terms to adequately identify various Distributed Energy Resources (DER).

Comments specific to Generator Owner and Generator Operator definitions have been addressed by the work completed by the Project 2024-01 DT by revising the Generator Owner and Generator Operator defined terms per the scope of the Generator Owner and Generator Operator Definition Alignment SAR.

The DT recommends the NERC Standards Committee reject the IBR Registration and Standards Applicability Glossary Update SAR, given the duplicative nature of the work already under consideration in Project 2022-02 Uniform Modeling Framework for IBR and Project 2020-06 Verifications of Models and Data for Generators DTs to address additional defined terms for DERs.

The IBR Registration and Standards Applicability Glossary Update SAR proposed the development or expansion of definitions as outlined below:

- **Sub-BES IBR Definition:** Develop a clear definition for Sub-BES IBRs (non-BES IBRs that meet registry criteria thresholds), ensuring there's certainty around which IBR facilities qualify. This could involve updates to the Glossary, Reliability Standards, or NERC's Rules of Procedure.

- **GO/GOP Definitions:** Revise the Glossary definitions for Generator Owners (GOs) and Generator Operators (GOPs) to include Sub-BES IBRs, ensuring no unintended expansion of standards applicability. A detailed implementation plan will be proposed to address any impact on existing standards.
- **Non-Material IBR and IBR-DER Definitions:** Develop definitions for Non-Material IBRs (BPS-connected IBRs not meeting the criteria) and IBR-DERs (distribution-connected IBRs), clarifying their applicability in standards. The goal is to ensure clarity on the classification of each type of IBR.

The proposed term Sub-BES IBR, the DT believes, is addressed with the terminology used in the revised GO and GOP definitions, specifically the Category 2 GO and Category 2 GOP. These definitions clarify that IBRs that meet the Category 2 registration criteria are what the SAR proposed to be defined by the Sub-BES IBR definition. In addition, Projects 2020-06 and 2022-02 are both looking to define DER resources for the purpose of NERC Standards. For these reasons, the 2024-01 DT believes the desired outcome of the IBR Registration and Standards Applicability Glossary Update SAR is already being completed by these other DTs and any efforts by this team would be duplicative of those teams.

The proposed Sub-BES IBR definition for Category 2 IBRs was not created by the DTs associated with Milestone 2 projects of order 901 standards due to the Applicability section of the PRC-028-1, PRC-029-1, and PRC-030-1 standards to specify what generation are applicable to the standards requirements. This approach to identifying the applicable generation for each standard is clear, consistent, and enforceable.

The development of any new or revised standards that will address *aggregated non-registered IBR* by the GO, the *aggregated IBR-DER* by the TO, are associated with Milestone 3 of 901 and are within the scope of project 2022-02 Uniform Modeling Framework for IBR DT. A definition of DER is currently being proposed in Project 2022-02 consistent with section 5.0 of the Standard Processes Manual.

Milestone 3 projects will address the scope of issues related to the current state of model quality. Industry is encouraged to engage with these active DTs to ensure the approach taken regarding identification of these generation types is clear, consistent, and enforceable.

- [Project 2020-06 Verifications of Models and Data for Generators](#)
- [Project 2021-01 – System Model Validation with IBRs](#)
- [Project 2022-02 – Uniform Framework Model Framework for IBR](#)

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:	Generator Owner and Generator Operator Definition Alignment		
Date Submitted:	April 25, 2024 (Revised on November 19, 2024)		
SAR Requester			
Name:	Alison Oswald (Revised by Project 2024-01 DT)		
Organization:	NERC		
Telephone:	404-275-9410	Email:	alison.oswald@nerc.net
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 checked="" type="checkbox"/>	Emerging Risk (Reliability Issues Steering Committee) Identified	<input type="checkbox"/>	Enhanced Periodic Review Initiated
<input type="checkbox"/>	Reliability Standard Development Plan	<input 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?):			
<p>The project will address concerns regarding the reliability impacts of inverter-based resources (IBRs) on the Bulk-Power System that do not meet the current definition of Bulk Electric System (BES) and have not historically been required to be registered with NERC for compliance with the NERC Reliability Standards. Such concerns are discussed in detail in the Federal Energy Regulatory Commission (FERC) November 17, 2022 order in Docket No. RD22-4-000, in which FERC directed NERC to develop a work plan to address the registration of these IBRs and ensure their compliance with Reliability Standards by certain milestone dates. <i>See Registration of Inverter-Based Resources</i>, 181 FERC ¶ 61,124 (Nov. 17, 2022).</p> <p>In March 2024, NERC proposed changes to its Rules of Procedure registry criteria to include certain non-BES IBRs in the Generator Owner (GOs) and Generator Operator (GOP) categories. Revising the GO and GOP definitions in the NERC Glossary of Terms to match the registry criteria will ensure these previously</p>			

Requested information
unregistered IBRs will be subject to the NERC Reliability Standards and mitigate their impacts on the BPS.
Purpose or Goal (What are the reliability gap(s) or risk(s) to the BES being addressed, and how does this proposed project provide the reliability-related benefit described above?):
The goal of this project is to match the NERC Glossary of Terms definitions of Generator Owner and Generator Operator with the revised definitions contained in the Rules of Procedure registry criteria for Generator Owner and Generator Operator.
Project Scope (Define the parameters of the proposed project):
Match the NERC Glossary of Terms with the definitions contained in the Rules of Procedure for Generator Owner and Generator Operator and propose an implementation plan for these definitions that is consistent with the November 17, 2022 FERC order.
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 justification ¹ 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):
<p>The definitions of Generator Owner and Generator Operator in the NERC Rules of Procedure were revised in March 2024 to address the FERC directives from the November 17, 2022 order and NERC’s work plan for implementing that order. These revisions were filed with FERC March 19, 2024; NERC requested expedited action by June 2024.</p> <p>The NERC Glossary of Terms shall be revised to align with the definitions that FERC approved in the NERC Rules of Procedure registry criteria on June 27, 2024. This team shall also develop an implementation plan for the revised GO/GOP definitions. The Reliability Standards that will not require any revisions and will be subject to enforcement to registrants meeting the Category 2 criteria are:</p> <ul style="list-style-type: none"> ▪BAL-001-TRE-2 ² ▪IRO-010-5 ▪MOD-032-1 ▪PRC-012-2 ▪PRC-017-1 ▪TOP-003-6.1 ▪VAR-001-5 ▪VAR-002-4.1 <p>Other standards applicability and enforceability will be established through existing standards development processes.</p>
Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):

¹ 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.

² The Drafting team should collaborate with NERC and Regional Entity staff in the review and implementation of this standard.

Requested information	
	The cost impact is unknown at this time. Updating the GO/GOP definitions in conjunction with the NERC Registry Criteria will ensure that new entities are registered as GOs or GOPs and must be compliant with NERC Reliability Standards.
	Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):
	This project will impact current non-BES IBRs with aggregate nameplate capacity greater than or equal to 20 MVA connected at a voltage greater than or equal to 60kv.
	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:
	Generator Owner, Generator Operator will be the primary affected entities. However, other entities have responsibilities with respect to GOs/GOPs under the above-listed standards (e.g. Reliability Coordinator, Balancing Authority, Transmission Operator, Transmission Planner, Planning Coordinator, Resource Planner, Transmission Service Provider).
	Do you know of any consensus building activities ³ in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.
	The Rules of Procedure changes including the new GO/GOP registry criteria definitions went through a formal comment process where input was solicited from industry before the final revisions. Additional information can be found here .
	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)?
	None
	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.
	None. The Glossary definitions of Generator Owner/Generator Operator must match those in the Rules of Procedure registry criteria to avoid conflict and confusion.

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 checked="" 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 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.

³ 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.

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
n/a	n/a

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 checked="" 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

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:	Generator Owner and Generator Operator Definition Alignment		
Date Submitted:	April 25, 2024 <u>(Revised on November 19, 2024)</u>		
SAR Requester			
Name:	Alison Oswald <u>(Revised by Project 2024-01 DT)</u>		
Organization:	NERC		
Telephone:	404-275-9410	Email:	alison.oswald@nerc.net
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 checked="" type="checkbox"/>	Emerging Risk (Reliability Issues Steering Committee) Identified	<input type="checkbox"/>	Enhanced Periodic Review Initiated
<input type="checkbox"/>	Reliability Standard Development Plan	<input 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?):			
<p>The project will address concerns regarding the reliability impacts of inverter-based resources (IBRs) on the Bulk-Power System that do not meet the current definition of Bulk Electric System (BES) and have not historically been required to be registered with NERC for compliance with the NERC Reliability Standards. Such concerns are discussed in detail in the Federal Energy Regulatory Commission (FERC) November 17, 2022 order in Docket No. RD22-4-000, in which FERC directed NERC to develop a work plan to address the registration of these IBRs and ensure their compliance with Reliability Standards by certain milestone dates. <i>See Registration of Inverter-Based Resources</i>, 181 FERC ¶ 61,124 (Nov. 17, 2022).</p> <p>In March 2024, NERC proposed changes to its Rules of Procedure registry criteria to include certain non-BES IBRs in the Generator Owner (GOs) and Generator Operator (GOP) categories. Revising the GO and GOP definitions in the NERC Glossary of Terms to match the registry criteria will ensure these previously</p>			

Requested information
unregistered IBRs will be subject to the NERC Reliability Standards and mitigate their impacts on the BPS.
Purpose or Goal (What are the reliability gap(s) or risk(s) to the BES being addressed, and how does this proposed project provide the reliability-related benefit described above?):
The goal of this project is to match the NERC Glossary of Terms definitions of Generator Owner and Generator Operator with the revised definitions contained in the Rules of Procedure registry criteria for Generator Owner and Generator Operator.
Project Scope (Define the parameters of the proposed project):
Match the NERC Glossary of Terms with the definitions contained in the Rules of Procedure for Generator Owner and Generator Operator and propose an implementation plan for these definitions that is consistent with the November 17, 2022 FERC order.
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 justification ¹ 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):
<p>The definitions of Generator Owner and Generator Operator in the NERC Rules of Procedure were revised in March 2024 to address the FERC directives from the November 17, 2022 order and NERC’s work plan for implementing that order. These revisions were filed with FERC March 19, 2024; NERC requested expedited action by June 2024.</p> <p>The NERC Glossary of Terms should shall be revised to <u>align with</u> match the definitions that FERC approveds in the <u>NERC Rules of Procedure registry criteria on June 27, 2024</u> registry criteria. This team should also all also develop an implementation plan for <u>applicable standards consistent with FERC’s November 17, 2022 IBR Registration order. Standards that the revised GO/GOP definitions. The Reliability Standards that will not require any revisions and will be subject to enforcement to registrants meeting the Category 2 criteria are:</u> may be applicable following a definition change include the following:</p> <ul style="list-style-type: none"> ▪BAL-001-TRE-2 ² ▪IRO-010-5 ▪MOD-032-1 ▪PRC-012-2 ▪PRC-017-1 ▪TOP-003-6.1 ▪VAR-001-5 ▪VAR-002-4.1

¹ 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.

² The Drafting team should collaborate with NERC and Regional Entity staff in the review and implementation of this standard.

Requested information	
<u>Other standards applicability and enforceability will be established through existing standards development processes.</u>	
Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):	
The cost impact is unknown at this time. Updating the GO/GOP definitions in conjunction with the NERC Registry Criteria will ensure that new entities are registered as GOs or GOPs and must be compliant with NERC Reliability Standards.	
Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):	
This project will impact current non-BES IBRs with aggregate nameplate capacity greater than or equal to 20 MVA connected at a voltage greater than or equal to 60kv.	
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:	
Generator Owner, Generator Operator will be the primary affected entities. However, other entities have responsibilities with respect to GOs/GOPs under the above-listed standards (e.g. Reliability Coordinator, Balancing Authority, Transmission Operator, Transmission Planner, Planning Coordinator, Resource Planner, Transmission Service Provider).	
Do you know of any consensus building activities ³ in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.	
The Rules of Procedure changes including the new GO/GOP registry criteria definitions went through a formal comment process where input was solicited from industry before the final revisions. Additional information can be found here .	
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)?	
None	
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.	
None. The Glossary definitions of Generator Owner/Generator Operator must match those in the Rules of Procedure registry criteria to avoid conflict and confusion.	

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 checked="" 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.

³ 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.

Reliability Principles	
<input 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.
<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
n/a	n/a

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 checked="" 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		

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Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard is adopted by the NERC Board of Trustees (Board).

Description of Current Draft

This is the initial draft of the proposed definitions for a formal 45-day comment period with an initial ballot.

Completed Actions	Date
Standards Committee approved Standards Authorization Request (SAR)	June 12, 2024
SAR posted for comment	July 2 – August 20, 2024

Anticipated Actions	Date
45-day formal comment period with initial ballot	March 19, 2025
Board adoption	August 2025

Modified Term(s) Used in NERC Reliability Standards

This section includes the modified terms that will be included in the NERC Glossary of Terms to be used in NERC Reliability Standards upon applicable regulatory approval. The terms proposed below are intended to be used in NERC Reliability Standards applicable to Category 2 Generator Owners and Generator Operators.

Terms:

Generator Owner (GO): The entity that: 1) owns and maintains generating Facility(ies) (Category 1 GO); or 2) owns and maintains non-BES Inverter-Based Resource(s) that either have or contribute to an aggregate 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 (Category 2 GO).

Generator Operator (GOP): The entity that: 1) operates generating Facility(ies) and performs the functions of supplying energy and Interconnected Operations Services (Category 1 GOP); or 2) operates non-BES Inverter-Based Resources(s) that either have or contribute to an aggregate 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 (Category 2 GOP).

Version History

Version	Date	Action	Change Tracking
1	TBD	Modified Generator Owner Definition Modified Generator Operator Definition	

Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard is adopted by the NERC Board of Trustees (Board).

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This is the initial draft of the proposed definitions for a formal 45-day comment period with an initial ballot.

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Version History

Version	Date	Action	Change Tracking
1	TBD	Modified Generator Owner Definition Modified Generator Operator Definition	

Implementation Plan

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

Proposed Modified Definitions in the NERC Glossary of Terms

This section includes modified definitions for inclusion in the *Glossary of Terms used in NERC Reliability Standards* (“*Glossary*”), as well as current NERC *Glossary* terms proposed for retirement.

Proposed Modified Definition(s):

- Generator Owner (GO)
- Generator Operator (GOP)

Background

Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) was initiated in June 2024 and concerns the reliability impacts of Inverter-Based Resources (IBRs) on the Bulk-Power System (BPS) that do not meet the current definition of Bulk Electric System (BES) and have not historically been required to be registered with NERC for compliance with the NERC Reliability Standards. Such concerns are discussed in detail in the Federal Energy Regulatory Commission (FERC) November 17, 2022 order in Docket No. RD22-4-000, in which FERC directed NERC to develop a work plan to address the registration of these IBRs and ensure their compliance with Reliability Standards by certain milestone dates. See *Registration of IBRs*, 181 FERC ¶ 61,124 (2022).

FERC approved changes to the NERC Rules of Procedure (ROP) registry criteria to include certain non-BES IBRs in the Generator Owner (GO) and Generator Operator (GOP) categories. Revising the GO and GOP definitions in the NERC *Glossary of Terms* to align with the registry criteria will ensure these previously unregistered IBRs will be subject to the NERC Reliability Standards and mitigate their impact on the BPS. See *Order Approving Revisions to NERC ROP and Requiring Compliance Filing*, 187 FERC ¶ 61,196 (2024).

General Considerations

The Project 2024-01 Drafting Team (DT) has proposed modification to the definitions of “Generator Owner” and “Generator Operator” as defined in the NERC *Glossary* to ensure the inclusion of Category 2 criteria as referenced in the NERC ROP, which includes some IBRs connected to the BPS that do not meet the current definition of BES.

Effective Date for the Modified Definitions for NERC Glossary of Terms

Where approval by an applicable governmental authority is required, the modified definitions shall become effective on the first day of the first calendar quarter after the effective date of the applicable governmental authority's order approving the definitions, or as otherwise provided for by the applicable governmental authority.

Where approval by an applicable governmental authority is not required, the modified definitions shall become effective on the first day of the first calendar quarter after the date the definitions are adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

Phased-In Compliance Dates for the Listed Standards

Eight (8) Reliability Standards have been identified through a NERC staff analysis¹ as applicable and enforceable to generation assets that meet the Category 2 criteria without any revisions to those Reliability Standards or requirements.

For those generation assets that meet the Category 2 criteria in the modified definitions, GOs and GOPs shall comply with the below-listed Reliability Standards the later of May 16, 2026, or as otherwise provided for by the applicable governmental authorities in that jurisdiction.

These Reliability Standards are as follows:

- BAL-001-TRE-2
- IRO-010-5
- MOD-032-1
- PRC-012-2
- PRC-017-1
- TOP-003-6.1
- VAR-001-5
- VAR-002-4.1

Reliability Standards that specify they are applicable only to BES Facilities will not be enforceable on Category 2 facilities unless there is a specific Reliability Standards project that revises them to include Category 2 facilities.

Currently approved Reliability Standards PRC-028-1, PRC-030-1, and recently filed NERC Reliability Standard PRC-029-1 is drafted such that, if approved, will be enforceable for Category 2 GOs and GOPs based on the Implementation Plans for those Reliability Standards.

¹ [NERC GO-GOP Analysis Summary.docx](#)

All other Reliability Standards using GO and GOP may become applicable and enforceable to generation assets that meet the Category 2 criteria upon their revision² and in accordance with their respective revised Reliability Standard language and Implementation Plans.

Definitions Proposed for Retirement

The definitions proposed for retirement shall be retired immediately prior to the effective date of the modified GO and GOP definitions in the particular jurisdiction in which these modified definitions become effective.

² [NERC ROP Appendix 3A](#)

Unofficial Comment Form

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

Do not use this form for submitting comments. Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments for **Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)** by **8 p.m. Eastern, Wednesday, May 7, 2025**.

Additional information is available on the [project page](#). If you have questions, contact Senior Standards Developer, [Jessica Harris](#) (via email) or at 404-710-4885.

Background Information

The project will address concerns regarding the reliability impacts of inverter-based resources (IBRs) on the Bulk-Power System that do not meet the current definition of Bulk Electric System (BES) and have not historically been required to be registered with NERC for compliance with the NERC Reliability Standards. Such concerns are discussed in detail in the Federal Energy Regulatory Commission (FERC) November 17, 2022 order in [Docket No. RD22-4-000](#), in which FERC directed NERC to develop a work plan to address the registration of these IBRs and ensure their compliance with Reliability Standards by certain milestone dates. See Registration of Inverter-Based Resources, 181 FERC ¶ 61,124 (November 17, 2022).

In March 2024, NERC proposed changes to its Rules of Procedure registry criteria to include certain non-BES IBRs in the Generator Owner (GOs) and Generator Operator (GOP) categories. Revising the GO and GOP definitions in the NERC Glossary of Terms to match the registry criteria will ensure these previously unregistered IBRs will be subject to the NERC Reliability Standards and mitigate their impacts on the BPS. On June 27, 2024 FERC approved the proposed revisions to the NERC Rules of Procedure.¹ Per the ruling:

Pursuant to section 215(f) of the FPA, we approve NERC's proposed revisions to its Rules of Procedure as just, reasonable, not unduly discriminatory or preferential, and in the public interest because these revisions should ensure that unregistered IBRs will become subject to Reliability Standards currently applicable to generator owners and operators in May 2026 and then become subject to additional Reliability Standards following the implementation of projects developed in accordance with Order No. 901.²

This project will continue to be apprised of updates to the NERC IBR Registration Initiative³ to ensure reasonable effective dates are implemented and consistent with the NERC Registration Rollout strategy for Category 2 Generator Owners and Generator Operators.

¹ <https://www.ferc.gov/media/e-6-rr24-2-000>

² Ibid at P 1.

³ https://www.nerc.com/pa/Documents/IBR_Quick%20Reference%20Guide.pdf

Questions

1. Do you agree that the proposed modified definitions of Generator Owner and Generator Operator within the NERC Glossary of Terms align with the FERC approved definitions in the NERC Rules of Procedure registry criteria 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? If you do not agree, or if you agree but have suggestions for improvement, please provide your recommendation, if desired.

Yes

No

Comments:

2. Do you agree that the proposed Implementation Plan for the standards that are enforceable with the modified definitions of Generator Owner and Generator Operator within the NERC Glossary of Terms are consistent with FERC's November 17, 2022 IBR Registration order in Docket No. RR22-4-000? If you do not agree, or if you agree but have suggestions for improvement, please provide your recommendation, if desired.

Yes

No

Comments:

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

Comments:

Standards Announcement

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

Formal Comment Period Open through May 7, 2025

Ballot Pools Forming through April 22, 2025

[Now Available](#)

A 45-day formal comment period for **Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)** is open through **8 p.m. Eastern, Wednesday, May 7, 2025**.

Commenting

Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments. An unofficial Word version of the comment form is posted on the [project page](#).

Reminder Regarding Corporate RBB Memberships

Under the NERC Rules of Procedure, each entity and its affiliates is collectively permitted one voting membership per Registered Ballot Body Segment. Each entity that undergoes a change in corporate structure (such as a merger or acquisition) that results in the entity or affiliated entities having more than the one permitted representative in a particular Segment must withdraw the duplicate membership(s) prior to joining new ballot pools or voting on anything as part of an existing ballot pool. Contact ballotadmin@nerc.net to assist with the removal of any duplicate registrations.

Ballot Pools

Ballot pools are being formed through **8 p.m. Eastern, Tuesday, April 22, 2025**. Registered Ballot Body members can join the ballot pools [here](#).

- Contact NERC IT support directly at <https://support.nerc.net/> (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.
- Passwords expire every **6 months** and must be reset.
- The SBS **is not** supported for use on mobile devices.
- Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.

Next Steps

Initial ballots for the revised definitions of Generator Owner and Generator Operator for inclusion in

the *Glossary of Terms used in NERC Reliability Standards* and the associated Implementation Plan will be conducted **April 28 – May 7, 2025**.

For information on the Standards Development Process, refer to the [Standard Processes Manual](#).

For more information or assistance, contact Senior Standards Developer, [Jessica Harris](#) (via email) or at 404-710-4885. [Subscribe to this project's observer mailing list](#) by selecting "NERC Email Distribution Lists" from the "Service" drop-down menu and specify "Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) observer list" in the Description Box.



North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Comment Report

Project Name: 2024-01 Rules of Procedure Definitions Alignment (GO and GOP) | Draft 1
Comment Period Start Date: 3/24/2025
Comment Period End Date: 5/7/2025
Associated Ballots: 2024-01 Rules of Procedure Definitions Alignment (GO and GOP) | Draft 1 GO and GOP Definitions | Implementation Plan IN 1 OT
2024-01 Rules of Procedure Definitions Alignment (GO and GOP) | Draft 1 GO and GOP Definitions IN 1 DEF

There were 53 sets of responses, including comments from approximately 148 different people from approximately 98 companies representing 8 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree that the proposed modified definitions of Generator Owner and Generator Operator within the NERC Glossary of Terms align with the FERC approved definitions in the NERC Rules of Procedure registry criteria 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? If you do not agree, or if you agree but have suggestions for improvement, please provide your recommendation, if desired.
2. Do you agree that the proposed Implementation Plan for the standards that are enforceable with the modified definitions of Generator Owner and Generator Operator within the NERC Glossary of Terms are consistent with FERC's November 17, 2022 IBR Registration order in Docket No. RR22-4-000? If you do not agree, or if you agree but have suggestions for improvement, please provide your recommendation, if desired.
3. 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
Southwest Power Pool, Inc. (RTO)	Alan Wahlstrom	2	MRO,WECC	SPP	Alan Wahlstrom	SPP	2	MRO
					Alan Wahlstrom	SPP	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
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					George Brown	Pattern Operators LP	5	MRO
					Amy Key	MidAmerican Energy Company (MEC)	1	MRO
					Dane Rogers	Oklahoma Gas and Electric (OG&E)	1,3,5,6	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO

					Michael Ayotte	ITC Holdings	1	MRO
					Peter Brown	Invenergy	5,6	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
WEC Energy Group, Inc.	Christine Kane	3		WEC Energy Group	Christine Kane	WEC Energy Group, Inc.	3	RF
					Michelle Hribar	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
					Candace Morakinyo	WEC Energy Group, Inc.	4	RF
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
					Scott Brame	North Carolina Electric Membership Corporation	3,4,5	SERC
					Nick Fogleman	Prairie Power, Inc.	1,3	SERC
					Jolly Hayden	East Texas Electric Cooperative, Inc.	NA - Not Applicable	Texas RE
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

Southwest Power Pool, Inc. (RTO)	Joshua Phillips	2		ISO/RTO Council Standards Review Committee (SRC)	Joshua Phillips	Southwest Power Pool	2	MRO
					Kennedy Meier	ERCOT	2	Texas RE
					Elizabeth Davis	PJM	2	RF
					Kirsten Foster	MISO	2	MRO
					Ali Miremadi	CAISO	2	WECC
					Greg Campoli	NYISO	2	RF
					Gregory Campoli	New York Independent System Operator	2	NPCC
					John Pearson	ISO New England, Inc.	2	NPCC
					Helen Lanis	IESO	2	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
DTE Energy - Detroit Edison Company	Mohamad Elhusseini	5		DTE Energy	Mohamad Elhusseini	DTE Energy	5	RF
					Patricia Ireland	DTE Energy	4	RF
					Marvin Johnson	DTE Energy - Detroit Edison Company	3	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	3	SERC

						Power Company		
					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 -	1	NPCC

						Florida Power and Light Co.			
						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
Western Electricity Coordinating Council	Steven Rueckert	10		WECC		Steve Rueckert	WECC	10	WECC
						Curtis Crews	WECC	10	WECC
Tim Kelley	Tim Kelley		WECC	SMUD and BANC		Nicole Looney	Sacramento Municipal Utility District	3	WECC

					Charles Norton	Sacramento Municipal Utility District	6	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Nicole Goi	Sacramento Municipal Utility District	5	WECC
					Kevin Smith	Balancing Authority of Northern California	1	WECC

1. Do you agree that the proposed modified definitions of Generator Owner and Generator Operator within the NERC Glossary of Terms align with the FERC approved definitions in the NERC Rules of Procedure registry criteria 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? If you do not agree, or if you agree but have suggestions for improvement, please provide your recommendation, if desired.

