

## 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	
<p>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.</p>	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	No
Document Name	
Comment	
<p>Reclamation does not own any non-BES IBR resources. However, Reclamation does not agree adding IBR resources that do not meet the BES definition.</p>	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1	
Answer	No
Document Name	
Comment	
<p>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.</p>	
Likes 0	

Dislikes	0
<b>Response</b>	
<b>Alyssia Rhoads - Public Utility District No. 1 of Snohomish County - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>“Connected through a system designed primarily for delivery such capacity to [...] voltage greater than or equal to 60kV”</p> <p>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.</p> <p>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.</p> <p>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.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Marcus Bortman - APS - Arizona Public Service Co. - 6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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:</p> <p>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).</p> <p>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</p>	

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	
<b>Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF</b>	
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	
<b>Josh Schumacher - Black Hills Corporation - 6, Group Name</b> 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	
<b>John Pearson - ISO New England, Inc. - 2</b>	
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	
<b>Kimberly Turco - Constellation - 6</b>	
Answer	Yes
Document Name	
Comment	
<p><i>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.</i></p> <p>Kimberly Turco on behalf of Constellation Segments 5 and 6</p>	
Likes 0	
Dislikes 0	
Response	
<b>Alison MacKellar - Constellation - 5</b>	
Answer	Yes
Document Name	
Comment	
<p>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.</p> <p>Alison Mackellar on behalf of Constellation Segments 5 and 6</p>	

Likes	0
Dislikes	0
<b>Response</b>	
<b>Scott Thompson - TXNM Energy - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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
<b>Response</b>	
<b>Alan Wahlstrom - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
SPP has collaborated with ISO/RTO Council Standards Review Committee (SRC) and support their comments	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Ashley Scheelar - TransAlta Corporation - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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



<b>Response</b>	
<b>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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Bob Cardle - Bob Cardle On Behalf of: Tyler Brun, Pacific Gas and Electric Company, 3, 1, 5; - Bob Cardle</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
<b>Answer</b>	Yes

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

<b>Response</b>	
<b>Karen Demos - NextEra Energy - Florida Power and Light Co. - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes    0	
Dislikes    0	
<b>Response</b>	
<b>Mohamad Elhusseini - DTE Energy - Detroit Edison Company - 5, Group Name DTE Energy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes    0	
Dislikes    0	
<b>Response</b>	
<b>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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes    0	
Dislikes    0	
<b>Response</b>	
<b>Carver Powers - Utility Services, Inc. - 4</b>	

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
<b>Response</b>	
<b>Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Thomas Breen - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Amy Key - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3</b>	

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
<b>Response</b>	
<b>Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name</b> ACES Collaborators	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Mike Magruder - Avista - Avista Corporation - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Ruida Shu - Northeast Power Coordinating Council - 10, Group Name</b> NPCC RSC	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>James Merlo - NAGF - NA - Not Applicable - NA - Not Applicable</b>	
<b>Answer</b>	Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Joshua Phillips - Southwest Power Pool, Inc. (RTO) - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	



Dislikes	0
<b>Response</b>	
<b>Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name</b> BC Hydro	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>BC Hydro appreciates the opportunity to review and offers the following comments and suggestions.</p> <p>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 ...”</p> <p>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.</p> <p>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.</p> <p>BC Hydro requests that the drafting team clarifies this and revise the proposed definitions to reflect this understanding as appropriate.</p> <p>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.</p>	
Likes	0
Dislikes	0
<b>Response</b>	

**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
<b>Response</b>	
<b>Alan Wahlstrom - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
SPP has collabrated with ISO/RTO Council Standards Review Committee (SRC) and support their comments	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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
<b>Response</b>	
<b>Joshua Phillips - Southwest Power Pool, Inc. (RTO) - 2, Group Name ISO/RTO Council Standards Review Committee (SRC)</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
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 revision<sup>2</sup> 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

<b>Alison MacKellar - Constellation - 5</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p> <p>Alison Mackellar on behalf of Constellation Segments 5 and 6</p>	
Likes    0	
Dislikes    0	
<b>Response</b>	
<b>James Merlo - NAGF - NA - Not Applicable - NA - Not Applicable</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>The NAGF would like to offer the following comments:</p> <p>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.</p> <p>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.</p> <p>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 complaint 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.</p> <p>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.).</p>	
Likes    0	
Dislikes    0	
<b>Response</b>	
<b>Marcus Bortman - APS - Arizona Public Service Co. - 6</b>	

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<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>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>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	
<p>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.</p> <p>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.</p>	
Likes 0	
Dislikes 0	
Response	
Kimberly Turco - Constellation - 6	
Answer	No
Document Name	
Comment	
<p><i>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.</i></p> <p>Kimberly Turco on behalf of Constellation Segments 5 and 6</p>	
Likes 0	

Dislikes	0
<b>Response</b>	
<b>John Pearson - ISO New England, Inc. - 2</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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:</p> <p>These Reliability Standards are as follows:</p> <ul style="list-style-type: none"> <li>&amp;bull; BAL-001-TRE-2</li> <li>&amp;bull; EOP-004-4</li> <li>&amp;bull; IRO-010-5</li> <li>&amp;bull; MOD-032-1</li> <li>&amp;bull; PRC-012-2</li> <li>&amp;bull; PRC-017-1</li> <li>&amp;bull; TOP-003-6.1</li> <li>&amp;bull; VAR-001-5</li> <li>&amp;bull; VAR-002-4.1</li> </ul>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Alyssia Rhoads - Public Utility District No. 1 of Snohomish County - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>The definition needs work for clarity on projects primarily used for load mitigation behind the meter.</p>	
Likes	0



Dislikes	0
<b>Response</b>	
<b>Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name</b> Southern Company	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Ben Hammer - Western Area Power Administration - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p> <p>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.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Zahid Qayyum - New York Power Authority - 5</b>	

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<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	
<b>Response</b>	
<b>Richard Jackson - U.S. Bureau of Reclamation - 1</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<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	
<b>Response</b>	
<b>Josh Schumacher - Black Hills Corporation - 6, Group Name Black Hills Corporation Segments 1, 3, 5, 6</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	

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 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?

