

## Standard Authorization Request (SAR)

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

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

Requested information			
SAR Title:	PRC-002-2 Disturbance Monitoring and Reporting Requirements		
Date Submitted:	June 10, 2020 (Revised on November 16, 2021 and April 5, 2023)		
SAR Requester			
Name:	Allen Shriver, Chair Jeffery Billo, Vice Chair Revised by Project 2021-04 SAR Drafting Team		
Organization:	Inverter-Based Resource Performance Task Force (IRPTF)		
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SAR Type (Check as many as apply)			
<input checked="" type="checkbox"/>	New Standard	<input type="checkbox"/>	Imminent Action/ Confidential Issue (SPM Section 10)
<input checked="" type="checkbox"/>	Revision to Existing Standard	<input type="checkbox"/>	Variance development or revision
<input type="checkbox"/>	Add, Modify or Retire a Glossary Term	<input type="checkbox"/>	Other (Please specify)
<input type="checkbox"/>	Withdraw/retire an Existing Standard		
Justification for this proposed standard development project (Check all that apply to help NERC prioritize development)			
<input type="checkbox"/>	Regulatory Initiation	<input checked="" type="checkbox"/>	NERC Standing Committee Identified
<input type="checkbox"/>	Emerging Risk (Reliability Issues Steering Committee) Identified	<input type="checkbox"/>	Enhanced Periodic Review Initiated
<input type="checkbox"/>	Reliability Standard Development Plan	<input checked="" type="checkbox"/>	Industry Stakeholder Identified
Industry Need (What Bulk Electric System (BES) reliability benefit does the proposed project provide?):			
<p>The NERC Inverter-based Resource Performance Task Force (IRPTF) undertook an effort to perform a comprehensive review of all NERC Reliability Standards to determine if there were any potential gaps or improvements based on the work and findings of the IRPTF. The IRPTF identified several issues as part of this effort and documented its findings and recommendations in a white paper. The "IRPTF Review of NERC Reliability Standards White Paper" was approved by the Operating Committee and the Planning Committee in March 2020. Among the findings noted in the white paper, the IRPTF identified issues with PRC-002-2 that should be addressed.</p> <p>The purpose of PRC-002-2 is to have adequate data available to facilitate analysis of BES disturbances. Requirements R1 and R5 specify where sequence of events recording (SER) and fault recording (FR)</p>			

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data, and where dynamic Disturbance recording (DDR) data, respectively, are required in the Bulk Electric System (BES).

Requirements R1 and R5 are written with a focus on synchronous machine dominated systems with periodic review of monitoring equipment needs for the system. The BES elements with short circuit MVA in the top 20% are typically elements at baseload generating plants with multiple generating units or BES elements within a heavily meshed transmission network usually close to large load centers. Inverter-based resources (IBRs) do not contribute much fault current and are usually interconnected in remote parts of the system. As such, the short circuit MVA for the point of interconnection (POI) bus and nearby BES buses is not expected to be in the top 20%. Hence, BES buses near these resources are more likely to be omitted from requiring SER and FR data monitoring. In addition, most IBRs do not meet the nameplate rating criteria outlined in Requirement R5. With increasing penetration of IBRs, it is important that some of these resources and nearby BES elements are monitored with DDR and SER/FR devices.

Recent disturbance analyses of events involving IBRs including the Blue Cut Fire and Canyon 2 Fire have demonstrated the lack of disturbance monitoring data available from these facilities and nearby BES buses to adequately determine the causes and effects of their behavior. None of the IBRs involved in these two events met the size criteria stated in PRC-002-2 to be required to have disturbance monitoring. Additionally, none of the buses near the IBRs met the criteria in Requirement R1 for being required to have SER and FR devices since the IBRs inherently produce very little fault current. This led to difficulty in adequately assessing the events.

With the changing resource mix and increasing penetration of IBRs, PRC-002-2 does not serve its intended purpose adequately. To the extent that the standard is already requiring monitoring devices and periodic assessments, the location requirements and associated periodic assessments need to be reconsidered. This is necessary so that required data is available for the purposes of post-mortem event analysis and identifying root causes of large system disturbances.

In lieu of revising the latest PRC-002, the standard drafting team may consider creating a new standard to address needs identified in this SAR due to the primary audience being IBR Generator Owners and the fact that monitoring and respective technical requirements for IBRs may be significantly different from those for synchronous machines or transmission switching stations. The primary objective of this SAR is to not actually change existing requirements but instead add monitoring requirements for IBRs.

If the new standard is developed to address needs identified in this SAR, minimal changes to PRC-002 may still be necessary to avoid duplication of requirements. Review PRC-002 and make revisions as necessary to align with the new standard.

**Purpose or Goal (How does this proposed project provide the reliability-related benefit described above?):**

This SAR proposes to revise PRC-002-2 or create a new standard to address gaps within the existing standard. The goal is to ensure adequate data is available and periodically assessed to facilitate the