Thomas Foltz - AEP - 5

Answer No

Document Name

Comment

AEP requests that a qualifier for generating facilities be added to Item 1 in both definitions to make it clear that these are *BES* generating facilities. As a result, the GO definition would then include "...owns and operates BES generating facility(ies)..." while the GOP definition would similarly include "...operates BES generating facility(ies)...".

Likes 0

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer No

Document Name

Comment

In the proposed definition, the Drafting Team has used the terms "Category 1 GO," "Category 2 GO", "Category 1 GOP", and "Category 2 GOP". These terms are used parenthetically and imply that they are defined terms contained within the defined terms of GO and GOP. We understand that Category 1 and 2 terms have been used somewhat commonly, but they are not separately defined. Other drafting teams continue to struggle using these terms. We suggest that in addition to GO and GOP terms being updated, that the Drafting team add the definition of Category 1 Generating Facilities and Category 2 Generating Facilities to the glossary. In this case the definitions of GO and GOP can be simplified as "The Entity that owns and maintains Category 1 and/or Category 2 generating facilities"; or "The Entity that operates Category 1 and/or Category 2 generating Facility(ies) and performs the functions of supplying energy and Interconnected Operations Services."

The "Category 1 Generating Facilities" would then be defined as "Generating Facilities meeting the inclusions identified under the Bulk Electric System definition". "Category 2 Generating Facilities would be defined as "non-BES Inverter-Based Resource(s) that either have or contribute to an aggregate 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". In this way other Standards Drafting teams can then decide the applicability of their projects based on the use of GO/GOP; or Category 1 or 2 GO/GOPs. This also adds understanding and clarity to the NERC Standards, allows future targeted changes to the definitions, and ensures those who are not familiar with the Category 1 and 2 terminology understand the applicability.

Likes 2 Platte River Power Authority, 3, Kiess Richard; Platte River Power Authority, 1, Archie Marissa

Dislikes 0

Response

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

Answer No

Document Name

Comment

The wording is both confusing and unclear as to what differentiates a category 1 entity from a category 2 entity. The way it is currently worded all category 2 entities would also be in category 1 as well. I assume that was not the intent but if it was, having a 1 and 2 implies those are mutually exclusive. If that's the case then simply having a sub-category only applying to 2s would be more clear. If the intent was to have them be in either category but not both the language should be revised to have a clear differentiation between category 1 entities and category 2 entities.

Likes 0

Dislikes 0

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer No

Document Name

Comment

Reclamation does not own any non-BES IBR resources. However, Reclamation does not agree adding IBR resources that do not meet the BES definition.

Likes 0

Dislikes 0

Response

Ben Hammer - Western Area Power Administration - 1

Answer No

Document Name

Comment

Suggest New terms be created for category 2 GO / GOP. The standards should then be modified to include the new category 2 GO / GOP in the applicability section. This more clearly identifies the applicable standards. The scope of the standard should not be modifiable by changing definitions. Instead the scope should be clearly set, and a modification to the scope should involve a revision to the standard.

Likes 0

Dislikes 0

Response

Alyssia Rhoads - Public Utility District No. 1 of Snohomish County - 1

Answer No

Document Name

Comment

“Connected through a system designed primarily for delivery such capacity to [...] voltage greater than or equal to 60kV”

Language does not provide clarity on what “designed primarily” means. A customer load feeder includes a substation "designed primarily" for feeding customer loads at less than 12kV. A 20MVA IBR integrated at the 12kV level may be capable of delivering 20MVA to the 60kV side of the transformer, but it is not "primarily designed" for such purpose. Thus mitigating loads and reducing its BES contributions to below 20MVA.

Recommendation 1: “[...], connected through a system capable of delivering capacity 20MVA or greater to a common point of connection at a voltage greater than or equal to 60kV.

Recommendation 2: “[...], connected though a system intended for delivering an aggregate capacity minus load of 20MVA or greater to a common point of connection at a voltage greater than or equal to 60kV.

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 6

Answer No

Document Name

Comment

To prevent confusion over the term “primarily” as used within the new proposed definitions, AZPS suggests the Standard Drafting Team add clarifying language within the definition as suggested in quotations below:

Generator Owner (GO): The Entity that: 1) owns and maintains generating Facility(ies) (Category 1 GO); or 2) owns and maintains non-BES Inverter-Based Resource(s) that either have or contribute to an aggregate 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 “with no commercial loads on the same collector bus” (Category 2 GOP).

Generator Operator (GOP): The entity that: 1) operates generating Facility(ies) and performs the functions of supplying energy and Interconnected Operations Services (Category 1 GOP); or 2) operates non-BES Inverter-Based Resource(s) that either have or contribute to an aggregate 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 “with no commercial loads on the same collector bus” (Category 2 GOP).

Likes 0

Dislikes 0

Response

Mason Jones - Mason Jones On Behalf of: Benjamin Hector, Northern California Power Agency, 4, 3, 5, 6; Jeremy Lawson, Northern California Power Agency, 4, 3, 5, 6; Marty Hostler, Northern California Power Agency, 4, 3, 5, 6; Michael Whitney, Northern California Power Agency, 4, 3, 5, 6; - Mason Jones

Answer

No

Document Name

Comment

NO. See Response to Question 3 it needs to include the Industry SAR definitions.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

The MRO NSRF agrees that the proposed modified definitions align with the NERC Rules of Procedure registry criteria however offers an alternate approach. The MRO NSRF suggests that either new terms be created for category 2 GO / GOP or that affected standards be modified to clearly indicate if category 2 GO / GOP are in scope. This more clearly identifies the applicable standards. The scope of the standard should not be modifiable by changing definitions. Instead the scope should be clearly set, and a modification to the scope should involve a revision to the standard.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment	
FirstEnergy has no issues.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Minor Difference: For the ROP definition, the phrase inverter based “generating” resources is used while the proposed definition for GO and GOP use the Inverter-Based Resources phrase approved in February. 2025 by FERC.	
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 that the proposed modified definitions for Generator Owner (GO) and Generator Operator (GOP) align with the FERC approved definitions in the NERC Rules of Procedure. However, greater clarity to industry may be achieved by having separate definitions for GO Category 1, GO Category 2, GOP Category 1 and GOP Category 2.	
Likes 2	Platte River Power Authority, 3, Kiess Richard; Platte River Power Authority, 1, Archie Marissa
Dislikes 0	
Response	
John Pearson - ISO New England, Inc. - 2	
Answer	Yes
Document Name	

Comment

Over time, NERC should plan to lower the 60 kV threshold for applicability. There are numerous generation facilities above 20 MVA that are interconnected below 60 kV and it would improve system reliability to have the NERC Standards apply to those facilities.

Likes 0

Dislikes 0

Response**Kimberly Turco - Constellation - 6**

Answer

Yes

Document Name

Comment

Constellation concurs with NAGF comments. Constellation further states that some of the standards that the category 2 non-BES facilities need to comply with such MOD-32 are also included in Milestone 3 as part of FERC 901. There needs to be coordination between the two projects to avoid confusion and misalignment.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response**Alison MacKellar - Constellation - 5**

Answer

Yes

Document Name

Comment

Constellation concurs with NAGF comments. Constellation further states that some of the standards that the category 2 non-BES facilities need to comply with such MOD-32 are also included in Milestone 3 as part of FERC 901. There needs to be coordination between the two projects to avoid confusion and misalignment.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Scott Thompson - TXNM Energy - 3

Answer Yes

Document Name

Comment

TXNM agrees that the proposed modified definitions for Generator Owner (GO) and Generator Operator (GOP) align with the FERC approved definitions in the NERC Rules of Procedure. However, greater clarity to industry may be achieved by having separate definitions for GO Category 1, GO Category 2, GOP Category 1 and GOP Category 2.

Likes 0

Dislikes 0

Response

Alan Wahlstrom - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP

Answer Yes

Document Name

Comment

SPP has collaborated with ISO/RTO Council Standards Review Committee (SRC) and support their comments

Likes 0

Dislikes 0

Response

Ashley Scheelar - TransAlta Corporation - 5

Answer Yes

Document Name

Comment

TransAlta agrees that the definitions include Category 1 and Category 2 which are not defined anywhere else.

The proposed implementation identifies 8 currently adopted standards which will apply to Cat 2 IBR as of May 2026. TransAlta agrees with many commenters that feel this approach this is risky, and suggest that new revisions of the 8 adopted standards be drafted to explicitly include applicability to non-BES facilities, similar to the applicability of PRC-028/029/030.

Likes 0

Dislikes 0

Response

Colleen Campbell - Proenergy Services - 6 - Texas RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC

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

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; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Bob Cardle - Bob Cardle On Behalf of: Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

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	
Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruchi Shah - AES - AES Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Sing Tay - AES - Indianapolis Power and Light Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Karen Demos - NextEra Energy - Florida Power and Light Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 5, Group Name DTE Energy	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kris Kirkegaard, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC	
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	
Dwanique Spiller - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kera Schwartz - Southern Indiana Gas and Electric Co. - 3,5,6 - 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

Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza

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

Rachel Coyne - Texas Reliability Entity, Inc. - 10

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	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC	
Answer	Yes
Document Name	
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	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

Mike Magruder - Avista - Avista Corporation - 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

James Merlo - NAGF - NA - Not Applicable - NA - Not Applicable

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joshua Phillips - Southwest Power Pool, Inc. (RTO) - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)	
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	
Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 5, 6, 1; Mathew Weber, Salt River Project, 3, 5, 6, 1; Matthew Jaramilla, Salt River Project, 3, 5, 6, 1; Timothy Singh, Salt River Project, 3, 5, 6, 1; - Israel Perez	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

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

Answer

Document Name

Comment

BC Hydro appreciates the opportunity to review and offers the following comments and suggestions.

The proposed Generator Owner (GO) and Generator Operator (GOP) Glossary Term definitions mention “non-BES Inverter-Based Resource that either have or contribute to an aggregate nameplate capacity of greater than or equal to 20 MVA, connected through a system designed to ...”

This can be interpreted to include small islanded systems that are not interconnected to the Bulk Electric/Power System. These systems do not have an impact to BES reliability.

BC Hydro’s understanding is that the intention of the revisions is not intended to extend to non-BES IBR units that are not interconnected to the Bulk Power System.

BC Hydro requests that the drafting team clarifies this and revise the proposed definitions to reflect this understanding as appropriate.

The use of the “non-BES” terminology in the proposed definitions indicate that IBR generating units that do not meet the BES definition by virtue of the Exclusion criteria, such as radial systems (E1) or local networks (E3), are intended to be captured by the revised GO and GOP definitions as long as they are connected to BES. Please confirm whether this understanding is accurate.

Likes 0

Dislikes 0

Response

2. Do you agree that the proposed Implementation Plan for the standards that are enforceable with the modified definitions of Generator Owner and Generator Operator within the NERC Glossary of Terms are consistent with FERC's November 17, 2022 IBR Registration order in Docket No. RR22-4-000? If you do not agree, or if you agree but have suggestions for improvement, please provide your recommendation, if desired.

Mason Jones - Mason Jones On Behalf of: Benjamin Hector, Northern California Power Agency, 4, 3, 5, 6; Jeremy Lawson, Northern California Power Agency, 4, 3, 5, 6; Marty Hostler, Northern California Power Agency, 4, 3, 5, 6; Michael Whitney, Northern California Power Agency, 4, 3, 5, 6; - Mason Jones

Answer No

Document Name

Comment

NO. See Response to Question 3 it needs to include the Industry SAR definitions.

Likes 0

Dislikes 0

Response

Ashley Scheelar - TransAlta Corporation - 5

Answer No

Document Name

Comment

TransAlta Agrees with the comments posed by AES. Particularly the following:

AES agrees with the list of standards that will become effective in May 2026. However, we are concerned that without more details being provided in the Implementation Plan, Category 2 GOs and GOPs may not be able to meet the requirements when the standards become effective. A couple of examples:

1. Under IRO-010 and TOP-003, the data specifications from RC, BA, TOP may cover requirements on EOP-012 data, MOD-025 data and data associated with other standards. Since some of these standards (eg: EOP-012, MOD-025) are not going to be applicable to Category 2 GOs/GOPs beginning in May 2026, what are the expectations for Category 2 GOs/GOPs to comply and fulfill the data specification requirements? Currently, there is no language specified in the Implementation Plan concerning this. If Category 2 GOs/GOPs do not provide data related to EOP-012 or other standards that are not effective yet for Category IBRs, is that considered to be a violation? Another concern is whether the applicable RC/BA/TOP of these Category 2 GOs/GOPs know if they are required to send the data specifications to the Category 2 GOs/GOPs, and do they need to send it prior to the effective date (5/16/2026) and give the new Category 2 entities time to understand and fulfill the data specification requirements. What are the compliance implications if Category 2 GOs and GOPs do not have a copy of the data specifications by the effective date of 5/16/2026 and therefore do not have information to fulfill or provide based on requirements in the data specs?

2. Under VAR-002, Category 2 GOPs are required to follow the voltage schedule provided by its TOP. Typically, TOPs (per VAR-001) are required to send voltage schedules to their GOPs. However, it is not clear in the Implementation Plan on whether TOPs are required to notify the Category 2 GOPs of voltage schedules prior to the effective date (5/16/2026). What are the compliance implications if Category 2 GOPs do not have a voltage schedule to follow beginning 5/16/2026?

Likes 0

Dislikes 0

Response

Alan Wahlstrom - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP

Answer No

Document Name

Comment

SPP has collaborated with ISO/RTO Council Standards Review Committee (SRC) and support their comments

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

ERCOT joins the comments submitted by the ISO/RTO Council (IRC) Standards Review Committee (SRC) and adopts them as its own.

Likes 0

Dislikes 0

Response

Joshua Phillips - Southwest Power Pool, Inc. (RTO) - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)

Answer No

Document Name

Comment

The ISO/RTO Council (IRC) Standards Review Committee (SRC) believes the implementation plan should be revised to more clearly convey what appears to be the underlying intent. Specifically, the sentence "Reliability Standards that specify they are applicable only to BES Facilities will not be enforceable on Category 2 facilities unless there is a specific Reliability Standards project that revises them to include Category 2 facilities" should be deleted from page 2 of the implementation plan to reduce the risk of confusion that could otherwise arise in the context of Reliability Standards like

EOP-004-4. The Applicability section of EOP-004-4 does not explicitly indicate EOP-004-4 applies only to BES Facilities, yet it has been identified as a standard that will not apply to Category 2 non-BES resources as currently written.

Additionally, the first paragraph on page 3 of the implementation plan should be revised to read as follows to further clarify the apparent intended meaning of the implementation plan: "All other Reliability Standards using GO and GOP **remain applicable and enforceable only to GO/GOP BES facilities but** may become applicable and enforceable to generation assets that meet the Category 2 criteria upon their revision² and in accordance with their respective revised Reliability Standard language and Implementation Plans."

Consistent with the modifications proposed above, the SRC understands the implementation plan outlines eight standards that will apply to non-BES Category 2 generation assets included in the proposed new definitions for Generation Owner and Generation Operator according to the schedule provided in the implementation plan. Footnote 1 links to a document that outlines the additional standards that need to be revised before they can apply to non-BES Category 2 generation assets. The implementation plan and the document linked in footnote 1 do not include enough information about how each standard was analyzed, which creates ambiguity regarding how to determine if a standard applies to Category 2 generation assets.

For example, it is clear why EOP-012-3 would not apply to Category 2 generation assets, but it is not immediately clear why EOP-004-4 would not apply to Category 2 assets. The April 2025 Webinar provided some detail regarding the general analytical approach that was used and why EOP-004-4 would need to be revised to apply to Category 2 generation assets, but only providing that level of detail in the webinar is insufficient. Rather, the implementation plan should include that level of standard-specific detail for each standard that requires revisions to apply to Category 2 generation assets.

*ISO-NE abstains from this comment

Likes	0
Dislikes	0

Response

Scott Thompson - TXNM Energy - 3

Answer No

Document Name

Comment

XNM would like to see a phased-in implementation. The phased-in compliance dates for the listed standards do not allow enough time for coordination between newly registered GOs / GOPs and applicable BAs, TOPs, TOs, and other entities for compliance with those standard requirements. Some specified duration after registration would ensure proper coordination is achievable. The Implementation Plan contains no mechanism to ensure that these entities receive notice of Registration for these new CAT 2 GO/GOPs with enough lead time to coordinate with the newly registered entities. The drafting team asserts that this scenario is not different than any new GO/GOP coming online and needing to coordinate with the BA/TOP/TP/PC/RCs; however, the proposed implementation plan differs substantially from that scenario since there can be any number of new CAT 2 GO/GOPs becoming active Registered Entities, and in some Regions this may be a significant number. In many cases these Entities may be completely new to the NERC Standard compliance process, and may be unaware that coordination with the BA/TOP/TP/PC/RCs is necessary. The existing Entities have no insight into third-party GO/GOPs that are to become Registered since this information is only available to the Regions.

Likes	0
Dislikes	0

Response

Alison MacKellar - Constellation - 5

Answer No

Document Name

Comment

Constellation concurs with NAGF comments. The proposed phased implementation plan is too quick to implement efficiently and cost effectively. More time is needed in order to effectively comply with the standards and build/collect data.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

James Merlo - NAGF - NA - Not Applicable - NA - Not Applicable

Answer No

Document Name

Comment

The NAGF would like to offer the following comments:

The Implementation Plan lists IRO-010-5, MOD-032-1 and TOP-003-6.1 as Reliability Standards as applicable and enforceable to generation assets that meet Category 2 criteria in the modified GO and GOP definitions. However, the 2022-02 SAR indicates that changes are to be made to the these standards to address three categories of IBR, including these same generation assets.

The 2024-01 SDT and the FERC Order 901 Milestone 3 project 2022-02 SDT should coordinate as the information in this implementation plan seems to contradict the SAR accepted by the Standards Committee in the 2022-02 project.

The NAGF is concerned with the Implementation Plan compliance deadline of May 16, 2026, or otherwise 12-month period, for the category 2 non-BES facilities to be compliant with the eight listed standards, with particular concern for MOD-032 and VAR-002 compliance, as well as the standards previously mentioned. The NAGF would suggest at least a 24-month Implementation Plan timeline from the date of FERC approval.

The NAGF also believes there needs to be some language in the standards to ensure that the RC/BA/TOP is involved in the overall implementation since the Category 2 GO/GOP entities will need information from RC/BA/TOP to be compliant. For example, GOPs are required to follow voltage schedules specified by their TOPs under VAR-002. However, if TOPs do not provide voltage schedules to the GOPs for these Category 2 IBRs, how would the GOPs know what they need to follow (along with changes required from SCADA like voltage limits to set up alarms, etc.).

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 6

Answer	No
Document Name	
Comment	
<p>AZPS is of the opinion that there should be a phased in approach for Category 2 entities to comply with the proposed eight Reliability Standards. Whether new Category 2 registrants or registrants with newly registered Category 2 resources, all entities will need time to establish system configurations, set up SCADA systems, data points, create or update processes, procedures, provide training, and create and/or modify existing controls.</p> <p>The industry is currently engaged with regional CEAs to identify IBR Category 2 assets. As such, given that the identification of Category 2 resources has not yet been finalized, proceeding with investments and full implementation would present financial challenges and complexities for entities. APS provides the following examples of the work that may be required:</p> <p>TOP-003-4 - Provide real time data to the TOP and BA</p> <p style="padding-left: 40px;">Task 1: Review current control systems and assess capabilities</p> <p>Task 2: Define existing or create a new Plant Indicator (PI) points</p> <p>Task 3: Pull required data and send it to the TOP and BA</p> <p>Work with TOP and BA to define what a mutually agreeable format may be</p> <p>(Distribution assets are not typically tracked by the TOP. As such, new transducers and fiber optic communications systems may need to be engineered and installed).</p> <p>VAR-001-5 - Voltage and Reactive Control</p> <p>Task 1: Review current control systems and assess capabilities</p> <p>Task 2: Design AVR controller logic to meet industry standards</p> <p>(May need to upgrade the control system to implement)</p> <p>Task 3: Implement and test new AVR controllers</p> <p>VAR-002-4.1 – Generator Operations for Maintaining Network Voltage Schedules</p> <p>Task 1: Current control systems will need to be reviewed and assessed for capabilities.</p> <p style="padding-left: 40px;">Task 2: Design AVR controller logic to meet industry standards</p> <p>May need to upgrade the control system to implement</p> <p>Will need to upgrade Plant Indicator (PI) points at control center</p>	

Will need to modify alarm indication at control center

Task 3: Will need to modify alarm response protocols

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

The implementation plan lists IRO-010-5 and TOP-003-6.1 as Reliability Standards as applicable and enforceable to generation assets that meet Category 2 criteria in the modified GO and GOP definitions. However, the 2022-02 SAR indicates that changes are to be made to the MOD-032, IRO-010, and TOP-003 standards to address three categories of IBR, including these same generation assets.

The 2024-01 SDT and the FERC Order 901 Milestone 3 project 2022-02 SDT should coordinate as the information in this implementation plan seems to contradict the SAR accepted by the SC in the 2022-02 project.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer No

Document Name

Comment

Constellation concurs with NAGF comments. The proposed phased implementation plan is too quick to implement efficiently and cost effectively. More time is needed in order to effectively comply with the standards and build/collect data.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

John Pearson - ISO New England, Inc. - 2

Answer

No

Document Name

Comment

EOP-004-4 should be added to the list of Reliability Standards on page 2. This would provide NERC with information regarding multiple IBR facilities with damage or destruction or threats to those facilities. Modified language would read:

These Reliability Standards are as follows:

• BAL-001-TRE-2

• EOP-004-4

• IRO-010-5

• MOD-032-1

• PRC-012-2

• PRC-017-1

• TOP-003-6.1

• VAR-001-5

• VAR-002-4.1

Likes 0

Dislikes 0

Response

Alyssia Rhoads - Public Utility District No. 1 of Snohomish County - 1

Answer

No

Document Name

Comment

The definition needs work for clarity on projects primarily used for load mitigation behind the meter.

Likes 0

Dislikes 0

Response

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer No

Document Name

Comment

The proposed Implementation Plan refers to NERC’s review of all active Reliability Standards “to evaluate their potential applicability and enforceability to Category 2 IBR” and a subsequent analysis including a “more thorough review of each Reliability Standard and requirement for the potential introduction of reliability gaps, compliance gaps, or ambiguity...” NERC’s analysis identified eight (8) Reliability Standards subject to this project. Notwithstanding NERC’s prior review, it is not evident in the project documentation that imminent reliability risks exist that warrant mandatory compliance of newly registered Category 2 GO/GOPs commensurate with an effective date of May 16, 2026. If urgent reliability risks are indicated, NERC and industry can rely on its long-standing capability to resolve those concerns in a timely manner. Absent urgent reliability risks, Category 2 GO/GOPs should be afforded an additional 12 months to implement the eight (8) Reliability Standards identified by this project. This will also allow time for RCs, BAs, and TOPs to provide data specification formats, MOD-032 coordination, and allow time for coordination of voltage measurements points or conversions for VAR-001/002(WECC variance). Alternatively, NERC could also allow an abeyance period pf 12 months for these eight (8) standards.

Likes 0

Dislikes 0

Response

Ben Hammer - Western Area Power Administration - 1

Answer No

Document Name

Comment

It is Unclear to cat. 2 GO/GOP which standards to follow. If a new cat. 2 compliance officer picks up a standard they will have no idea if it applies to them, unless they know to look for Project 2024-01 to see where we are at with the implementation plan, and also do a comparison on the revision history of the standard to see if it was revised after implementation of 2024-01.

Never ending implementation plan. If a standard applicable to GO or GOP is not modified, it will never be applicable to cat. 2 GO/GOP. There is an ‘unbound’ implementation plan that does not have an end state.