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
Dislikes    0	

Response

Kevin Conway - Western Power Pool - 4

Answer	No
Document Name	

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		
<p>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.</p> <p>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.</p>		
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		
<p>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.</p> <p>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.</p> <p>If each standard is modified, any standard remaining unmodified will not be applicable to category 2 GO/GOP.</p>		
Likes	0	
Dislikes	0	
Response		

<b>Amy Key - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>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."</p> <p>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.</p>	
Likes    0	
Dislikes    0	
<b>Response</b>	
<b>Chantal Mazza - Chantal Mazza On Behalf of: Junji Yamaguchi, Hydro-Quebec (HQ), 1, 5; Nicolas Turcotte, Hydro-Quebec (HQ), 1, 5; - Chantal Mazza</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p> <p>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.</p>	
Likes    0	
Dislikes    0	
<b>Response</b>	

<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
FirstEnergy supports the Implementation Plan.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Mike Magruder - Avista - Avista Corporation - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	



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	
<b>Response</b>	
<b>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</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Mohamad Elhusseini - DTE Energy - Detroit Edison Company - 5, Group Name DTE Energy</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
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

<b>Document Name</b>	
<b>Comment</b>	
Likes    0	
Dislikes    0	
<b>Response</b>	
<b>Thomas Foltz - AEP - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes    0	
Dislikes    0	
<b>Response</b>	
<b>Ronald Hoover - Bonneville Power Administration - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes    0	
Dislikes    0	
<b>Response</b>	
<b>Colleen Campbell - Proenergy Services - 6 - Texas RE</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes    0	
Dislikes    0	

Response	
<b>Michael Goggin - Grid Strategies LLC - 5</b>	
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	
<b>Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro</b>	
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

<b>Response</b>	
<b>Duane Franke - Manitoba Hydro - 1,3,5,6 - MRO</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	
Likes    1	Adam Burlock, N/A, Burlock Adam
Dislikes    0	
<b>Response</b>	
<b>Kevin Conway - Western Power Pool - 4</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	
Likes    1	Adam Burlock, N/A, Burlock Adam
Dislikes    0	
<b>Response</b>	
<b>Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>FirstEnergy has no additional comments.</p>	
Likes    0	
Dislikes    0	



Response	
<b>Donna Wood - Tri-State G and T Association, Inc. - 1</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
NA	
Likes 0	
Dislikes 0	
Response	
<b>Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
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	
<b>Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
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
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Dislikes	0	
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## 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	
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Dislikes	0	
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## 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	
<p>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.”</p> <p>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.</p> <p>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.</p> <p>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.</p>	
Likes	0
Dislikes	0
Response	
<p><b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b></p>	
Answer	
Document Name	
Comment	
<p>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?</p>	

Likes	0
Dislikes	0
<b>Response</b>	
<b>Ben Hammer - Western Area Power Administration - 1</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<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
<b>Response</b>	
<b>Amy Key - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<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
<b>Response</b>	
<b>Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
No Additional Comments	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Usama Tahir - Seminole Electric Cooperative, Inc. - 3</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p> <p>How will community-owned community solar be incorporated into these definitions? Per the U.S. Department of Energy’s document at this link (<a href="https://docs.nrel.gov/docs/fy23osti/86210.pdf">https://docs.nrel.gov/docs/fy23osti/86210.pdf</a>), 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?</p> <p>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?</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Melanie Wong - Seminole Electric Cooperative, Inc. - 5</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	

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
<b>Response</b>	
<b>Marcus Bortman - APS - Arizona Public Service Co. - 6</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
AZPS has no additional comments at this time.	
Likes	0
Dislikes	0
<b>Response</b>	
<b>James Merlo - NAGF - NA - Not Applicable - NA - Not Applicable</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>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?</p> <p>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.</p> <p>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.</p>	
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:	
<ul style="list-style-type: none"><li>we do not believe it has addressed the industry concern regarding separately defining the new entities as GO/GOP Category 2.</li><li>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 &amp; PRC-030-1 which list "Facilities" in the "Applicability" section as "BES Inverter-Based Resources" and "Non-BES Inverter-Based Resources..."</li><li>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."</li></ul>	
Likes 0	
Dislikes 0	
Response	

<b>Joshua Phillips - Southwest Power Pool, Inc. (RTO) - 2, Group Name</b> ISO/RTO Council Standards Review Committee (SRC)	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>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.</p>	
Likes    0	
Dislikes    0	
<b>Response</b>	
<b>Anna Martinson - MRO - 1,2,3,4,5,6 - MRO, Group Name</b> MRO Group	
<b>Answer</b>	
<b>Document Name</b>	<a href="#">2024-01_Unofficial_Comment_Form_GO GOP Definition Alignment NSRF final.docx</a>
<b>Comment</b>	
<p>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.</p>	
Likes    1	Adam Burlock, N/A, Burlock Adam
Dislikes    0	
<b>Response</b>	
<b>Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
<p>ERCOT joins the comments submitted by the IRC SRC and adopts them as its own.</p>	
Likes    0	

Dislikes	0
Response	
Alan Wahlstrom - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP	
Answer	
Document Name	
Comment	
SPP has collabrated 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	
<p>The definitions are still not clear and the implementation plan is incomplete.</p> <p>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.</p> <p>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.</p> <p>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.</p>	

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	
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Dislikes	0	
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<b>Response</b>
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