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analysis of BES disturbances, including in areas of the Bulk Power System (BPS) that may not be covered by the existing requirements.
<b>Project Scope (Define the parameters of the proposed project):</b>
The proposed scope of this project is as follows: <ol style="list-style-type: none"> <li>a. Consider ways to ensure that the identification and periodic assessment of BES and/or BPS buses for which SER and FR data is required provides adequate monitoring of BES Disturbances. This may include updates to supplemental information such as the previously provided “Median Method Excel Workbook”.</li> <li>b. Consider ways to ensure that the identification and periodic assessment of BES and/or BPS Elements for which DDR data is required provides adequate monitoring of BES disturbances.</li> <li>c. Consider other manners in which to add to, modify or clarify the existing requirements to ensure adequate monitoring of BES disturbances. This may include creating new requirements or a standard.</li> <li>d. Consider proposed IEEE P2800 monitoring requirements and NERC Odessa Disturbance Report recommendations.</li> </ol>
<b>Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to execute the project. If you propose a new or substantially revised Reliability Standard or definition, provide: (1) a technical justification<sup>1</sup> which includes a discussion of the reliability-related benefits of developing a new or revised Reliability Standard or definition, and (2) a technical foundation document (e.g., research paper) to guide development of the Standard or definition):</b>
Per Requirement R1 (which uses criteria outlined in Attachment 1), Sequence of Event Recording (SER) and Fault Recording (FR) devices are required at BES buses with high short circuit MVA values. The methodology identifies the top 20 percent of BES buses with highest short circuit MVA values and requires a subset of these buses to be monitored for SER and FR data.
However, BES elements with short circuit MVA in the top 20% are typically elements at baseload generating plants with multiple generating units or BES elements within a heavily meshed transmission network usually close to large load centers. IBRs do not contribute much fault current and are usually interconnected in remote parts of the system. As such, the short circuit MVA for the point of interconnection (POI) bus and nearby BES buses is not expected to be in the top 20%. Hence, BES buses near these resources are more likely to be omitted from requiring SER and FR data monitoring, though it is possible that monitoring in these areas is needed for disturbance analysis, as was the case in the Blue Cut Fire and Canyon 2 Fire events.
Requirement R5, identifies BES locations based on a size criteria for generating resources and other critical elements such as HVDC, IROLs and elements of UVLS program, for which Dynamic Disturbance Recording (DDR) data is required. In regard to generation resources, it includes requirements for monitoring at sites with either gross individual nameplate rating of greater than or equal to 500 MVA or

<sup>1</sup> The NERC Rules of Procedure require a technical justification for new or substantially revised Reliability Standards. Please attach pertinent information to this form before submittal to NERC.

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gross individual nameplate rating greater than or equal to 300 MVA where gross plant/facility aggregate nameplate rating is greater than or equal to 1000 MVA.
However, most IBRs do not meet the nameplate rating criteria outlined in Requirement R5. With increasing penetration of IBRs, it is important that some of these resources and nearby BES elements are monitored with DDR devices to ensure adequate coverage for disturbance analysis while balancing cost impacts.
Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):
The SAR proposes to modify PRC-002-2 requirements or create a new standard. The cost impact is unknown, however, the cost of disturbance monitoring hardware is approximately \$50,000 to \$100,000 per installation if the existing onsite equipment is not already set up for monitoring and storage.
Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):
IBRs contribute very little short circuit MVA and are typically smaller in aggregate nameplate rating when compared to legacy synchronous resources. The criteria for selecting disturbance monitoring locations should take this into account.
To assist the NERC Standards Committee in appointing a drafting team with the appropriate members, please indicate to which Functional Entities the proposed standard(s) should apply (e.g., Transmission Operator, Reliability Coordinator, etc. See the most recent version of the NERC Functional Model for definitions):
Planning Coordinator, Reliability Coordinator, Generator Owner, Transmission Owner
Do you know of any consensus building activities <sup>2</sup> in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.
This issue was captured in the “IRPTF Review of NERC Reliability Standards White Paper” which was approved by the Operating Committee and the Planning Committee. Additionally, the IRPTF produced “BPS-Connected Inverter-Based Resource Performance”(see Chapter 6) and “Improvements to Interconnection Requirements for BPS-Connected Inverter-Based Resources” reliability guidelines touch on monitoring considerations for IBRs.
Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so, which standard(s) or project number(s)?
N/A
Are there alternatives (e.g., guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives.
The IRPTF did not identify any alternatives since there is a gap in PRC-002-2.

<sup>2</sup> Consensus building activities are occasionally conducted by NERC and/or project review teams. They typically are conducted to obtain industry inputs prior to proposing any standard development project to revise, or develop a standard or definition.

<b>Reliability Principles</b>	
Does this proposed standard development project support at least one of the following Reliability Principles ( <a href="#">Reliability Interface Principles</a> )? Please check all those that apply.	
<input type="checkbox"/>	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input type="checkbox"/>	2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input checked="" type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.
<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.
<input type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
<input type="checkbox"/>	8. Bulk power systems shall be protected from malicious physical or cyber attacks.

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

<b>Identified Existing or Potential Regional or Interconnection Variances</b>	
Region(s)/ Interconnection	Explanation
None	N/A

## For Use by NERC Only

SAR Status Tracking (Check off as appropriate).	
<input type="checkbox"/> Draft SAR reviewed by NERC Staff	<input type="checkbox"/> Final SAR endorsed by the SC
<input type="checkbox"/> Draft SAR presented to SC for acceptance	<input type="checkbox"/> SAR assigned a Standards Project by NERC
<input type="checkbox"/> DRAFT SAR approved for posting by the SC	<input type="checkbox"/> SAR denied or proposed as Guidance document

**Version History**

Version	Date	Owner	Change Tracking
1	June 3, 2013		Revised
1	August 29, 2014	Standards Information Staff	Updated template
2	January 18, 2017	Standards Information Staff	Revised
2	June 28, 2017	Standards Information Staff	Updated template
3	February 22, 2019	Standards Information Staff	Added instructions to submit via Help Desk
4	February 25, 2020	Standards Information Staff	Updated template footer