Likes 0

Dislikes 0

Response

Zahid Qayyum - New York Power Authority - 5

Answer	No
Document Name	
Comment	
<p>NYPA agrees with the proposed definition; however, we have concerns regarding the implementation plan. The Project 2022-02 SAR outlines changes to the MOD-032, IRO-010, and TOP-003 standards to address three categories of IBR, including the same generation assets. FERC 901 milestone projects are addressing the reliability gaps possess by IBRs. Milestone 2 projects are addressing the performance requirements of IBRs during a grid disturbance. So this milestone projects identified improvement needed in the current standard and corrected it. Milestone 3, on the other hand, focuses on model validation and verification. This means any necessary updates to model data resulting from these corrections must be communicated through a uniform model framework to ensure consistency and that all entities follow the same process to mitigate the identified gaps. Given this, requiring new Category 2 GOs to adhere to old modeling standards despite the reliability gaps already identified in the SAR does not provide any additional reliability benefits. An ongoing initiative under Project 2022-02 is actively addressing these gaps in the current process. Therefore, it would be more logical to reference the updated version of the standards. Also we believe there should be a coordination with this SDT and the related milestone project SDT.</p> <p>PRC-017 already has an established inactive date of 3/31/2027. If a Category 2 entity is part of a RAS(even though it is more unlikely) , as outlined in the implementation plan, it requires them to have a maintenance plan for the relays that may be used to trip them off. PRC-005 already covers this requirement and is applicable only to BES units. Therefore, for approximately 9 months, a Category 2 entity will need to maintain a plan for the relays used in the RAS, but this requirement will eventually be removed. Additionally, the implementation plan is silent regarding PRC-005.For a new facility, it would be more cost-effective to exclude PRC-017 from the implementation plan and modify PRC-005 at a later stage to address this issue.</p>	
Likes	0
Dislikes	0
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	No
Document Name	
Comment	
<p>Recommend reconsidering the phased in approach to the existing 8 standards that were identified to a more flexible timeframe. A specific date of May 16, 2026 may not be achievable by certain industry facilities.</p>	
Likes	0
Dislikes	0
Response	
Josh Schumacher - Black Hills Corporation - 6, Group Name Black Hills Corporation Segments 1, 3, 5, 6	
Answer	No
Document Name	
Comment	

Black Hills Corporation does not agree with the proposed Implementation Plan, we do not believe it has addressed the industry concern regarding separately defining the new entities as GO/GOP Category 2. Black Hills Corporation believes this will cause confusion for new entities that will have to comply. Additionally, the eight (8) Reliability Standards cited in the Implementation Plan for GO/GOP Category 2 were left unchanged and do not specifically identify this new "Category 2" group in the "Applicability" section of the Standards. It is much more clearly defined in the new Reliability Standards PRC-028-1, PRC-029-1 & PRC-030-1 which list "Facilities" in the "Applicability" section as "BES Inverter-Based Resources" and "Non-BES Inverter-Based Resources...". Black Hills Corporation is concerned with NERC setting the precedent of being able to change the scope of inclusion for NERC Reliability Standard "Applicability" simply by changing a definition in the NERC Glossary of Terms.

Another concern for Black Hills Corporation is that the eight (8) Reliability Standards identified for GO/GOP Category 2 compliance do not clearly identify what the RC, BA, and TOP need to do in order to communicate to the new Category 2 GO/GOPs. An example of this is that under IRO-010 and TOP-003 it is unclear if RC/BA/TOPs are expected to provide their data specifications to the new Category 2 GO/GOPs prior to the compliance date of 5/16/2026. This same issue could cause a problem for VAR-002 communications.

Likes 2

Adam Burlock, N/A, Burlock Adam; Platte River Power Authority, 3, Kiess Richard

Dislikes 0

Response

Karen Demos - NextEra Energy - Florida Power and Light Co. - 3

Answer

No

Document Name

Comment

In regard to the proposed implementation plan, Nextera proposes the date of implementation be changed from May 2026 to December 2026 to ensure there are no constraints in the registration process.

Likes 0

Dislikes 0

Response

Sing Tay - AES - Indianapolis Power and Light Co. - 3

Answer

No

Document Name

Comment

AES Indiana supports the comments provided by AES US Renewables.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

The phased-in compliance dates for the listed standards do not allow enough time for coordination between newly registered GOs / GOPs and applicable BAs, TOPs, TOs, and other entities for compliance with those standard requirements. Some specified duration after registration would ensure proper coordination is achievable.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

See Question 3 response - Duke Energy does not agree with proposed Implementation Plan.

Likes 0

Dislikes 0

Response

Ruchi Shah - AES - AES Corporation - 5

Answer No

Document Name

Comment

AES US Renewables agrees with the list of standards that will become effective in May 2026. However, we are concerned that without more details being provided in the Implementation Plan, Category 2 GOs and GOPs may not be able to meet the requirements when the standards become effective. A couple of examples:

1. Under IRO-010 and TOP-003, the data specifications from RC, BA, TOP may cover requirements on EOP-012 data, MOD-025 data and data associated with other standards. Since some of these standards (eg: EOP-012, MOD-025) are not going to be applicable to Category 2 GOs/GOPs beginning in May 2026, what are the expectations for Category 2 GOs/GOPs to comply and fulfill the data specification requirements? Currently, there is no language specified in the Implementation Plan concerning this. If Category 2 GOs/GOPs do not provide data related to EOP-012 or other standards that are not effective yet for Category 1BRs, is that considered to be a violation? Another concern is whether the applicable RC/BA/TOP of

these Category 2 GOs/GOPs know if they are required to send the data specifications to the Category 2 GOs/GOPs, and do they need to send it prior to the effective date (5/16/2026) and give the new Category 2 entities time to understand and fulfill the data specification requirements. What are the compliance implications if Category 2 GOs and GOPs do not have a copy of the data specifications by the effective date of 5/16/2026 and therefore do not have information to fulfill or provide based on requirements in the data specs?

2. Under VAR-002, Category 2 GOPs are required to follow the voltage schedule provided by its TOP. Typically, TOPs (per VAR-001) are required to send voltage schedules to their

GOPs. However, it is not clear in the Implementation Plan on whether TOPs are required to notify the Category 2 GOPs of voltage schedules prior to the effective date (5/16/2026). What are the compliance implications if Category 2 GOPs do not have a voltage schedule to follow beginning 5/16/2026?

Additionally, during the 4/23/2025 webinar, the feedback provided was for Category 2 GOs and GOPs to reach out to their RCs, BAs and TOPs. However, if the RCs, BAs and TOPs have no obligations under the Implementation Plan to respond to requests from Category 2 GOs and GOPs, what other options do Category 2 GOs and GOPs have in order to be compliant with all the eight standards starting on 5/16/2026?

Based on the examples provided above, we request that the drafting team take a closer look at each of the eight standards from the perspective of the Implementation Plan and what needs to occur in order for the Category 2 GOs and GOPs to be in compliance by the effective date. The review should include expectations for applicable entities (other than the Category 2 GOs and GOPs) in those eight Standards to fulfill in order for Category 2 GOs and GOPs to meet compliance starting on 5/16/2026 or a later date pending FERC approval.

AES understands that the eight Standards in the Implementation Plan were identified as applicable to Category 2 IBRs because they do not use Defined Terms such as “Facilities” or “BES” which would exclude applicability. Do entities need to do their own evaluation to confirm that no other Standards apply to the new Category 2 IBRs? Or can NERC provide any assurance that the other Standards will not be enforceable if the ERO makes a different determination on applicability than outlined in the Implementation Plan. Based on the feedback provided during the 4/23/2025 webinar that each entity will need to do their own evaluation, if individual entities are expected to assess applicability to their own Category 2 sites, it would help if there was additional guidance or statement in the Implementation Plan on what exclusionary language NERC has identified so entities can use this in their determination.

Likes 2	AES - Indianapolis Power and Light Co., 3, Tay Sing; Adam Burlock, N/A, Burlock Adam
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Dislikes 0	
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Response

Kevin Conway - Western Power Pool - 4

Answer	No
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Document Name	
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Comment

Again, the Implementation plan continues to use the Category 2 terminology which is not defined in the NERC Standards. Defining them within another definition is not good technical writing practice.

The May 16, 2026, date should be changed to the more typical language relating to the FERC approval being published in the Federal Register. May 16, 2026, is a Saturday in the middle of the month and doesn't seem to have technical justification. Most NERC standards begin enforcement at the beginning of the month or quarter, not an arbitrary day in the middle of the month.

Likes 1	Adam Burlock, N/A, Burlock Adam
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Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer

No

Document Name

Comment

Regarding the eight reliability standards that NERC SDT identified that do not require any standard revisions to implement the modified definitions, it is unclear how entities can effectively identify the applicable standards and track the compliance dates without a trigger like a standard revision. In this case, entities have to track the implementation plan to identify the applicable standards and the compliance dates. It is not recommended to assume that entities can follow an implementation plan developed for a group of standards to meet the modified definitions for the NERC Glossary Terms without revising the scope of the applicable reliability standards.

It is recommended that NERC forms a new SDT to identify all the reliability standards that apply to BES Facilities, which may need modifications to the scope to include Category 2 GOs/GOPs.

Likes 1

Adam Burlock, N/A, Burlock Adam

Dislikes 0

Response

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

Answer

No

Document Name

Comment

It is unclear to category 2 GO/GOP which standards to follow. If a new category 2 compliance officer picks up a standard they will have no way of knowing if it applies to them, unless they know to look for Project 2024-01 to see the status of the implementation plan, and do a comparison on the revision history of the standard to see if it was revised after implementation of 2024-01. The current NERC one-stop-shop spreadsheet will not reflect Project 2024-01 implementation on all impacted standards. Instead, it is proposed that each standard be modified. This will allow clear indication in the standard itself, as a standalone document, as to the applicability to category 2 GO/GOP.

The current plan does not have an end date for the implementation plan. If a standard applicable to GO or GOP is not modified, it will never be applicable to category 2 GO/GOP.

If each standard is modified, any standard remaining unmodified will not be applicable to category 2 GO/GOP.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

While the Implementation Plan aligns with the directives in FERC Order RD22-4-000, there is room for improvement in clarity and consistency. Although the proposed definitions for GO and GOP, do include language for Category 2 facilities, the eight Reliability Standards cited in the Implementation Plan are left unchanged by this project and do not separately identify the Category 2 facilities in their Applicability section, unlike PRC-028-1, PRC-029-1 and PRC-030-1. It is understood that after the Glossary update the terms GO and GOP will be inclusive of Category 2 facilities, but the failure to clearly identify Category 2 facilities within the Applicability Section of these Reliability Standards will needlessly create confusion and require reference to outside documents to verify effective dates when simple modifications could be made to limit confusion and make the standards complete and self-contained. The current approach is contrary to NERC’s own “Ten Benchmarks for an Excellent Reliability Standard”, where Benchmark 6 states that “Reliability standards shall be complete and self-contained. The standards shall not depend on external information to determine the required level of performance;” and where Benchmark 1 states that “Each reliability standard shall clearly identify the functional classes of entities responsible for complying with the reliability standard, with any specific additions or exceptions noted.”

To address these concerns, the Scope of the SAR could be expanded to allow editing of the 8 Reliability Standards to clarify each Applicability Section. Another option would be for the revision of the individual standards to be taken up under a different SAR while the Implementation Plan for this project states that no current standard versions will be applicable to Category 2 facilities except as indicated in their individual Implementation Plans.

Likes 0

Dislikes 0

Response

Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza

Answer Yes

Document Name

Comment

The implementation plan lists IRO-010-5, MOD-032-1 and TOP-003-6.1 as Reliability Standards as applicable and enforceable to generation assets that meet Category 2 criteria in the modified GO and GOP definitions. However, the 2022-02 SAR indicates that changes are to be made to the these standards to address three categories of IBR, including these same generation assets.

The 2024-01 SDT and the FERC Order 901 Milestone 3 project 2022-02 SDT should coordinate as the information in this implementation plan seems to contradict the SAR accepted by the SC in the 2022-02 project.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

FirstEnergy supports the Implementation Plan.

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Laura Somak, Salt River Project, 3, 5, 6, 1; Mathew Weber, Salt River Project, 3, 5, 6, 1; Matthew Jaramilla, Salt River Project, 3, 5, 6, 1; Timothy Singh, Salt River Project, 3, 5, 6, 1; - Israel Perez

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

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**Nick Leathers - Nick Leathers On Behalf of: David Jendras Sr, Ameren - Ameren Services, 3, 6, 1; - Nick Leathers****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC****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

Thomas Breen - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kera Schwartz - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

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

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Foung Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kris Kirkegaard, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 5, Group Name DTE Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

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

Bob Cardle - Bob Cardle On Behalf of: Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle

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; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike

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	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Colleen Campbell - Proenergy Services - 6 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Michael Goggin - Grid Strategies LLC - 5	
Answer	
Document Name	
Comment	
<p>We agree with the list of standards listed in the proposed Implementation Plan. However, our concern is that Implementation Plan for the eight Reliability Standard identified for Category 2 Compliance do not clearly identify exactly what RCs, BAs or TOPs need to do in order to communicate to the new Category 2 GOs and GOPs their Requirements as contained within some of the Standards identified. For example, under IRO-010 and TOP-003, it is unclear whether the RCs/BAs/TOPs are expected to provide their data specifications to the new Category 2 GOs and GOPs prior to the effective date of 5/16/2026? Moreover, the new Category 2 GOs and GOPs will need some time to familiarize themselves with these Standards and their obligations related to the data specifications received and their obligations regarding gathering and sending this data to their respective RCs, BAs, and TOPs. We are also of the opinion that similar problems will be encountered with VAR-002. Again, it is unclear whether TOPs are required to provide the voltage schedules to Category 2 entities prior to 5/16/2026 in order to allow the owners of Category 2 IBRs the time to set up SCADA systems to follow the specified voltage schedules? If Category 2 GOs and GOPs are required to reach out to their RCs, BAs and TOPs prior to 5/16/2026, what are these RCs, BAs and TOPs' obligations to respond to the requests in a timely manner? While we have only offered two examples of potential problems that need to be addressed, we do not support the approval of the Implementation Plan until all eight Reliability Standards identified are thoroughly reviewed by the drafting team and needed direction included in the next version of this document.</p>	
Likes	0
Dislikes	0
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	
Document Name	
Comment	
<p>The proposed Implementation Plan (a) identifies 8 (eight) currently adopted and effective Standards as applicable and enforceable to generation assets that meet the Category 2 criteria and (b) clarifies that no other adopted and effective Standards will be enforceable to Category 2 GO and GOP functions and associated assets until a Standard is revised to explicitly identify its applicability on the Category 2 GO facilities.</p> <p>Please confirm whether our understanding is accurate and modify the wording in the draft Implementation Plan to state this explicitly.</p>	
Likes	0
Dislikes	0
Response	

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

Thomas Foltz - AEP - 5

Answer

Document Name

Comment

While AEP recognizes that this project is only in its first phase, we would like to restate our previous comments regarding Phase 2. As we stated in the previous comment period on the SAR itself, AEP believes that the Category 2 descriptor for GOs and GOPs is explicitly clear as currently specified in the NERC ROP, and requests that plans for this second phase of the SAR not be pursued in any way. Our objections notwithstanding, if the primary intent is to determine which standards fall into a Category 2 classification, then we recommend a different approach be taken from what is suggested in the SAR. AEP sees value in clarifying the assets that the SAR refers to as Sub-BES DERs, but we do not believe that establishing a glossary definition for Sub-BES DERs is the best way to achieve this clarity. We also do not agree with pursuing glossary definitions for Non-Material DERs and IBR-DERs which are clearly out of scope. We believe a preferable approach would instead be for the establishment of new Functional Entities such as GO Category 1, GO Category 2, GOP Category 1, and GOP Category 2, the categories for which are provided in the two new definitions for GO and GOP. These two categorizations are provided within the new ROP definitions for GO and GOP, but if an entity cannot explicitly register as a Category 1 or 2, and thus cannot be added as a Functional Entity within a standard's Applicability, then that specificity cannot be extended to the standards themselves. While we acknowledge that this would take time for them to be added to the ROP, for entities to register for them as necessary, and for all the necessary standards to be revised, we believe the final results would be far superior to that of simply pursuing glossary definitions of the categorized assets. In addition, we believe establishing new Functional Entities for these categories would allow improvements to be made for Category 1, as the current definitions in the ROP do not explicitly limit the category to the BES, unlike Category 2 which is clearly non-BES in nature.

AEP would also like to offer comment on the yet to be developed definition for "in scope" assets, referred to in the SAR as "Sub-BES IBRs." Whatever name is eventually developed and proposed, AEP would recommend that the name itself be such that it is blatantly obvious that the assets are in scope. For example, it is obvious from the name "BES IBR's" what the asset is (an IBR) as well as that it is in scope (by using BES as a descriptor). However, a name like Sub-BES IBR does not provide the "ex ante certainty" described in the SAR. From the name itself, it is only clear what the asset is (once again, an IBR) and that it is not a BES asset. It is not clear from the name whether or not it is in scope by virtue of the Category 2 descriptions, as assets that are and are-not not brought into scope from Category 2 could BOTH be considered Non-BES IBRs.

Likes 0

Dislikes 0

Response

Jessica Cordero - Unisource - Tucson Electric Power Co. - 1

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO

Answer

Document Name

Comment

The proposed approach creates difficulty in implementing outside of the US jurisdiction. To adopt a standard in Manitoba, it has to be adopted by the Provincial Government of Manitoba. Only standards as drafted at the time of adoption are enforceable or auditable in Manitoba. A change to the scope based on a definition change will not result in a scope change to the standard in this jurisdiction. It is proposed that each standard be modified, so that a new identifiable version is created and can be adopted in all jurisdictions.

Likes 1

Adam Burlock, N/A, Burlock Adam

Dislikes 0

Response

Kevin Conway - Western Power Pool - 4

Answer

Document Name

Comment

We appreciate the work and consideration the Drafting Team has put into these definitions. We feel that the application of the proposed definitions will continue to be problematic without separate definitions for Category 1 and 2 references.

Likes 1

Adam Burlock, N/A, Burlock Adam

Dislikes 0

Response

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

Answer

Document Name

Comment

FirstEnergy has no additional comments.

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

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer

Document Name

Comment

It is not clear in NERC Standards (e.g. VAR-001/VAR-002) that require the TOP to communicate generator voltage or Reactive Power schedules (voltage schedules) to the GOP and how that would apply to Category 2 GOPs interconnected to the distribution system.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

FERC’s November 17, 2022 IBR Registration Order in Docket No. RR22-4-000 directs NERC to ensure IBRs are subject to mandatory standards for the purpose of mitigating potential impacts to the Bulk-Power System. (See, e.g., Paragraph 33). This purpose is only accomplished if registration is conducted, and standards are implemented, in a manner that allows for full compliance with the applicable requirements. The Implementation Plan is partially inconsistent with the Order in the sense that it identifies eight standards that come into effect without appropriate coordination between and among the Registered Entities necessary for full compliance. Most of the eight identified standards require coordination and exchange of information to implement them, but the Implementation Plan does not provide a mechanism for that coordination before the standards become effective.

The SDT asserts that the CAT 2 GO/GOP Registrations shall become active on May 15, 2026, with the eight identified Standards becoming enforceable for all Entities on May 16, 2026. The Implementation Plan contains no mechanism to ensure that these entities receive notice of Registration for these new CAT 2 GO/GOPs with enough lead time to coordinate with the newly registered entities. The drafting team asserts that this scenario is not different than any new GO/GOP coming online and needing to coordinate with the BA/TOP/TP/PC/RCs; however, the proposed implementation plan differs substantially from that scenario since there can be any number of new CAT 2 GO/GOPs becoming active Registered Entities, and in some Regions this may be a significant number. In many cases these Entities may be completely new to the NERC Standard compliance process, and may be unaware that coordination with the BA/TOP/TP/PC/RCs is necessary. The existing Entities have no insight into third-party GO/GOPs that are to become Registered since this information is only available to the Regions.

Duke Energy suggests that there be language added to the Implementation Plan that compels the Regions responsible for Registration of these new Entities to inform the existing Entities to which these GO/GOPs will be 'mapped', that the new registrations are forthcoming, with at least a 90-day notice. This will allow compliance activities to be executed and for evidence such as the issuing of voltage schedules, data specifications, etc. to be compiled and ready for May 16, 2026, 'day one' compliance. Without this assurance, it is possible that the existing Entities will be unaware of new CAT 2 GO/GOPs, and this represents an unacceptably elevated compliance risk.

Additionally, Duke Energy suggests that a comprehensive list of Standards indicating 'applicable' and 'non-applicable' to both Category 1 and Category 2 GO/GOPs (similar to the content of the NERC GO-GOP Analysis.docx file referenced in Footnote 1) should be included here as an Appendix rather than linked via the footnote, along with the technical rationale for the applicability decision to avoid confusion for Entities and CEAs. Even if this is included it may be unclear to Entities why a Category 2 GO/GOP should have to be compliant with VAR-002-4.1 but not with PRC-005-6 or FAC-008-5, for example. Since NERC Staff have gone through the exercise of evaluating each standard, there is no reason to withhold this analysis from the Registered Entities who are required to comply with the standards.

Likes	1	AES - Indianapolis Power and Light Co., 3, Tay Sing
Dislikes	0	

Response

Mohamad Elhousseini - DTE Energy - Detroit Edison Company - 5, Group Name DTE Energy

Answer	
Document Name	
Comment	

In the implementation plan, the phased-in date for MOD-032-1 (May 16, 2026), we believe generation assets that meet CAT2 in the modified GO/GOP definition need more time to comply as this may require MOD-026 tests and PRC-024 studies.

Likes	0	
Dislikes	0	

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer	
Document Name	
Comment	

Reclamation recommends that two separate definitions be provided; one for GO/GOP non-IBR resources and one set of definitions for GO/GOP IBR resources. Consistency among standards is not being achieved with IBR resources additions. This would avoid possible confusion and convolution of terms.

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Kris Kirkegaard, Balancing Authority of Northern California, 1; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD and BANC

Answer

Document Name

Comment

SMUD and BANC agree with the proposed changes to the definitions of Generator Owner (GO) and Generator Operator (GOP). We appreciate that these definitions align perfectly with those outlined in the NERC Rules of Procedure.

Likes 0

Dislikes 0

Response

Zahid Qayyum - New York Power Authority - 5

Answer

Document Name

Comment

No additional comments.

Likes 0

Dislikes 0

Response

Thomas Breen - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1

Answer

Document Name

Comment

While the Implementation Plan aligns with the directives in FERC Order RD22-4-000, the Implementation Plan could be improved in clarity and consistency. The proposed definitions for GO and GOP, do include language for Category 2 facilities, the eight Reliability Standards cited in the Implementation Plan are left unchanged by this project and do not separately identify the Category 2 facilities in their Applicability section, unlike PRC-028-1, PRC-029-1 and PRC-030-1. It is understood that this was done for expediency, and that after the Glossary update the terms GO and GOP will be inclusive of Category 2 facilities, but the failure to clearly identify Category 2 facilities within the Applicability Section of these Reliability Standards will needlessly create confusion and require reference to outside documents to verify effective dates. Simple modifications could be made to limit confusion and make the standards complete and self-contained. The current approach is contrary to NERC’s own “Ten Benchmarks for an Excellent Reliability Standard”, where Benchmark 6 states that “Reliability standards shall be complete and self-contained. The standards shall not depend on external information to determine the required level of performance;” and where Benchmark 1 states that “Each reliability standard shall clearly identify the functional classes of entities responsible for complying with the reliability standard, with any specific additions or exceptions noted.”

The Scope of the SAR could be expanded to allow editing of the 8 Reliability Standards to clarify each Applicability Section. An alternative would be for the revision of the individual standards to be taken up under a different SAR while the Implementation Plan for this project states that no current standard versions will be applicable to Category 2 facilities except as indicated in their individual Implementation Plans.

Additionally, of the eight Reliability Standards identified for Category 2 Compliance, some have lengthy original Implementation Plans and requirements for Registered Entities beyond the GO and GOP. The statement, “For those generation assets that meet the Category 2 criteria in the modified definitions, GOs and GOPs shall comply with the below-listed Reliability Standards the later of May 16, 2026, or as otherwise provided for by the applicable governmental authorities in that jurisdiction on the registration deadline will lead to,” is far too vague and simplistic for these complex standards. The intent is surely not for only the GO and GOP to have to comply by those dates? What about the RCs, BAs or TOPs? For example, the latest revisions of IRO-010 and TOP-003 allowed 18 months for implementation recognizing that it would take significant time to develop revised data and information specifications under Reliability Standards IRO-010-5 and TOP-003-6. While much of the process will already be defined by the Category 2 registration deadline, significant time will also be necessary for expanding these requirements to newly registered entities and newly identified facilities. Moreover, the new Category 2 GOs and GOPs will need some time to familiarize themselves with these Standards and their obligations related to the data specifications received and their obligations regarding gathering and sending this data to their respective RCs, BAs, and TOPs. Similar problems will likely be encountered with VAR-002. Again, it is unclear whether TOPs are required to provide the voltage schedules to Category 2 entities prior to 5/16/2026 in order to allow the owners of Category 2 IBRs the time to set up SCADA systems to follow the specified voltage schedules.

