

Project 2022-02 Uniform Modeling Framework for IBR

Action

- Approve the following waiver of provisions of the Standard Processes Manual (SPM) for Project 2022-02 Uniform Modeling Framework for IBR:
 - Initial formal comment and ballot period reduced from 45 calendar days to as few as 30 calendar days, with ballot pools formed in the first 10 calendar days and initial ballot and non-binding poll of Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) conducted during the last 10 calendar days of the comment period. (Sections 4.7, 4.9)
 - Additional formal comment and ballot period (s) reduced from 45 calendar days to as few as 15 calendar days, with ballot(s) conducted during the last 10 calendar days of the comment period. (Section 4.12)
 - Final ballot period reduced from 10 calendar days to 5 calendar days. (Section 4.9)
- Authorize posting Project 2022-02 Uniform Modeling Framework for IBR proposed Reliability Standards MOD-032-2, IRO-010-5, TOP-003-8, and the associated Implementation Plan for an initial 30 calendar day formal comment and ballot period, with ballot pools formed in the first 10 calendar days, and initial ballots conducted during the last 10 calendar days of the comment period.

Background

The Federal Energy Regulatory Commission (FERC) issued Order No. 901 on October 19, 2023, which included directives on new or modified NERC Reliability Standard projects.¹ FERC Order No. 901 addresses a wide spectrum of reliability risks to the grid from the application of Inverter-Based Resources (IBRs), including both utility scale and behind-the-meter or distributed energy resources. Within Order No. 901, there are four milestones that include sets of directives to NERC. NERC Standards Development has identified three active projects (2020-06, 2021-01, and 2022-02) that are directly impacted by the associated FERC directives in Order No. 901.

In addition, to assist readers, please see the following additional documents drafted to help keep the NERC Milestone 3 projects organized.

- [FERC Order No. 901 - Summary Information of Milestone 3](#)
- [FERC Order No. 901 - Summary Graphic of Milestone 3](#)
- [Standards Development Mapping of FERC Order 901 Directives and Other Guidance to Standards Development Projects](#)

This one pager addresses Milestone 3 Project 2022-02 and the FERC directive covering the development of Reliability Standards to address concerns “related to IBRs at all stages of interconnection, planning, and operations.”² Among other things, FERC directed NERC to develop

¹Reliability Standards to Address Inverter-Based Resources, Order No. 901, 185 FERC ¶ 61,042 (2023), available at [eLibrary | File List](#).

² FERC Order No. 901 at P 25.

requirements addressing the provision of IBR and Distributed Energy Resource (DER) data to the entities responsible for the planning and operation of the Bulk-Power System.

All new or modified Reliability Standards and associated Implementation Plans addressing Milestone 3 of Order No. 901 must be filed with FERC by November 4, 2025. NERC Project 2022-02 addresses 24 FERC directives through modifications to MOD-032-2, IRO-010-5, and TOP-003-8 in addition to the development of the Implementation Plan.

At its November 13, 2024, meeting, the Standards Committee (SC) accepted the FERC Order No. 901 – Milestone 3, Part 1: Modeling and Data Sharing Requirements Standards Authorization Request and appointed this SAR to the 2022-02 Uniform Modeling Framework for IBR DT, as recommended by NERC staff.

NERC staff hosted a joint workshop from January 15-17, 2025, in Phoenix, AZ. During the workshop NERC staff and drafting team (DT) members reviewed the FERC directives associated with Milestone 3 and talked through concerns of industry prior to the development or modification of each standard(s) with its associated project.

A quality review for MOD-032-2, IRO-010-5, and TOP-003-8 and the associated Implementation Plan was conducted from March 14 to March 24, 2025, by NERC legal and engineering (Alain Rigaud, Lauren Perotti, Sarah Crawford, and JP Skeath), members of the DT (Hari Singh, CORE Electric Cooperative), PMOS Representatives (Donovan Crane, WECC), and industry members (Sarah Habriga, AEP; Todd Bennett, AECl; Ruth Kloecker, ITC Holdings; and Sean Bodkin, Dominion Energy).

NERC Standard Processes Manual Section 16.0 Waiver provides as follows:

- The SC may waive any of the provisions contained in this manual for good cause shown, but limited to the following circumstances:
 - In response to a national emergency declared by the United States or Canadian governments that involves the reliability of the BES or cyber-attack on the BES;
 - Where necessary to meet regulatory deadlines;
 - Where necessary to meet deadlines imposed by the NERC Board of Trustees; or
 - Where the SC determines that a modification to a proposed Reliability Standard or its requirement(s), a modification to a defined term, a modification to an interpretation, or a modification to a variance has already been vetted by the industry through the standards development process or is so insubstantial that developing the modification through the processes contained in this manual will add significant time delay.

Summary

Project 2022-02 DT leadership and NERC staff request that the SC approve a waiver under section 16.0 of the SPM regarding the length of comment periods and ballots in order to meet the November 2025 regulatory deadline for Project 2022-02 as established by FERC.

Project 2022-02 DT leadership and NERC staff recommend that the SC shorten the initial formal comment and ballot period for all standards and definitions developed under Project 2022-02 from 45 calendar days to as few as 30 calendar days and any additional formal comment and

ballot period(s) from 45 calendar days to as few as 15 calendar days. In addition, Project 2022-02 DT leadership and NERC staff recommend shortening the final ballot of all standards and definitions from 10 calendar days to as few as five (5) calendar days.

NERC staff recommends the SC authorize initial formal comment and ballot period for Project 2022-02 Uniform Modeling Framework for IBR for a 30-calendar day formal initial ballot, with ballot pools formed in the first 10 calendar days, and initial ballots conducted during the last 10 calendar days of the comment period.