For the reasons outlined above, the Implementation of each of these standards to Category 2 facilities needs an independent approach that does not only just reference GO and GOP compliance, but also takes into account the responsibility and burden to all applicable Registered Entities.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE inquires as to whether the section of the implementation plan, Definitions Proposed for Retirement, needs to be included, as it does not mention any definitions specifically. Is it referring to the prior versions of the definitions of Generator Operator and Generator Owner?

Likes	0
Dislikes	0
Response	
Ben Hammer - Western Area Power Administration - 1	
Answer	
Document Name	
Comment	
<p>Difficulty implementing outside of US jurisdiction. In Canada there are varying rules for implementing the NERC standards. In Manitoba at least, the implementation plans are not considered when adopting a standard (it is all or nothing). This creates a grey area because the same definition is not used in the same way across each standard. As confusing as it may be to an entity it will be even worse for an audit entity like the MRO to understand which term they are using in this jurisdiction.</p>	
Likes	0
Dislikes	0
Response	
Amy Key - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	
Document Name	
Comment	
<p>Of the eight Reliability Standards identified for Category 2 Compliance, some have lengthy original Implementation Plans and requirements for Registered Entities beyond the GO and GOP. The statement in this Project's Implementation Plan, "For those generation assets that meet the Category 2 criteria in the modified definitions, GOs and GOPs shall comply with the below-listed Reliability Standards the later of May 16, 2026, or as otherwise provided for by the applicable governmental authorities in that jurisdiction on the registration deadline will lead to," is far too vague and simplistic for these complex standards. The intent is surely not for only the GO and GOP to have to comply by those dates. What about the RCs, BAs or TOPs? For example, the latest revisions of IRO-010 and TOP-003 allowed 18 months for implementation recognizing that it would take significant time to develop revised data and information specifications under Reliability Standards IRO-010-5 and TOP-003-6. While much of the process will already be defined by the Category 2 registration deadline, significant time will also be necessary for expanding these requirements to newly registered entities and newly identified facilities. Moreover, the new Category 2 GOs and GOPs will need some time to familiarize themselves with these Standards and their obligations related to the data specifications received and their obligations regarding gathering and sending this data to their respective RCs, BAs, and TOPs. Similar problems will likely be encountered with VAR-002. Again, it is unclear whether TOPs are required to provide the voltage schedules to Category 2 entities prior to 5/16/2026 in order to allow the owners of Category 2 IBRs the time to set up SCADA systems to follow the specified voltage schedules.</p> <p>For the reasons outlined above, the Implementation Plan for each of these standards to Category 2 facilities needs an independent approach that does not only just reference GO and GOP compliance, but also takes into account the responsibility and burden to all applicable Registered Entities.</p>	
Likes	0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC

Answer

Document Name

Comment

No Additional Comments

Likes 0

Dislikes 0

Response

Usama Tahir - Seminole Electric Cooperative, Inc. - 3

Answer

Document Name

Comment

Seminole recommends either omitting the words “and maintains” wherever the definition says “owns and maintains,” or replacing “and maintains” with “and is ultimately responsible for maintenance.” There could be entities that own generating Facility(ies) that is/are maintained by a third party.

How will community-owned community solar be incorporated into these definitions? Per the U.S. Department of Energy’s document at this link (<https://docs.nrel.gov/docs/fy23osti/86210.pdf>), one of the ownership options for community solar projects is as follows: “The solar project and solar assets are wholly financed and owned by local individuals and entities.” Could a large community solar project wrap in individual owners as GOs?

If a generator operator enters into a generator interconnection agreement with a TOP and the TOP owns and operates the interconnection equipment, is the TOP performing Interconnection Operating Services for the generating Facility(ies)? If yes, then would this generator operator not be classified as a GOP pursuant to this definition?

Likes 0

Dislikes 0

Response

Melanie Wong - Seminole Electric Cooperative, Inc. - 5

Answer

Document Name

Comment

Seminole recommends either omitting the words “and maintains” wherever the definition says “owns and maintains,” or replacing “and maintains” with “and is ultimately responsible for maintenance.” There could be entities that own generating Facility(ies) that is/are maintained by a third party.

How will community-owned community solar be incorporated into these definitions? Per the U.S. Department of Energy’s document at this link (<https://docs.nrel.gov/docs/fy23osti/86210.pdf>), one of the ownership options for community solar projects is as follows: “The solar project and solar assets are wholly financed and owned by local individuals and entities.” Could a large community solar project wrap in individual owners as GOs?

If a generator operator enters into a generator interconnection agreement with a TOP and the TOP owns and operates the interconnection equipment, is the TOP performing Interconnection Operating Services for the generating Facility(ies)? If yes, then would this generator operator not be classified as a GOP pursuant to this definition?

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 comment.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Document Name

Comment

Constellation concurs with NAGF comments.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Marcus Bortman - APS - Arizona Public Service Co. - 6

Answer

Document Name

Comment

AZPS has no additional comments at this time.

Likes 0

Dislikes 0

Response

James Merlo - NAGF - NA - Not Applicable - NA - Not Applicable

Answer

Document Name

Comment

Again, the NAGF agrees with the list of standards listed in the proposed Implementation Plan. However, our concern is that the Implementation Plan for the eight Reliability Standard identified for Category 2 Compliance do not clearly identify exactly what RCs, BAs or TOPs need to do in order to communicate to the new Category 2 GOs and GOPs their Requirements as contained within some of the Standards identified. For example, under IRO-010 and TOP-003, it is unclear whether the RCs/BAs/TOPs are expected to provide their data specifications to the new Category 2 GOs and GOPs prior to the effective date of 5/16/2026?

Moreover, the new Category 2 GOs and GOPs will need some time to familiarize themselves with these Standards and their obligations related to the data specifications received as well as their obligations regarding gathering and sending this data to their respective RCs, BAs, and TOPs. We are also of the opinion that similar problems will be encountered with VAR-002. Again, it is unclear whether TOPs are required to provide the voltage schedules to Category 2 entities prior to 5/16/2026 to allow the owners of Category 2 IBRs the time to set up SCADA systems to follow the specified voltage schedules. If Category 2 GOs and GOPs are required to reach out to their RCs, BAs and TOPs prior to 5/16/2026, what are these RCs, Bas, and TOPs' obligations to respond to the requests in a timely manner, since there are no requirements spelled out in the proposed Implementation Plan? While we have only offered two examples of potential problems that need to be addressed, we do not support the approval of the Implementation Plan until all eight Reliability Standards identified are thoroughly reviewed by the drafting team(s) and further clarification and direction is included in the next version of this document.

The NAGF remains supportive of the inclusion of inverter-based resources (IBRs) on the Bulk-Power System (BPS) and their requirement to be registered NERC entities. We are aware of and support our member companies that are providing great details in their comments for different techniques, suggestions, and specific language on ways to ensure better coordination between these new NERC generation registrants and their ability to be compliant with existing and pending NERC standards, as well as not bringing undue compliance risks for existing BAs, TOPs, TPs, PCs, and RCs.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer

Document Name

Comment

Constellation concurs with NAGF comments.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Scott Thompson - TXNM Energy - 3

Answer

Document Name

Comment

As stated, a holistic approach to have applicable facilities listed which will provide clarity to which facilities fall under which requirement. For example TOP-003, R5 addresses GO/GOP however that requirement is built upon R2, R3, and R4 which do not include those facilities/entities. Further, It is not clear in NERC Standards (e.g. VAR-001/VAR-002) that require the TOP to communicate generator voltage or Reactive Power schedules (voltage schedules) to the GOP and how that would apply to Category 2 GOPs interconnected to the distribution system.

Further:

- we do not believe it has addressed the industry concern regarding separately defining the new entities as GO/GOP Category 2.
- The eight (8) Reliability Standards cited in the Implementation Plan for GO/GOP Category 2 were left unchanged and do not specifically identify this new "Category 2" group in the "Applicability" section of the Standards. It is much more clearly defined in the new Reliability Standards PRC-028-1, PRC-029-1 & PRC-030-1 which list "Facilities" in the "Applicability" section as "BES Inverter-Based Resources" and "Non-BES Inverter-Based Resources...".
- Concern with NERC setting the precedent of being able to change the scope of inclusion for NERC Reliability Standard "Applicability" simply by changing a definition in the NERC Glossary of Terms."

Likes 0

Dislikes 0

Response

Joshua Phillips - Southwest Power Pool, Inc. (RTO) - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)	
Answer	
Document Name	
Comment	
Testing of new generation resources that have not yet reached their commercial operation date (COD) has caused system reliability issues in certain regions. The use of COD as a threshold at which a resource owner and operator are required to register with NERC and be subject to NERC Reliability Standards creates a gap during which the resources are online and capable of impacting system reliability but are not subject to NERC Reliability Standards. During this gap period, resources are often owned and operated by entities other than the entities who will assume ownership of and operational responsibility for the resources once they reach their COD. While addressing this gap is beyond the scope of this project, NERC should continue reviewing whether the COD remains the appropriate threshold for resource owner and operator registration and should evaluate possible options for addressing this reliability gap.	
Likes 0	
Dislikes 0	
Response	
Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO Group	
Answer	
Document Name	2024-01_Unofficial_Comment_Form_GO GOP Definition Alignment NSRF final.docx
Comment	
The proposed approach creates difficulty in implementing outside of US jurisdiction. In Canada there are varying rules for implementing the NERC standards. In some jurisdictions these rely on the modification dates of standards and approval of modification to standards. If the scope is changed by a definition update, it can be unclear as to if this change is adopted at all and when the change becomes effective. This creates confusion both for entities determining which standards are applicable as well as Regional Entities in how to audit in these jurisdictions.	
Likes 1	Adam Burlock, N/A, Burlock Adam
Dislikes 0	
Response	
Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2	
Answer	
Document Name	
Comment	
ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.	
Likes 0	

Dislikes 0

Response

Alan Wahlstrom - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP

Answer

Document Name

Comment

SPP has collaborated with ISO/RTO Council Standards Review Committee (SRC) and support their comments

Likes 0

Dislikes 0

Response

Mason Jones - Mason Jones On Behalf of: Benjamin Hector, Northern California Power Agency, 4, 3, 5, 6; Jeremy Lawson, Northern California Power Agency, 4, 3, 5, 6; Marty Hostler, Northern California Power Agency, 4, 3, 5, 6; Michael Whitney, Northern California Power Agency, 4, 3, 5, 6; - Mason Jones

Answer

Document Name

Comment

The definitions are still not clear and the implementation plan is incomplete.

The SDT posted the request for comments related to the IBR-Industry definition SAR "Project 2024-01 Rules of Procedure Definition Alignment (GO and GOP) on August 16, 2024. The SDT refused to respond to Industry comments for over eight months and proposed rejecting the SAR even though 72% of industry supports parts of the SAR. It appears the SDT doesn't want to do the work requested. We suggest assigning it to another SDT that is capable to do the requested work.

The IBR-Industry definition SAR received about 72% support for parts of the SAR. That SAR is needed to clarify the proposed definitions. After the SDT sat on the IBR Industry definition SAR for eight months they decided to ignore industry favorable comments and refuse to clarify terms. In fact, this SDT proposes rejecting the SAR without original Industry commenters even being allowed to respond to their proposed rejection action.

Industry support can be seen in response to SAR comments questions 1, 3, and 4; we agree industry did not support items in question 2. MRO's proxy which represents 19 entities and 46 industry votes, and NPCC's proxy which represents 35 entities and 37 votes among numerous other individual entities support the Industry definition clarification SAR. Collectively about 56 entities with 112 votes supported the SAR while 21 entities representing 44 votes opposed it. Thus about 72% supported it.

These incomplete and unclear proposed definitions submitted by this SDT are not acceptable. It is clear based on the SDT ignoring industry and procrastinating with the Industry definition SAR that they don't want to do the work. Consequently, we recommend another SDT working on IBR standards be assigned to this project and the Industry supported IBR definition SAR to ensure clear definitions are provided and consistent in all IBR related standards.

Likes 0

Dislikes 0

Response

Consideration of Comments

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

Comments Received Summary

There were 29 sets of responses, including comments from approximately 104 different people from approximately 77 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, contact Manager of Standards Information, [Nasheema Santos](#) (via email) or at (404) 290-6796.

Consideration of Comments

The Project 2024-01 Drafting Team (DT) would like to thank all of industry for their time and comments. Due to the similar nature of multiple comments received during the comment period, the DT has chosen to respond to comments in summary format as provided for by section 4.2 of the Standard Processes Manual.

New Defined Terms

The DT received multiple comments specific to the industry need to define multiple terms to adequately identify various Distributed Energy Resources (DER).

Comments specific to Generator Owner and Generator Operator definitions have been addressed by the work completed by the Project 2024-01 DT by revising the Generator Owner and Generator Operator defined terms per the scope of the Generator Owner and Generator Operator Definition Alignment SAR.

The DT recommends the NERC Standards Committee reject the IBR Registration and Standards Applicability Glossary Update SAR, given the duplicative nature of the work already under consideration in Project 2022-02 Uniform Modeling Framework for IBR and Project 2020-06 Verifications of Models and Data for Generators DTs to address additional defined terms for DERs.

The IBR Registration and Standards Applicability Glossary Update SAR proposed the development or expansion of definitions as outlined below:

- **Sub-BES IBR Definition:** Develop a clear definition for Sub-BES IBRs (non-BES IBRs that meet registry criteria thresholds), ensuring there's certainty around which IBR facilities qualify. This could involve updates to the Glossary, Reliability Standards, or NERC's Rules of Procedure.

- **GO/GOP Definitions:** Revise the Glossary definitions for Generator Owners (GOs) and Generator Operators (GOPs) to include Sub-BES IBRs, ensuring no unintended expansion of standards applicability. A detailed implementation plan will be proposed to address any impact on existing standards.
- **Non-Material IBR and IBR-DER Definitions:** Develop definitions for Non-Material IBRs (BPS-connected IBRs not meeting the criteria) and IBR-DERs (distribution-connected IBRs), clarifying their applicability in standards. The goal is to ensure clarity on the classification of each type of IBR.

The proposed term Sub-BES IBR, the DT believes, is addressed with the terminology used in the revised GO and GOP definitions, specifically the Category 2 GO and Category 2 GOP. These definitions clarify that IBRs that meet the Category 2 registration criteria are what the SAR proposed to be defined by the Sub-BES IBR definition. In addition, Projects 2020-06 and 2022-02 are both looking to define DER resources for the purpose of NERC Standards. For these reasons, the 2024-01 DT believes the desired outcome of the IBR Registration and Standards Applicability Glossary Update SAR is already being completed by these other DTs and any efforts by this team would be duplicative of those teams.

The proposed Sub-BES IBR definition for Category 2 IBRs was not created by the DTs associated with Milestone 2 projects of order 901 standards due to the Applicability section of the PRC-028-1, PRC-029-1, and PRC-030-1 standards to specify what generation are applicable to the standards requirements. This approach to identifying the applicable generation for each standard is clear, consistent, and enforceable.

The development of any new or revised standards that will address *aggregated non-registered IBR* by the GO, the *aggregated IBR-DER* by the TO, are associated with Milestone 3 of 901 and are within the scope of project 2022-02 Uniform Modeling Framework for IBR DT. A definition of DER is currently being proposed in Project 2022-02 consistent with section 5.0 of the Standard Processes Manual.

Milestone 3 projects will address the scope of issues related to the current state of model quality. Industry is encouraged to engage with these active DTs to ensure the approach taken regarding identification of these generation types is clear, consistent, and enforceable.

- [Project 2020-06 Verifications of Models and Data for Generators](#)
- [Project 2021-01 – System Model Validation with IBRs](#)
- [Project 2022-02 – Uniform Framework Model Framework for IBR](#)

Reminder

Standards Announcement

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

Initial Ballots Open through May 7, 2025

Now Available

Initial ballots for the revised definitions of Generator Owner and Generator Operator for inclusion in the *Glossary of Terms used in NERC Reliability Standards* and the associated Implementation Plan are open through **8 p.m. Eastern, Wednesday, May 7, 2025**.

Reminder Regarding Corporate RBB Memberships

Under the NERC Rules of Procedure, each entity and its affiliates is collectively permitted one voting membership per Registered Ballot Body Segment. Each entity that undergoes a change in corporate structure (such as a merger or acquisition) that results in the entity or affiliated entities having more than the one permitted representative in a particular Segment must withdraw the duplicate membership(s) prior to joining new ballot pools or voting on anything as part of an existing ballot pool. Contact ballotadmin@nerc.net to assist with the removal of any duplicate registrations.

Balloting

Members of the ballot pools associated with this project can log in and submit their votes by accessing the Standards Balloting and Commenting System (SBS) [here](#).

- Contact NERC IT support directly at <https://support.nerc.net/> (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.
- Passwords expire every **6 months** and must be reset.
- The SBS **is not** supported for use on mobile devices.
- Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.

Next Steps

The ballot results will be announced and posted on the project page. The drafting team will review all responses received during the comment period and determine the next steps of the project.

For information on the Standards Development Process, refer to the [Standard Processes Manual](#).

For more information or assistance, contact Senior Standards Developer, [Jessica Harris](#) (via email) or at 404-710-4885. [Subscribe to this project's observer mailing list](#) by selecting "NERC Email Distribution Lists" from the "Service" drop-down menu and specify "Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) observer list" in the Description Box.



North American Electric Reliability Corporation
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Atlanta, GA 30326
404-446-2560 | www.nerc.com

Standards Announcement

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

Formal Comment Period Open through May 7, 2025
Ballot Pools Forming through April 22, 2025

[Now Available](#)

A 45-day formal comment period for **Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)** is open through **8 p.m. Eastern, Wednesday, May 7, 2025**.

Commenting

Use the [Standards Balloting and Commenting System \(SBS\)](#) to submit comments. An unofficial Word version of the comment form is posted on the [project page](#).

Reminder Regarding Corporate RBB Memberships

Under the NERC Rules of Procedure, each entity and its affiliates is collectively permitted one voting membership per Registered Ballot Body Segment. Each entity that undergoes a change in corporate structure (such as a merger or acquisition) that results in the entity or affiliated entities having more than the one permitted representative in a particular Segment must withdraw the duplicate membership(s) prior to joining new ballot pools or voting on anything as part of an existing ballot pool. Contact ballotadmin@nerc.net to assist with the removal of any duplicate registrations.

Ballot Pools

Ballot pools are being formed through **8 p.m. Eastern, Tuesday, April 22, 2025**. Registered Ballot Body members can join the ballot pools [here](#).

- Contact NERC IT support directly at <https://support.nerc.net/> (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.
- Passwords expire every **6 months** and must be reset.
- The SBS **is not** supported for use on mobile devices.
- Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.

Next Steps

Initial ballots for the revised definitions of Generator Owner and Generator Operator for inclusion in

the *Glossary of Terms used in NERC Reliability Standards* and the associated Implementation Plan will be conducted **April 28 – May 7, 2025**.

For information on the Standards Development Process, refer to the [Standard Processes Manual](#).

For more information or assistance, contact Senior Standards Developer, [Jessica Harris](#) (via email) or at 404-710-4885. [Subscribe to this project's observer mailing list](#) by selecting "NERC Email Distribution Lists" from the "Service" drop-down menu and specify "Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) observer list" in the Description Box.



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BALLOT RESULTS

Comment: [View Comment Results \(/CommentResults/Index/359\)](#)

Ballot Name: 2024-01 Rules of Procedure Definitions Alignment (GO and GOP) | Draft 1 GO and GOP Definitions IN 1 DEF

Voting Start Date: 4/28/2025 12:01:00 AM

Voting End Date: 5/7/2025 8:00:00 PM

Ballot Type: DEF

Ballot Activity: IN

Ballot Series: 1

Total # Votes: 240

Total Ballot Pool: 267

Quorum: 89.89

Quorum Established Date: 5/7/2025 2:34:49 PM

Weighted Segment Value: 86.48

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 1	67	1	46	0.92	4	0.08	0	8	9
Segment: 2	6	0.6	6	0.6	0	0	0	0	0
Segment: 3	62	1	49	0.907	5	0.093	0	5	3
Segment: 4	14	1	10	0.714	4	0.286	0	0	0
Segment: 5	68	1	45	0.833	9	0.167	0	5	9
Segment: 6	44	1	28	0.8	7	0.2	0	3	6
Segment: 7	0	0	0	0	0	0	0	0	0
Segment: 8	0	0	0	0	0	0	0	0	0

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 9	0	0	0	0	0	0	0	0	0
Segment: 10	6	0.5	5	0.5	0	0	0	1	0
Totals:	267	6.1	189	5.275	29	0.825	0	22	27

BALLOT POOL MEMBERS

Show entries

Search:

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	AEP - AEP Service Corporation	Dennis Sauriol		Affirmative	N/A
1	Allete - Minnesota Power, Inc.	Hillary Creurer		Abstain	N/A
1	Ameren - Ameren Services	Tamara Evey		None	N/A
1	American Transmission Company, LLC	Amy Wilke		None	N/A
1	APS - Arizona Public Service Co.	Daniela Atanasovski		Negative	Comments Submitted
1	Associated Electric Cooperative, Inc.	Mark Riley		Affirmative	N/A
1	Avista - Avista Corporation	Mike Magruder		Affirmative	N/A
1	Balancing Authority of Northern California	Kris Kirkegaard	Tim Kelley	Affirmative	N/A
1	BC Hydro and Power Authority	Adrian Andreoiu		Abstain	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Berkshire Hathaway Energy - MidAmerican Energy Co.	Thomas Breen		Affirmative	N/A
1	Black Hills Corporation	Trevor Rombough		Affirmative	N/A
1	CenterPoint Energy Houston Electric, LLC	Daniela Hammons		Affirmative	N/A
1	Central Iowa Power Cooperative	Kevin Lyons		Affirmative	N/A
1	City Utilities of Springfield, Missouri	Michael Bowman		None	N/A
1	Colorado Springs Utilities	Corey Walker		Affirmative	N/A
1	Con Ed - Consolidated Edison Co. of New York	Dermot Smyth		Affirmative	N/A
1	Dairyland Power Cooperative	Karrie Schuldt		Affirmative	N/A
1	Dominion - Dominion Virginia Power	Steven Belle		Affirmative	N/A
1	Duke Energy	Katherine Street		Affirmative	N/A
1	Edison International - Southern California Edison Company	Robert Blackney		Affirmative	N/A
1	Entergy	Brian Lindsey		None	N/A
1	Evergy	Kevin Frick	Alan Kloster	Affirmative	N/A
1	Exelon	Daniel Gacek		Affirmative	N/A
1	FirstEnergy - FirstEnergy Corporation	Theresa Ciancio		Affirmative	N/A
1	Georgia Transmission Corporation	Greg Davis		Affirmative	N/A
1	Glencoe Light and Power Commission	Terry Volkmann		None	N/A
1	Great River Energy	Gordon Pietsch		None	N/A
1	Hydro-Quebec (HQ)	Nicolas Turcotte	Chantal Mazza	Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	IDACORP - Idaho Power Company	Sean Steffensen		None	N/A
1	Imperial Irrigation District	Jesus Sammy Alcaraz	Denise Sanchez	Affirmative	N/A
1	International Transmission Company Holdings Corporation	Michael Moltane	Allie Gavin	Abstain	N/A
1	JEA	Joseph McClung		Affirmative	N/A
1	Lincoln Electric System	Josh Johnson		Affirmative	N/A
1	Long Island Power Authority	Isidoro Behar		Abstain	N/A
1	Lower Colorado River Authority	Matt Lewis		Abstain	N/A
1	M and A Electric Power Cooperative	William Price		Affirmative	N/A
1	Manitoba Hydro	Nazra Gladu		Affirmative	N/A
1	Minnkota Power Cooperative Inc.	Theresa Allard	Nikki Carson-Marquis	Affirmative	N/A
1	Muscatine Power and Water	Andrew Kurriger		Affirmative	N/A
1	N.W. Electric Power Cooperative, Inc.	Mark Ramsey		Affirmative	N/A
1	National Grid USA	Jacqueline Ryan		Abstain	N/A
1	Nebraska Public Power District	Jamison Cawley		Affirmative	N/A
1	New York Power Authority	Daniel Valle		Affirmative	N/A
1	NextEra Energy - Florida Power and Light Co.	Silvia Mitchell		Affirmative	N/A
1	NiSource - Northern Indiana Public Service Co.	Alison Nickells		Affirmative	N/A
1	Northeast Missouri Electric Power Cooperative	Brett Douglas		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	OGE Energy - Oklahoma Gas and Electric Co.	Terri Pyle		Affirmative	N/A
1	Pedernales Electric Cooperative, Inc.	Bradley Collard		None	N/A
1	Platte River Power Authority	Marissa Archie		Affirmative	N/A
1	Portland General Electric Co.	Brooke Jockin		None	N/A
1	PPL Electric Utilities Corporation	Michelle McCartney Longo		Affirmative	N/A
1	Public Utility District No. 1 of Snohomish County	Alyssia Rhoads		Negative	Comments Submitted
1	Public Utility District No. 2 of Grant County, Washington	Joanne Anderson		Abstain	N/A
1	Sacramento Municipal Utility District	Wei Shao	Tim Kelley	Affirmative	N/A
1	Salt River Project	Laura Somak		Affirmative	N/A
1	Santee Cooper	Chris Wagner		Affirmative	N/A
1	Sempra - San Diego Gas and Electric	Mohamed Derbas		Affirmative	N/A
1	Southern Company - Southern Company Services, Inc.	Matt Carden		Affirmative	N/A
1	Sunflower Electric Power Corporation	Paul Mehlhaff		Abstain	N/A
1	Tacoma Public Utilities (Tacoma, WA)	John Merrell	Jennie Wike	Affirmative	N/A
1	Tennessee Valley Authority	David Plumb		Negative	Comments Submitted
1	Tri-State G and T Association, Inc.	Donna Wood		Affirmative	N/A
1	TXNM Energy	Ivy Goldstein		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	U.S. Bureau of Reclamation	Richard Jackson		Negative	Comments Submitted
1	Unisource - Tucson Electric Power Co.	Jessica Cordero		Affirmative	N/A
1	Western Area Power Administration	Ben Hammer		Affirmative	N/A
1	Xcel Energy, Inc.	Eric Barry		Affirmative	N/A
2	Electric Reliability Council of Texas, Inc.	Kennedy Meier		Affirmative	N/A
2	ISO New England, Inc.	John Pearson		Affirmative	N/A
2	Midcontinent ISO, Inc.	Kirsten Rowley		Affirmative	N/A
2	New York Independent System Operator	Gregory Campoli		Affirmative	N/A
2	PJM Interconnection, L.L.C.	Thomas Foster	Elizabeth Davis	Affirmative	N/A
2	Southwest Power Pool, Inc. (RTO)	Joshua Phillips		Affirmative	N/A
3	AEP	Jodi Yeary		Affirmative	N/A
3	AES - Indianapolis Power and Light Co.	Sing Tay		Affirmative	N/A
3	Ameren - Ameren Services	David Jendras Sr	Nick Leathers	Affirmative	N/A
3	APS - Arizona Public Service Co.	Jessica Lopez		Negative	Comments Submitted
3	Associated Electric Cooperative, Inc.	Todd Bennett		Affirmative	N/A
3	Austin Energy	Lovita Griffin		Affirmative	N/A
3	Avista - Avista Corporation	Robert Follini		Affirmative	N/A
3	BC Hydro and Power Authority	Ming Jiang		Abstain	N/A
3	Berkshire Hathaway Energy - MidAmerican Energy Co.	Amy Key		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	Black Hills Corporation	Josh Combs		Affirmative	N/A
3	Bonneville Power Administration	Ron Sporseen		Affirmative	N/A
3	CMS Energy - Consumers Energy Company	Karl Blaszkowski		Affirmative	N/A
3	Colorado Springs Utilities	Hillary Dobson		Affirmative	N/A
3	Con Ed - Consolidated Edison Co. of New York	Erin Doane		Affirmative	N/A
3	Dominion - Dominion Virginia Power	Victoria Crider		Affirmative	N/A
3	DTE Energy - Detroit Edison Company	Marvin Johnson		Affirmative	N/A
3	Edison International - Southern California Edison Company	Romel Aquino		Affirmative	N/A
3	Entergy	James Keele		None	N/A
3	Evergy	Marcus Moor	Alan Kloster	Affirmative	N/A
3	Eversource Energy	Vicki O'Leary		Abstain	N/A
3	Exelon	Kinte Whitehead		Affirmative	N/A
3	FirstEnergy - FirstEnergy Corporation	Aaron Ghodooshim		Affirmative	N/A
3	Georgia System Operations Corporation	Scott McGough		Affirmative	N/A
3	Great River Energy	Michael Brytowski		Affirmative	N/A
3	Imperial Irrigation District	George Kirschner	Denise Sanchez	Affirmative	N/A
3	JEA	Marilyn Williams		Affirmative	N/A
3	KAMO Electric Cooperative	Tony Gott		Affirmative	N/A
3	Lincoln Electric System	Sam Christensen		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	Los Angeles Department of Water and Power	Fausto Serratos		Abstain	N/A
3	M and A Electric Power Cooperative	Gary Dollins		Affirmative	N/A
3	Manitoba Hydro	Mike Smith		Affirmative	N/A
3	MGE Energy - Madison Gas and Electric Co.	Benjamin Widder		Affirmative	N/A
3	Muscatine Power and Water	Seth Shoemaker		Affirmative	N/A
3	National Grid USA	Brian Shanahan		None	N/A
3	Nebraska Public Power District	Tony Eddleman		Affirmative	N/A
3	New York Power Authority	Richard Machado		Affirmative	N/A
3	NextEra Energy - Florida Power and Light Co.	Karen Demos		Affirmative	N/A
3	NiSource - Northern Indiana Public Service Co.	Steven Taddeucci		Affirmative	N/A
3	North Carolina Electric Membership Corporation	Tyler Bellomy	Scott Brame	Affirmative	N/A
3	Northeast Missouri Electric Power Cooperative	Skyler Wiegmann		Affirmative	N/A
3	Northern California Power Agency	Michael Whitney	Mason Jones	Negative	Comments Submitted
3	NW Electric Power Cooperative, Inc.	Heath Henry		Affirmative	N/A
3	OGE Energy - Oklahoma Gas and Electric Co.	Donald Hargrove		Affirmative	N/A
3	Omaha Public Power District	David Heins		None	N/A
3	Platte River Power Authority	Richard Kiess		Affirmative	N/A
3	Portland General Electric Co.	Mayra Franco		Abstain	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	PPL - Louisville Gas and Electric Co.	James Frank		Affirmative	N/A
3	Sacramento Municipal Utility District	Nicole Looney	Tim Kelley	Affirmative	N/A
3	Salt River Project	Mathew Weber		Affirmative	N/A
3	Santee Cooper	Vicky Budreau		Affirmative	N/A
3	Seminole Electric Cooperative, Inc.	Usama Tahir		Negative	Comments Submitted
3	Sempra - San Diego Gas and Electric	Bryan Bennett		Affirmative	N/A
3	Sho-Me Power Electric Cooperative	Jarrod Murdaugh		Affirmative	N/A
3	Snohomish County PUD No. 1	Holly Chaney		Negative	Third-Party Comments
3	Southern Company - Alabama Power Company	Joel Dembowski		Affirmative	N/A
3	Southern Indiana Gas and Electric Co.	Ryan Snyder		Affirmative	N/A
3	Tacoma Public Utilities (Tacoma, WA)	John Nierenberg	Jennie Wike	Affirmative	N/A
3	Tennessee Valley Authority	Ian Grant		Negative	Comments Submitted
3	Tri-State G and T Association, Inc.	Amanda Skubal		Affirmative	N/A
3	TXNM Energy	Scott Thompson		Affirmative	N/A
3	WEC Energy Group, Inc.	Christine Kane		Affirmative	N/A
3	Xcel Energy, Inc.	Nicholas Friebel	Joseph Gatten	Abstain	N/A
4	Austin Energy	Tony Hua		Affirmative	N/A
4	City Utilities of Springfield, Missouri	Jerry Bradshaw		Negative	Third-Party Comments
4	CMS Energy - Consumers Energy Company	Aric Root		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
4	FirstEnergy - FirstEnergy Corporation	Mark Garza		Affirmative	N/A
4	Georgia System Operations Corporation	Katrina Lyons		Affirmative	N/A
4	MGE Energy - Madison Gas and Electric Co.	Ray Mangiulli		Affirmative	N/A
4	North Carolina Electric Membership Corporation	Richard McCall	Scott Brame	Affirmative	N/A
4	Northern California Power Agency	Marty Hostler	Mason Jones	Negative	Comments Submitted
4	Public Utility District No. 1 of Snohomish County	John D. Martinsen		Negative	Comments Submitted
4	Sacramento Municipal Utility District	Foung Mua	Tim Kelley	Affirmative	N/A
4	Tacoma Public Utilities (Tacoma, WA)	Hien Ho	Jennie Wike	Affirmative	N/A
4	Utility Services, Inc.	Carver Powers		Affirmative	N/A
4	WEC Energy Group, Inc.	Candace Morakinyo		Affirmative	N/A
4	Western Power Pool	Kevin Conway		Negative	Comments Submitted
5	AEP	Thomas Foltz		Affirmative	N/A
5	AES - AES Corporation	Ruchi Shah		Affirmative	N/A
5	Ameren - Ameren Missouri	Sam Dwyer		Affirmative	N/A
5	American Municipal Power	Amy Ritts		Affirmative	N/A
5	APS - Arizona Public Service Co.	Andrew Smith		Negative	Comments Submitted
5	Austin Energy	Michael Dillard		Affirmative	N/A
5	BC Hydro and Power Authority	Vijay Raghunathan		Abstain	N/A
5	Berkshire Hathaway - NV Energy	Dwanique Spiller		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Black Hills Corporation	Sheila Suurmeier		Affirmative	N/A
5	Bonneville Power Administration	Milli Chennell		Affirmative	N/A
5	Calpine Corporation	Whitney Wallace		Affirmative	N/A
5	Choctaw Generation Limited Partnership, LLLP	Rob Watson		Affirmative	N/A
5	CMS Energy - Consumers Energy Company	David Greyerbiehl		Affirmative	N/A
5	Colorado Springs Utilities	Jeffrey Icke		None	N/A
5	Con Ed - Consolidated Edison Co. of New York	Michelle Pagano		Affirmative	N/A
5	Constellation	Alison MacKellar		Negative	Comments Submitted
5	Dairyland Power Cooperative	Tommy Drea		Affirmative	N/A
5	Dominion - Dominion Resources, Inc.	Barbara Marion		Affirmative	N/A
5	DTE Energy - Detroit Edison Company	Mohamad Elhusseini		Affirmative	N/A
5	Duke Energy	Dale Goodwine		Affirmative	N/A
5	EDF Renewable Energy	Steven Sconce		Affirmative	N/A
5	Edison International - Southern California Edison Company	Selene Willis		Affirmative	N/A
5	Entergy - Entergy Services, Inc.	Gail Golden		None	N/A
5	Evergy	Jeremy Harris	Alan Kloster	Affirmative	N/A
5	FirstEnergy - FirstEnergy Corporation	Matthew Augustin		Affirmative	N/A
5	Greybeard Compliance Services, LLC	Mike Gabriel		None	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Grid Strategies LLC	Michael Goggin		Negative	Comments Submitted
5	Hydro-Quebec (HQ)	Junji Yamaguchi	Chantal Mazza	Affirmative	N/A
5	Imperial Irrigation District	Tino Zaragoza	Denise Sanchez	Affirmative	N/A
5	Invenergy LLC	Rhonda Jones		None	N/A
5	JEA	John Babik		Affirmative	N/A
5	Leeward Renewable Energy	Rob Robertson		None	N/A
5	Lincoln Electric System	Brittany Millard		Affirmative	N/A
5	Lower Colorado River Authority	Joseph Scott		Abstain	N/A
5	Manitoba Hydro	Kristy-Lee Young		Affirmative	N/A
5	Muscatine Power and Water	Chance Back		Affirmative	N/A
5	National Grid USA	Robin Berry		None	N/A
5	NB Power Corporation - New Brunswick Power Transmission Corporation	David Melanson		Abstain	N/A
5	Nebraska Public Power District	Ronald Bender		Affirmative	N/A
5	New York Power Authority	Zahid Qayyum		Affirmative	N/A
5	NextEra Energy	Richard Vendetti		Affirmative	N/A
5	NiSource - Northern Indiana Public Service Co.	Kathryn Tackett		Affirmative	N/A
5	North Carolina Electric Membership Corporation	Reid Cashion	Scott Brame	Affirmative	N/A
5	Northern California Power Agency	Jeremy Lawson	Mason Jones	Negative	Comments Submitted
5	OGE Energy - Oklahoma Gas and Electric Co.	Patrick Wells		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Oglethorpe Power Corporation	Donna Johnson		Affirmative	N/A
5	Oklahoma Municipal Power Authority	Patrick Tuttle		Affirmative	N/A
5	Omaha Public Power District	Kayleigh Wilkerson		None	N/A
5	Orsted Americas	Keith Smith		None	N/A
5	Pacific Gas and Electric Company	Tyler Brun	Bob Cardle	Affirmative	N/A
5	Platte River Power Authority	Jon Osell	Jennifer Sieg	Affirmative	N/A
5	Portland General Electric Co.	Ryan Olson		Abstain	N/A
5	PPL - Louisville Gas and Electric Co.	Julie Hostrander		Affirmative	N/A
5	Public Utility District No. 1 of Snohomish County	Becky Burden		Negative	Comments Submitted
5	Sacramento Municipal Utility District	Ryder Couch	Tim Kelley	Affirmative	N/A
5	Salt River Project	Matthew Jaramilla		Affirmative	N/A
5	Santee Cooper	Carey Salisbury		Affirmative	N/A
5	Seminole Electric Cooperative, Inc.	Melanie Wong		Negative	Comments Submitted
5	Sempra - San Diego Gas and Electric	Jennifer Wright		Affirmative	N/A
5	Southern Company - Southern Company Generation	Leslie Burke		Affirmative	N/A
5	Southern Indiana Gas and Electric Co.	Larry Rogers		Affirmative	N/A
5	Tallahassee Electric (City of Tallahassee, FL)	Karen Weaver		Abstain	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Tennessee Valley Authority	Darren Boehm		Negative	Comments Submitted
5	TransAlta Corporation	Ashley Scheelar		Negative	Comments Submitted
5	Tri-State G and T Association, Inc.	Sergio Banuelos		None	N/A
5	U.S. Bureau of Reclamation	Wendy Kalidass		Negative	Comments Submitted
5	WEC Energy Group, Inc.	Michelle Hribar		Affirmative	N/A
5	Xcel Energy, Inc.	Gerry Huitt		Affirmative	N/A
6	AEP	Randy Calhoun		Affirmative	N/A
6	Ameren - Ameren Services	Robert Quinlivan		Affirmative	N/A
6	APS - Arizona Public Service Co.	Marcus Bortman		Negative	Comments Submitted
6	Associated Electric Cooperative, Inc.	Brian Ackermann		Affirmative	N/A
6	Austin Energy	Imane Mrini		None	N/A
6	Berkshire Hathaway - PacifiCorp	Lindsay Wickizer		None	N/A
6	Black Hills Corporation	Josh Schumacher		Affirmative	N/A
6	Bonneville Power Administration	Tanner Brier		Affirmative	N/A
6	Cleco Corporation	Robert Hirschak		Negative	Third-Party Comments
6	Con Ed - Consolidated Edison Co. of New York	Jason Chandler		Affirmative	N/A
6	Constellation	Kimberly Turco		Negative	Comments Submitted
6	Dominion - Dominion Resources, Inc.	Sean Bodkin		Affirmative	N/A
6	Duke Energy	John Sturgeon		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
6	Edison International - Southern California Edison Company	Stephanie Kenny		Affirmative	N/A
6	Entergy	Julie Hall		None	N/A
6	Evergy	Tiffany Lake	Alan Kloster	Affirmative	N/A
6	FirstEnergy - FirstEnergy Corporation	Stacey Sheehan		Affirmative	N/A
6	Imperial Irrigation District	Diana Torres	Denise Sanchez	Affirmative	N/A
6	Invenergy LLC	Colin Chilcoat		Affirmative	N/A
6	Los Angeles Department of Water and Power	Anton Vu		Abstain	N/A
6	Manitoba Hydro	Brandin Stoesz		None	N/A
6	Muscatine Power and Water	Nicholas Burns		Affirmative	N/A
6	New York Power Authority	Shelly Dineen		Affirmative	N/A
6	NextEra Energy - Florida Power and Light Co.	Justin Welty		Affirmative	N/A
6	NiSource - Northern Indiana Public Service Co.	Eugene Johnson		Affirmative	N/A
6	Northern California Power Agency	Benjamin Hector	Mason Jones	Negative	Comments Submitted
6	OGE Energy - Oklahoma Gas and Electric Co.	Ashley F Stringer		Affirmative	N/A
6	Omaha Public Power District	Shonda McCain		Affirmative	N/A
6	Platte River Power Authority	Sabrina Martz		None	N/A
6	Portland General Electric Co.	Stefanie Burke		Abstain	N/A
6	Powerex Corporation	Raj Hundal		Abstain	N/A
6	PPL - Louisville Gas and Electric Co.	Linn Oelker		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
6	Sacramento Municipal Utility District	Charles Norton	Tim Kelley	Affirmative	N/A
6	Salt River Project	Timothy Singh		Affirmative	N/A
6	Santee Cooper	Marty Watson		Affirmative	N/A
6	Seminole Electric Cooperative, Inc.	Bret Galbraith		Negative	Comments Submitted
6	Snohomish County PUD No. 1	John Liang		Negative	Third-Party Comments
6	Southern Company - Southern Company Generation and Energy Marketing	Matthew O'neal		Affirmative	N/A
6	Southern Indiana Gas and Electric Co.	Kati Barr		Affirmative	N/A
6	Tacoma Public Utilities (Tacoma, WA)	Terry Gifford	Jennie Wike	Affirmative	N/A
6	Tennessee Valley Authority	Jeffrey Powell		Negative	Comments Submitted
6	WEC Energy Group, Inc.	David Boeshaar		Affirmative	N/A
6	Western Area Power Administration	Jennifer Neville		Affirmative	N/A
6	Xcel Energy, Inc.	Patrick Flaherty		None	N/A
10	Midwest Reliability Organization	Mark Flanary		Affirmative	N/A
10	Northeast Power Coordinating Council	Ruida Shu		Abstain	N/A
10	ReliabilityFirst	Tremayne Brown	Greg Sorenson	Affirmative	N/A
10	SERC Reliability Corporation	Dave Krueger		Affirmative	N/A
10	Texas Reliability Entity, Inc.	Rachel Coyne		Affirmative	N/A
10	Western Electricity Coordinating Council	Steven Rueckert		Affirmative	N/A

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BALLOT RESULTS

Comment: [View Comment Results \(/CommentResults/Index/359\)](#)

Ballot Name: 2024-01 Rules of Procedure Definitions Alignment (GO and GOP) | Draft 1 GO and GOP Definitions | Implementation Plan IN 1 OT

Voting Start Date: 4/28/2025 12:01:00 AM

Voting End Date: 5/7/2025 8:00:00 PM

Ballot Type: OT

Ballot Activity: IN

Ballot Series: 1

Total # Votes: 242

Total Ballot Pool: 267

Quorum: 90.64

Quorum Established Date: 5/7/2025 1:58:59 PM

Weighted Segment Value: 70.36

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 1	67	1	39	0.765	12	0.235	0	8	8
Segment: 2	6	0.6	2	0.2	4	0.4	0	0	0
Segment: 3	62	1	42	0.764	13	0.236	0	5	2
Segment: 4	14	1	10	0.714	4	0.286	0	0	0
Segment: 5	68	1	36	0.692	16	0.308	0	7	9
Segment: 6	44	1	23	0.657	12	0.343	0	3	6
Segment: 7	0	0	0	0	0	0	0	0	0
Segment: 8	0	0	0	0	0	0	0	0	0

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 9	0	0	0	0	0	0	0	0	0
Segment: 10	6	0.5	5	0.5	0	0	0	1	0
Totals:	267	6.1	157	4.292	61	1.808	0	24	25

BALLOT POOL MEMBERS

Show entries

Search:

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	AEP - AEP Service Corporation	Dennis Sauriol		Affirmative	N/A
1	Allele - Minnesota Power, Inc.	Hillary Creurer		Abstain	N/A
1	Ameren - Ameren Services	Tamara Evey		None	N/A
1	American Transmission Company, LLC	Amy Wilke		None	N/A
1	APS - Arizona Public Service Co.	Daniela Atanasovski		Negative	Comments Submitted
1	Associated Electric Cooperative, Inc.	Mark Riley		Affirmative	N/A
1	Avista - Avista Corporation	Mike Magruder		Affirmative	N/A
1	Balancing Authority of Northern California	Kris Kirkegaard	Tim Kelley	Affirmative	N/A
1	BC Hydro and Power Authority	Adrian Andreoiu		Abstain	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Berkshire Hathaway Energy - MidAmerican Energy Co.	Thomas Breen		Affirmative	N/A
1	Black Hills Corporation	Trevor Rombough		Negative	Comments Submitted
1	CenterPoint Energy Houston Electric, LLC	Daniela Hammons		Affirmative	N/A
1	Central Iowa Power Cooperative	Kevin Lyons		Affirmative	N/A
1	City Utilities of Springfield, Missouri	Michael Bowman		None	N/A
1	Colorado Springs Utilities	Corey Walker		Affirmative	N/A
1	Con Ed - Consolidated Edison Co. of New York	Dermot Smyth		Affirmative	N/A
1	Dairyland Power Cooperative	Karrie Schuldt		Affirmative	N/A
1	Dominion - Dominion Virginia Power	Steven Belle		Affirmative	N/A
1	Duke Energy	Katherine Street		Negative	Third-Party Comments
1	Edison International - Southern California Edison Company	Robert Blackney		Affirmative	N/A
1	Entergy	Brian Lindsey		None	N/A
1	Evergy	Kevin Frick	Alan Kloster	Affirmative	N/A
1	Exelon	Daniel Gacek		Affirmative	N/A
1	FirstEnergy - FirstEnergy Corporation	Theresa Ciancio		Affirmative	N/A
1	Georgia Transmission Corporation	Greg Davis		Affirmative	N/A
1	Glencoe Light and Power Commission	Terry Volkmann		Affirmative	N/A
1	Great River Energy	Gordon Pietsch		None	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Hydro-Quebec (HQ)	Nicolas Turcotte	Chantal Mazza	Affirmative	N/A
1	IDACORP - Idaho Power Company	Sean Steffensen		None	N/A
1	Imperial Irrigation District	Jesus Sammy Alcaraz	Denise Sanchez	Affirmative	N/A
1	International Transmission Company Holdings Corporation	Michael Moltane	Allie Gavin	Abstain	N/A
1	JEA	Joseph McClung		Affirmative	N/A
1	Lincoln Electric System	Josh Johnson		Affirmative	N/A
1	Long Island Power Authority	Isidoro Behar		Abstain	N/A
1	Lower Colorado River Authority	Matt Lewis		Abstain	N/A
1	M and A Electric Power Cooperative	William Price		Affirmative	N/A
1	Manitoba Hydro	Nazra Gladu		Negative	Comments Submitted
1	Minnkota Power Cooperative Inc.	Theresa Allard	Nikki Carson-Marquis	Negative	Third-Party Comments
1	Muscatine Power and Water	Andrew Kurriger		Affirmative	N/A
1	N.W. Electric Power Cooperative, Inc.	Mark Ramsey		Affirmative	N/A
1	National Grid USA	Jacqueline Ryan		Abstain	N/A
1	Nebraska Public Power District	Jamison Cawley		Affirmative	N/A
1	New York Power Authority	Daniel Valle		Negative	Comments Submitted
1	NextEra Energy - Florida Power and Light Co.	Silvia Mitchell		Negative	Comments Submitted

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	NiSource - Northern Indiana Public Service Co.	Alison Nickells		Affirmative	N/A
1	Northeast Missouri Electric Power Cooperative	Brett Douglas		Affirmative	N/A
1	OGE Energy - Oklahoma Gas and Electric Co.	Terri Pyle		Affirmative	N/A
1	Pedernales Electric Cooperative, Inc.	Bradley Collard		None	N/A
1	Platte River Power Authority	Marissa Archie		Affirmative	N/A
1	Portland General Electric Co.	Brooke Jockin		None	N/A
1	PPL Electric Utilities Corporation	Michelle McCartney Longo		Affirmative	N/A
1	Public Utility District No. 1 of Snohomish County	Alyssia Rhoads		Negative	Comments Submitted
1	Public Utility District No. 2 of Grant County, Washington	Joanne Anderson		Abstain	N/A
1	Sacramento Municipal Utility District	Wei Shao	Tim Kelley	Affirmative	N/A
1	Salt River Project	Laura Somak		Affirmative	N/A
1	Santee Cooper	Chris Wagner		Affirmative	N/A
1	Sempra - San Diego Gas and Electric	Mohamed Derbas		Affirmative	N/A
1	Southern Company - Southern Company Services, Inc.	Matt Carden		Negative	Comments Submitted
1	Sunflower Electric Power Corporation	Paul Mehlhaff		Abstain	N/A
1	Tacoma Public Utilities (Tacoma, WA)	John Merrell	Jennie Wike	Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Tennessee Valley Authority	David Plumb		Negative	Comments Submitted
1	Tri-State G and T Association, Inc.	Donna Wood		Affirmative	N/A
1	TXNM Energy	Lynn Goldstein		Negative	Comments Submitted
1	U.S. Bureau of Reclamation	Richard Jackson		Negative	Comments Submitted
1	Unisource - Tucson Electric Power Co.	Jessica Cordero		Affirmative	N/A
1	Western Area Power Administration	Ben Hammer		Affirmative	N/A
1	Xcel Energy, Inc.	Eric Barry		Affirmative	N/A
2	Electric Reliability Council of Texas, Inc.	Kennedy Meier		Negative	Comments Submitted
2	ISO New England, Inc.	John Pearson		Affirmative	N/A
2	Midcontinent ISO, Inc.	Kirsten Rowley		Negative	Third-Party Comments
2	New York Independent System Operator	Gregory Campoli		Affirmative	N/A
2	PJM Interconnection, L.L.C.	Thomas Foster	Elizabeth Davis	Negative	Third-Party Comments
2	Southwest Power Pool, Inc. (RTO)	Joshua Phillips		Negative	Comments Submitted
3	AEP	Jodi Yeary		Affirmative	N/A
3	AES - Indianapolis Power and Light Co.	Sing Tay		Negative	Comments Submitted
3	Ameren - Ameren Services	David Jendras Sr	Nick Leathers	Affirmative	N/A
3	APS - Arizona Public Service Co.	Jessica Lopez		Negative	Comments Submitted
3	Associated Electric Cooperative, Inc.	Todd Bennett		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	Austin Energy	Lovita Griffin		Affirmative	N/A
3	Avista - Avista Corporation	Robert Follini		Affirmative	N/A
3	BC Hydro and Power Authority	Ming Jiang		Abstain	N/A
3	Berkshire Hathaway Energy - MidAmerican Energy Co.	Amy Key		Affirmative	N/A
3	Black Hills Corporation	Josh Combs		Negative	Comments Submitted
3	Bonneville Power Administration	Ron Sporseen		Affirmative	N/A
3	CMS Energy - Consumers Energy Company	Karl Blaszkowski		Affirmative	N/A
3	Colorado Springs Utilities	Hillary Dobson		Affirmative	N/A
3	Con Ed - Consolidated Edison Co. of New York	Erin Doane		Affirmative	N/A
3	Dominion - Dominion Virginia Power	Victoria Crider		Affirmative	N/A
3	DTE Energy - Detroit Edison Company	Marvin Johnson		Negative	Comments Submitted
3	Edison International - Southern California Edison Company	Romel Aquino		Affirmative	N/A
3	Entergy	James Keele		None	N/A
3	Evergy	Marcus Moor	Alan Kloster	Affirmative	N/A
3	Eversource Energy	Vicki O'Leary		Abstain	N/A
3	Exelon	Kinte Whitehead		Affirmative	N/A
3	FirstEnergy - FirstEnergy Corporation	Aaron Ghodooshim		Affirmative	N/A
3	Georgia System Operations Corporation	Scott McGough		Affirmative	N/A
3	Great River Energy	Michael Brytowski		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	Imperial Irrigation District	George Kirschner	Denise Sanchez	Affirmative	N/A
3	JEA	Marilyn Williams		Affirmative	N/A
3	KAMO Electric Cooperative	Tony Gott		Affirmative	N/A
3	Lincoln Electric System	Sam Christensen		Affirmative	N/A
3	Los Angeles Department of Water and Power	Fausto Serratos		Abstain	N/A
3	M and A Electric Power Cooperative	Gary Dollins		Affirmative	N/A
3	Manitoba Hydro	Mike Smith		Negative	Comments Submitted
3	MGE Energy - Madison Gas and Electric Co.	Benjamin Widder		Affirmative	N/A
3	Muscatine Power and Water	Seth Shoemaker		Affirmative	N/A
3	National Grid USA	Brian Shanahan		None	N/A
3	Nebraska Public Power District	Tony Eddleman		Affirmative	N/A
3	New York Power Authority	Richard Machado		Negative	Comments Submitted
3	NextEra Energy - Florida Power and Light Co.	Karen Demos		Negative	Comments Submitted
3	NiSource - Northern Indiana Public Service Co.	Steven Taddeucci		Affirmative	N/A
3	North Carolina Electric Membership Corporation	Tyler Bellomy	Scott Brame	Affirmative	N/A
3	Northeast Missouri Electric Power Cooperative	Skyler Wiegmann		Affirmative	N/A
3	Northern California Power Agency	Michael Whitney	Mason Jones	Negative	Comments Submitted
3	NW Electric Power Cooperative, Inc.	Heath Henry		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	OGE Energy - Oklahoma Gas and Electric Co.	Donald Hargrove		Affirmative	N/A
3	Omaha Public Power District	David Heins		Affirmative	N/A
3	Platte River Power Authority	Richard Kiess		Affirmative	N/A
3	Portland General Electric Co.	Mayra Franco		Abstain	N/A
3	PPL - Louisville Gas and Electric Co.	James Frank		Affirmative	N/A
3	Sacramento Municipal Utility District	Nicole Looney	Tim Kelley	Affirmative	N/A
3	Salt River Project	Mathew Weber		Affirmative	N/A
3	Santee Cooper	Vicky Budreau		Affirmative	N/A
3	Seminole Electric Cooperative, Inc.	Usama Tahir		Negative	Comments Submitted
3	Sempra - San Diego Gas and Electric	Bryan Bennett		Affirmative	N/A
3	Sho-Me Power Electric Cooperative	Jarrod Murdaugh		Affirmative	N/A
3	Snohomish County PUD No. 1	Holly Chaney		Negative	Third-Party Comments
3	Southern Company - Alabama Power Company	Joel Dembowski		Negative	Comments Submitted
3	Southern Indiana Gas and Electric Co.	Ryan Snyder		Affirmative	N/A
3	Tacoma Public Utilities (Tacoma, WA)	John Nierenberg	Jennie Wike	Affirmative	N/A
3	Tennessee Valley Authority	Ian Grant		Negative	Comments Submitted
3	Tri-State G and T Association, Inc.	Amanda Skubal		Affirmative	N/A
3	TXNM Energy	Scott Thompson		Negative	Comments Submitted

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	WEC Energy Group, Inc.	Christine Kane		Affirmative	N/A
3	Xcel Energy, Inc.	Nicholas Friebel	Joseph Gatten	Abstain	N/A
4	Austin Energy	Tony Hua		Affirmative	N/A
4	City Utilities of Springfield, Missouri	Jerry Bradshaw		Negative	Third-Party Comments
4	CMS Energy - Consumers Energy Company	Aric Root		Affirmative	N/A
4	FirstEnergy - FirstEnergy Corporation	Mark Garza		Affirmative	N/A
4	Georgia System Operations Corporation	Katrina Lyons		Affirmative	N/A
4	MGE Energy - Madison Gas and Electric Co.	Ray Mangiulli		Affirmative	N/A
4	North Carolina Electric Membership Corporation	Richard McCall	Scott Brame	Affirmative	N/A
4	Northern California Power Agency	Marty Hostler	Mason Jones	Negative	Comments Submitted
4	Public Utility District No. 1 of Snohomish County	John D. Martinsen		Negative	Comments Submitted
4	Sacramento Municipal Utility District	Foung Mua	Tim Kelley	Affirmative	N/A
4	Tacoma Public Utilities (Tacoma, WA)	Hien Ho	Jennie Wike	Affirmative	N/A
4	Utility Services, Inc.	Carver Powers		Affirmative	N/A
4	WEC Energy Group, Inc.	Candace Morakinyo		Affirmative	N/A
4	Western Power Pool	Kevin Conway		Negative	Comments Submitted
5	AEP	Thomas Foltz		Affirmative	N/A
5	AES - AES Corporation	Ruchi Shah		Negative	Comments Submitted
5	Ameren - Ameren Missouri	Sam Dwyer		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	American Municipal Power	Amy Ritts		Abstain	N/A
5	APS - Arizona Public Service Co.	Andrew Smith		Negative	Comments Submitted
5	Austin Energy	Michael Dillard		Affirmative	N/A
5	BC Hydro and Power Authority	Vijay Raghunathan		Abstain	N/A
5	Berkshire Hathaway - NV Energy	Dwanique Spiller		Affirmative	N/A
5	Black Hills Corporation	Sheila Suurmeier		Negative	Comments Submitted
5	Bonneville Power Administration	Milli Chennell		Affirmative	N/A
5	Calpine Corporation	Whitney Wallace		Affirmative	N/A
5	Choctaw Generation Limited Partnership, LLLP	Rob Watson		Negative	Third-Party Comments
5	CMS Energy - Consumers Energy Company	David Greyerbiehl		Affirmative	N/A
5	Colorado Springs Utilities	Jeffrey Icke		None	N/A
5	Con Ed - Consolidated Edison Co. of New York	Michelle Pagano		Affirmative	N/A
5	Constellation	Alison MacKellar		Negative	Comments Submitted
5	Dairyland Power Cooperative	Tommy Drea		Affirmative	N/A
5	Dominion - Dominion Resources, Inc.	Barbara Marion		Affirmative	N/A
5	DTE Energy - Detroit Edison Company	Mohamad Elhusseini		Affirmative	N/A
5	Duke Energy	Dale Goodwine		Negative	Third-Party Comments
5	EDF Renewable Energy	Steven Sconce		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Edison International - Southern California Edison Company	Selene Willis		Affirmative	N/A
5	Entergy - Entergy Services, Inc.	Gail Golden		None	N/A
5	Evergy	Jeremy Harris	Alan Kloster	Affirmative	N/A
5	FirstEnergy - FirstEnergy Corporation	Matthew Augustin		Affirmative	N/A
5	Greybeard Compliance Services, LLC	Mike Gabriel		None	N/A
5	Grid Strategies LLC	Michael Goggin		Negative	Comments Submitted
5	Hydro-Quebec (HQ)	Junji Yamaguchi	Chantal Mazza	Affirmative	N/A
5	Imperial Irrigation District	Tino Zaragoza	Denise Sanchez	Affirmative	N/A
5	Invenergy LLC	Rhonda Jones		None	N/A
5	JEA	John Babik		Affirmative	N/A
5	Leeward Renewable Energy	Rob Robertson		None	N/A
5	Lincoln Electric System	Brittany Millard		Affirmative	N/A
5	Lower Colorado River Authority	Joseph Scott		Abstain	N/A
5	Manitoba Hydro	Kristy-Lee Young		Negative	Comments Submitted
5	Muscatine Power and Water	Chance Back		Affirmative	N/A
5	National Grid USA	Robin Berry		None	N/A
5	NB Power Corporation - New Brunswick Power Transmission Corporation	David Melanson		Abstain	N/A
5	Nebraska Public Power District	Ronald Bender		Affirmative	N/A
5	New York Power Authority	Zahid Qayyum		Negative	Comments Submitted

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	NextEra Energy	Richard Vendetti		Abstain	N/A
5	NiSource - Northern Indiana Public Service Co.	Kathryn Tackett		Affirmative	N/A
5	North Carolina Electric Membership Corporation	Reid Cashion	Scott Brame	Affirmative	N/A
5	Northern California Power Agency	Jeremy Lawson	Mason Jones	Negative	Comments Submitted
5	OGE Energy - Oklahoma Gas and Electric Co.	Patrick Wells		Affirmative	N/A
5	Oglethorpe Power Corporation	Donna Johnson		Affirmative	N/A
5	Oklahoma Municipal Power Authority	Patrick Tuttle		Affirmative	N/A
5	Omaha Public Power District	Kayleigh Wilkerson		None	N/A
5	Orsted Americas	Keith Smith		None	N/A
5	Pacific Gas and Electric Company	Tyler Brun	Bob Cardle	Affirmative	N/A
5	Platte River Power Authority	Jon Osell	Jennifer Sieg	Affirmative	N/A
5	Portland General Electric Co.	Ryan Olson		Abstain	N/A
5	PPL - Louisville Gas and Electric Co.	Julie Hostrander		Affirmative	N/A
5	Public Utility District No. 1 of Snohomish County	Becky Burden		Negative	Comments Submitted
5	Sacramento Municipal Utility District	Ryder Couch	Tim Kelley	Affirmative	N/A
5	Salt River Project	Matthew Jaramilla		Affirmative	N/A
5	Santee Cooper	Carey Salisbury		Affirmative	N/A
5	Seminole Electric Cooperative, Inc.	Melanie Wong		Negative	Comments Submitted

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Sempra - San Diego Gas and Electric	Jennifer Wright		Affirmative	N/A
5	Southern Company - Southern Company Generation	Leslie Burke		Negative	Comments Submitted
5	Southern Indiana Gas and Electric Co.	Larry Rogers		Affirmative	N/A
5	Tallahassee Electric (City of Tallahassee, FL)	Karen Weaver		Abstain	N/A
5	Tennessee Valley Authority	Darren Boehm		Negative	Comments Submitted
5	TransAlta Corporation	Ashley Scheelar		Negative	Comments Submitted
5	Tri-State G and T Association, Inc.	Sergio Banuelos		None	N/A
5	U.S. Bureau of Reclamation	Wendy Kalidass		Negative	Comments Submitted
5	WEC Energy Group, Inc.	Michelle Hribar		Affirmative	N/A
5	Xcel Energy, Inc.	Gerry Huitt		Affirmative	N/A
6	AEP	Randy Calhoun		Affirmative	N/A
6	Ameren - Ameren Services	Robert Quinlivan		Affirmative	N/A
6	APS - Arizona Public Service Co.	Marcus Bortman		Negative	Comments Submitted
6	Associated Electric Cooperative, Inc.	Brian Ackermann		Affirmative	N/A
6	Austin Energy	Imane Mrini		None	N/A
6	Berkshire Hathaway - PacifiCorp	Lindsay Wickizer		None	N/A
6	Black Hills Corporation	Josh Schumacher		Negative	Comments Submitted
6	Bonneville Power Administration	Tanner Brier		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
6	Cleco Corporation	Robert Hirschak		Negative	Third-Party Comments
6	Con Ed - Consolidated Edison Co. of New York	Jason Chandler		Affirmative	N/A
6	Constellation	Kimberly Turco		Negative	Comments Submitted
6	Dominion - Dominion Resources, Inc.	Sean Bodkin		Affirmative	N/A
6	Duke Energy	John Sturgeon		Negative	Third-Party Comments
6	Edison International - Southern California Edison Company	Stephanie Kenny		Affirmative	N/A
6	Entergy	Julie Hall		None	N/A
6	Evergy	Tiffany Lake	Alan Kloster	Affirmative	N/A
6	FirstEnergy - FirstEnergy Corporation	Stacey Sheehan		Affirmative	N/A
6	Imperial Irrigation District	Diana Torres	Denise Sanchez	Affirmative	N/A
6	Invenergy LLC	Colin Chilcoat		Affirmative	N/A
6	Los Angeles Department of Water and Power	Anton Vu		Abstain	N/A
6	Manitoba Hydro	Brandin Stoesz		None	N/A
6	Muscatine Power and Water	Nicholas Burns		Affirmative	N/A
6	New York Power Authority	Shelly Dineen		Negative	Comments Submitted
6	NextEra Energy - Florida Power and Light Co.	Justin Welty		Negative	Comments Submitted
6	NiSource - Northern Indiana Public Service Co.	Eugene Johnson		Affirmative	N/A
6	Northern California Power Agency	Benjamin Hector	Mason Jones	Negative	Comments Submitted

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
6	OGE Energy - Oklahoma Gas and Electric Co.	Ashley F Stringer		Affirmative	N/A
6	Omaha Public Power District	Shonda McCain		Affirmative	N/A
6	Platte River Power Authority	Sabrina Martz		None	N/A
6	Portland General Electric Co.	Stefanie Burke		Abstain	N/A
6	Powerex Corporation	Raj Hundal		Abstain	N/A
6	PPL - Louisville Gas and Electric Co.	Linn Oelker		Affirmative	N/A
6	Sacramento Municipal Utility District	Charles Norton	Tim Kelley	Affirmative	N/A
6	Salt River Project	Timothy Singh		Affirmative	N/A
6	Santee Cooper	Marty Watson		Affirmative	N/A
6	Seminole Electric Cooperative, Inc.	Bret Galbraith		Negative	Comments Submitted
6	Snohomish County PUD No. 1	John Liang		Negative	Third-Party Comments
6	Southern Company - Southern Company Generation and Energy Marketing	Matthew O'neal		Negative	Comments Submitted
6	Southern Indiana Gas and Electric Co.	Kati Barr		Affirmative	N/A
6	Tacoma Public Utilities (Tacoma, WA)	Terry Gifford	Jennie Wike	Affirmative	N/A
6	Tennessee Valley Authority	Jeffrey Powell		Negative	Comments Submitted
6	WEC Energy Group, Inc.	David Boeshaar		Affirmative	N/A
6	Western Area Power Administration	Jennifer Neville		Affirmative	N/A
6	Xcel Energy, Inc.	Patrick Flaherty		None	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
10	Midwest Reliability Organization	Mark Flanary		Affirmative	N/A
10	Northeast Power Coordinating Council	Ruida Shu		Abstain	N/A
10	ReliabilityFirst	Tremayne Brown	Greg Sorenson	Affirmative	N/A
10	SERC Reliability Corporation	Dave Krueger		Affirmative	N/A
10	Texas Reliability Entity, Inc.	Rachel Coyne		Affirmative	N/A
10	Western Electricity Coordinating Council	Steven Rueckert		Affirmative	N/A

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Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard is adopted by the NERC Board of Trustees (Board).

Description of Current Draft

This is the final draft of the proposed definitions for a 10-day ballot.

Completed Actions	Date
Standards Committee approved Standards Authorization Request (SAR)	June 12, 2024
SAR posted for comment	July 2 – August 20, 2024
45-day formal comment period with initial ballot	March 24 – May 7, 2025

Anticipated Actions	Date
10-day final ballot	July 2 – 14, 2025
Board adoption	August 2025

Modified Term(s) Used in NERC Reliability Standards

This section includes the modified terms that will be included in the NERC Glossary of Terms to be used in NERC Reliability Standards upon applicable regulatory approval. The terms proposed below are intended to be used in NERC Reliability Standards applicable to Category 2 Generator Owners and Generator Operators.

Terms:

Generator Owner (GO): The entity that: 1) owns and maintains generating Facility(ies) (Category 1 GO); or 2) owns and maintains non-BES Inverter-Based Resource(s) that either have or contribute to an aggregate 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 (Category 2 GO).

Generator Operator (GOP): The entity that: 1) operates generating Facility(ies) and performs the functions of supplying energy and Interconnected Operations Services (Category 1 GOP); or 2) operates non-BES Inverter-Based Resources(s) that either have or contribute to an aggregate 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 (Category 2 GOP).

Version History

Version	Date	Action	Change Tracking
1	TBD	Modified Generator Owner Definition Modified Generator Operator Definition	

Implementation Plan

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

Proposed Modified Definitions in the NERC Glossary of Terms

This section includes modified definitions for inclusion in the *Glossary of Terms used in NERC Reliability Standards* (“Glossary”), as well as current NERC *Glossary* terms proposed for retirement.

Proposed Modified Definition(s):

- Generator Owner (GO)
- Generator Operator (GOP)

Background

Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) was initiated in June 2024 and concerns the reliability impacts of Inverter-Based Resources (IBRs) on the Bulk-Power System (BPS) that do not meet the current definition of Bulk Electric System (BES) and have not historically been required to be registered with NERC for compliance with the NERC Reliability Standards. Such concerns are discussed in detail in the Federal Energy Regulatory Commission (FERC) November 17, 2022 order in Docket No. RD22-4-000, in which FERC directed NERC to develop a work plan to address the registration of these IBRs and ensure their compliance with Reliability Standards by certain milestone dates. See *Registration of IBRs*, 181 FERC ¶ 61,124 (2022).

FERC approved changes to the NERC Rules of Procedure (ROP) registry criteria to include certain non-BES IBRs in the Generator Owner (GO) and Generator Operator (GOP) categories. Revising the GO and GOP definitions in the NERC Glossary of Terms to align with the registry criteria will ensure these previously unregistered IBRs will be subject to the NERC Reliability Standards and mitigate their impact on the BPS. See *Order Approving Revisions to NERC ROP and Requiring Compliance Filing*, 187 FERC ¶ 61,196 (2024).

General Considerations

The Project 2024-01 Drafting Team (DT) has proposed modification to the definitions of “Generator Owner” and “Generator Operator” as defined in the NERC Glossary to ensure the inclusion of Category 2 criteria as referenced in the NERC ROP, which includes some IBRs connected to the BPS that do not meet the current definition of BES.

Effective Date for the Modified Definitions for NERC Glossary of Terms

Where approval by an applicable governmental authority is required, the modified definitions shall become effective on the first day of the first calendar quarter after the effective date of the

applicable governmental authority's order approving the definitions, or as otherwise provided for by the applicable governmental authority.

Where approval by an applicable governmental authority is not required, the modified definitions shall become effective on the first day of the first calendar quarter after the date the definitions are adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

Compliance Dates for the Listed Standards

Eight (8) Reliability Standards have been identified through a NERC staff analysis¹ as applicable and enforceable to generation assets that meet the Category 2 criteria without any revisions to those Reliability Standards or requirements.

For those generation assets that meet the Category 2 criteria in the modified definitions, GOs and GOPs shall comply with the below-listed Reliability Standards on May 15, 2026, or as otherwise provided for by the applicable governmental authorities in that jurisdiction.

These standards are as follows:

- BAL-001-TRE-2
- IRO-010-5
- MOD-032-1
- PRC-012-2
- PRC-017-1
- TOP-003-6.1
- VAR-001-5
- VAR-002-4.1

Reliability Standards that specify they are applicable only to BES Facilities will not be enforceable on Category 2 facilities unless there is a specific Reliability Standards project that revises them to include Category 2 facilities.

For requirements in the Reliability Standards that require an action be taken in response to an action or request by another functional entity (e.g., responding to data specifications or following voltage schedules), any GO or GOP with one or more facilities that meet the Category 2 criteria, shall be required to comply only after the action or request is made. This only applies to GO or GOP Category 2 facilities.

¹ [NERC GO-GOP Analysis Summary.docx](#)

Currently approved Reliability Standards PRC-028-1, PRC-030-1, and recently filed NERC Reliability Standard PRC-029-1 is drafted such that, if approved, will be enforceable for Category 2 GOs and GOPs based on the Implementation Plans for those Reliability Standards.

All other Reliability Standards using GO and GOP may become applicable and enforceable to generation assets that meet the Category 2 criteria upon their revision² and in accordance with their respective revised Reliability Standard language and Implementation Plans.

Definitions Proposed for Retirement

The definitions proposed for retirement shall be retired immediately prior to the effective date of the modified GO and GOP definitions in the particular jurisdiction in which these modified definitions become effective.

² [NERC ROP Appendix 3A](#)

Implementation Plan

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

Proposed Modified Definitions in the NERC Glossary of Terms

This section includes modified definitions for inclusion in the *Glossary of Terms used in NERC Reliability Standards* (“*Glossary*”), as well as current NERC *Glossary* terms proposed for retirement.

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- Generator Operator (GOP)

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Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator) was initiated in June 2024 and concerns the reliability impacts of Inverter-Based Resources (IBRs) on the Bulk-Power System (BPS) that do not meet the current definition of Bulk Electric System (BES) and have not historically been required to be registered with NERC for compliance with the NERC Reliability Standards. Such concerns are discussed in detail in the Federal Energy Regulatory Commission (FERC) November 17, 2022 order in Docket No. RD22-4-000, in which FERC directed NERC to develop a work plan to address the registration of these IBRs and ensure their compliance with Reliability Standards by certain milestone dates. See *Registration of IBRs*, 181 FERC ¶ 61,124 (2022).

FERC approved changes to the NERC Rules of Procedure (ROP) registry criteria to include certain non-BES IBRs in the Generator Owner (GO) and Generator Operator (GOP) categories. Revising the GO and GOP definitions in the NERC *Glossary of Terms* to align with the registry criteria will ensure these previously unregistered IBRs will be subject to the NERC Reliability Standards and mitigate their impact on the BPS. See *Order Approving Revisions to NERC ROP and Requiring Compliance Filing*, 187 FERC ¶ 61,196 (2024).

General Considerations

The Project 2024-01 Drafting Team (DT) has proposed modification to the definitions of “Generator Owner” and “Generator Operator” as defined in the NERC *Glossary* to ensure the inclusion of Category 2 criteria as referenced in the NERC ROP, which includes some IBRs connected to the BPS that do not meet the current definition of BES.

Effective Date for the Modified Definitions for NERC Glossary of Terms

Where approval by an applicable governmental authority is required, the modified definitions shall become effective on the first day of the first calendar quarter after the effective date of the applicable governmental authority's order approving the definitions, or as otherwise provided for by the applicable governmental authority.

Where approval by an applicable governmental authority is not required, the modified definitions shall become effective on the first day of the first calendar quarter after the date the definitions are adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

Phased-In Compliance Dates for the Listed Standards

Eight (8) Reliability Standards have been identified through a NERC staff analysis¹ as applicable and enforceable to generation assets that meet the Category 2 criteria without any revisions to those Reliability Standards or requirements.

For those generation assets that meet the Category 2 criteria in the modified definitions, GOs and GOPs shall comply with the below-listed Reliability Standards ~~the later of on~~ May ~~1615~~, 2026, or as otherwise provided for by the applicable governmental authorities in that jurisdiction.

These Reliability Standards are as follows:

- BAL-001-TRE-2
- IRO-010-5
- MOD-032-1
- PRC-012-2
- PRC-017-1
- TOP-003-6.1
- VAR-001-5
- VAR-002-4.1

Reliability Standards that specify they are applicable only to BES Facilities will not be enforceable on Category 2 facilities unless there is a specific Reliability Standards project that revises them to include Category 2 facilities.

For requirements in the Reliability Standards that require an action be taken in response to an action or request by another functional entity (e.g. responding to data specifications or following voltage schedules), any GO or GOP with one or more facilities that meet the Category 2 criteria, shall be

¹ [NERC GO-GOP Analysis Summary.docx](#)

required to comply only after the action or request is made. This only applies to GO or GOP Category 2 facilities.

Currently approved Reliability Standards PRC-028-1, PRC-030-1, and recently filed NERC Reliability Standard PRC-029-1 is drafted such that, if approved, will be enforceable for Category 2 GOs and GOPs based on the Implementation Plans for those Reliability Standards.

All other Reliability Standards using GO and GOP may become applicable and enforceable to generation assets that meet the Category 2 criteria upon their revision² and in accordance with their respective revised Reliability Standard language and Implementation Plans.

Definitions Proposed for Retirement

The definitions proposed for retirement shall be retired immediately prior to the effective date of the modified GO and GOP definitions in the particular jurisdiction in which these modified definitions become effective.

² [NERC ROP Appendix 3A](#)

Standards Announcement

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

Final Ballot Open through July 14, 2025

[Now Available](#)

Final ballots for **Project 2024-01 Rules of Procedure Definitions Alignment (Generator Owner and Generator Operator)** revised definitions of Generator Owner and Generator Operator for inclusion in the *Glossary of Terms Used in NERC Reliability Standards* and the associated Implementation Plan are open through **8 p.m. Eastern, Monday, July 14, 2025**.

The Implementation Plan contains minor changes to provide further clarification of the applicability upon approval of the revised definitions. There were no further changes made to revised definitions since the initial ballot.

Balloting

In the final ballot, votes are counted by exception. Votes from the previous ballot are automatically carried over in the final ballot. Only members of the applicable ballot pools can cast a vote. Ballot pool members who previously voted have the option to change their vote in the final ballot. Ballot pool members who did not cast a vote during the previous ballot can vote in the final ballot.

Members of the ballot pool(s) associated with this project can log into the Standards Balloting and Commenting System (SBS) and submit votes [here](#).

- *Contact NERC IT support directly at <https://support.nerc.net/> (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.*
- *Passwords expire every **6 months** and must be reset.*
- *The SBS **is not** supported for use on mobile devices.*
- *Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.*

Next Steps

The voting results will be posted and announced after the ballots close. If approved, the definitions will be submitted to the Board of Trustees for adoption and then filed with the appropriate regulatory authorities.

For information on the Standards Development Process, refer to the [Standard Processes Manual](#).

For more information or assistance, contact Senior Standards Developer, [Jessica Harris](#) (via email) or at 404-710-4885.



North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

BALLOT RESULTS

Ballot Name: 2024-01 Rules of Procedure Definitions Alignment (GO and GOP) | Draft 1 GO and GOP Definitions FN 2 DEF

Voting Start Date: 7/2/2025 11:26:07 AM

Voting End Date: 7/14/2025 8:00:00 PM

Ballot Type: DEF

Ballot Activity: FN

Ballot Series: 2

Total # Votes: 243

Total Ballot Pool: 267

Quorum: 91.01

Quorum Established Date: 7/2/2025 1:58:53 PM

Weighted Segment Value: 85.98

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 1	67	1	46	0.92	4	0.08	0	8	9
Segment: 2	6	0.6	6	0.6	0	0	0	0	0
Segment: 3	62	1	49	0.907	5	0.093	0	6	2
Segment: 4	14	1	10	0.714	4	0.286	0	0	0
Segment: 5	68	1	42	0.792	11	0.208	0	6	9
Segment: 6	44	1	30	0.811	7	0.189	0	3	4
Segment: 7	0	0	0	0	0	0	0	0	0
Segment: 8	0	0	0	0	0	0	0	0	0
Segment:	0	0	0	0	0	0	0	0	0

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 10	6	0.5	5	0.5	0	0	0	1	0
Totals:	267	6.1	188	5.245	31	0.855	0	24	24

BALLOT POOL MEMBERS

Show entries

Search:

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	AEP - AEP Service Corporation	Dennis Sauriol		Affirmative	N/A
1	Allete - Minnesota Power, Inc.	Hillary Creurer		Abstain	N/A
1	Ameren - Ameren Services	Tamara Evey		None	N/A
1	American Transmission Company, LLC	Amy Wilke		None	N/A
1	APS - Arizona Public Service Co.	Daniela Atanasovski		Negative	N/A
1	Associated Electric Cooperative, Inc.	Mark Riley		Affirmative	N/A
1	Avista - Avista Corporation	Mike Magruder		Affirmative	N/A
1	Balancing Authority of Northern California	Kris Kirkegaard	Tim Kelley	Affirmative	N/A
1	BC Hydro and Power Authority	Patricia Robertson		Abstain	N/A
1	Berkshire Hathaway Energy - MidAmerican Energy Co.	Thomas Breen		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Black Hills Corporation	Trevor Rombough		Affirmative	N/A
1	CenterPoint Energy Houston Electric, LLC	Daniela Hammons		Affirmative	N/A
1	Central Iowa Power Cooperative	Kevin Lyons		Affirmative	N/A
1	City Utilities of Springfield, Missouri	Michael Bowman		None	N/A
1	Colorado Springs Utilities	Corey Walker		Affirmative	N/A
1	Con Ed - Consolidated Edison Co. of New York	Dermot Smyth		Affirmative	N/A
1	Dairyland Power Cooperative	Karrie Schuldt		Affirmative	N/A
1	Dominion - Dominion Virginia Power	Steven Belle		Affirmative	N/A
1	Duke Energy	Katherine Street		Affirmative	N/A
1	Edison International - Southern California Edison Company	Robert Blackney		Affirmative	N/A
1	Entergy	Brian Lindsey		None	N/A
1	Evergy	Kevin Frick	Alan Kloster	Affirmative	N/A
1	Exelon	Daniel Gacek		Affirmative	N/A
1	FirstEnergy - FirstEnergy Corporation	Theresa Ciancio		Affirmative	N/A
1	Georgia Transmission Corporation	Greg Davis		Affirmative	N/A
1	Glencoe Light and Power Commission	Terry Volkmann		None	N/A
1	Great River Energy	Gordon Pietsch		None	N/A
1	Hydro-Quebec (HQ)	Nicolas Turcotte	Chantal Mazza	Affirmative	N/A
1	IDACORP - Idaho Power Company	Sean Steffensen		None	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Imperial Irrigation District	Jesus Sammy Alcaraz	Denise Sanchez	Affirmative	N/A
1	International Transmission Company Holdings Corporation	Michael Moltane	Allie Gavin	Abstain	N/A
1	JEA	Joseph McClung		Affirmative	N/A
1	Lincoln Electric System	Josh Johnson		Affirmative	N/A
1	Long Island Power Authority	Isidoro Behar		Abstain	N/A
1	Lower Colorado River Authority	Matt Lewis		Abstain	N/A
1	M and A Electric Power Cooperative	William Price		Affirmative	N/A
1	Manitoba Hydro	Nazra Gladu		Affirmative	N/A
1	Minnkota Power Cooperative Inc.	Theresa Allard	Nikki Carson-Marquis	Affirmative	N/A
1	Muscatine Power and Water	Andrew Kurriger		Affirmative	N/A
1	N.W. Electric Power Cooperative, Inc.	Mark Ramsey		Affirmative	N/A
1	National Grid USA	Jacqueline Ryan		Abstain	N/A
1	Nebraska Public Power District	Jamison Cawley		Affirmative	N/A
1	New York Power Authority	Daniel Valle		Affirmative	N/A
1	NextEra Energy - Florida Power and Light Co.	Silvia Mitchell		Affirmative	N/A
1	NiSource - Northern Indiana Public Service Co.	Alison Nickells		Affirmative	N/A
1	Northeast Missouri Electric Power Cooperative	Brett Douglas		Affirmative	N/A
1	OGE Energy - Oklahoma Gas and Electric Co.	Terri Pyle		Affirmative	N/A
1	Pedernales Electric Cooperative, Inc.	Bradley Collard		None	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Platte River Power Authority	Marissa Archie		Affirmative	N/A
1	Portland General Electric Co.	Brooke Jockin		None	N/A
1	PPL Electric Utilities Corporation	Michelle McCartney Longo		Affirmative	N/A
1	Public Utility District No. 1 of Snohomish County	Alyssia Rhoads		Negative	N/A
1	Public Utility District No. 2 of Grant County, Washington	Joanne Anderson		Abstain	N/A
1	Sacramento Municipal Utility District	Wei Shao	Tim Kelley	Affirmative	N/A
1	Salt River Project	Laura Somak		Affirmative	N/A
1	Santee Cooper	Chris Wagner		Affirmative	N/A
1	Sempra - San Diego Gas and Electric	Mohamed Derbas		Affirmative	N/A
1	Southern Company - Southern Company Services, Inc.	Matt Carden		Affirmative	N/A
1	Sunflower Electric Power Corporation	Paul Mehlhaff		Abstain	N/A
1	Tacoma Public Utilities (Tacoma, WA)	John Merrell	Jennie Wike	Affirmative	N/A
1	Tennessee Valley Authority	David Plumb		Negative	N/A
1	Tri-State G and T Association, Inc.	Donna Wood		Affirmative	N/A
1	TXNM Energy	Lynn Goldstein		Affirmative	N/A
1	U.S. Bureau of Reclamation	Richard Jackson		Negative	N/A
1	Unisource - Tucson Electric Power Co.	Jessica Cordero		Affirmative	N/A
1	Western Area Power Administration	Ben Hammer		Affirmative	N/A
1	Xcel Energy, Inc.	Eric Barry		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
2	Electric Reliability Council of Texas, Inc.	Kennedy Meier		Affirmative	N/A
2	ISO New England, Inc.	John Pearson		Affirmative	N/A
2	Midcontinent ISO, Inc.	Kirsten Rowley		Affirmative	N/A
2	New York Independent System Operator	Gregory Campoli		Affirmative	N/A
2	PJM Interconnection, L.L.C.	Thomas Foster	Elizabeth Davis	Affirmative	N/A
2	Southwest Power Pool, Inc. (RTO)	Joshua Phillips		Affirmative	N/A
3	AEP	Jodi Yeary		Affirmative	N/A
3	AES - Indianapolis Power and Light Co.	Sing Tay		Affirmative	N/A
3	Ameren - Ameren Services	David Jendras Sr	Nick Leathers	Affirmative	N/A
3	APS - Arizona Public Service Co.	Jessica Lopez		Negative	N/A
3	Associated Electric Cooperative, Inc.	Todd Bennett		Affirmative	N/A
3	Austin Energy	Lovita Griffin		Affirmative	N/A
3	Avista - Avista Corporation	Robert Follini		Affirmative	N/A
3	BC Hydro and Power Authority	Ming Jiang		Abstain	N/A
3	Berkshire Hathaway Energy - MidAmerican Energy Co.	Amy Key		Affirmative	N/A
3	Black Hills Corporation	Josh Combs		Affirmative	N/A
3	Bonneville Power Administration	Ron Sporseen		Affirmative	N/A
3	CMS Energy - Consumers Energy Company	Karl Blaszkowski		Affirmative	N/A
3	Colorado Springs Utilities	Hillary Dobson		Affirmative	N/A
3	Con Ed - Consolidated Edison Co. of New York	Lincoln Burton		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	Dominion - Dominion Virginia Power	Victoria Crider		Affirmative	N/A
3	DTE Energy - Detroit Edison Company	Marvin Johnson		Affirmative	N/A
3	Edison International - Southern California Edison Company	Romel Aquino		Affirmative	N/A
3	Entergy	James Keele		None	N/A
3	Eergy	Marcus Moor	Alan Kloster	Affirmative	N/A
3	Eversource Energy	Vicki O'Leary		Abstain	N/A
3	Exelon	Kinte Whitehead		Affirmative	N/A
3	FirstEnergy - FirstEnergy Corporation	Aaron Ghodooshim		Affirmative	N/A
3	Georgia System Operations Corporation	Scott McGough		Affirmative	N/A
3	Great River Energy	Michael Brytowski		Affirmative	N/A
3	Imperial Irrigation District	George Kirschner	Denise Sanchez	Affirmative	N/A
3	JEA	Marilyn Williams		Affirmative	N/A
3	KAMO Electric Cooperative	Tony Gott		Affirmative	N/A
3	Lincoln Electric System	Sam Christensen		Affirmative	N/A
3	Los Angeles Department of Water and Power	Fausto Serratos		Abstain	N/A
3	M and A Electric Power Cooperative	Gary Dollins		Affirmative	N/A
3	Manitoba Hydro	Mike Smith		Affirmative	N/A
3	MGE Energy - Madison Gas and Electric Co.	Benjamin Widder		Affirmative	N/A
3	Muscatine Power and Water	Seth Shoemaker		Affirmative	N/A
3	National Grid USA	Brian Shanahan		Abstain	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	Nebraska Public Power District	Tony Eddleman		Affirmative	N/A
3	New York Power Authority	Richard Machado		Affirmative	N/A
3	NextEra Energy - Florida Power and Light Co.	Karen Demos		Affirmative	N/A
3	NiSource - Northern Indiana Public Service Co.	Steven Taddeucci		Affirmative	N/A
3	North Carolina Electric Membership Corporation	Tyler Bellomy	Scott Brame	Affirmative	N/A
3	Northeast Missouri Electric Power Cooperative	Skyler Wiegmann		Affirmative	N/A
3	Northern California Power Agency	Michael Whitney	Mason Jones	Negative	N/A
3	NW Electric Power Cooperative, Inc.	Heath Henry		Affirmative	N/A
3	OGE Energy - Oklahoma Gas and Electric Co.	Donald Hargrove		Affirmative	N/A
3	Omaha Public Power District	David Heins		None	N/A
3	Platte River Power Authority	Richard Kiess		Affirmative	N/A
3	Portland General Electric Co.	Mayra Franco		Abstain	N/A
3	PPL - Louisville Gas and Electric Co.	James Frank		Affirmative	N/A
3	Sacramento Municipal Utility District	Nicole Looney	Tim Kelley	Affirmative	N/A
3	Salt River Project	Mathew Weber		Affirmative	N/A
3	Santee Cooper	Vicky Budreau		Affirmative	N/A
3	Seminole Electric Cooperative, Inc.	Usama Tahir		Negative	N/A
3	Sempra - San Diego Gas and Electric	Bryan Bennett		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	Sho-Me Power Electric Cooperative	Jarrold Murdaugh		Affirmative	N/A
3	Snohomish County PUD No. 1	Holly Chaney		Negative	N/A
3	Southern Company - Alabama Power Company	Joel Dembowski		Affirmative	N/A
3	Southern Indiana Gas and Electric Co.	Ryan Snyder		Affirmative	N/A
3	Tacoma Public Utilities (Tacoma, WA)	John Nierenberg	Jennie Wike	Affirmative	N/A
3	Tennessee Valley Authority	Ian Grant		Negative	N/A
3	Tri-State G and T Association, Inc.	Amanda Skubal		Affirmative	N/A
3	TXNM Energy	Scott Thompson		Affirmative	N/A
3	WEC Energy Group, Inc.	Christine Kane		Affirmative	N/A
3	Xcel Energy, Inc.	Nicholas Friebe	Joseph Gatten	Abstain	N/A
4	Austin Energy	Tony Hua		Affirmative	N/A
4	City Utilities of Springfield, Missouri	Jerry Bradshaw		Negative	N/A
4	CMS Energy - Consumers Energy Company	Aric Root		Affirmative	N/A
4	FirstEnergy - FirstEnergy Corporation	Mark Garza		Affirmative	N/A
4	Georgia System Operations Corporation	Katrina Lyons		Affirmative	N/A
4	MGE Energy - Madison Gas and Electric Co.	Ray Mangiulli		Affirmative	N/A
4	North Carolina Electric Membership Corporation	Richard McCall	Scott Brame	Affirmative	N/A
4	Northern California Power Agency	Marty Hostler	Mason Jones	Negative	N/A
4	Public Utility District No. 1 of Snohomish County	John D. Martinsen		Negative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
4	Sacramento Municipal Utility District	Foung Mua	Tim Kelley	Affirmative	N/A
4	Tacoma Public Utilities (Tacoma, WA)	Hien Ho	Jennie Wike	Affirmative	N/A
4	Utility Services, Inc.	Carver Powers		Affirmative	N/A
4	WEC Energy Group, Inc.	Candace Morakinyo		Affirmative	N/A
4	Western Power Pool	Kevin Conway		Negative	N/A
5	AEP	Thomas Foltz		Affirmative	N/A
5	AES - AES Corporation	Ruchi Shah		Negative	N/A
5	Ameren - Ameren Missouri	Sam Dwyer		Affirmative	N/A
5	American Municipal Power	Amy Ritts		Affirmative	N/A
5	APS - Arizona Public Service Co.	Andrew Smith		Negative	N/A
5	Austin Energy	Michael Dillard		Affirmative	N/A
5	BC Hydro and Power Authority	Vijay Raghunathan		Abstain	N/A
5	Berkshire Hathaway - NV Energy	Dwanique Spiller		Affirmative	N/A
5	Black Hills Corporation	Sheila Suurmeier		Affirmative	N/A
5	Bonneville Power Administration	Milli Chennell		Affirmative	N/A
5	Calpine Corporation	Whitney Wallace		Affirmative	N/A
5	Choctaw Generation Limited Partnership, LLLP	Rob Watson		Affirmative	N/A
5	CMS Energy - Consumers Energy Company	David Greyerbiehl		Affirmative	N/A
5	Colorado Springs Utilities	Jeffrey Icke		Affirmative	N/A
5	Con Ed - Consolidated Edison Co. of New York	Michelle Pagano		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Constellation	Alison MacKellar		Negative	N/A
5	Dairyland Power Cooperative	Tommy Drea		Affirmative	N/A
5	Dominion - Dominion Resources, Inc.	Barbara Marion		Affirmative	N/A
5	DTE Energy	George Goddard		None	N/A
5	Duke Energy	Dale Goodwine		Affirmative	N/A
5	EDF Renewable Energy	Steven Sonce		Negative	N/A
5	Edison International - Southern California Edison Company	Selene Willis		Affirmative	N/A
5	Entergy - Entergy Services, Inc.	Gail Golden		None	N/A
5	Evergy	Jeremy Harris	Alan Kloster	Affirmative	N/A
5	FirstEnergy - FirstEnergy Corporation	Matthew Augustin		Affirmative	N/A
5	Greybeard Compliance Services, LLC	Mike Gabriel		None	N/A
5	Grid Strategies LLC	Michael Goggin		Negative	N/A
5	Hydro-Quebec (HQ)	Junji Yamaguchi	Chantal Mazza	Affirmative	N/A
5	Imperial Irrigation District	Tino Zaragoza	Denise Sanchez	Affirmative	N/A
5	Invenergy LLC	Rhonda Jones		None	N/A
5	JEA	John Babik		Affirmative	N/A
5	Leeward Renewable Energy	Rob Robertson		None	N/A
5	Lincoln Electric System	Brittany Millard		Affirmative	N/A
5	Lower Colorado River Authority	Joseph Scott		Abstain	N/A
5	Manitoba Hydro	Kristy-Lee Young		Affirmative	N/A
5	Muscatine Power and Water	Chance Back		Affirmative	N/A
5	National Machine USA	Tom Berry		Abstain	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	NB Power Corporation - New Brunswick Power Transmission Corporation	David Melanson		Abstain	N/A
5	Nebraska Public Power District	Ronald Bender		Affirmative	N/A
5	New York Power Authority	Zahid Qayyum		Affirmative	N/A
5	NextEra Energy	Richard Vendetti		Affirmative	N/A
5	NiSource - Northern Indiana Public Service Co.	Kathryn Tackett		Affirmative	N/A
5	North Carolina Electric Membership Corporation	Reid Cashion	Scott Brame	Affirmative	N/A
5	Northern California Power Agency	Jeremy Lawson	Mason Jones	Negative	N/A
5	OGE Energy - Oklahoma Gas and Electric Co.	Patrick Wells		Affirmative	N/A
5	Oglethorpe Power Corporation	Donna Johnson		Affirmative	N/A
5	Oklahoma Municipal Power Authority	Patrick Tuttle		Affirmative	N/A
5	Omaha Public Power District	Kayleigh Wilkerson		None	N/A
5	Orsted Americas	Keith Smith		None	N/A
5	Pacific Gas and Electric Company	Tyler Brun	Bob Cardle	Affirmative	N/A
5	Platte River Power Authority	Jon Osell	Jennifer Sieg	Affirmative	N/A
5	Portland General Electric Co.	Ryan Olson		Abstain	N/A
5	PPL - Louisville Gas and Electric Co.	Julie Hostrander		Affirmative	N/A
5	Public Utility District No. 1 of Snohomish County	Becky Burden		Negative	N/A
5	Sacramento Municipal Utility District	Ryder Couch	Tim Kelley	Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Salt River Project	Matthew Jaramilla		Affirmative	N/A
5	Santee Cooper	Carey Salisbury		Affirmative	N/A
5	Seminole Electric Cooperative, Inc.	Melanie Wong		Negative	N/A
5	Sempra - San Diego Gas and Electric	Jennifer Wright		Affirmative	N/A
5	Southern Company - Southern Company Generation	Leslie Burke		Affirmative	N/A
5	Southern Indiana Gas and Electric Co.	Larry Rogers		Affirmative	N/A
5	Tallahassee Electric (City of Tallahassee, FL)	Karen Weaver		Abstain	N/A
5	Tennessee Valley Authority	Darren Boehm		Negative	N/A
5	TransAlta Corporation	Ashley Scheelar		Negative	N/A
5	Tri-State G and T Association, Inc.	Sergio Banuelos		None	N/A
5	U.S. Bureau of Reclamation	Wendy Kalidass		Negative	N/A
5	WEC Energy Group, Inc.	Catherine Doyle		None	N/A
5	Xcel Energy, Inc.	Gerry Huitt		Affirmative	N/A
6	AEP	Randy Calhoun		Affirmative	N/A
6	Ameren - Ameren Services	Robert Quinlivan		Affirmative	N/A
6	APS - Arizona Public Service Co.	Marcus Bortman		Negative	N/A
6	Associated Electric Cooperative, Inc.	Brian Ackermann		Affirmative	N/A
6	Austin Energy	Imane Mrini		None	N/A
6	Berkshire Hathaway - PacifiCorp	Lindsay Wickizer		Affirmative	N/A
6	Black Hills Corporation	Josh Schumacher		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
6	Bonneville Power Administration	Tanner Brier		Affirmative	N/A
6	Cleco Corporation	Robert Hirschak		Negative	N/A
6	Con Ed - Consolidated Edison Co. of New York	Jason Chandler		Affirmative	N/A
6	Constellation	Kimberly Turco		Negative	N/A
6	Dominion - Dominion Resources, Inc.	Bill Garvey		Affirmative	N/A
6	Duke Energy	John Sturgeon		Affirmative	N/A
6	Edison International - Southern California Edison Company	Stephanie Kenny		Affirmative	N/A
6	Entergy	Julie Hall		None	N/A
6	Evergy	Tiffany Lake	Alan Kloster	Affirmative	N/A
6	FirstEnergy - FirstEnergy Corporation	Stacey Sheehan		Affirmative	N/A
6	Imperial Irrigation District	Diana Torres	Denise Sanchez	Affirmative	N/A
6	Invenergy LLC	Colin Chilcoat		Affirmative	N/A
6	Los Angeles Department of Water and Power	Anton Vu		Abstain	N/A
6	Manitoba Hydro	Brandin Stoesz		Affirmative	N/A
6	Muscatine Power and Water	Nicholas Burns		Affirmative	N/A
6	New York Power Authority	Shelly Dineen		Affirmative	N/A
6	NextEra Energy - Florida Power and Light Co.	Justin Welty		Affirmative	N/A
6	NiSource - Northern Indiana Public Service Co.	Eugene Johnson		Affirmative	N/A
6	Northern California Power Agency	Benjamin Hector	Mason Jones	Negative	N/A
6	OGE Energy - Oklahoma Gas and Electric Co.	Ashley F Stringer		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
6	Omaha Public Power District	Shonda McCain		Affirmative	N/A
6	Platte River Power Authority	Sabrina Martz		None	N/A
6	Portland General Electric Co.	Stefanie Burke		Abstain	N/A
6	Powerex Corporation	Raj Hundal		Abstain	N/A
6	PPL - Louisville Gas and Electric Co.	Linn Oelker		Affirmative	N/A
6	Sacramento Municipal Utility District	Charles Norton	Tim Kelley	Affirmative	N/A
6	Salt River Project	Israel Perez		Affirmative	N/A
6	Santee Cooper	Marty Watson		Affirmative	N/A
6	Seminole Electric Cooperative, Inc.	Bret Galbraith		Negative	N/A
6	Snohomish County PUD No. 1	John Liang		Negative	N/A
6	Southern Company - Southern Company Generation and Energy Marketing	Matthew O'neal		Affirmative	N/A
6	Southern Indiana Gas and Electric Co.	Kati Barr		Affirmative	N/A
6	Tacoma Public Utilities (Tacoma, WA)	Terry Gifford	Jennie Wike	Affirmative	N/A
6	Tennessee Valley Authority	Jeffrey Powell		Negative	N/A
6	WEC Energy Group, Inc.	David Boeshaar		Affirmative	N/A
6	Western Area Power Administration	Jennifer Neville		Affirmative	N/A
6	Xcel Energy, Inc.	Patrick Flaherty		None	N/A
10	Midwest Reliability Organization	Mark Flanary		Affirmative	N/A
10	Northeast Power Coordinating Council	Ruida Shu		Abstain	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
10	ReliabilityFirst	Tremayne Brown	Greg Sorenson	Affirmative	N/A
10	SERC Reliability Corporation	Dave Krueger		Affirmative	N/A
10	Texas Reliability Entity, Inc.	Rachel Coyne		Affirmative	N/A
10	Western Electricity Coordinating Council	Steven Rueckert		Affirmative	N/A

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BALLOT RESULTS

Ballot Name: 2024-01 Rules of Procedure Definitions Alignment (GO and GOP) | Draft 1 GO and GOP Definitions | Implementation Plan FN 2 OT

Voting Start Date: 7/2/2025 11:26:18 AM

Voting End Date: 7/14/2025 8:00:00 PM

Ballot Type: OT

Ballot Activity: FN

Ballot Series: 2

Total # Votes: 245

Total Ballot Pool: 267

Quorum: 91.76

Quorum Established Date: 7/2/2025 1:59:01 PM

Weighted Segment Value: 73.83

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 1	67	1	40	0.784	11	0.216	0	8	8
Segment: 2	6	0.6	3	0.3	3	0.3	0	0	0
Segment: 3	62	1	45	0.818	10	0.182	0	6	1
Segment: 4	14	1	10	0.714	4	0.286	0	0	0
Segment: 5	68	1	36	0.692	16	0.308	0	7	9
Segment: 6	44	1	25	0.694	11	0.306	0	4	4
Segment: 7	0	0	0	0	0	0	0	0	0
Segment: 8	0	0	0	0	0	0	0	0	0

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 9	0	0	0	0	0	0	0	0	0
Segment: 10	6	0.5	5	0.5	0	0	0	1	0
Totals:	267	6.1	164	4.504	55	1.596	0	26	22

BALLOT POOL MEMBERS

Show entries

Search:

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	AEP - AEP Service Corporation	Dennis Sauriol		Affirmative	N/A
1	Allete - Minnesota Power, Inc.	Hillary Creurer		Abstain	N/A
1	Ameren - Ameren Services	Tamara Evey		None	N/A
1	American Transmission Company, LLC	Amy Wilke		None	N/A
1	APS - Arizona Public Service Co.	Daniela Atanasovski		Negative	N/A
1	Associated Electric Cooperative, Inc.	Mark Riley		Affirmative	N/A
1	Avista - Avista Corporation	Mike Magruder		Affirmative	N/A
1	Balancing Authority of Northern California	Kris Kirkegaard	Tim Kelley	Affirmative	N/A
1	BC Hydro and Power Authority	Patricia Robertson		Abstain	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Berkshire Hathaway Energy - MidAmerican Energy Co.	Thomas Breen		Affirmative	N/A
1	Black Hills Corporation	Trevor Rombough		Negative	N/A
1	CenterPoint Energy Houston Electric, LLC	Daniela Hammons		Affirmative	N/A
1	Central Iowa Power Cooperative	Kevin Lyons		Affirmative	N/A
1	City Utilities of Springfield, Missouri	Michael Bowman		None	N/A
1	Colorado Springs Utilities	Corey Walker		Affirmative	N/A
1	Con Ed - Consolidated Edison Co. of New York	Dermot Smyth		Affirmative	N/A
1	Dairyland Power Cooperative	Karrie Schuldt		Affirmative	N/A
1	Dominion - Dominion Virginia Power	Steven Belle		Affirmative	N/A
1	Duke Energy	Katherine Street		Negative	N/A
1	Edison International - Southern California Edison Company	Robert Blackney		Affirmative	N/A
1	Entergy	Brian Lindsey		None	N/A
1	Evergy	Kevin Frick	Alan Kloster	Affirmative	N/A
1	Exelon	Daniel Gacek		Affirmative	N/A
1	FirstEnergy - FirstEnergy Corporation	Theresa Ciancio		Affirmative	N/A
1	Georgia Transmission Corporation	Greg Davis		Affirmative	N/A
1	Glencoe Light and Power Commission	Terry Volkmann		Affirmative	N/A
1	Great River Energy	Gordon Pietsch		None	N/A
1	Hydro-Quebec (HQ)	Nicolas Turcotte	Chantal Mazza	Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	IDACORP - Idaho Power Company	Sean Steffensen		None	N/A
1	Imperial Irrigation District	Jesus Sammy Alcaraz	Denise Sanchez	Affirmative	N/A
1	International Transmission Company Holdings Corporation	Michael Moltane	Allie Gavin	Abstain	N/A
1	JEA	Joseph McClung		Affirmative	N/A
1	Lincoln Electric System	Josh Johnson		Affirmative	N/A
1	Long Island Power Authority	Isidoro Behar		Abstain	N/A
1	Lower Colorado River Authority	Matt Lewis		Abstain	N/A
1	M and A Electric Power Cooperative	William Price		Affirmative	N/A
1	Manitoba Hydro	Nazra Gladu		Affirmative	N/A
1	Minnkota Power Cooperative Inc.	Theresa Allard	Nikki Carson-Marquis	Negative	N/A
1	Muscatine Power and Water	Andrew Kurriger		Affirmative	N/A
1	N.W. Electric Power Cooperative, Inc.	Mark Ramsey		Affirmative	N/A
1	National Grid USA	Jacqueline Ryan		Abstain	N/A
1	Nebraska Public Power District	Jamison Cawley		Affirmative	N/A
1	New York Power Authority	Daniel Valle		Negative	N/A
1	NextEra Energy - Florida Power and Light Co.	Silvia Mitchell		Negative	N/A
1	NiSource - Northern Indiana Public Service Co.	Alison Nickells		Affirmative	N/A
1	Northeast Missouri Electric Power Cooperative	Brett Douglas		Affirmative	N/A
1	OGE Energy - Oklahoma Gas and Electric Co.	Terri Pyle		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Pedernales Electric Cooperative, Inc.	Bradley Collard		None	N/A
1	Platte River Power Authority	Marissa Archie		Affirmative	N/A
1	Portland General Electric Co.	Brooke Jockin		None	N/A
1	PPL Electric Utilities Corporation	Michelle McCartney Longo		Affirmative	N/A
1	Public Utility District No. 1 of Snohomish County	Alyssia Rhoads		Negative	N/A
1	Public Utility District No. 2 of Grant County, Washington	Joanne Anderson		Abstain	N/A
1	Sacramento Municipal Utility District	Wei Shao	Tim Kelley	Affirmative	N/A
1	Salt River Project	Laura Somak		Affirmative	N/A
1	Santee Cooper	Chris Wagner		Affirmative	N/A
1	Sempra - San Diego Gas and Electric	Mohamed Derbas		Affirmative	N/A
1	Southern Company - Southern Company Services, Inc.	Matt Carden		Negative	N/A
1	Sunflower Electric Power Corporation	Paul Mehlhaff		Abstain	N/A
1	Tacoma Public Utilities (Tacoma, WA)	John Merrell	Jennie Wike	Affirmative	N/A
1	Tennessee Valley Authority	David Plumb		Negative	N/A
1	Tri-State G and T Association, Inc.	Donna Wood		Affirmative	N/A
1	TXNM Energy	Lynn Goldstein		Negative	N/A
1	U.S. Bureau of Reclamation	Richard Jackson		Negative	N/A
1	Unisource - Tucson Electric Power Co.	Jessica Cordero		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Western Area Power Administration	Ben Hammer		Affirmative	N/A
1	Xcel Energy, Inc.	Eric Barry		Affirmative	N/A
2	Electric Reliability Council of Texas, Inc.	Kennedy Meier		Negative	N/A
2	ISO New England, Inc.	John Pearson		Affirmative	N/A
2	Midcontinent ISO, Inc.	Kirsten Rowley		Affirmative	N/A
2	New York Independent System Operator	Gregory Campoli		Affirmative	N/A
2	PJM Interconnection, L.L.C.	Thomas Foster	Elizabeth Davis	Negative	N/A
2	Southwest Power Pool, Inc. (RTO)	Joshua Phillips		Negative	N/A
3	AEP	Jodi Yeary		Affirmative	N/A
3	AES - Indianapolis Power and Light Co.	Sing Tay		Negative	N/A
3	Ameren - Ameren Services	David Jendras Sr	Nick Leathers	Affirmative	N/A
3	APS - Arizona Public Service Co.	Jessica Lopez		Negative	N/A
3	Associated Electric Cooperative, Inc.	Todd Bennett		Affirmative	N/A
3	Austin Energy	Lovita Griffin		Affirmative	N/A
3	Avista - Avista Corporation	Robert Follini		Affirmative	N/A
3	BC Hydro and Power Authority	Ming Jiang		Abstain	N/A
3	Berkshire Hathaway Energy - MidAmerican Energy Co.	Amy Key		Affirmative	N/A
3	Black Hills Corporation	Josh Combs		Negative	N/A
3	Bonneville Power Administration	Ron Sporseen		Affirmative	N/A
3	CMS Energy - Consumers Energy Company	Karl Blaszkowski		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	Colorado Springs Utilities	Hillary Dobson		Affirmative	N/A
3	Con Ed - Consolidated Edison Co. of New York	Lincoln Burton		Affirmative	N/A
3	Dominion - Dominion Virginia Power	Victoria Crider		Affirmative	N/A
3	DTE Energy - Detroit Edison Company	Marvin Johnson		Affirmative	N/A
3	Edison International - Southern California Edison Company	Romel Aquino		Affirmative	N/A
3	Energy	James Keele		None	N/A
3	Eergy	Marcus Moor	Alan Kloster	Affirmative	N/A
3	Eversource Energy	Vicki O'Leary		Abstain	N/A
3	Exelon	Kinte Whitehead		Affirmative	N/A
3	FirstEnergy - FirstEnergy Corporation	Aaron Ghodooshim		Affirmative	N/A
3	Georgia System Operations Corporation	Scott McGough		Affirmative	N/A
3	Great River Energy	Michael Brytowski		Affirmative	N/A
3	Imperial Irrigation District	George Kirschner	Denise Sanchez	Affirmative	N/A
3	JEA	Marilyn Williams		Affirmative	N/A
3	KAMO Electric Cooperative	Tony Gott		Affirmative	N/A
3	Lincoln Electric System	Sam Christensen		Affirmative	N/A
3	Los Angeles Department of Water and Power	Fausto Serratos		Abstain	N/A
3	M and A Electric Power Cooperative	Gary Dollins		Affirmative	N/A
3	Manitoba Hydro	Mike Smith		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	MGE Energy - Madison Gas and Electric Co.	Benjamin Widder		Affirmative	N/A
3	Muscatine Power and Water	Seth Shoemaker		Affirmative	N/A
3	National Grid USA	Brian Shanahan		Abstain	N/A
3	Nebraska Public Power District	Tony Eddleman		Affirmative	N/A
3	New York Power Authority	Richard Machado		Negative	N/A
3	NextEra Energy - Florida Power and Light Co.	Karen Demos		Affirmative	N/A
3	NiSource - Northern Indiana Public Service Co.	Steven Taddeucci		Affirmative	N/A
3	North Carolina Electric Membership Corporation	Tyler Bellomy	Scott Brame	Affirmative	N/A
3	Northeast Missouri Electric Power Cooperative	Skyler Wiegmann		Affirmative	N/A
3	Northern California Power Agency	Michael Whitney	Mason Jones	Negative	N/A
3	NW Electric Power Cooperative, Inc.	Heath Henry		Affirmative	N/A
3	OGE Energy - Oklahoma Gas and Electric Co.	Donald Hargrove		Affirmative	N/A
3	Omaha Public Power District	David Heins		Affirmative	N/A
3	Platte River Power Authority	Richard Kiess		Affirmative	N/A
3	Portland General Electric Co.	Mayra Franco		Abstain	N/A
3	PPL - Louisville Gas and Electric Co.	James Frank		Affirmative	N/A
3	Sacramento Municipal Utility District	Nicole Looney	Tim Kelley	Affirmative	N/A
3	Salt River Project	Mathew Weber		Affirmative	N/A
3	Santee Cooper	Vicky Budreau		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	Seminole Electric Cooperative, Inc.	Usama Tahir		Negative	N/A
3	Sempra - San Diego Gas and Electric	Bryan Bennett		Affirmative	N/A
3	Sho-Me Power Electric Cooperative	Jarrold Murdaugh		Affirmative	N/A
3	Snohomish County PUD No. 1	Holly Chaney		Negative	N/A
3	Southern Company - Alabama Power Company	Joel Dembowski		Negative	N/A
3	Southern Indiana Gas and Electric Co.	Ryan Snyder		Affirmative	N/A
3	Tacoma Public Utilities (Tacoma, WA)	John Nierenberg	Jennie Wike	Affirmative	N/A
3	Tennessee Valley Authority	Ian Grant		Negative	N/A
3	Tri-State G and T Association, Inc.	Amanda Skubal		Affirmative	N/A
3	TXNM Energy	Scott Thompson		Negative	N/A
3	WEC Energy Group, Inc.	Christine Kane		Affirmative	N/A
3	Xcel Energy, Inc.	Nicholas Friebe	Joseph Gatten	Abstain	N/A
4	Austin Energy	Tony Hua		Affirmative	N/A
4	City Utilities of Springfield, Missouri	Jerry Bradshaw		Negative	N/A
4	CMS Energy - Consumers Energy Company	Aric Root		Affirmative	N/A
4	FirstEnergy - FirstEnergy Corporation	Mark Garza		Affirmative	N/A
4	Georgia System Operations Corporation	Katrina Lyons		Affirmative	N/A
4	MGE Energy - Madison Gas and Electric Co.	Ray Mangiulli		Affirmative	N/A
4	North Carolina Electric Membership Corporation	Richard McCall	Scott Brame	Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
4	Northern California Power Agency	Marty Hostler	Mason Jones	Negative	N/A
4	Public Utility District No. 1 of Snohomish County	John D. Martinsen		Negative	N/A
4	Sacramento Municipal Utility District	Foung Mua	Tim Kelley	Affirmative	N/A
4	Tacoma Public Utilities (Tacoma, WA)	Hien Ho	Jennie Wike	Affirmative	N/A
4	Utility Services, Inc.	Carver Powers		Affirmative	N/A
4	WEC Energy Group, Inc.	Candace Morakinyo		Affirmative	N/A
4	Western Power Pool	Kevin Conway		Negative	N/A
5	AEP	Thomas Foltz		Affirmative	N/A
5	AES - AES Corporation	Ruchi Shah		Negative	N/A
5	Ameren - Ameren Missouri	Sam Dwyer		Affirmative	N/A
5	American Municipal Power	Amy Ritts		Abstain	N/A
5	APS - Arizona Public Service Co.	Andrew Smith		Negative	N/A
5	Austin Energy	Michael Dillard		Affirmative	N/A
5	BC Hydro and Power Authority	Vijay Raghunathan		Abstain	N/A
5	Berkshire Hathaway - NV Energy	Dwanique Spiller		Affirmative	N/A
5	Black Hills Corporation	Sheila Suurmeier		Negative	N/A
5	Bonneville Power Administration	Milli Chennell		Affirmative	N/A
5	Calpine Corporation	Whitney Wallace		Affirmative	N/A
5	Choctaw Generation Limited Partnership, LLLP	Rob Watson		Negative	N/A
5	CMS Energy - Consumers Energy Company	David Greyerblehl		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Colorado Springs Utilities	Jeffrey Icke		Affirmative	N/A
5	Con Ed - Consolidated Edison Co. of New York	Michelle Pagano		Affirmative	N/A
5	Constellation	Alison MacKellar		Negative	N/A
5	Dairyland Power Cooperative	Tommy Drea		Affirmative	N/A
5	Dominion - Dominion Resources, Inc.	Barbara Marion		Affirmative	N/A
5	DTE Energy	George Goddard		None	N/A
5	Duke Energy	Dale Goodwine		Negative	N/A
5	EDF Renewable Energy	Steven Sconce		Negative	N/A
5	Edison International - Southern California Edison Company	Selene Willis		Affirmative	N/A
5	Entergy - Entergy Services, Inc.	Gail Golden		None	N/A
5	Evergy	Jeremy Harris	Alan Kloster	Affirmative	N/A
5	FirstEnergy - FirstEnergy Corporation	Matthew Augustin		Affirmative	N/A
5	Greybeard Compliance Services, LLC	Mike Gabriel		None	N/A
5	Grid Strategies LLC	Michael Goggin		Negative	N/A
5	Hydro-Quebec (HQ)	Junji Yamaguchi	Chantal Mazza	Affirmative	N/A
5	Imperial Irrigation District	Tino Zaragoza	Denise Sanchez	Affirmative	N/A
5	Invenergy LLC	Rhonda Jones		None	N/A
5	JEA	John Babik		Affirmative	N/A
5	Leeward Renewable Energy	Rob Robertson		None	N/A
5	Lincoln Electric System	Brittany Millard		Affirmative	N/A
5	Lower Colorado River Authority	Joseph Scott		Abstain	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Manitoba Hydro	Kristy-Lee Young		Affirmative	N/A
5	Muscatine Power and Water	Chance Back		Affirmative	N/A
5	National Grid USA	Robin Berry		Abstain	N/A
5	NB Power Corporation - New Brunswick Power Transmission Corporation	David Melanson		Abstain	N/A
5	Nebraska Public Power District	Ronald Bender		Affirmative	N/A
5	New York Power Authority	Zahid Qayyum		Negative	N/A
5	NextEra Energy	Richard Vendetti		Affirmative	N/A
5	NiSource - Northern Indiana Public Service Co.	Kathryn Tackett		Affirmative	N/A
5	North Carolina Electric Membership Corporation	Reid Cashion	Scott Brame	Affirmative	N/A
5	Northern California Power Agency	Jeremy Lawson	Mason Jones	Negative	N/A
5	OGE Energy - Oklahoma Gas and Electric Co.	Patrick Wells		Affirmative	N/A
5	Oglethorpe Power Corporation	Donna Johnson		Affirmative	N/A
5	Oklahoma Municipal Power Authority	Patrick Tuttle		Affirmative	N/A
5	Omaha Public Power District	Kayleigh Wilkerson		None	N/A
5	Orsted Americas	Keith Smith		None	N/A
5	Pacific Gas and Electric Company	Tyler Brun	Bob Cardle	Affirmative	N/A
5	Platte River Power Authority	Jon Osell	Jennifer Sieg	Affirmative	N/A
5	Portland General Electric Co.	Ryan Olson		Abstain	N/A
5	PPL - Louisville Gas and Electric Co.	Julie Hostrander		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Public Utility District No. 1 of Snohomish County	Becky Burden		Negative	N/A
5	Sacramento Municipal Utility District	Ryder Couch	Tim Kelley	Affirmative	N/A
5	Salt River Project	Matthew Jaramilla		Affirmative	N/A
5	Santee Cooper	Carey Salisbury		Affirmative	N/A
5	Seminole Electric Cooperative, Inc.	Melanie Wong		Negative	N/A
5	Sempra - San Diego Gas and Electric	Jennifer Wright		Affirmative	N/A
5	Southern Company - Southern Company Generation	Leslie Burke		Negative	N/A
5	Southern Indiana Gas and Electric Co.	Larry Rogers		Affirmative	N/A
5	Tallahassee Electric (City of Tallahassee, FL)	Karen Weaver		Abstain	N/A
5	Tennessee Valley Authority	Darren Boehm		Negative	N/A
5	TransAlta Corporation	Ashley Scheelar		Negative	N/A
5	Tri-State G and T Association, Inc.	Sergio Banuelos		None	N/A
5	U.S. Bureau of Reclamation	Wendy Kalidass		Negative	N/A
5	WEC Energy Group, Inc.	Catherine Doyle		None	N/A
5	Xcel Energy, Inc.	Gerry Huitt		Affirmative	N/A
6	AEP	Randy Calhoun		Affirmative	N/A
6	Ameren - Ameren Services	Robert Quinlivan		Affirmative	N/A
6	APS - Arizona Public Service Co.	Marcus Bortman		Negative	N/A
6	Associated Electric Cooperative, Inc.	Brian Ackermann		Affirmative	N/A
6	Austin Energy	Imane Mrini		None	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
6	Berkshire Hathaway - PacifiCorp	Lindsay Wickizer		Affirmative	N/A
6	Black Hills Corporation	Josh Schumacher		Negative	N/A
6	Bonneville Power Administration	Tanner Brier		Affirmative	N/A
6	Cleco Corporation	Robert Hirschak		Abstain	N/A
6	Con Ed - Consolidated Edison Co. of New York	Jason Chandler		Affirmative	N/A
6	Constellation	Kimberly Turco		Negative	N/A
6	Dominion - Dominion Resources, Inc.	Bill Garvey		Affirmative	N/A
6	Duke Energy	John Sturgeon		Negative	N/A
6	Edison International - Southern California Edison Company	Stephanie Kenny		Affirmative	N/A
6	Entergy	Julie Hall		None	N/A
6	Evergy	Tiffany Lake	Alan Kloster	Affirmative	N/A
6	FirstEnergy - FirstEnergy Corporation	Stacey Sheehan		Affirmative	N/A
6	Imperial Irrigation District	Diana Torres	Denise Sanchez	Affirmative	N/A
6	Invenergy LLC	Colin Chilcoat		Affirmative	N/A
6	Los Angeles Department of Water and Power	Anton Vu		Abstain	N/A
6	Manitoba Hydro	Brandin Stoesz		Affirmative	N/A
6	Muscatine Power and Water	Nicholas Burns		Affirmative	N/A
6	New York Power Authority	Shelly Dineen		Negative	N/A
6	NextEra Energy - Florida Power and Light Co.	Justin Welty		Negative	N/A
6	NiSource - Northern Indiana Public Service Co.	Eugene Johnson		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
6	Northern California Power Agency	Benjamin Hector	Mason Jones	Negative	N/A
6	OGE Energy - Oklahoma Gas and Electric Co.	Ashley F Stringer		Affirmative	N/A
6	Omaha Public Power District	Shonda McCain		Affirmative	N/A
6	Platte River Power Authority	Sabrina Martz		None	N/A
6	Portland General Electric Co.	Stefanie Burke		Abstain	N/A
6	Powerex Corporation	Raj Hundal		Abstain	N/A
6	PPL - Louisville Gas and Electric Co.	Linn Oelker		Affirmative	N/A
6	Sacramento Municipal Utility District	Charles Norton	Tim Kelley	Affirmative	N/A
6	Salt River Project	Israel Perez		Affirmative	N/A
6	Santee Cooper	Marty Watson		Affirmative	N/A
6	Seminole Electric Cooperative, Inc.	Bret Galbraith		Negative	N/A
6	Snohomish County PUD No. 1	John Liang		Negative	N/A
6	Southern Company - Southern Company Generation and Energy Marketing	Matthew O'neal		Negative	N/A
6	Southern Indiana Gas and Electric Co.	Kati Barr		Affirmative	N/A
6	Tacoma Public Utilities (Tacoma, WA)	Terry Gifford	Jennie Wike	Affirmative	N/A
6	Tennessee Valley Authority	Jeffrey Powell		Negative	N/A
6	WEC Energy Group, Inc.	David Boeshaar		Affirmative	N/A
6	Western Area Power Administration	Jennifer Neville		Affirmative	N/A
6	Xcel Energy, Inc.	Patrick Flaherty		None	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
10	Midwest Reliability Organization	Mark Flanary		Affirmative	N/A
10	Northeast Power Coordinating Council	Ruida Shu		Abstain	N/A
10	ReliabilityFirst	Tremayne Brown	Greg Sorenson	Affirmative	N/A
10	SERC Reliability Corporation	Dave Krueger		Affirmative	N/A
10	Texas Reliability Entity, Inc.	Rachel Coyne		Affirmative	N/A
10	Western Electricity Coordinating Council	Steven Rueckert		Affirmative	N/A

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Exhibit E
Standard Drafting Team Roster, Project 2024-01 Rules of Procedure Definitions Alignment
(Generator Owner and Generator Operator)

Drafting Team Roster

Project 2024-01 Rules of Procedure Definitions Alignment (GO-GOP)

	Name	Entity
Chair	Kristina Marriott	Miller Bros Solar
Vice Chair	Dane Rogers	Oklahoma Gas and Electric Company
Member	David Lemmons	Greybeard Compliance Services
	Colten Mitchell	Indiana Municipal Power Agency
	Libin Varghese	NYPA
	Richard Vendetti	NextEra Energy Resources or FPL
	Todd Bennett	Associated Electric Cooperative, Inc.
	John Helme	Utility Services of Vermont
	Steve Casey	Arevon Energy
PMOS Liaison	Terri Pyle	Oklahoma Gas and Electric
	Ron Sporseen	Bonneville Power Administration
NERC Staff	Jessica Harris, Standards Developer	North American Electric Reliability Corporation
	Alain-Christian Rigaud, Counsel	North American Electric Reliability Corporation